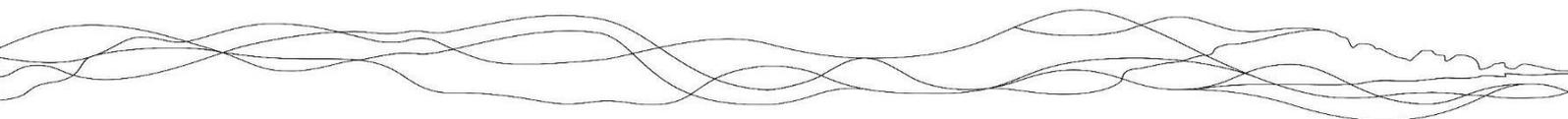


# **Review of Ewhurst and Ellen's Green Neighbourhood Plan 2019 - 2032**

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**January 2020**



# I. INTRODUCTION

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- 1.1 This report presents the findings of the review of the Ewhurst and Ellen's Green Neighbourhood Development Plan (EEG NP) which was consulted on at Regulation 14 stage in the summer of 2019. It identifies where there are potential gaps in the policies; where redrafting/restructuring of text and policies is required; and, where additional information or clarification needs to be obtained from Waverley Borough Council (WBC).

## 2. BRIEF OVERVIEW OF WHAT THE NDP SEEKS TO ACHIEVE

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- 2.1 Our understanding from reading the policies and objectives in the plan is that the EEG NP is not proposing the allocation of land for any forms of development, given that current housing commitments surpass the minimum dwelling requirement set by Waverley Borough Council. The Plan is also seeking to ensure that the landscape and heritage features that give the parish its rural character and appearance are conserved with a particular emphasis on retaining the separation between Ewhurst and Cranleigh. There are also a variety of issues and concerns raised in relation to the capacity of infrastructure within the Parish.

## 3. GENERAL COMMENTS

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- 3.1 We can see that the Parish Council has put in a lot of work and effort to get the plan to this current stage. The NDP is an appropriate length and is, in general, clearly written. In some cases it would benefit from greater use of plain English and more data or detail specific to the Parish would add greater local flavour.
- 3.2 **Policy Gaps:** From the review work we have carried out, we do not think there are any significant gaps in the evidence base or any large areas of new work that must be carried out before it can be submitted to Waverley Borough Council. However, there are a couple of policies that should be deleted and there are missed opportunities to make the plan more locally specific. In many cases it re-iterates the policies within the Waverley Local Plan which adds little and can result in confusion and contradiction.
- 3.3 **Housing Allocations:** It is clear that recent housing developments, both completed and planned for, have led to concern and upset within the Parish. We can see limited evidence to support development levels that go further beyond the levels planned for in the Waverley Local Plan at this stage and therefore we would recommend that the allocation of further sites for development does not take place through this EEG NDP. The work done to assess sites and their potential can be archived for potential future revisions of the plan or a review of the Waverley Local Plan. Any reference to the work done to support the current NDP should be carefully scripted to ensure that your position (as supported by Waverley BC) is very clear and not open to interpretation. As written, the inclusion of a Housing Site Policies section and pages 10 – 12 on the site selection work is confusing. The removal of much of this text

will reduce the uncertainty and resolve many of the objections to the plan. There are many examples of plans that do not allocate sites and their focus can be on design, heritage, protection of community facilities, etc.

- 3.4 Plan Objectives:** Having considered the evidence (which is summarised in Section 4 and the community feedback), the writers have not then managed to clearly drawn out the key issues (other than in relation to housing). In addition to this, a series of Objectives are set out in Section 3, but how do they relate to the evidence and more importantly it is not clear how the plan is seeking to address them. There are no ties between the policies and the objectives and at all stages we recommend that you should be asking yourself ‘How does this policy help to meet Objective x, y, z ..... Etc’. A simple example: Objective 3 relates to the built environment, the goal is to maintain and enhance the character and built environment of the Parish, but there is only a very brief design policy within the plan.
- 3.5 Locally Specific:** In terms of more local matters that can be addressed through the EEG NP, we draw to your attention your ability to identify non-designated heritage assets, designate Local Green Spaces, allocate land for community facilities (if there is an identified need), safeguard important views and set out more detailed local design policies. Not all of these may be appropriate in your circumstances but we suggest them as a way of making your plan more locally specific. However, the introduction of new policies is likely to lead to a need for further consultation and you should discuss this with Officers at WBC before progressing.
- 3.6 Layout:** In terms of the layout and structure of the NDP, one respondent has suggested ordering the policies in the same manner as the objectives, or visa versa. We would concur with that. There are clearly also issues with the maps, many of which are not clear or contain too much information, which must be resolved and would deal with many of the objections you have received.
- 3.7** The detailed analysis of objectives and policies is provided below together with suggested further possible actions. In all of our comments we have started from the position that the plan will not be allocating sites for development. In addition, having considered the representation from WBC in detail, we would agree with most the points that they raise which must be addressed before you submit the plan. As a result, rather than provide additional recommendations or comments, on these occasions we have taken our recommendation directly from their response. Finally we have put in links to the Hook Neighbourhood Plan, Thrupton Neighbourhood Plan and South Downs Local Plan where we think there are examples within them you could draw from.

## 4. DETAILED ANALYSIS

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Section	Comments	Action / questions
<b>General</b>	Paragraph numbers should be included throughout the plan. It enables people to comment more easily and makes the Examination simpler.	

Within the policies, sentences such as ‘*Subject to compliance with other policies,.....*’ should be removed. It is a given that the plan must be read as a whole and in conjunction with other plans. There is a risk that this kind of wording is included in some policies and not others, giving the wrong impression that some are more important than others.

Update all references to NPPF to refer to 2019 version (check paragraphs are still correct, if referred to).

<b>Foreword</b>	This will need to be re-drafted to reflect the next stage in the plan making process, but is it actually necessary at all? Consider whether it is adding anything to the plan or could these matters be put in a covering letter to residents?
<b>Executive Summary</b>	We would recommend that this section is removed and the relevant text merged into the ‘Introduction & Background Section’. It is very difficult to write a summary of a policy document and inevitably themes are not covered fully or when summarised give a slightly different message which can lead to confusion or misinterpretation. The summary serves no real purpose and will not be used in the determination of planning applications.
<b>Next Steps</b>	Suggest moving this to after the Introduction and Background ( <i>which, if you deleted the Foreword and Executive Summary would be the first section of your plan</i> ). Update it to reflect the current stage.
<b>Section 1: Introduction and Background</b>	You could consider including a paragraph at the beginning here describing the Parish and its character. This text could be taken from the Foreword or similar.
<b>Section 2: Neighbourhood Plan Preparation Process</b>	<p>Detailed information on the preparation of the plan, including all the stages of consultation and how this has informed the plan should be included in a Consultation Statement which needs to accompany the Submission version of your Plan. This section can therefore be shortened (flow charts removed) to set out just the key stages. The Community Engagement section feels appropriate, subject to the minor changes as set out in the representations and the inclusion of links to where the surveys referred to etc can be found.</p> <p>There is some disquiet about the consultation that has taken place, this can be common place where plans take a long time to produce. Some of the early information is now 6 years old. The preparation of the Consultation Statement will give you the chance to log everything. In particular the representations from this Regulation 14 consultation should be summarised into key topics / themes and most importantly you should set out in broad terms how they have influenced the plan.</p> <p><b>Evidence base</b> – This summary focuses on housing site identification and assessment. As the plan is not allocating sites, this emphasis is skewed. Any reference to the development sites evidence should be considerably shortened to just the basics to avoid confusion and placing emphasis on</p>

	<p>something that has only limited relevance now. You could consider merging this with Section 4: Ewhurst Today.</p>
<p><b>Section 3: Vision and Objectives</b></p>	<p>As noted by some of the respondents, some of the aims and objectives do not read as such. This needs to be amended and many of the respondents make sensible suggestions which could be incorporated. In addition the first ones relating to housing must to be reconsidered as the plan is not allocating land for development. For example Goal 1a could be amended to read ‘To accommodate planned levels of new housing’ – the aims would then link to ensuring development is well designed, integrates with the community and it supported by sufficient infrastructure etc</p>
<p><b>Section 4: Ewhurst Today</b></p>	<p>We suggest this should be titled ‘Ewhurst &amp; Ellen’s Green Today’ or ‘The Parish Today’ etc. It should conclude with a short summary of what the key issues are within the Parish. These key issues should tie in with the objectives of the plan (set out in the previous section).</p> <p>Clearer / larger maps are needed and, with the exception of the settlement boundary one, must cover the entire Parish. Alternatively, replace all the small maps with a much larger consolidated map showing all the designations together. Combining the community assets map with the flood zones is an awkward combination and the identified community assets need to be linked to a planning policy in the NDP setting out what policies apply to such locations. Justification also needs to be provided as to how and why they were identified.</p> <p>Amending the settlement boundary – You need to be clear as to whether you are proposing to amend the settlement boundary or not. If you are, then as suggested by Waverley Borough Council a before (2002 boundary) and after map would help people to see where changes are being made. It is also important to be clear about the criteria you have used when making those changes – we would suggest you make changes only where there is planned development (i.e. it has planning permission but has not commenced), it is under construction or is completed and relates well to the current settlement boundary. We would recommend that you prepare a supporting document (a reference to which is included in the plan) which sets out the purpose of the boundary review (i.e. to rectify current anomalies where new development is to, or has, taken place), the criteria and the reasoning behind each proposed change. All of this should be clearly labelled and shown on maps.</p> <p>You may therefore also wish to state that the settlement boundary may be further refined by Waverley Borough Council through their work on the emerging Local Plan Part 2, to ensure that your village boundary remains consistent with others within the District.</p>
<p><b>All Policy Sections</b></p>	<p>Each section would be enhanced by the inclusion as part of the introduction to the relevant objectives for this topic area.</p>

<p><b>Section 6: Community Facilities, Assets and services</b></p>	<p>General Comments: You state that the Community facilities and Assets report identifies a need for new provision, but this plan offers no solutions. Is the evidence correct? Do certain facilities need to have increased capacity? Is there a need for bigger play areas / recreation grounds etc? Is there a need for a whole new facility or is it about making more efficient use of what you already have? Having said this in the plan it would be good to have an idea about what the solutions may be. This will help you in responding so some of the representations.</p>
<p><b>EEG C1: Assets of Community Value</b></p>	<p>The policy does not cover assets of Community Value, it covers all community facilities. This matter is also covered in EEG C2</p> <p>Either:</p> <ol style="list-style-type: none"> <li>1) Merge the two policies; or,</li> <li>2) Put a policy in specifically relating to the ACV – something along the lines of <i>‘Planning permission for proposals that support and safeguard the community benefits afforded a Registered ACV will be permitted. Proposals that have an adverse impact on them will not be supported.’</i></li> </ol>
<p><b>EEG C3: Community Facilities</b></p>	<p>What is this policy adding to that which is already in the Waverley Local Plan? To avoid confusion it may be better to delete it and refer people to what already exists unless you can justify a different approach.</p>
<p><b>6.3 Education</b></p>	<p>The plan identifies a range of issues or concerns but does not make any suggestions as to how they can be overcome. Have you spoken to Surrey County Council or the school about what their plans are to accommodate the extra children generated from the permissions given? Can the Pre-School expand? Should you prioritise the use of any CIL funds you get or S106 monies to resolve the parking issues and if so, can more detail be put in Section 13: Financial Contributions?</p>
<p><b>Section 7: Countryside and Environment Policies</b></p>	<p>7.1 - The plan would be enhanced by the addition of a summary of the key characteristics of each landscape character areas within the Parish rather than just a reference to it.</p>
<p><b>EEG E1: Coalescence</b></p>	<p>Three terms are used in respect to this policy; ‘Area of Separation’, ‘Local Gap’, and ‘Coalescence’. We would suggest you call it a Local Gap.</p> <p>We concur with WBC comments which in summary are that further evidence is necessary to provide evidence/justification for the need for a Local Gap. This could be provided in the form of a background paper and as suggested should include:</p> <ul style="list-style-type: none"> <li>• What evidence is there to suggest there is the threat coalescence? A large amount of the gap is covered by Upper and Lower Canfold Wood, much of which is identified as ancient woodland and therefore already highly protected.</li> </ul>

	<ul style="list-style-type: none"> <li>• Have there been applications for development in this area?</li> <li>• What criteria have been used to define the land actually designated as the 'Local Gap', i.e. why these specific fields?</li> <li>• Is there any visual connectivity between the two communities? Can you stand in one point and see both for example?</li> </ul> <p>The policy states that applications will not be permitted unless it is ancillary to its use for public recreational purposes – however I cannot identify any such uses within this area with the exception of footpath.</p> <p>If you can provide sufficient justification, then there are a number of Local Gap policies in Neighbourhood Plans, one recent example is in the Hook Neighbourhood Plan paragraph 8.10 (page 26 onwards)</p> <p><a href="https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Neighbourhood_planning/Hook%20NP%20referendum%20270819.pdf">https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Neighbourhood_planning/Hook%20NP%20referendum%20270819.pdf</a></p>
<b>7.2 Conservation Areas and Historic Environment</b>	<p>The EEG NP could identify the Sayers Croft site as a non-designated heritage asset, this should be accompanied by a policy and a map showing exactly what is covered. A successful example of this is within the Hook Neighbourhood Plan, Section 10.17 onwards. A supporting document may be necessary in order to record the justification for the selections made.</p> <p><a href="https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Neighbourhood_planning/Hook%20NP%20referendum%20270819.pdf">https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Neighbourhood_planning/Hook%20NP%20referendum%20270819.pdf</a></p>
<b>EEG L1: Economy and Employment</b>	<p>The justification refers to the re-use of redundant agricultural buildings. In the first instance we would query how many of these there are in the Parish? If there are a number and you wish to encourage their re-use for employment purposes, then it is suggested that the policy includes criteria in relation to this matter. To assist you, the South Downs Local Plan policy SD41 covers this matter and may provide you with some ideas as to what to cover. It is more detailed than you would need</p> <p><a href="https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf</a></p>
<b>EEG U1: Communications infrastructure</b>	<p>This policy adds nothing to existing policies on landscape character / historic environment protect etc, but it does no harm. However, we query whether it is necessary.</p>
<b>EEG U2: Broadband Provision by Developers</b>	<p>We would suggest deleting this policy as it is a matter covered by the Waverley Local Plan and it is unlikely that you can provide sufficient evidence to justify taking a different approach in your particular community.</p>

<b>9.2 Water Supply and Wastewater Treatment</b>	The policy is missing from this section
<b>EEG T2: Quiet Lanes</b>	<p>The designation of a quiet lane is not a power that falls under the planning regime. It therefore cannot be implemented through the EEG NP. However you could cover the matter in the text and identify it as something you will continue to work with Surrey County Council to see introduced. If money is needed to implement the project you could list it in Section 13: financial Contributions. As an alternative you could introduce a policy seeking to protect the character of some of the rural lanes within the Parish. To assist you, the South Downs Local Plan policy SD21 covers the character of Historic Rural roads and may provide you with some ideas as to what you could cover.</p> <p><a href="https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf</a></p>
<b>EEG T3: Residential Car Spaces</b>	It is common for Neighbourhood Plans to have differing parking standards to those set often at a County level, but you will need to explain the differences and how they are justified in order to have a better chance at retaining it.
<b>EEG T4: Traffic Calming</b>	<p>A number of sources describe Home Zones as follows - <i>Home Zones are residential streets in which the road space is shared between drivers of motor vehicles and other road users, with the wider needs of residents (including people who walk and cycle, and children) in mind. The aim is to change the way that streets are used and to improve quality of life, by making them places for people, not just for traffic.</i></p> <p>Before you require them, you should consider whether this is typical of the characteristics of the village and you should set out some guidance as to what a home zone is in your context. As suggested by Waverley Borough Council you also need to ensure that Surrey County Council are content with the approach. It may be they have other criteria you could be adopting in the Parish. An alternative may be a policy similar to that in the South Downs Local Plan policy SD21, part 3 which would remove the need for a reference to Home Zones.</p> <p><a href="https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf</a></p>
<b>EEG T5: Heavy Goods Traffic</b>	Restricting the movement of HGVs is difficult through the planning regime and the comments from WBC need to be addressed. How much of this traffic is generated from within the Parish or are many of the issues relating to developments outside and vehicles travelling through? Wording along the lines of the following suggestion may be more acceptable to WBC and Surrey County Council as it is more flexible and can be adapted to different scales of development i.e. it allows for the

	<p>matter to be considered by an officer at the smallest scale and through a specific assessment if much larger:</p> <p><i>Development will not be permitted which, once completed, would generate Heavy Goods Vehicle Traffic which will harm the character, amenity value, and safety for pedestrians, cyclists and equestrian users of the roads within the Parish.</i></p> <p>The supporting text could include details of the particularly difficult areas such as The Street and Ockley Road and some photographs may help to paint the picture better.</p>
<b>Section 11: Housing Policies</b>	<p>Given that the plan is no longer allocating land for residential development, this section could be shortened and made more focused.</p>
<b>EEG H2: Affordable Housing</b>	<p>We would strongly advise that unless you have current and up to date evidence, including viability assessments, to justify a deviation from the WBC affordable housing thresholds (which are in themselves set at a national level), then any attempt to do something different will not be found sound at Examination. Given that most development already has permission and no new sites are being proposed, it is also questionable as to whether this will make any identifiable difference.</p> <p>If you wish to enable more affordable housing to be provided within the Parish your best route would be through working with a landowner to bring forward a Rural Exceptions site in accordance with the Local Plan.</p> <p>We would recommend that you delete this section</p>
<b>EEG H3: Size of Homes</b>	<p>The split of housing mix does not add up to 100%. If you are comfortable with the split set out in the representation from WBC, we would recommend you amend the policy accordingly. However, you could attempt to push the boundaries a bit and tweak it slightly using the existing mix of housing in the Parish as evidence as well as consultation feedback. Such data should be included in the plan to provide further justification. Your policy as written also only applies to sites of 10 or more of which there will now not be many. You might want to consider testing whether your policy could apply to all sites, not just those over 10 homes in size.</p>
<b>EEG H4: Infill Housing and Windfall Sites</b>	<p>Policy RD1: Rural Settlements within the WBC 2002 Local Plan covers this matter. We would recommend you delete policy H4 as it is adding a layer of complexity and potential confusion as can be seen in the responses to the consultation.</p>
<b>11.5 Design and Density</b>	<p>We would concur with WBC comments on the density of development proposals; in addition, because the figures are in the supporting text and not in a policy they will not carry as much weight. We would always recommend that density of development is based on the character of the surrounding area rather than attempting to apply mathematical calculations. In addition, given the low density nature of much of the</p>

	<p>village this is likely to conflict with the ambition to provide smaller homes. We would recommend that this is removed and instead more emphasis is placed on the Design Statement which should contain an assessment of the existing character of the built up areas.</p>
<p><b>EEG H5: Design and Density</b></p>	<p>The production of a Design Statement is an excellent way of ensuring design within the Parish is in character. However, if it has not been consulted on and if WBC have not seen or approved / endorsed it, it will carry no weight. This is an area where the work of a Neighbourhood Plan can really add value, particularly in your case where you are not proposing to allocate land and will be dealing reactively to predominantly infill applications. There are lots of examples of Neighbourhood Plans then including the key considerations from the Design Statement into a policy which will then have significant weight – an example of one is in the Thruxton Neighbourhood Plan, Policy H4: Design on page 56 –</p> <p><a href="http://www.thruxtonvillage.com/shared/attachments.asp?f=1b8f11ee%2Db15%2D437a%2D93c7%2Df0834c55d168%2Epdf&amp;o=00%2DThruxton%2DNeighbourhood%2DDevelopment%2DPlan%2DPre%2DSubmission%2DDraft%2Epdf">http://www.thruxtonvillage.com/shared/attachments.asp?f=1b8f11ee%2Db15%2D437a%2D93c7%2Df0834c55d168%2Epdf&amp;o=00%2DThruxton%2DNeighbourhood%2DDevelopment%2DPlan%2DPre%2DSubmission%2DDraft%2Epdf</a></p>
<p><b>Section 12: Housing Sites Policies</b></p>	<p>This section should be merged with the information on the housing position at the beginning of the document. Its purpose as laid out is unclear and the use of the word ‘Policies’ in the heading implies there are policies, when there are not.</p>

- 3.8** Finally, before progressing to the next stage you should discuss with WBC the status of any Sustainability Appraisal / Strategic Environment Assessment.