

## **Comments on the Ewhurst and Ellen's Green draft Neighbourhood Plan**

**21 January 2021**

We have reviewed the policies included in the July 2019 version of the Plan that was consulted on at Regulation 14 and considered these in light of the comments received from consultees, the health check undertaken by the SDNPA, and comments on the emerging draft from the Steering Group.

The Regulation 14 process was undertaken correctly but depending on the scope of changes to the draft plan, this may need to be re-run. For instance, if you were to include Local Green Space designations or other matters that change significantly the content.

We have put together an updated template for the Plan which, once we have discussed and agreed the scope of the policies, we can start to populate and share with you.

The table below reviews the existing policies – including those noted by the group as being for deletion - and suggests potential areas for consideration of additional policies.

Waverley Local Plan Part 2 is being consulted on at the moment and will be adopted before this NP so it will need to be reflected.

Policy	Intent at the moment	Comments
<b>Community Facilities, Assets and Services</b>		
<b>C1: Assets of Community Value</b>	To support proposals that affect ACVs will not be supported where they would be detrimental to the provision of community benefits.	<p>LP Policy ICS1 (p.62) sets out that:</p> <ul style="list-style-type: none"> <li>• the loss of key services and facilities will be resisted unless an appropriate alternative is provided or, evidence presented demonstrating that the facility is no longer required and that suitable alternative uses have been considered; and</li> <li>• provision of new ones supported.</li> </ul> <p>Policy LRC1 (p.108) similarly supports the retention of existing sports and recreational facilities and encourages new ones.</p> <p>We consider that the NP policy adds additional local detail to these, by seeking to protect, in particular the ACVs.</p> <p>Are there other specific local facilities that are not ACVs that also should be protected? These could be named in the policy and you could also include a separate 'non-policy' action to explore nominating these as ACVs, if there is an interest/need to do so locally.</p> <p>Equally, are there specific local facilities that are needed locally? Or are there existing facilities that could be improved or expanded?</p>

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<p><b>C2: Recreational Facilities and Open Spaces for Community Use</b></p>	<p>The parish has lots of recreational and sporting facilities.</p>	<p>As above, Policy LRC1 (p.108) supports the retention of existing sports and recreational facilities and encourages new ones. What is your policy seeking to achieve above and beyond that? As above, are there specific improvements you'd be seeking to existing facilities. Is additional car parking needed?</p> <p>Clause c of this policy relates to the footpath network and this would be better placed in the transport section, as part of your Policy T1. That policy should then be expanded to say where the current network should be enhanced, supported by a map. Are there footpaths that, with improvement, could provide better 'practical' routes rather than just routes for leisure walks in the countryside?</p>
<p><b>Education section</b></p>	<p>The NP notes that Rainbow's End pre-school is at capacity and unable to cope with increased pupil numbers.</p>	<p>Surrey County Council (SCC), as the Local Education Authority, is responsible for planning to deliver sufficient education places across the county. Therefore it would fall outside the remit of the NP.</p> <p>Another Surrey NP does include:</p> <p>"Development proposals which facilitate and enhance existing [nursery] schools and associated playing fields, as defined on the Policies Map, will be supported subject to demonstration that: a. acceptable mitigation measures are offered to overcome access and unacceptable highway impact caused by the development; b. the development would not result in a significant loss of amenity to local residents or other nearby activities; and c. the development does not conflict with other Plan policies or proposals."</p> <p>However, we consider that this is a strategic matter best dealt with through the Local Plan and ICS1 would be the LP policy to do this.</p>
<p><b>Potential other areas to consider</b></p>	<p><b>Allotments/ growing spaces</b> – do you have any and would you wish to promote new ones? We could help you to include such a policy.</p>	

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<b>Countryside and Environment Policies</b>		
<b>Former E1: Coalescence (proposed for deletion)</b>	This policy intended to identify a Local Gap	<p>WBC have suggested that further evidence would be required to justify such an approach.</p> <p>The Local Plan proposals map in the folder shows that a significant proportion of the gap between Ewhurst and Cranleigh is the Area of Great Landscape Value (AGLV) and is a Site of Nature Conservation Interest (SNCI)/ancient woodland. We do not think that any NP policy will provide stronger protection than that provided by national policy (ancient woodland) or Local Plan policies RE3 (AGLV) and NE1 (SNCI).</p> <p>If you wished, however, to pursue this, the SDNPA healthcheck provides the criteria that you would need to assemble to be able to justify a gap policy. We would recommend that you commission an expert report from landscape consultants to do this.</p> <p>But bear in mind that a gap policy is not a 'block' on development and it would be better to include other policies which preserve what is special – some of these are set out further down in the table in 'Other areas to consider'.</p>
<b>E2 Green space and landscaping</b>	States that WBC requirements for major development should be followed and asks for certain details to be provided: landscape and impact assessment; tree survey; landscaping strategy; and inclusion of green space	We consider that the policy would be better expressed as a more overarching Design policy which, subject to scale, nature and location, would also be helpful for considering proposals relating to smaller scale sites such as infill or extensions.
<b>Other areas to consider</b>	<b>Designating Local Green Spaces</b> – Are there any green spaces within the settlements that could be justified as being 'demonstrably special to the local community'. The NP provides an opportunity to identify and safeguard these from inappropriate development. LPP2 will include a policy on these and seeks to designate 18 across the borough, although none of these are in your parish. Therefore it is something to consider as part of the NP and we can assist you in identifying them and justifying them.	

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	<p><b>Locally significant views</b> – There is also an opportunity to consider if there are any local views/viewpoints that should be protected from detrimental impacts of development. They need to be special in that they offer a view of something that epitomises the character or history of the area; maybe takes in a specific important heritage asset or protected landscape. Each view would need to be photographed, mapped and justified. The Conservation Area Appraisals contain some ideas, which we could include.</p> <p><b>Green Infrastructure</b> – Many NPs include a policy mapping out their GI network showing the corridors of green space and ‘stepping stones’ of particular habitats, so that this can be considered within any proposals. Are there areas where linkages could be improved? Consideration of the ASV to be included here.</p> <p><b>Local habitats and species</b> – Many NPs also consider how to protect ‘unprotected’ features of their landscape and the policy would include support for a net gain in biodiversity where development takes place. This might be somewhere to incorporate your green space and landscaping requirements (E2).</p> <p><b>Flooding</b> – this is mentioned in your objectives. What is causing the flooding and is it also about drainage? (see also comments against U1)</p>	
<p><b>Conservation Areas and historic environment</b></p>	<p>No policies</p>	<p>There is a lot of interesting information here, but no policies. You do include the idea of creating a new Conservation Area (Sayers Croft) – unfortunately the NP is not the mechanism for designating Conservation Areas, however, you could consider include a policy on Local Character – perhaps identifying Sayers Croft as a ‘Local Character Area and defining what that means (descriptions and photos), with an associated action to pursue upgrading it to a CA in the future.</p> <p><b>Character / design policy</b> could reinforce the content of the Conservation Area Appraisals in terms of what should be considered within any proposals to ensure that they contribute to the character of the Conservation Areas. You could define Sayers Croft as a Local Character Area, as mentioned above. It could also draw on elements of your existing Village Design Statement, although this is not particularly detailed.</p> <p><b>Non-designated heritage assets (NDHA)</b> – are there any buildings or structures in the parish that are neither nationally nor locally listed but which are</p>

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		<p>considered to contribute to the sense of place and character? A good starting point is the Heritage Gateway listings, which is operated by Historic England. Do you have any heritage assets at risk? Local Plan Part 2 Policy DM23 seeks to protect such assets and you could either include a policy in your NP setting these out, or assemble a list of such assets and provide that to WBC, using their policy to protect them. Either way, we'd need to confirm what WBC's criteria are for NDHAs and ensure that you have the necessary evidence.</p>
<b>Local Economy and Employment</b>		
<b>L1</b>	<p>Supports proposals that utilise brownfield sites and various other criteria.</p>	<p>On your current policy specifically, LP Policy EE1 already supports the provision of new employment – and includes a clause on the diversification of agricultural buildings, if that is of interest (so no need to repeat that). EE2 protects existing employment sites.</p> <p>Your clause (a) relating to brownfield is already picked up at a national level but could be included in an overarching spatial policy – do you have many brownfield sites? If not, then it will be difficult to have a locally-specific brownfield site policy.</p> <p>Your clauses (b) and (c) could be picked up in the design policy or in one of the environmental/transport policies.</p> <p>Your clause (d) would be moved into the Character/Heritage policy in the section above.</p> <p><i>LP TCS3: The Council will support the provision of small-scale local facilities to meet local needs. Where planning permission or prior approval is required, the Council will resist the loss of shops and services which are deemed to be important to the community. Proposals for the loss of shops will need to demonstrate that continuing in this use is unviable. The Council will respond positively to proposals for alterations to or the extension of shops which are designed to improve their viability but do not result in their loss or change of use. This would appear to negate the need for a specific policy on retail/community uses (Use class E).</i></p>

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		I don't think the policies in this section add to the LP, so could delete.
<b>Former policies U1 and U2 (proposed for deletion)</b>		We agree that these are not required as they are dealt with at the strategic level.
<b>New U1 (formerly U3) Water Supply and Sewerage Infrastructure</b>	Seeks to ensure that adequate water supply and sewerage infrastructure capacity is in place	Flooding falls normally within the remit of the County Council and the Environment Agency, however there are many examples of NPs which include flood-related policies. We can assist in recasting this, including mapping the problem and would need evidence of local problems that have occurred.
<b>Traffic and Transport</b>		
<b>T1: Sustainable Travel Choices</b>	Supports improvements to enable more walking, cycling and public transport	This would benefit from being shown on a map in terms of where enhancements mentioned should be made and where new linkages are best placed. Perhaps include 'subject to scale, nature and location' of the proposal.  Are there locations in the village where you would support electric charging points or cycle storage? As noted previously, this policy should then be expanded to say where the current network should be enhanced, supported by a map. Are there footpaths that, with improvement, could provide better 'practical' routes rather than just routes for leisure walks in the countryside?
<b>T2: Quiet Lanes (suggested for deletion)</b>	Suggested the designation of particular roads as 'quiet lanes'	This falls beyond the remit of the NP, but could be included in the 'non-policy actions'.
<b>T3: Residential Car spaces (suggested for deletion)</b>	Sought to set minimum standards for off-street car parking.	Local Plan Part 2 policy DM9 says that development should meet the Council's parking standards which are provided by the SCC Parking Guidance 2018. You would therefore need very strong evidence as to why you should depart from this. In addition, you have met your housing requirements so are unlikely to see much by way of major development.
<b>T4: Traffic Calming</b>	Supports measures that control and limit the volume and speed of traffic through various locations	Controlling of speed and volume is outside the remit of planning, being an enforcement / highways matter.
<b>T5: Heavy Goods Traffic</b>	Does not support proposals that would generate HGV traffic, which would harm character and amenity.	This is not a policy matter, rather it is a highways matter relating to weight limits on certain routes and enforcement of those routes.

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<b>Housing</b>		
<b>H1</b>		Did an H1 exist at some point?
<b>H2: Affordable Housing (proposed for deletion)</b>	Sought to deviate from the 30% ah required in LPP1, moving it to 40%.	Agree to delete as this would not be in conformity with the strategic policy.
<b>H3: Size of Homes</b>	Sets out the % mix of different sizes of homes based on findings from the 2015 parish survey, in order to enable more starter and downsizer homes.	<p>The percentages quoted in your NP – notwithstanding that they do not add up to 100% - are very similar to those in Local Plan Part 1 Policy AHN3. That Local Plan policy also identifies a specific need for housing for older people (downsizers).</p> <p>Therefore, we consider that you could redraft this policy to reinforce support for these aspects of AHN3, adding that homes should also provide for the needs of first-time buyers.</p> <p>Trying to justify a minor variation on the percentage split of homes will be very hard to justify, particularly against a backdrop of there being very little growth in the area.</p>
<b>H4: Infill and Windfall Housing (proposed for deletion)</b>	Sought to place additional criteria on windfall development (e.g. not being backland)	The feedback considered that this adds additional layer of complexity and crosses into Rural Exception Sites (which is already dealt with in LP Policy AHN12).
<b>H5: Density (suggested for deletion)</b>	Sought to ensure that proposals consider existing density	This could be included within the Design Policy suggested above in this table, but given that you are anticipating very little growth, it may not be relevant.

