

Ser	Page	Section	Policy	Comment	Plann ing?	Outsi de scope of NP	Co ns ult ati on iss	Gene ral/I you t/ref eren ces/t	Possible response
1.			General Comment	How can you possibly allow such a plan to be agreed when we all struggle to get planning with some small adjustment to our homes. The infrastructure cannot possibly take 50 new homes. This will impact the integrity of the local area and destroy an area of outstanding natural beauty. I strongly object on every possible front	Y				As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The development already approved will have been assessed for its impact on infrastructure by Waverley Borough Council though the consideration of the relevant planning applications.
2.			General Comment	As previously stated in our informal comments, all references to the NPPF need to be updated to the most recent edition of the NPPF (2019). All references need be checked against the updated version, as currently references appear to in relation to the NPPF (2012). Examples of where this is necessary include: footnotes 22 and 23 on page 30.			Y		Agreed
2.			General Comment	Contents: We would avoid titling section as 'XXX Policies', this may cause unnecessary confusion as the whole section could be viewed as a 'Policy'. For example, change Sections 9 to 'Utilities'.			Y		Agreed
3.			General Comment	It is a concern that a lot of the information gathered for the plan is over 5 years old. Various planning applications have been put in since then, with Cherry Tree Lane already built and work about to start on the Firethorn development.	Y				Noted
3.			General Comment	Also since the allocation of 115 new houses, we have the appeal accepted for the building in the Bulls Head garden. As a Ewhurst resident, I feel that objecting to planning applications is a waste of time. Is there a process available to keep the plan up to date?	Y				The plan can be reviewed if matters significantly change. In reality plans are reviewed about every 5 years.
4.			General Comment	A Neighbourhood Plan should not only concentrate on housing development but should provide a direction to cover all aspects of the village.	Y				Noted

5.	General Comment	I am concerned the village already has planning permission for 115 houses, which will obviously have an effect on the villages rural environment and infrastructure. I have huge concerns regarding traffic and have knowledge of two accidents in recent weeks on the corner of the street and the green. This is close to the proposed entrance for the Firethorn development and I am concerned that this new development will cause issues on our village roads during the development and afterwards due to higher level of residence. I want to add that in addition to protecting the three stated quiet lanes - Gadbridge Lane should also be included and protected.	Y	See Column M
5.	General Comment	Large goods vehicles have been regularly witnessed on this small lane; in addition to drivers travelling at high speeds.	Y	The issue of HGVs travelling through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available.
5.	General Comment	I hope that any plan will take into account the views of the community and understand that those who choose to live in a village do so to benefit from the rural environment. Therefore protection of the village's natural environment is of overriding importance. The village must not be pushed into being over developed just to fit in with government quotas; influenced by those who do not live in our village, have no interest in our village other than to meet their targets and allow others to profit; while damaging the quality of life of those who reside here.	Y	Noted

6.

General Comment

The Plan has been prepared against the background of its future test against “basic conditions” as defined in Paragraph 8(2) Schedule 4b of the Town and Country Planning Act 1990 (as amended). As a reminder, the “basic conditions” are in summary that the NP must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area, and
- Not breach, and must otherwise be compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.

We have concerns that the NP in its current format may be considered to:

- fail to have regard to national policies and advice in the areas identified;
- not contribute to achievements of sustainable development;
- not be in general conformity with the Development Plan or fails to sufficiently justify itself where it chooses to depart from the policies;
- not be compatible with European Habitats and Species Regulations.

The recommendations have therefore been made to help the NP address areas where it could potentially fail the “basic conditions” requirement within the Town and Country Planning Act 1990 (As amended) when it gets to that stage.

Y Noted

7.	General Comment	<p>We have lived in the village for nearly 35 years and feel rightly proud of this supportive community. We are, however, really anxious about all the developments now underway and fear for the nature of the village in the face of the coming extra 120 houses. I am sure that the strain on roads, junctions, parking, school etc. will be immense -but the die is cast on this already.</p> <p>My concern is that I find in section 12.1 of the document immediately after the acknowledgement of our over-fulfilment of allocated quota (now, with the Bull's Head development) which is 20% over, the most extraordinary proposition to 'throw' two extra sites as being acceptable for development in the future. Why? It is tantamount to inviting more developers in, implying that we, the village, would accept these sites going under. We do not, and to refer to 'future pressure ' is ridiculous. Apart from the general knowledge that houses are not selling at the moment, there must be the assumption that after this intense period of activity, there must be a cessation, in which to draw breath and adapt to the changes that 120 extra dwellings will make. Decisions then will obviously be more relevant.</p> <p>Please do not sacrifice some of the most special fields and spaces that surround our village (with the most ridiculously challenging access areas) to some weird kind of future possibility. That is tantamount to admitting that the allocation system is a failure, and that we are in thrall to people who just want to make money.</p> <p>As a community we need to stand united against further development and face the threat of more demands when and if they come. Then there needs to be total honesty and debate about any further sites to be developed, and a genuine debate about where this would need to be, to minimise the distress and loss of privacy to villagers and our way</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The development already approved will have been assessed for its impact on infrastructure by Waverley Borough Council though the consideration of the relevant planning applications. To avoid confusion, section 12.1 of the plan has been removed. The plan can be reviewed if matters significantly change.</p>
8.	General Comment	<p>The language is somewhat confusing in places and does not clearly indicate whether the wording is for or against particular points. Also the grammar needs checking.</p>	Y	<p>In revising the NP, the language as has been reviewed and areas that were not clear have been corrected. The layout has been improved and links to supplementary information improved.</p>
9.	General Comment	<p>Although the plan states within the text that; no further village site allocations are necessary at this time', the accompanying documents do suggest further potential sites, which seems to invite development on some sites.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP.</p>

10.	General Comment	The demand of 100 homes for Ewhurst is not without significant impact, made worse by the horrendous expansion of Cranleigh through the widespread building works within that area. Ewhurst has already met the 100 home requirement through sites that have been given planning permission and it would seem therefore that residents should be able to live with some certainty until 2032. The composition of the plan takes away some of that certainty and I wonder if this is avoidable.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP.
11.	General Comment	I do think that the draft is ambivalent, even confused, by the status of Ewhurst Green within the parish. It is a distinct sub community of the village. The draft seems to feel the need to put in brackets page 14/15 (including Ewhurst Green) is if it is a community in quarantine. EG is outside the settlement boundary with its own Conservation Area (slightly overlapping). It has suffered continuous encroachment and "coalescence" culminating in the outrageous decision to allow planning permission on a major space for 18 houses. Indeed page 32 refers to Ewhurst Green 'at risk of becoming completely amalgamated with Ewhurst". I do not feel that the NP have recognised this in their analysis and have not taken due regard of the distinctive character of the Ewhurst Green settlement and community.	Y	Specific references to Ewhurst Green and other small communities and hamlets have been added to the plan.
12.	General Comment	The hamlet of Cox Green will be irreversibly changed should these housing developments be allowed to progress. There are already housing developments taking place in neighbouring Rudgwick and the village and infrastructure is not designed for a large influx of people.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP, this includes within Cox Green. However, any planning permissions already granted will continue to be built out.
13.	General Comment	In my opinion the proposed NP has significant shortfalls and is not fit for purpose. False reasoning is provided to justify development of unsuitable sites. It ignores the fact that Ewhurst has already provided over 20% more new housing that it was allocated, and future development should be limited to 4/5 new houses in any one year and in one/two houses per plot.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, the development already approved will continue to be built out.

14.	General Comment	<p>In my opinion incorrect reasoning has been given to justify development of sites that are totally unsuitable for such a purpose. The NP is inviting large developments at the expense of small, one / two new houses over time. It is ignoring the fact that Ewhurst has already provided over 20% more new housing that it was allocated. We should only sanction infill and not invite more large-scale development.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, the development already approved will continue to be built out.</p>
15.	General Comment	<p>We feel that there should not be any more houses built as the roads can't cope with any more traffic. There are not enough Drs or Schools for all the new people. This is a village that is going to become a town. Plus, closing the Cranleigh tip is madness and encouraging fly tipping.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The development already approved will have been assessed for its impact on infrastructure by Waverley Borough Council though the consideration of the relevant planning applications. Unfortunately, the closure of the Tip in Cranleigh it outside of the control of the Neighbourhood Plan or the Parish Council. The feelings are noted</p>
16.	General Comment	<p>I cannot have any faith in the power of the Neighbourhood Plan when Waverly or the inspectors can over-rule the villagers' opinion. The village boundary will simply be extended in a few years to abut any new development e.g. Larkfield. 'Affordable' needs to be truly affordable for those on average and below incomes.</p>	Y	

17.	General Comment	Would strongly suggest no more properties permitted until infrastructure is capable of supporting existing village - frequent power failures, water leaks, speeding traffic, no new access adjacent to The Green and The Street - such a dangerous junction.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The development already approved will have been assessed for its impact on infrastructure by Waverley Borough Council though the consideration of the relevant planning applications. These permissions will continue to be built-out.
18.	General Comment	Planning is the bane of our lives, and for Ewhurst we will lose the integrity of our village. Further estates at the back of the houses on The Street with poor access to all. Extra housing in four areas in Mapledrakes, sadness! 2032 eh! Living in Wykehurst Lane has been a rural pleasure. Adjacent to a footpath often used by the children of Sayers Croft. Now it seems that two chunks of land are being put forward along the footpath off a narrow, narrow lane.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP.
18.	General Comment	We will be in the hands of the planners - rules continue to change to the detriment of those in situ. Perhaps the parish can put as much fight into future applications as they have in the past.	Y	The comment is noted

19.	General Comment	<p>I wish to object most strongly to the Planning Applications for two major development schemes recently refused by Waverley Borough Council and now subject to Planning Appeals. The developments in question are the land South of Baynards Lane owned by Mr Beckwith-Smith and the land at Windacres Farm North.</p> <p>These are areas of great landscape value and if planning was approved this would increase the number of houses in Cox Green, a rural hamlet, from 48 to 158 completely destroying this local rural area.</p> <p>Both sites would be accessed close to a particularly dangerous bend on the B2128.</p> <p>There is no significant local employment and the main A281 to either Horsham or Guildford is already heavily congested with traffic as are the local roads.</p> <p>With all the hundreds of houses being built in nearby Cranleigh the requirement for new dwellings set by Waverley has been surpassed, There has already been a significant amount of houses being built in Rudgwick (which I am aware is in another Council area but these are virtually adjacent to the proposed development schemes). So there does not appear to be pressing requirement for more houses, also bearing in mind the large volume of houses being built within a 10 mile radius of Rudgwick at Broadbridge Heath, Billingshurst, Loxwood, Alfold and Wisborough Green. And, of course, the threat of 1,800 new homes on Dunsfold Aerodrome.</p> <p>If people in the local area are so desperate for local housing why are the properties not being snapped up and it is necessary for the new houses in Rudgwick to be advertised for sale in a South London "free" magazine, extolling the benefits of "views of the picturesque countryside". They are hardly "affordable" at starting prices of</p>	Y	<p>Unfortunately, comments relating to current planning applications and appeals must be made to the relevant Authority, which in this case would be the Planning Inspectorate. However, the appeal against the refusal of an application for up to 57 homes on land south of Windacres Farm (ref WA/2018/1458) was dismissed on the 15/11/2019. In his decision, the Inspector commented that the effect of the proposals on the character and appearance of the area would be considerable due to the change in landscape and visual character and the incongruous form of the development in this part of Rudgwick and Cox green.</p>
20.	General Comment	<p>The draft Neighbourhood Plan appears to concentrate on the issues relating to settlements of Ewhurst and Ewhurst Green whilst those relating to southern part of the parish, specifically Ellen's Green and Cox Green are hardly considered. In fact, Cox Green hardly gets a mention, even though it continues to be the subject of two major planning applications. In addition, we found the report to be ambiguous, in that it is unclear in certain sections as to whether the whole parish or just the village are referred to. We suggest that the report is looked at critically to remove all ambiguity.</p>	Y	<p>Greater reference to these communities has now been included within the plan. The plan applies to the whole Parish.</p>
20.	General Comment	<p>Consistency is required e.g. is it Ellen's or Ellens Green?</p>	Y	Amended

21.	General Comment	I have spent many hours reviewing and preparing comments on these documents, however as is very clearly demonstrated above there are several examples of where the NP does not tie in with its supporting documents, and inaccuracies and conflicts abound as it is currently written, and outstanding question marks from the HLAA and SAA about deliverability of sites go without being addressed in the NP. I am therefore unable to accept the Plan as it stands without these being addressed. I do hope however that my comments are useful in helping the next version of the NP move forward.	Y	This is noted. It is hoped that the changes made to the plan in response to the comments have addressed many of the concerns raised.
22.	General Comment	Ewhurst has already approved more than 130 new homes, in a semi-rural area with limited infrastructure. We have therefore more than fulfilled our obligations for sustainable development in the time period specified by the plan.	Y	Noted
23.	General Comment	Ewhurst has already approved more than 130 new homes, in a semi-rural area with limited infrastructure. We have therefore more than fulfilled our obligations for sustainable development in the time period specified by the plan.	Y	Noted
24.	General Comment	This plan has incorrect assumptions and arguments for the locations are not consistent. I cannot see how roads supporting the proposed locations can be built. Indeed assumptions include using roads which are privately owned for potential access. No one can or should support a plan which is not fully formed or contain the phrase access to be resolved. That isn't a plan, it's a disaster. Why are locations ruled out because of a reason when the same reason is true for those locations being proposed.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The plan has been amended to reflect this position and it is hoped that this will address these concerns.
25.	General Comment	EU: One has to assume that Brexit with or without a deal will happen and that the wording in the final document needs to cater for any scenario that the UK will not need to adhere to EU regulations and thereby to avoid subsequent changes to the wording in the final Plan (i.e. pages 6, 12 & 34).	Y	The EU environmental legislation relating to planning has been enshrined into UK law and therefore this currently has no impact.
25.	General Comment	National Plan: Whilst there might be a National Plan to be used as a guideline one must assume that this cannot be obligatory for every precise location throughout the country and that there will be the possibility of variations that each individual locality will be able to apply?	Y	The overarching National Plan is called the National Planning Policy Framework (NPPF). It is also accompanied by guidance. The NPPF sets out a set of broad policies, principles and aims. It requires Local Authorities and Neighbourhood Plans to set out in plans how these will be delivered locally and it also allows them to adopt more locally specific policies so long as they do not conflict within the framework established at the national level.

25.	General Comment	Demographics: How will recent changes to the national demography of the UK alter the longer term future perspective?	The meaning of this comment is not fully understood. The Waverley Local Plan does consider the implications of an ageing population on, for example, matters such as housing.
26.	General Comment	<p>I am interested, indeed very concerned at the requests for further development, particularly at Cox Green (by Mr Beckwith Smith and Mr J Bailey) Y</p> <p>There seems to be on ongoing battle here.</p> <p>The proposed development would in no way be an asset to our rural environment.</p> <p>There is insufficient infrastructure to accommodate more housing with few buses, 1 shop, 1 primary school, the surgery is full....Are the proposers really intent to give needy affordable housing here? 1.5 miles to the nearest shop, school, surgery ... buses running 1 an hour and none on Sundays.</p> <p>The existing roads are a hazard ... a number of accidents have taken place, so these can't cope with new entrances / exits. Please do all you can to protect our environment: So much of our village has been taken up with new development. Hermongers Lane recently had planning permission at the W Sussex end of the lane, involving a lot more traffic making a further hazard on our narrow lane.</p> <p>Our lanes are valued by families, people walking their dogs ... people like myself who enjoy the countryside. I often take my life in my hands with huge lorries coming up the lane to the West Sussex end.</p>	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The appeal against the refusal of an application for up to 57 homes on land south of Windacres Farm (ref WA/2018/1458) was dismissed on the 15/11/2019. In his decision, the Inspector commented that the effect of the proposals on the character and appearance of the area would be considerable due to the change in landscape and visual character and the incongruous form of the development in this part of Rudgwick and Cox green.</p>

27.

General Comment

My first concern is that I feel that the draft plan is too dense a document, and not easy for the community to read, and therefore people miss reading the essential points of the plan. It is not a user-friendly document, I am used to researching articles (albeit not on planning and development), but struggled to wade through each page to find the essential points that the plan aspire to. Where are the bullet points and summaries? On the same subject I find important articles about future planning hidden in the seemingly abyss of the draft, so hard to find, that you wonder if you are actually supposed to be able to easily identify such issues? An example of this is on potential future development sites, which I would suggest that the majority of the community are unaware of. So for those that are interested and unaware and have asked for my help, I have told them how to find the information, which is: you will find this information on the Neighbourhood plan on line. Click on to The Plan then click on ...click here to download pdf file, then go down many pages to the title section 12 Housing site policies. Read this then at the end of 12.2 section click on to 39 Ewhurst and Ellens Green Housing Land Availability Assessment, Shrimplin Brown, August 2018.
https://www.ewhurstellensgreen-pc.gov.uk/uploads/1/1/5/2/115240781/ewhurst_ellens_green_housing_land_availability_assessment.pdf Scroll down to page 34 and you will find all the assessments and their future considerations there. Surely you could have simplified finding such an important issue!

Y

In revising the NP, the language as has been reviewed and areas that were not clear have been corrected. The layout has been improved and links to supplementary information improved.

28.	General Comment	<p>COMMENT: The draft Plan, some of the Background Information and the Consultation Exercise during July and August 2019</p> <p>This response should be understood, properly recorded and correctly reported. All the responses to consultation on the draft Neighbourhood Plan I have submitted are about the draft plan itself, what is in it and not in it and, to a lesser extent, the consultation exercise on that plan undertaken during July and August 2019 for that plan.</p> <p>None of my responses are an objection to the plan and its policies or conversely unconditional support for the plan and its policies. Nor should any of my responses be interpreted as support for or an objection to the potential development sites ever considered by the plan, for there are now no sites mentioned identified in the plan and its policies.</p> <p>All my submitted responses, including this one, are an opinion or observation about the draft plan and, to a lesser extent, some of the work which has contributed to what it now contains. This is after all what consultation at this stage in the process is about. It is an opportunity for anyone in the community to contribute to what the plan says and does. It is not an opportunity to simply register support for or object to a plan or vote for or against it. In the main, all my responses including this one are about whether the draft plan and its policies, some of the reports providing background information and, to a lesser extent, the consultation exercise, are or were fit for purpose. The responses which have been submitted conclude that the draft plan and its policies, some of the background information and the consultation exercise are or were NOT FIT FOR PURPOSE.</p>	Y	The consultation period took place over 8 weeks to allow time for holidays. The other comments are noted.
29.	General Comment	<p>The draft Ewhurst and Ellen's Green Neighbourhood Plan 2019 – 2032 as published for community consultation during July and August 2019 currently falls a long way short of what is required of a neighbourhood plan to be included in the statutory development plan for the area.</p>	Y	Noted
29.	General Comment	<p>It has been assembled by those who clearly have only limited understanding of what a statutory development plan document – in this case a neighbourhood plan, can and cannot say and must and must not include.</p>	Y	Noted

29.

General Comment

General and Overarching Comment

The draft Ewhurst and Ellen's Green Neighbourhood Plan 2019 – 2032 as published for community consultation during July and August 2019 currently falls a long way short of what is required of a neighbourhood plan to be included in the statutory development plan for the area. It has been assembled by those who clearly have only limited understanding of what a statutory development plan document – in this case a neighbourhood plan, can and cannot say and must and must not include.

Some sections and some policies have been "lifted" from a few other neighbourhood plans. However this has been done without realising that each neighbourhood plan should be "customised" to be appropriate to the local situation and the evidence gathered. One cannot do "a cut and paste" exercise without knowing what you are doing – without understanding what a neighbourhood plan and a statutory development plan is and can and cannot do.

Apart from there being multiple errors and omissions in the draft plan, it is calculated to mislead the community about what the plan could achieve and do in terms of "controlling" development and change in Ewhurst and Ellen's Green Parish i.e. the plan area.

General to Whole Draft Plan and the Consultation Exercise.

All submitted responses to the draft plan are neither "in support or objection" to the draft plan – they are neither "a vote for or against" the plan – and they must not be recorded or reported as such. The following response and all others I have submitted are points made about the draft plan and the consultation exercise undertaken from mid July to the end of August 2019. That is what community

Y

The response from Waverley Borough Council and the support of a Planning Consultant has helped the group to determine which topics are planning related and which are not. The revised plan has been amended accordingly and improved maps have now been included. The consultation responses and amendments to the plan as a result, will be set out in the Consultation Statement that accompanies the submission Neighbourhood Plan.

30.	4	3, 9, 12	Section 12, Section 2.2 and The Foreword	<p>Taken together these sections and statements mislead the community as to why:</p> <p>- It has taken 5 plus years to produce a draft plan; and- As the draft Neighbourhood Plan no longer needs to identify and allocate more sites for new housing development, the community has now lost the chance to choose where it should go. The reasons do not lie with developers who have only exercised their statutory right to seek planning permission for new housing on land which they have an interest in. They do not have to wait until a neighbourhood plan has been drafted. Nor does the blame lie with planning inspectors who must determine appeals according to considerations extant at the time and not a still to be prepared plan. It has taken so long to prepare a draft plan (and in consequence there is now no need for further allocations) because much of the work Agreed for identifying, assessing and then selecting potential housing development sites was unnecessary, faulty and not correctly Agreed. The Site Identification and Assessment Criteria Survey was an unnecessary delay. Most of the Assessment Criteria which were eventually used were no more than the standard or given criteria used by all neighbourhood plans. There was no need to seek the community's agreement to them. The only point of the SIAC Survey was to try to justify some inappropriate criteria designed to steer the assessment and choice of sites away from certain pre-determined locations. The consultants Shrimplin Brown were ostensibly independent. But their work was:- Not entirely satisfactory for it was full of errors, inconsistencies and omissions;- Not complete and sound in its conclusions because it did not properly investigate and assess some aspects like access to sites which are material to whether they are suitable and achievable; and- Not</p>	Y	<p>The comments are noted. The Steering Group is made up of volunteers who have chosen to take up the responsibility for preparing a Neighbourhood Plan. It has been a massive learning curve and it is hoped that the plan as revised following the recent consultation can progress more quickly to avoid other occasions when information or evidence become out of date.</p>
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31.	GDPR Permissions	<p>We understand that the Parish Council needs our names and addresses to ensure comments taken into account after this Reg 14 consultation are only from those who are entitled to comment - i.e. who live or work in the parish (or have a relevant interest in the NP). So, if we don't give permission as residents, our responses cannot be taken into account in shaping the next version of the NP. But having checked with Planning Aid what's required for Regulation 15, we think the PC has misunderstood the Neighbourhood Planning Regulations. We understand that Reg 15 requires that the status of the people who have been consulted is identified in the published Consultation Statement so their comments can be seen in context - whether from residents, village interest groups, relevant public or voluntary bodies, landowners/ developers etc. But there is no requirement to disclose the personal identity of individual consultees (name and address) alongside their comments, because this is not necessary for the purposes of the Statement. The PC's misunderstanding could put some people off responding and engaging with this important Reg 14 stage of the NP process. Hope this doesn't jeopardise this consultation.</p>	Y	<p>It is common practice to seek names and addresses so that those that commented can be contacted and updated on the progress of the plan. They are used only for this purpose and no other.</p>
32.	GDPR Permissions	<p>Firstly whilst I understand and agree that my personal details may be stored by the Council, I agree to my name being disclosed alongside my comments under protest. I have investigated Regulation 15 of the Neighbourhood Planning [General] Regulations 2012, and believe that the NP team has misinterpreted this provision. The wording is not totally clear, but I cannot believe that the legislators wanted to enforce the publishing of people's identities alongside their comments for obvious reasons - this clearly could inhibit some people from submitting comments. If my view is correct it must mean the current consultation is flawed.</p>	Y	<p>It is common practice to seek names and addresses so that those that commented can be contacted and updated on the progress of the plan. They are used only for this purpose and no other.</p>

33.	Ewhurst and Ellens Green Draft NP Reg 14 consultation response	<p>We support the principle of a Neighbourhood Plan for Ewhurst and Ellens Green, but we cannot support the draft NP in its current form. Our main concerns with the draft NP are:</p> <ul style="list-style-type: none"> • The Housing site policies - as drafted - are neither justified nor necessary and will put the parish at risk from even more development in locations which also cannot be justified. • The site assessments underpinning the housing site policies- and described as an essential part of the plan - are not credible. They are selective, misleading and flawed and should not have been published by the PC before the detail had been checked and corrected. • If these site assessments are to remain in the public domain, a health warning should be attached to avoid challenge by site owners. • Ewhurst's important heritage assets (including conservation areas) have not been given the heavy weight claimed in the NP. 	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The plan has been amended to reflect this position and it is hoped that this will address these concerns.</p>
33.	Ewhurst and Ellens Green Draft NP Reg 14 consultation response	<ul style="list-style-type: none"> • The draft plan, as a whole, lacks clarity and cohesion and sufficient justification. It is peppered with internal conflicts and confusion. It contains many errors and inconsistencies, and needs a good proof-read and copy edit. Also more could be made of the excellent working group evidence documents to add substance to the Plan. 	Y	<p>Noted, the layout of the revised plan has been improved and better links to the evidence base included.</p>

33.	Ewhurst and Ellens Green Draft NP Reg 14 consultation response	<ul style="list-style-type: none"> • The scant level of community consultation and engagement in the NP process from NP team and PC - especially since 2017 - falls far short of government advice and guidance. This conflicts with the whole concept of localism and Neighbourhood Planning where the emphasis is on the community leading and shaping the Plan and its policies. With better and open community engagement and involvement along the way - with appropriate professional mediation - this Plan would have been stronger and less flawed. • The long silence on substantive matters since 2017 has undermined the ability of the community to make a meaningful contribution through this Reg 14 consultation, since the content of the draft plan - and associated documents - has come as a complete surprise. How can the community be expected to wade through this mountain of paper from cold and make informed comments? • We also have concerns about the way this Reg 14 consultation was agreed and launched by the PC, and how the consultation itself has been conducted. Having said that, these are matters for the next stage when the NP moves into Waverley's control. • The lack of transparency in the preparation of this NP over the last three years is seriously worrying. 	Y	The consultation that has been undertaken and how it has influenced the plan will be set out in the Consultation Statement which accompanies the Submission version of the plan. This will be tested through the examination of the plan.
34.	Ewhurst and Ellens Green Draft NP Reg 14 consultation response	I have found it disappointing that although the public consultation commenced on Monday 8th July the first open meeting was not held until Monday 19th August - so, only 13 days before the closing date of 1st September and therefore much too late. Also, I never received a leaflet at my home, and nor did at least one other household to my knowledge. I had thought that every house in the NP area was to have a leaflet delivered.	Y	Open meetings are just one part of the overall consultation and are not a requirement. The intention was to provide people with the opportunity to get a greater understanding of the plan and ask questions. People need time to read the plan before such events to make the most of such occasions.
35.	Ewhurst and Ellens Green Draft NP Reg 14 consultation response	While we appreciate that the Neighbourhood Plan Steering Committee and the Parish Council have spent weeks, months and even years putting together this Neighbourhood Plan, the fact is that this NP is meant to be an expression of the collective opinions of the residents of the village.	Y	Noted

35.		Ewhurst and Ellens Green Draft NP Reg 14 consultation response	We feel strongly that the residents have not had the opportunity to consider or even discuss the various choices with the only public meetings being about site criteria, not about the sites themselves, and those meetings were back in 2017. Since then very out of date NP minutes on the website and no new documents has made it very difficult to follow what has been decided by either the steering Committee or the Parish Council. As I write there has been no opportunity for a frank and open discussion of the choices being made in the NP (not by the residents, but by the Parish Council) which are now presented in a dense 51 page Neighbourhood Plan document plus a 75 page Shrimplin Brown Assessment report and an 86 page SEA. Only now through these lengthy documents have the residents been made aware of the detailed site assessments.	Y	The Submission version of the Neighbourhood Plan is accompanied by a Consultation Statement stating what was done and when. This will be considered by the Examiner as part of the examination of the plan.
35.		Ewhurst and Ellens Green Draft NP Reg 14 consultation response	These documents have been put out for consultation in July and August which is the summer holiday period and supported by a brief leaflet designed to encourage people to check a few boxes to express their approval but not designed to encourage full comment or express disapproval. There have been no public opportunities before the consultation for questions to be answered, or during the first six weeks plus and now two meetings were announced in the Ewhurst PC Bulletin 294 dated August 7th that two public meetings will be held on August 19th & 27th in the last two weeks, indeed the final 4 days of the consultation and while people may still be on holiday .	Y	The consultation has taken place over a period of 8 weeks to allow for holidays.
36.	0	Front Cover	Approved in principle, but work/refinement needed.	Y	The comments are noted.

37.	3	Forward	<p>Forward by Chair.</p> <p>Some of the material and statements produced for or about the neighbourhood plan could mislead community. For instance in early 2019 the Chair of the Parish Council published in the Parish Newsletter (which goes all properties) an incorrect statement about the plan process. When challenged it was withdrawn and corrected in an on-line statement seen by a minor proportion of residents. Some of the information and statements in the draft Plan and issued for community consultation are also misleading and/or capable of being misunderstood by the community. Providing misleading information even extends to the Foreword in the draft neighbourhood plan by the Chair of the Parish Council (although it is suspected that at least one or two elements in it were written or supplied by another party.)</p> <p>- Paragraph 3 of The Foreword. It is true that the concept of communities determining their future via neighbourhood plans has come under severe pressure, but it is wrong to blame the 5 plus years it has taken to produce a draft plan on pressures from developer challenges and legislative changes. Challenges from developers have been around from the outset and all they have done is ensure that neighbourhood plan teams keep to the "rules" set out in legislation, regulation and guidance. Likewise there have been no significant legislative changes in the period which can account for taking 5 plus years to produce a draft plan.</p> <p>- The 2017 Community Consultation was NOT proper community consultation. The draft plan refers to it as a survey. It was not consultation or survey. It was a vote on often unnecessary criteria and objectives. Moreover the survey results did not provide a backbone for</p>	Y	In revising the NP, the language has been reviewed and areas that were not clear have been corrected. The layout has been improved and links to supplementary information improved. The Foreword has been updated to reflect the current position.
38.	3	Forward	Check for consistency of p vs P for the word Parish.	Y	Done
39.	3	Forward	"The number of appeal decisions upheld within the parish, which has allowed greater development,..." I know what this means, but it should be written more clearly. e.g. "The number of planning applications approved within the parish, which has led to a great deal of development in the last couple of years, has undoubtedly..."	Y	Done
40.	4	Executive Summary	The Executive Summary should emphasise that Ewhurst has fully met the target of 100 allocated by Waverley Borough Council in its Local Plan. Therefore, there is no current necessity to provide for further development.	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section

41.	4	Executive Summary	If there are no specific sites allocated, how is the NPlan going to prevent inspectors simply allowing new development wherever it is applied for?	Y	Planning applications have to be assessed against the policies in the Development Plan, this includes the Local Plan and Neighbourhood Plan. If there are no allocations of land for housing (as it is deemed that the current target has already been met), then the applicant needs to demonstrate why their application (which would be contrary to the plan) should be permitted. This would be tested by an Inspector as part of an appeal process and is considered on a case by case example. The recent appeal at Windacres considered these issues alongside matters such as the harm to landscape character and the appeal was dismissed.
42.	4	Executive Summary	<p>p4 "we want to remain much as we are" - The NPPF states plans should not be negative toward new development. This line may be flagged at a later stage.</p> <p>p4 "Nevertheless, as the plan is due to run until 2032 any future applications for development will be made in accordance with Waverley Borough Council guidelines and the recommendations of the Housing Land Availability Assessment and Sustainability Appraisal (Strategic Environment Assessment) reports"</p> <p>As a planning document, this reference to unspecified "guidelines" is weak - does it mean the WBC Local Plan?</p> <p>Also, by citing the recommendations of the HLAA and SEA here, we are implicitly allocating them in "allowing for organic growth" up to 2032. If the wish of the Parish council is not to allocate sites at this time, the NP should be more specific and consistent about the conditions under which it would support future applications.</p>	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section
43.	4,5	Executive Summary	<p>Comment. Suggest re-naming this section Preamble. It is not an executive summary - more a vague preamble with no overview of actual NP policies or the shape of the plan. The reader is none the wiser from reading this as to what the content of the NP actually is. Suggest the plan would be more digestible with an informative executive summary.</p>	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section

44.	4	Executive Summary	<ul style="list-style-type: none"> • “community assets and local businesses” (in Bullet point 3 of Executive Summary heading) – not in section 4. • The “housing development” bullet point is key and should be moved to just after the first paragraph (ending “local area”) rather than hidden at the bottom of the page. <ul style="list-style-type: none"> o A) People are questioning why bother as houses are already being built o B) All your policies relate to new development/ business locations etc., not just housing. • The same “housing development” section should make reference to affordable housing/house size etc. to reflect local concerns and housing need priorities. 	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section	
45.	4	Executive Summary	<p>Suggested Amendment. Housing. Suggested amendment to second sentence to: “As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, no specific sites for housing have been allocated within the EEG NP”. We have updated the 115 figure to account for more recent commitments in EEG. As of 1 April 2019, we have recorded 124 commitments in EEG. Suggested amendment to final sentence: “EEG Housing LAA Availability Assessment”; to avoid confusion with the WBC documents with the same title.</p> <p>Comment. We agree that future planning applications should be determined in accordance with the Waverley Local Plan. Given that this summary wishes to state the obvious, it should also add ‘and relevant NP policies’.</p>	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section	
46.	4	Housing development bullet point	<p>Comment. We agree that future planning applications should be determined in accordance with the Waverley Local Plan. Given that this summary wishes to state the obvious, it should also add ‘and relevant NP policies’.</p>	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section	
46.	4	Housing development bullet point	<p>Comment. We strongly disagree that future applications should be made in accordance with recommendations of the HLAA and SEA. These assessments and their recommendations are not sufficiently credible and conclusive to determine future planning applications (see our detailed comments on Section 12).</p>	Y	This section has been deleted and the relevant information is now included in the Introduction and Background section	
47.	5	Next Steps first sentence	<p>Comment correction needed. 4 steps after Reg 14 are listed, but it is described as three further steps in the first line.</p>	Y	Agreed	
48.	5	Next Steps first sentence	<p>The content on this page isn't relevant to a draft NP and should be removed before proceeding. It would be more appropriate as a cover sheet or note, not in the main body of the text.</p>	Y	This is one possible solution, but it is also common practice to include this information in a Reg 16 plan and the Examiner will later remove it.	
49.	7	1	1.5 Plan Period, Monitoring and Review	<p>Comment. This requires, for the sake of completeness, a reference in 2nd para to the periodical reviews of the Local Plan that will occur, and the need to ensure the NP’s continued conformity with LP policies.</p>	Y	Agreed

50.	7	1	Introduction and Background	Factual Correction. The EEG NP will not run concurrently with the Waverley Local Plan, it can have the same end date (2032) but it is unlikely to have the same base/start date. Factual Correction. Amend to: qualifying body Neighbourhood Plan authority .	Y	Noted and text amended
51.	8	2	2.1 Plan Development Process	Figure 1 is right: the working groups worked away, but their work did not contribute to the whole.	Y	Noted
52.	8	2	2.1 Plan Development Process	Figure 1: Again, this figure should be removed from the draft NP as it is specific to the stage we are at now (Reg 14). Again it would be more appropriate to move this to a cover sheet or note.	Y	The detailed information on the preparation of the plan is now contained within the Consultation Statement. Amendments have been made in response to the representations. Links to the Consultation Statement are provided in the Neighbourhood Plan and this detail has therefore been removed.
53.	8	2	2.1 Plan Development Process	Comment. Diagram is inaccurate, unclear and has dates missing. Suggest it is corrected/ amended tasking the following into account: · Stage 1 Steering group was established before the public meetings, (impression given here that SG established after meetings). · Stage 2 Phase 1 box (and sub boxes below) - give impression of a hierarchy, when in fact, the working groups and Central co-ordinating group were at same level reporting to the Steering Group. · Stage 2 Phase 2 box. Inaccurate. Gives impression all this happened in May 2015. For accuracy and completeness, and understanding of the process timeline, amend the date to read 'May 2015 - summer 2016'. Also add Parish survey undertaken summer 2015 (v important base survey). · Stage 2 Phase 3 box. Which consultation is this? As the comms person on the Steering Group at that time, I have no knowledge of any consultations that took place before Jan 2017. Suggest delete this box. (There was no consultation about site assessment criteria prior to January 2017.) · Next box: Need to insert stage/ phase number and date. What is meant by 'production'? Also add ref to Jan 2017 consultation on the criteria. (Note these criteria documents were not published prior to Jan 2017 consultation and were first issued as part of the consultation.) · Stage 3 - Need to show date and make clear what was being Agreed by external consultants. How can criteria be reviewed when already published? Do you mean reviewing criteria in light of consultation responses? · Stage 4 Need to show dates of draft plan submissions to PC and Waverley.	Y	The detailed information on the preparation of the plan is now contained within the Consultation Statement. Amendments have been made in response to the representations. Links to the Consultation Statement are provided in the Neighbourhood Plan and this detail has therefore been removed.

54.	8	2.1	Neighbourhood Plan Preparation Process	Amend second paragraph: "... this plan conforms with the strategic policies contained in the Waverley Development Plan (Local Plan Local Plan Part 1..."	Y	Noted and text amended
55.	8	2.1	Flowchart	The flowchart currently misses some of the stages in the Neighbourhood Plan process, e.g. Regulation 15 and 16. We suggest you amend to accurately reflect the process. Amend Figure 1 Caption: Neighbourhood Plan Development Process	Y	The detailed information on the preparation of the plan is now contained within the Consultation Statement. Amendments have been made in response to the representations. Links to it are provided in the Neighbourhood Plan.
56.	9	2	Community Engagement	The last sentence of the "internet" paragraph does not make sense.	Y	Noted and text amended
57.	9	2	Community Engagement	My other concern is that I feel there has been a lack of community input. There seems to be a delay in informing the community on updates through published Minutes. I am led to believe there has been no community engagement since 2017. I feel that the public is very interested and concerned about the plans for their community, but there are those that struggle to communicate their concerns in a formal structured environment, and others find the world wide web just as alien an environment to use. Bringing the community into the drafting of the neighbourhood plan, I feel, needs to be more apparent, and more thought given to informing the majority on what is taking place, rather than giving what seems to be a token gesture at following the government guide lines on making this a community project.	Y	<p>The Neighbourhood planning regulations (Regulation 14) require the draft neighbourhood plan to be the subject of a pre-submission consultation before it is submitted to Waverley Borough Council for independent examination. In accordance with these Regulations this consultation lasted at least 6 weeks (8 July 2019 - 1 September 2019, 8 weeks). Prior to this consultation, it is a matter for the Steering Group and Parish Council to decide what level of consultation and engagement takes place. The EEG NDP has been based on questionnaires, public meetings, surveys and evidence collection. This is set out in the Consultation Statement. The Reg 14 Pre-submission consultation requirements include publicising the draft plan to people who live, work or run businesses in the area as well as a number of statutory bodies. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date. In addition, the plan must be sent to the local planning authority. This was all Agreed in accordance with the requirements.</p> <p>The draft plan was placed on the Parish Council website and printed copies were available from a number of locations or on request from the Parish Clerk. The responses to this important stage in the preparation of the plan have been used to revise and</p>

58.	9	2.2	Community Engagement	<p>Publicity. I disagree with this statement. I have observed that the NP Meetings and Minutes section of E & EG Parish Council website has been very lacking in informative updates. In fact since October 2017 only one set of NP Steering Group minutes relating to March 2019 has been posted there. Why the lack of information over that period? It is not the openness and transparency that the NP community project is supposed to adhere to. Furthermore I have attended several Parish Council meetings over the past months where the NP has been on the agenda, but the adjournment where the public may speak always comes before this agenda item, and then when the item does come up it is discussed in such a way that Councillors have paperwork to refer to but the public are left ignorant of what they are referring to. This is most unsatisfactory as a form of engagement.</p>	Y	<p>The Neighbourhood planning regulations (Regulation 14) require the draft neighbourhood plan to be the subject of a pre-submission consultation before it is submitted to Waverley Borough Council for independent examination. In accordance with these Regulations this consultation lasted at least 6 weeks (8 July 2019 - 1 September 2019, 8 weeks). Prior to this consultation, it is a matter for the Steering Group and Parish Council to decide what level of consultation and engagement takes place. The EEG NDP has been based on questionnaires, public meetings, surveys and evidence collection. This is set out in the Consultation Statement. The Reg 14 Pre-submission consultation requirements include publicising the draft plan to people who live, work or run businesses in the area as well as a number of statutory bodies. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date. In addition, the plan must be sent to the local planning authority. This was all Agreed in accordance with the requirements.</p> <p>The draft plan was placed on the Parish Council website and printed copies were available from a number of locations or on request from the Parish Clerk. The responses to this important stage in the preparation of the plan have been used to revise and</p>
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59.	9	2.2	Community Engagement	<p data-bbox="556 144 924 170">Section 2.2 Community Engagement</p> <p data-bbox="556 175 1270 365">Much of the whole Section is wrong and calculated to mislead both the community, the LPA and the Examining Inspector. It is hoped that when the current Neighbourhood Plan Team come to write the required Consultation Statement they will be honest and correct in what they say in this respect. With respect to Surveys, Consultation and Public Meetings:</p> <ul data-bbox="556 370 1270 690" style="list-style-type: none"> <li data-bbox="556 370 1270 592">- The Pre-Neighbourhood Plan Questionnaire – September 2014 was about something purporting to be a Village Plan (it was actually nothing like a plan.....) for an area much smaller than the neighbourhood plan area. “Consultation” was totally deficient and only a limited number of residents knew about it and were able to respond. Moreover most of those who did respond were from a specific small part of the NP plan area. <li data-bbox="556 597 1270 690">- The Neighbourhood Plan Launch Public Meetings, Early Issues Questionnaire, Parish Survey, Business Questionnaire and Young Persons Questionnaire are all correctly report. <p data-bbox="556 695 1270 755">However NOTE that all occurred before the Summer2016 when the Steering Group and management of the Neighbourhood Plan changed.</p> <ul data-bbox="556 760 1270 1050" style="list-style-type: none"> <li data-bbox="556 760 1270 1050">- The Site Identification Criteria Survey was NOT properly conducted community consultation or real community involvement. It should not be included in this section. It was a “referendum or single vote” on a random selection of criteria and objectives with just one opportunity for a single comment. The Survey form itself had a number of mistakes in it which the team refused to correct before using it. Moreover much of the information needed by the community to make sense of what was being asked, for instance information about where the built-up area boundary lay was not available. 	Y	<p data-bbox="1501 144 2055 852">The Neighbourhood planning regulations (Regulation 14) require the draft neighbourhood plan to be the subject of a pre-submission consultation before it is submitted to Waverley Borough Council for independent examination. In accordance with these Regulations this consultation lasted at least 6 weeks (8 July 2019 - 1 September 2019, 8 weeks). Prior to this consultation, it is a matter for the Steering Group and Parish Council to decide what level of consultation and engagement takes place. The EEG NDP has been based on questionnaires, public meetings, surveys and evidence collection. This is set out in the Consultation Statement. The Reg 14 Pre-submission consultation requirements include publicising the draft plan to people who live, work or run businesses in the area as well as a number of statutory bodies. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date. In addition, the plan must be sent to the local planning authority. This was all Agreed in accordance with the requirements.</p> <p data-bbox="1501 889 2055 1050">The draft plan was placed on the Parish Council website and printed copies were available from a number of locations or on request from the Parish Clerk. The responses to this important stage in the preparation of the plan have been used to revise and</p>
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60.	9	2.2	Community Engagement	<p>Opening para. Comment Agree that an NP is a community project deriving its authority and policies from the community. BUT we totally disagree that ‘communication consultation and feedback have played a major part in the development of our Plan’. This broad brush claim is not supported by the evidence (even that cited in this section of the draft NP). This lack of evidence is demonstrated by the thinness of content in the paras describing the communication/engagement process. Simply present the facts on what actually took place and let those facts speak for themselves, rather than misrepresent them through this broad brush claim. To do so would mislead Waverley and the planning Inspector. Our justification for these comments is as follows:</p> <ul style="list-style-type: none"> • The only community consultation prior to this reg 14 statutory consultation was the January 2017 consultation on site assessment etc. criteria. There has been no substantive communication from the SG/PC on the NP since completion of the evidence gathering phase, other than the Jan 2017 consultation. There has been nothing placed in the public domain about emerging policies, proposals and preferences. And there has been no interactive feedback or engagement - workshops, drop-ins etc. - between the community and the NP steering group or the PC to direct the shape and direction of the NP. It has not even been possible for members of the community to follow what has been going on with the NP through the steering group minutes and updates on the PC/NP website. Steering group minutes have been absent since Oct 2017 (until March 2019, approaching Reg 14). <p>This scant level of consultation and engagement with the community is</p>	Y	<p>The Neighbourhood planning regulations (Regulation 14) require the draft neighbourhood plan to be the subject of a pre-submission consultation before it is submitted to Waverley Borough Council for independent examination. In accordance with these Regulations this consultation lasted at least 6 weeks (8 July 2019 - 1 September 2019, 8 weeks). Prior to this consultation, it is a matter for the Steering Group and Parish Council to decide what level of consultation and engagement takes place. The EEG NDP has been based on questionnaires, public meetings, surveys and evidence collection. This is set out in the Consultation Statement. The Reg 14 Pre-submission consultation requirements include publicising the draft plan to people who live, work or run businesses in the area as well as a number of statutory bodies. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date. In addition, the plan must be sent to the local planning authority. This was all Agreed in accordance with the requirements.</p> <p>The draft plan was placed on the Parish Council website and printed copies were available from a number of locations or on request from the Parish Clerk. The responses to this important stage in the preparation of the plan have been used to revise and</p>
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61.	9	2.2	Publicity	<p>Internet heading. Comment. This is an inaccurate description of NP web presence. It should be redrafted in line with the facts. The NP website is part of the Parish Council website (not 'a separate website') - albeit with its own pages. The only time 'Details of the plan' (whatever that means) were posted was at the start of the Reg 14 consultation. No earlier versions, nor information on the site assessments were posted. Regarding reference to the website being 'regularly updated' this is not factually correct. To state this is misleading and should be deleted. For example, steering group minutes stopped being posted in October 2017, no more evidence documents were posted after the first phase evidence gathering was complete, no terms of reference for consultants, and no reports from consultant. To make matters worse, during the NP process the PC website (incl NP pages) changed and external links to relevant external websites and information on membership of NP working groups, the Steering Group and terms of reference (as well as earlier news updates) disappeared and are no longer available on the new website. The Facebook page does not, as stated, have a 'similar level of supporting material'. The content is sparse, postings are sporadic and followers few. Therefore reference to regular updating should be deleted.</p>	Y	These points are noted and detailed information on the consultation and how it has influenced the plan has been set out in the Consultation Statement.
62.	9	2.2	Surveys Consultations and Public meetings	<p>Second bullet point Comment. Need to amend this bulletin point to fit the fact that NP launch public meetings was one of the first public acts of the newly formed Steering Group, not of the PC.</p>	Y	These points are noted and detailed information on the consultation and how it has influenced the plan has been set out in the Consultation Statement.
63.	9	2.2	Surveys Consultations and Public meetings	<p>"Specific articles relating to the Neighbourhood Plan were inserted in Ewhurst 'News and Views' and 'Ewhurst and Ellens Green News'"</p> <p>Needs to be more specific - what was the distribution of these publications as a percentage of the parish? An external reader wouldn't be expected to know this.</p> <p>"Offering a similar level of supporting material was provided by a separate Facebook page." Grammar - remove the word "Offering"</p> <p>This section would benefit from links or references showing where to download the material referenced here. For example, if we sent out a questionnaire, the NP should link to a copy of it.</p> <p>"Two initial Ewhurst and Ellens Green village public meetings were initiated by the Parish Council" Grammar - reuse of initial and initiated. Remove "initial Ewhurst and Ellens Green village"</p>	Y	These points are noted and detailed information on the consultation and how it has influenced the plan has been set out in the Consultation Statement.

64.	10-13	2.3	Evidence Base Overview	We query the need for the 'Potential Development Sites for Housing', 'Site Identification Assessment Criteria', and 'Choice of Sites'; it is confusing to reader as they may think that the EEG NP is planning to allocate sites for housing. We would suggest it may be better to omit this, as it no longer necessary.		Given that the EEG NDP is no longer looking to allocate land for development, most of this section has been removed as suggested.
64.	10-13	3.3	Evidence Base Overview	The work could be briefly outlined but it should be clear that the EEG NP is not allocating sites – if it was felt necessary further detail could be added in an Appendix. If these sections are retained, despite our recommendation to remove, we would suggest the following are amended: · Many of the site selection criteria are not considered criteria; e.g. a site being in the AONB is not an appropriate criteria.· 'Site Achievability' – this should refer to the ability of the site to be delivered within the Plan period	Y	Agreed
64.	10-13	4.3	Evidence Base Overview	'Site Capacity' - We have significant concerns about the suggested density requirements. There is not sufficient evidence to justifying the density requirements proposed. The density of a development should be considered in relation to local character and pattern of development of the area in which it is situated. We feel the suggested densities are very low.	Y	Agreed, this section has now been removed as the plan is no longer looking to allocate sites for development.
65.	10	2	Surveys Consultations and Public meetings	"Potential Development Sites for Housing" – why not call this "call for sites" as: That is what it is / Less controversial / 'hot' terminology	Y	Noted
66.	10	2	Surveys Consultations and Public meetings	Site Identification Criteria Survey – November 2016" The NP doesn't appear to show how these were incorporated into the final criteria for the HLAA - what instructions were Shrimplin Brown given regarding these? "The housing numbers proposed for Ewhurst" Change "proposed for" to "allocated to". The WBC LPP1 is a legal document, as is the NP. The numbers are not "proposed" - they are decided. That part of the plan will not change unless it needs to be remade.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
67.	10	2.2	Surveys Consultations and Public meetings	First 2 bullet points (continuation of list from page 9).Comment. These two bullet points are confused and inaccurate, and need redrafting and brought together into a single event reference - to get the facts right and avoid misrepresentation. The author seems to be very confused about dates and content of the site assessment consultation part of the process, and also confused between what is a survey and what is a consultation, specifically:	Y	Noted, the list has been simplified with further detail being included within the Consultation Statement instead.

67.	10	2.2	Surveys Consultations and Public meetings	<p>□ φIRST βυλλετ ποιντ – Α σιτε ιδεντιφιχατιον χριτερια συρψεσ διδ NOT τακε πλαχε ιν Νοπεμβερ 2016. Τηερε ωασ νο συρψεσ ον τηε χριτερια ατ ανψ τιμε ιν τηε λεαδ υπ το τηε χονσυλτατιον ον τηοσε χριτερια ιν θανυαρψ 2017.Τηε ρεφερενχε το τηε 437 ρεσπονσεσ ωασ αχτυαλλιψ τηε νυμβερ οφ ρεσπονσεσ το τηε θαν 2017 χονσυλτατιον ον τηε σιτε ετχ. χριτερια. Τηε χλυε ισ ιν τηε ηεαδινγ ον τηε τοπ οφ τηε 4–παγε δοχυμεντ □Χομμυνιτψ Χονσυλτατιον□. Τηε ρεσπονσεσ το τηισ χονσυλτατιον ωερε ιντενδεδ το ινφορμ αμενδμεντσ το τηε χριτερια.</p> <p>□ σεχονδ βυλλετ ποιντ – Νο πυβλιχ μεετινγσ ωερε ηελδ το εζπλαιν τηε ρεσυλτσ ανδ χομμεντσ ον τηε σιτε ασσεσμεντ συρψεσ (βεχαυσε τηερε ωασ νο συρψεσ – σεε αβοψε). Τηερε ωερε τωο πυβλιχ μεετινγσ ιν θαν 2017 (14 θαν ανδ 18 θαν) φορ πεοπλε το ασκ θυεστιονσ φορ χλαριφιχατιον (βυτ νοτ ρεγιστερ χομμεντσ) ασ παρτ οφ τηε σιτε ετχ. χριτερια χονσυλτατιον. Τηε ρεσυλτσ ωερε NOT δισχυσσεδ ατ τηοσε μεετινγσ ασ τηεψ ωερεν□τ χολλατεδ υντιλ αφτερ τηε χονσυλτατιον περιοδ ενδεδ ατ ενδ οφ τηατ μοντη. Φυλλ χομμεντσ ωερε επεντυαλλιψ πυβλισηεδ ον τηε ωεβσιτε. Τηερε ωερε νο μεετινγσ το εζπλαιν τηε ρεσυλτσ οφ τηε σιτε ασσεσμεντ χονσυλτατιον, ιν θανυαρψ 2017 ορ σινχε.</p>	Y	Noted
68.	10	2.3	Evidence Base Overview	First para. Comment. Suggest redraft and expand to make clearer what it is trying to say. If trying to say that evidence related to housing numbers, mix, tenure and need were developed from these various sources, then say so. Do not understand the ref to 2-part process. The footnote reference to the Housing Numbers, Mix and Tenure report, is only relevant to the first 3 bullet points, so further footnotes needed to remaining bullet points.	Y	Noted
68.	10	2.3	Evidence Base Overview	where are the views of owners and developers recorded? There is nothing in the public domain.	Y	This information is contained within the Consultation Statement.
68.	10	2.3	Evidence Base Overview	Comment. Suggest adding to the third bullet point (or extra bullet point) evidence on the current housing offer in Ewhurst.	Y	This information has been added to the Housing information in section 4.7
69.	10	2.3	Evidence Base Overview	Choice of sites. I agree with the 5 bullet points to guide the choice of sites, but the NP fails to apply these to the sites selected in terms of Site Achievability, Site Capacity, and Deliverability over the plan period as I explain in my comments on Section 12.2.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.

70.	10	2.3	Potential Development sites for housing	Comment. This section needs redrafting in light of the facts we have presented:- First bullet point Comment Has this been fact checked? We ask because there are errors in the other references on calls for sites. Third Bullet point. Comment. This sentence should be deleted. Contrary to what is said here, the Jan 2017 site criteria consultation did not include a request to submit sites. Fourth bullet point. Comment. Delete the part of the second sentence which refers to The Issues and Options Consultation. This was is a Waverley Local Plan consultation exercise, whereas the reference here it implies it was a Ewhurst initiative and connected to the NP calls for sites. Fifth bullet point. Comment. For completeness it should also add that sites in WBC Strategic HLAA were included in the assessments, (as acknowledged in the Shrimplin Brown report).	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
71.	11	2	Site identification and Assessment criteria	Site assessment First sentence. Comment - Suggest delete 'To ensure impartiality', and simply state the facts as written in the rest of the sentence. Why is it necessary to reference impartiality? There are many reasons for employing consultants in neighbourhood planning. If impartiality were the sole reason, they should have been employed simply as a professional mediator of the evidence gathered by residents.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
71.	11	2	Site identification and Assessment criteria	Third sentence. Comment. It is not clear what this third sentence relates to. Is it to the HLAA? If so, the purpose is not correct as drafted. The purpose was specifically to meet "the Waverley allocated housing numbers" - NOT an open-ended "additional housing development".	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
72.	11	2	Site identification and Assessment criteria	"To ensure impartiality, the ... was undertaken by Shrimplin Brown consultants" The NP would benefit from more detail about why SB were chosen in particular. Were other firms considered? As this is an atypical arrangement (getting external consultants to perform the assessment) more explanation may be needed to satisfy a planning inspector.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
73.	12	2	Site identification and Assessment criteria	First complete paragraph, last sentence. Comment Why not simply say: "Sites were assessed against the following criteria". The reason we suggest this is that contrary to what is implied, by referencing acceptability, no site can comply fully with each and every one of these bulleted criteria. Nothing is black or white in planning. The important thing is to assemble the evidence. Judging acceptability then requires appropriate weightings.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.

74.	12	2	Site identification and Assessment criteria	Choice of sites Comment Don't understand the need for a separate heading. These criteria are all part of the site assessments. Accordingly, this text should simply read 'The appraisal of sites were further guided by.... ' These are exactly the words used in the Shrimplin Brown report (page 8).	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
75.	12	2	Site identification and Assessment criteria	"Sites would be considered acceptable, providing the following criteria were met:" This list is unclear. When listing "Area of Outstanding Natural Beauty (AONB)." do we mean that the criteria is that the development should be outside of the AONB altogether? Not impact upon the AONB visually? This needs to be made explicit so that a planning inspector can grasp it clearly. Ditto for the rest of the list.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
76.	12	2	Site identification and Assessment criteria	Page 12 of the document discusses the site criteria that the Choice of the Sites was guided by. One of these was site capacity based upon a density of 13 dwellings per hectare (dph) for sites on the edge of the settlement and 23 dwellings per hectare for sites on or closer to the centre of the village. The above seems to be based on the community consultation undertaken in 2017, however, where the relationship between this and the Government's aspiration to boost housing within national policy lies is not clear. Also, the edges of Ewhurst (and other settlements) vary in density, such that a blanket approach of 13 dph to assessment of development on all edges of the settlements needs further justification. Recommendations1. It is recommended that the Forum undertake a density character analysis of the settlements of Ewhurst, Ellens Green and Cox Green to provide sufficient evidence to back up this approach,2. Include plans showing the various density character areas,3. In doing so, it is believed this will influence the approach and policy such that more flexibility and higher densities would be justified in some areas.	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
77.	13	3	Vision and Objectives	Section 3 Vision Statement. This states: In 2032, the Parish will still be predominantly rural and undeveloped providing an attractive countryside setting for the village of Ewhurst (including g Ewhurst Green), the hamlet of Ellens Green and the scattering of mainly historic rural development. In this context it would help to quantify the proportion of the parish which is currently woodland, agricultural or developed, otherwise this is just a vague wish which has little meaning.	Y	This information has now been included in the Section Ewhurst & Ellen's Green Today

78.	11-13		Site Identification and Assessment Criteria Onwards	<p>This section is very muddled. • The first statement is very important. Put it in a box/make it a different colour -> at the moment its importance is diluted. • Decide on the terminology and stick with it. If “site identification assessment criteria” are those set by the parish then use them on Page 12 in the second paragraph instead of “sites which would be considered acceptable” rather than just dropping it in with no source in the first bullet point of the choice of site list. The criteria/principles were endorsed by the 2017 survey. • Consider: Development process for assessment criteria: with timeline down the side Parish council/aspirations/planning policies Independent review by JG/CSO Endorsed by community since 2017o Translated into specific [text from 3.9 of SB report]• (ensure link to SB document where it says conducted by SB)• “The Assessment” mentioned on the last line of Page 11 – as you read it this refers to the public consultation. • The list of criteria on Page 12 aren’t criteria but are headlines. • “The choice of the sites” on Page 12 – choice can be interpreted as subjective and whilst not incorrect, “site screening”, or “site review process” or “site assessment principles” sounds more robust/impartial. • Reference 7 at the bottom of Page 12 – where it says “January 2017 of a maximum density” the “of a” should be replaced with “endorsing”.</p>	Y	This section has now been removed as the plan is no longer looking to allocate sites for development.
79.	14	3	The Neighbourhood Plan/ Vision	<ul style="list-style-type: none"> • Extra g accidentally put in “including g Ewhurst Green” in the second paragraph of the Vision Statement. 	Y	Agreed
79.	14	3	The Neighbourhood Plan/ Vision	<ul style="list-style-type: none"> • Important/adds weight to say it was agreed on by the community in 2015 parish survey (key principles agreed by the community). 	Y	The influence and involvement of the community has been covered in the earlier sections of the plan and it is not necessary to repeat it.
80.	15	3	Objectives	"To maintain the separate, identify ..." Typo - should read "To maintain the separate identity ..."	Y	The aims / objectives have been amended to read as aims and objectives and typos have been corrected.
80.	15	3	Objectives	"and settlements and developments beyond the Parish boundary" Typo - Parish boundary doesn't make sense in this context. I assume the author meant "settlement boundary"	Y	This refers to the proximity of Rudgwick to the south and has been made clearer.
81.	15	3	Objectives	<ul style="list-style-type: none"> • (Sections 5/6/onwards should reflect this order and terminology should be consistent). • 1.Housing, goal b), objective i) – isn’t an objective. • 1.Housing, goal b), objective ii) – you are not proposing anything beyond AHN3 of the local plan. • 4.The countryside etc. – omits reference to within settlements. - The language again means the objective isn’t an objective. 	Y	The objectives have been re-ordered to reflect the order of the policies. The aims / objectives have been amended to read as aims and objectives and typos have been corrected.

82.	15	3	Objectives 3.3	<p>Some of the aims/objectives do not read as aims or objectives, for example 1b. (i) and (ii), and 4a. As stated in within this response, some of these matters are dealt with at the strategic level, and should not be repeated in the EEG NP.</p> <p>We would also note that that the fifth aim/objective doesn't appear to make sense.</p> <p>We would also suggest that the sixth goal and aim/objective do not match. One is very supportive whereas the other appears to be very restrictive.</p>	Y	The aims / objectives have been amended to read as aims and objectives and typos have been corrected.
83.	15	3	Objectives 3.3	<p>Settlements. I think a typo under Goal - should surely say "To maintain the separate identity...."</p> <p>Built Environment. Another typo under Goal - should say "To maintain and enhance the character, built environment and heritage..."</p> <p>Countryside & Natural Environment. Under Goal - why look after the rich biodiversity etc. only OUTSIDE the built-up areas of Ewhurst and Ellens Green? Whilst the areas of woodland all occur outside the Settlement Boundary, we do have the village pond and area around the cemetery gates within the built-up areas that need protecting from development.</p>	Y	The aims / objectives have been amended to read as aims and objectives and typos have been corrected.
84.	16	3	Objectives 3.3	7. Pedestrians, traffic and transport – what about addressing existing traffic issues (quiet lanes are existing issues).	Y	Existing levels of traffic, and that resulting from permissions already granted, are not something that the Neighbourhood Plan can address. It can however, look at the impact of any new development on the level of traffic and if this is likely to create significant issues, it may be possible to identify ways to reduce this. However his Neighbourhood Plan is not proposing any further significant levels of development so the scope is likely to be limited.
85.	16	3	Objectives 3.3	7. This is an objective I fully agree with, but it does not go far enough and again is not lived up to in the site selection as I shall explain in my comments on Section 12.2 .	Y	No sites are now allocated within the Neighbourhood Plan.
85.	16	3	Objectives 3.3	7. I would like to see this heading also relate to cyclists, not just vehicles and pedestrians.	Y	The aims / objectives have been amended to read as aims and objectives and typos have been corrected.

85.	16	3	Objectives 3.3	I also would like to see a further objective under this heading relating to upkeep of the roads that serve Ewhurst. This should read in terms of something along the lines of - Goal 'To seek to ensure that local roads in and out of the Parish are maintained in a satisfactory and safe state of repair. Aim/Objective 'To improve safe vehicular and cyclist journeys by lobbying to ensure road surfaces are not allowed to deteriorate to a degree that is either a risk to safety and physical comfort or to harm to actual vehicles/cycles'. Witness as an example the appalling road surface from Ewhurst Green approaching Somersbury Lane that we have endured for years.	Y	Road maintenance is a matter for Surrey County Council Highways and is outside of the scope of the Neighbourhood plan, which deals with planning matters.
86.	17	4.1	Ewhurst Today Location	We would advise you make clear that EEG is located in Surrey, but borders Sussex. It is currently unclear whether the Parish is cross-county. 'To the North are the Surrey Hills AONB' We would advise you to make clear whether this is north of the Parish or to the north of Ewhurst settlement'.	Y	Agreed
87.	17	4	Ewhurst Today	This whole section is confusing. Does it refer to 'Ewhurst only' today or 'Ewhurst and Ellen's Green' today? For example, the maps on Pages 19-21 cover only the Ewhurst Village settlement area and the implication is the figures etc. in the narrative refer only to Ewhurst Village. All areas of the parish should be included, and the various statistics broken down by settlement.	Y	The Section is renamed Ewhurst and Ellen's Green Today. Unfortunately much of the data is not available in sufficient detail to enable it to be presented at a more local level.
87.	17	4	Ewhurst Today	In addition Figure 3 of the whole parish should be enhanced to show the Area of Outstanding Natural Beauty and Areas of Great Landscape Beauty and also highlight the areas of settlement Ewhurst, Ewhurst Green Ellen's Green and Cox Green. The online version of the OS map is very blurred indistinct and requires enhancement given that this will be how the majority of views will be made.	Y	New mapping has been included within the plan for clarity.
88.	17	4	Ewhurst Today	<ul style="list-style-type: none"> • "Identifies the challenges" – not really 	Y	This section now concludes with a summary of what the key challenges are as identified through this work.
88.	17	4	Ewhurst Today	<ul style="list-style-type: none"> • "a summary of residents views" – no it doesn't 	Y	This reference has been removed as this is contained within an earlier section
88.	17	4	Ewhurst Today	<ul style="list-style-type: none"> • "establishes policies...etc." – no it doesn't 	Y	This reference has been removed as this is contained within later sections of the plan
89.	17	4	Location	Hierarchy classification – needs a reference and a date as by 2032 it may have changed.	Y	Reference included
90.	18	4	4.1 Location	Has the village boundary been clearly defined?	Y	This is shown in Figure 4
91.	18	4	Village Boundary	Missing Delineation of the new Built-Up Area Boundary.	Y	This is shown in Figure 4

91.	18	4	Village Boundary	The Neighbourhood Plan should define a new built-up area (or settlement) boundary. This should encompass (i) the already developed/built-up area and (ii) the “to be developed i.e. built-up area” of sites contiguous to the settlement which have been given planning permission since the last boundary was drawn. This new built-up area (or settlement) boundary should be shown on the Proposals Plan in the neighbourhood plan.	Y	A supporting note has been prepared to provide the reasoning for each proposed change to the village boundary.
91.	18	4	Village Boundary	Defining a new built-up area boundary should have been included in the draft plan BEFORE consultation was undertaken because it is only by having the boundary to hand the community can make sense of several policies in the draft plan.	Y	Including a proposed new settlement boundary at this stage is appropriate.
91.	18	4	Village Boundary	Defining an up to date built-up area boundary is necessary because the LPA will have problems implementing and enforcing some policies in both the neighbourhood plan and the recently approved Local Plan without it: - Several neighbourhood plan policies depend on a distinction being made between development and change within (i) the settlement/built-up area and (ii) the countryside. - For instance unless a new built-up area boundary is defined, it is possible that speculative developers will seek to argue that proposals for filling in gaps in existing development along both sides of Cranleigh Road, around Ewhurst Green and down Wykehurst Lane meet the definition of infill within the built-up area. - Likewise several Local Plan policies depend on a distinction being made between inside and outside the settlement/built-up area boundary.	Y	Noted

91.

18

4

Village Boundary

Defining the Built-up Area boundary and Identifying Local Open Space. Y

Another reason for defining a new built-up area boundary to include the planned building area of recent planning consents arises from the Firethorn Farm appeal decision. The appeal decision gave permission for housing and public open space – the latter being the triangle of land to the east of Larkfield, However at present there is no guarantee that the triangle area will be made available as public open space. Until the Parish Council acquires the area as public open space – and there appears to be no undertaking or condition which requires the area to be given to the Parish Council or which requires the land to be maintained by its owners as public open space, control of that area will remain in the hands of the original landowner or developer. While the future of the triangle of land remains outside the control of the Parish Council, it is possible that those who control it will see it as a future potential development site.

The neighbourhood plan has an opportunity to secure the future of this triangular area of land as public open space by:

- Drawing the new settlement/built-area boundary tightly around the area to be developed for houses; and
- Designating the triangular area of land as local open space.

Likewise a new built-up area boundary needs to be drawn for the new built-up area of the Chandrosa site.

Drawing a tight new built-up area/settlement boundary and designating local open space are two of the most useful tactics left available for the neighbourhood plan to protect the countryside, the local environment and local open space from the view of developers that all areas surrounding settlements are potential development sites.

A supporting note has been prepared to provide the reasoning for each proposed change to the village boundary.

92.	19	4.2	Fig 4 Settlement Boundary map	<p>Comment Text alongside Fig 4 is not correct and should be amended. The description of this map says it 'takes cognisance of recent planning decisions and therefore encompasses land which has been developed i.e. built on but not land where only building permission has been granted'. This is not a correct description of a settlement boundary. A settlement boundary map should in fact show both built /commenced development and also land with planning permissions which physically relate to the settlement boundary. The description of Fig 4 should be corrected to simply state "it takes cognisance of only those planning permissions concluded by early 2018".</p> <p>Explanatory note: Note Fig 4 is actually the settlement boundary as it was in early 2018 when it was last given a 'factual update 'by Waverley. Backward Point is included, not because building work had started, but because it had completed its journey through the planning process. Neither Chanrossa site nor the Firethorn site are included in that update because at that time they had not completed their planning journeys.</p> <p>Comment: We suggest that now Ewhurst has met its housing numbers allocation and there are no sites allocated in the NP, the settlement boundary should be factually updated by Waverley, to include the Chanrossa and Firethorn sites. This would make clear where the countryside begins (for planning purposes) and provide Ewhurst with protection against further future development once the plan is made.</p>	Y	A supporting note has been prepared to provide the reasoning for each proposed change to the village boundary.
93.	19	4.2	Settlement Boundary	<p>The settlement boundary used in Figure 4 is from the emerging Local Plan Part 2 (LPP2). The current adopted settlement boundary is that from the Local Plan 2002. The emerging Local Plan Part 2 was planning to undertake this task, however if EEG Parish Council wish they may have to take responsibility to undertake this matter as part of the EEG NP. If EEG Parish Council choose to amend the settlement boundary within the EEG NP then you will need to evidence and justify changes made to the EEG settlement boundary, in comparison to the settlement boundary from the 2002 Local Plan. It would also be appropriate to include a 'before' and 'after' map of the settlement boundary changes.</p>	Y	A supporting note has been prepared to provide the reasoning for each proposed changes to the village boundary.
93.	19	4.2	Settlement Boundary	<p>If the EEG NP does not intend to alter the settlement boundary through the NP then Figure 4 should use the settlement boundary adopted as part of the Local Plan 2002.</p>	Y	Noted
94.	19	4.3	Heritage	<p>Factual Correction. There is no such designation as a site of 'National Heritage significance', we therefore recommend this text is removed or amended.</p>	Y	Agreed

95.	20	4.4	Ewhurst Environment	By cramming three important maps onto a single page, the details are illegible. These three maps should be broken out onto three separate pages so that the detail is clear. Again, planning inspectors should not be made to struggle when extracting relevant information. This is particularly relevant as the map shows a flood zone bordering two of the assessed sites in the HLAA	Y	The maps have been corrected, increased in size and more clearly produced.
95	20	4.4	Ewhurst Environment	Two maps Again these should be broken out onto separate pages and made as large and legible as possible. There's no reason to stuff them onto a single page.	Y	The maps have been corrected, increased in size and more clearly produced.
96.	20 - 21	4.4	Ewhurst Environment	Our previous comments regarding the settlement boundary apply to all the maps within 4.4. As inferred, if the EEG NP does not intend to alter the settlement boundary through the NP then the maps should use the settlement boundary adopted as part of the Local Plan 2002.	Y	Noted
96	21 - 21	4	Ewhurst Environment	We have a number of comments on the different maps. Firstly, we would encourage to increase the size of the maps, as they are currently very small for the level of detail they attempt to provide. Additionally, for all the map it could be that creating greyscale maps would allow for designations in colour to be seen more clearly. For example the AGLV area to the South currently appears very similar to green areas of land on the base map In relation to the first map AGLV, Green Belt, and AONB:	Y	The maps have been corrected, increased in size and more clearly produced.
96	22 - 21	4	Ewhurst Environment	<ul style="list-style-type: none"> It is currently unclear that the area to the North of the settlement is both Green Belt and AGLV. 	Y	This has been clarified
96	20-21	4	Ewhurst Environment	The Community Assets and Flood Zone map:- What is defined a community asset? We do not believe it is a planning 'land designation'. It is not clear how these areas have been identified/designated, and why it is considered a 'key biodiversity or land designation'. We would advise you to specify which Flood Zone is shown on the map, e.g. Flood Zone 2 or 3.	Y	The Community Assets are now listed alongside Policy EEG C3 and are the locations to which this policy would apply. The map has been made more clearer and the correct Flood Zone referenced.
96	20-21	4	Ewhurst Environment	Conservation Areas and Heritage Areas map:- What is defined as a Heritage Areas? This is not a defined planning term. We would advise its removal as it is not clear why it is considered a 'key biodiversity or land designation'. We would query what is meant by the term 'conservation verges'; we are unsure of its meaning and do not consider it a defined 'key biodiversity or land designation'. Given our comments on this matter, we would welcome to opportunity to comment on a revision of these maps.	Y	SEE COLUMN M

97.	20 - 21	4.4	Ewhurst Environment	<p>Maps Comment: It is very difficult to pick your way through these maps, perhaps because each individual map is trying to show different designations in one map with a number of different colour overlays - inhibiting clarity. The all-layer consolidated map is impossible to disentangle.</p> <p>Maps Comment: the maps extend only part way into the Ewhurst Green area. Suggest if possible they show a more extensive area southwards.</p> <p>Comment: Maps. Can we suggest you review the presentation of the maps to do justice to the amount of work that's gone into gathering all the data and to assist the way in which these designations were taken into account in the development of the NP. Conservation Areas and Heritage Areas map (and also the all -layer Consolidated View map)</p> <p>Comment: These maps should be redrawn to include the correct Ewhurst Conservation area. It is currently incorrectly drawn. It does not take into account the adopted Dec 2016 Ewhurst Conservation Area appraisal which extended the CA further south than shown on both sides of The Street to the boundary with Mount Close (east) and Broomers Lane (west).</p>	Y	The maps have been corrected, increased in size and more clearly produced.
98.	22	4	Housing	<p>Reference. We would suggest you reference the source of information and date for the references to 923 occupied households and 84 affordable homes.</p>	Y	Agreed
99.	22	4	Housing	<p>"Ewhurst has a tenure breakdown which is in line with England as a whole" - what on earth does this mean?</p>	Y	Tenure relates to the type of housing it is - rented / market etc.
100.	22	4	Connections	<p>Again, is this just for Ewhurst Village or does it include the hourly bus services from Ellen's Green, Cox Green to Horsham and Cox Green Ellen's Green to Guildford via Cranleigh?</p>	Y	This has been clarified
101.	22	4	Connections	<p>The nearest railway station is at Ockley. Gomshall, Shalford, Chilworth, Holmwood, Warnham are all nearer than Guildford/Dorking/Horsham.</p>	Y	This has been clarified
102.	22	4	Connections	<p>"The nearest railway station is located 10 - 13 miles from the main Ewhurst Settlement" Typo - should read "stations are located"</p>	Y	Agreed
102.	22	4	Connections	<p>" by an hourly public bus service with additional links to Horsham and Dorking but with a far more limited service" Grammar - this could do with clarification. e.g. " by an hourly public bus service with Guildford via Cranleigh. In additional there are bus links to Horsham when changing at Cranleigh. There is another service direct from Ewhurst village to Dorking but this is a far more limited service."</p>	Y	Agreed
103.	22	4	Connections	<p>The second sentence should say "The nearest railway stations are located..."</p>	Y	Agreed

104.	22	4	Connections	Ockley and Gomshall railway stations are much closer - but no frequent bus services to them; even the hourly Ewhurst- Guildford bus only stops at Guildford railway station once a day. The Ellens Green-Horsham bus doesn't go to Horsham railway station either.	Y	This has been clarified
105.	22	4	Connections	The plan is factually incorrect at Para 4.5, repeated in Section 10. The nearest railway station to Ewhurst is Ockley which is circa 5.7 miles from the centre of the village. On Weekdays and Saturdays there is an hourly service to London Victoria timetabled at 1hr and 8mins making this the shortest total journey time possibility into London under most scenarios. The station is short of car parking space as in the last days of British Rail the car park was sold. The Council along with Waverley should be pushing Southern and Network Rail to improve provision.	Y	This has been clarified
106.	22	4	Connections	- "southwest of the village" – include distance to Cranleigh which reinforces coalescence (or swallow tiles).	Y	Agreed
106.	22	4	Connections	Housing: It is now 2019 and the housing stats are based on 2011/13 data.	Y	2011 and 2013 data is the most up to date in this respect.
106.	22	4	Connections	- need to update to reflect recent planning decisions otherwise it is not a true representation of the village (see WBC 5 year housing supply statement 04/19).	Y	Noted
106.	22	4	Connections	- 84 affordable homes (WA/2015/1903 references 9 at Backward point and 5 year supply statement references 15 at firethorn)	Y	Noted
106.	22	4	Connections	- Backward point are advertising for shared ownership	Y	Noted
107.	22	4	Connections	First para. Comment: Amend, as Cranleigh lies West of Ewhurst (check OS map) - not South West.	Y	Noted
107.	22	4	Connections	second para. Comment Should be corrected in line with the facts. Bus services in Ewhurst are more restricted than this statement implies. Monday to Saturday Ewhurst bus service to Cranleigh/Guildford is hourly until early evening and nothing until the last bus from Guildford. Sunday service is hourly only during the day til about 5pm. No last bus to Ewhurst on a Sunday. Sunday service was only recently introduced by the previous county councillor and is particularly vulnerable to county council cuts.	Y	This has been clarified

107.	22	4	Connections	Comment: This whole 4.5 section is too brief. And where are the 'so what?' implications of what is being described? A key implication is it demonstrates and underscores the limited sustainability of Ewhurst for planning purposes. For example, expand to mention need to travel out for work, for major shops, arts and entertainment, restaurants, choice of pubs etc.	Y	A short summary of what the key issues are in the Parish has now been added to the end of this section.
107.	22	4	Connections	Comment: Suggest add connections information on Ellens Green. It is ignored in the existing text.	Y	Agreed
108.	22	4	Connections	These are some buses at weekends although the comments state that there are none.	Y	This has been clarified
109.	22	4	Population and Housing	Comment. We suggest these two sections are expanded. They are extremely thin and shallow and paint a wholly inadequate picture of the demographics and housing situation in the parish. It's important to paint a full picture because the current demographics and housing situation are hugely relevant to building NP policies to meet the housing and other needs of Ewhurst and Ellens Green in the future. Such evidence can be used to justify policies framed in later sections of the NP through cross references. Also, the stats in these sections seem to have been plucked randomly bearing no relation to any further policy direction. The evidence documents completed for the NP in 2016 contain much excellent, relevant evidence to draw upon - as indeed James Garside's SEA made use of. (But beware that section of his report does contain some errors - partly down to the cutting and pasting involved.)	Y	Data issues have been rectified and some gaps in information have been filled. Links to other sources of evidence have now also been added.
110.	22	4	Population and Housing	A number of references are made throughout the document to addressing Ewhurst's local needs for housing. This is both in terms of housing numbers and the non-allocation of housing sites and housing mix. The supporting evidence for the approach taken appears to be provided by the 'Ewhurst and Ellens Green Housing Needs Survey undertaken in October 2013. The generally accepted view is that Housing Needs Surveys have a 'shelf life' of between three to five years. This is the only document of its type referred to in evidence base and therefore we have concern that this is significantly too out of date to be relied on. Recommendation - To ensure that the evidence base is sufficiently robust we would recommend updating the Housing Needs Survey.	Y	It is acknowledged that the Housing Needs Survey is dated. As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. The development already approved will have been assessed for its impact on infrastructure by Waverley Borough Council though the consideration of the relevant planning applications.

111.	22	4.7	Housing	First para. second sentence Comment. Firstly, amend to make clear it is referencing smaller villages in rural areas in Waverley. (That is how it is referenced in the Housing tenure report which we assume must be the evidence base for this statement). In addition, in order to make sense of the statement that semi-detached and detached houses dominate, it needs to be benchmarked against elsewhere in Waverley. (FYI the proportion in the parish is substantially higher than in Cranleigh, and also higher than across Waverley as a whole - 84% E & EG; 67% Cranleigh). This has a relevant bearing on how to meet the housing needs of younger people and those on lower incomes in E & EG. Which in turn has an impact on the social mix in the parish.	Y	A comparison with the mix of housing across the District has now been included within this section to provide a comparison.
111	22	4.7	Housing	First para, third sentence Comment What is the point of this 18 units random statistic? More relevant would be draw out statistics about the private rental market to demonstrate inadequacy in Ewhurst.	Y	This data has been updated to make it more relevant
111	22	4.7	Housing	Second para - First sentence Comment Sentence is factually incorrect. It has been copied and pasted from the text in the footnoted Rural Housing Enabler Report (page 6). That text is out of line with the correct info in the table in that report. This table shows a very distinct difference Ewhurst and England across all tenures. Anyone with an ounce of common sense would know that social housing in rural Ewhurst would be v different from social housing across England as a whole. The reality is Ewhurst 8%, England 19%.	Y	This has been updated
112.	23	5	Neighbourhood Plan Policies	Policy area box – order should be as per section 3.	Y	The objectives have been re-ordered to reflect the order of the policies.
113.	24-26	6	Community Facilities, Assets and Service Policies	No mention is made of either the Parish Church or the Baptist Church both of which provide community facilities, e.g. Glebe Centre Coffee mornings, Mothers & Toddlers at both churches; this is in addition to their Christian and pastoral provision.	Y	These have been added to the text.
114.	24-26	6	Community Facilities, Assets and Service Policies	Under the description of Ellens Green it lists the hall, children's play area and a public house. Unfortunately the Wheatsheaf Pub closed many years ago.	Y	SEE COLUMN M
115.	24-26	6	Community Facilities, Assets and Service Policies	• Are these 2 or 3 policies in this section the only ones to have come out of the relevant evidence report?	Y	The EEG NP sits alongside the Waverley Local Plan. The Waverley Local Plan also contains policies in relation to community facilities. There is no need to repeat these. Support is given for new facilities should proposals come forward, but no locations have been identified.

115	24-26	6	Community Facilities, Assets and Service Policies	<ul style="list-style-type: none"> The thrust of this section is about safeguarding and enhancing/increasing village facilities and assets. However, from the textual descriptions (and more substantially and clearly in the evidence reports) there is another important message to get across in this section. In particular, limitations on capacity of community facilities etc. within the parish (see detailed evidence document) have a bearing on the ability of the parish to expand to accommodate new housing development (not only beyond the 120 in the pipeline, but any proposals for further development). This demonstrates that Ewhurst is indeed a village with limited facilities and that proposals to go beyond our housing allocation as proposed in Section 12 would not be sustainable - a point that should also be made in Section 12. 	Y	SEE COLUMN M
116.	24	6	EEG C1	We consider that the title 6.2 could be removed in its entirety as 6.1 sufficiently introduces and captures Policy EEG C1. If not, we would advise that the 6.2 title and the EEG C1 Policy is amended to "Community Assets of Community Value".	Y	Agreed
116	24	6	EEG C1	An Asset of Community Value refers to an asset which has specifically registered under this designation; use of the term to refer to other community assets is confusing and an inaccurate use of the use.	Y	This has been clarified
116	24	6	EEG C1	Prior to the Policy, in the supporting text, it could be useful to add further supporting text to introduce and explain how the Parish Community, Facilities and Assets 2016 has informed the Policy.	Y	SEE COLUMN M
117.	24	6	EEG C1	Grammar/wording - "will be supported" is poorly phrased and implies absolute support, regardless of circumstances. Again "will be particularly supported" isn't correct grammar at all. I suggest rewriting the sentence to be assertive instead e.g. "Proposals will contribute to the delivery of new community facilities, extensions to existing community facilities or necessary infrastructure improvements."	Y	Using the wording 'will be supported' is the recommended approach to writing planning policies and is not interpreted to mean there is absolute support. it is a requirement that all relevant policies are taken into account when determining an application and wherever possible they should be written in a positive manner.
117	24	6	EEG C1	Each policy should also be followed by a section explaining which parts of the planning framework this conforms to. There are good examples in the (made) NP for the nearby town of Petersfield in Hampshire.	Y	Agreed
118.	24	6	Community Facilities, Assets and Service Policies	6.1 is either an introductory paragraph i.e. no heading box is needed, or it should have a policy.	Y	Noted
118.	24	6	Community Facilities, Assets and Service Policies	Section 6.2 "Assets of Community Value" – a legal term which doesn't mean "extended community" mentioned later.	Y	SEE COLUMN M
118.	24	6	Community Facilities, Assets and Service Policies	What about protecting those who do have community value.	Y	SEE COLUMN M

119.	24	6.1	Community Facilities, Assets and Service Policies	2nd para. Comment Suggest it's important to recognise the importance of rural spaces close to the village, including the network of footpaths within the village - a feature picked up in the Ewhurst Conservation Area Appraisal. There is too much focus in this para on benefits deriving from wider countryside.	Y		Agreed, further detail has been added to the text
120.	24	6.2	Assets of Community Value	Footnote 16. Comment. Suggest delete reference to ACV and Bulls Head and WBC officers' report. It is irrelevant. The application was not about change of use. The point would be relevant if down the line the pub were threatened with closure through change of use or any other reason.	Y		Agreed
121.	24	6.2	EEG C1	Assets of Community Value Comment: Policy C1 is titled Assets of Community Value, but the policy content is not specially about ACVs but about community facilities and infrastructure generally. Suggest policy is re-titled and appropriate justification for any policy given, as the current preceding para is not relevant.	Y		SEE COLUMN M
122.	25	6	Community Facilities, Assets and Service Policies	"The report also confirms that key facilities are at capacity and so there is an identified need for new provision" This wording is inexact - which are the key facilities? what new provision is required exactly? - a planning inspector could also misinterpret this as a desire for new development on the basis that new facilities are required.	Y		SEE COLUMN M
122.	25	6	Community Facilities, Assets and Service Policies	"The report suggests that some facilities are currently not meeting the needs of users" "Some" here is vague and unclear - it needs to be made explicit by listing the specific facilities or removed from the NP.	Y		SEE COLUMN M
123.	25	6	Recreational Facilities and open spaces for community use.	"Policy EEG C2" – this paragraph could be moved to the intro 6.1.		Y	SEE COLUMN M
123.	25	6	Recreational Facilities and open spaces for community use.	6.3 education – if you don't have a policy then this doesn't belong here and should be moved to section 4.		Y	SEE COLUMN M
124.	25	6.2	Recreational Facilities and open spaces for community use.	Assets of the community. The building on the rec cannot really be referred to as a youth and sports centre as the youth club is no longer and the only sport that is played is football on the rec.	Y		Noted

125.	25	6.2	Recreational Facilities and open spaces for community use.	Para 2, after 'Memorial Hall' add There is an excellent network of footpaths and bridleways which provide links within the village as well as easy access to the countryside. Open Access land comprises the woodland on Pitch Hill, which adjoins that in neighbouring parishes, together with the greens within the village settlement. Pitch Hill is a significant viewpoint from the Surrey Hills, and there are many places in and around the village with views towards the hills.	Y	This information has now been included in order to supplement the introduction to this section.
126.	25	6.2	EEG C2	Policy C3. Comment. Where is specific justification for this vague and general policy? How is it different from, or enhances, the Waverley Local Plan policy?	Y	SEE COLUMN M
126.	25	6.2	EEG C2	Comment There are 3 policies in this section, which, in the light of our comments, we have difficulty understanding why there are three, rather one. Or are we missing something? If you have 3 policies you need a justification for each.	Y	There is no need to provide a written justification for every part of the policy. This is only required where additional information is necessary or helpful.
127.	25	6.2	EEG C2	Under Policy EEG C2 add: c. The network of public rights of way should be maintained. Any new estates should link into and augment this network rather than forming private enclosed spaces. Open Access should be retained should there be a change of ownership, and opportunities for further Open Access land should be pursued. Views to and from the Surrey Hills should be preserved.	Y	SEE COLUMN M
128.	25	6.3	Education	Tabulation Pre-school education. Comment Suggest info is fact-checked with Rainbows End and amended accordingly. From our knowledge and a quick check on website, age range should be 2 - 4. Check also maximum numbers of children (ref capacity). Also add reference to where the children come from (as Agreed for Infant School). Our understanding is that a significant proportion come from outside the parish.	Y	A pre-school is a private business, key data will be updated but the proportion of children from outside of the parish is not of relevance to any of the policies within the Neighbourhood Plan.
128.	25	6.3	Education	Page 25 Tabulation Preschool education. Comment Suggest amend establishment year - there has been pre-school education in the village hall since before 1992. (I was Secretary of the playgroup in second half of 1980s)	Y	Agreed
129.	25	6	EEG C3	As expressed previously, we consider that this policy may be overly onerous and in conflict with LPP1 policies. There is no measure of whether there is a 'need' to keep the facility. We would also suggest that the wording of the current Policy is slightly confusing, as if "net loss" is proposed then why would 'equivalent or enhanced facilities' be necessary? We would consider that further work is needed on this Policy.	Y	SEE COLUMN M

130.	25	6	EEG C3	The policy states at point b. facilities are easily accessible to the community. The phrase 'easily accessible' is not defined which would make the policy harder to operate. Recommendation: Define the term with regards to distances	Y	SEE COLUMN M
131.	25	6.3	Education	We would query the need for this text, appears to be mainly factual and perhaps would be more appropriate to the 'Ewhurst Today' section.	Y	SEE COLUMN M
132.	25	6.3	Education	Ewhurst school is a state school, not a primary, but part of the primary level of education.	Y	Noted
133.	25	6.3	Education	The Sustainability Appraisal Assessment for the NP (Sep 2018) assessed a policy called C4 – School Provision. It commented negatively that the policy could potentially constrain new development in the parish. The policy has been removed from the NP, but it appears that the associated text has remained. It is not good practice to retain the statements about school capacity, in particular about some being unable to cope, without an associated policy. Recommendation: Remove section 6.3 from the NP or re-instate a more suitable worded policy	Y	SEE COLUMN M
134.	26	6	Education	"The Duke of Kent School ... The Hurtwood School" For these to make sense for inclusion, the NP should ideally state how many children from the parish each currently caters for. As fee paying schools, they can't be relied upon to absorb additional numbers that arise from more development in the village.	Y	It is correct that fee paying schools can not be relied on to take additional children. Surrey County Council will forecast the number of children to arise as a result of development within any given area, this includes an allowance for the numbers likely to go to fee paying schools. It is their responsibility to ensure that there are sufficient school places and it is not necessary for the Neighbourhood Plan to explore the number of children at fee paying schools to any greater level of detail.
134.	26	6	Education	"Rainbow's End Pre-School is at capacity and is unable to cope with increased pupil numbers" See above - not based in fact as far as I can tell. Their capacity depends on staffing levels, which in turn depends on demand. The NP should really ascertain the true maximum and use that instead of speculating.	Y	A pre-school is a private business, their capacity depends on the physical constraints of the buildings and staffing levels and the wishes of the business itself. Key data will be updated and reference to 'reaching capacity' will be removed. Other pre-schools could set up if there is a market.
134.	26	6	Education	"During the course of the Neighbourhood Plan process, issues arose concerning" Where did these arise? How were they documented? It should reference any relevant policies within the document. In this case the traffic concerns should reference policy EEG T1	Y	SEE COLUMN M

135.	26	6.3	Education	<p>Page 26. First para (after tabulation) Comment: with regard to references to pre-school capacity problems in the village hall, has the NP team checked out opportunities for Rainbow’s End or other pre-school groups to set up in other parish venues? We know for example a pre-school group used to operate from the cricket pavilion. This is relevant since the NP is an opportunity to address general capacity issues in support of community facilities and services. The numbers in the Local Plan are a given and are happening, but what are the impacts of even greater housing numbers if proposed Section 12 of the NP is retained?</p> <p>Page 26. Second para after table (capacity of Ewhurst Infant School). Comment: The statement the school has the ability to cope with Ewhurst’s min 100 numbers in the WBC Local Plan, is good. But, given Section 12 policy in the draft NP, as currently written, would it have the capacity to accommodate housing numbers up to a minimum 160? If the NP team don’t know, they should least ask the question.</p> <p>Page 26 final para (bulleted) Comments:</p> <ul style="list-style-type: none"> • second bullet point This seems to conflict with what is said in the County Council’s School Organisation Plan, referenced in the earlier paragraph. • third bullet point (safety of road crossing). Suggest amend to refer to ‘road crossings’ plural. each have their own separate crossing. • Having identified issues, why is NP not drawing conclusions on their implications and suggesting an agenda for future PC activity. Have those involved with building the evidence base on community facilities etc. been involved in addressing this question of what could be done? Suggest the implications of being a third-tier village with limited services and difficult road crossings and lack of pavements could have 	Y	A pre-school is a private business, their capacity depends on the physical constraints of the buildings and staffing levels and the wishes of the business itself. Key data will be updated and reference to 'reaching capacity' will be removed. Other pre-schools could set up if there is a market.
136.	26	6.3	Education	<p>Educational establishments: No mention of University College London’s Mullard Space Science Laboratory as an educational establishment. MSSSL is entirely within the civil parish, and has many full-time PhD students, and regular visits by groups of MSc students from UCL in London. There is a huge pressure for affordable accommodation for these students.</p>	Y	SEE COLUMN M
137.	27	7	Countryside and Environment	<p>Title should be Countryside and Natural Environment Policies (to keep it consistent with page 15).</p>	Y	Agreed
137.	27	7	Countryside and Environment	<p>Paragraph 2, 3, and 4 to “WW9” – repetitive/ already sits in section 4.</p>	Y	This is noted and has been reviewed

138.	27	7	Countryside and Environment	More should have been made of the work Agreed by LEAP on the environment.		Y	SEE COLUMN M
139.	27	7	Countryside and Environment	One of the weaknesses identified by the Independent Examiner for the Woore Neighbourhood Plan was the lack of a Habitats Regulations Assessment Screening Report. The Examiner stated that, "I was not satisfied with this approach as being legally compliant and requested a full Habitats Regulation Assessment Screening Report, and to be subject to public consultation. "In looking at the evidence base for the NP it is not clear whether this issue has been addressed to pass the "basic conditions" test. Recommendation Undertake a Habitats Regulations Assessment Screening Report.			The responsible Authority for the purposes of the Habitats Regulations is Waverley Borough Council. We will take their advice on the needs or otherwise for such an assessment.
140.	27	7	Countryside and Environment	There is no policy here on preserving hedgerows, trees, wildlife corridors, the woods around the stream etc.! Policy EEG E2 is much too weak.	Y		Many of these matters have been covered by the Waverley Local Plan but in response to the comments we have reviewed the policy to see if and where it can be strengthened.
140.	27	7	Countryside and Environment	What about Climate Change and Extinctions?		Y	These matters are covered in far greater detail by the Waverley Local Plan and National Planning Guidance. We have tried to only include policies in this Neighbourhood Plan where we can add something specifically individual to our Parish.
141.	27	7	Countryside and Environment	Kyoto 2050 - outside the 2032 limit but many of the actions required nationally will need to be in place by 2032 in order to fulfil our, already signed-up to, commitment. Should the NP give support to green energy/ solar and ground source heat pumps for new builds, carbon neutral or negative (Level 6 so beloved by Gordon Brown but then Agreed by the conservatives)?	Y		These matters are covered in far greater detail by the Waverley Local Plan and National Planning Guidance. We have tried to only include policies in this Neighbourhood Plan where we can add something specifically individual to our Parish.
142.	27	7	Countryside and Environment	There is nothing here about preserving space for wildlife, habitats, wildlife corridors, existing woodland, ponds, the stream, meadows. Nor about access to those spaces.	Y		SEE COLUMN M
142	27	7	Countryside and Environment	There is nothing here about preserving space for wildlife, habitats, wildlife corridors, existing woodland, ponds, the stream, meadows. Nor about access to those spaces. There is nothing here about making sure housing is zero carbon, designed with insulation and passive heating and cooling, that electricity should be generated on site, or within the development, or should be paid for by developers elsewhere. This NPlan is not compatible with a Climate Emergency. None of the policies make any significant impact on CC, either for or against. (see Sustainability Appraisal Assessment - incorporating Strategic Environment)	Y		These matters are covered in far greater detail by the Waverley Local Plan and National Planning Guidance. We have tried to only include policies in this Neighbourhood Plan where we can add something specifically individual to our Parish.

143.	27	7	Countryside and Environment	No mention of the huge amount of effort put into the NP sub-group document on the topics of "Open Spaces, Green Spaces, Environment, Countryside". The document has over 15 written pages for introduction, policies, ecological records, and another 15 pages of maps and keys. Was it a complete waste of 2.5 years of work? Have you lost it? Do you need another copy? Please put some or all of the sub-group policies in the NP document.	Y	SEE COLUMN M
144.	27	7.1	Rural Look and feel	<p>General comments</p> <ul style="list-style-type: none"> • Suggest expand this section. There's no real sense from reading this section, nor from the rest of section 7, of what are the defining characteristics that make Ewhurst special. The importance of the countryside is not just about the wider countryside in the parish - with reference to AONB and AGLV. It's not only those designations that are relevant to 'rural look and feel'. 'Countryside beyond the green belt' is equally appropriate to all areas outside the settlement boundary, and there are significant non-designated countryside areas in the immediate surrounds of the two main settlements of the parish and within the heart of Ewhurst village. For example, nothing is said in this section about the significance of the stretches of countryside that run north to south along the western length of the Ewhurst Conservation Area characterised by the lack of 20th century development. Aerial views on pages 46 and 47 of the draft NP demonstrate this feature. • This is a point that the site assessments also failed to recognise - with descriptions such as 'urban boundaries' and 'urban/semi-urban feel' for sites on the west side of The Street. From our end of the telescope, these fields contribute to the rural character of the village, rather than being seen as urbanised simply because they immediately about the settlement boundary. • This section is also too brief and thin on the habitats and biodiversity that contribute to the settlements' rural character and feel. We are fortunate that these habitats and biodiversity are in the heart of the village - e.g. on the fields behind the west side of The Street. This whole section underplays the role of the countryside within the heart of the village - an imbalance that needs to be rectified, as it is relevant also to housing development policies. 	Y	SEE COLUMN M

145.	27	7.1	Rural Look and feel	<p>Comment: The Neighbourhood Plan does not mention what the 'rural feel' consists of. It has plenty to say about biodiversity, landscape and wildlife but nothing about agriculture, land use and the rural economy.</p> <p>After Para. 3 add: The rural feel of the village is reflected in the layout of the roads with frequent grass verges, building lines set back from the road, front gardens with low walls or hedges, a minimum of street furniture and the sight of large trees in the background. This character should be maintained.</p> <p>In Para. 4 after 'WW9' add: The land, which south of the hills consists of heavy clay, supports arable, dairy and sheep farming as well as the keeping of horses for recreational use. Such uses should be retained but made sustainable in the face of climate change and, possibly, the need to grow more food.</p> <p>Even though only 18.5% of the parish counts technically as woodland, the prevalence of large trees in gardens, in hedgerows and along roadsides gives an overall wooded impression. These trees are, however, threatened by new diseases such as ash dieback and in the longer term by climate change.</p> <p>There should then be a new policy at the end of 7.1 incorporating the last sentence: Policy justification</p> <p>Policy EEG xx is introduced in order to retain and reinforce the predominantly wooded character of the parish, particularly with the likelihood that some of our trees will die from disease or the increase in temperature due to climate change.</p> <p>Policy EEG xx.</p> <p>a. The integration of any future development within the landscape, retaining hedgerows and trees of merit, is seen as essential, thereby</p>	SEE COLUMN M
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146.	27	7	Countryside and Environment	<p>No Local Open Space policy or designation.</p> <p>The identification and designation of Local Open Space is one of the specific tasks recommended for neighbourhood plans (rather than Local Plans) as the government considers that local communities responsible for preparing neighbourhood plans are best placed to know which areas of open land are valued and used as a public amenity, notwithstanding some may not be publicly owned. Moreover Local Open Space does not have to be within the built-up area, it can be outside it in an area which is accessible to the public. Additionally Local Open Space does not have to be completely open, it can be areas which have some tree cover. The word “open” is usually interpreted as mainly meaning open to public access and use. Therefore identifying an area as Local Open Space could be another way of protecting valued areas in the countryside from unwanted development pressures.</p> <p>Has the neighbourhood plan attempted to identify any areas which may warrant designation as local open space? Why is there no Local Open Space policy in the draft plan? Does the absence of a Local Open Space policy mean that there are no areas which could warrant consideration?</p> <p>There is in fact one area, the triangle of land east of Larkfield within the permitted Firethorn Farm development site which could immediately benefit from designation as LOS. What about the playground area off Downshurst Road? Has the neighbourhood plan team properly reviewed all potential areas?</p> <p>An additional reason for identifying a few areas as Local Open Space is that they could be one of the locations for tree planting “programme” suggested elsewhere in the draft plan.</p>	Y	SEE COLUMN M
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147.	24	6	Community Facilities, Assets and Service Policies	The Hurtwood Park Polo Ground, albeit a privately owned public space, constitutes a resource which from time is used to the benefit of the communities of Ewhurst and Ellens Green. Examples were the Big Day Out and Ewhurst Rocks events held earlier this year. The significance of this site in the social life of Ewhurst is such that, contrary (for example) to the recreation ground, it is surprising that no mention is made of it anywhere in the village Neighbourhood Plan. Possibly this derives from the fact that the site is in private ownership. This said, the way that it is used is of undoubted significance to the wellbeing of the village. The above events are a good example of this. However, rock concerts of the nature of the Secret Widget Fest (SWF) planned for 2019 also present challenges to the village which are of a different scale and which cannot be ignored. As compared with the one day event represented by the Big Day Out and similar entertainments, the SWF aims to attract around 1000 attendees resident over three days in tented accommodation, with music to be provided by 36 bands on three stages from around mid-day to 11.00 p.m. on each day. This will be around double the size of the similar event of 2018, no doubt with ambitions for further growth in years to come. It is understood that this event is to be licensed by Waverley Borough Council's Environmental Services Division, which will monitor the organisation of this event including related issues such as security. It is clearly to be hoped that this entertainment can be provided with no adverse effects on the life of the village. Nevertheless, there is potential for this three day event to grow and for its effects to become more noticeable. Accordingly, it is recommended that the Parish Council makes provision for liaison with the Borough Council to ensure its monitoring of the event keeps pace with any significant growth year	Y	SEE COLUMN M
148.	24	6	Community Facilities, Assets and Service Policies	Cycling - besides recreational cyclists there has been a huge increase in organised events. They seem to be most weekends and sometimes more than one in the same day; one weekend there was a huge event on Saturday and another on Sunday. Why do they always come through Ewhurst? Do they have to apply for permission? I posed this question to Val Henry several months ago. She did acknowledge my query but I am still waiting for an answer	Y	The use of the Parish for cycling events is outside of the scope of the Neighbourhood Plan - they do not require planning permission. Further information on the permits required is available from Surrey County Council https://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/public-events/road-closures
149.	24	6	Community Facilities, Assets and Service Policies	Churches and associated buildings are not mentioned as community assets which need protecting. Buildings owned by various village clubs are not mentioned as community assets which need protecting.	Y	These references have been added to the plan.

150.	24	6	Community Facilities, Assets and Service Policies	Public buildings - Should we perhaps include the Glebe Centre site in the HLAA? In my opinion we have far too many public buildings or buildings potentially available for public use locally and nationally. Look at how many hours each building in Ewhurst gets used. Village Halls (I include Walliswood & Oakwood Hill) being nearer to me, The Rec, Churches, Church rooms, School rooms Ewhurst Infant, Sayers Croft, DoK school, Hurtwood House, Pubs - Bulls Head, Scarlett Arms, Punchbowl, Parrot, Clubs -Village, Polo, Cricket. Sports & theatre facilities - Duke of School Kent, Hurtwood House (Charitable status means they actively encourage wider access). I realise some are out of the parish boundary but if they are nearer to residents of the parish perhaps they should be included too?	Y	The comments are noted, but the plan is no longer allocating land for housing. Should a change of use be considered, it would be assessed against the policies relating to community buildings.
151.	24	6	EEG C1	In principle this policy is laudable, although there are issues to be addressed. <ul style="list-style-type: none"> - The policy wording is clumsy, unclear and capable of misinterpretation e.g. what does infrastructure improvements mean with respect to community facilities? - What is "The Parish Community, Facilities and Assets 2016"? It is a survey report, so why not call it that? Better still why not list the most important facilities in the justification of this policy and say "and others as identified in the Parish Community, Facilities and Assets Survey Report 2016?" - The justification for this policy is all but missing. - Why is a distinction being made between "supported" in the first sentence and "particularly supported" in the second sentence? Guidance for policy writing recommends not using terms like particularly, especially or exceptionally for these terms can be disputed. 	Y	SEE COLUMN M

152.	24	6	EEG C1	<p>Policy EEG C1 – Something missing because Policy EEG C3 should be deleted.</p> <p>Policy EEG C1 concentrates upon “Proposals which assist in the delivery of new or extended ...” Does this mean improved or just physically extended facilities? Many in the local community are more concerned about maintaining the availability of and access to existing community facilities and assets. It is suspected that this is the objective of Policy EEG C3 although nothing in the preamble to that policy says that.</p> <p>The LPA may have difficulty to enforce the following as a planning policy as some facilities are privately owned and operated, but there is no reason why the Parish Council should not state that it wishes to maintain the remaining community facilities and assets in the Parish. The Parish Council wishes that all existing and much valued community facilities and assets as listed in the Parish, Community Facilities and Assets Survey Report should be protected and maintained for community use unless:</p> <ul style="list-style-type: none"> - It can be demonstrated that insufficient community use remains to make facility or asset needed and viable; or - It can be guaranteed that an equivalent or better community facility or asset will be provided in a location equally accessible to the community. <p>The reasoned justification for this policy should refer to the Survey Report and could include (i) the Parish has an aging population yet there are still an appreciable number of children of all ages both of which need accessible local facilities, (ii) many available alternative facilities are several miles away and local bus services to them are often inadequate and (iii) locally available community used facilities</p>	Y	SEE COLUMN M
153.	25	6	EEG C2	<p>Although the intention of the policy is laudable there is really no need for it unless the plan has some specific proposals in mind. As it stands it is simply a statement of the Parish Councils wishes and not a planning policy which the LPA can implement. Moreover having no adverse impact on amenity etc. and compliance with other plan policies is taken as a given for all development and changes whether they are recreational facilities, community facilities or any other type of development and use.</p>	Y	SEE COLUMN M

154.	25	6	EEG C3	This policy is should be deleted. It is nonsense and not deliverable using planning powers. The intention is laudable but as it is written it is confusing and unnecessarily for it tries to do too many things like protecting heritage assets and local amenities both of which are a "given" in planning terms. These are already covered by government, local and even neighbourhood plan policy. As it stands there is no locally specific reason or element to the policy.	Y	This policy has been deleted as it does not expand on the matters already covered in the Waverley Local Plan.
155.	24/25	6	EEG C1 and EEG C3	The list in Section 13 of "projects" to which financial contributions will be sought includes the "Upgrade and extension to the village hall". The village hall is a vital community and recreational facility much loved, well supported and heavily used by residents of Ewhurst and the area around the Parish. It cannot be denied that the village hall may warrant up-grading in some respects and that more capacity for greater and wider use would not be unwelcomed. It is however an old building on a highly constrained site with only a few dedicated parking spaces and inadequate servicing facilities. If the Parish Council wants to achieve the upgrading and in particular the extension of the village hall and to secure financial contributions to such a project (as said in Section 13), the Parish Council must say this in Section 6 in the form of a policy, even if it is only a non-planning policy. Unless it does this it cannot justify seeking financial contributions from development for these project.	Y	SEE COLUMN M

156.	27	7	Countryside and Environment Policies	<p>Section 7: Absent Policies and Proposals. An opportunity missed.</p> <p>Section 7 has a number of good arguments why the countryside in the plan area needs to be protected and enhanced. Likewise it says why the plan area's local environment is valued and should be protected and enhanced. However apart from Policy EEG E1 there are no policies or proposals for doing any of these things. The neighbourhood plan has missed an opportunity to make a positive contribution to protecting and enhancing the local environment in both the countryside and in the built-up areas. It is, after all, Government policy that everyone including "planning" should contribute to the creation of sustainable living environments.</p> <p>- Why has the NP not considered identifying any areas of "Local Open Space", this is one of the locally specific designations advocated for neighbourhood plans? Is the neighbourhood plan saying there are no local open spaces in both the settlement and the countryside which merit designation?</p> <p>- Why does the neighbourhood plan not contain any proposals for local habitat protection and improvement? Is it saying there is nothing to be done?</p> <p>- Section 13 speaks of "projects" for tree and woodland planting. This is a worthy subject for a local project. However why is there nowhere in the neighbourhood plan a policy which promotes local tree planting and woodland creation? It could even identify where more tree planting would be of particular benefit to the local environment.</p> <p>- There could also be a policy which says something to this effect: All new developments which result in the loss of trees or tree cover on or off site, e.g. by creating a new access to the site, will be required to plant two new trees for everyone lost. If the required replacement</p>	Y	SEE COLUMN M
157.	27	7	Countryside and Environment	<p>The stream that runs parallel to the North of Furzen Lane contains a 'dog leg' where it passes under the Cranleigh Road. This creates a constriction for floating debris during periods of flooding and blocks the stream at this point, creating a backup of flood water that has entered upstream properties in the past. The alignment of the stream at the point where it passes under the road needs to be straightened on both sides of the Cranleigh Road before the 2019>20 winter storms.</p>	Y	This is noted but is a matter outside of the scope of the Neighbourhood Plan.

158.	27	7	Countryside and Environment	<p>I would like to comment on STREET LIGHTING, as it applies to Ewhurst. The Commission For Dark Skies has stated that "The starry sky is, unofficially but indubitably, a site of special scientific interest and an area of outstanding natural beauty: if it can be seen." (CfDS Website 2015-17)We are fortunate that, in parts of Ewhurst at least, the night sky can be seen, in all its glory. This is because in these parts the sky is dark at night and there are virtually no street lights. I am concerned that lighting used in any future development is in danger of robbing us of this extraordinary public amenity. The Campaign for the Protection of Rural England (CPRE) states that "Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban." (CPRE: Shedding Light - A survey of local authority approaches in England, April 2014)CPRE recommends, amongst other things that:- Local authorities should consider preparing a Street Lighting Policy, which could include Environmental Lighting Zones to ensure that the appropriate lighting levels are used in each zone, with very strict requirements applying in identified dark areas;- Local authorities should have a strong presumption against new lighting in existing dark areas, unless essential as part of a new development or for public safety reasons that have been clearly demonstrated; Government guidance (ref: Department for Communities and Local Government; Planning Practice Guidance, 6th March 2014) states that "artificial lighting can be a source of annoyance to people, harmful to wildlife, undermine the enjoyment of the countryside, and detract from the enjoyment of the night sky. "The Guidance suggests that lighting must be carefully considered where "A new development proposal, or a major change to an existing one, could materially alter light levels</p>	Y	SEE COLUMN M
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159.	28	7	EEG E1 Coalescence	<p>In principle this policy is acceptable. However there are a number of issues to be addressed.- It should say “all development and changes of use” because as it stands some parties could argue that they are not encompassed by the policy.- Why is ancillary to use of the land for a public recreational purpose an exception? Not all recreational uses which are appropriately located in the countryside are public.- What about other forms of development which are appropriately located in the countryside? For instance some forms of agricultural development require specific planning consent. What about some development associated with mineral extraction?- Many forms of statutory utility infrastructure works do not require specific planning consent so are automatically an exception. Do you mean major public works which require specific consent like a local power generation station?- Finally it is suggested that the area of this “local gap in development” to which the policy applies should be shown on a Proposals Map. The preceding text provides adequate justification for a policy, but as it stands the LPA will have difficulties implementing it. Probably best to simply say something like “unless it is necessary ancillary development and change for uses which are acceptable and justified in the countryside outside the built-up areas....”.</p>	Y	SEE COLUMN M
160.	28	7	EEG E1 Coalescence	<p>As stated previously in our informal comments, we would consider that further evidence is necessary to provide evidence/justification for the need for an anti- coalescence policy for this Policy to be successful at Examination. For example you need to consider:- What evidence is there to suggest there is the threat coalescence? What would be the harm in coalescence? Have there been applications for development in this area? Why this specific area should be shown the ‘Local Gap’, i.e. why these specific fields, why not one field up/down. What work has been Agreed to justify this specific area? What about other countryside uses being acceptable, not just the two mentioned? We would also advise the addition of a key to Figure 6.Given our comments on the proposed Local Gap we would welcome further discussion.</p>	Y	SEE COLUMN M

161.	28	7	Coalescence	I strongly support initiative to address the coalescence risk, but it needs to be taken further. "Although the land lies....still be appropriate" – which land? Imprecise, this is a new paragraph.- If (which you are) referring to Cranleigh/Ewhurst coalescence then in whose opinion should "some development be appropriate"? (see reference to 2015 village survey and 2017 parish feedback on site criteria – only one comment was not in support of coalescence statement). "Neighbouring towns and villages" – looks like a cut and paste. Nearest town is 10 miles/ a 20 minute drive away and so this is not specific to this plan. I strongly disagree with the current proposed gap – it should be extended to include land to the south and west of the settlement boundary at the western entrance to the village. Inspectors comments on recent planning applications have heightened the importance of this land with regards to the rural setting of the village. In the independent/impartial site review conducted by SB the land ref no.6 was identified as not suitable. Given the importance of maintaining and protecting this entrance to the village and acknowledging that coalescence can be from both Cranleigh development and Ewhurst development there is no logic in excluding the land to the south and west of the settlement boundary at the western entrance to the village from the local gap designation.	Y	SEE COLUMN M
162.	28	7	Coalescence	"Although the land lies outside the Settlement Boundary" Editing mistake - what does "the" refer to here? I would suggest cutting the first sentence and beginning the paragraph with "Neighbouring towns and villages require protection from new development ..."	Y	SEE COLUMN M
163.	28	7	Coalescence	The Cranleigh/Ewhurst gap: the parish council should contact Cranleigh village council to agree the joint approach to separate identities	Y	SEE COLUMN M
164.	29	7	EEG E1 Coalescence	As the Policy Justification 'seeks to enhance the distinctive Characteristic of the Western entrance to the village' I would have thought that the land south of Cranleigh Road and west of Gadbridge Lane should have been included in the Ewhurst Local Gap designated area shown in Figure 6. This would better reflect the settlement boundary and is recognised by planning inspectors Shrimplin Brown as being visible from Cranleigh Road and as being a 'sensitive location at an entrance point into the village'. If included in this Gap area it could only be developed under the proposed conditions detailed in E1. This seems to me to be in line with the advice given by the external Consultants Shrimplin Brown.	Y	SEE COLUMN M

165.	29	7	EEG E1 Coalescence	" loss of separate identity between the settlements" - does this mean "between the settlements of Ewhurst and Cranleigh"? This needs to be made explicit if so. What about between the settlements of Cox Green/Ellen's Green and Rudgwick? This is also an area covered by the NP and has been the subject of considerable concern. This should be made clear in this policy/section also.	Y	SEE COLUMN M
166.	29	7	Policy EEG E2: Green Space and Landscaping	"green space and landscaping" box – so not a NP policy?	Y	The Green Space and Landscaping is a policy, reference EEG E2.
167.	29	7	Policy EEG E2: Green Space and Landscaping	We suggest that this Policy could be reworded, as currently it does not read as a policy. For example: "Proposals for major development should be accompanied, where relevant, by appropriate evidence to address the following:..."	Y	Agreed.
167.	29	7	Policy EEG E2: Green Space and Landscaping	We would highlight is that whilst a valuable tool and requirement for most WBC defined "major" development applications, an Landscape and Visual Assessment may not be necessary for all major applications hence the non-mandatory scoping approach to such matters and the fact that our local validation requirements do not currently make distinction at this level. Although we would support the rationale, we are unsure as to whether its incorporation into NP policy could reasonably make it non-negotiable. The wording could be adapted to refer to (non-EIA) "Landscape and Visual Impact Appraisal" to overcome the potential conflict.	Y	Agreed - the term 'Assessment' has been replaced with 'Appraisal'
167.	29	7	Policy EEG E2: Green Space and Landscaping	In regards to Part d. we would suggesting adding the wording "Where applicable,..."	Y	Agreed
168.	29	7	Green Space and Landscaping	Footnote 21. Correct Policy reference to: RE3.	Y	Agreed
169.	29	7	EEG E2	Comment. It needs its own section heading as for some reason this policy is in the coalescence section.	Y	Noted and text amended
169.	29	8	EEG E3	Comment - Is this policy as drafted specific to Ewhurst? Or is it a Waverley policy? If so, Why has this Waverley policy been singled out for special attention?	Y	SEE COLUMN M
169.	29	9	EEG E4	Comment. Policy E2 is the one and only reference to green spaces in the NP and relates only to green spaces and landscaping within developments. An important omission from this section is consideration of green spaces within the parish and appropriate policies within the NP. Suggest a Green Spaces policy is considered for E & EG NP. Many NPs we have read examine green spaces within the NP area and come up with appropriate conclusions/policies.	Y	SEE COLUMN M

169.	29	10	EEG E5	Page 29 Last para. Comment. Suggest delete. This para has nothing to do with Coalescence or Policy E2, or anything else in this section. Also the last sentence singles out one specific Waverley policy for no apparent reason. Waverley LP's objective to enhance and protect the qualities of the countryside beyond the green belt amount to much more than protecting the AONB.	Y	Noted
170.	29	7	EEG E2 Green Space and Landscaping	This policy is superfluous, lacks specific plan area justification and is in the wrong section of the plan. - The policy is not about "The Countryside" and is only obliquely related to the "Environment". As the first sentence says it is about requirements to be placed upon "new residential development". It is not about all types and forms of development and change subject to planning control. It should be in a section dealing with the requirements to be placed upon housing development in the plan area. - Moreover there is no need to repeat LPA/Local Plan policy requirements in a neighbourhood plan unless there are specific local reasons for adding to or modifying those requirements. - At present there is no justification given in Section 7 for this policy even if it was the right Section.	Y	SEE COLUMN M
171.	30	7	7.2 Conservation Areas and Historic Environment	Amend third paragraph, second sentence to: "Protecting heritages assets is a key objective of the Neighbourhood Plan..." Factual Correction. Amend fourth paragraph, White Hart Cottage and Marylands are Grade II*.	Y	Agreed
173.	30	7	Conservation Areas and Historic Environment	<ul style="list-style-type: none"> • "protecting heritage....selection process" – so either make it a policy or state something like "reflected in site assessment criteria". • Paragraphs 4 and 5 – detail, should be in section 4. • If you don't have any policies then it shouldn't be in the policy section. 	Y	SEE COLUMN M

174.	30	7	7.2 Conservation Areas and Historic Environment	<p>Conservation Areas and Historic Environment – No policies</p> <p>Nothing in this section is disputed despite there being several basic errors. However it actually serves no purpose as a Policy Section for there are no policies or proposals in it - neither planning policies nor non-planning Parish Council policies. At present this section is a cobbled together repetition of Government policy and guidance, LPA policy and guidance, miscellaneous facts and the views of other agencies and parties.</p> <p>When one untangles the jumble of information in this section there are some aspects which might have been used as justification for policies and proposals in a “Heritage” Section and for assessment decisions elsewhere in the plan. However as it stands it is no more than useful background information.</p>	Y	SEE COLUMN M
175.	30	7	7.2 Conservation Areas and Historic Environment	<p>Section 7.2 Conservation Areas and Historic Environment and Elsewhere in the Draft Neighbourhood Plan – Reference to Heritage Assets. One possible designation and policy.</p> <p>This section refers to non-designated heritage assets e.g. Sayers Croft. Heritage assets are referred elsewhere in the draft plan as though they are for specific, identified and designated features. Although some heritage assets are identified in earlier sections, these are simply background information. There is no policy or designation for local heritage assets.</p> <p>Heritage assets as designation do not exist in Government and local planning policy. There may indeed be in the Parish, buildings, structures areas and features (or assets) which are such an important part of local heritage which although are not officially designated, would benefit from being given some form or level of protection from loss or change. However unless the neighbourhood plan identifies these local heritage assets in a policy section and has a policy for their “protection”, the LPA will not be able to give any weight to “heritage assets in its decisions.</p>	Y	SEE COLUMN M

176.	30	7.2	Conservation Areas and Historic Environment	<p>There are no NP policies on conservation and heritage. Is this because they are all down to Waverley? If so, say so. Suggest perhaps, there could be practical proposals for improvements to enhance the conservation areas.</p> <p>Page 30 Third para. final sentence.</p> <p>Comment We agree that ‘Protecting heritage assets is a key objective of the Neighbourhood Plan...’ But we cannot agree with the second part of that sentence which implies that this objective has weighed heavily in the plan. We cannot see any evidence of this objective being delivered. Here’s why:</p> <ul style="list-style-type: none"> • While the site assessments do indeed address heritage assets in the criteria metrics, there is no mechanism for weighting the criteria, so we cannot see how heritage assets have weighed so heavily. • Some site assessments make reference to providing appropriate buffers to accommodate heritage and conservation concerns - but the application of such buffers is inconsistent. The computation for housing capacity for sites 7 & 11 applies a buffer, but there is no such buffer for site 10. • Correspondence between Waverley and the NP team in relation to site 10 (FOI response) states “The heritage importance of the site may have been under-assessed by Shrimplin Brown”. It would be interesting to know how Waverley would have commented had they known that any development on Site 10 would have to be squeezed into a 1/2 hectare smaller site than that assumed from the site diagram (incorrectly drawn). • Despite heritage assets “weighing so heavily”, the sites to which Section 12 of this plan proposes to direct all future development are immediately adjacent to both listed buildings and the Ewhurst 	Y	SEE COLUMN M
177.	30	7.2	Conservation Areas and Historic Environment	<p>At the end of the section add: The slopes of Pitch Hill, while not a Conservation Area, have their own particular character defined by large Victorian and Edwardian houses and gardens, many in the Arts and Crafts style and some of recognised architectural merit. It is important that any infill development is sympathetic to the general character of this area.</p>	Y	SEE COLUMN M
178.	31	7	Conservation Areas and Historic Environment	<p>Tables. We are of the understanding that these two tables have been taken from Waverley Borough Council documents. These have been amended and not referenced properly. If you are using information from an adopted document then it should not differ, or it should be made clear that you have summarised the contents of a Waverley document.</p>	Y	This has been clarified

179.	31	7	Conservation Areas and Historic Environment	Table 1 – is detail so should be in section 4.		Y	The table can remain in this section as it provides important detailed information relevant to the theme of this section.
180.	31	7	Conservation Areas and Historic Environment	Conservation Areas. (Tabulations) Comment The last box for each CA appraisal template, states Waverley’s CA policy: “Future development proposals should take into account the character and special interest of the conservation areas as identified in this appraisal”. Surely the NP should have something to say how it will ensure delivery of this CA policy. Otherwise what is the point of these tabulations?	Y		SEE COLUMN M
181.	32	7	Conservation Areas and Historic Environment	Sayers Croft. It is the duty of the local planning authority (WBC) to designate conservation areas. Waverley has previously considered Sayers Croft for designation, but it was not considered suitable. This is unlikely to be reviewed within the Plan period without significant justification. Historic England do not recommend areas for designation outside of London and we have no evidence that this has been suggested by them. In addition, in 2017 the Twentieth Century Society where commissioned by Historic England to explore potential conservation area designation for 20th century structures and landscapes, Sayers Croft is not listed https://historicengland.org.uk/content/docs/planning/c20-society-conservation-areas-project-report-pdf/	Y		SEE COLUMN M
182.	32	7	Conservation Areas and Historic Environment	Paragraph starting “whilst not included...” – so make it a policy!	Y		SEE COLUMN M
183.	32	7	Conservation Areas and Historic Environment	Last para. Comment. Statements about Sayers Croft and the Ewhurst Conservation area are very muddled. Last sentence appears to be a policy. Other than a ref to the Twentieth Century society, what is the justification and what are the intended outcomes? And won’t it be a separate CA in its own right, rather than part of the Ewhurst CA?	Y		SEE COLUMN M

184.	32	7	Section 7.2 Conservation Areas and Historic Environment	Section 7.2 Conservation Areas and Historic Environment –Paragraph following Ewhurst Green Conservation Area Appraisal and Management Plan. This paragraph says “The need to include Sayers Croft as part of the Waverley Borough Council Ewhurst Conservation Area Appraisal and Management Plan is seen as critical and an integral part of the overall Neighbourhood Plan.” Sayers Croft may be a “local heritage asset”. Planning appeal inspectors may have referred to it as a heritage asset. Historic England and the Twentieth Century Society may have recommended it as a Conservation Area, However Waverley Borough Council has determined it does not warrant being a Conservation Area in its own right or part of another area. It is in fact separate from the Ewhurst Conservation Area and it is in no way critical and integral to that area. The fact remains it is not a conservation area and it is completely inappropriate to suggest that an appraisal and management plan for a separate conservation area should be applied to Sayers Croft.	Y	SEE COLUMN M
185.	32	7	Section 7.2 Conservation Areas and Historic Environment	Section 7.2 Conservation Areas and Historic Environment –Paragraph following Ewhurst Green Conservation Area Appraisal and Management Plan. There is no dispute that there are some local heritage assets which merit some form of protection from development and change both on and off site which could adversely impact upon their value as heritage assets valued by the community. Prominent amongst these local assets is the main evacuation camp area of Sayers Croft. Indeed both the LPA and Planning Inspector’s have accepted that the camp area of Sayers Croft closest to Cranleigh Road is a heritage asset which should be taken into account when taking planning decisions for nearby sites. It is suggested therefore that a redraft of the neighbourhood plan includes:- A policy which identifies the main local heritage assets worthy of some form of protection;- Shows these areas on a plan; and- States in the justification why these assets which merit their identification and what should be “protected” when taking planning decisions. It could even include as an appendix a short appraisal and management plan for the main assets like Sayers Croft. The area of Sayers Croft which could be identified is the main “built-up” area of the original evacuation camp and not the extensive open and wooded area of the grounds north of the fact already protected as designated Local Nature Reserve.	Y	SEE COLUMN M
186.	32	8	Local Economy	Surely The Old Rectory is among the largest employers?	Y	Noted

187.	32	8	Local Economy	The Bulls Head, Village Hall and Hazelbank Stores, the school and churches are vital village assets and any negative impact on any of these will have serious consequences. When one is lost, others soon follow and it is important they are kept for use by future generations.		Y	Noted
188.	33	8	EEG L1: Economy and Employment	"Proposals which support the Parish's local economy will be supported" Again this language is poorly phrased. As well as implying absolute support, the "Parish's local economy" is not well defined. This could mean that the local economy benefits if local builders or tradesmen are used, ergo any development is supported. The wording of the policy should be completely clear e.g. "A viable local economy is seen as an integral component of sustainable development and positively contributes to a healthy, viable community. Those proposals which support the Parish's local economy by allowing extensions to existing business or redevelopment of unused agricultural buildings will be given support, especially those which: ..."	Y		Agreed, the policy has been amended
189.	33	8	EEG L1: Economy and Employment	The Policy justification refers to the intention of the Policy being to support the re- use of redundant agricultural buildings. However, this is not reference within the proposed Policy. The NPPF definition of previously developed land specifically excludes reference to agricultural or forestry buildings. Therefore, it may be necessary to amend the wording of the Policy to achieve the desired intention in regards to the re-use of redundant agricultural buildings.	Y		SEE COLUMN M
189.	33	8	EEG L1: Economy and Employment	Part d) should refer to Heritage Assets not sites, as per the NPPF. Amend to state 'conserve' and not 'preserve'.	Y		Agreed
190.	33	8	Local Economy	This can't include University College London's Mullard Space Science Laboratory because that would bring the number employed inside the Parish right down.		Y	Noted
190.	33	8	Local Economy	There is no mention of the importance of the village shop.		Y	This has been added

191.	33	8	EEG L1	<p>Although in principle the intentions of this policy is not disagreed with and merits support, there are a number of issues with it which need to be addressed because the LPA will find it difficult to use and enforce in its decisions as the policy stands.- The policy justification is “thin” and not specific to the plan area. Moreover it should not have to say what “The intention of this policy” is. That should be clear from the policy. -The first sentence of the policy is superfluous. It is actually a statement of fact which justifies the policy.- Actually the policy itself (i.e. from “Proposals....”) does not say much of significance or difference to both Government and Local Plan policy. Nothing in the policy or the justification identify why this policy is required for the plan.- With respect to clause (a), what happens if a scheme uses previously developed land but is not physically well-related to existing settlements?- Likewise what happens if a location is more sustainable but not sensitive to their surroundings? And how do you judge what constitutes “more sustainable”?- What are the Heritage sites and their setting? Is this meant to encompass just “officially” designated sites, areas and properties or does it include those “unofficial” assets identified in the plan? If the latter, where are these heritage assets identified in the plan?</p>	Y	SEE COLUMN M
192.	33	8	EEG L1	<p>Sub-section b states developments should “...make a location more sustainable”. This requires greater definition if it is to be used as a policy tool as in the current form it is too vague to be used proactively. However, the policy should acknowledge neutral impacts also. Recommendation: Remove the last part of the sentence or add more text to the main body defining what elements would be considered in making this judgement to enable the policy to function better. Acknowledge that development should conserve or enhance the sustainable nature of the location.</p>	Y	SEE COLUMN M
193.	33	8	8.2 Local Businesses	<p>Policy justification – be consistent, if using this heading then it should apply to all policies.</p>	Y	Done
193.	33	8	8.2 Local Businesses	<p>Point d. – local amenity/rec’ facilities.</p>	Y	Done
194.	33	8	8.2 Local Businesses	<p>Working from home - again, I feel a much greater emphasis should be given to how work will change for our largely service orientated working population. Census showed 16% in 2011 and will have grown considerably since then.</p>	Y	This is noted. Generally there is no need for planning permission in order to work from home, unless these is considered to be a significant change in use.

195.	33	8	Economy and Employment	Does this section include the contribution and importance of the agricultural sector? If so, it is not apparent. From the OS map and personal observation, particularly in the southern part of the parish, much land is devoted to livestock and crops. It is important to emphasise that the parish is not just commuter settlements and pretty, 'rural' countryside, but that it generates agricultural revenue and jobs. We suggest that you emphasise the number of acres of agricultural land, the revenue it generates and the jobs both direct and indirect which it provides. In addition, the pictures on the frontispiece, which are mainly of buildings, could include field of crops and livestock to emphasize the agricultural contribution to the parish economy. Otherwise the message coming over from this draft plan is of a pretty Surrey parish with lots of land awaiting development, which may, in part, be true of Ewhurst Village but not of the rest of the Parish.	Y	SEE COLUMN M
196.	33	8	8.1 Retail Facilities	The plan says that keeping the Bulls Head as a village pub is important, yet the parish council has shown no sign of engaging in any constructive discussion with the freeholder of the pub. The Bulls Head is in obvious need of money being spent to upgrade it, yet the local population appears to expect it to continue in business without giving the freeholder any incentive to invest in it. One hopes that the parish has learnt from its mistake.	Y	The business plan / viability of the pub is outside of the scope of the Neighbourhood Plan.

197.	34	9	Utilities	<p>Network Overview</p> <p>SGN's network within Ewhurst-Ellens Green parish area in Waverley Borough, south Surrey, is energized by the South Local Transmission System (LTS) and supported by the integrated IPMP system. Transmission Regulator Stations (TRS) are located across the centre of the region, reducing pressure to the High Pressure (HP) Intermediate (IP) and Medium (MP) pressure systems. In some instances pressure is reduced from IP to MP by means of District Pressure Governors (DPG). In turn, the IP/MP systems are further broken down to Low Pressure (LP) systems directly supplying the majority of existing domestic customers.</p> <p>Strategic Development Areas</p> <p>Through the assessment of the impact of developments/modifications there are no areas of significant concern - which result in the requirement of network reinforcement. There is no new reinforcement required from the latest local plan/action plan or sites which may have significant impact, compared to the potential existing ones. SGN's infrastructure will not be severely affected from the developments in Ewhurst-Ellens Green as described on the neighbourhood plan document.</p> <p>Below is a short synopsis of the networks supplying these areas where reinforcement will may be required in the medium and long term. For Ewhurst-Ellens Green parish area, reinforcement of the IP/MP Grid will be required, if gas is to play a major role in meeting the energy requirements of any potential developments identified in the neighbourhood plan. If said developments are phased as set out in the</p>	Y	The comments are noted. The NP is not allocating land and therefore there is currently no further need to investigate the implication on the SGN. Existing permissions will already have been taken into account.
198.	34-38	43747	Utilities / Transport	<p>Despite there being NO policies about preserving wildlife, there are TWO about communications and FIVE on transport.</p>		These comments are noted and the section on the countryside has been strengthened.
199.	34	9	Utilities	<ul style="list-style-type: none"> Paragraphs 1 and 2 – a parish, not just a Ewhurst plan (reference also Ellen's Green). 	Y	Agree and the text has been amended to refer to the Parish rather than one community within it.
199.	34	9	Utilities	<ul style="list-style-type: none"> "Policy Justification" paragraph – what is a "central core"? Looks as though you are signing off on buildings etc. -> this would be of concern. 	Y	Text amended to say, '.....the provision of this central core infrastructure by a commercial company
200.	34	9	EEG U1 Communications Infrastructure	<p>The emerging LPP2 Policy will sufficiently cover this matter and the NP could consider removing this Policy. Alternatively the EEG NP could address the matter more specifically in relation to EEG.</p>	Y	SEE COLUMN M

201.	34	9	EEG U1	<p>- Although the intentions of this policy are laudable, it contributes nothing to the neighbourhood plan. It is a statutory requirement that all development and including any undertaken by or for all utility infrastructure providers attempts to minimise its adverse impact on the landscape etc.. Most works and infrastructure undertaken by utility infrastructure providers do not require specific planning consent. Moreover there is no plan area specific justification for the policy.</p> <p>- It could be made a neighbourhood plan policy if it referred to specific areas such as the AONB in the Parish and the two Conservation Areas. However to do this there is a need to provide plan area justification for going beyond the normal requirements placed upon all developments to minimise adverse impact. In relation to the AONB, justification could refer to the long distance visibility of most of the south facing tree covered slopes and the potential intrusion into the views of masts and the like. For the Conservation Areas it could refer to the open character of parts both areas and the high visibility of some buildings and structures which make an important contribution to the character and appearance of these areas.</p>	Y	SEE COLUMN M
202.	34	9	EEG U2: Broadband Provision by Developers	Is this policy enforceable under the current planning framework? If so, which ones? They should be detailed following the policy.	Y	SEE COLUMN M
203.	34	9	EEG U2: Broadband Provision by Developers	As previously stated, we note that this Policy goes beyond the requirement of Policy CC2 in LPP1. For this Policy to be successful at Examination further evidence/justification to support that it is reasonable to require a higher standard in the EEG NP is necessary. Additionally, it could be that this Policy may be overly onerous all domestic schemes, e.g. would it be a reasonable requirement for a residential extension. It will therefore be necessary to demonstrate the requirement is reasonable/deliverable.	Y	SEE COLUMN M

204.	34	9	EEG U2	<p>Although in principle it is supported, it is not certain that the LPA can enforce it using planning powers and there are issues with the policy.</p> <p>1. The Policy Justification (before Policy EEG U1) starts to justify Policy EEG U2. However it could be a more specific to the plan area. This will assist the LPA in implementing and enforcing it. For instance it could say something like: The NP area (E&EG Parish) has been for several years (like many partly rural areas) an area where the main installers have been slow to install adequate high speed broadband connection capacity to “remoter” properties and developments, i.e. those more than a few hundred metres from the consolidated area of Ewhurst Village. Moreover the capacity of the high speed network and connections installed by the main installers has sometimes insufficient to connect all properties and to extend the network to remote areas. Fortunately this situation is now changing as another installer is putting in a high capacity high speed network to a wider area of the Parish. However it is important that all new and existing developments whatever their size and location have the opportunity to connect to a high speed broadband network.</p> <p>2. Why does Policy EEG U2 limit itself to “residential development” when the Policy Justification speaks of the importance of ensuring “all new housing, community and commercial development is connected to superfast broadband?”</p> <p>3. The second part of the policy starting “New and upgraded broadband infrastructure...” contributes little to the policy for its main point could be applied to all forms of development and change. Moreover most works and installations by utility service providers do not require specific planning permission. It could be made better and more relevant by saying something like as follows: Although most</p>	Y	SEE COLUMN M
205.	35	9	Utilities - Water Supply	SPS – Ewhurst green?	Y	SEE COLUMN M
205.	35	9	Utilities - Water Supply	“Capacity of the existing.....this Plan” and “the following policy...Savills Ltd” – where? No policy is evident.	Y	SEE COLUMN M
206.	35	9	Utilities - Water Supply	Where is the policy?	Y	SEE COLUMN M
207.	35	9	Utilities - Water Supply	Just minor comments - can't see the water supply policy referred to at 9.2 - but that may just be me.	Y	SEE COLUMN M

208.	35	9	Utilities - Water Supply	In Item 9.2 Water Supply and Wastewater Treatment there is a lot of useful data on the sewage system but nothing on the supply of mains water. Thames Water sent an email to Waverley BC on 16/10/2018 in respect of WA/2017/2362 (Firethorne development) saying that 'The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development'. Clearly the vital requirement of adequate supply of mains water needs to be addressed in the Draft Plan. We also are subject to frequent power cuts in Ewhurst. There should therefore be a requirement in the Draft Plan that all vital services such as these can be reliably supplied to all new housing developments (and existing ones).	Y	SEE COLUMN M
209.	35	9	Wastewater Treatment	"minor exception" Remove the word "minor" - it implies that Ellen's Green residents are not as important in the consideration of this NP, which is not true.	Y	SEE COLUMN M
209.	35	9	Wastewater Treatment	", the following policy has been developed based on correspondence with Savills Ltd" THE POLICY IS MISSING HERE. The correspondence with Savills that is being referred to also needs to be included as a supporting document.	Y	SEE COLUMN M
210.	35	9	Wastewater Treatment	Not sufficient attention is being given to land drainage and small ditches and streams are being ignored leading to flooding in very wet weather.	Y	SEE COLUMN M
211.	35	9	9.2 Utilities - Water Supply	Section 9.2 of the Neighbourhood Plan, though nominally dealing with the supply of water to the village, in fact has little to say on this subject.	Y	SEE COLUMN M
211.	35	9	9.2 Utilities - Water Supply	As residents of Larkfield, it has become unacceptably common for the supply of water to fail in ways which include both the total loss of supply, to pressures which are excessively high. All the indications are that the supplier, Thames Water, is struggling to meet current demands and furthermore, from its existing infrastructure, has acknowledged its total inability to meet significantly new demands such as those represented by the recently approved Firethorn Farm development.	Y	SEE COLUMN M
211.	35	9	9.2 Utilities - Water Supply	It would appear to be wholly justified for the village to press for an improved service of water supply.	Y	SEE COLUMN M
212.	35	9	9.2 Utilities - Water Supply	We would advise you to ensure all statements regarding capacity within the supporting text have been verified by the relevant statutory bodies.	Y	The consultation responses received from the Utilities providers at Regulation 14 stage did not identify any issues with capacity. In addition the plan is no longer seeking to allocate land for housing which may or may not create further capacity issues. The NDP text has been amended to reflect this.

212.	35	9	9.2 Utilities - Water Supply	The final sentence refers to the development of and inclusion of a Policy, however this appears to be absent.	Y	SEE COLUMN M
213.	35	9	9.2 Utilities - Water Supply	Comment: Surely the failings of the wastewater system require a more robust statement of what is needed. Add to this the potential for more and more intense rainfall due to climate change. Is there a Policy missing here (see para 5)?	Y	SEE COLUMN M
214.	35	9	9.2 Utilities - Water Supply	The current infrastructure, particularly water and electricity, often present problems regarding uninterrupted supply and so it is essential that any proposed development can be supported and does not worsen the current situation.	Y	SEE COLUMN M
214.	35	9	9.2 Utilities - Water Supply	It is also important that proper access to any proposed development is included.	Y	SEE COLUMN M
215.	35	9	9.2 Utilities - Water Supply	Water Supply and Wastewater Infrastructure – A missing policy	Y	SEE COLUMN M
215.	35	9	9.2 Utilities - Water Supply	The fifth paragraph of Section 9.2 ends with “the following policy has been developed based upon on correspondence with Savilles Ltd.” However in the draft plan on the web site there is no policy to comment about! The preceding text suggests that the policy could be about:- Constraining new development in some areas because of flooding and drainage problems and limits on the capacity of the public sewer system and pumping station; and- Requiring any new development in these areas to include “works” to address the problems. In principle a policy with these aspects merits support. However it will be difficult to have such a policy in a neighbourhood plan which the LPA can implement using planning powers for it is the responsibility of the water agency to justify any constraint on development and to determine whether problems can be overcome. The LPA must have regard to the views of the water agency when determining a development proposal rather than any planning policy which seeks to constrain development. Nevertheless it is acceptable to have a non-planning policy in the neighbourhood plan if it is made clear that it is a Parish Council policy which relies upon the water agency and not the LPA to implement. Clearly the NP Team and/or the Parish Council did not read or care about what they published for community consultation. They should not rely upon a respondent to identify such an error.	Y	SEE COLUMN M

216.	35	9	Water Supply and wastewater	Last sentence. Comment. Where is policy on water supply developed in correspondence with Savills - as mentioned? It is missing from the text. Is this the policy that links back to addressing concerns of residents in last sentence of para 4 on this page?	Y	SEE COLUMN M
217.	36 - 38	10	Traffic and Transport	We have reviewed the Ewhurst and Ellens Green NP consultation and have no comments.	Y	Noted
218.	36	10	Traffic and Transport	"The local road network comprises largely unimproved rural B-class roads and unclassified country lanes; there are no main or A-class roads in the Parish. The Parish benefits from a public bus service, but there is no railway station. Railway services are located 10 -13 miles from the main Ewhurst Settlement (Dorking, Guildford, Horsham). There is an extensive Public Rights of Way network throughout the Parish." Duplication - this exact paragraph is already included in section 4.5. See comments there for additional amends.	Y	Agreed
219.	36	10	Traffic and Transport	I am particularly concerned about the volume and speed of traffic on the road through Ewhurst Green. Both have increased enormously over the past two years, and the road is used as a test track by the Cridfords. This is common land, used by walkers and horse riders, and this situation is dangerous	Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available.
220.	36	10	Traffic and Transport	Whilst traffic calming is mentioned for the B2128, the recent long term closure of the western access to Ewhurst from Cranleigh Road has created a dangerous rat run in Furzen Lane that is only likely to get worse with the developments at Broadbridge increasing commuter traffic; therefore Furzen Lane must be included in any traffic calming measures. The increasing number of small (except 1) accidents in 2019 in Furzen Lane will inevitably end up with a pedestrian fatality and vehicular calming measures need to be taken before this happens!	Y	The introduction of traffic calming measures is not something that normally requires planning permissions and therefore is outside the main scope of the Neighbourhood Plan. However a new section has been included in the plan which sets out the proprieties of the Parish when we are considering how S106 and CIL money should be spent. It will provide guidance to not only the Parish, but also the District and County. Traffic calming is included within this list.
220.	36	10	Traffic and Transport	There is no roadside barrier to the North side of Furzen Lane where a stream flows under just to the West of the 40 mph signs and, as this is at a constriction in the road, a vehicle could easily drop a wheel into the stream, especially when two tipper trucks pass each other (the roadside vegetation has already been damaged at least 4 locations by vehicles passing too close).	Y	This is a highway safety matter that should be reported to Surrey County Council. It is not a matter for the Neighbourhood Plan.
221.	36	10	Traffic and Transport	Paragraph 1 – repetitive of section 4.	Y	Agreed
221.	36	10	Traffic and Transport	“the quantity and frequency of through traffic” – not an area or speed issue.	Y	SEE COLUMN M

221.	36	10	Traffic and Transport	Last bullet point of the page – policy, not an issue.	Y	The text has been amended to read as an issue rather than a policy
222.	36	10	Traffic and Transport	Comment: Much of the traffic through Ellens Green is not just along the B2128 but also Furzen Lane, which is a convenient route from Cranleigh to Horsham avoiding Rudgwick (I use it myself).	Y	Noted
222.	36	10	Traffic and Transport	In the three places where the B2128 is mentioned add: and Furzen Lane	Y	Agreed
223.	36	10	Traffic and Transport	Highway Safety, I would like to express my concern that Surrey County Council have allowed access to the new Firethorn development between the junction of The Green and Cranleigh Road, and the entrance to Larkfield. Today there was a serious accident at the junction between two cars, the one travelling down The Green, obviously not realising it had to stop at the junction. When cars from 49 dwellings are turning out onto The Green, how many more accidents can we expect. Surrey County Council should be made aware of all this type of concern of Ewhurst Residents.	Y	Surrey County Council are responsible for ensuring that access to and from a development meets their specifications. Serious accidents will be monitored by them. Decisions made as part of a planning application that has already been permitted cannot be revoked through the neighbourhood Plan.
224.	36	10	Traffic and Transport	Traffic calming measures please	Y	Traffic calming measures will be included within the infrastructure projects listed as a priority of the community.
225.	36	10	Traffic and Transport	I am concerned by the speed of traffic on the Horsham Road through Ewhurst Green. I think that the speed limit should be reduced to 30mph. The installation of some traffic calming measures would improve adherence to the speed limit.	Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Traffic calming measures will be included within the infrastructure projects listed as a priority of the community.
226.	36	10	Traffic and Transport	<u>Road Safety</u> . There is an urgent need for 30 mph max speed limit on entering Ewhurst from the south on the Horsham road. The bend to the South of the village is lethal.	Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Traffic calming measures will be included within the infrastructure projects listed as a priority of the community.
226.	36	10	Traffic and Transport	1. The Church/Diocese should be approached to request an extension to the car park on the Street by at least 12 parking spaces (the area had been discussed as a possible location for a new village hall some years ago). Sensitive shrubs and herbage would mask the area.	Y	SEE COLUMN M

226.	36	10	Traffic and Transport	2. There should be no parking on The Street fronting Maskalls cottages. It would enable exit and clear view from Boomers Lane. Perhaps allocate rental spaces if the car park is extended.	Y	Existing parking issues are not a matter the Neighbourhood Plan can address, it can only try to ensure that any schemes permitted in the future provide sufficient space / do not make existing issues worse.
226.	36	10	Traffic and Transport	3. Parking in front of the shop and just beyond should be restricted to four spaces with a limited time of 20 minutes.	Y	Parking restrictions and controls are not related to planning and are therefore outside of the scope of the Neighbourhood Plan. If this is County Highways land then more information on restrictions and controls can be found here- https://www.surreycc.gov.uk/roads-and-transport/parking/restrictions-and-controls
226.	36	10	Traffic and Transport	4. The 30 mile an hour limit, highlighted at point 1, would only be feasible if the Highways Body were to impose speed restrictions by chicanes/road narrowing/or other methods.	Y	Noted
226.	36	10	Traffic and Transport	5. Reopen the layby at the village school or increase the road width thereby allowing an island crossing to be constructed. To enhance pedestrian safety Pedestrian crossing points should be made at the school and the village hall.	Y	This scheme, if it has the support of residents will be added to the list of infrastructure projects that could be delivered by use of S106 or CIL.
226.	36	10	Traffic and Transport	6. Double yellow lines should be set at the end of the Glebe junction to the Mount and Mapledrakes road, opposite the shop. These are two very dangerous places where people park.	Y	This is the responsibility of Surrey County Council as the Highways Authority and outside of the scope of the Neighbourhood Plan.
226.	36	10	Traffic and Transport	7. Remove unnecessary road signs/or use one post where possible. For example; Plough Lane where there are separate signs for frogs, horses and speed restrictions.	Y	This is a project the Parish would support, but is outside of the scope of the Neighbourhood Plan.
226.	36	10	Traffic and Transport	8. An enormous amount of money has been spent on the footpath/cycleway to Cranleigh. However there is no signage in advance to signal the cycleway. By the time you have cycled down the hill out of Ewhurst you have passed the entrance to the cycleway.	Y	This is an infrastructure project that will be added to the list of schemes that could be delivered through the use of S106 or CIL funds. In addition the Parish Council will liaise with Surrey County Council Rights of Way Team to see if signage can be improved.
227.	36	10	10.1 Traffic and Transport	The fifth bullet point on page 36 states, "It is not appropriate or practicable to attempt to add significant new lengths of pavement along...any of the roads in the Parish as most carriageways are too narrow and abut private property." This is an unsupported generalisation in the NP. However, if the work has been carried out to support the statement it should be referred to. Recommendation: Remove the section from the NP, or Provide a reference to the evidence in support of the comment.	Y	SEE COLUMN M

228.	36	10	10.1 Traffic and Transport	A further area of particular concern is the entrance to Mapledrakes road from the Street. Shop users regularly park on pavement and or block access to the road. Making it hazardous to exit and enter the road. Furthermore parking on the pavement causes wheel chair users and buggy pushers to have to go in to the road.	Y	Parking enforcement is a civil matter outside of the scope of the Neighbourhood Plan.
228.	36	10	10.1 Traffic and Transport	Additionally since the garage has erected bollards when they are closed, customers park their car on the verge outside of the garage in maple drakes road again causing a danger to pedestrians.	Y	Parking enforcement is a civil matter outside of the scope of the Neighbourhood Plan.
228.	36	10	10.1 Traffic and Transport	A further hot spot of traffic and concern will be the Bulls head roundabout when the houses are occupied as they will pull out on to the street to oncoming traffic from the roundabout	Y	The issues of access and traffic was considered by Waverley Borough Council when it determined the planning application. As this decision has already been made, this matter is therefore outside of the scope of the Neighbourhood Plan.
229.	36	10	Parking	Parking in the Street by the Ewhurst Shop: With continuing residential growth and expansion of the shop itself a difficult situation can only get worse. If some space should become available, another car park is badly needed in this lower village area.	Y	This has been noted. To date no proposals have been put forward by landowners to provide additional space, but the Parish Council would welcome discussions with any interested parties should opportunities arise
230.	36	10	Parking	"Parking hotspots" What about the Glebe? This is also affected by school pickup and drop off, more so as it is essentially a single lane road.	Y	This has been added
231.	36	10	Traffic and Transport	Any new building work will require access to roads. The Street is already dangerously busy from the Bulls Head to The Green and particularly from The Glebe to Hazelbank Stores where there are bends, blind corners, children and adults frequently crossing and breathing in polluted air from transport fumes.	Y	Noted
231.	36	10	Traffic and Transport	The pavement from the Glebe to the car park should be levelled as in some areas it slopes towards the road, dangerous for disabled people and pushchairs especially as it is so narrow.	Y	This is not a matter for the Neighbourhood Plan as it does not require planning permission. However the Parish Council will liaise with Surrey County Council to investigate what options are available to improve the pavement.
231.	36	10	Traffic and Transport	More emphasis should be given in the plan to the importance of policing and maintenance of footpaths otherwise they will be lost. We would maintain and spend significant money on roads and cycle paths, why not footpaths. They are used by many villagers but inadequate signage and attention means they will gradually be lost especially when older more knowledgeable residents no longer walk the paths.	Y	This is not a matter for the Neighbourhood Plan as it does not relate to planning.

232.	36	10	Traffic and Transport	The traffic speeds along the roads, particularly along Horsham Road through Ewhurst Green, need reducing, perhaps with traffic calming measures.	Y		The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Traffic calming measures will be included within the infrastructure projects listed as a priority of the community.
232.	36	10	Traffic and Transport	The passage of HGVs and large commercial vehicles passing through the village should be discouraged because of the congestion and degradations to the roads caused.	Y		The issue of HGVs travelling through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available.
232.	36	10	Traffic and Transport	Providing additional off-road car parking for existing conditions as well as new developments is necessary.	Y		This has been noted. To date no proposals have been put forward by landowners to provide additional space, but the Parish Council would welcome discussions with any interested parties should opportunities arise
232.	36	10	Traffic and Transport	Any further development must include sufficient increase in infrastructure and consideration for road traffic changes.	Y		Agreed
233.	36	10	Traffic and Transport	Traffic and Transport Policies. The amount of traffic on the roads in and around Ewhurst has increased vastly in recent years and yet the roads have not been improved and they are very poorly maintained. This point should be included in the Draft Plan if possible.		Y	The maintenance of roads is a matter for Surrey County Council. It is therefore outside of the scope of the Neighbourhood Plan.
234.	36	10	Traffic and Transport	Any new building work will require access to roads. The Street is already dangerously busy from the Bulls Head to The Green and particularly from The Glebe to Hazelbank Stores where there are bends, blind corners, children and adults frequently crossing and breathing in polluted air from transport fumes.	Y		Noted
234.	36	10	Traffic and Transport	The pavement from the Glebe to the car park should be levelled as in some areas it slopes towards the road, dangerous for disabled people and pushchairs especially as it is so narrow.	Y		This is not a matter for the Neighbourhood Plan as it does not require planning permission. However the Parish Council will liaise with Surrey County Council to investigate what options are available to improve the pavement.
234.	36	10	Traffic and Transport	More emphasis should be given in the plan to the importance of policing and maintenance of footpaths otherwise they will be lost. We would maintain and spend significant money on roads and cycle paths, why not footpaths. They are used by many villagers but inadequate signage and attention means they will gradually be lost especially when older more knowledgeable residents no longer walk the paths.	Y		This is not a matter for the Neighbourhood Plan as it does not relate to planning.

235.	36	10	Traffic and Transport	General comment. Surprised there is no reference to Surrey County Council Highways in the formulation of NP policies in this section, and whether and how these policies link with SCC highway policies. Also no reference to how the NP policies relate to Waverley's equivalents.	Y		SEE COLUMN M
236.	36	10	Traffic and Transport	First para, 2nd sentence. Comment. Suggest add 'limited' (public bus service).		Y	Agree
237.	36	10	Traffic and Transport	Traffic Speeds final bullet point. Comment: a small point but it would be clearer if refer to 'on our eastern side of the borough' (rather than to the East of the borough).		Y	Agree
238.	36	10	Traffic and Transport	Our concern is with the speed of traffic along The Street, particularly heading South. We live on the bend of Cranleigh Road and The Street, opposite the turning in to The Green. Cars regularly flash past us at 50/60/70mph and go straight in to The Green. We were advised that one was clocked at 90mph. When cars are coming out from the new Firethorn Farm development, between The Green junction and Larkfield, it is only a matter of time until a fatal accident occurs. An idiotic access point. We need something to slow the traffic, speed cameras ideally. Whilst the work of the Community Speed watch volunteers is laudable it is too spasmodic to be effective.	Y		The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Traffic calming measures will be included within the infrastructure projects listed as a priority of the community.
239.	36	10	Traffic and Transport	Traffic and transport issues list. Comment Suggest add 'congestion' (congestion is identified in Traffic and Transport evidence report). Congestion is also a significant omission in the assessments of sites 10 & 11 (although it is mentioned for Mapledrakes Road.)	Y		Noted, but not added. There are localised issues within the Parish but they can not be described as congestion.
239.	36	10	Traffic and Transport	Comment. With so much concern from residents about the quantity and speed of traffic through the village, how can section 12 proposals for accommodating even more development in the village than already in the pipeline be justified?	Y		The Neighbourhood Plan is no longer allocating land for further development. This should help to reduce the risk of further issues occurring during the plan period.
239.	36	10	Traffic and Transport	Comment. If work has been Agreed on the direction of traffic flows through Ewhurst, suggest this is info is harnessed in the identification of locations for any further development should that proposal in Section 12 be retained.	Y		The Neighbourhood Plan is no longer allocating land for further development. This should help to reduce the risk of further issues occurring during the plan period.

240.	36	10	Traffic and Transport	The plan makes no mention of road maintenance. Regardless of where responsibility for funding and organising this lies, it is pointless talking about promoting cycling when sections of road are unsafe for cyclists especially those on cycles with 16" and 20" wheels. (c.f. that between the bottom of Ewhurst Green and the entrance to Somersbury Lane). The Council should be promoting and supporting a minimum standard of maintenance, free from potholes dangerous to cyclists not just patched to be fit for 4X4s. The road markings up Shere Road, up to (and beyond) the parish boundary also need to be urgently restored. In the low cloud that often significantly reduces visibility up this section the absence of the centre line which used to be present is a significant safety hazard.	Y	Road maintenance is a matter for Surrey County Council Highways and is outside of the scope of the Neighbourhood plan, which deals with planning matters.
241.	36	10	Traffic and Transport	I have concerns about the speed of the traffic along Horsham Lane on Ewhurst Green and about the state of the infill of the gas main laid along the road in 2010, specifically where it is beginning to drop, so that heavy goods vehicles drop into the dips making our house shudder and, when it is raining, sending waterfalls of water into our garden.	Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Traffic calming measures will be included within the infrastructure projects listed as a priority of the community. Noted
242.	36	10	Traffic and Transport Quiet Lanes	In the context of further development I am very concerned about the access into the village from Shere which in places is only a single track road.	Y	
243.	36	10	Traffic and Transport Quiet Lanes	<u>Quiet Lanes</u> . This is a great idea but needs practical solutions. It should include North Beach Road and following discussions with Abinger parish council, it should also include Lyfield Lane.	Y	SEE COLUMN M
243.	36	10	Traffic and Transport Quiet Lanes	Impose 20/25 maximum speed limits.	Y	The Neighbourhood Plan has no powers to introduce speed limits. It is a matter for Surrey County Council
243.	36	10	Traffic and Transport Quiet Lanes	Impose a weight limit on the Quiet roads as the carriageways are now sinking.	Y	The Neighbourhood Plan has no powers to introduce weight limits. It is a matter for Surrey County Council
244.	36	10	Traffic and Transport	I wish to add weight to the words in Section 10.1 about the need for traffic calming measures on Horsham Road through Ewhurst Green. That road is bounded by the Green, which is used for recreation by both children and adults, and houses, many of which are mere feet from the road edge. There is a 40mph speed limit. That limit is generally exceeded by 50% of passing vehicles; many of which exceed the limit by a wide margin.	Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Traffic calming measures will be included within the infrastructure projects listed as a priority of the community.

244.	36	10	Traffic and Transport	Only police action will reduce the number of those who are exceeding the limit intentionally or don't care if they do so. However, an electronically lit "reminder" sign is an excellent way of drawing the speed limit to the attention of those who are speeding thoughtlessly.	Y	Vehicle activated signs (VAS) do not fall with in the scope of planning policies within a Neighbourhood Plan but they could be added to the list of infrastructure projects that might be funded through S106 and CIL
245.	37	10	EEG T1 Sustainable Travel Choices	<p>"proposals that encourage sustainable travel choices and implement the following measures" Grammar - change to "and implement the following measures will be supported"</p> <p>"All new housing developments of 10 net additional dwellings or more must provide safe pedestrian access linking with existing or planned footway provision, ensuring residents can walk safely to bus stops, schools and other Parish facilities." How was this arrived at? Is it enforceable under current planning policy? For example, what does safe pedestrian access mean? This doesn't take into account development outside the main village either, as no facilities are walkable from there. Also, this could encourage some fairly capricious proposals in terms of road crossings, bike lanes, pavements etc. that aren't well thought out for existing residents in the village. Also additional footpaths etc. may have an adverse impact on our grass verges and borders (the recent cycle path to Cranleigh meant oak woodland was cut down for example) - this needs to be accounted for more clearly in the policy.</p>	Y	The ability of people to walk, in safety, from their home to existing facilities and services is a good design principle. The policy wording has been amended but the aspiration remains.
246.	37	10	EEG T1 Sustainable Travel Choices	- Clause (c) should be a separate planning policy for it refers to a specific type of development and comes within planning powers.- Clauses (a) and (b) are not planning policies because they do not necessarily relate to matters which come within planning powers and in most instances rely on other agencies to implement. However they do align themselves with both Government and Local Plan policies for achieving sustainable development and change, it is acceptable to have them as a separate policy. The above issues could be addressed by making the policy into two policies, each with its own statement of justification and a few words about how and by whom they will be implemented.	Y	SEE COLUMN M
247.	37	10	EEG T1 Sustainable Travel Choices	The first sentence of the Policy appears to be missing text, possible amendment: "...proposals that encourage sustainable travel choice and implement the following measures will be supported:.."	Y	Agreed

247.	37	10	EEG T1 Sustainable Travel Choices	Part c. of the Policy seems unreasonable, it may not be possible for all development to link to existing services via footpaths, dependant on its location. Where is the justification in relation 10+ units? This feasibility/viability of this part of the Policy is likely to be challenged. It could be amended to: "Where possible, provide safe pedestrian access linking with existing or planned footways provision to existing facilities and services".	Y		The ability of people to walk, in safety, from their home to existing facilities and services is a good design principle. The policy wording has been amended but the aspiration remains.
248.	37	10	Sustainable Travel Choices	There is nothing here about reducing the reliance on polluting cars. Only for making sure there is plenty of space for them. What about insisting on decent public transport, with comfortable waiting places for buses with GPS real-time information, for example?	Y		This is noted, developer contributions or CIL could be used to improve the comfort of bus shelters. Unfortunately the Neighbourhood Plan has no powers to address polluting cars. SEE COLUMN M
249.	37	10	Traffic and Transport Quiet Lanes	I support the plan. I would like to know how the quiet road designation will be actioned and whether it can be extended to include Lyfield Lane and North Breache road.	Y		SEE COLUMN M
250.	37	10	Traffic and Transport Quiet Lanes	T2 Quiet Lanes. A number of questions arise here: Why the need for this? What Objective does it support? The Sustainability Appraisal Assessment does not conclude any positive impact from this Policy to the stated Objectives- By what means were these particular roads identified? Why in particular do Plough Lane and Lower Breache Lane need this protection from being dominated by vehicles, given their location? Other roads are more vulnerable to this risk than these.- What consultation has there been on which roads should be included?	Y		SEE COLUMN M
251.	37	10	Traffic and Transport Quiet Lanes	We feel very strongly that appropriate measures to prevent the lanes being dominated by vehicles are vigorously supported. Only recently planning permission was given for a so called livestock farm and HQ for a large tree felling business, to operate in Lyfield Lane. As a result large lorries and associated vehicles are constantly operating in Lower Breache Road and Plough Lane.		Y	Noted
252.	37	10	Traffic and Transport Quiet Lanes	Since my arrival in Ellen's Green in 2011, I have seen a huge increase in traffic along Furzen Lane and have noticed that there is little or none who adhere to 40mph. It is used as a rat run and motorists seem to ignore any pedestrians or pets using the road and would preferably knock them down rather than slow down.		Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available.
253.	37	10	Quiet Lanes	I believe that this section should include reference to Furzen Lane in Ellens Green both in relation to traffic speeds and Quiet Lanes. Furzen Lane has a 40 MPH restriction, and experiences heavy and fast traffic, particularly at rush hours. It is on the designated route for HGV's going to and leaving the Brickworks at Walliswood. I would also query whether there is any evidence to support the selection of particular streets in this section - if there is I cannot see it.		Y	SEE COLUMN M

254.	37	10	Traffic and Transport Quiet Lanes	Furzen Lane, Ellen's Green should be included in the Quiet Lane Proposal and benefit from traffic Calming measures. The draft plan includes the B2128 in Ellen's Green (which hopefully extends through Cox Green), but Furzen Lane been omitted. Furzen Lane is one of the few lanes in the parish which is designated a Surrey Cycleway route and is therefore often used for cycling events, both formal and informal. The (unenforced) speed limit of the part of Furzen Lane in the parish is already 40mph, (compared with 30mph in the village) which the majority of traffic ignores anyway, and, in addition to domestic vehicles there has been a very large increase over the last couple of years in waste vehicles from construction sites and other large lorries. These factors represent a serious safety threat which the neighbourhood plan should address.	Y	SEE COLUMN M
255.	37	10	EEG T2 Quiet Lanes	T2 Quiet Lanes Comment Where is the justification for quiet lanes for the specific lanes proposed? We can see nothing about Quiet Lanes in the Traffic and Transport evidence document, nor anything that distinguishes the particular lanes/roads proposed from other roads in the parish.	Y	SEE COLUMN M
256.	37	10	EEG T2 Quiet Lanes	The Sustainability Appraisal for the NP states in relation to this policy that, "...this policy is reliant on the support of the local highway authority and so there is some doubt over the end result. "The Quiet Lane concept is a difficult aim to enforce, particularly without the support of the Highways Authority (HA). If this is to be retained in the NP it is recommended that detailed discussions should be held with the HA to ensure that the policy can meet its stated aims. Recommendation: Only include the policy if the backing of the local highway authority has been secured.	Y	SEE COLUMN M
257.	37	10	EEG T2 Quiet Lanes	"Policy EEG T2" This would benefit from a map	Y	Agreed

258.	37	10	EEG T2 Quiet Lanes	As previously stated in our informal comments, further explanation is needed on what designation as a 'Quiet Lane' involves and on how the proposed Policy EEG T2 is justified and evidenced. The Quiet Lanes and Home Zone (England) Regulations 2006, appear to "set out the procedures that local traffic authorities must follow for designating, varying and revoking roads as Quiet Lanes or as Home Zones in England". As Quiet Lanes cannot be introduced through a Neighbourhood Plan, we would suggest you include the following, to ensure the evidence and background for the Policy is clear:- An explanation of what a Quiet Lane is- Include evidence/justification for the designation of the specific highways stated- Include evidence to demonstrate what support has been gained from Surrey County (SCC)- Include evidence to demonstrate what are SCC's timescales for designating the stated highways Given the above, if you have no Agreed so already, we would recommend that you discuss and you gain a view from SCC on this matter.	Y	SEE COLUMN M
259.	37	10	EEG T2 Quiet Lanes	Please include/provide justification for exclusion of Gadbridge Lane.- As with lanes a), b) and c), Gadbridge Lane lies outside of the settlement boundary.- It is used as a cut through from the Cranleigh road to the Horsham road.- It is narrow, winding, and undulation (limited lines of site for drivers) with no pavements and only intermittent stretches of 'walkable' verge – especially at the entrance and exit of the lane.- It is used on a daily basis by pedestrians (including school children), dog walkers, horse riders and cyclists. Similar arguments apply to Shere road.	Y	SEE COLUMN M
260.	37	10	EEG T2 Quiet Lanes	Although in principle this policy is supported, it is not a planning policy for it does not come within the scope of planning powers and relies upon another agency to implement. It is nevertheless appropriate to include in the neighbourhood plan as an expression of Parish Council policy and the local community's wishes provided it is made clear in its own reasoned justification that it relies upon implementation by another agency. The merit of the policy would be strengthened if the length of the roads in question were indicated on a plan. For instance what constitutes the B2128 within Ellen's Green and which part of Lower Breache Road is meant?	Y	SEE COLUMN M
261.	37	10	EEG T2 Quiet Lanes	Can Gadbridge Lane be considered as a "Quiet Lane"? It compresses all the relevant issue of density of horses, pedestrians, no pavement, adverse camber, obscured house exits, blind exit to The Green, hedgerows limiting width of road etc. has this been overlooked?	Y	SEE COLUMN M

262.	37	10	EEG T2 Quiet Lanes	Gadbridge Lane should be included in this section. It is on the edge of the village and used as a 'cut through' to Ewhurst Green for cars and heavy vehicles wanting to avoid the sharp right turn a few yards further on. Gadbridge Lane is narrow without pavements and as vehicles frequently exceed the 30mph speed limit it is often dangerous for pedestrians cyclists and horse riders.	Y	SEE COLUMN M
263.	37	10	EEG T3 Residential Parking Spaces	Although in principle this policy is supported, it could be interpreted as conflicting with Government guidance promoting the greater use of more sustainable forms of travel by making the choice to use a car less attractive! This problem might be addressed by indicating in a separate statement why the particular circumstances in Ewhurst Village justify this policy and its requirements for instance by making reference the often narrow roads and the limited amount of off street parking space in many areas. Additionally as it relates to only new residential dwellings and not all forms of development, it is probably better positioned in the housing sections of the neighbourhood plan.	Y	SEE COLUMN M
264.	37	10	EEG T3 Residential Parking Spaces	Comment. Would be helpful to state whether this is in conformity with Waverley, or something more. Does the policy conflict with Waverley's?		SEE COLUMN M
265.	37	10	EEG T3 Residential Parking Spaces	The requirements to provide the levels of parking set under sub-section b i.e. 3 spaces for a 3-bed house plus 1 additional space per additional bedroom is not in line with the Council's parking standards. It will lead to car dominated development which is unlikely to be in character with the surrounding housing. These does not meet the aspirations of the design policies within the NP and the wider Development Plan and therefore there is a conflict with policy. Recommendation: Amend the policy to request 3 car parking spaces as a minimum, and Remove the reference to additional bedrooms requiring further spaces.	Y	SEE COLUMN M

266.	37	10	EEG T3 Residential Parking Spaces	The Council understand the reasons for including this Policy. However this currently conflicts with Policy ST1 in LPP1, whereby WBC assesses planning applications against the Waverley Borough Council's Parking Guidelines. However, the Council also note that this Policy requires development to comply with the parking guidelines outlined in Policy EEG T3, whereas their current status in reference to the WBC standards are as guidelines. In some instances, the car parking standards required within this Policy significantly exceed the recommended guidance for residential parking stated in the Waverley Borough Council's Parking Guidelines. There is no justification of evidence to support these standards. This may be an issue raised at Examination and justification/evidence for a requirement may be required for the proposed parking standards outlined in the EEG NP.	Y	SEE COLUMN M
267.	38	10	10.1 Traffic Calming	Parking hotspots should include the first 120m or so of Mapledrakes Road closest to The Street and particularly at its junction with The Street. During the morning rush hour, it is not infrequent to find cars parked wholly on the pavement and on the junction itself.	Y	Parking enforcement is a civil matter outside of the scope of the Neighbourhood Plan.
267.	38	10	10.1 Traffic Calming	Pavements – the parking of cars on the pavement is both hazardous and inconsiderate for those with children's buggies and for those in wheelchairs. This is particularly prevalent on The Street between Cranleigh Road and Hazelbank Stores.	Y	Parking enforcement is a civil matter outside of the scope of the Neighbourhood Plan.
267.	38	10	10.1 Traffic Calming	Quiet Lanes – Shere Road/Ride Way should be included as a Quiet Lane with the addition of an HGV restriction which will need to be co-ordinated with Shere Parish Council, Guildford Borough Council (and also Cranleigh Parish Council?).	Y	SEE COLUMN M
268.	38	10	10.1 Traffic Calming	A significant proportion of the traffic heading South through Ewhurst on The Street quickly exceeds 30 mph from the junction where The Green leaves the Cranleigh Road. Cars, vans and lorries speed straight on as soon as they see an open road ahead so that, by the time they pass Larkfield, a significant number are exceeding the speed limit, often by a substantial margin. Installation of a speed camera backed up by legal enforcement would bring this behaviour to an instant halt. The Parish Council, supported by Waverley Borough Council, should press for the introduction of this simple and readily available technology.	Y	The issue of existing traffic levels and speed through the Parish is recognised by the Parish Council but is not within the scope of this Neighbourhood Plan. We will need to work with Surrey County Council to see what options might be available. Vehicle activated signs (VAS) do not fall within the scope of planning policies within a Neighbourhood Plan but they could be added to the list of infrastructure projects that might be funded through S106 and CIL
268.	38	10	10.1 Traffic Calming	Similarly, when travelling from Cranleigh into Ewhurst and arriving at this junction, one is blind to traffic from both North and South directions. For this reason drivers from the South should have a "Stop" sign rather than a "Give Way" to control their speed approaching that junction.	Y	This is a matter for Surrey County Council and is outside of the scope of the Neighbourhood Plan

269.	38	10	EEG T4 – Traffic Calming and Home Zones	Although in principle this policy is supported, there are issues to be addressed.		Y	SEE COLUMN M
269.	38	10	EEG T4 – Traffic Calming and Home Zones	- The first part of the policy is not a planning policy. It relies upon another agency and non-planning powers for implementation. It is nevertheless appropriate to have it in the neighbourhood plan as an expression of Parish Council policy and community wishes provided it is clear in its own reasoned justification that it relies upon implementation by another agency and not the LPA. The merit of the policy would be strengthened if the roads in question were indicated on a plan.	Y		SEE COLUMN M
269.	38	10	EEG T4 – Traffic Calming and Home Zones	- The second part of the policy could be a planning policy to include in the neighbourhood plan, although it is unclear, given government guidance about not being too dictatorial about the design housing developments, that the LPA could always insist on schemes creating Home Zones without specific local justification.	Y		SEE COLUMN M
269.	38	10	EEG T4 – Traffic Calming and Home Zones	Moreover as the policy applies to only residential development, it is better to include in a housing section with its own separate justification.	Y		SEE COLUMN M
270.	38	10	EEG T4 – Traffic Calming and Home Zones	It is possible that the first part of the Policy, relation to traffic control and speed, could be moved to the supporting text. We consider it is more of a statement, than a Policy which could be used to determine planning applications. Given our comments in relation to Policy EEG T2, we would recommend that you include an explanation of what the Home Zones objectives are. We also consider that you need evidence and justification as to why Homes Zones are appropriate and justified by local circumstances. We would recommend you include evidence to evidence the support and intention of SCC on this matter. Given the above, if you have no Agreed so already, we would recommend that you discuss and you gain a view from Surrey County Council on this matter.	Y		SEE COLUMN M
271.	38	10	EEG T4 – Traffic Calming and Home Zones	Comment. There should not be an unconditional statement supporting all and any traffic calming measures. Surely it depends on the nature and appropriateness of the measures for the location they are proposed? There should be an impact assessment for each scheme. Suggest amend this policy along the lines of ‘subject to an assessment of harm to the local area, the environment and private amenity’.		Y	SEE COLUMN M
271.	38	10	EEG T4 – Traffic Calming and Home Zones	Policy T4 - Comment what are Home Zone objectives? suggest clarify.	Y		SEE COLUMN M

272.	38	10	EEG T4 – Traffic Calming and Home Zones	The proposal for traffic calming on the Street is strongly supported. The restricted sighting and narrow entrances/exits particularly near the CofE church and school make speeding in this area particularly dangerous and we have narrowly avoided being hit by speeding vehicles both whilst in our car, cycling and on foot.	Y	SEE COLUMN M
273.	38	10	EEG T4 – Traffic Calming and Home Zones	“Home Zone Objectives” – need a reference Photo- these ladies go down Gadbridge Lane every day! (RE: quiet lanes).	Y	SEE COLUMN M
274.	38	10	EEG T4 – Traffic Calming and Home Zones	What are "Home Zone objectives"? These need to be explained or referenced somewhere.	Y	SEE COLUMN M
275.	38	10	EEG T5 – Heavy Goods Traffic	"(notably The Street and Ockley Road)" - this doesn't make sense. The Ockley Road, the Street and the Horsham Road form the only access through Ewhurst that is fully served by a two lane carriageway. By setting a policy to avoid these, it is likely to divert heavy goods via Plough Lane or Lower Breache Lane in an effort to comply which would be much worse. Pedestrian safety and traffic flow need to be balanced against noise pollution and potholes for the alternative routes.	Y	SEE COLUMN M
276.	38	10	EEG T5 – Heavy Goods Traffic	Although the intentions of this policy are laudable, it’s muddled and ambiguous wording means the local planning authority could find difficult to implement. The problems are best explained as follows:	Y	SEE COLUMN M
276.	38	10	EEG T5 – Heavy Goods Traffic	- Why is it confined to “Changes of Use” and not “All new development”?	Y	SEE COLUMN M
276.	38	10	EEG T5 – Heavy Goods Traffic	- Why list several use classes and then say “or other uses”, when it means all forms and types of development and change which could generate heavy goods traffic? What about some forms of commercial and recreational uses like a major equestrian centre or sports stadium which could generate HGV traffic? Is the policy meant to say all developments and uses which could potentially generate considerable heavy goods vehicle movements?	Y	SEE COLUMN M
276.	38	10	EEG T5 – Heavy Goods Traffic	- Why does the policy not encompass other forms of traffic generation? Heavy Goods Vehicle traffic movements through Ewhurst can be a problem but equally there are occasions when the volume of traffic made up by cars and vans creates serious problems. Moreover some developments and uses like major recreational facilities and events generate many times more car traffic movements than HGVs.	Y	SEE COLUMN M
276.	38	10	EEG T5 – Heavy Goods Traffic	- What is a “constrained road”? How does the idea of a constrained road equate with wanting to maintain a free flow of traffic? Why not simply refer to the roads in question?	Y	SEE COLUMN M

276.	38	10	EEG T5 – Heavy Goods Traffic	- The reasoned justification is largely missing and not very specific.		y	SEE COLUMN M
276.	38	10	EEG T5 – Heavy Goods Traffic	- Finally it must be made clear that although such a policy could be implemented by the LPA using planning powers, it would be heavily dependent upon the Highway Authority saying that the policy's requirements can be justified in each case when it arises.	Y		SEE COLUMN M
277.	38	10	EEG T5 – Heavy Goods Traffic	As previously stated in our informal comments, we have concerns about the feasibility/achievability of this Policy. What about size threshold for change of use? As some proposals would be very small hence requesting a Transport Assessment for every proposal of this type may be overly onerous. There is currently no evidence or justification to support the proposal of this Policy. If you have not already, we would recommend that you discuss and you gain a view from Surrey County Council on this Policy.	Y		SEE COLUMN M
278.	39	11	Housing Policies and Sites	We are adamantly opposed to the proposed developments both north and south of Cox Green as they are gross over development of the beautiful rural hamlet of 48 houses in Cox Green.	Y		As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.
279.	39	11	Housing Policies and Sites	a. As most housing development is stimulated by capitalistic profiteering, how will the plan be affected by any significant fall in house prices that might (or might not) be triggered by Brexit?	Y		Noted
279.	39	11	Housing Policies and Sites	b. Affordable housing, by its definition (lack of own private transport) should be located where there are services, including transport, health and shopping; also any such housing should not be sold to speculators but must be sold directly to the occupiers with some form of guarantee that they will retain ownership for a minimum period.	Y		Noted
279.	39	11	Housing Policies and Sites	c. Is there likely to be any effect of the imminent implementation of a second runway at Gatwick on the demand for properties in the Neighbourhood Plan area?	Y		This is currently outside of the scope of the Neighbourhood Plan. It is an issue to be considered through the Waverley Local Plan in the first instance.

280.	39	11	Housing Policies and Sites	We need to minimise large scale development that exceeds the quota the village has to provide. We lack the infrastructure to support larger developments and like Cranleigh they are overpriced for younger local people who wish to remain and many remain empty months and years after being built. To support us as a village we must have affordable housing so we can continue to live locally to support families and friends. The population is ageing and needs support. Unless you can afford to pay more to keep family and friends local. We need to stop supporting people who are just out to gain financially by over developing their land or gardens for pure financial gain without paying attention to what the local economy and community need. The Bulls Head development is an example as it may save the pub which we need to keep the village alive without the development the pub is not viable and would likely close making way for a larger development so people who opposed it should welcome it and use it and stop	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.
281.	39	11	Housing Policies and Sites	I do not understand how a site or sites can even be considered to be suitable in such a central location of the village. Terrible access and after the carnage caused by works traffic to villagers and road users on the recent build (cherry tree)	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.
282.	39	11	Housing Policies and Sites	Why, when we have reached our agreed level of additional housing do we at this stage need to put more potential sites forward. Surely it would be more sensible to hold these back until more housing is required if it ever is.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.

282.	39	11	Housing Policies and Sites	There are huge developments going up around us.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.
282.	39	11	Housing Policies and Sites	The housing that is being built is still out of the price range for our adult children to purchase so there is little hope of keeping families together in an area.	Y	Noted
282.	39	11	Housing Policies and Sites	The area continues to grow in population and there is no additional provision for already over prescribed health facilities and schools.	Y	Noted
282.	39	11	Housing Policies and Sites	The road conditions are awful now, with more traffic they will get worse too.	Y	Noted
283.	39	11	Housing Policies and Sites	I would like to see the paragraph relating to the possible housing sites removed, as it could encourage developers to think they have a chance of cashing in. We have exceeded our quota, so it is irrelevant.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.
284.	39	11	Housing Policies and Sites	I don't quite understand why you have focused just on Ewhurst for your extra houses and not Ellen's green? Why is it a plan for Ellen's green if nothing is happening for them? Why are you focusing all your attention in the heart of the village? Where access is clearly an issue? Why are you not considering the field owned by John Gaines where access isn't an issue and it would affect less people? The fields behind the street are edging a conservation area and the lane you propose is single track - clearly someone isn't thinking straight? Why don't you look for sites outside of the main village centre? Your proposed sites make no sense for the village at all	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.

285.	39	11	Housing Policies and Sites	I'm shocked that such poor sites with quite possibly the worst access could even be considered especially in such a central location. The village is already overly busy with constant backing up of traffic. Why do we even need more housing when there are so many houses being/been built in Cranleigh.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
285.	39	11	Housing Policies and Sites	There just simply isn't the infrastructure to support all this building madness	Y	Noted
286.	39	11	Housing Policies and Sites	"The Waverley Borough Council Local Plan has policies on affordable housing" Change to read "The Waverley Borough Council Local Plan has policies around affordable housing, based on objectively assessed need and backed by evidence," "The Ewhurst and Ellens Green Housing Needs Survey (October 2013) provides insight for the need for affordable housing within the Parish" Change to "provides some limited insight" "The Ewhurst and Ellens Green Neighbourhood Plan delivers the requirement for Affordable Housing while maintaining the flexibility necessary to meet the specific local requirements needed within our proposed housing developments" We are not proposing and housing developments! This needs to be updated to reflect this. "The poor availability of affordable housing in the parish justifies a higher level of provision than that specified in the Local Plan." Given that we are no longer allocating sites, this statement seems to be inviting additional development quite strongly. The survey from October 2013 is less relevant now that 115 new consents have been granted. This section (along with Policy EEG H2) should be updated to reflect the new situation and make it clear that any future development should aim to delivery 40% affordable to continue to address any imbalance with the existing stock. The wording of this whole section gives the impression that there is a desperate unmet need which could easily be misread by a planning inspector.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.

287.	39	11	Housing Policies and Sites	As Ewhurst has exceeded the minimum housing requirement by 20 houses /20% of the figures set by Waverley over the period of the Plan, then no further sites should be put forward for housing consideration. Any further housing should only be built on brownfield sites (such as the brickworks) and not on greenfield rural locations such as The Street/behind the Village Hall and off Wykehurst Lane. Therefore I object to any further sites being proposed/suggested for the duration of the Plan. Just because a developer may deem a brownfield site unviable should not preclude it from being developed/put forward as a valid future residential development site. Plenty of other flood risk sites have been granted planning permission recently in Cranleigh so this is also not a valid argument either for not putting forward some of the local brownfield sites. I therefore disagree with the selection of the sites that may be considered in the future and would wish these to be reconsidered to brownfield sites only even if they are outside of the village settlement.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
288.	39	11	Housing Policies and Sites	Site identification - still needed surely? There will be more pressure for houses in the future, so we should say more prominently where we would like them to be. This information is very well hidden in an separate long and indigestible document.		At this point it is not felt that this information is needed and its inclusion in the Reg 14 draft has caused some confusion and misinterpretation over the aim of the Plan. It has therefore been removed. The information will remain useful should Waverley review their Local Plan and seek to update the target for the Parish. This is something to be addressed in the future rather than now.
289.	39	11	Housing Policies and Sites	The choice of possible future sites for development by the professional advisers. The parish already faces traffic problems from the sites approved at Cherry Tree Lane, and behind Larkfield, neither of which has safe access arrangements, yet the advisers have chosen sites which have similar access problems, over sites which could be integrated into the village safely, just because they are outside some untouchable village boundary. I would prefer to see the village grow in a safe planned way, than this extreme example of infill that uses every last square metre of space within the current village boundary.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
290.	39	11	Housing Policies and Sites	Policy Numbering. We note that there does not appear to be a Policy EEG H1, we would advise renumbering policies EEG H2, H3, H4 and H5 to avoid confusion.	Y	Agreed

291.	39	11	Housing Policies and Sites	In order to meet the clear need for small scale development of up to say 6 units within the village settlement boundary that would provide for smaller houses so that those over 65yrs. (36%) are able to downsize thus creating opportunities for those around 35yrs (6%) to remain in village rather than migrate out to large scale developments elsewhere. The suggestions by consultants for possible sites are in general unacceptable, only Sixpenny Buckle for 4 units is acceptable in maintaining the need for minor developments. All developments should only be acceptable if 6 or less and are within the settlement boundary, thus avoiding expansion of Ewhurst into the rural countryside. We must maintain the current Village settlement boundary thus preserving our way of life and avoiding becoming more urban like Loxwood and Cranleigh.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
292.	39	11	Housing Policies and Sites	I am very pleased to see that there are already sufficient sites for the houses required to be built in the next 5 years and that the plan is to restrict further development to within the boundaries of Ewhurst. In addition, as a resident of Cox Green, I am very grateful to the Council for opposing development of the land both to the east and west of Cox Green hamlet. Either, let alone both, of these schemes would inevitably alter the whole character of the neighbourhood	Y	Noted
293.	39	43810	Housing Policies and Sites	I heartily agree with the recommendation that the Porsche garage is removed and replaced with houses, which could be small, 1 and 2 bedroomed terraced houses. This would be one development which would actually improve the village.	Y	As a previously developed site within the settlement boundary, if the proposal accorded with the relevant policies in the plan there is no need for it to be allocated in order for it to be redeveloped as a housing site at some point in the future.
294.	39	43810	Housing Policies and Sites	There is already approval for over 100 new homes to be built in Ewhurst, so there is no need for more. The roads cannot take any more traffic and what traffic there is needs to be calmed before there are any more accidents.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
295.	39	43810	Housing Policies and Sites	1. I disagree with coalescence dominating planning. In a few years this could simply lead to adding yet another field to the new boundary. E.g. Larkfield leading to Fire Thorne and Chanrossa leading to?	Y	Noted. The plan contains a policy aiming to prevent coalescence of communities

295.	39	43810	Housing Policies and Sites	2. Point 1 would have negated previous growth; all of which is historical and subject to outside inspectors' decisions, whatever the Parish council or the Neighbourhood plan says.	Y	Noted. The plan contains a policy aiming to prevent coalescence of communities
295.	39	43810	Housing Policies and Sites	3. Sustainability as a guide is almost irrelevant in this area and an unnecessary diversion.	Y	Noted
295.	39	43810	Housing Policies and Sites	4. The term 'Affordable housing' requires specific explanation. 'Help to Buy' schemes require substantial incomes and equity. They simply assist the Developer and above-average earners. In this locality, affordability should be for average and below incomes, such as nurses, postmen, teachers, policemen etc. The cheapest 'Help to Buy' in Cherry tree is on average £400,000 and even with this scheme beyond any average earner. Shared ownership at 30% share, 70% rental is much more realistic. The 4 x 2 bed properties at Cherry Tree have already been spoken for. 'Affordable rental' would be more appropriate.	Y	The policy on affordable housing has been removed as it conflicted with National policies and Waverley Local Plan
295.	39	43810	Housing Policies and Sites	5. I don't agree that we should assume that the numerical target has been met. I suspect this minimum will be added to either by Waverley in a few years time or by pressure from Developers which Waverley would see as a means of coping with pressure elsewhere. Therefore we should be future planning for these possibilities.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
295.	39	43810	Housing Policies and Sites	6. Revisit the idea of village/housing association homes by the village allotments. In addition, encourage occasional single/double developments as these have less impact than large developments.	Y	This is noted for future revisions of the plan.
296.	39	43810	Housing Policies and Sites	Ewhurst has already got 120 homes that are going to be built therefore there is no need to increase it any further. I am concerned that the "Called for Sites" identify a further 14 areas where houses could be built and the majority of them are in inaccessible places. In particular the site up Wykkehurst Lane which would cause lots of traffic congestion and the Thornhurst Lane site which has an extremely narrow access road and when exiting to 'The Street' it is very difficult for cars to have a good view of oncoming traffic.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.

296.	39	43810	Housing Policies and Sites	With increased numbers of cars using this road it would be a very dangerous area.	Y	Noted
296.	39	43810	Housing Policies and Sites	It seems unbelievable that these are the areas that have been identified as good options. I hope that common sense will prevail and that Ewhurst should not increase in size, let alone double in size as we need to retain the beauty and safety of the village.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
297.	39	43810	Housing Policies and Sites	I note that the quota of 100 new dwellings laid down by Waverley Borough Council has already been exceeded, as 115 have been approved. I believe this should take the area to 2032. So -- no more building can be approved presumably?	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
297.	39	43810	Housing Policies and Sites	I am supportive of the draft to date.	Y	Noted

298.	39	43810	Housing Policies and Sites	<p>If we have understood correctly, the Parish Council has been through the required procedure of calling for and analysing potential sites for housing development, from which some 16 sites are for The Waverley Borough Council (WBC) to assess. However, the Councils position is that as WBC plan to 2032 requires only 100 additional units for the parish and 110 units have already been approved, there is no more action is required on this point. This seems somewhat complacent. In the recent Planning Appeal on the site adjacent Sayers Croft the appellant raised the point that Waverley may not in fact complete its quota or its quota may be increased (e.g. recent press comments re Woking's overspill or a change in Dunsfold New Town) which the planning inspector dismissed. However, this raises the question as to how legally robust the Parish Council's position is when the quota has been completed at the very start of the planning period, when so many additional sites have been identified. What legal advice has been taken on this conclusion?</p> <p>WBC has designated Ewhurst a 'small village' whereas Ellen's Green and Cox Green are undesignated where only 'windfall sites' will be permitted. Is your definition of a 'windfall site' as regards Ellen's Green the legal accepted one or can it be challenged?</p> <p>Take for example the Neighbourhood Plan's approach in the context of Planning Application WA/2018/1109 2 July 2018, for 53 dwellings in Cox Green and possibly another 90 in phase 2? This is neither a windfall site nor infill as covered in the permitted development for Ellen's Green. The weak response from Ewhurst PC (compared with the robust opposition from neighbouring Rudgwick Parish Council) was that it would not favour the application until the neighbourhood plan had been passed. Fortunately, Waverley refused the application, the</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear. The appeal against the refusal of an application for up to 57 homes on land south of Windacres Farm (ref WA/2018/1458) was dismissed on the 15/11/2019. In his decision, the Inspector commented that the effect of the proposals on the character and appearance of the area would be considerable due to the change in landscape and visual character and the incongruous form of the development in this part of Rudgwick and Cox green.</p>
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299.	39	43810	Housing Policies and Sites	Another major concern I have is that even though we have met and exceeded the government's target for 100 houses in Ewhurst, and that no further site allocations are needed as part of the Plan, future potential development sites have been identified. My feelings are, that the Government's recommendations for A Neighbourhood Plan is supposed to be about developing policies for the development and use of land. There is no mention of identifying future suitable land sites. The Government took their lead through the Localism Act 2011, which identifies the importance of communities shaping the area through the production of a Neighbourhood Plan, which also address the community being involved in setting policies, which assist in determining planning applications, and also just as importantly has NO mention of predetermining development sites for the future. I do not believe this should be part of the plan, and also have objections to some of the sites planned and the format that has been used to identify these sites.	Y		As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
300.	39	11	Housing Policies and Sites	11.1 Paragraph 1: Need updating to reflect recent approvals/have met target	Y	Agreed	
300.	39	11	Housing Policies and Sites	- Restate plan goes to 2032 so important for any future development.	Y	Agreed	
300.	39	11	Housing Policies and Sites	- 1.1 is an introduction not a subsection.	Y	Noted	
300.	39	11	Housing Policies and Sites	Bullet points in section 11.2 - You are not proposing anything additional to WBC RE older person's housing therefore the statement "consideration will be given" is incorrect.	Y	Agreed	
300.	39	11	Housing Policies and Sites	The plan supports the development of (paragraph 4) - not strictly true given no longer proposing sites – could be interpreted as "additional affordable housing over and above already approved new developments". I for one do not endorse that (suggest you check wording throughout).	Y		As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.

300.	39	11	Housing Policies and Sites	Paragraph 5 – what, if anything, can you do to afford priority to the locals?	Y	Affordable housing can only be used to accommodate people on the housing register. This register is managed by Waverley Borough Council and the Neighbourhood Plan has no influence over it. However, to be included on the register you must have a local connection to Waverley.
300.	39	11	Housing Policies and Sites	Paragraph 6 – accuracy of statement (last sentence) needs to be checked on 9/15 affordable homes references in the backward point/firethorn planning applications.	Y	Agreed
301.	39	11	Housing Policies and Sites	There seems to be a slightly different approach to the '100' new houses as Ewhurst's share of the Waverley plan - at 11.1 it refers to a 'minimum' of 100 houses, while in other places e.g. 12.1 it refers to the 'target' of 100 being fully met. For clarity would it be helpful to make it clear if the Waverley plan suggest a minimum of 100 (and therefore an unquantified maximum?) or if it is a 'target' that we have met and therefore there are no grounds for Waverley to suggest we have more. Or I may be misreading that!	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
302.	40	11	EEG H2 Affordable Housing	In principle this policy is supported as the draft plan does start to offer some local justification for departing from the requirement of the Waverley Local Plan (LPP1). However there are a few issues about the policy which need to be resolved before there can be any confidence that the LPA can implement it and enforce its requirements.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
302.	40	11	EEG H2 Affordable Housing	- Where are the designated rural areas and non-designated rural areas or even non-designated areas as the first paragraph says)? Does the latter mean within the settlement and built-up area plus those parts of the Parish which are countryside outside the settlement and built-up area which are not AONB?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
302.	40	11	EEG H2 Affordable Housing	- The policy needs a plan or map to indicate which areas each clause applies to.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
302.	40	11	EEG H2 Affordable Housing	- How does the ideal of development in non-designated rural area i.e. in the countryside equate with the constraint on housing development in those areas as in the draft plan and adopted Local Plan?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.

303.	40	11	EEG H2 Affordable Housing	I am supportive of a neighbourhood plan providing practical sites with affordable housing for young people. I am disappointed that it has taken over 5 years for this draft plan to be put together. The draft plan is poor and has a number of inaccuracies and does not fulfil the need of providing housing in suitable locations for young people. I have lived in Ewhurst my whole life (29 years) and over the years I've been sad and disappointed to see many friends I have grown up with having to move to different areas that are more affordable because there are not enough affordable housing options available within the village.		Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
304.	40	11	EEG H2 Affordable Housing	This policy conflicts with the recommendation on page 31 of the Sustainability Appraisal Assessment that says a figure of 30% Affordable Housing is considered to be the more sustainable option. Therefore there should be acknowledgement of this and justification shown in the NP why the Parish Council are proposing a figure greater than is supported by the review consultation they took.	Y		This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
305.	40	11	EEG H2 Affordable Housing	This policy seeks to set an affordable housing requirement of 40% which is 10% higher than the adopted Local Plan. This is not sufficiently justified and based on an old Housing Needs Assessment. Indeed the Sustainability Assessment notes the discrepancy and states, "However, the level of affordable housing is above the target set out in the Borough Local Plan (which has been viability tested) and so could act as a barrier to the delivery of new market and affordable homes. "This is a therefore conflict with the Development Plan and national guidance and a concern the NP will fail the "Basic conditions" test. The policy requires 40% affordable housing on-site for development of 11 or more dwellings. It then states where the net number of dwellings is fewer than 11 units 40% affordable housing is required in the form of a financial contribution. This is against the advice within the NPPF paragraph 63 which expressly prohibits this. Again, a conflict which will mean the NP would fail the "Basic Conditions".Recommendation Reduce the 40% requirement to 30% to bring it into parity with the adopted Local Plan. Delete the second paragraph of policy H2.Alternatively, detailed and robust housing analysis and assessment would be required to justify this policy.	Y		This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.

306.	40	11	EEG H2 Affordable Housing	The affordable housing requirement set out in this policy is not in conformity with Local Plan Part 1 policies AHN1 (Affordable Housing on Development Sites) and AHN2 (Rural Exception Sites). We consider that this matter is addressed and justified at a strategic level within LPP1. This Policy is also in conflict with National Policy, which requires affordable housing for sites of 6-9 dwellings in designated areas as generated a commuted sum, and for sites 10+ as on site affordable housing provision. If the issue in the Parish is to promote more affordable housing to meet a local needs within the Parish then the recommended route would be through rural exception sites (see LPP1 Policy AHN2). You would need evidence to demonstrate this.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
307.	40	11	11.2 Affordable Housing	Comment. Add third bullet point Housing Mix and Tenure report with appropriate footnote. Reason for this suggestion is policies need to be justified by data not just by views. The Housing Mix and Tenure report provides such hard data.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
307.	40	11	11.2 Affordable Housing	Page 39 Penultimate para. Comment. Is there a reason that a Community Land Trust has not been explored as a means of enabling priority to be given to local residents for affordable homes? Is it too late to incorporate this idea (or similar) into the NP and how the parish might organise for this in the future?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
308.	40	11	EEG H2 Affordable Housing	There should be stricter commutation rules; recent events have shown how developers can overcome this (and other) provisions by failing to complete or not marketing the last unit. Suggested alternative wording: commutation will be allowed until at least half of the units within development are completed.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
309.	40	11	Policy EEG H2 Affordable Housing	In principle this policy is supported as the draft plan does start to offer some local justification for departing from the requirement of the Waverley Local Plan (LPP1). However there are a few issues about the policy which need to be resolved before there can be any confidence that the LPA can implement it and enforce its requirements.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
309.	40	11	Policy EEG H2 Affordable Housing	- Where are the designated rural areas and non-designated rural areas or even non-designated areas as the first paragraph says)? Does the latter mean within the settlement and built-up area plus those parts of the Parish which are countryside outside the settlement and built-up area which are not AONB?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
309.	40	11	Policy EEG H2 Affordable Housing	- The policy needs a plan or map to indicate which areas each clause applies to.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
309.	40	11	Policy EEG H2 Affordable Housing	- How does the ideal of development in non-designated rural area i.e. in the countryside equate with the constraint on housing development in those areas as in the draft plan and adopted Local Plan?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.

310.	40	11	Policy EEG H2	H2 Affordable Housing. Comment - Has this 40% target (which is so far above Waverley's 30% target) got the Waverley's backing? We support an affordable housing target of 40% which we know will help the housing needs of our community. There is good evidence in the Housing Mix and Tenure report to support an affordable housing percentage above the then (and as it turns out now) 30% in the Local Plan. That report did not make a specific recommendation because of concerns about viability issues, but instead recommended testing out with Waverley what percentage might be feasible and not fall at the first hurdle of a planning application.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
310.	40	11	Policy EEG H2	Comment. Have any checks/calculations been made on whether the 40% aspiration conflicts with viability when taking into account the policy proposals on housing mix size distribution and density per hectare.?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
311.	40	11	Policy EEG H2	"within the Area of Outstanding Natural Beauty" Again, what about the AGLV?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
312.	40	11	11.2 Affordable Housing	I cannot work out the numbers - 1010 housing stock, 874 households, all households 923 - perhaps I have misunderstood the text.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
313.	40	11	Affordable Housing	This imbalance" in paragraph 1 – still true?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
313.	40	11	Affordable Housing	"Lack of affordability" end of paragraph 1 – given affordability has a precise definition in planning terms I suggest the use of a different word.	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
313.	40	11	Affordable Housing	Policy EEG Box - Paragraph 1 – though AONB was ruled out for "multiple development"	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
313.	40	11	Affordable Housing	Policy EEG Box- Paragraph 1 – to who, for what?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.
313.	40	11	Affordable Housing	What is a non-designated area in the context of this NP?	Y	This policy has been removed as it conflicted with National Policy and the Waverley Local Plan policy.

314.	41	11	Policy EEG H3 Size of Homes	<p>In principle this policy is supported as the draft plan does start to offer some local justification for departing from the requirement of the Waverley Local Plan (LPP1). However there is one issue to be resolved before there can be any confidence that the LPA can implement it and enforce its requirements.</p> <p>How does the neighbourhood plan “equate” requiring at least 70% of new houses being 3 bedroom or less and also requiring at least 40% affordable with the requirement for a maximum 11 dwellings per hectare. The combination of all these requirements will make every development not viable. In fact it is almost certain that requiring 70% small houses and 40% affordable would not be viable for any private development even if the land was provide free!</p> <p>There is no objection at all to either the affordable housing requirement or the small housing requirement of both Policy EEG H2 and EEG H3. However the neighbourhood plan must be careful to avoid misleading the community about whether the LPA will be able to implement this policy and to require all new housing development the specified number of affordable and small houses.</p>	Y	See Column M
315.	41	11	Policy EEG H3 Size of Homes	<p>Presumably this policy, when coupled with the density policy H5, plays a role in determining how many houses can be fitted in a certain size site. It is not at all clear how this fits in with Shrimplin Brown HLA report and the way that recommends density on the sites proposed which appears to be on a different basis. The PC need to decide which to support and for sake of clarity be explicit in the NP where they do not accept the recommendations in the supporting documents, otherwise inconsistencies will continue to prevail causing much confusion.</p>	Y	See Column M
316.	41	11	Policy EEG H3 Size of Homes	<p>H3 comment. First sentence This conflates the parish survey and the Housing Numbers Mix and Tenure report when referencing residents’ views. We suggest the two are separated out. Residents views as expressed in the parish survey are very important, but the Housing numbers etc. report gives statistical support for justifying and delivering on those views. Taking on this comment will strengthen the justification of policy H3.</p>	Y	See Column M
316.	41	11	Policy EEG H3 Size of Homes	<p>Policy H3 Comment We agree with the proposed mix.</p>	Y	See Column M

317.	41	11	Policy EEG H3 Size of Homes	I note that on developments of less than ten units, there is no requirement to provide smaller dwellings. As developments within the plan area are likely to be smaller sites, Policy H3 should apply to sites of, say, six units or more. In the proposed policy, a development of 6 units could (and probably would) produce 6 four-bedroomed houses, whereas on my revised proposal the site mix would be, say, 2 each of one, two and three bedroomed units which is more in keeping with the requirement to provide smaller and affordable housing.	Y	See Column M
318.	41	11	Policy EEG H3 Size of Homes	LPP1 Policy AHN3 requires proposals for new housing make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA). The most recent SHMA is the 2015 SHMA which recommends the following mix of market housing: 10% x 1 beds, 30% x 2 beds, 40% x 3 beds, 20% x 4 beds. The SHMA recommended affordable housing mix is 40% 1 beds, 30% 2 beds, 25% 3 beds, 5% 4 beds. The housing mixes set out in the draft Policy H3 are not in conformity with Local Plan Part 1 policies AHN1 (Affordable Housing on Development Sites) and AHN3 (Housing Types and Size). Unless there is clear and justifiable evidence for doing so, we recommend that the dwelling mix outlined in the West Surrey SHMA is used. We do not consider that the policy justification given is sufficient to justify a different approach to that set out in Policy AHN1 and AHN3 within LPP1. It is also recommended that you look at the Examiner's Report for Godalming Neighbourhood Plan in relation to this matter.	Y	SEE COLUMN M
319.	41	11	Policy EEG H3 Size of Homes	The policy seeks to deviate from the SHMA approach in Waverley Borough. This appears to be based on the results of a Resident Parish Survey. There is concern that this will be insufficient justification to deviate from adopted Development Plan policy. Recommendation: To ensure that the evidence base is sufficiently robust we recommend updating the Housing Needs Survey.	Y	SEE COLUMN M
320.	41	11	Policy EEG H3 Size of Homes	"robust justification" Without a more precise definition, this is open to abuse or misinterpretation.	Y	SEE COLUMN M
321.	41	11	Windfall sites	"through the allocated sites" We are not allocating any sites! This needs to be updated.	Y	Agreed
321.	41	11	Windfall sites	"some very limited infill development may be appropriate in the 'small villages' (Ellens Green)" What about Cox Green?	Y	Agreed, this has been clarified to refer to Ellens Green which is the only community with a settlement boundary in the Parish

322.	41	11	Windfall sites	The plan notes that there are 188 windfall sites that are likely to be approved in the area and with that in mind and the fact that we have already met our 100 quota then we should be discouraging further visits, not behaving like lambs to the slaughter and encouraging the even-faster erosion of the village identity. This paper should be amended and reference made within the main report that we have delivered, as significant cost, what has been asked of us and that we would resist further requests until 2032.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.
323.	41	11	Windfall sites	“through the allocated sites” – you haven’t allocated any	Y	Agreed
323.	41	11	Windfall sites	“continue to be acceptable” – to who?	Y	Noted
324.	41	11	Windfall sites	Please clarify if windfall sites outside the settlement boundary will be supported or not. The implication is they would not be, but this should be explicit.	Y	That is correct, windfall development is not supported outside of the settlement boundary. This has been clarified.
325.	41	11	Windfall sites	First para, first sentence Comment Delete the phrase “through the allocated sites” and replace with “having already delivered the Local Plan allocated numbers”.	Y	Agreed
325.	41	11	Windfall sites	Comment This first para (as revised) should be repeated at the beginning of section 12. It is pertinent to why future development should not be encouraged.	Y	Noted
325.	41	11	Windfall sites	Second para. Comment. Suggest insert a sentence at the start of this para to put what comes next in context - as follows: “The Waverley local plan expects the villages between them to make a contribution to the windfall allowance assumed in the Local Plan”.	Y	Noted

326.	41	11	Housing Policies	At present there definitely is not an appropriate mix of market and affordable housing being built. New developments are targeted at expensive large executive type houses, for example Swallowhurst. With latest developments, i.e. Cherry Tree Lane being very high density, mostly medium/ larger houses, resulting in very slow sales. The distinct lack of so called 'affordable housing' could have been addressed with building on such a site as Cherry Tree Lane (within the village) being given permission for small 1 bed houses. We strongly agree with the statement that 3/4/5 bedroom newly built houses should be reduced to offer more 1/2 bedroom dwellings. It is our opinion that the ratio of 1 bedroom houses should be increased to 25 or 20%, with a reduction in three beds.		Y	Noted
326.	41	11	11.2 Affordable Housing, Size of New Homes	However this becomes a mute point if we have reached our identified need of housing. Further building is not necessary or desirable. Perhaps this policy should apply to infill or windfall sites only.	Y		Noted
327.	42	11	EEG H4 Infill Housing and Windfall Sites	Comment. we support this policy.		Y	Noted
327.	42	12	EEG H4 Infill Housing and Windfall Sites	Comment. The criteria b) and c) from Policy H4 lend themselves for inclusion in policy H5.		Y	Noted, but they are also an important part of the policy and need to remain in H4
328.	42	11	EEG H4 Infill Housing and Windfall Sites	This policy uses a number of terms that are considered loose and therefore make it harder for the policy to be applied as the NP might wish e.g. 'restricted gap', 'closely surrounded', 'unneighbourly development' and 'unsuitable access'. It is recommended that these terms be defined with greater clarity. Sub-section d requires one 1 or 2 bed dwelling for every 4+ dwelling. This does not accord with the mix identified in policy H3 and is therefore an internal conflict within the NP.	Y		SEE COLUMN M
328.	42	11	EEG H4 Infill Housing and Windfall Sites	As written the policy applies to both infill development which is a specific type of site and windfall development which is much broader development and would not be subjected to the same type of constraints as infill development. This is considered confusing and could benefit from splitting the two types of development into separate policies.		Y	SEE COLUMN M

328.	42	11	EEG H4 Infill Housing and Windfall Sites	It is not clear why the words, "In exceptional cases..." have been applied to windfall development within Ellens Green. This again could be better defined. Similarly, the local needs reference is not the correct application of policy to windfall development. It will not help boost housing which is current national guidance. It is also worth considering a 'rounding off' policy in these circumstances. Recommendation: Provide detailed definitions for the phrases identified above – perhaps through the addition of a glossary; Add a new separate windfall policy that recognises the importance that such development can have and does not restrict it in the same manner as infill development; Add a rounding-off policy i.e. provision of housing which will compete the settlement pattern to defensible boundaries; Delete the final paragraph of policy H4.	Y	SEE COLUMN M
329.	42	11	EEG H4 Infill Housing and Windfall Sites	"avoids harm to heritage assets and their settings." change to include "avoids harm to heritage assets, their settings and the surrounding environment."	Y	SEE COLUMN M
329.	42	11	EEG H4 Infill Housing and Windfall Sites	"where the development would meet local needs only." Is this legally watertight? What are the implications of including it from a planning perspective?	Y	SEE COLUMN M
329.	42	11	EEG H4 Infill Housing and Windfall Sites	"confirmed that the maximum density of dwellings be 11 dwellings per hectare" Change "maximum" to "preferred". Also 11 dph is not what the HLAA is based on. This needs to be corrected one way or the other.	Y	SEE COLUMN M
330.	42	11	EEG H4 Infill Housing and Windfall Sites	We suggest changing 'redevelopment sites' to 'previously development land/brownfield land' so it accords with the definition in the NPPF. We consider that in Part b. the term 'unneighbourly' is subjective and would be difficult to apply in practise from a planning perspective. We suggest amending this part of the Policy. This requirement would not be in conformity with LPP1 Policy AHN3, nor the proposed housing mix proposed within the EEG NP, Policy EEG H3. We recommend the removal of this part of the Policy. It is not possible to apply local selection criteria, other than in the case of a rural exception site. We therefore suggest amending the reference to 'where development would meet local needs only'.	Y	SEE COLUMN M
331.	42	11	Section 11.5 Design and Density Principles	"The 2017 Parish consultation confirmed2 – either "approved the proposal of" or "confirmed the acceptability of" instead. Says there is a table but it isn't actually written in a table. Link in the reference at the bottom of the page links to the survey and not to the results.	Y	Agreed
332.	42	11	Section 11.5 Design and Density Principles	In terms of the Policy referring to the design statement, we consider that this is a logical and perfectly acceptable approach.	Y	Noted

332.	42	11	Section 11.5 Design and Density Principles	However, Waverley has not been involved with the development of a design statement for Ewhurst. The Ewhurst Village Design Statement has never been presented to or adopted by WBC for use when determining planning applications. We would urge you to have further discussions with us on this matter. In regards to density, as previously discussed, there is not sufficient evidence to justifying the density requirements proposed. We have concerns with how you are calculating density as it is not a standard approach (which is generally dwellings per hectare rather than habitable rooms) – this will possibly cause problems for implementation and officers calculating. Additionally such a density approach (of 11 per hectare) seems unduly prescriptive, especially as it is not a range. If this Policy is successful you will need to manage your expectations on implementation. The approach to density isn't one that would ensure that new development is suitably responsive to the surrounding context.	Y	SEE COLUMN M
333.	42	11	Section 11.5 Design and Density Principles	General comment. We can understand the policy direction but not much else in this section as it's muddling and confusing.	Y	SEE COLUMN M
333.	42	11	Section 11.5 Design and Density Principles	First para Comment - Agree wholly with this para, on condition that there is clarity about what is meant by 'surrounding area' and 'local', and that any density will have regard to the characteristics of its immediate environment to correspond with what is said in this para in relation to the historic lack of uniformity.	Y	SEE COLUMN M
333.	42	11	Section 11.5 Design and Density Principles	Second para Comment - What is the point of all these calculations about habitable rooms? This habitable rooms approach has not been used by Shrimplin Brown, so what part will it play in housing policies.?	Y	SEE COLUMN M
333.	42	11	Section 11.5 Design and Density Principles	Comment. It is very unclear how the average 11 dph figure - which seems to be a benchmark - fits with local densities respecting local areas; and also how it fits with al the work Shrimplin Brown did to compete site capacities. This is all so confusing.	Y	SEE COLUMN M
334.	42	11	Section 11.5 Design and Density Principles	There is really very little point in having this section unless it is subjected to quite drastic change to make it conform to Government planning guidance about what can and cannot enforced with respect to specifying the density and design of new housing development.	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	Section 11.5 – From “The built-form to = 27 dwellings per hectare”.	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	The purpose of this section is unclear for there is no policy. If it is intended to specify densities for new housing development for all the plan area, it is not appropriate to include in the plan and is not achievable using planning powers.	Y	SEE COLUMN M

335.	42	11	Section 11.5 Design and Density Principles	- The last sentence of the first paragraph is more or less correct but is not a "policy" which is unique to the plan area. It repeat, badly, something said in planning guidance and legislation.	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	- You cannot lay down a maximum density for development for all the plan area. As the above mentioned sentence effectively says "each proposed development including what is the most appropriate density must be determined on a case by case basis having regard to the surrounds and other material considerations".	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	- A "blanket maximum development policy" is not appropriate anyway for as the first part of the section says there is no uniformity in the design and therefore the density in the built form of the parish. Indeed elsewhere in the draft plan it actually says that there is a vast variety of designs and a great range in the density in the settlement of Ewhurst – some areas exceed the 11 dwellings per hectare by several tens of multiples.	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	- In fact should it actually say 11-12 dwellings per acre or 25-26 dwellings per hectare? 11 per hectare is a very low density. There can be very few areas of the settlement which are at 3 or 4 dwellings per acre.	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	- It does not matter that the community confirmed that a maximum density of 11 dwellings per hectare be applied if the community was being misled as to what that meant in practice and what was appropriate to include in a plan.	Y	SEE COLUMN M
335.	42	11	Section 11.5 Design and Density Principles	- Finally those drawing up the plan do not appear to have recognised that there is an inherent conflict between stating a very low maximum density for new housing development and saying that new housing should most be small housing and seeking more affordable housing. New housing schemes will just not be viable and deliverable in that case.	Y	SEE COLUMN M
336.	43	11	EEG H5 Design and Density	This Policy is also quite pointless as it stands and cannot be implemented by the LPA.	Y	SEE COLUMN M
336.	43	11	EEG H5 Design and Density	In so far as the policy says "Proposals for all forms of new development must respect and adhere to the design, density and layout of the surrounding area" it really says nothing more than the requirements for all developments in all areas in all parts of the country.	Y	SEE COLUMN M

336.	43	11	EEG H5 Design and Density	Reference to the Village Design Statement is however also inappropriate and not implementable by the LPA. The LPA cannot enforce all new development to conform to any statement of design. Planning legislation does not allow this to happen and local planning authorities have been repeatedly urged to not try to lay down inflexible design rules unless there are sound planning reasons on a case by case basis.	Y	SEE COLUMN M
336.	43	11	EEG H5 Design and Density	A LPA can use a properly and expertly prepared DESIGN GUIDE as a guide to what it considers would constitute good design and an appropriate density and layout for new development on a case by case basis. But it cannot enforce a guide without producing on each occasion sound and specific planning reasons.	Y	SEE COLUMN M
336.	43	11	EEG H5 Design and Density	This Policy should be rewritten to say something to the following effect: "The Parish Council considers that all new development and change within the built-up area of Ewhurst Village – as defined by the new settlement boundary, should pay particular attention to fitting in with its immediate surrounds in terms of both design, layout and density of development. It urges all proposers of new development, when considering its design, layout and density to have regard to the guidance provided in the Village Design Statement."	Y	SEE COLUMN M
337.	43	11	Design and Density	"a formula of area of" Change to "a formula for area of"		Y SEE COLUMN M
337.	43	11	Design and Density	" in order to promote future numbers" Change "promote" to "accommodate"		Y SEE COLUMN M
338.	43	11	EEG H5 Design and Density	Policy H5 Comment. We cannot see how policy H5 and its justification relates to this habitable rooms side-debate.	Y	SEE COLUMN M
338.	43	11	EEG H5 Design and Density	Policy H5 Comment. We agree with the principle of this policy, but only if it's made clear it refers to the immediate surrounding locality of the site. All the textual preamble (as commented on above) adds no value or justification for this policy.		Y SEE COLUMN M
338.	43	11	EEG H5 Design and Density	Comment - Is H5 any different from general planning guidance? Will adherence to village design statement pass muster with Waverley planning dept.?	Y	SEE COLUMN M
339.	43	11	EEG H5 Design and Density	The wording of this Policy does not appear to be a conclusion arrived at by incorporating the Design and Density Principles in 11.5. The Village Design Statement referred to in the Policy sets out sound principles but does not quantify density. Therefore are the Design and Density principles meant to be incorporated into Policy H5 or not?	Y	SEE COLUMN M

339.	43	11	EEG H5 Design and Density	Incidentally the Sustainability Appraisal Assessment refers to this policy as H7 rather than H5.	Y	SEE COLUMN M
340.	43	11	EEG H5 Design and Density	“To ensure future development...” – this is a statement of intent and not a justification.	Y	SEE COLUMN M
340.	43	12	EEG H5 Design and Density	- The footnote one page 12 clearly states that NP is based on max. 11.	Y	SEE COLUMN M
340.	43	13	EEG H5 Design and Density	- Does this formula protect the village from >11 density of e.g. Larkfield passed at a higher density than current “practice” (check with ID who has explored this issue)	Y	SEE COLUMN M
340.	43	14	EEG H5 Design and Density	“Policy EEG H5” box – unless I missed it, the VDS assessed via the link makes no reference to density.	Y	SEE COLUMN M
340.	43	15	EEG H5 Design and Density	- If true, and I think it is, state UDS supported by community in 2017 survey.	Y	SEE COLUMN M
341.	43	11	EEG H5 Design and Density	The policy is generally supported, however, the requirement to ‘adhere’ to the design, density and layout is proscriptive and does not match national guidance within the NPPF para 130 which states ‘taking into account any local design standards or style guides’. The policy should be amended to more greatly reflect national guidance. The reference to the Village Design Statement should be accompanied by a commitment to keep it updated to reflect more recent development within the Villages. Recommendation: Amend the word ‘adhere’ in the policy to ‘take account of’. Add text committing the NP Forum to update the Village Design Statement.	Y	SEE COLUMN M
342.	43	11	Village Design Statement	There is discussion around materials but these are not supported by relevant plans and photographs.	Y	Noted, the addition of maps and photos is agreed

342.	43	11	Village Design Statement	Para 4.1.1 states that upon adoption it will become a material planning consideration – however we need to establish if this is adopted as part of the EEG NP or separately. We would welcome discussions on this. In either event, the document needs more work – there are no design guidelines and the design guidance section only refers to Local Plan Policies. Looking more closely the document seeks to include policies (in section 4.5, para 3) which go against existing guidance in an adopted SPD; any Policies should be included in the EEG NP. In addition, the Design Statement explains that EEG Parish Council are proposing to undertake a Building of Local Merit program, however this has never been discussed with WBC. We would welcome discussions on this. Currently, this is not a useable document for development management purposes.	Y	SEE COLUMN M
343.	44	12	Housing Site Policies	We consider that this section could be incorporated into the ‘Housing’ section. It is not currently clear whether the information included within this section is for information or is a Policy. It is not clear what status you are expecting this section to have, specifically in relation to 12.2.	Y	Agreed. This section has been merged with the housing position information at the beginning of the document.

344.	44	12	Housing Site Policies	<p>It is noted that the NP does not allocate housing sites on the basis of the 115 dwellings that have been approved or allowed at appeal since the allocation of a minimum of 100 homes to the NP area within the Waverley Local Plan. Not allocating housing leaves the NP vulnerable to challenge in the future. This is in consideration of paragraph 14 of the NPPF which discusses Neighbourhood Plans in relation to the presumption under paragraph 11d. It states the presumption will apply unless the NP contains “policies and allocations” to meet its identified housing requirement. The Ewhurst & Ellens Green NP contains neither a strategic housing policy nor allocations in its current format. The NP, does however, go on to note that as the housing figure is a minimum any future development if justified should be directed towards the most sustainable locations identified within the HLAA. We have concern that this approach is not sufficiently robust to protect the NP from challenge in the future, requiring an early review to overcome the issue. It is recommended that the NP follow a sequential approach, naming the sites where it considers the future development should go to if justified. This should be based on an updated new housing land availability assessment which takes account of the approved housing in the interim, rather than the ‘light touch’ review of the 2017 work Agreed by Shrimplin Brown – this comment is based upon the update report which states that the work undertaken was on the basis of the site assessment criteria and that a detailed fact checking exercise has not been undertaken. As indicated above, we have promoted the Land at Windacres Site (Ref. No. 12) on behalf of WLG for housing and would like to take the opportunity to make some comments on the analysis within the HLAA and subsequent review following submission of the planning application, as follows:- The</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.</p>
345.	44	12	Housing Site Policies	<p>I do not support the necessity for further development. We are a rural village with an inadequate bus service, heavy traffic already our main road becomes a commuter rat run in the rush hour. The demise of the village pub is likely due to the loss of one of its assets the garden for housing The preschool and village school are limited in their capacity.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear.</p>

345.	44	12	Housing Site Policies	Social care such as access to local GP surgery is becoming limited and likely to mean that patients will need to travel further to receive treatment.	Y	Noted
345.	44	12	Housing Site Policies	Sites 2, 3 & 4 as identified as potential housing are marked as unsuitable due to the access to maple drakes road. The road is narrow in places and during peak hours can be difficult to navigate.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
345.	44	12	Housing Site Policies	site 11 a and b is not suitable due to access coming out on to the roundabout where the bus turns and with more houses being built by the pub will exacerbate the bottleneck of traffic and access.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

346.	44	12	12.1 Parish Allocation	<p>"A Planning Inspector's recent decision" The NP isn't a newspaper. This should be rephrased to be more neutral and less specific to a point in time. The decision won't always be "recent" for example.</p> <p>"Therefore, there is no current necessity to provide for further development and accordingly, no further village site allocations are necessary at this time." NPPF states that an NP cannot have a negative attitude toward development and this is dangerously close to negative. Change to "Therefore no further village site allocations are proposed by the NP at this time."</p> <p>"That said, the Local Plan sets its allocation for our Parish as a minimum, which may come under future pressure. With this in mind, future development, if justified, must be directed towards the most sustainable locations, identified within the Housing Land Availability Assessment and Sustainability Appraisal (Strategic Environment Assessment), which form an essential part of the Neighbourhood Plan."</p> <p>"which may come under future pressure" this is false - the WBC LPP1 is made. Any updates to numbers will require a new Local Plan, at which point this NP will need to be updated. There's no reason in terms of planning policy, in this current plan, to account for this possibility. This was included due to a lack of understanding on the part of the PC and the NP steering group and should be removed.</p> <p>"future development, if justified" is also misleading. The NPPF clearly states a need for more houses which is a defacto justification. Instead, "if justified" should be changed to "in the event that the existing target numbers are increased as the result of a new or updated Local Plan"</p> <p>"In light of Ewhurst having fully met the target of 100 houses allocated by Waverley Borough Council in its Local Plan, there is no current</p>	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
347.	44	12	12.1 Parish Allocation	<p>Factual Correction. Amend 'WBC 2016 Local Plan' to "Waverley Borough Council Local Plan Part 1 (LPP1)" We would suggest updating the 115 figure to account for more recent commitments in EEG. As of 1 April 2019, we have recorded 124 commitments in EEG.</p>	Y	Agreed
349.	44	12	Housing Site Policies	<p>Parish Allocation: As previously stated, needs to be clearly communicated earlier in this document.</p>	Y	Noted

350.	44	12	<p>Housing Site Policies Although the plan states within the text that; no further village site allocations are necessary at this time', the accompanying documents do suggest further potential sites, which seems to invite development on some sites.</p>	<p>Y As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
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351.	44	12	Housing Site Policies	<p>It is our understanding that already having exceeded by at least 15 houses our 15 year housing allocation of 100 minimum set by the Waverley Local Plan with the intention of ensuring that Ewhurst remains a small rural community, we do not have to allocate any further sites at this time. This is clearly stated in the NP para 12.1 in the first paragraph.</p> <p>The second paragraph is unnecessary and we feel should be deleted. As the NP is to be reviewed every 5 years in line with the 5 yearly review of the Waverley Local Plan we strongly advocate that all reference to the Shrimplin Brown assessments and the Garside Sustainability Assessment be deleted from the NP as, firstly, these were assessments only and the choice of any sites should surely be with the residents of the village and, secondly, putting these reports and the NP references to them into the public domain might be used by potential developers as implicit village approval for any given site although actually the villagers have not had the opportunity to give any approval of specific sites. Indeed, if any reference at all appears in the NP about these possible sites it should be clearly stated that the residents have had no chance to discuss the pros and cons of each site so there is no doubt about the fact there should be further consultation of the residents before any site is supported for development. Doubt must be raised about the overall site evaluations in light of the Firethorn Inspector's approval decision in spite of this site being assessed as unsuitable by Shrimplin Brown.</p> <p>To sum up this issue we would like to see Section 12: Housing site policies amended to:</p> <p>a) Delete paragraph two of Section 12.1 Parish Allocation</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
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352.	44	12	Housing Site Policies	Ewhurst and Ellens Green have met and indeed succeeded their target of 100 houses and therefore it seems unnecessary and undesirable to constrain future development under circumstances which could be very different in 10 years hence and on the basis, in my opinion, is a very distorted assessment.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
353.	44	12	Housing Site Policies	Most importantly, I feel uncomfortable with the fact that even though we currently have surpassed the planned number of new houses, possible sites for development are still mentioned in the appendices. Surely, to remain steadfast, we should not even acknowledge that there are any possible sites at all?	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

354.	44	12	Housing Site Policies	<ul style="list-style-type: none"> • I like the way that the future building is to take place within the village of Ewhurst - this keeps the impact on countryside and environs of Ewhurst to a minimum and will limit the further expansion of the existing BUA, striking a balance between meeting the housing requirements of future generations whilst reducing the impact on ancient countryside. • I am grateful for you not including the two proposed estates either side of Cox Green - It is good to see that these estates are not included and this should remain the case regardless of any further revisions to the draft. • I am pleased to see you already have enough sites to cover the 6 year requirement - there appears to be ample land capable of allocation for development within the Ewhurst and Ellens Green areas, negating the need for development "sprawl". This will ensure Ewhurst and Ellens Green sustain there unique village feel and identity, as treasured by all that live in these lovely villages and for future generations of residents to come. 	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
355.	44	12	Housing Site Policies	<p>I do not feel that Ewhurst and Ellen's Green should build any more houses as it has already exceeded the allocation of 100 homes set by Waverley Council. 120 homes have now been sanctioned and so there is no requirement to build any more homes before 2032. I am particularly concerned that the call for sites has identified at least two sites, those off Wykehurst Lane and by the side of the village hall, where access is extremely poor. I am extremely disappointed that on appeal homes identified at Larkfield and at The Bulls Head will now be built. Both sites will have a detrimental effect on the village and put further strain on the infrastructure and on the school. I have lived in Ewhurst for over forty years and feel that plans to develop the village further will completely change the character of this special village. I trust the Parish Council will do all it can to prevent further development.</p>	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

356.	44	12	Housing Site Policies	I am strongly opposed to any more homes being built in Ewhurst, particularly as the target set of 100 has already been surpassed by 20. There is no need to build any more homes for at least fourteen years. I am concerned that the call for sites has identified sites within the village where access would be particularly difficult, namely the ones identified off Wykehurst Lane and by the Village Hall. Both sites would be extremely narrow and would cause traffic issues. The village hall site would be extremely dangerous in an already dangerous road - The Street. Ewhurst cannot cope with an almost doubling of size if these called for sites are allowed to be built. I trust common sense will prevail to enable this village, to remain a village for many years to come.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
357.	44	12	Housing Site Policies	It is our opinion that there should be no further planning applications granted for new build houses around the area of Ewhurst green as the planned developments are dangerously close to existing common land. If we have surpassed the requirements for new development set by Waverley, surely any new planning applications should be vigorously opposed.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
358.	44	12	Housing Site Policies	Housing numbers - Put in a caveat about more frequent post Brexit revisions as five years may be too long - lower immigration states suggest this may already have happened.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

358.	44	12	Housing Site Policies	<p>Housing numbers - Put in a caveat about more frequent post Brexit revisions as five years may be too long - lower immigration stats suggest this may already have happened. Ewhurst's low twenties aged population in the census may be transient whilst at university. Nationally a quarter of 20-34 live with parents. (No's 7/8/19)</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
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359.	44	12	Housing Site Policies	<p>Sec 12 - I disagree with the general scope of this section.</p> <p>Firstly I do not understand why the Ewhurst Village Settlement Boundary is not being redrawn to include sites now consented. Not to do so seems to me to indicate that development can take place outside the settlement boundary, which it usually cannot except in exceptional circumstances -such as rural affordable etc. The danger of this is that if a recent permitted development such as Firethorn remains outside the settlement area, an application for further adjacent development could be considered as an extension of an already permitted development. If Firethorn or any other recently permitted development is within the settlement, any new proposed development to them would be considered as being outside the settlement and in the countryside i.e. contrary to the NP and hopefully Waverley Policy.</p> <p>Secondly I do not understand why the plan talks about any future development, when it could clearly just state that the Parish has met its target under the Waverley Local Plan and leave it at that. My reasons for disagreeing with this approach are twofold.</p> <ol style="list-style-type: none"> 1. It gives the impression that more development could be accommodated. 2. It then refers to the screening assessments of sites bordering the Ewhurst Settlement Boundary. In my opinion these assessments are flawed and totally subjective. The use of wording such as "Development of the site would not be well related to the Settlement Boundary. Development would have a significant urbanising effect on the countryside and a consequent negative impact on the intrinsic character & beauty of the countryside" seems to me making subjective 	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
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359.	44	12	Housing Site Policies	<p>Firstly I do not understand why the Ewhurst Village Settlement Boundary is not being redrawn to include sites now consented. Not to do so seems to me to indicate that development can take place outside the settlement boundary, which it usually cannot except in exceptional circumstances -such as rural affordable etc. The danger of this is that if a recent permitted development such as Firethorn remains outside the settlement area, an application for further adjacent development could be considered as an extension of an already permitted development. If Firethorn or any other recently permitted development is within the settlement, any new proposed development to them would be considered as being outside the settlement and in the countryside i.e. contrary to the NP and hopefully Waverley Policy.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
360.	44	12	Housing Site Policies	<p>I am not supportive of the draft neighbourhood plan to date as I feel it totally unnecessary for Ewhurst to propose more new sites when the required number has more than been exceeded. Surely this is an invitation for developers to come forward with yet more plans for houses.</p> <p>I appreciate the work down by the Neighbourhood Steering Committee but feel by identifying sites it is going to attract more housing development than is required, as I understand it the target should last until 2032. The two preferred sites by Shrimplin Brown both have issues which are acknowledged.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
361.	44	12	Housing Site Policies	<p>I support the draft plan's view that two sites in Cox Green (Land to the rear of Hermongers Lane (east of Cox Green Road - and Land to the south of Cox Green Road) are both unsuitable for development. Two sets of independent consultants have rejected these sites and it is important to note that these sites are in an area designed AGLV.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>

362.	44	12	Housing Site Policies	The plan is fundamentally flawed. At 12(1) it is made clear that there is "no current necessity to provide for further development" as the village has already significantly exceeded Waverley Borough's Spatial Strategy allocation. It is, therefore, gratuitous and regrettable that two further development sites are unnecessarily offered up by the draft plan. Despite the plan's assertions, neither of these sites appears suitable, not least as they add further demands to the already exhausted infra-structure of the village and contravene the plan's vision to "retain the rural environment".	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
363.	44	12	Housing Site Policies	There are NO POLICIES in Section 12. It should be entirely DELETED and a short correct version included before Section 5.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

364. 44 12

Housing Site Policies There are NO POLICIES in Section 12. It should be deleted and replaced Y by a statement of fact positioned BEFORE Section 5 which says something simple and indisputable to the following effect: THE REQUIREMENT TO MAKE PROVISION FOR NEW HOUSING DEVELOPMENT IN THE PLAN PERIOD The adopted Local Plan (LPP1) requires Ewhurst (village) to make provision for the development of a minimum of 100 new houses up to 2032. Work for the neighbourhood plan prior to the Regulation 14 stage was undertaken to identify and allocate sites to meet this minimum requirement. However during the 5 years this work was underway and before it could be satisfactorily completed, new planning permissions given by Waverley Borough Council and several up-held appeals, resulted in there are being outstanding new housing development commitments for the plan period amounting to at least 115 to 120% of the total requirement in the adopted Local Plan. As the Local Plan determined that it would not represent sustainable for Ewhurst to make provision for a significantly greater number of new houses than the minimum of 100, there is now no need or requirement for this neighbourhood plan to seek to make provision for more new housing development. Waverley Borough Council has already said there is no immediate need or intention on its part to increase the housing provision requirements for the neighbourhood plan area. If and when it is necessary to increase the provision requirements for new housing, that will be Agreed through a revision of the Local Plan. The neighbourhood plan should not attempt to pre-empt revision of the Local Plan. The main outstanding commitments for new housing development which make up 115 to 120% over provision are shown on the following plan. This neighbourhood plan there for makes no more provision in the form of

As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

365.	44	12	Housing Sites Policies	Section 12 should be entirely deleted as one of the policy sections with for there are NO policies in it – neither planning policies nor non-planning policies (Parish Council policies). It is an almost entirely pointless piece of script to include in a neighbourhood plan and is calculated to:- confuse and mislead the community about what the neighbourhood plan can deliver;- create serious problems for the LPA in implementing both the neighbourhood plan and the Local Plan AND most importantly for revising the Local Plan before it has been Agreed.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
366.	44	12	Housing Site Policies	This Section, as a Policy Section, should be entirely DELETED.- It is a poorly justification for the failure of the Neighbourhood Plan Team to produce in time a draft plan which can offer to the community, through consultation, an opportunity to select which potential housing development sites should be allocated to meet LPP1 housing provision requirements.- The section is a calculated attempt to mislead the community about why the plan has taken so long to produce that there is no need now to make any housing allocations.- The failure to produce in 5 years a draft plan which needs allocations for housing is not the fault of developers, the LPA, planning inspectors, the planning system or any other party but the neighbourhood plan team. The failure or fault lies with the team responsible for the housing sections of the plan.- It has taken nearly 5 years to produce a draft plan for regulation 14. Developers have every right to seek planning permission for a site before a plan is produced for regulation 14. They do not have to wait until a neighbourhood plan team has finished its work.- The local planning authority must determine planning applications according to the adopted policy of the time and not a plan or policy which is still to be produced.- Likewise planning inspectors must determine appeals according to policy and plans, local circumstances and government direction which exists at that time.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

367.	44	12	Housing Site Policies	<p>Section 12 – First Paragraph This paragraph is misleading and should be omitted entirely.- The draft Neighbourhood Plan does NOT have a Strategy so how can it have adopted one? (Strategy = an overarching plan to achieve a long term aim...) Most development plans including some neighbourhood plans, do have strategy statement to provide the “direction” for the plan’s policies but the draft E&EGNP does not.- If the reference is meant to mean the approach taken by the Neighbourhood Plan Team why does it not say so?- It could mean the approach taken by some of the neighbourhood team to direct the conclusions of the work in a given direction, for instance to ensure that new development goes to one area as against another. However that as an “approach to assessing potential development sites” is not work based upon sound planning principles for it is not fully objective without inappropriate influence.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
368.	44	12	Housing Site Policies	<p>Section 12: Housing Site Policies – Missing Housing Commitments The following is NOT something to include in those sections of the plan which have policies i.e. Section 5 onwards. It is something the draft plan must include in the preceding sections. The neighbourhood plan should show on a plan the sites with “commitments” (i.e. sites with planning permission which have not started, are under construction and have been already completed within the period of the plan) which make up the area’s housing provision requirements. This must be Agreed in order that:- The community can make sense of the fact that the neighbourhood plan has not made or does not need to make more allocations for housing to meet current requirements;- The LPA and the Examining Planning Inspector can be satisfied that the plan is sound and proper without any more allocations for housing development;- Planning Appeal Inspectors can be assured that the neighbourhood plan should be taken into account as relevant post regulation 14 without any additional allocations for housing development;- The neighbourhood plan can justify and redraw the settlement boundary to include all existing built-up area and the area which will be built-up when commitments are complete. Without a redrawn settlement boundary the LPA and planning inspectors will not be able to make sense of and implement several of the policies in the neighbourhood plan and the existing LPP1.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>

369. 44 12 Housing Site Policies The following statements in Section 12 should be omitted ENTIRELY because they are incorrect and misleading.1. There is no requirement for a plan to try to direct future housing pressures to the most sustainable locations. Government policy and guidance says only that development must be sustainable. There is no requirement to try to assess which site is more sustainable than another for there are no agreed qualitative or quantitative measures for what is more and what is less sustainable. The only requirement is for “sustainable development”.2. The Housing Land Availability Assessment and the Sustainability Appraisal (Strategic Environment (sic) Assessment) is not an essential part of the Neighbourhood Plan. They are NOT the plan. They are at best evidence for the plan and its policies. For clarity many neighbourhood plans include a summary or reworked version of these documents in the information or appendices of a plan, but that still does not make the reports part of the plan. As there is no need for housing allocation policies in the plan and as there are no housing allocations in Section 12, reference to the now abortive work of those two faulty reports should only be made in a section which precedes Section 5.3. A neighbourhood plan should not try to anticipate future development pressures and what additional requirements for providing for more housing development may be placed upon an area by any revision of the Local Plan. The requirements for new housing development and the new for new allocations in any plan do change and it is for the LPA via revision of the Local Plan to determine where these should be located. A neighbourhood plan should not try to pre-empt decisions about such matters by directing attention to any site for it is quite possible that the LPA and Local Plan will decide that no more new housing is required in an area.4. The Shrimplin Brown

As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

370.	44	12	Housing Sites Policies	Intro para first sentence. Comment- Need to correct second line to read 2018 (not 2016) Local Plan. Intro para last sentence Comment - Delete this sentence. It is not factually correct and also misleading. The 2015 Parish Survey did not, in fact, cover identification of most suitable sites, nor indeed ask residents their opinions on site criteria or anything else to do with sites.		Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
371.	44	12	Housing Sites Policies	I would like to be assured that my land to the rear of my house, The Garden House, is included in the plan since whilst the second appeal was rejected the Inspector stated that this piece of land was suitable for residential development. So, I am, personally, working on plans which would find favour with Sayers Croft and other neighbours such that planning permission could be granted at a local level.	Y		As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
372.	44	12	Housing Sites Policies	I have an ongoing concern about properties to the rear of Mapledrakes Rd such as Treetops and Five Oaks Farm joining up developments with the new Fairfax development that will change the shape of the village. I realise the NP cannot stop this process as it still has a way to go before publication. There appears to be widespread land clearance activity happening unchecked currently.		Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

373.	44	12	12.1 Parish Allocation	Presumably this will be updated to reflect the Bulls Head decision and the number of 115 will be changed to 120? The words 'if justified' in the 2nd para should be qualified. Justified by whom – i.e. revisions to the WBC local plan, not by a landowner or developer.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
374.	44	12	12.1 Parish Allocation	Interested to understand why the consultation period is still running but approval has already been granted on at least one of the locations provided in the plan? Construction of the volume covered in the plan will fundamentally change the rural nature of the village, something commented on in virtual every assessment yet planning is being agreed.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

375.	44	12	12.1 Parish Allocation first paragraph	<p>2nd line Comment. Two points of detail - 1) Should the 115 be updated to read 120 given the successful Bulls Head appeal. 2) it should read 'target of minimum 100'.</p>	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
<p>Comment We agree with the first para of 12.1 that there is no necessity to provide for further development and that no site allocations are necessary, now that Ewhurst has fully met its target allocation. BUT we ask that this statement is strengthened beyond simple reference to 'necessity' with an additional sentence along the lines of:- Nor can further development be justified on grounds of either sustainability or housing need or the Local Plan spatial strategy.</p>				<p>Comment: We ask also that the conclusion contained within the first para of 12.1 should be further strengthened and justified by adding the additional paragraphs (in italics) below. Our suggested additions are consistent with correspondence between WBC's Neighbourhood Plan co-ordinator and the Ewhurst NP team (with particular reference to that correspondence dated 9 May 2019).</p>		
<ul style="list-style-type: none"> • Housing development beyond the 120 already built or given planning permission in Ewhurst cannot be justified on any current evidence of housing need in Ewhurst and in Waverley. Current and permitted development in Ewhurst is 20% above the minimum allocation and any proposal to go materially beyond this would need to be justified because of its sustainability implications, given that the allocation in LPP1 took account of where Ewhurst sits in the Waverley settlement hierarchy. 				<ul style="list-style-type: none"> • Waverley has no current plans to change the housing requirement 		

376.	44	12	12.1 Parish Allocation 2nd paragraph	<p>Comment: We cannot support this para and ask that it is deleted. Y</p> <p>There is no justification in the plan for this proposal. And, in our view, nor can a credible evidence- based justification be made for it. In fact there are many reasons to support its deletion - there is no need/requirement to plan for future development; it puts the parish at risk of even greater development; its meaning is not clear and unambiguous; it is not evidence- based; is contrary to the NP's draft Vision & Objectives and Government planning guidance; and also conflicts with certain NP site and housing development criteria. Our detailed justification and explanation of our concerns is here:</p> <ul style="list-style-type: none"> • This second para is about further development beyond what has been so far achieved in line with the Local Plan requirements. For the NP to go beyond that is contrary to the Vision and Objectives of the draft NP (Section 3.3), which state that the plan will provide for the development of sufficient new housing to '1) meet primarily the locally-generated need for houses, including the needs of those who work in the area, and 2) fulfils the requirements of the Local Development Plan.' This objective has been satisfied by the 120 housing numbers already built or planned for, so the draft NP should not now go further than this. Moreover, there is no evidence that the community wants more development than the numbers allocated by Waverley in LPP1. • This 2nd paragraph also fails on Planning Practice Guidance grounds. The Guidance says that planning policies should be evidence-based, and also clear and unambiguous with sufficient clarity that a decision-maker can apply it consistently and with confidence when determining planning applications. 	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
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377.	44	12	12.2 Housing Site Assessment	<p>Comment We challenge the relevance and content of Section 12.2 and suggest it is deleted. We can see no value and purpose for this section. It does not serve as a justification for the proposals in Section 12.1. Perhaps its purpose is to draw attention to the James Garside finding that the conclusions of the HLAA are “thorough and robust”; or to add meat to what is meant by “most sustainable”. The rest is no more than an expanded footnote.</p> <p>Either way, our justification for this challenge is in the following comments:</p> <ul style="list-style-type: none"> • First paragraph second sentence Comment This sentence points to James Garside’s review of the HLAA and his finding that the HLAA conclusions are thorough and robust. But, as Garside himself states, his conclusions are based on the information provided in the HLAA and he acknowledges that “a detailed fact checking exercise has not been undertaken.” The HLAA conclusions can only be as robust as the factual details underpinning them. In January 2019 we provided the Parish Council with an in-depth site by site critique of the details in the HLAA site assessments, identifying specific errors, omissions and inconsistencies in the site data and descriptions. The PC did nothing to verify our critique. With no evidence that Garside’s review took into account the reported flaws in the site details - and without a PC independent review - this “thorough and robust” conclusion is questionable, and cannot carry weight. • Second paragraph Final sentence Comment. This sentence describes what is meant by ‘most sustainable’ in relation to identifying the sites for future development - citing central location, convenient access to key locations in centre of village, relatively modest scale, and site 	Y	<p>As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.</p>
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376.	44	12	12.1 Parish Allocation 2nd paragraph	<ul style="list-style-type: none"> • First paragraph second sentence Comment This sentence points to James Garside’s review of the HLAA and his finding that the HLAA conclusions are thorough and robust. But, as Garside himself states, his conclusions are based on the information provided in the HLAA and he acknowledges that “a detailed fact checking exercise has not been undertaken.” The HLAA conclusions can only be as robust as the factual details underpinning them. In January 2019 we provided the Parish Council with an in-depth site by site critique of the details in the HLAA site assessments, identifying specific errors, omissions and inconsistencies in the site data and descriptions. The PC did nothing to verify our critique. With no evidence that Garside’s review took into account the reported flaws in the site details - and without a PC independent review - this “thorough and robust” conclusion is questionable, and cannot carry weight. 	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
378.	44	12	12.2 Housing Site Assessment	Suggested amendment. Amend to: “In the light of Ewhurst having fully met the minimum target of 100 houses...”	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.
379.	44	12	12.2 Housing Site Assessment	Mention is made of issues with regards to the safety of the road crossing to access Rainbows End but under the Housing Site Assessment Point 12.2 a site at Thornhurst Brook Farm is listed as a possible site for development. I recognise that it has been acknowledged that there is a question mark over access to this site and feel that this question mark should be emphasised as the proposed access on to The Street is exactly at the point where it has been recognised that there is already a safety issue.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

380. 44 12

12.2 Housing Site Assessment

• The 2nd para of page 44 refers to 'valuable reference material for the future , identifying sites which meet the criteria set by the Parish Council and are considered to be the most sustainable'. I have to disagree with this on a number of points that I set out below. Once again there are several important conflicts and inconsistencies between the NP and its policies, the HLAA and the SA I do not agree with the argument that suggests these are valuable reference material for the future as if that implies they could be dusted off and picked up from where they are. If or when the pressure comes for E & EG to allocate more than 120 houses, given 100 was a minimum target to 2032, there is all likelihood that the availability of the 'preferred' sites will have altered. Owners may have changed, other events may have overtaken their desire for development, or other sites not named so far may become available. An expectation that these sites will sit as they are for years waiting for development permission is false. At the very least if the Parish Council feel they must include the current HLAA alongside the NP , which I challenge given the numbers already reached, it should be accepted and stated in the NP that an updated and refreshed HLAA would be needed should the Council be required to respond to an increase in housing numbers imposed on them. · There is huge risk that naming these preferred sites by including the HLAA as it stands is an open invitation to developers to try their luck. This is even more so if these are considered to be sites that would be hardest to defend, in which case why advertise them when there is no need at this time?

As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

381. 44 12 12.2 Housing Site Assessment Representation to the Ewhurst And Ellen’s Green Neighbourhood Plan – Regulation 14 Consultation - Land at Thornhurst, Ewhurst (Circa 25 Dwelling Proposal)

1. Introduction

1.1. On behalf of Reside Developments Ltd (‘Reside’) we submit this representation to the Regulation 14 consultation of the Ewhurst and Ellen’s Green Neighbourhood Plan (EEGNP). Reside are promoting Land at Thornhurst, Ewhurst for residential development. The land is immediately west of the Ewhurst Village Hall, accessed from The Mount B2127. Reside object to the Neighbourhood Plan on the basis of:

- Lack of conformity with Local Plan Part 1 (LPP1) with respect of the EEGNP fails to make housing allocations, thus is not positively and proactively prepared; and
- In addition, and as a consequence, the EEGNP fails to address any changing circumstances of planning, and hence does not actively promote sustainable and well-planned development. The EEGNP will therefore not be responsive to change, nor direct development to achieve the best and most sustainable outcomes.

1.2. These three issues form the substance of our representation.

1.3. Reside will, in time, produce further technical evidence to demonstrate site suitability and deliverability. This will need to be read in addition to this representation.

1.4. The change required to the EEGNP is to include Land at Thornhurst as a development allocation.

2. The Site and Promotion

As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out. The text has been amended to make this clear and most of this section of the plan has been deleted or merged with the introduction to set out the factual position.

382.	45	13	Financial Contributions	We are pleased to see that EEG Parish Council have given some thought about CIL within the EEG NP. The CIL Regulations set out how Neighbourhood CIL must be spent. Ultimately, it will be for the Town/Parish Council itself to be satisfied that all Neighbourhood CIL expenditure either supports the development of its area or addresses the demands that development places on the area, in accordance with the CIL Regulations. We would urge you to consider the limits of the CIL Regulations when devising a list of projects. We would recommend any projects detailed gains the support of the relevant statutory bodies or landowner prior to its development/introduction (e.g. WBC, SCC, NHS etc.).We are more than happy to discuss the expenditure of CIL funds with EEG Parish Council, and as early discussions will ensure that projects are in line with the Regulations and will also allow other funding sources to be explored (including any Strategic CIL funding managed by the Borough Council).	Y	Noted
382.	45	13	Financial Contributions	We would also refer you to the documents we recently issued 'CIL: Guidance for Town and Parish Council' for further information.	Y	See column M
382.	45	13	Financial Contributions	For clarity, we would also suggest that you include the commonly used abbreviation of the Community Infrastructure Levy, CIL, within the text.	Y	Agreed
383.	45	13	Financial Contributions	This is not inappropriate and in general is supported. However it is lightweight and not fully justified.	Y	Noted
383.	45	13	Financial Contributions	- The draft neighbourhood plan when it gets submitted cannot include requests for the community to contribute ideas to be included in plan. Requests like that ought to have been made in the consultation documents circulated to all the community. Moreover the request for projects should have also asked the community to justify why their project should be included in the plan.	Y	Agreed. However, there will be ongoing communication and discussion with the community about how developer contributions are spent and where the infrastructure priorities are. This is just the start.
383.	45	13	Financial Contributions	- The 6 projects identified need to be justified, if not in this section but in the appropriate policy section. It is not that the projects cannot be justified. But as they stand, the LPA will find it difficult to justify seeking contributions for such vaguely framed projects if they are to be sought via Section 106.	Y	Some further detail has been added
383.	45	13	Financial Contributions	- Even if the projects are to be "paid" for from a Community Infrastructure Fund for the Parish, it is still desirable if not necessary for the Parish Council to justify them in the plan. The Parish Council cannot use money in a parish fund for projects if it is not prepared to say what they are and why they are necessary.	Y	Some further detail has been added

383.	45	13	Financial Contributions	- Traffic calming investment. This needs to be more specific and justified in relation to the why and where new development must make a contribution.	Y	Some further detail has been added
383.	45	13	Financial Contributions	- Up-grade and extension of village hall. Again needs to be more specific and justified and stated as a Parish Council policy, See another consultation response which deals with this.	Y	Some further detail has been added
383.	45	13	Financial Contributions	- Car parks (including land). Again why and where are these needed? What car park projects are envisaged? How are these related to and justified by new development and what is meant by "including land"? If they are new car parks or even extensions they are almost certainly development which requires planning permission so they should be identified as a proposal for (car park) development in the neighbourhood plan.	Y	Some further detail has been added
383.	45	13	Financial Contributions	- Footpaths and cycleways (including land). As before. Why? Where? How is this related to new development? Again "Including land"?	Y	Some further detail has been added
383.	45	13	Financial Contributions	- Green infrastructure and green networks. What is meant by this as a project? Where would this project be? Can it be justified? It could be a good idea for a project, but there needs to be more in the plan in order to seek contributions.	Y	Some further detail has been added
383.	45	13	Financial Contributions	- Tree and woodland planting. Again a good idea which can be justified. (See another consultation response). However more needs to be said in this section to justify contributions.	Y	Some further detail has been added
384.	45	13	Financial Contributions	"Traffic calming investment." Surely this is Surrey County Council's concern? p45 "Financial contributions"	Y	The Parish may choose to use its own CIL money to supplement any scheme being considered by Surrey County Council.

384.	45	13	Financial Contributions	<p>This section appears to have been rushed. An explanation of s.106 would be beneficial. The bullet points in the list should be fleshed out into complete and concrete proposals. The mentions of "Green infrastructure, green networks" and "Tree and woodland planting" deserve their own section and policies in Section 7. In addition, specific commitments to habitat creations, "net positive" biodiversity for development, community renewable energy schemes, solar panels, heat pumps, battery storage, Passivhaus insulation standards could all be added and fleshed out. WBC are due to decide on declaring a Climate Emergency, following the example of many other local councils</p> <p>https://modgov.waverley.gov.uk/ielssueDetails.aspx?IId=20550&PlanId=0&Opt=3#AI20729 This NP currently says nothing about those issues, despite running to 2032 - two years after WBC is aiming to become carbon neutral. This all needs to be considered and included in the NP</p>	Y	Some further detail has been added
385.	45	13	Financial Contributions	<p>Comment. We cannot understand why this section is part of the draft NP. As drafted it is a wish list with no worked up project proposals on priorities costings, locations, time scale etc. Parishioners should not be asked to sign up to an unjustified list of projects for the use of CIL money and suggest more ideas for the wish list.</p>	Y	Agreed. However, there will be ongoing communication and discussion with the community about how developer contributions are spent and where the infrastructure priorities are. This is just the start.
385.	45	13	Financial Contributions	<p>We suggest that the parish council carries out a separate public consultation on potential CIL projects. In doing so, the projects need to be justified, specific and costed - e.g. where and what sort of traffic calming projects, where new car parks are planned, details of upgrades/extension to village hall etc. - each with estimates of the costs. Only then will residents be in a position to contribute their views on CIL projects.</p>	Y	Agreed. However, there will be ongoing communication and discussion with the community about how developer contributions are spent and where the infrastructure priorities are. This is just the start.
386.	45	13	Financial Contributions	<p>My only reservation is the section 13 on Financial Contribution. Spending money on urban traffic calming conflicts with the stated aim of maintaining the rural feel and character of Ewhurst. Parked cars provide natural traffic calming in a way sympathetic to a rural area and unsightly traffic humps, chicanes and signage jar with the rural feel. Money from development is better spent in the other areas listed.</p>	Y	Agreed, more detail has been added. At the moment the project is only at an initial stage and far more work is required to bring it forward. This would involve consultation with the community.
387.	45	13	Financial Contributions	<p>Uses of the Community Infrastructure Levy should include contributions to the development of educational facilities within the village including pre-school, infant provision and the development of full-scale primary provision should the need arise. This will reduce the potential for village children being 'frozen out' of primary schools in Cranleigh as places there come under pressure from the additional housing both under construction and planned.</p>	Y	Noted - Both Waverley Borough and Surrey County Council also received developer contributions which can be used for the provision of school places. The money received by the Parish could be used for this but is more normally used for very local projects.

388.	45	13	Financial Contributions	Upgrade and extension to the Village Hall is mentioned. On the existing site there is insufficient space to do much in the way of extension as the Hall and Rainbows End garden currently fill the available space. I know that this has been looked at in the past and I appreciate that to find a suitable site would be very difficult but could some consideration again be given to investigating the possibility of building a new Village Hall on an alternative site?	Y	SEE COLUMN M
389.	46	14	Our Future	This section belatedly says and recognises some of the things which should have been said elsewhere in the plan. It appears to be a sort of implementation statement. However some of the things which it says, like “meeting Surrey County Council highways requirements” and “meeting the NPPF presumption in favour of sustainable development” should have been said earlier for several policies.	Y	Noted
389.	46	14	Our Future	Moreover it fails to make clear that responsibility for implementing most if not all planning policies in a neighbourhood plan as part of a statutory development plan lies with the local planning authority i.e. Waverley Borough Council. The LPA can only enforce those policies which come within its planning powers and which are properly justified in planning terms.	Y	Noted
389.	46	14	Our Future	Finally the statement “The Neighbourhood Plan delivers any future housing requirements set by the Waverley Borough Council Local Plan” is incorrect and misleading to the community. The future housing requirements of LPP1 have already been delivered by planning permissions already given. In fact newly built housing, housing under construction and outstanding commitments for new housing will deliver 115 to 125% of the total requirement of LPP1. A Neighbourhood Plan cannot and should not try to deliver unknown future requirements. Setting future requirements for housing in any area is the responsibility of the LPA responsible for preparing the statutory development plan for its area. A neighbourhood plan cannot and should not try to dictate what the LPA sets as future requirements for the LPA may determine that: - There is no requirement for more housing development in the neighbourhood plan area; or - The scale of future housing requirements in the plan area which can be sustainably accommodated are different to those anticipated by the current neighbourhood plan.	Y	As of 1 April 2019, the Parish has 124 commitments (housing completions and permissions) which surpasses the minimum 100 dwelling requirement set by Waverley Borough Council in Local Plan Part 1. Therefore, following the response from Waverley Borough Council to the consultation on the EEG NDPD, no specific sites for housing have been allocated within the EEG NDP. However, any planning permissions already granted will continue to be built out.
390.	47	14	Our Future	Suggested Amendment. Amend ‘Parish Plan’ to ‘Neighbourhood Plan’.	Y	Agreed

391.	47	14	Our Future	"Our future" "it is clearly evident that work remains to be Agreed to follow up the recommendations made within the Parish Plan" and "but others ... are only partially addressed" - again, the NP is not a newspaper. It is a planning document. It should avoid making reference to specific points in time. The entire second paragraph of this section is unnecessary and should be removed.		Y	SEE COLUMN M
391.	47	14	Our Future	"The Neighbourhood Plan delivers any future housing requirements set by the Waverley Borough Council Local Plan" change to "The Neighbourhood Plan accommodates and enhances the Waverley Borough Council Local Plan"		Y	SEE COLUMN M
391.	47	14	Our Future	"Meeting the National Planning Policy Framework presumption in favour of sustainable development in the context of the rural nature of Ewhurst and Ellens Green." change to "Meeting the policies laid out in the National Planning Policy Framework presumption, within the specific context and rural nature of Ewhurst and Ellens Green."		Y	SEE COLUMN M
392.	47	14	Future Housing	The Neighbourhood Plan should focus on the minimum housing requirement stated by the current Local Plan. It is not possible to consider any future housing requirements set by the Local Plan. If changes to the Local Plan occur it may be that these would be addressed by a revision to the EEG NP.	Y		Agreed
393.	47	14	SCC Highways	We are unsure what is meant by the statement: "Meeting SCC Highways requirements", clarity is required.		Y	See Column M
394.	46	14	Our Village	Image – the future will look very different		Y	Noted
395.	48	15	Annex	Site Assessment Criteria – see previous comments.		Y	The EEG NP is not allocating land for development therefore to avoid confusion this Annex has been removed.
395.	48	15	Annex	It says details contained at Annex A, but this is Annex A!		Y	The EEG NP is not allocating land for development therefore to avoid confusion this Annex has been removed.
396.	48	15	Annex	"emerging local policies" Remove the word "emerging"		Y	The EEG NP is not allocating land for development therefore to avoid confusion this Annex has been removed.

397. 49 15 Annex

"Sites which are not contiguous with the settlement boundary (next to) may be appropriate for development in exceptional circumstances where clear benefits have been evidenced (such as brownfield sites) that align with national and local policy."

This appears to describe the sites at 15 and 16 in the SB report and yet they were not recommended. This paragraph would play into developers hands in those cases.

"Sites in excess of 4 acres (1.6 hectares) are unlikely to be acceptable." What are we doing to guard against split sites like those at Cox Green? Or Backward Point?

"Deliverability. Sufficient evidence must be provided to demonstrate deliverability and that the land is free from legal restrictions or covenants which may prevent development." This is an assessment criteria, yet the HLAA and SEA made no effort to assess this with regards to checking existing covenants.

The EEG NP is not allocating land for development therefore to avoid confusion this Annex has been removed.