

PRE-SUBMISSION COMMUNITY CONSULTATION (Updated 31/10/17)

RESPONSES FROM RESIDENTS		
No.	Comment	Response/ <b>Action</b>
1	Re: Introduction: <i>It has therefore never been our mandate to combat the number of houses that are proposed in West Horsley. If we did, our Neighbourhood Plan would fail its examination as it would not be in general conformity with the legislation.</i> This would seem to be a fundamental point and as written I don't agree. I agree if you try and combat to zero any development it would fail, but surely this is about the scale of development. Unless the Parish Council argue for a (low) maximum it effectively gives any developer a green light to apply pressure with no backstop to prevent development based on actual numbers.	Please read our 'What a Neighbourhood Plan Can (and Cannot) Achieve' leaflet.
2	The points in the plan are fine but the fundamental issue is whether it's 10, 100 or 1,000 new homes.	Noted.
3	The wider plan should be pushed to ensure brown field sites are used, military and other sites are also used as a first resort, this should then reduce the amount that other villages have to take including ours.	Noted.
4	<p>We are very disappointed to see that Silkmore in Silkmore Lane a Grade 2 listed building has not been included in the list of local buildings of historic interest in your neighbourhood plan. Nor have other 18th C buildings in the lane been included namely Yew Tree Cottage and Cripplegate.</p> <p>Is this an oversight? There are 41 listed buildings in the village which need to be protected.</p> <p>Silkmore Lane is under threat from the local plan with the proposed extension of the village settlement area. The fields directly behind Yew Tree Cottage, Two Chimneys, Goodwood, Willowpond, Silkmore, Ashley Cottage are now under threat of development in a bid to straighten up the village boundary. Silkmore dates back to 1750 and is the oldest building in the lane and is of historical interest and value. The open aspect at the back is of prime importance having been yeoman's cottages and latterly the village smokehouse. The setting as a historical building should be preserved and not inset with new developments enclosing it. For it sits in a plot with beautiful views at the back overlooking open country side down towards Ripley Lane and beyond to Hatchlands farmland and woods. This land is enjoyed by a great many who live in the village with the public footpath access from Silkmore Lane to Ripley Lane. The character of this side of the village should be preserved. We already have a monument of bad planning in Orchard Cottage, which is a blight on the landscape and should never have been allowed. It used to be a pretty Victorian cottage – a third of the size!</p> <p>I would like to understand why Silkmore/Yew Tree Cottage and Cripplegate have not been included in your list of buildings of historical interest and value and have your assurance that you will reconsider.</p>	<p>Listed Buildings are not included in the NP because they are already protected. Please see 5.41.</p> <p>They are however, listed in the Community Assets Supporting Document.</p>
5	<p>I refer specifically to the mission statement on your website 'ensuring our village retains its character'.</p> <p>I attended last week at GBC the appeal hearing lodged by Greenreach Ltd. against the original decision for the 24.7 hectares field opposite my house to be turned into a SANG and we are now awaiting the Govt. Inspectors decision. If successful this would enable developers to build 1250, yes 1250, houses in our area. Greenreach also have an option to build houses on the former Tyrrell site in Long Reach which they are eager to bring forward pending the result of their appeal. Combine this with the proposal by GBC to change the external greenbelt village boundary to incorporate 135 houses next to my house whilst not forgetting the planned car park in the SANG for 24 cars which they feel will lure people away from the Thames Basin SPA and the village character will be destroyed. Furthermore, the cars blocking Long Reach each weekend because of the football club would cause absolute mayhem. If Wisley gets the go ahead then we will no longer be a village, more of a conurbation.</p>	<p>The NP cannot influence GBC strategic planning decisions, such as altering the Green Belt or approval of a strategic site for development or SANG.</p> <p>Wisley is not in our neighbourhood area.</p>

Response/Action: Black (comment); **Black Bold** (action taken);

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6	I am full of admiration for those who have so diligently pieced together this excellent plan but presumably it becomes almost redundant when faced with the seemingly unstoppable greed of 'big business'.	Noted.
7	We have read the Pre-Submission version of the WHNP and are very happy with the ideas and points contained within it.  In particular we are delighted by the mention of single storey dwellings which are very important, particularly to those of us who are no longer young. Should we become a little infirm, we currently face the prospect of having to move to find single-storey houses.  We thank you for all the work you have put in to this plan.	Thank you.
8	I object to one item in the Neighbourhood plan. The point in question is the note at the end of section 5.54.  At this more than 60 West Horsley residents, including several from The Horsley Veterans, do not approve of the Proposed Sculpture and would only approve a conventional Celtic cross or plynth similar to the one recently placed in Cobham. The so-called Community project has scant support and, despite being voted down at their recent village hall presentation, are choosing to ignore public opinion. If you would like a copy of the petition we have raised please let me know. It includes a number of well-respected residents in West Horsley. If you require further information I would welcomed the opportunity to discuss it with you.  Suggested alternative wording: WAR Memorial - a significant number of West Horsley residents & Horsley Veterans would support a Conventional Village Celtic Cross or Plynth similar to the new one in Cobham on one of the designated local green spaces as long as it had the approval from the majority of public opinion in the village.	WHNP is not petitioning for the installation of a memorial, or trying to influence its design/location.  It is simply ensuring that should the village decide to install a memorial on a proposed Local Green Space, the NP would allow planning permission to be granted on the basis that it would "enhance the public significance of the Space".
9	WH3 – Certain small plots south of A246 in Green Belt should be allowed to build small developments. Example is large plot on lane within KT24 6EJ (Shere Road). The plot has old garages, old and broken green houses and old foundations. A couple of buildings with garden would enhance the area. The farmland between the two settlement areas on corner of East Lane/The Street/Long Reach needs the old cow barns removing and sensible development allowed to take place bearing in mind the existing farm building and nearby cottages.	Noted.
10	WH13 – As well as new infrastructure necessary for new housing development it is important that SCC properly maintain the existing infrastructure roads and drainage.	Noted.
11	I support the war memorial on corner of Silkmore Lane/The Street.	Noted.
12	Preservation of farmland is paramount.	Noted.
13	Thank your team for your tremendous work!	Thank you.
14	I have no specific comments to make. However, I feel that somewhere, and I can't see the best place, there should be a mention "That the Parish will seek to influence SCC and other bodies in order to ensure that our roads, tracks, footpaths and maintained to the highest standard".	The Parish Council is already doing this.
15	My main comment is to congratulate everyone involved with WHNP on an excellent plan. It is very clear and readable.	Thank you.

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16	Many thanks to all those who put so much time and effort into producing the Plan. Was rather surprised at choices made in Policy WH8. Why was Nightingales (x) of which only the shell remains included and not e.g. Silkmore and Yew Tree Cottage etc.	Listed Buildings are not included in the NP because they are already protected. Please see 5.41.  They are however, listed in the Community Assets Supporting Document.
17	I write to thank everyone involved in working on the neighbourhood plan – an enormous amount of work and time involved has been put into producing the draft plan and congratulations are in order.	Thank you.
18	I don't know whether it is appropriate to suggest that the conservation area of West Horsley might be extended down into Ripley Lane to the railway bridge at Lower Hammonds Farm. The west side of the village is so beautiful and should be preserved at all costs for future generations to enjoy.	NPs cannot alter boundaries within the neighbourhood area. Suggestion will be passed to the Parish Council for consideration.
19	I have alarmingly noticed the village boundary has changed behind houses in south end of Ripley Lane/ Silkmore Lane from a line excluding all non-farm land to include private land from Ashley Cottage to Peartree Cottage. Does this mean any speculative building can be allowed on land owned by owners of this land or is this still covered by Green Belt regulations? Your early comments appreciated.	These comments relate to the 2016 version of the Local Plan.
20	We support the Pre-Submission Version of the West Horsley Neighbourhood Plan in its entirety, in the context of what can be done, bearing in mind the limitations imposed by not being able to disagree with the Guildford Plan.	Thank you.
21	I wanted to write to offer my support to the committee's view that West Horsley should retain its rural character and protect the open green spaces of the village. The threat to the green belt from Guilford Council is wholly unacceptable and therefore I value the contribution the committee has made in standing up to this.	Thank you.
22	<p>This letter is to register my objection to (a) Clauses 2.3.3. &amp; 3.4.9. within the 'Community Assets, Infrastructure Business and Economy - Subgroup presentation' section, and (b) the 1st of the 3 items after Clause 5.54, starting 'Memorial' and which the reader is asked to 'Please Note', all within the 'Environment and Landscape Policies', and to which I will refer to as 'clause 5.54.'</p> <p>The items to which I object seem to be part of an attempt to create (clause 2.3.3) and perpetuate (clause 3.4.9) a myth that there is a demand in the village for a new war memorial or some piece of artwork, while clause 5.54 speaks as if it is already a fait accompli and talks of siting it in a designated 'Local Green Space'. Certain of the assertions made in clause 3.4.9 seem to be untrue. The myth would appear to be the result of an 'initiative' by an unnamed Parish Councillor who at a recent West Horsley Parish Council Meeting read out a report parts of which lead one to doubt the veracity of parts of Clause 3.4.9. The reading of this report is minuted within West Horsley Parish Council (WHPC) minutes as No 17.117, while the report itself appears, as the minute states, on the website.</p> <p>I wish to see all the above-mentioned items, i.e. clauses 2.3.3, &amp; 3.4.9 &amp; 5.54 together with any other mentions of a new war memorial or piece of artwork in a designated 'Local Green Space,' deleted from the WHNP. This will also be in accordance with the wishes of the Horsley Branch of the British Legion, and of Horsley ex-service personnel, whose feelings in the matter appear to have been dismissed with contempt. The WHNP is not the place for introducing what seems to be a completely unnecessary and unwanted project.</p>	<p>WHNP is not petitioning for the installation of a memorial, or trying to influence its design/location.</p> <p>It is simply ensuring that should the village decide to install a memorial on a proposed Local Green Space, the NP would allow planning permission to be granted on the basis that it would "enhance the public significance of the Space".</p> <p><b>WH11 - NPSG to amend Note on Memorial to read: A West Horsley community working group is currently considering the siting of a Memorial in the village. If the location of this site was to be one of the designated Local Green Spaces this would be considered to be enhancing the public significance of the space.</b></p>

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<p>For ease of reference, the items to which I object, and why, are set out below. WHPC Minute 17.117, together with the report, are also quoted. At this point may I apologise to the reader for the length of this letter, but it will be seen that most of it is made up of quotations.</p> <p><u>Clause 2.3.3.</u> 'To create and erect a Memorial to the fallen from World Wars 1 and 2 and all subsequent conflicts to the present day on an appropriate site within the village.'</p> <p><u>Clause 3.4.9.</u> (with the parts whose veracity are thought to be doubtful in italics): 'In recent months, <i>the desire for West Horsley to have a war memorial has gathered momentum.</i> The original timber memorial is very frail and no longer in situ. <i>A benefactor from within the village has made a donation towards the creation of a new memorial</i> and the Parish Council has confirmed its support and allocated some resources. Active work is now underway to establish an appropriate memorial to the fallen, and the Neighbourhood Plan fully supports its creation and placement in a suitable location to be identified by the committee <i>being set up to oversee the matter in liaison with the Parish Council</i>'</p> <p><u>Clause 5.54</u> reads: 1) Memorial: A West Horsley community working group is currently considering the siting of a Memorial (in) the village. If the location of this site was one of the designated Local Green Spaces this would be considered favourably.</p> <p><u>Minute 17.117</u> of WHPC reads as follows: 'War Memorial Committee' - A Parish Councillor involved in the War Memorial Project read out a report to the meeting. This report will be available on the Parish Council's website'</p> <p><u>The report</u> by the unnamed Parish Councillor who conceived the idea of a new war memorial or artwork in the village is below. The assertions within it apparently conflicting with clause 3.4.9. are italicised</p> <p>'On May 13th, West Horsley War Memorial committee mounted a mini-exhibition to gauge opinions and ideas from the villagers who might want to contribute their ideas to this project. It was a simple consultation exercise. Sadly, the whole intention was nullified by a small group of well-meaning people who were unfortunately very ill informed about the project. This was especially unfortunate as the committee had made no concrete and final decisions. A "petition" was presented to the chairman of the committee, Jen Powell, almost as soon as the doors were opened. It was not a proper petition, (No addresses, no name of person raising the petition etc.) but it did have, I believe, <i>about 60 signatures.</i> It was evident from the comments made on the petition by various people that they had somehow got the wrong end of the stick about certain things and were not in receipt of all the facts. This resulted with visitors to exhibition arriving with firm opinion before they had actually seen or visited the exhibition. This, in my opinion, brought discredit to the very people whose interests they were trying to protect. Anyway, this is a moment to put things right, I hope. Each 'misconception' will be dealt with in turn. Although the original idea for this memorial came from me, <i>the developing idea is the result of a committee of eight people.</i> No public money of any kind has been spent so far. A donation was made by a member of the committee (now resigned) for the specific purpose of helping with the inevitable and immediate running costs of such an initiative, such as the hire of the Cedar Rom for the exhibition. The residue will be put into the final fund. All the preparatory art work, all the oversize and printing generally and even the money used to open an official bank account was all donated by the committee members.</p> <p>So far, the only money spent has been in the hiring of the Cedar Room for the specific purpose of informing the village of how things were developing after only three committee meetings. There was a very simple and straight forward questionnaire for West Horsley residents only Those who felt restricted by the questions on the front page were invited to express their opinions on a whole side of A4 and more paper was on offer for those who felt that was inadequate.</p>	
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<p>It was clear from some of those responses and comments made on the "petition" that <i>people</i> had been misinformed and expressed their displeasure with great force. The proposed support of 10 thousand pounds from the PC remains in its reserve. It will naturally only be released when the PC is satisfied that the project is considered worthy of such support. Despite comments to the contrary and including some made directly to one of our Borough Councillors, we are not mishandling public money. I did not ask for this money, it was volunteered and unanimously supported in an open Parish Council meeting and was properly minuted and these minutes published on the village notice boards and on our website.</p> <p>Two requests for funding were made to the Community Fund. Either the requests did not reach their committee or were somehow overlooked. Incidentally two members of the Community Fund had suggested I apply to the fund. A few days ago, the <i>Memorial committee</i> was informed that a member of its own committee but associated with the Community Fund, had advised against the project. Incidentally just to clarify further, there is no funding other than private donations that would contribute to the building of a new War Memorial of whatever design. Funds are only available, as we understand it, to restore crumbling and existing Memorials that are in need of repair. Funding for public works of art is more easily accessed. It seemed therefore that combining both ideas was an ideal solution.</p> <p>A war memorial is not only for first and second world war heroes, it does not have to be on church land, it does not have to bear a cross and indeed the term "Traditional Memorial" is meaningless as there is no such thing. We have consulted, the Br Legion, The War Graves Commission, The Church authorities et al. It does not even have to be a physical memorial. It could be a school prize, a piece of music, even a bus shelter etc, etc. There is no reason why there can't be several memorials in a village, or even a personal memorial in your garden or on a house that you may have built. It can include the names of any who have ever served in any of the forces. Those who survived any conflict but who brought credit to their community can also be included.</p> <p>In our last committee meeting, it was decided that the name of the fund should perhaps be changed from West Horsley War Memorial Committee to something of the order of Memorial Sculpture Committee or perhaps even West Horsley Memorial Sculpture Committee. The final title is yet to be agreed.</p> <p>Terms of reference have been drawn up. It is quite difficult to find an appropriate format for this kind of committee, but it has been achieved and the detail will be discussed in our next Memorial meeting. No doubt, amendments will be made and then it will, hopefully, be ratified and published.</p> <p>I hope I have put to rest any misconceptions about what we are about. I should point out AGAIN that this is NOT a PC initiative. Two of the committee happen to be PCs. Nobody represents any particular body. They were invited to serve entirely because of the kind of persons they are. Between us, as a committee, we have given over two centuries of voluntary service to our community and four of our members have been publicly honoured for those services. One served as a magistrate! This is not a committee that is about to behave in a cavalier way in dealing with a project of this kind.</p> <p>I do not intend to answer any questions about this statement this evening. Any queries should be written and addressed to the committee via my address which is publicly available on the Parish website. This statement will, I hope, appear in the church newsletter/magazine and in the Horsley Preservation Society magazine probably in a shortened form. It will naturally appear in the minutes of this meeting. Thank you for your attention.'</p> <p>This report tells us that the whole project was conceived by the unnamed Parish Councillor who read it out, as an 'initiative'. A committee of 8 (one of whom is now opposed to the idea) has obviously existed for a long time, rather than 'being set up' as per clause 3.4.9.</p>	
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	<p>It also tells us the assertion that '<i>the desire for West Horsley to have a war memorial has gathered momentum</i>' should perhaps be replaced by the statement that there is considerable opposition to 'the desire.'</p> <p>We also see the assertion that '<i>A benefactor from within the village has made a donation towards the creation of a new memorial.</i>' is not supported in the report to the WHPC and appearing on their website. Money has not come from a benefactor, but from the committee members (committee being set up?), including from one who has now resigned. For ease of reference the relevant part of the report is quoted again:</p> <p>'A donation was made by a member of the committee (now resigned) for the specific purpose of helping with the inevitable and immediate running costs of such an initiative, such as the hire of the Cedar Rom for the exhibition. The residue will be put into the final fund. All the preparatory art work, all the oversize and printing generally and even the money used to open an official bank account was all donated by the committee members.'</p> <p>May I draw the reader's attention to the paragraph in the report which been underlined. Does the difficulty of finding an appropriate name for the fund, or is it the committee (?), suggest the lack of a defined purpose other than the creation of some form of memorial or artwork for its own sake? Does it suggest the 'project' is driven rather than responding to a need? Perhaps the suggestion of a 'war' as opposed to an ordinary memorial or artwork of some sort was an attempt to gain emotional traction for what is an unwanted and unnecessary 'project'?</p> <p>An alternative approach which would address my objections/comments would be for the existing war memorial described as 'frail' to be repaired as necessary, and the 'project' to replace it or create an additional or alternative memorial or 'artwork' be abandoned, all without any cost whatsoever to public funds.</p>	
23	I agree with all the points in the Draft WHNP, and thank everyone involved for their hard work in producing such a concise document for the good of all the residents.	Thank you.
23	<p>Having read the pre-submission version of the Plan I would like to thank the Steering Group for its work in producing a well thought-out and constructive document.</p> <p>I do, however, find myself at odds with one policy - WH5. Section 5.36 confirms that this policy will allow affordable housing <i>adjoining</i> the settlement boundary <i>within</i> the Green Belt. My understanding of settlement boundaries and Green Belt is to contain development to within the boundary of the settlement and to prevent incursion into the Green Belt. Policy WH5 would appear to allow circumvention of these constraints and, effectively, to undermine the purpose of a settlement boundary by, in essence, extending it.</p> <p>If my interpretation is correct, then I would like to register my objection to the policy.</p>	Rural Exception Housing is covered by NPPF and Guildford's Local Plan. WHNP should therefore include a policy too. We cannot stop Rural Exception Housing, but we can influence the design of any future development and ensure that the properties are used to meet the housing needs of local people.

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24	<p>If a large number of houses are to be built in the village then I believe all current proposed sites are clearly wrong and should be removed. All proposed housing should be on one large site situated between East Lane and the railway line to the south, Lollesworth Lane to the west and Ockham Road to the east. The old wood on the site should largely be removed. The development should include:</p> <ol style="list-style-type: none"> <li>1. A new larger replacement school for the Raleigh should be constructed on the site (built and paid for by the developers) and the old Raleigh school can then be demolished and replaced by new housing.</li> <li>2. The site would have the main road entrance via a new roundabout constructed in East Lane.</li> <li>3. To reduce traffic congestion a pedestrian tunnel should be built under the railway line embankment opposite the Horsley Surgery. This will enable safe, easy access to shops, railway station, doctors and East Horsley village hall. It will also allow residence of East Horsley a safe pedestrian route to the new school which would also reduce traffic.</li> <li>4. By having just one large site this will also make the provision of utility services easier, which will reduce the number of surrounding roads that will have to be dug up to provide new sewers, ducts and cables to be laid as most of the existing infrastructure cannot cope with such a large increase in demand. It will also contain all construction traffic to one site accessed off the main village road thereby reducing disruption.</li> <li>5. Limited development of a very small number of individual houses on sensible sites around the village can still be allowed to enable the village to evolve slowly over time.</li> </ol>	<p>Noted, but the strategic sites are part of Guildford Borough's Local Plan. Please read our 'What a Neighbourhood Plan Can (and Cannot) Achieve' leaflet.</p>
25	<p>Strategic View number 6 - The Village Pound Most of the views in summer have now gone due to the vast number of trees that the previous owner of the Old Rectory planted around the field (and the Highland cattle departed with the owner about 5 years ago) and his refusal to allow the hedge to be cut fronting Butlers Hill. p.s. As the Village Pound is still considered important perhaps the Parish council would like to consider replacing the wooden posts around the Pound as out of the original 5 posts erected some 22 years ago only 2.5 posts (and they are rotten) now remain.</p>	<p>This is not a matter for the NP. This comment has been passed on to the Parish Council and is being investigated.</p>
26	<p>We have read the current plan in depth, and have no further comments to offer, except to say that, in our opinions, the present version is excellent, so we heartily congratulate all concerned with its drafting. Thank you very much for your efforts.</p>	<p>Thank you.</p>
27	<p>Please be advised that I do not approve the current wording in the Note to Section 54. I propose the following wording would be more appropriate: War Memorial – a significant number of West Horsley residents and Horsley Veterans would support a Conventional Village Celtic Cross, or Plynth similar to the new one in Cobham, on one of the designated local green spaces as long as it had the approval of the majority of public opinion in the village.</p>	<p>Noted.</p>
28	<p>Policy WH2 – As Area 5 is the Conservation Area, and as that area has its own specific policy under WH1, shouldn't it be removed from this policy?</p>	<p><b>Correct. NPSG has removed Area 5 from WH2.</b></p>
29	<p>Policy WH5 – I still have concerns that this would allow an unlimited number of one acre sites to be identified in the Green Belt protected area surrounding the village. I feel that we should include an upper limit as to the number of Rural Exception Housing Sites that the village would wish to see developed. I would propose just one, or a maximum of two, sites with a maximum of 10 dwellings on each. After development of one (or possibly two) site/s then Green Belt 'protection' would be retained for the remaining area. I have concerns that, as currently drafted, our current 'open ended' approach would, in my opinion, leave the whole Green Belt area surrounding the village constantly under threat from potential development as a Rural Exception Housing Site throughout the life of the plan.</p>	<p>Rural Exception Housing is covered by NPPF and Guildford's Local Plan. WHNP should therefore include a policy too. We cannot stop Rural Exception Housing, but we can influence the design of any future development and ensure that the properties are used to meet the housing needs of local people.</p>

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30	Item 5.39 – Is it still correct that The Raleigh School "...is actively seeking to relocate to an appropriate site elsewhere in the village"? If this is not the case, should this element of this item be deleted?	We believe it is still correct. GBC's 'Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)' states that site A41 is being made available for a re-located primary school.
31	Item 5.44 – Should this not now be changed from "...will open in..." to "...opened in ..."	<b>Agreed. NPSG to amend.</b>
32	Policies map – I think that the outline for the proposed development area of West Horsley Place is unclear. Perhaps we should shade this area rather than outline it in red?	<b>Agreed. JM to ask GBC to amend Policies Map.</b>
33	May I seek clarification on draft policy WH5 - small scale affordable housing adjoining settlement boundaries? My understanding of a "boundary" is one of limitation and containment. Is the proposal here that (settlement) boundaries may be adjusted (i.e. extended) to allow for further housing development even if that involves incursion into green belt land?	The NP does not refer to any areas as being suitable for "adding to the settlement area."
34	Many thanks to all of those in this very comprehensive neighbourhood plan. It is very clear and well presented. Given the constraints of its scope, particularly in relation to the potential growth of the village, it addresses all the areas that can be influenced and I support all the proposed policies in the plan, particularly those relating to 'Housing mix'.	Thank you.
35	I wholeheartedly support the West Horsley Neighbourhood Plan and would vote to support it if the Referendum were based on the current Pre-Submission version. I would like to see a few changes/corrections in the "Community Assets, Infrastructure, Business & Economy" document take place relating to West Horsley Wheel of Care and who it is run by and where from (not St Mary's Church or from the Parish Office) but know that detailed comments by the Trustees of West Horsley Wheel of Care have already been submitted but the paragraphs which are of particular concern to me are 3.4.4 and 3.4.7. I would also particularly support Policy WH6: Community Facilities. All the facilities listed are of overwhelming importance to many, many people in the parish for lots of different reasons but of particular significance is West Horsley Village Hall which is a hub for many activities in the village and from which several businesses are run. The playground at West Horsley Village Hall is also particularly precious and is well-run/maintained and much-used. Policy WH11: Local Green Spaces is therefore also of particular interest to me.	<b>Proposed amendments to CAIBE Supporting Documents will be made. See Wheel of Care comments below.</b>
36	I am e-mailing to support the West Horsley Neighbourhood Plan and wish to thank the team for the enormous amount of hard work they have put in to it and their dedication to the project. Were a Referendum to be held based on the current Pre-Submission version of the Plan, I would vote to support it.	Thank you.
37	Thank you to the steering group and to West Horsley PC for the huge amount of work that has gone into compiling the plan. I have no comments to add regarding the plan.	Thank you.
38	I have no comments to make, i.e. no amendments to suggest. I support the WHNP and would like to thank all those who have worked so hard putting it together.	Thank you.

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39	<p>This is essentially to add one to any list you may have of West Horsley residents who have registered their approval of your group's work done so far. It has in fact been a rather impressive operation and I am particularly appreciative of the quiet but persistent way in which the residents have been regularly reminded of the opportunities to study the group's work and to make their views known.</p> <p>Because we are now entering new territory, there can be differing views on how the village's case should be made. I have no problem at present with the very thorough and detailed approach and can only hope that the Council will continue to show a genuine interest in what you have produced.</p>	Thank you.
40	<p>Re: Policy No. WH2 "<i>Development proposals in Character Areas 4, 5 and 8 will be supported...</i>"</p> <p>Firstly, in the previous draft NP of February 2017, policy WH2 was sub-titled: "<i>Design Management within Village Settlement – Character Areas 4, 7 &amp; 8</i>". If the change is intended then it potentially conflicts with policy WH1 which deals specifically with the Conservation Area, which is defined as Character Area 5 on the map on page 56.</p> <p>Secondly, a core theme on the Economy in the draft Local Plan includes the support of rural businesses. Yet the site A40 identified in the draft Local Plan, which falls within character area 8 of this NP, will severely affect the business of the commercial Horsley caravan and camping park immediately neighbouring this site. If the proposed 120 houses are built on this land, then the campsite would be surrounded on 3 sides by development. Who would want to park their caravan adjacent to a housing estate? The organisation's website will probably need to change in respect of the following claim: "Horsley is a peaceful campsite tucked away down the end of a quiet lane." No mention of the incongruity of the site's inclusion in the development plan with the policy on rural businesses has been made by GBC despite this being pointed out to it in earlier 'consultation' exercises. This NP submission also makes no mention of the incongruity and appears to explicitly support it. It should not be.</p>	<p>Conservation Area is within the Settlement Area.</p> <p>WHNP cannot influence GBC's strategic sites – the Parish Council is leading this.</p>
41	<p>Re: Policy No. WH4 "Proposals for new residential development within the defined settlement boundary of West Horsley will be supported, provided they have had full regard to delivering the following housing types:"</p> <p>I support the sentiment of this policy in that it appears to promote affordable and smaller housing, but it is far too weak. "... have had full regard to..." provides an enormous regulatory hole through which developers will drive bulldozer and crane to build the larger houses that make them more money, pleading as they do 'viability'. See <a href="http://www.cpre.org.uk/media-centre/latest-news-releases/item/4602-developers-renege-on-affordable-homes-as-countryside-faces-housing-crisis">http://www.cpre.org.uk/media-centre/latest-news-releases/item/4602-developers-renege-on-affordable-homes-as-countryside-faces-housing-crisis</a></p> <p>Change "provided they have had full regard to delivering the following housing types" to "provided they deliver the following housing types".</p>	Noted. Great care has been taken by WHNPSG and its professional adviser in the use of words for policies.

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<p>42</p>	<p>Development supported subject to only nebulous constraints - The strap line for the draft Neighbourhood Plan (NP) is 'Ensuring our village retains its character whilst continuing to meet the needs of our community'. I am highly dubious that it will ensure that the village retains its character. It is mandatory that it be consistent with the GBC Local Plan, and so cannot resist any development that GBC throws at West Horsley; GBC will ensure that it cannot by withholding approval if it should try. Neither will the Neighbourhood Plan stand in the way of any development come the next Local Plan change (which is quite likely to be before 2033, given that the 2003 Plan might have lasted only 10 years if the 2013 version had not drawn such a volume of criticism).</p> <p>Policies WH 1,2,3,4,5,7,9,10 of this draft NP all state explicit support for development, albeit with some indefinite provisos. The design principles are nebulous and the purported constraints weak. For example, in policy WH1 (i), "proposals should not impact on the spacious nature of the area and the significant views across open farmland" is woolly (what defines 'spacious'; when is a view significant; how many houses does it take to 'impact on' a spacious nature or on a significant view?) and unlikely to be given much weight in planning decisions. Similarly, in WH2(i), "Where adjoining the boundaries of the village, the emphasis will be on the provision of housing types and built forms that help create an attractive rural edge to the settlement and maintain existing countryside views" simply adds confusion: just how can extra housing maintain existing countryside views For WH1 (vi), in what circumstances could loss of mature trees be 'necessary': to make way for development or its access?</p> <p>In any case Policy D4 of the GBC draft Local Plan provides very similar principles to the design ambitions of this WHNP. Probably neither would be heeded very tightly, but it is foolish to provide support for development to superficially gain purchase on design principles that merely repeat the Local Plan ones.</p> <p>Furthermore, what justifies making different statements about the value of views and open countryside in the different policies? Is there any basis for the different wording in the individual proposals about this value: 'should not impact on the spacious nature of the area and the significant views across open farmland' in policy WH1'; provide 'housing types and built forms that help create an attractive rural edge to the settlement and maintain existing countryside views' in WH2; but should only respect (whatever that signifies) particular views 'in the design or positioning of new development' in WH3.? The spacious nature of the area and the significant views across open farmland are just as important to the openness of the Green Belt along the rest of Ripley Lane, Green Lane, Long Reach, East Lane, Shere Road and the A246. The responses given by parishioners to Question 8 of the 2015 Questionnaire organised by the WHNPSG, "Are there any specific green spaces you would like to see retained?" strongly suggest that <i>retention of most green spaces</i>, which implies the views across them, has strong local support, and that there is no basis for the different stringencies of 'view-protection' in different locales.</p> <p>The Plan purports to have a key objective of 'The continuation of the present Green Belt designation to preserve the special character of the Parish and the surrounding countryside.' And yet its proposals all begin with 'Development will be supported'. Doubtless this type of development-friendly Danegeld clause has been instrumental in rCOH having a record of success in gaining approval for so many Neighbourhood Plans: it is a phrase that would warm the hearts of all LPA officials struggling to fit housing targets into localities that do not want them. However, in any planning considerations the specific <i>policies</i> will doubtless carry more weight than the less specific key objectives, particularly since GBC will insist that setting the boundary of the Green Belt is in their preserve, as indeed it is.</p> <p>For context, the NPPF makes explicit reference to the opportunity for neighbourhood plans to promote more development than is set out in the local plan. This draft gives the impression that the Parish will welcome new development (subject to a few weak and woolly provisos) making the task harder for WH Parish Council and others to oppose the excessive development proposed in the draft Local Plan. The existence of 2 conflicting official viewpoints on the draft Local Plan, one emanating directly from the WHPC, the other from a body acting under the auspices of the WHPC can only weaken the message of either. One mouthpiece says</p>	<p>This is comment only and makes no proposals.</p> <p>Care has been taken by WHNPSG and its professional adviser in the use of words. The author takes exception to the words without making any contrary proposals.</p> <p>Comment – but no proposal of any alternative wording.</p> <p>The author is using selected passages as set out below. He asks rhetorically why the difference between the passages and the question is answered when it is realised that he is not comparing like with like. WH1 does not contain these words. WH2, from which the passage is taken, is referring to the developments that adjoin the boundaries of the built-up area of the village.</p> <p>The passage quoted from WH3 is referring to views in specified areas. This comment re rCOH is made with no apparent justification.</p> <p>The phrase employed is one recommended by the Government's own guidance. The author also ignores the reality. He acknowledges that the NPG cannot contradict the LP. Therefore, the Plan can</p>
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	<p>'minimise development'; the other says 'development will be supported'. The WHPC direct opposition is of course more in tune with the wishes of the Parishioners. If the WHNP Steering Group contests my interpretation of this likelihood, then it should assess to which of the particular areas of the Parish this draft NP gives any additional protection (other than the protected Green Spaces already specified in the draft). This will clarify the situation for GBC, and also make those areas explicitly clear to the parishioners so that they know what protections, and what sacrifices they will be voting on. Either the draft NP gives extra protection to particular areas of the Parish or it doesn't achieve anything other than weakly stated design principles (weak especially because the policies explicitly 'do not prevent or discourage innovation in architectural forms or details').</p> <p>This draft NP just adds further mud to the opacity of national and local planning rules. This lack of clarity, couched alongside 'Development will be supported' statements, is just as likely to make development approval easier rather than harder. If voted for by the Parishioners it will also give the impression that they are now sanguine about further development, so encouraging GBC to dump more development on the Parish. Exactly what and where is the draft NP adding in terms of concrete, unarguable guidelines 'to preserve our environment and landscape'?</p> <p>To state the obvious in a blunt way, the essence of the difficulty is that the conceptual design of Neighbourhood Plans was a) to encourage <i>extra</i> locally-led development; and possibly b) to provide a cathartic vehicle by which to deflect opposition to government-led development, with warm, meaningless words suggesting that localism is holding sway. The purpose was not at all to provide a vehicle for <i>restricting</i> development. Therefore, to try to design a NP for a village that generally wants only minimal development is like trying to fit a square peg into a round hole. I am sorry to say that, rather than hammer away, it is likely better to recognise the lack of utility of the peg.</p>	<p>have no effect on the level of development – only the character and design of it. The phrase complained of is to be understood as "Development which has been approved will be supported provided it meets these criteria."</p> <p>The NSPG does not accept this. We refer the author again to the introduction to this Plan.</p> <p>The NSPG does not accept this. We refer the author again to the introduction to this Plan.</p>
43	<p>Confused interaction with NPPF policy on Green Belt</p> <p>WH Parish is currently protected by Green Belt policy within the NPPF (which attaches great importance to Green Belts, confirmed recently by Sajid Javid, and likely in the Government's forthcoming White Paper on Planning), the more so outside the settlement area (at rough estimate only 10% of the total Parish area), but to a certain extent within it. GBC's draft Local Plan wishes to both extend the settlement area in particular locations and remove that extended settlement area from the Green Belt.</p> <p>Whatever the extent of the settlement area, the draft NP cannot show or imply support for development in any areas that are within the complementary area of Green Belt, unless that development is consistent with stringent Green Belt policies; viz paragraphs 87-92 of the NPPF (in particular 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances!'). <i>How can a NP approve Green Belt development when the Government policy does not?</i></p> <p>Neither can the draft NP itself propose or indeed implicitly support changes to the boundaries of the Green Belt: such changes are the sole preserve of the LPA, i.e. GBC, and can only be altered 'in exceptional circumstances'. However, it seems that the draft NP is attempting to provide GBC with implicit guidance (albeit again nebulous) in its selection of which areas might be chosen for adding to the settlement area and therefore removing from the Green Belt.</p> <p>It also states support for development that is more or less blanket, and therefore must apply in large majority to Green Belt land, subject to provisos that differ markedly from the constraints of national Green Belt policy. If the draft NP persists with this implicit guidance then it should also make its own assessment of how individual areas within the parish contribute towards the purposes and the character of the Green Belt.</p> <p>The 5 purposes of the Green Belt as identified in the NPPF paragraph 80 are:</p>	<p>The author seems to ignore the fact that if the LP is passed WH will no longer be in the Green Belt.</p> <p>It is wrong and misleading to suggest that the NP approves Green Belt Development.</p> <p>This is incorrect. The NP at no point expressly or impliedly refers to any areas as being suitable for "adding to the settlement area."</p> <p>This is incorrect and therefore the remainder of this paragraph is irrelevant.</p>

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1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The different localities within WH Parish score differently on each of these purposes (although none score at all on purpose 5 of course). For example, the Conservation Area scores highly on purpose 4 in particular. On the other hand, areas 7 & 8 score highly on purposes 1, 2 & 3: the possibility/probability that large built-up development on Wisley former airfield will be approved gives particular importance to restricting any linear northerly growth of WH towards, and in the long-term future potentially merging with, southerly growth of Wisley and Ockham. To be convinced of this danger, note that the 1.32% p.a. compound growth of housing in Guildford Borough envisaged in the draft Local Plan will lead to a doubling of the house numbers in the Borough within 2 generations, 50 years; and an increase by an order of magnitude (i.e. a factor of 10) in only 7 generations. Recall the definition of sustainable development: achieving growth while “ensuring that better lives for ourselves don't mean worse lives for future generations”. There is no limit on the number of generations that is to be considered in this premise. Likewise, the NPPF paragraph 79 defines the essential characteristics of Green Belts as their openness and their permanence. Therefore the 9 defined Areas should also be scored according to the contribution that they make to the openness of the Green Belt.

A first pass to capture these issues by scoring each individual area of the Parish against the 5 purposes of the Green Belt and its contribution to the openness of the Green Belt is given below:

Purpose	Area	1	2	3	4	5	6	7	8	9
1. to check the unrestricted sprawl of large built-up areas;								✓	✓	
2. to prevent neighbouring towns merging into one another.			✓	✓				✓	✓	✓
3. to assist in safeguarding the countryside from encroachment;		✓	✓	✓	✓	✓	✓	✓	✓	✓
4. to preserve the setting and special character of historic towns;						✓				
5. to assist in urban regeneration										
Contribution to openness 1 low; 3 high		3	3	3	2	1	3	3	3	2

If the draft NP retains its current differential policies for individual areas of the Parish then it should include scores along this fashion for the respective contributions that the individual areas make to the Green Belt, since the majority of the Parish will still remain within the Green Belt.

In this respect, it is important to correct the impression that areas 4,7 & 8, to which policy WH2 applies, are not wholly, or even half, within the village settlement, as the title to WH2 states. The converse of this point also applies to policy WH3: areas 1, 2, 3, 6 & 9 are not the only defined areas which are within the Green Belt.

The NP can either omit any differentiation of areas within the Parish and devise, if it can, homogeneous policies for the whole Parish; or it can go the whole hog and examine in detail the merits of each area for development within the constraints of national Green Belt policy, to improve on the attempt by GBC/Pegasus Planning Group in the 'Green Belt & Countryside' Study of ca. 2013. The half-way house in the draft NP just thickens the swamp.

This is incorrect.

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44	<p>Housing density</p> <p>I do not agree with the draft Plan's recommendation that all new development should be at a density of less than 4 houses per acre (10 per hectare). GBC are looking to build a given number of houses, albeit they may change their estimates from the current SHMA. Whatever number they propose, the less density with which that number is built, the more Green Belt land it will occupy. My concern (and that of the NPPF/Government) is to minimise the harm to the openness of the Green Belt within the Parish. Denser dwellings are the lesser of 2 evils in this respect. Furthermore, the lower density is contrary to policy H10 of GBC's Residential Design Guide 2004 which states that "<i>Developments with a density below 30 dwellings per hectare net will not be permitted except where higher density proposals would have an unacceptably detrimental impact on the existing character of the area</i>". The draft Local Plan also looked at the case with 40 dph. The much lower density stipulation in the draft NP will either not survive GBC scrutiny, or else will lead to an area of new development that is about 3-4 times the area proposed in the draft LP. Lower density housing also implies that the houses are likely to be in the higher cost range, and not the affordable or old people's houses that WH genuinely needs. In time, it also may well lead to more subsequent infilling, as owners look to maximise their land value, ending up with a relatively high density in the long run anyway.</p>	<p>Efficient use of land is a national planning policy objective. There is a balance to be struck between this and character. This is a planning judgement and it is not the case that higher density results in poor design. In addition, you get more smaller houses per hectare than you do five-bed executive homes.</p>
45	<p>Wildlife Corridors</p> <p>What is the provenance of the Wildlife Corridors shown in Appendix C? Welcome though they are, surely these are only examples and not exhaustive? Wild animals do not heed trails marked on maps.</p>	<p>Noted. These mapped Wildlife Corridors have been identified by the tracking and noting of wildlife movement by local residents.</p>
46	<p>Completeness in representing 'Community Views on Planning'.</p> <p>Section 4, "Community Views on Planning Issues" should quote ALL of the major results of the 2015 Parish Questionnaire. In particular, it should repeat the findings from Question 13; viz. 86% of the respondents to the questionnaire thought that 100 or fewer additional homes were needed in West Horsley in the next 15 years; and 50% thought that this number should be about 60 or fewer. These are historical facts, just as objective as and more relevant than, say, the current number of homes in the village, or the village's location on the chalk/clay spring line, and certainly much more pertinent than 'There are insufficient bus services in West Horsley'. The NP may not be able to restrict numbers of housing, but at least it can inform Planning Department and developers that extra numbers are against the wishes of a majority of the parishioners. To emphasise only part of the conclusions from the Questionnaire is misleading. Similarly, even though the WH Housing Needs Survey May 2014 is included in the Evidence Base, its main conclusions should be included in the main NP document, to emphasise that numbers of houses above about 40 are also surplus to local WH need.</p>	<p>The author should refer to the evidence appendices which contain this survey.</p> <p>The general opinion of the local community is that there is a requirement for low cost and smaller properties.</p>
47	<p>Development boundary</p> <p>Policy WH4 refers to the 'defined development boundary'. There is no such defined boundary; this should be 'defined settlement area', which currently has a specific meaning, and will continue to have one, whatever GBC decides for its change in the Local Plan.</p>	<p>This is incorrect. Saved Guildford Local Plan policy RE3 (Identified Settlements in the Green Belt) references settlement boundaries and this includes West Horsley.</p>
48	<p>Re: Policy No. __WH1</p> <p>Whilst these policies are well meant, any likely new housing policies will affect new housing development in the Conservation Area (which could happen following 'insetting'. This would affect the character of the village (see Character Appraisal doc) and its setting in the countryside. The openness of the village and surrounding Green Belt, would be substantially altered.</p>	<p>Noted.</p>
49	<p>Re: Policy No. __WH2</p> <p>I fail to see how this cannot affect the fields, openness and Green Belt setting of West Horsley north south east and west!</p>	<p>Noted.</p>

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50	<p>Re: Policy No. ____WH3 Please see comment WH3. The rural character of West Horsley is especially important to all who live and work there and 'insetting' is not allowed if the character and openness is compromised only because of perceived housing need.</p>	Please read our 'What a Neighbourhood Can (and Cannot) Achieve' document.
51	<p>Re: Policy No. ____WH4 Policy WH4 is rejected as the village is washed over the Green Belt and this type of development is not approved.</p>	Please read our 'What a Neighbourhood Can (and Cannot) Achieve' document.
52	<p>Re: Policy No. _WH11 It is good to see these specific places mentioned but I remain to be convinced that any space that can be included in the plans proposed by the prospective Local Plan, is not 'fair game'</p>	Noted.
53	<p>This represents a formidable amount of work and I thank you for your time and efforts. However, I cannot agree with the premise that nothing can be done about housing numbers type and density, along with 'insetting' and green space (Green Belt). Within the context of the parameters (most unfairly and with our hands tied behind our backs), the residents of West Horsley are allowed object to and influence local planning policies properly and democratically arrived at.</p> <p>In addition, whilst I understand why only 5 comments are suggested, this seems hardly sufficient to cover all the relevant areas.</p>	<p>Agreed, the residents can object to the strategic sites in the Local Plan, but the NP cannot do this.</p> <p>Respondee were able to make as many comments as they liked by completing multiple pages of the comments form.</p>
54	<p>Re Policies WH1-WH15 I would like to see running through the entire WHNP, a written commitment to supporting the provisions of Section 9 paras 79-89 of the National Planning Policy Framework (NPPF)2012 and in relation to all of the above WH policies.</p> <p>I would like the plan to state its support, in no uncertain terms, the preservation of the five purposes of the Green Belt because the village of West Horsley is in and surrounded by the Green Belt. Even if the village is (unwisely) inset there is bound to be requests for development on the edges of the village which may have a harmful effect on Green Belt here, to the detriment of the village itself.</p> <p>In each WH Policy there ought to be wording which should read something close to "development will be supported having regard to and giving appropriate weight to Green Belt constraints under national legislation".</p> <p>A commitment to the Green Belt as I am proposing above, would not be inconsistent with the Guildford Local Plan 2003 (current Local Plan Policy for this area) or the proposed submission Guildford Plan 2017 under consultation. Although in my opinion it does not go far enough, the 2017 Local Plan does at least in its preamble commit to preserving the Green Belt.</p> <p>Therefore, I see no reason why the WHNP should not include reference to preserving the openness and permanence of Green Belt. After all nearly all of the Policies are concerned with preserving the rural character, the open views and countryside and natural environment in and around the village. It would provide support to the prevention of development harmful to Green Belt and thereby to the village, in and near West Horsley.</p>	<p>As national policy currently stands a neighbourhood plan cannot alter the Green Belt. This may change (see proposals A.64 of the Housing White Paper – Fixing our Broken Housing Market) but there is no timetable for this yet.</p>

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55	<p>Note 2.2 This states: "One of the distinctive and defining characteristics of the Parish is the relatively low density of housing and the generally open outlook with views into and across open countryside "</p> <p>I would ask that here mention could be made that" the entire village of West Horsley is washed over by the Green Belt." This is fact and until this is changed by a new Local Borough Plan, or law, is the current position. I would like therefore to see this stated and that" proposals for new development in the village would also need to be judged against potential harm to the Green Belt."</p> <p>If GBC are truly committed to preventing over development and other development having the potential to harm the Green Belt and countryside in general, I do not think it would be unreasonable to include such a commitment in the WHNP.</p>	<p><b>NSPG to add the following to WHNP paragraph 2.1: "The Parish is currently washed over by the Green Belt."</b></p>
56	<p>I am grateful to the WHNP team for making such good effort in preparing this neighbourhood plan, however in spite of provisions of management development Policies the plan does not go far enough to protect the village from intrusion and building on the precious green fields and on Green Belt land. In fact, one Policy at least WH5 goes as far as to encouraging development on current Green Belt land near the village. As a resident of West Horsley, I am unable to support this neighbourhood plan because it does not commit to protecting the Green Belt.</p>	<p>The NP cannot influence GBC's decision to inset the settlement areas of the village.</p> <p>The Parish Council, however, is doing all it can to prevent this.</p>
57	<p>Keep Horsley in the Green Belt.</p>	<p>The NP cannot influence GBC's decision to inset the settlement areas of the village.</p> <p>The Parish Council, however, is doing all it can to prevent this.</p>
58	<p>Any new development to be eco-sustainable, modest in size.</p>	<p>Noted.</p>

RESPONSES FROM STATUTORY BODIES	
A	<p><b>Guildford Borough Council</b></p> <p><b>The purpose of this note</b>                      1.1 West Horsley Parish Council has produced a draft neighbourhood plan, upon which it is consulting in order to meet regulation 14 of the Neighbourhood Planning (General) regulations 2012 (as amended). This document constitutes the Council's formal submission for the regulation 14 consultation.</p> <p><b>Background information</b>  <i>The Basic Conditions</i>                      2.1 Neighbourhood Plans must meet the following basic conditions (paraphrased) as originally set out in paragraph 8(2) of schedule 4B to the town and country planning Act 1990 (as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act):</p> <ul style="list-style-type: none"> <li>a. to have regard to national policies and advice contained in guidance issued by the Secretary of State.</li> <li>d. to contribute to the achievement of sustainable development.</li> <li>e. to be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</li> <li>f. to not breach, and is otherwise compatible with, EU obligations.</li> <li>g. to meet prescribed conditions in relation to the Order (or plan) and comply with prescribed matters in connection with the proposal for the order (or neighbourhood plan).</li> </ul> <p>2.2 Basic conditions b and c of the schedule do not apply to neighbourhood plans so are not listed above.</p> <p>2.3 Relevant sources of policy and guidance referred to in basic condition a include the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). The government's view on what constitutes sustainable development (referenced to in basic condition b) is set out throughout the NPPF. The strategic policies referred to in basic condition e include some of the saved policies of the Council's Local Plan 2003 and policy NRM6 of the South East Plan. An assessment setting out which Local Plan 2003 policies should be considered strategic is available to view at <a href="http://www.guildford.gov.uk/neighbourhoodplanninginformation">http://www.guildford.gov.uk/neighbourhoodplanninginformation</a>.</p> <p>2.4 An online version of the 2003 Local Plan proposals (policies) map can be accessed at:<a href="http://www.guildford.gov.uk/planningmap">http://www.guildford.gov.uk/planningmap</a></p> <p><i>New local plan and evidence base</i>                      2.5 The Council is currently producing a new Local Plan and has produced a body of evidence to inform that process. The Council issued the Proposed Submission Local Plan Strategy and Sites for consultation in June 2017.</p> <p>2.6 Basic condition a requires neighbourhood plans to have regard to the NPPF and NPPG. NPPF paragraph 184 includes the following requirement:</p> <p><i>"The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area"</i></p>

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<p>2.7 The strategic needs and priorities for the wider local area are set out in the evidence base for the new local plan, and within the new local plan itself. The ambition of the neighbourhood plan should be to assist in meeting these needs, including the significant need for an improvement in the supply and affordability of housing.</p> <p>2.8 The NPPG (Neighbourhood Planning, paragraph 9) adds the following:</p> <p><i>“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.”</i></p> <p>2.9 The Council has produced the West Surrey Strategic Housing Market Assessment, updated in 2017, which provides up-to-date evidence of housing need:</p> <p><a href="http://www.guildford.gov.uk/newlocalplan/shma">http://www.guildford.gov.uk/newlocalplan/shma</a></p> <p><b>General comments about the neighbourhood plan</b></p> <p>3.1 Please ensure maps and images in supporting documents are accompanied by the appropriate copyright information (e.g. the map on page 3 of the West Horsley Character Appraisal).</p> <p><b>Section 2 Neighbourhood Area</b> 2.2-2.3</p> <p>3.2 The text states that the average residential densities are 9.9 dwellings per hectare (dph) for the northern settlement area and six dph for the southern settlement area. The methodology and calculation is set out in the West Horsley Character Appraisal Report.</p> <p>3.3 There is no standard methodology for calculating density, but a typical approach is to calculate the size of an area excluding roads (possibly except very minor roads) and areas of public open space (except small amenity areas and landscaping) and dividing the number of dwellings within the boundary by the number of hectares. If this approach is used, both the northern and southern settlement areas range up to around 25 dph. The figures of 9.9 and six dph sound extremely low and could be misleading for people considering development proposals.</p> <p><b>Section 3 Planning Policy Context</b> <i>Map: Proposed Submission Local Plan: Strategy and Sites 2016</i></p> <p>3.4 The Proposed Submission Local Plan: Strategy and Sites 2017 Borough Overview map contains minor changes over the 2016 map. The 2016 map in the plan could be <u>updated with the newer 2017 map</u>.</p> <p>3.5 If required, the Council can <u>provide a map showing an area more focused around the West Horsley Neighbourhood Area</u>.</p> <p><b>Policy WH1 West Horsley Conservation Area</b></p> <p>3.6 The policy seeks to preserve the character of the Conservation Area, the Council fully supports. There are cases where the Council is presented with contemporary designs and materials which it may be appropriate to encourage, and which can build on the diverse range of styles mentioned in the policy. The most important factor is seeking high quality, good design of appropriate scale, height and form, and high quality materials. The policy does not seem to address contemporary design or materials, or heights scale and forms.</p>	<p><b>3.1. We will do.</b></p> <p><b>NPSG to ensure that density figures in 2.2 and 2.3 are accurate and justified.</b></p> <p><b>NPSG to prepare a Density Background document to support density figures and policies.</b></p> <p><b>3.4. Map to be updated.</b></p> <p><b>3.5. Map to be included in Plan.</b></p> <p>WH1</p>
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<p><i>Point ii</i> 3.7 Point ii could reflect the matters raised in the paragraph above more clearly to embrace all types of high quality design. Point ii could be amended along the following lines:</p> <p><u><i>“ii) Buildings should be of good design and use of high quality materials. Scales, heights and form of buildings should be sympathetic to the existing built environment. They should seek to include the use of locally used and prominent materials such as natural clay red bricks, roof and tile hanging, timber weatherboarding, roughcast render and knapped flint.”</i></u></p> <p><b>Policy WH2 Design Management in the Village Settlement</b> <i>Point i</i> 3.8 The phrase “an attractive rural edge” is somewhat ambiguous and subjective. It may be difficult for people working on development proposals to understand what is required, and for planning decision takers to understand whether the requirement has been met. It is suggested that more detailed requirements should be set out in the policy, or that the phrase is defined in the supporting text.</p> <p><i>Point iii</i> 3.9 This sentence could be written more clearly, potentially as follows (changes underlined).</p> <p><u><i>“East of The Street, proposals should conform to the existing stronger building line regarding frontages and building height and form”</i></u></p> <p><i>Point iv</i> 3.10 Point iv limits all new dwellings to one and two storey homes with gardens to the front and rear, and resists the development of single storey development into two or more story homes. This requirement is highly prescriptive.</p> <p>3.11 The Council is concerned that the blanket restriction may be unenforceable in many situations. For example, it will be difficult to justify refusing permission to extend a bungalow upwards if it is already adjacent to buildings of two storeys or greater. Such a policy would therefore cause problems and delays during the development management process.</p> <p>3.12 The borough has a very high housing need. Extending smaller homes can often be an affordable way for families to provide for their needs in an area where high house prices means that moving house may not be an option. The Council’s Strategic Housing Market Assessment identifies the need for a mix of homes and is concerned that a blanket restriction on the type of homes that can be built will not assist the delivery of the mix of homes needed. This requirement is therefore not aligned with the strategic needs of the wider local area and consequently does not meet basic condition a.</p> <p>3.13 Given the issues raised in the paragraphs <u>above</u>, the Council objects to point iv.</p> <p>3.14 The desire to retain bungalows and concern over inappropriately scaled development is understood. It is suggested that the character of the area can be protected more effectively through appropriate design policies, rather than blanket prohibitions on a particular type of development.</p> <p>3.15 Single storey dwellings (bungalows) are not an efficient use of land or a sustainable form of development and therefore this requirement may not have had regard to paragraph 58 of the NPPF, which requires neighbourhood plan policies to optimise the potential of sites to accommodate development. This would therefore not meet basic condition a. In order to pass examination, the neighbourhood plan will need to present proportionate and robust evidence that demonstrates to the examiner that this is both necessary and reasonable.</p>	<p><b>3.7 (ii) NPSG to amend.</b></p> <p>WH2</p> <p><b>3.8. NPSG to further define “attractive rural edge” in supporting text.</b></p> <p><b>3.9 Yes, will do.</b></p> <p><b>3.10 &amp; 3.11 NPSG to provide further supporting evidence to justify retention of ‘single storey’ requirement.</b></p> <p><b>3.13 – 3.15. NPSG to draft an additional paragraph of supporting text to justify the retention of bungalows in the village.</b></p>
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<p><i>Point x</i></p> <p>3.16 The requirement for off-street parking provisions to be “<i>sympathetic to visual and physical impact</i>” is somewhat vague and does not make it clear what developments should achieve or avoid. Planning decision makers may find it difficult to apply this requirement in the way intended by the policy. The supporting text could provide guidance to make the requirement clearer, or potentially refer to existing guidance. There is some consideration of the design of off-street parking in the Surrey Design Guide, but further guidance may be available:  <a href="https://www.surreycc.gov.uk/environment-housing-and-planning/planning/introduction-to-town-and-country-planning/development-plans">https://www.surreycc.gov.uk/environment-housing-and-planning/planning/introduction-to-town-and-country-planning/development-plans</a></p> <p><i>Final Paragraph</i></p> <p>3.17 Please explain what “SANG” refers to for the benefit of the reader (Suitable Alternative Natural Greenspace). <u>The text could refer to policy NRM6 of the South East Plan, or the Council’s Thames Basin Heaths Special Protection Area Avoidance Strategy SPD.</u></p> <p><b>Policy WH3 Design Management within Rural Areas</b></p> <p>3.18 The policy is named “Design Management within Rural Areas” but the first sentence refers to all development proposals. It is suggested that the first sentence should be amended to read “<u>Development proposals within rural areas will be supported provided...</u>”. Alternatively, the character areas identified in the supporting text at 5.20 could be included in the policy, as with WH2.</p> <p>3.19 The Council objects to point v where it restricts the enlargement of dwellings for the reasons set out in 3.10 onwards.</p> <p><b>Policy WH4 Housing Mix</b></p> <p>3.20 The opening sentence is not clear and it is suggested that the following amendment should be made for clarity (amendment underlined): “<u>Proposals for new residential development within the defined settlement boundary of West Horsley will be supported, provided they have had full regard to the need to deliver the following housing types:...</u>”.</p> <p>3.21 The Council objects to the wording of the affordable housing policy which implies that starter homes must be provided as part of the affordable housing on sites. This undermines the Council’s housing strategy because our priority is rented affordable housing, as this form of housing most accurately reflects the needs of those on the housing register. However, if developers wish to provide starter homes in addition to the affordable housing on a site, the Council would have no objection. As currently written, the ambition of the policy is not aligned with the strategic needs of the wider local area and thus does not meet basic condition a.</p> <p>3.22 Government policy is not clear yet on whether starter homes should be part of the affordable housing on a site. The definition of affordable housing, at the time of writing, does not include starter homes, but this may change. The policy instead could refer to “<u>affordable housing as defined nationally</u>” or similar to allow for changes in national policy.</p> <p>3.23 Given the emphasis on young families, young adults looking to set up their first home, older households looking to downsize and affordability, it is suggested that there should also be an emphasis <u>on one-bedroom market homes</u>, as opposed to only two and three bed homes. If there is evidence that one bed homes are not needed in the area, or other reasons for not providing them, this should be explained in the supporting text to provide justification.</p>	<p><b>3.16. NPSG to rephrase policy (x) to make it clearer what developments should achieve/avoid.</b></p> <p><b>3.17. Yes, will do.</b></p> <p>WH3</p> <p><b>3.18. Yes, will do.</b></p> <p><b>3.19. NPSG to provide further supporting evidence to justify resistance to smaller properties on large plots being replaced with large homes.</b></p> <p>WH4</p> <p><b>3.20. Yes, will amend.</b></p> <p><b>NPSG to add the following to supporting text: The Housing White Paper confirmed that the government will not introduce a statutory requirement for starter homes at the present time.</b></p> <p><b>3.22 NPSG to amend as suggested.</b></p> <p><b>3.23. NPSG agrees one-bed market homes should be included in this policy.</b></p>
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<p><b>WH5 Rural Exception Housing</b>  <i>Viability and land value</i>            3.24 WH5 allows the inclusion of up to 30% market housing on rural exception sites, subject to a viability appraisal which demonstrates the need for this. The Council would like to see this strengthened to explicitly say that a scheme will not be regarded as unviable if the land value has been inflated above the value paid for rural exception affordable housing. In the Council's emerging Local Plan policy H3 (paragraph 4.2.53) we set a limit on land value for Rural Exception sites of no more than 10 times agricultural value. The plan should be aligned with this approach by adding a sentence to the supporting text along the following lines:</p> <p><u><i>"It should be noted that in the case of land which would not normally be given permission for housing but is brought forward for local needs affordable housing, landowners cannot expect to realise the full market rate for their land. Guildford Borough Council indicates that the value of rural exception land should not exceed 10 times agricultural value."</i></u></p> <p><i>Local connection</i>            3.25 It is not clear from the local connection hierarchy within the policy (second to last paragraph) at which point the rural exception housing will be offered to people outside the parish and adjacent parishes. If a vacancy arises, and there are no eligible people within the parish, or in an adjacent parish, it would not be appropriate to leave homes standing empty while there are people in other parts of the borough in housing need. If the current wording is retained, <u>the council would like " , and then, people in housing need in the wider local area"</u> added to the second to last paragraph.</p> <p>3.26 The plan goes into detail on what constitutes a local connection but the Council's view is that it should either use a broader definition such as <u>"people with a demonstrable connection to the village, by family, employment or residence"</u>, or, if a more detailed approach is retained, it should cover more of the specific issues that can arise; for example, the policy does not specify how long a family member would have to have resided in the village for an applicant to establish a local connection; does not specify whether a sibling would count; and it should be noted that children do not normally count unless they are adult children. We suggest using the text from the Council's allocations policy which is:</p> <p><u><i>"On Rural Housing Exception Schemes, allocations must take account of the planning condition that the housing is provided to meet local housing need. On such schemes, properties will be offered to those applicants that have a local connection and who are in the greatest housing need.</i></u>  <u><i>Local connection for this purpose can be established if the applicant</i></u></p> <ul style="list-style-type: none"> <li><u><i>o is living in the village or parish at present, or</i></u></li> <li><u><i>o is employed in the village or parish at present, or</i></u></li> <li><u><i>o was born and brought up in the village or parish but now lives elsewhere, or</i></u></li> <li><u><i>o has close family within the village or parish, for example, mother, father, brother, sister.</i></u></li> </ul> <p><u><i>Length of residence or employment is taken into account and priority given to those with the greatest connection. If there are no suitable applicants in the village or parish then applicants from the next neighbouring parish(es) can be considered on a concentric circle basis.</i></u></p> <p><u><i>In special cases where an applicant needs to remain in a village or where an applicant, with a longstanding local connection with a village or parish, had to move elsewhere, they would normally be preferred over another applicant who was not connected with the village or parish."</i></u></p>	<p>WH5</p> <p><b>3.24. NPSG to add comment to supporting text.</b></p> <p><b>3.25 NPSG to amend as suggested.</b></p> <p><b>NPSG to add 'Local Connection Statement' to supporting text.</b></p>
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<p>3.27 As background to these comments we think it would be helpful to provide more detail about how we define and apply local connections.</p> <p>3.28 A local connection is defined by reference to s199 Housing Act 1996. A person has a local connection because</p> <ol style="list-style-type: none"><li>i. of normal residence in the borough (either current or previous) and that residence was of his own choice,</li><li>ii. they are employed within the borough</li><li>iii. of family connections or</li><li>iv. of special circumstances.</li></ol> <p>3.29 The Council's Housing Allocation Scheme differentiates between applicants that have a 'long and substantial' local connection from those that have a lesser local connection. Applicants with a lesser local connection will normally be awarded a lower priority for the allocation of housing than those with a long and substantial local connection.</p> <p>3.30 A 'long and substantial local connection' is established if an applicant:</p> <ul style="list-style-type: none"><li>• has lived within the borough for over three years continuously, or</li><li>• has a permanent job and has worked within the borough for more than two years and continues to do so (not necessarily in the same job), or</li><li>• has a close relative (mother, father, brother, sister or adult children) living within the borough and the relative has lived within the borough continuously for more than five years, or lesser local connection is established if an applicant:<ul style="list-style-type: none"><li>• has lived in the borough for six months out of the last 12, or</li><li>• has a permanent job in the borough for less than two years</li></ul></li></ul> <p>3.31 The local connection must be maintained throughout the period of the application up to and including the allocation process and sign-up of a tenancy.</p> <p>3.32 Where the above refers to 'the borough' this could instead refer to 'the parish' on Rural Exception sites.</p> <p><i>Housing need</i></p> <p>3.33 The policy does not make it explicit that affordable housing will only be provided to those in housing need. It should specify that affordable homes will be allocated to people who are eligible for affordable housing, in order to ensure that people with no identified housing need will not be allocated a property simply because they have a stronger local connection than someone in housing need who has a weaker local connection. For clarity, as long as an applicant has some level of housing need, under the terms of this policy, local connection will have priority over all other considerations that would normally apply to prioritising applicants on the register.</p> <p>3.34 The criteria for housing need in WH5 should accord with the criteria in the Council's housing allocations policy, and make sure that anyone allocated affordable housing is on the Council's housing register, or is eligible to be on it. <u>A sentence should be added to WH5 iv) which states "People allocated an affordable home will meet the criteria for eligibility for affordable housing set out in the Council's published Housing Allocations Scheme for rented or low cost home ownership housing as appropriate".</u></p> <p>Please see <a href="https://www.guildfordhomechoice.org.uk/NovaWeb/Infrastructure/ViewLibraryDocument.aspx?ObjectID=35300">https://www.guildfordhomechoice.org.uk/NovaWeb/Infrastructure/ViewLibraryDocument.aspx?ObjectID=35300</a></p>	<p><b>3.34. NPSG to add sentence as suggested.</b></p>
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<p><b>Policy WH11: Local Green Spaces</b>  3.35 The following two proposed local green spaces are owned by the Council:  <ul style="list-style-type: none"> <li>• Recreation area at Nightingale Crescent</li> <li>• Recreation area at Farleys Close</li> </ul> 3.36 The Council objects to with the proposal for the recreation area at Farleys Close to become a Local Green Space. Although there are no current plans to develop the land, the Council, as landowner, wishes to keep this option open should there be a need to redevelop in the distant future. There are options for re-provision of green space nearby should the current recreation area be developed.</p> <p>3.37 The supporting text references “the Council’s Open Spaces, Sport and Recreation Assessment (June 2016)”. This has been updated and should be referred to as the “Open Space, Sport and Recreation Assessment 2017”.</p> <p><b>WH12 Green and Blue Infrastructure</b>  3.38 The policy includes footpaths, bridleways and cyclepaths in the definition of green and blue infrastructure. It may benefit from being tied more closely to the key objective at paragraph 5.1 <i>“To promote better transport links within, and to and from, West Horsley, including encouraging more families and children to be able to walk and/or cycle to and from school, rather than being reliant on motor transport.”</i> The plan at 4.3 also states that residents rarely use cycling as a form of transport. This is an issue that could be addressed directly by the policy, and identifying this issue can be used as evidence of the need to improve the cycle network in the supporting text.</p> <p>3.39 The policies map designates a number of wildlife corridors. The wildlife corridors have a width of around 45 metres, but close-up maps are not provided that show clearly where the boundaries of the corridors are. If adopted, this lack of clarity would introduce ambiguity into planning decisions.</p> <p>3.40 The way the policy treats the wildlife corridors suggests that they are intended to be routes, rather than areas of land, and that the exact locations of the corridors are not important, but rather that is important that routes in these broad locations are maintained. If this is the case, the supporting text could helpfully set this out for clarity in planning decisions. If the corridors are intended to be tied to the specific land boundaries shown on the map, close-up maps must be provided to show clearly where the designation applies. Generally, it is helpful if designations follow physical features.</p> <p>3.41 It is noted that the plan proposes to designate a number of wildlife corridors, one of which (WC07) runs through emerging local plan site A38, proposed to provide approximately 135 homes. The emerging local plan identifies green corridors as an opportunity for the site. However, the corridor identified on the WHNP map appears to cover a significant portion of the site and could therefore constrain housing delivery. If the plan is not amended to clarify that the corridors are routes rather than areas of land (see 3.40), it is important that robust and proportionate evidence is produced to support the designation. Should the designation constrain delivery of housing without adequate justification, the Council will likely object to this policy during the examination as it would not be aligned with the strategic needs of the wider local area as required by paragraph 184 of the NPPF and basic condition a.</p> <p><b>WH13 Sustainable Urban Drainage</b>  3.42 The policy requires developers to consider whether the development will overwhelm the waste water infrastructure. In order to inform the emerging local plan, the Council has commissioned a Water Quality Assessment that looks at the impact of development proposals on waste water infrastructure capacity. Additional studies may therefore become superfluous.</p> <p>3.43 The study is likely to be published prior to summer 2017.</p> <p><b>WH14 Biodiversity</b></p>	<p>WH11</p> <p><b>3.36. NPSG has agreed to delete Farleys Close from Plan.</b></p> <p><b>3.37. NPSG to amend.</b></p> <p><b>3.38. NPSG to re-word Policy to tie more closely with objective in 5.1.</b></p> <p><b>3.39. NPSG to ask GBC to re-produce map with thin lines - to indicate that corridors are routes rather than areas of land.</b></p> <p>WH13</p> <p>WH14</p>
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	<p>3.44 It is suggested that the wording in the policy should be changed as follows (changes underlined):</p> <p><i>"In imposing landscaping conditions to secure biodiversity benefits including tree and/or hedge planting, <u>developers are required to include in their schemes the planting of...</u>"</i></p> <p>END</p>	<p><b>3.44. NPSG to amend as suggested.</b></p>
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<p>B</p>	<p><b>Surrey County Council - Environment &amp; Infrastructure Directorate</b></p> <p>Surrey County Council welcomes the opportunity to respond to the East Horsley Neighbourhood Plan. Our comments reflect the county council's role as the authority responsible for education and transport. We therefore have comments on the Neighbourhood Plan relating to these topics as set out below.</p> <p><b>Policy WH7: Educational Provision page 32</b>          We would expect school sites to be appropriately located so as to realistically enable children to access the school by a range of means of transport. Sites should be accessible by foot, bicycle and scooter in addition to car. Any additional infrastructure necessary to support these alternative modes of travel to the car should be provided as part of any relocated school development. Car parking for staff and parking for cycles and scooters should be provided as part of any redevelopment.</p> <p>Policy WH7 appears to implicitly cover these points. It would be helpful if the policy could be more a little more explicit with regard to these requirements or if, alternatively reference to the need for these facilities could be included in the text supporting Policy WH7.</p> <p><b>Policy WH11: Local Green Space</b>          We were informally consulted earlier this year by West Horsley Neighbourhood Steering Group with regard to the proposed designation as Local Green Space (LGS) of sites 10 to 15 listed in Policy WH11, which are owned by the county council. In response we indicated that we would not support this element of the policy for the reasons set out below. Sites 10 to 15, listed in Policy WH11, are small areas of land in the county council's ownership, considered to be unsuitable for any development other than highway improvements. It is not currently envisaged that any of these sites will be required for such schemes, but it would not be possible to say with 100% certainty that any of them would be not ever be needed in the future. Any improvements would be required for safety reasons or to alleviate traffic congestion on the road network and designation as LGS would effectively present an unnecessary barrier to their implementation. We consider proposals for the designation of county owned highway verges for LGS to be inappropriate and we therefore do not support the inclusion of sites 10 – 15 in the list of sites proposed to be designated as Local Green Space in Policy WH11.</p> <p>Should you have any queries on this response please contact Kath Harrison by telephone on 0208 541 9453 or by email: <a href="mailto:kath.harrison@surreycc.gov.uk">kath.harrison@surreycc.gov.uk</a></p> <p>Yours sincerely          Katharine Harrison Principal Spatial Planning Officer Spatial Planning Team</p>	<p><b>WH7 – NPSG believes the Policy already covers most of these comments – however the following wording will be added to the effect: “The Plan notes SCC’s expectations regarding school sites and we endorse these”.</b></p> <p>NPSG has been in contact with Kath Harrison again to discuss sites 10-15. She concludes that we should leave them in.</p> <p>The NPSG notes that SCC does not support the inclusion of Sites 10-15, however, these sites are felt to be intrinsic to the local character of West Horsley and we have continued to include them on the understanding that access for any essential highway maintenance is acceptable to the Parish.</p>
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<p>C</p>	<p><b>Surrey County Council Heritage Conservation</b></p> <p>I am writing to you regarding the historic environment as I have recently become aware that your area is involved in the Neighbourhood Planning process, and that the production of a Neighbourhood Plan for your area is currently under consultation.</p> <p>By way of an introduction; I am the manager of Surrey County Council’s Heritage Conservation Team, which is based at County Hall in Kingston. The team provides advice and guidance relating to the historic environment to the 12 planning authorities of Surrey, as well as hosting and providing for the maintenance of the Surrey Historic Environment Record (HER). The HER is a comprehensive catalogue of information about the heritage assets of the County, and contains information relating to all the designated sites - Scheduled Monuments, Listed Buildings, Registered Parks and Gardens – as well as non-designated heritage assets such as archaeological sites, locally listed structures, heritage landscape features, historic boundaries, artefact findspots, and the results of archaeological investigations (including where these have proven negative). We provide access to the HER to developers, researchers, academics and the general public, and offer heritage-related management, protection and enhancement advisory services to the wider community over and above that relating to specific development.</p> <p>We are keen to strengthen the relationships between the various communities of Surrey and the heritage protection bodies of the county (including ourselves), with the ultimate goal of enhancing the conservation and management of the local historic environment resources. I am hopeful that you will be interested in accommodating greater consideration of your area’s physical heritage assets and resources within the developing neighbourhood plan. During the process of producing the plan we are also hoping to foster a greater understanding and appreciation of the heritage of the area within the local community, with the eventual aim of encouraging more proactive monitoring and stewardship of local heritage assets by the community itself, and an enhanced regime of protection measures for valued features, sites and monuments overall.</p>	<p>NPSG to obtain PDF copies of all the lists and maps held on file by SCC Heritage Conservation and add to the Evidence Base.</p>
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<p>As a demonstration of some of the information that we have that you might find useful, I have attached a copy of a map of the West Horsley area, overlain with details of the locations of the local and national archaeological designations, HER entries, and Conservation Areas. We do hold additional information regarding historic rural and urban landscape survey, archaeological excavation results, historic maps, listed buildings' information and the full HER database itself, although this is often extensive and time-consuming to compile and in some cases requires professional interpretation before it can be disseminated, so I have not included it here. I have however included summary HER entries for the references on the maps.</p> <p>I realise that this submission is perhaps a little late in the process – we are often not informed by the relevant District and Borough Local Planning Authorities if and when areas start the process of producing neighbourhood plans, and unfortunately some of these have not been picked up at a particularly early stage. I also note that the current consultation draft does already contain significant appreciation of heritage assets in the area including Listed Buildings and Conservation Areas, which is welcomed. However, I hope this information is of use to you. If you would like a more comprehensive overview of the heritage resources of your area to inform any forthcoming version of the neighbourhood plan, or wish to discuss further how our information and advisory capabilities might assist its compilation, please contact me. In addition, we are also offering all neighbourhood planning groups across Surrey the opportunity to meet with us on an individual basis and discuss the plan and the historic environment at a mutually convenient time, and arrange for the HER to be accessible at the same time. There would be no charge for either the data or any advice or visits to our offices: we seek only to ensure that the county's historic environment is adequately considered and accommodated throughout the planning process, of which the neighbourhood planning regime will be a part in the future.</p> <p>I wish you well in your endeavours and look forward to hearing from you.</p> <p>Yours sincerely</p> <p>Tony Howe Heritage Conservation Team Manager</p>	
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<p>D</p>	<p><b>Environment Agency</b></p> <p>Thank you for consulting the Environment Agency about the pre-submission neighbourhood plan for West Horsley.</p> <p>The Environment Agency aims to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p>Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:  <a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a></p> <p>The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites.</p> <p>Yours faithfully          Judith Johnson Sustainable Places team          Direct dial 020 3025 9495 e-mail: <a href="mailto:planning-THM@environment-agency.gov.uk">planning-THM@environment-agency.gov.uk</a></p>	<p><b>NPSG to review joint advice on neighbourhood planning and to add to evidence base.</b></p>
<p>E</p>	<p><b>Natural England</b></p> <p>Thank you for your consultation on the above dated 20th June 2017.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.</p> <p>In our review of the West Horsley Neighbourhood Plan we note that there are designated sites and protected landscapes within the Neighbourhood Plan area but the Plan does not allocate any additional sites for development. Nevertheless, we are aware that <u>the Southern half of the Parish lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB), and the remainder lies within the setting. Therefore it is required that any new development within the Parish conducts a Landscape Visual Impact Assessment (LVIA). We strongly recommend incorporating an additional policy relating to mitigating the potential Landscape impacts of development, which should include a requirement for new developments to conduct an LVIA.</u></p> <p>We would also like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the</p>	<p><b>NPSG to incorporate requirements for a Landscape and Visual Impact Assessment within Design Management Policies as requested.</b></p> <p><b>WH14:</b></p> <ul style="list-style-type: none"> <li>- <b>NPSG to add working as suggested.</b></li> <li>- <b>NPSG to add a Section 40 statement to supporting text.</b></li> </ul>

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	<p>National Planning Policy Framework). <u>Please ensure that Policy WH14 in your plan includes wording to ensure that "all development results in a biodiversity net gain for the parish".</u></p> <p>The recently produced Neighbourhood Plan for Benson, in South Oxfordshire provides an excellent example. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplary. We recommend that you consider this document, when reviewing yours.</p> <p>Furthermore, we note and approve of the effort that has been invested in identifying potential wildlife corridors between existing designated sites within the Parish. Whilst we understand that Policy WH12 contains a requirement for developers to demonstrate how existing green and blue infrastructure networks will be enhanced, we would like to suggest the incorporation of an additional CIL project in Section 6.4 pertaining to the creation and enhancement of these corridors.</p> <p>We also recommend a minor addition to Policy WH13 to incorporate wording relating to a requirement for developers to demonstrate that additional wastewater discharge resulting from development will not result in significant impacts to aquatic biodiversity, which is sensitive to decreased water quality.</p> <p>Further Recommendations</p> <ul style="list-style-type: none"> <li>• Policies relating to Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;</li> <li>• Development sites should be assessed for 'Best and most versatile (BMV) agricultural land' (Grades 1-3a). Policies around the mapping of land proposed for development should be included in the Plan. Loss of this resource must be avoided. Please see Annex A for further information.</li> </ul> <p>Yours sincerely, Chris Baines Sustainable Development Adviser Thames Team</p>	<p><b>NPSG to re-word Policy as follows: Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. Developers will also be required to demonstrate that additional waste water discharge resulting from the development will not result in significant impacts on aquatic biodiversity. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of the existing waste water infrastructure and detrimental effects on water quality and aquatic biodiversity.</b></p>
F	<p><b>East Horsley Parish Council</b></p> <p>East Horsley Parish Council has now reviewed the Pre-Submission version of the West Horsley Neighbourhood Plan of June 2017 and have no comments to make on your proposed plan. We wish you and your colleagues a successful consultation.</p>	<p>Thank you.</p>

<p>G</p>	<p><b>Punch Partnership (PTL) Limited</b></p> <p><b>Proposed designation as Community Facility, Local Building of Historic Interest and Local Green Space</b>  <b>The Barley Mow, 181 The Street, West Horsley, KT24 6HR (the Property)</b></p> <p>We act for Punch Partnership (PTL) Limited who are the freehold owner of the above Property shown edged red on the attached plan.</p> <p>We understand that the pre-submission version of the West Horsley Neighbourhood Plan was approved by West Horsley Parish Council on 16 May 2017 and that the West Horsley Neighbourhood Plan is now undergoing a period of consultation pursuant to the Neighbourhood Planning (General) Regulations 2012.</p> <p>As a non-statutory consultee, our client wishes to formally object to the proposed designation of the beer garden associated with the Property (the Beer Garden) as an area of Local Green Space on the following grounds:</p> <p><b>NPPF Criteria</b></p> <p>1 Any site proposed to be designated as Local Green Space must meet the criteria set out in Paragraph 76, 77 and 78 of the National Planning Policy Framework (NPPF). Any such proposal must be supported by robust and objective evidence demonstrating that the requirements of the NPPF have been satisfied.</p> <p>2 The threshold for satisfying the tests in Paragraphs 76-78 of the NPPF is high. Designation as Local Green Space is an exceptional designation. The NPPF is clear in stating that the Local Green Space designation is a 'special protection' that will 'not be appropriate' for most green areas or open space. Paragraph 78 confirms the restrictive</p>	<p>NPSG has agreed to delete The Barley Mow from WH11.</p>
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	<p>nature of the designation by requiring that local policy for managing development with a Local Green Space should be consistent with policy for Green Belts.</p> <p><i>Paragraph 76</i></p> <p>3 The NPPF provides the following information on Local Green Space designation:</p> <p><i>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.</i></p> <p>4 Policy RE3 of the Guildford Borough Local Plan supports the principle of new housing in this area. Policy RE3 states that new building will be permitted in the nature of infilling on land substantially surrounded by existing development for the developments referred to in Policy RE2 and for: 'development of a small gap in an otherwise continuous built up frontage of appropriate scale and design; for small scale housing developments appropriate to the scale of the locality and for community or employment facilities appropriate to the scale of the settlement'. Designation of the Beer Garden as a Local Green Space in the Neighbourhood plan would therefore be inconsistent with existing local policy.</p>	
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	<p>5 Designation would also clearly be at odds with the sustainable development objectives of the NPPF.</p> <p>6 In addition to the above, planning permission with reference 16/P/02471 was granted on 9 May 2017 for the development of a large part of the Beer Garden for the construction of a new 4-bedroom detached house with associated fencing, access and parking. National Planning Practice Guidance states that Local Green Space designation will rarely be appropriate where the land has planning permission for development.</p> <p>7 In light of the above and on the basis that designation as Local Green Space is incapable of enduring beyond the end of the plan period given the grant of planning permission, the test at paragraph 76 cannot be properly met.</p> <p><i>Paragraph 77</i></p> <p>8 The NPPF provides at Paragraph 77 that:</p> <p><i>77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p>	
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	<ul style="list-style-type: none"> <li>● <i>where the green space is in reasonably close proximity to the community it serves;</i></li> <li>● <i>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li>● <i>where the green area concerned is local in character and is not an extensive tract of land.</i></li> </ul> <p>9 The Beer Garden is a flat, grassed area containing a couple of small trees, some wooden tables and seating and is separated from the building at 181 The Street by a wooden fence. It is surrounded on three sides by other buildings and on one side by a public highway. Clearly by its location it does satisfy the proximity test of paragraph 77.</p> <p>10 There is no evidence to suggest that the Beer Garden is demonstrably special to the local community or that it holds any particular local significance and as such it does not meet the second test at paragraph 77.</p> <p>11 The Beer Garden has no obvious visual amenity value, being surrounded by other properties and the public highway; it is not listed and has no obvious historically valuable features. The Beer Garden holds no recreational or sporting significance and is not a place of particular tranquillity or richness of wildlife. There is no designation which would indicate that the Beer Garden is in anyway special or significant. It is simply a garden for the use of patrons of the Property.</p>	
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	<p>12 The draft Neighbourhood Plan states that "An important local asset of community value, the Beer Garden is extremely popular during the summer months (informal recreational value) and being central to the community it serves, can easily be reached by foot or bicycle from all areas of the village". It is key to note that, the Beer Garden is not open to the public for use for recreation but rather is purely for use by patrons of the Barley Mow. Further, despite being described as "an important local asset of community value" the Property has not been nominated or listed as such under the Localism Act 2011.</p> <p>13 On the basis of the above, Paragraph 77 of the NPPF cannot be satisfied.</p> <p><i>Paragraph 78</i></p> <p>14 The NPPF provides at Paragraph 78 that:</p> <p><i>78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.</i></p> <p>15 The Property lies within West Horsley, an identified settlement area of the Green Belt. The Property is also within the 400m-5km buffer zone of the Thames Basin Health Special Protection Area.</p>	
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	<p>16 The inclusion of the Beer Garden as a Local Green Space seeks therefore to replicate the function of the Green Belt and has the intention of prohibiting development in a sustainable location.</p> <p>17 The Neighbourhood Plan identifies that there is a new draft Guildford Borough Council Local Plan which is in an advanced stage and is currently being consulted upon.</p> <p>18 The draft Guildford Borough Council Local Plan proposes to inset the village of West Horsley from the Green Belt. It states that 'we consider exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development'. It goes on to state that 'land has been removed from the Green Belt in order to enable development around the Guildford urban area, selected villages, and at the former Wisley airfield.'</p> <p>19 It is incumbent on the Neighbourhood Plan to support the strategic development needs set out in the Local Plan and the emerging draft Guildford Borough Council Local Plan and to plan positively to support local development as outlined in paragraph 16 of the NPPF. The existing Local Plan has a Green Belt policy. Additional designation as Local Green Space at the present time is therefore unnecessary and would serve no useful purpose.</p> <p>20 Turning to the emerging Local Plan, it is clear from the strategic priorities set out in the emerging Local Plan that it would be inappropriate for the Neighbourhood Plan to attempt to use designation as a Local Green Space to impose Green Belt type protection on land in circumstances where such land has intentionally been removed from Green Belt policy in the emerging Local Plan in order to promote sustainable development.</p>	
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	<p>Please treat this letter therefore as a formal objection to the designation of any part of the Property as Local Green Space and ensure that this objection is taken into consideration during the consultation process.</p> <p>Please acknowledge receipt of this letter.</p> <p>Yours faithfully</p> <p>TLT LLP</p>	

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RESPONSES FROM OTHER CONSULTEES		
H	<p><b>Squires Garden Centre</b></p> <p>On behalf of D.J. Squire &amp; Co Ltd trading as Squire's Garden Centres we should like to make the following representations on the draft West Horsley Neighbourhood Plan.</p> <p>We are a family owned business which has been trading for over 80 years and we were very pleased to acquire our garden centre in Epsom Road West Horsley in 1996. We have very much enjoyed being part of the community in West Horsley ever since. We are grateful for the support we receive from local people and we do our best to provide high quality plants and gardening products in a relaxed and friendly shopping environment together with our garden centre restaurant. We very much see ourselves as serving the local community and being an active part of the community. We are a community facility in a similar way to many of those listed in policy WH6.</p> <p>We believe that local employment opportunities and the opportunity to shop and enjoy leisure pursuits locally are important for the wellbeing of local communities, their long-term sustainability and the protection of the environment by reducing the need to travel very far.</p> <p>We fully endorse the aim of the Parish Council 'To support the retention and development of local businesses and employment opportunities in order to meet the needs of the community' at point 5.1 of the Key Objectives. This may need to include some development on existing employment sites to retain them as viable and flourishing sources of local employment.</p> <p>We should also like to endorse policy 5.48.</p> <p>'The Parish Council considers it essential to the continued and growing health and vitality of West Horsley that existing businesses continue to be supported, and that new and appropriate enterprises are encouraged. The purpose of this policy is to encourage opportunities to maintain and encourage organic growth in local employment and other economic opportunities.'</p> <p>West Horsley is a vibrant and beautiful place. Its future can be secured for forthcoming generations by maintaining a healthy balance of housing, shopping, employment opportunities and leisure activities together with the appropriate educational and medical facilities. In this way, the local economy and community can be supported and the rural environment properly protected.</p>	<p>Thank you for your comments.</p>
I	<p><b>West Horsley Methodist Church</b></p> <p>We don't have any further comments to add as I know members of the church have previously done this. We would like to congratulate the team on producing an excellent document.</p>	<p>Thank you for your comments.</p>
J	<p><b>West Horsley Wheel of Care</b></p> <p>Re: Policy No. WH6: Community Facilities</p> <p>One of the primary aims of West Horsley Wheel of Care is to prevent social isolation. The main way in which this is achieved is by the provision of four clubs which provide companionship, friendship and mental and/or physical challenge to local residents. West Horsley Wheel of Care is unique amongst "Good Neighbour" schemes in Surrey in that it is the only scheme which provides such clubs/services for its clients.</p>	<p>Thank you for your comments.</p> <p><b>Where possible amendments will be made to the CAIBE Supporting Documents. However, the majority of this information is not relevant to a Planning / Land Use document.</b></p>

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<p>The four clubs are:</p> <ol style="list-style-type: none"><li>1. Scrabble Club – takes place every Tuesday afternoon (50/52 weeks of the year) in the Wesley Room at The Methodist Church</li><li>2. Film Club – takes place every second Monday of each month at 2pm in the Wesley Room at The Methodist Church</li><li>3. Seated Dance – takes place on Wednesday mornings (term-time only) in the Cedar Room at West Horsley Village Hall</li><li>4. Movement to Music – takes place on Thursday afternoons (term-time only) at the Wheelhouse</li></ol> <p>The community facilities which West Horsley Wheel of Care uses and which are listed in Policy WH6 are of vital importance to the charity. Without them, West Horsley Wheel of Care would be unable to continue to provide the four clubs and the loss of one or more of them would be keenly felt amongst older members of the parish. The Trustees of West Horsley Wheel of Care wholeheartedly support Policy WH6 – these community facilities must be protected from change of use and allowed to continue to be available for the benefit of the community as a whole.</p> <p>The Trustees of West Horsley Wheel of Care have considered the West Horsley Neighbourhood Plan as a whole but have determined to comment only to the extent to which they believe that it will impact upon the services provided by West Horsley Wheel of Care to local residents.</p> <p>Please note that the formal name of the registered charity is West Horsley Wheel of Care.</p> <p>Please note the comments/corrections below on the following paragraphs within the "Community Assets, Infrastructure, Business &amp; Economy" sub-group presentation document:</p> <p>3.4.4 (page 8) – this states that the Wheel of Care is an example of a community activity/service which is "run by respective Churches through worship, care and support". This is incorrect because West Horsley Wheel of Care is an independent registered charity which is administered/run by a team of voluntary Trustees and not by any of the churches within the parish.</p> <p>3.4.6 (page 9) – West Horsley Wheel of Care moved its monthly Film Club and weekly Scrabble Club away from the Wheelhouse in 2013 because it was too cold/uncomfortable for attendees, most of whom are elderly. Prior to this permanent move, meetings of both Film Club and Scrabble Club regularly had to be cancelled during cold weather. West Horsley Wheel of Care would support the renovation and/or redevelopment of the Wheelhouse and would prefer to continue to use the Wheelhouse rather than another venue. However, in the event that the Wheelhouse deteriorated further or became unavailable (for whatever reason), Movement to Music would probably move to West Horsley Village Hall.</p> <p>3.4.7 (page 9) – the details in this paragraph are incorrect. Please remove "It is administered by St Mary's parish office from The Rectory beside the Wheelhouse" and replace with "It is administered by a team of voluntary Trustees, most of whom are residents of West Horsley".</p> <p>3.6.4 (page 11) – West Horsley Wheel of Care regularly uses the Wheelhouse for its Movement to Music club but the only reason we are able to continue to use the Wheelhouse is because Movement to Music is an active class during which participants move around a lot so the fact that it is cold and poorly heated is not normally a problem. As mentioned above, Film Club and Scrabble Club used to be held at the Wheelhouse but have now relocated to the Wesley Room at The Methodist Church.</p>	
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<p>providing facilities completely during redevelopment or rebuilding without having a major and detrimental impact on many people in the parish as well as local businesses which are run from West Horsley Village Hall . <u>Consideration would need to be given to rehousing the groups elsewhere, if at all possible, so as to allow them to continue during any redevelopment or rebuild.</u></p> <p>Re: Policy No. WH11: Local Green Spaces The Trustees would like it to be noted that Site 10 on the list included in Policy WH11: Local Green Spaces (Verge at the junction of The Street / Silkmore Lane) is of vital importance to West Horsley Village Hall because <u>it is the Designated Emergency Evacuation Point for all users of West Horsley Village Hall.</u></p> <p>Re: "Community Assets, Infrastructure, Business &amp; Economy" document Paragraph 3.4.8</p> <ul style="list-style-type: none"> <li>• First line: West Horsley Village Hall should have a <u>capital V and H</u> for village and hall</li> <li>• Second line: "facility" should be "<u>facilities</u>"</li> <li>• Second sentence re uses/hirers: There is no longer a pre-school teaching group and no coffee mornings have been held for some years. <u>Better wording would be</u> "It offers facilities for many different activities including village and parish meetings, drama productions, jumble sales and auctions, art courses, various exercise classes (including one for isolated/elderly residents) and a dance school and is also available for private hire for music and dance practice, counselling sessions and children's parties. It is also used as a polling station whenever an election or referendum takes place."</li> <li>• Final sentence re a larger facility: "provided such as increased car parking facility could be accommodated". Suggest "<u>such as</u>" is replaced by "<u>an</u>" to read correctly.</li> </ul> <p>Paragraph 3.6.2 Please refer to Comment 3 iv) above</p> <p>The Trustees support the generality of the findings and conclusions in the West Horsley Neighbourhood Plan and congratulate the team for the comprehensiveness of the Plan and its associated documentation.</p>	<p><b>NPSG to amend 3.4.8 of CAIBE supporting document.</b></p> <p><b>NPSG to include reference to this in WH11.</b></p> <p><b>NPSG to make suggested corrections to CAIBE supporting document.</b></p> <p>Thank you.</p>
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L	<p><b>West Horsley Community Bus</b>          The committee of The Horsleys Community Bus has reviewed the draft summary plan that is available online and has concluded that the plan appears to be thorough and balanced in perspective.</p> <p>As a voluntary community service organisation we do not feel that it is our role to influence the direction of development in the village, but we do wholeheartedly support the concept of trying to limit developments in the village to those which will not dramatically change the character of the village, and this plan clearly attempts to do this.</p> <p>We are pleased to see the detail and content of Policy WH4: Housing Mix. Our primary role is to provide community transport for the elderly and it is important that the specific housing needs of this segment of the population is catered for in the long term. Additionally, being an organisation staffed by volunteers who have mostly retired from employment, we clearly hear of and see a demand for smaller properties in the area which are suited for senior citizens and for downsizing to. The plan has clearly recognised this need.</p> <p>We are pleased to see a mention of community transport in the implementation section of the summary on page 23. The statement being - "Rail and Bus Services - Proposals and projects to improve the operation of local transport services and encourage 'community transport' schemes will be researched in partnership with Surrey County Council, Guildford Borough Council and transport service operators. "As a locally based community transport provider we aspire to be involved in any discussions on this topic. This may have been the intention of the words "transport service operators", but this phrase is normally taken to mean commercial operators. We would prefer for this paragraph to reference "transport service providers from both the voluntary and commercial sectors".</p>	Thank you for your comments.
M	<p><b>Horsley DFAS</b>          We have no comments thank you. By the way our name is changing to The Arts Society Horsley from July 2017.</p>	Thank you for responding.