

## Consultation Statement

### 1. How we consulted

West Clandon Parish Council working with the Neighbourhood Planning Group consulted extensively with residents and stakeholders at every stage of the development of the West Clandon Neighbourhood Plan.

- 1.1 A Residents' Survey was delivered with the April 2019 Parish Magazine to all 508 households in West Clandon. The Survey was also available on-line. 275 responses were received, which represents a return rate of 54%.
- 1.2 162 of responders provided contact details and the necessary permission for them to be contacted directly with news of relevant updates and events.
- 1.3 The West Clandon Neighbourhood Planning Steering Group then invited residents to participate in an informal consultation on the Draft Plan.
- 1.4 The Plan was published on a dedicated website [www.westclandonplan.org.uk](http://www.westclandonplan.org.uk) which was widely promoted in the village through monthly parish council updates in the parish magazine distributed to all residents. Residents were also kept in touch via, the village email (over 200 subscribers), a local social network (over 400 subscribers) and the Parish Council's own website.
- 1.5 Letters were written to The Earl of Onslow, and The National Trust, both significant landowners in the Parish, to alert them to the ongoing development of the Plan. A supportive written response was received from the National Trust.
- 1.6 A presentation on the emerging plan was made at the 2019 AGM of the Clandon Society attended by over 30 local residents.
- 1.7 On the 23<sup>rd</sup> June 2019 a Sunday afternoon drop-in session on the Plan was held at the Royal British Legion, West Clandon which attracted a different demographic and was again attended by over 30 people. The feedback helped with the ongoing process of plan revision.
- 1.8 On the recommendation of the Neighbourhood Planning Group the Parish Council decided to commission Surrey Community Action to produce an independent Area Character Assessment of the Parish to help strengthen the evidence base.
- 1.9 On the 8th September 2019 a draft of the Character Assessment was presented to a further drop-in session at the Royal British Legion to which all residents were again invited. Again the comments provided helped to ensure that the assessment accurately reflected the Parish. The draft and revised documents were published on the Neighbourhood Plan Website along with updated versions of the emerging plan.
- 1.10 In October 2019 the Neighbourhood Planning Group commissioned a Housing Needs survey the results of which have informed the policies in this plan.

- 1.11 The formal Section 14 Consultation on the plan ran throughout February and March 2020. This was widely publicised through the channels outlined above. In addition letters were sent out to the statutory consultees and major local stakeholders including those recommended by Guildford Borough Council.
- 1.12 In June 2020. Following the section 14 Consultation, a revised draft of the plan, including more information on the proposed protected parish views and the key features identified for each Character Area was published for comment on the dedicated neighbourhood plan website and publicised through the Parish Magazine.

## 2. Who we consulted with

In addition to communications with residents through the channels described above the following Statutory and other organisations were contacted directly by letter or email to announce the Section 14 consultation process and invite comment.

Historic England	EDF Energy	Scotia Gas Networks
Send Parish Council	Homes and Communities Agency	UK Power Network
Shere Parish Council	Albury Parish Council	NHS England South
Effingham Parish Council	East Clandon Parish Council	Environment Agency
Albury/Compton Parish Council	Openreach newsites	Ockham Parish Council
Surrey County Council	Southern Water	Vodafone (property team)
NHS Property Services Ltd	Highways England	Guildford and Waverley CCG
East Horsley Parish Council	Network Rail	Thames Water
St Martha Parish Council	Scotland Gas Networks	Clinical Commissioning Group (NHS)
South East Water	Guildford and Waverley CCG (NHS)	Woking Borough Council
Ripley Parish Council	Affinity Water Ltd	Church of St Peter and St Paul W Clandon
West Horsley Parish Council	Southern Gas Networks	Martin Grant Homes Ltd
Natural England	Scottish and Southern Energy Power Distr	National Trust
Mobile Operators Association Ltd	Virgin Media	Burpham Development Forum
Waldon Telecom Ltd	Guildford Borough Council	
<i>Contact Information provided by Guildford Borough Council</i>		

### 3. Comments received and responses made

By the end of the consultation period on 31<sup>st</sup> March 2020, 19 responses had been received. The main issues raised were as follows:

#### ***(i) Burpham Community Association, Burpham Neighbourhood Forum and the Merrow Residents Association***

The Section 14 Consultation Draft Plan reflected the strongly expressed wish to reduce traffic along the A247 (The Street) in West Clandon and promoted the Merrow Lane/Park Lane Route lying to the West of Clandon Park to be evaluated and possibly developed as an alternative route. Merrow and Burpham respondees were opposed to this option. West Clandon Parish Council subsequently agreed to remove any specific reference to this route from the Plan and instead to include as a community aspiration, “Every opportunity should be taken to identify and evaluate alternatives routes for traffic, particularly heavy good vehicles, to the A247 through West Clandon. This should include possible routes to the West of Clandon Park opened up by any development at Gosden Hill and proposals to improve the A3 and its junctions and associated link roads.”

#### ***(ii) Guildford Borough Council and Residents***

The treatment of the sensitive strip of land which separates West Clandon from the conurbation of Guildford has been the subject of extensive discussion with Guildford. The potential designation of a ‘Strategic Gap’ is strongly supported by residents but the Parish Council is persuaded that such strategic matters are not appropriate in a Neighbourhood Plan and the revised draft focuses on the need for any sustainable development in this location to be appropriate to its sensitive location and to mitigate the pressure for the coalescence of the Village of West Clandon with its surroundings.

#### ***3.1 Specific comments received from residents were as follows:***

<b>Comments</b>	<b>Response</b>
<b>Resident A</b> <b>1. Strongly Support the Plan and the Green Gap</b> <b>2. Plan could give special attention to the effect of additional traffic in the Conservation Area.</b> <b>3. Development should correlate with infrastructure improvements.</b> <b>4. Community Facilities should be preserved.</b>	1. Noted 2. We have included a reference in introduction to relevant Policy (Policy 1). 3. Noted-references to infrastructure strengthened. 4. Already covered in Policy 5.

<p><b>5. Plan could favour developments which do not need the private car and provision for retirement homes.</b></p> <p><b>6. Emphasise the importance of wildlife preservation.</b></p>	<p>5. Would conflict with local demand for adequate parking in an area largely dependent on private car. Opportunities for downsizing already included.</p> <p>6 We have added a specific reference to Policy 6.</p>
<p><b>Resident B</b></p> <p><b>Excellent Plan.</b></p> <p><b>Would like to see mention of Park &amp; Ride North of W Clandon.</b></p>	<p>This is beyond the scope of the plan.</p> <p>The Parish Council is concerned that the traffic impact and siting of a P&amp;R to the North could have a negative impact on the A247 through the village and has decided not to include this at this stage.</p>
<p><b>Resident C</b></p> <p><b>1. Problem is the speed of traffic- reductions in speed limits needed.</b></p> <p><b>2. Gates and Board fencing are becoming necessary due to theft and difficulty of maintaining hedging on the Street.</b></p> <p><b>3. Submitted applications from developers for access are not accurate.</b></p> <p><b>4. There is no room for cycle routes on current footpaths.</b></p> <p><b>5. Lack of security (for cycles) at Clandon Station would be an issue.</b></p> <p><b>6. Majority of cycles and motorbikes are en route to Newlands Cnr.</b></p> <p><b>7. No plan to help the elderly or disabled.</b></p> <p><b>8. No Health and Safety aspect.</b></p>	<p>1. There are limited options to address this directly in a Neighbourhood Plan but it is included as a Community Aspiration.</p> <p>2. The NPG and feedback from residents supported the view that high fences were adversely affecting the character of the area. Policies have been amended to allow exceptions for noise mitigation along the A247 and A25.</p> <p>3. Not an issue for the Neighbourhood Plan.</p> <p>4. Available space would be an assessment criteria for each individual proposal.</p> <p>5. This would be an issue for Network Rail/SWR to resolve.</p> <p>6. Noted.</p> <p>7 &amp; 8. Not planning issues as such. Policy preference for allow for downsizing included.</p>
<p><b>Resident D</b></p> <p><b>Plan Supported and no suggestions.</b></p>	<p>Noted.</p>
<p><b>Resident E</b></p> <p><b>Request to amend the proposed green gap boundary to include a field behind properties on the Street (from Long Clandon to Old House).</b></p>	<p>This was due to a small error in the map which has been corrected as requested.</p>

<p><b>Resident D</b> Request to amend the proposed green gap boundary to include a field behind properties on the Street (from Long Clandon to Old House).</p>	<p>As above.</p>
<p><b>Resident E</b> 1. We should be very clear that with the mix of housing and the numbers either in-built or allocated within 1.5-2.5km of the centre of the village in the Local Plan viz. 14 houses being built at Foxfields, 550 in the area of Garlick’s Arch and 1800 for Gosden Hill the need for new housing in the Village/Conservation area cannot be demonstrated. 2. A general point relating to the Clandon Park Estate-can we not say that we would resist any proposal for commercial developments in Clandon Park-the trustees have several times proposed commercial development of farm buildings. It might not take much for this to be declared a brown field site-as I believe Foxfields was. 3. Policies 1.3,1.4 &amp; 1.5 (Now Policy iii, iv &amp; v) I find these confusing taken together. On the one hand a plea for open, active frontages but then matching the existing is required. There are already many high, close-boarded fences, walls and gates. 4.Policy 1.7 Assuming that “Village” means the combined settlement and conservation areas it is difficult to see space for a development of “more than 6 houses” unless redevelopment of existing large gardens is contemplated. I would not support this. 5.Policy 1.8 “When adjoining the boundaries of the built- up area of the village”-is this confined to the settlement area or does it include the conservation area. I think clarity is needed here.</p>	<ol style="list-style-type: none"> <li>1. Although the plan has set strict criteria for development in the area it is mindful for the requirement to support sustainable development.</li> <li>2. The Parish Council decided against developing site specific policies at an early stage.</li> <li>3. Additional information has been provided to clarify.</li> <li>4. This arbitrary limit no longer features in the Plan.</li> <li>5. The text has been clarified.</li> <li>6. The text has been reworded to clarify.</li> <li>7. We are advised it would have no effect. As a strategic scheme it is beyond the scope of the NP and reference has been removed.</li> <li>8 Development in the Green Belt is possible if national criteria are met. The Neighbourhood Plan aims to encourage consideration of local factors.</li> <li>9. This has now been included.</li> <li>10. These do feature in the plan and the references have been clarified.</li> </ol>

<p><b>6. Policy 1.10</b>  Provision of footpaths. Presumably this relates to new developments in the “Village”. Not clear how this could be achieved along roads/streets that do not have footpaths.</p> <p><b>7. Policy 2.1</b>  We can say we wish development of Gosden Hill not to commence until the A3 access is approved in writing but I fear it will have no effect.</p> <p><b>8. Policy 3</b>  The area of the parish remaining after Gosden Hill was removed from the green belt remains as green belt and therefore development is inappropriate. I fear that if a revision to the Local Plan removes green belt status from a further tranche of the parish, development of this will be governed by GBC and not what we may put in our plan.</p> <p><b>9. Policy 4</b>  The omission of the area of land between the railway and Dedswell Drive from the Strategic Gap seems odd. This land has been the subject of development proposals in the past which the village has resisted.</p> <p><b>10. Protection of views-consider including the view across the Clandon Estate from the rec. and Legion and the view westward from FP 568.</b></p>	
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**3.2 Comments from Stakeholders and Statutory Consultees**

<b>Respondent</b>	<b>Comments</b>	<b>Response</b>
1. <b>Charlotte Mayall Southern Water</b>	No comment	Noted

<p><b>2. Gary Roberston SGN</b></p>	<p>SGN do not forecast any issues with maintaining their gas infrastructure.</p>	<p>Noted.</p>
<p><b>3. Simon Harkins SGN</b></p>	<p>Current gas infrastructure is expected to be sufficient for the projected developments in the Local Plan. Should reinforcement be required SGN will look to manage the provision of infrastructure improvements in line with growth/development required. Alterations to existing assets would be funded by the developer. Early notification of developer’s proposals to use renewable technologies should be highlighted. Notification of future updates to the NP welcomed.</p>	<p>Noted.</p>
<p><b>4. Liz Critchfield Secretary Burpham Community Association</b></p>	<ol style="list-style-type: none"> <li>1. Chairman’s comments give no indication of the enormous problems engendered by the development at Gosden Hill Farm.</li> <li>2. Proposals are made for roads and areas outside the W Clandon Parish Boundary. Proposals which refer to another Neighbourhood Plan Area cannot be made without prior consultation.</li> <li>3. Para 2.1 “Development (on GHF) should not commence until access arrangements to the A3 have been approved by the LPA” should be strengthened to “the A3 junction should be in place before development begins”.</li> <li>4. Para 2.2 and 7.5 referring to improvement on Merrow and Park Lane is outside the parish boundary and should be removed.</li> <li>5. Para 2.3 and 7.4 referring to a network of footpaths and cycle paths between Clandon and Burpham should be more specific with a detailed plan showing possible routes.</li> <li>6. The BCA is concerned about existing and projected traffic levels in Burpham and the perceived attempt to move traffic from Clandon to Burpham.</li> </ol>	<ol style="list-style-type: none"> <li>1. The introduction references the pressure this development will put on local infrastructure.</li> <li>2. References have been removed from the policy section. A reference to the local desire to find unspecified solutions to traffic issues on the A247 has been added as an aspiration.</li> <li>3. We are advised that as a strategic site including such a statement within the West Clandon Neighbourhood Plan will have no impact. This section has now been removed.</li> <li>4. The Parish Council has removed the reference from Policy 2 and included a revised statement as a community aspiration.</li> <li>5. More specific wording has been included in revised Policy 2 (i) which is consistent with Guildford Local Plan Policy LPS&amp;S 26(6).</li> <li>6. See 4 above.</li> </ol>

<p><b>5. Historic England</b></p>	<p>1. Para 4 on the character of W Clandon could make reference to the Character Assessment and include more information on the Conservation Area, listed buildings and non-designated heritage assets and suggest a non-heritage list could be prepared. (Some examples provided)</p> <p>2. EH welcome the Plan’s aim to reinforce local distinctiveness.</p> <p>3. In Para 5 the term ‘heritage assets’ is preferred to ‘architectural assets’. EH would welcome a specific objective for the conservation and enhancement of the significance of heritage assets in the parish.</p> <p>4. Policy 1 is supported but as there is little analysis in the Character Assessment on positive and negative features it might be difficult to determine whether planning applications would harm the character. The Parish Council could consider a summary of key positive features in each character area within the text.</p> <p>5. EH welcome Policy 3, particularly 3.1, 3.2, 3.4 and 3.5.</p> <p>6. Policy 4 on protected views is welcome but the Character Assessment and view are too short on detail. The plan should state what is special about each view and why it has been selected to ensure the policy is clear and implementable.</p>	<p>1. More information has been added to the text.</p> <p>2. Noted.</p> <p>3. The changes suggested have been made.</p> <p>4. A clearer summary of the key features of each character area has been added to the Plan as suggested.</p> <p>5. Noted.</p> <p>6. Significant additional information on each of the Views has been added to the Character Assessment as suggested.</p>
<p><b>6. Thames Water Utilities Ltd</b></p>	<p>Thames Water recommend the inclusion of the following supporting policies/text concerning Water and Wastewater/Sewerage infrastructure:  “Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p>	<p>The information requested has been added to the text.</p>

	<p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>With regard to surface water drainage Thames Water request the following paragraph be included:  “it is the responsibility of the developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer as this is the major contributor to sewer flooding”.</p>	
<p><b>7. Jim Allen and Christian Holliday Burpham Neighbourhood Forum</b></p>	<ol style="list-style-type: none"> <li>1. Where the Plan refers to matters outside the Parish Area they should be shown as ‘aspirational’</li> <li>2. Parish Boundary Map. A clearer map is needed for the reader to better understand the parish boundary.</li> <li>3. Neighbourhood Plan Process (Pages 5-9) The early paragraphs in the Plan refer to ‘process’ and will cease to be of specific interest to the reader once the Plan is adopted. This section should be removed or moved to an Appendix.</li> <li>4. Page 5 a. The opening paragraph should confirm that the emerging West Clandon Plan has been positively prepared and proactively supports sustainable development.</li> </ol>	<ol style="list-style-type: none"> <li>1. Specific references have been amended/moved to Section 7 on Community Aspirations.</li> <li>2. This is the official map provided by GBC.</li> <li>3. Other NPs have included this section.</li> <li>4. Already implied in our wording agreed with GBC.</li> <li>5. Wording agreed with GBC.</li> <li>6. We have added ‘and subsequent amendments’ as suggested.</li> <li>7, 8, 10, 19 The Parish Council has removed the reference from Policy 2 and included a revised statement as a community aspiration.</li> </ol>

	<p>5. Section 2 a. Planning decisions are taken by the Local Planning Authority. Planning and plan making are wider than just provision of housing. This section should be reworded to reflect this.</p> <p>6. Reference to Neighbourhood Planning Regulations (Page 6) a. Reword to read “Neighbourhood Planning Regulations as per 2012 and subsequent amendments.</p> <p>7. Page 9 - Direct Access to the A3 from Gosden Hill a. This section calls for a need for direct road access to the A3. However, there is a failure to identify how traffic from this development will travel north onto the M25 J10 and there is a more significant failure to accept the implications of the approximate 4,000+ vehicles which will attend or use this site when completed. b. The Plan wishes to see the maintenance of the green spaces between Gosden Hill and West Clandon, yet by seeking to force traffic onto Merrow Lane appears to give no acknowledgement to the Local Green Space of Burpham on Merrow Lane, in the made Burpham Plan. c. The emerging GBC Masterplan for Gosden Hill calls for part pedestrianisation of Merrow Lane which we support. d. Merrow Lane is totally unsuitable for increased traffic of this nature as it has no north bound access to the A3 nor sufficient width at the railway bridge at the New Inn Lane end to cope with the level of traffic predicted.</p> <p>8. Page 10 and Page 14 - Transport and Travel a. The West Clandon Neighbourhood Plan is unsustainable in its present format. b. We recommend further consultation with the Burpham Neighbourhood Forum, specifically in relation to transport and travel matters. c. The Plan as currently drafted appears to push new traffic demands outside of West Clandon into surrounding Wards. d. This is not a sustainable approach. Consideration should be given</p>	<p>9. We believe linking the policies to the rationale in this way is easier to follow but have highlighted the polices in boxes to make the distinction clearer.</p> <p>11. Policies 2 has been revised to take account of this.</p> <p>12. Policy 4 has been substantially revised in the light of this and other feedback.</p> <p>13. This section has been superseded by new Policy 8 which takes account of but does not necessarily follow Guildford and Surrey standards. The policy does not refer to areas within Burpham.</p> <p>14. Similar polices are common in Neighbourhood and Local Plans and could be reviewed if necessary.</p> <p>15, 16 Policies 3 and 4 have been substantially revised to take account of this and other feedback.</p> <p>17. Enforceable at planning stage. Rabbit Fencing is a different issue.</p> <p>18. The Maps have been repositioned in the document.</p> <p>19. This section has been removed and a wider point included as a community aspiration.</p> <p>20. Similar to wording used in other adopted NPs.</p>
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to supporting a direct link from the A3 to the A25. e. Further backing should be given to an all-ways junction at Potters Lane, as proposed by Martin Grant in the 1980s.

9. Policy 1 It is not clear what text is background information and when the Policy itself begins. General Note: policies should be reformatted to make the actual policies more prominent. Much of the introduction to the policies could be placed in an Appendix.

10. Policy 2 a. Paragraph 2.1 - This statement appears ultra vires. b. Paragraph 2.2 – This is not clear, is outside the Plan area and contradicts the Burpham Neighbourhood Plan. This specifically makes this area a Local Green Space. The emerging Master Plan for Gosden Hill proposes the pedestrianisation of a large section of Merrow Lane, which the Burpham Neighbourhood Forum supports.

11. Para. 2.3 - It is unclear how these links referred to could be instigated and created as not all of the land required to link West Clandon to Burpham is in the Gosden Hill allocation. Further this retail area is already over trading and in any case Gosden Hill will have its own retail allocation.

12. Para 2.7 - The gap between Gosden Hill and West Clandon is not a defensible boundary in Green Belt terms and protection in the long term is part of the Local Plan review process and future development cannot be ruled out in this way as part of this Policy.

13. Paragraph 2.9 - Parking standards of SCC and GBC are not compatible, furthermore, Burpham parking standards will apply to part of the site.

14. Paragraph 2.10 - Is too specific and liable to be superseded if there are advances in technology.

15. Policy 3 a. Opening Paragraph - It is for the Local Plan process to release land from the Green Belt. b.

	<p>Paragraph 3.1 – This is ultra vires because circumstances under which development proposals are assessed in the Green Belt are set out in the NPPF. c. Paragraph 3.3 - This is not defined by the Policy.</p> <p>16. Policy 4 a. This Policy is ultra vires as Neighbourhood Plans are not empowered by statute to create strategic gaps. If the Policy is taken forward in an alternative form it should be accompanied by a plan. b. Generally a policy relating to special views should be separated out to form another Policy.</p> <p>17. Policy 6 a. 6.2: We are concerned over the ability to enforce of this section of the Policy b. 6.5: Fences cannot be enforced as rabbits are a notifiable ‘pest’. People cannot be stopped from rabbit-fencing their properties.</p> <p>18. Policy 7 a. This should be renamed 'Local Green Spaces' and should have maps included within the Policy, not at the end of document.</p> <p>19. The current aspiration appears to want to move traffic to Burpham Plan Area, away from the A247. c. The Burpham roads are already over capacity and the claimed strategic gap excludes the theoretical provision of a link to the A25. d. Traffic will increase on the A247, trying to avoid congestion on Merrow and Park Lane with no ability to travel north on the A3 from this location. e. Shopping will occur in Burpham, and then through traffic should be moved north of Burpham to reduce congestion. f. This is poorly thought through, a wider appreciation of traffic problems is required.</p> <p>20. Plan preparation process: this should be clarified if the parish or the LPA adopt the NP as part of the LP.</p>	
<p><b>8. Ellen Howells, National Trust</b></p>	<p>1. Policy 2 Goden Hill Farm. NT strongly supports Policy 2 relating to footpaths and cycleways along key routes and requests that these should be sensitively integrated into the</p>	<p>1. Noted. 2. Policy 4 has been substantially redrafted but the extension to the gap suggested would include</p>

	<p>historic nature of the landscape or impact habitats and biodiversity</p> <p>2. Policy 4 Views and Strategic Gaps. NT notes that the SG southern boundary runs along footpath 75, cutting through the Clandon Park estate, which is designated an Historic England Registered Park and omits the park to its south including the setting of grade I listed Clandon Park. We request consideration be given to the extension of the boundary of the Strategic Gap to the south, to include the full extent of the Registered Park. This will ensure consistency in policy application for the management of the parkland and any proposals that come forward within it.</p> <p>3. NT are broadly supportive of the policies relating to the Strategic Gap, and acknowledge that in large part these reflect national policy in relation to the protection of the Green Belt. We note that within the Strategic Gap, developments which ‘respect and enhance the rural nature of the area and do not compromise the continued viability of the Strategic Gap may be supported in exceptional circumstances’.</p> <p>4. Given that a large area of the Strategic Gap includes historic Clandon Park, we would request that the policy wording acknowledges this and incorporates the following wider wording; ‘respect and enhance the rural nature, historic character, significance and amenity of the area’. We would also request that any developments within the Gap are only considered in ‘exceptional circumstances’ and with consideration of the impact on its character and setting. Development should accord with national Green Belt policies. We also consider it important that the cumulative impact of separate proposals on the Strategic Gap are considered.</p>	<p>Temple Court which has been subject to development proposals in the past. The Parish Council has determined to avoid site specific interventions in its plan and believes the area proposed in the consultation is sufficient for its specific objectives.</p> <p>3. The wording suggested by the NT has been included in the revised Policy 4.</p> <p>4. The additional protected view suggested has been included in Policy 4.</p> <p>5. The wording suggested has been added to the text.</p> <p>6. Noted.</p> <p>7. Noted.</p>
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	<p>5. We note that the views we highlighted in our earlier feedback on the draft Plan have yet to be incorporated – from Clandon Park towards The Street and the Village – and we again request that these are taken into consideration so that they may be protected and enhanced.</p> <p>6. Policy 6 on Biodiversity and Environment principles supported. Where net losses are unavoidable a rigorous evidence based assessment demonstrate any special circumstances should apply.</p> <p>7. Policy 7 on Protected Green Space is supported. The need for very special circumstances for developments is emphasised.</p> <p>8. The inclusion in the Delivery Plan of improved sustainable transport and north south links is supported.</p>	
<b>2. Send Parish Council</b>	<p>Proposals generally supported.</p> <p>Send PC shares W Clandon PC’s concerns about traffic particularly the A247.</p> <p>Proposals for sustainable and accessible transport which helps address issues in Send would be supported.</p>	Noted.
<b>3. James Green, Spatial Planning Officer, Surrey County Council</b>	<p>1. The County Council is pleased to see the coverage that heritage and conservation issues are given within the draft plan, especially regarding heritage assets within the built environment and “cherished” views. However, the NDP and evidence base could go further in identifying the characteristics of building materials and architectural details adopted in the parish, rather than identifying any given period or building type. The characteristic building style within West Clandon is not homogenous but comprised of individual and/or especially designed one-off properties. This creates difficulty in defining what makes the village special in terms of guiding future development. This addition would guide future development within the parish,</p>	<p>1. Additional information and analysis has been included as suggested.</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. Noted. The Plan does not refer to specific schemes but indicates support for development where suitable schemes can be identified. WE understand that the route specified has been subject to further discussions.</p>

resulting in more innovative and individualistic design. Identification of such features within the parish could include timber framing or tile-hung upper storeys of buildings. Inclusion of these design aspects of local character would help retain the nature of the village by creating more individual and interesting one-off new properties to complement the existing building stock.

2. The county council maintains a Historic Environment Record of archaeological sites, finds and historic monuments within the current administrative county. Should the Neighbourhood Planning Group be interested in receiving this information, the email address to contact would be [her@surreycc.gov.uk](mailto:her@surreycc.gov.uk).

3. Highways Issues

Policy 6 Biodiversity and Environment states that 'Proposals should retain or re-provide as necessary natural verges to the highway'. The grass verges surrounding the Garlick's Arch site allocation are likely to be used to provide a shared footway/cycleway in addition to other verges related to different schemes may be required for highways improvement works in the future.

4. With regard to non-statutory community aspirations included in chapter 7, improvements to cycle and pedestrian routes from Clandon Road to West Clandon Station were investigated as part of the Garlick's Arch pre-application discussions. Improvements can be made to FP568 for pedestrians; however, it is not possible to upgrade this to allow cyclists due to neighbouring properties. There are also width restrictions and land ownership constraints on Clandon Road and The Street which means significant improvements for pedestrian and cyclists are unfortunately not feasible here.

<p>5. Keith Meldrum Marrow Residents' Association</p>	<p>1. MRA express concern over the emphasis on the separation of West Clandon from Gosden Hill but no reference on the most obvious mitigating measure to reduce traffic through the village- a direct connection between Gosden Hill Farm and Garlick's Arch. This effectively ensures that northbound Gosden Hill Farm traffic bypasses West Clandon.</p> <p>2. The Draft Plan covers areas and issues outside the Parish of West Clandon without any contact or discussion with the neighbouring communities. Policy 2 (Gosden Hill Farm) Paragraph 2.1 states: "Development shall not commence until details of the access arrangements to the A3 have been submitted to and approved in writing by the Local Planning Authority." MRA take the view that Policy A26 of the GBC Local Plan requires a two way junction with the A3 which must be developed at the same time that the site is developed and must be available for use by construction vehicles.</p> <p>3. The Highways Authority take the view that a 4 way junction is not necessary with the A3 on the Gosden Hill Farm site and no improvements to the A3 at Gosden Hill Farm are being proposed in Road Investment Strategy 2: 2020-2025'. That being the case we take the view that the connector road covered by Requirements (2) of Policy A26 between the Gosden Hill Farm site and the A247 at Garlicks Arch should be put in place to route northbound traffic from Gosden Hill Farm direct to the new slip roads at Garlick's Arch to avoid this traffic going through either Burpham or Marrow. Without either of these there will be an increase in traffic in Burpham and Marrow and pressure on the A247 through West Clandon.</p> <p>4. Paragraph 2.2 states: "Improvements to Marrow Lane and Park Lane, including the railway bridge at Marrow Park</p>	<p>1-4 and 7. The Parish Council has removed the reference from Policy 2 and included a revised statement as a community aspiration.</p> <p>5. For info only.</p> <p>6. See Document 8 Response 5.</p> <p>8. The Parish Council noted previous contacts between Marrow and W Clandon and felt in view of the above (1-4 and 7) and the removal of the relevant proposals from policy future meetings purely in the context of the neighbourhood plan were unnecessary at this stage.</p>
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and the link to the A3 should be evaluated and implemented as necessary.” Since Park Lane is outside West Clandon Parish MRA state this road should not be included and there can be no realistic possibility that the railway bridge between Burpham and Merrow will be improved or widened.

5. The Strategic Development Framework – Supplementary Planning Document (SPD) raises the possibility of closing part of Merrow Lane to vehicular traffic. MRA have expressed concern to GBC at the suggestion of a new entrance to Gosden Hill on Merrow Lane bringing a gateway back into use (See MRA letter). They object to the proposal that the current access to the farm and farm buildings should be restricted to access to Gosden Hill Farm and about 100 homes. They do not support the GBC proposal that pedestrians and cyclists in parts of Merrow Lane should have priority but that the lane should be for the use of all.

6. Policy 7 Non-Statutory Community Aspirations. Paragraph 7.4 refers to “Improved and new off-road cycle and pedestrian routes to Merrow and Burpham.” No comment on this ‘in the absence of any detail.’

7. Paragraph 7.5 states that: “An evaluation of the use of Merrow/Park Lane linking with a new A3 junction as an alternative route to the Street for heavy traffic.” These roads lie outside the parish of West Clandon and therefore we suggest that this reference should not appear in your Plan.

8. Discussion between MRA and WC on traffic issues concerning Gosden Hill Farm requested

**3.3 The following comments were received from Guildford Borough Council**

Comment	Proposed Response
<p><b>3.1 The Plan includes an introductory background section which is helpful for the Plan’s users. The plan largely uses positive wording and policies that support the right kind of development in the right places. This approach is supported.</b></p>	<p>Noted.</p>
<p><b>3.2 The plan includes policies and supporting text in close proximity. To improve clarity, policies should be inserted into boxes to differentiate them from other text and make the plan easier to navigate. Policies should also include their title for ease of reference.</b></p>	<p>Agreed.</p>
<p><b>3.3 Text in plans is often referred to within planning decision and appeal documents, and the examiner of the plan will need to refer to specific text in his or her report. This will be much easier if every paragraph has a number, including the supporting text (which is currently not numbered). A format commonly used in Development Plan Documents for supporting text paragraphs is to use a document style (e.g. 4.1, 4.2, 4.3) and to number policy paragraphs with a round number. If a policy includes a list, its entries can be assigned letters. Maps should also be numbered and titled for ease of reference.</b></p>	<p>Agreed.</p>
<p><b>3.4 Maps are used in a number of places, which are relatively low resolution and quite difficult to read in places. The Council can help by providing maps that are clearer should the Qualifying Body request this.</b></p>	<p>Noted- maps not already provided by GBC have been upgraded.</p>
<p><b>3.5 The Plan could benefit from proof-reading in order to address a number of formatting and grammatical issues. The Council can help with this should the Qualifying Body request.</b></p>	<p>Noted. We will request this.</p>
<p><b>4.2 It is suggested that for clarity the policy could begin by stating: Development proposals within West Clandon Village (Settlement and Conservation Areas) will be supported subject to the following criteria.</b></p>	<p>Agreed.</p>
<p><b>4.3 The Policy Map demonstrating the identified West Clandon village settlement and Conservation Areas (currently provided on page 22) could helpfully be placed closer to the Policy that relies on it. It is recommended that the map could helpfully be provided below the Policy text.</b></p>	<p>Agreed.</p>

<p><b>4.4 Policy 1 (1.1) The promotion of high-quality and distinctive local design is supported. However, could this policy helpfully be expanded to all development rather than just new buildings? Extensions and alterations to existing buildings can be equally as important in maintaining high quality design and local distinctiveness.</b></p>	<p>Agreed.</p>
<p><b>4.5 Policy 1 (1.2) To be more effective, this criterion could helpfully be redrafted as follows: “Where modern contemporary design is used, it should be of the highest design quality and relate comfortably to and respect the rural character of the area and its immediate setting. Modern designs must incorporate clear environmental and sustainability benefits including by being energy efficient, demonstrating very low levels of carbon emissions, and significant biodiversity gains”.</b></p>	<p>Agreed.</p>
<p><b>4.6 Policy 1 (1.4) It is worth noting that planning permission is only required for the erection of a fence, wall or gate if it would be over one metre high and next to a highway used by vehicles (or the footpath of such a highway) or over two metres high elsewhere. It will therefore be difficult to achieve the objectives of this policy due to permitted development rights. The wording ‘should be placed behind...’ should be reworded to say ‘it is encouraged to be softened with hedging or green planting.’</b></p>	<p>Agreed.</p>
<p><b>4.7 Policy 1 (1.6) This criterion may not be appropriate in all circumstances and may lead to unnecessary delays in planning applications, particularly as the Gosden Hill site may appropriately contain some character areas within the site with more urban feel. The criterion could usefully be redrafted as follows; “Unless demonstrated to be inappropriate, proposals should have regard to the need to retain and enhance the leafy, rural character of the area;”</b></p>	<p>Policy 1 does not apply to Gosden Hill but only to the village settlement and conservation area. No change proposed.</p>
<p><b>4.8 Policy 1 (1.7) This policy criterion seeks to restrict proposals within the village to developments of fewer than 7 dwellings. There does not appear to be any justification for this within the supporting text of the Plan. Given that the NPPF supports “significant uplifts in density” in sustainable locations, it will be difficult to justify a blanket refusal for any development above 6 dwellings in the village.</b></p> <p><b>4.10 This criterion is unlikely to be appropriate in all circumstances and may lead to unnecessary delays in planning applications. For example, the redevelopment</b></p>	<p>Policy deleted and replaced with ‘any such development should be in character and preserve leafy rural character covered in other policies’.</p>

<p>of a number of non-residential buildings within the village for residential use, and/or the redevelopment of existing homes at higher density, may be entirely appropriate. However, criterion 1.7 is likely to promote piecemeal development that undermines the objectives and policies of the Local Plan in securing appropriate contributions on sites. These include the requirement of Local Plan policy H2 for affordable housing contributions, which, in designated rural areas such as West Clandon, become liable only on schemes of six or more dwellings. 4.11 In its current form, this policy criterion is considered to be overly prescriptive and an examiner may recommend its removal from the policy. As such, the Council recommends that this criterion is deleted.</p>	
<p>Policy 1 (1.10) If this criterion is a requirement for developers (which is unclear from the wording used), then it needs to be better explained as to how developers would be able to provide footpaths along frontages adjacent to existing public roads on “key routes”. These routes have not been defined, nor has the length/extent of the frontage where a footpath would need to be provided. Furthermore it may not be feasible to require a developer to provide a footpath and/or infrastructure contributions for this work in every case as this would need to be agreed with as part of a section 106 agreement for a specific planning application, which the Council may not consider necessary to make the proposed development acceptable in planning terms. It might be more appropriate to express this criterion as wording to encourage, rather than require, the provision of footpaths besides certain roads to encourage walking and or improve pedestrian safety</p>	<p>Agreed.</p>
<p>Policy 1 (1.12)  4.14 This criterion is repeated a number of times within the Plan. It would be more effective to remove the criterion from policies that are currently quite long and provide the information as a separate policy that addresses parking within the whole neighbourhood area. This would make the plan more readable and effective.  4.15 The criterion references the need to take account of Surrey County Council’s parking guidance, which is contained within its Vehicular and Cycle Parking Guidance (January 2018). The Council does not apply these requirements rigidly, as paragraph 105 of the NPPF states that parking policies should be flexible and</p>	<p>Separated out as suggested. See new Policy 8.</p>

<p>take account of the particular characteristics of particular sites. It may not be feasible to provide off-street parking in all cases, for example redevelopment of an existing building in a narrow street or where the building plot size is too small to accommodate it.</p>	
<p><b>Policy 1 (1.14)</b>  <b>4.16 This criterion (contribution to affordable housing) is unnecessary. The development proposal will already be expected to comply with Local Plan policies with regard to affordable housing provision. In order to avoid duplication, it is recommended that this is deleted</b></p>	<p>Agreed.</p>
<p><b>Policy 1 (1.17) (subdivision of larger properties)</b>  <b>4.17 This policy criterion seems at odds with Policy 1.16 which favours development of smaller sized properties for occupation by younger or older families including opportunities for downsizing. It is recommended that the Qualifying Body seek to improve the wording of this criterion or simply delete the wording.</b></p>	<p>Criterion redrafted.</p>
<p><b>Policy 2 The strategic site at Gosden Hill Farm</b>  <b>5.1 Policy 2 seeks to address the design and implementation of the Local Plan strategic site at Gosden Hill, of which approximately half is within the West Clandon Neighbourhood Area.</b>  <b>Policy 2 (2.1)</b>  <b>5.2 The provision of appropriate infrastructure is covered by Local Plan: Strategy and Sites Policy ID1, wherein infrastructure is required to be provided when “first needed”. Planning permission cannot be granted on this site until safe and suitable access arrangements are agreed and form part of the permission</b>  <b>5.3 The phasing of the development site and appropriate delivery of infrastructure will be determined during the planning application. As such, this is considered to be a strategic matter and outside the scope of the Neighbourhood Plan. The blanket restriction of development until a certain piece of infrastructure is delivered is likely to be considered overly prescriptive, outside of the remit of the Neighbourhood Plan, and not in general conformity with strategic policies in the LPSS and as such not meet the basic conditions. It is</b></p>	<p>Policy (2.1) removed.</p>

<p>recommended that this criterion is removed as it is already covered in the Local Plan.</p>	
<p><b>Policy 2 (2.2)</b>  <b>5.4 Policy 2 (2.2) should be more closely aligned with national and local policy and guidance, for instance as follows (proposed amendments underlined): ‘2.2 Improvements to Merrow Lane and Park Lane, including the railway bridge at Merrow Park, and also the potential to provide a through route within the site to link the B2234 to the A3 at the improved junction, should be evaluated and implemented as necessary in order to achieve safe and suitable access to the Gosden Hill Farm site, a well-designed new development, and maintain the safe operation and the performance of the Local Road Network and the Strategic Road Network;’</b></p>	<p>This policy has been deleted and replaced with a revised statement as a community aspiration.</p>
<p><b>Policy 2 (2.3)</b>  <b>5.8 This policy picks up on the issue of cycleways and walkways that are already addressed in GBC Local Plan Strategy and Sites Policy A25 (6). If retained, this policy needs to be more closely aligned with the wording of GBC Local Plan Strategy and Sites Policy A25 (6). Beyond the site boundary or the developer’s land ownership, it may be private land and a question of funding Surrey County Council to improve footways.</b></p>	<p>The WCNP Policy has been reworded to reference the relevant Guildford Local Plan policy and provide more information on a specific scheme.</p>
<p><b>Policy 2 (2.7)</b>  <b>5.9 The strategic gap identified in Policy 4 consists of all Green Belt land between the village of West Clandon and the edge of Gosden Hill Farm (Site allocation policy A25). As Green Belt, development is considered inappropriate unless it is</b></p>	<p>This section has been deleted from this Policy.</p>

<p>one of the exceptions listed in paragraph 145/146 of the NPPF. Policy P2 in the LPSS is consistent with the NPPF. This policy is inconsistent with both the NPPF and LPSS as it could restrict development that is not considered inappropriate in the Green Belt. In addition, a strategic gap is a strategic matter. NPPF para. 18 states that NPs can only contain non-strategic policies. This policy does not have regard to the NPPF and therefore does not meet basic condition a. This criterion should be deleted.</p>	
<p><b>Policy 2 (2.8) (Pocket Parks, Wildlife corridors etc)</b>  <b>5.10</b> This criterion could be more effective with some redrafting. It is recommended that 'where appropriate' is removed and that developments are expected to provide the wildlife areas unless demonstrated to be inappropriate. Examples of wildlife corridors could also usefully be provided, including hedgehog runs and gaps in fencing.</p>	<p>Changes made as suggested.</p>
<p><b>Policy 2 (2.9) (Car Parking)</b>  <b>5.11</b> See response to Policy 1.12 above.</p>	<p>Car Parking Policy deleted from this section but included as separate Policy 8, below</p>
<p><b>Policy 2 (2.11) (Adequate Community Facilities)</b>  <b>5.12</b> This criterion could be more effective with some redrafting. It is recommended that 'adequate' is defined with the use of some local knowledge and evidence with regards to what community facilities are required in the area. Otherwise, the criterion adds little beyond that required in the Local Plan. As such, it may be better positioned within the aspirational policies section with a proposed set of community facilities that are needed in the Neighbourhood Area.</p>	<p>Policy revised with more detail provided.  .</p>

**Policy 3 Other developments outside West Clandon Village Settlement and Conservation Areas**

**6.1 Policy 3 outlines design criteria for development within the Neighbourhood Area but which falls outside of the identified village settlement area and Conservation Areas (and therefore outside of the scope of Policies 1 and 2). Policy 3 (3.1)**

**6.2 This criterion places a high test of social benefit in order to justify any development outside of the identified village settlement area. It seeks to restrict any developments which could include extensions to dwellings or buildings for agriculture. This criterion is considered overly prescriptive and unnecessarily prohibitive.**

**6.3 This land is all designated as Green Belt. The tests for Green Belt development are set out in the NPPF and the Local Plan. Development is considered inappropriate unless it is one of the exceptions listed in the NPPF. However, the policy seems to permit development that would have “exceptionally high levels of justification and social benefit”. Some developments, such as the replacement of a building and buildings for agriculture and forestry, are not necessarily inappropriate in the Green Belt and it would not be reasonable to turn them down solely on the basis of lack of social benefit where they would bring environmental or economic benefits. This policy is not in accordance with national Green Belt policy and therefore does not meet basic condition a.**

**6.4 Consideration should be given as to whether this policy is necessary given the already significant protection conferred by Green Belt policy. If retained, it must be redrafted so as to not to undermine Green Belt protection or prevent appropriate development. As currently drafted this criterion should be deleted as it undermines Green Belt policy set out in the NPPF and Policy P2 of the LPSS. Policy 3 (3.2)**

**6.5 This criterion requires that development is well planned and integrated with its surroundings. These are outcomes that should be achieved through the application of design policies, rather than two policy criteria themselves. This should be deleted.**

**Policy 3 (3.3) (Significant development requires a masterplan)**

POLICY 3:

6.1, 6.2, 6.3 and 6.4: Policy 3.1 has been substantially redrafted to reflect these comments.

6.5 and 6.6 Policy 3 has been redrafted in the light of these comments.

6.7 Replaced with new Policy 8.

**6.6 There is no definition provided as to what constitutes a significant development. "Significant" should be defined within the supporting text as currently there is no indication as to what level of development the criterion should apply to. The requirement for a masterplan is considered onerous. LPSS Policy D1 requires masterplans for the strategic sites only. This criterion could be aligned with the local plans by substituting "strategic" for "significant". However, this would simply repeat Local Plan policy. The level and type of supporting infrastructure will be assessed as part of the planning application process on a site by site basis.**

**Policy 3 (3.6)**

**6.7 See response to Policy 1.12 above.**

**Policy 4 Views and strategic gaps**

**7.1 Policy 4 seeks to outline protection for specific areas of land that are proposed to constitute a 'strategic gap', and a series of views.**

**7.2 As a general comment the Views referred to in this policy should be clearly identified on a map, which should be provided below the Policy. If the proposed Strategic Gap is retained, it should also be demonstrated on a map and provided below the Policy text (however, it is recommended for the reasons outlined previously that the strategic gap is not taken forward).**

**Policy 4 (4.1)**

**7.3 This criterion seems to simply replicate Green Belt policy protections on an area of land that is already designated Green Belt. This is set out in the NPPF and amplified by policy P2 of the LPSS. As such, this criterion is unnecessary duplication and should be removed.**

**Policy 4 (4.2)**

**7.4 This is not a policy that is used in determining planning applications and should be deleted. As set out in the NPPF, any amendments to Green Belt boundaries should be undertaken as part of preparing a local plan and should only be done in exceptional circumstances. This criterion also relies on the tract of land in question being identified as a strategic gap. The Council does not consider that this area of land can be designated as such and the policy should therefore be removed.**

**Policy 4 (4.3)**

**7.5 Whilst the positive wording of this criterion is welcomed, the policy has misinterpreted the treatment of development within the Green Belt set out in the NPPF. The test for development that is considered to be inappropriate in the Green Belt is "very special" circumstances, not "exceptional". Forms of development that are not considered inappropriate in the Green Belt do not need to demonstrate very special circumstances. This criterion is more restrictive than national policy and should be deleted.**

**Policy 4 (4.4)**

**7.6 The establishment of woodland trusts is not a land-use policy and not something that the planning system can restrict, enable or influence. As such,**

**New POLICY 4**

**7.2 Views are now clearly identified with arrows on a map in the revised Character Assessment.**

**7.3 Agreed.**

**7.4 Policy 4.2 to be moved to the supporting text and reworded.**

**7.5 Policy 4.3 has been substantially revised taking account of the comments made and following a review of other similar policies on sensitive 'gaps' adopted in Neighbourhood Plans in the area.**

**7.6 Agreed.**

**7.7 Wording suggested agreed and revised with additional references to relevant Surrey and Guildford Landscape Assessments.**

<p><b>this criterion must be removed from the statutory part of the plan. It could be provided in the aspirational policies section.</b></p> <p><b>Policy 4 (4.6)</b></p> <p><b>7.7 This criterion should be joined with the rest of the Policy, rather than separated from it as this could cause confusion. The criterion may be considered overly prescriptive in its current form and may benefit from redrafting to include: “Development proposals that would cause an unacceptable impact on these views will be refused”. It would be unreasonable to expect that no negative impact whatsoever should be caused by even minor development in its setting.</b></p>	
<p><b>8 Policy 5 Community facilities</b></p> <p><b>8.1 Policy 5 sets out a list of criteria that seek to protect and enhance community facilities within the Neighbourhood Area.</b></p> <p><b>8.2 The sub-criteria listed below Policy Criterion 5.1 could helpfully be listed in a different format, perhaps with numerals, in order to highlight that they are a distinct subset of criteria relating to point 5.1.</b></p>	<p>Agreed.</p>
<p><b>Policy 5 (5.1)</b></p> <p><b>8.3 The positive nature of this policy is welcomed.</b></p> <p><b>8.4 Criterion 5.1.2 could helpfully include the provision that the viable small retail units should be “appropriately located”.</b></p> <p><b>8.5 Criterion 5.1.3 seems to extend beyond the remit of simply community facilities and could usefully be moved to Policy 1, 3 and 4 instead (or alternatively elaborated as its own separate policy). Local Plan Policy D1 does already address this in a wider context, where Fibre to the Premises (FTTP) broadband provision is covered. This criterion could be usefully strengthened accordingly.</b></p>	<p>Agreed but 5.1.3 has been retained as 5 (v) as this was a significant issue for residents responding to the resident’s survey.</p>
<p><b>Policy 5 (5.3)</b></p> <p><b>8.6 The drafting of this criterion may be confusing to the various audiences that are intended to use this document. In order to provide more accessible wording, the criterion may usefully be redrafted as follows:</b></p> <p><b>“The loss of local buildings of historic interest (See Character Appraisal, Appendix 1, Page 10) is not supported. Development that is beneficial to local buildings of historic interest is supported.”</b></p>	<p>Agreed.</p>
<p><b>9 Policy 6 Biodiversity and environment</b></p>	

<p><b>9.1 The policy seeks to promote biodiversity and improvements to the natural environment within the Neighbourhood Area. This is strongly supported and aligns with policy ID4 of the local plan. The focus on maximising potential for biodiversity through landscaping and on open space is particularly welcome and accords with emerging development management policy.</b></p> <p><b>Policy 6 (6.1)</b></p> <p><b>9.2 The focus on maximising potential for biodiversity through landscaping and on open space is particularly welcome. It accords with emerging development management policy.</b></p>	<p>Noted.</p>
<p><b>Policy 6 (6.2)</b></p> <p><b>9.3 This criterion could be redrafted to make it more effective. It is recommended that ‘Where possible’ is removed and development proposals are expected to integrate nesting boxes, etc, into the development unless there is specific justification not to do so.</b></p>	<p>Agreed.</p>
<p><b>Policy 6 (6.4) (restrictions on hard landscaping)</b></p> <p><b>9.4 The aim of this policy is supported. However, generally planning permission is not required to remove vegetation so there is little that policy can do to prevent the removal of vegetation before developers seek consent (thereby negating the policy). The policy could be more effective if it steers development towards a leafy and verdant character, and/or if it aligns with the emerging national and local approach to biodiversity net gains and requires developments to provide “net gains in biodiversity” rather than avoiding “reduction in vegetation”.</b></p>	<p>Policy redrafted.</p>
<p><b>Policy 7 Protected open space</b></p> <p><b>10.1 Policy 7 addresses the provision of and protection of open space within the Neighbourhood Area.</b></p> <p><b>10.2 The numbering of the criteria in this policy is different to the rest of the policies within the Plan and this should be amended to avoid confusion. Please see comments on numbering in “general comments on the plan”.</b></p>	<p>Agreed.</p>
<p><b>10.3 The policy itself doesn’t specify requirements with regard to the proposed Local Green Spaces. The text reads more like a justification as to the inclusion of the sites within the Local Green Space designation than policy covering development on the spaces.</b></p>	<p>Proposed insertion accepted.</p>

<p><b>10.4 It is not necessary to set out development policy for Local Green Spaces. Instead the policy can simply state something along the lines of “The following spaces are designated as Local Green Spaces...” followed by a list of the spaces and a reference to the relevant map(s). This means that the spaces will be identified as important local spaces and protected in line with the NPPF, which confers protection commensurate with Green Belt. However, neighbourhood plans frequently include a bespoke policy for protecting Local Green Spaces and it is recommended that, as a minimum, the policy should include a caveat that development will be acceptable on Local Green Spaces where it is beneficial to the purpose for which the space is used, e.g. engineering works to improve drainage or improvements to fixed facilities or parking.</b></p>	
<p><b>12 Delivery Plan: Infrastructure projects</b>  <b>12.1 Some of these infrastructure projects are capable of becoming planning policies. For example, the plan could include a policy that supports development that provides additional facilities for young people or development that improves the village hall. It is recognised that Infrastructure Project (iii) has synergy with scheme LRN21 in the Guildford Borough Local Plan: Strategy and Sites.</b></p>	<p>Agreed.</p>
<p><b>13 Appendix 1 Character areas and protected views</b>  <b>13.1 This document sets out a description of West Clandon. It gives a brief history and identifies eight specific character areas.</b>  <b>General comments about Appendix 1</b></p> <p><b>13.2 Text in documents is often referred to within planning decision and appeal documents, and the examiner of the plan will need to refer to specific text in his or her report. This will be much easier if there is distinction between each of the eight character area sections and every paragraph has a number. If text includes a list or bullet points, it’s entries can be assigned letters. Maps should also be numbered and titled for ease of reference, and have accurate coloured zoning for each of the character areas. It would be helpful to mark or annotate each of the individual character area maps with key features such as listed buildings/ public footpaths/ key views (including direction of view).</b></p>	<p>Agreed.</p>

<p><b>13.3 It would also be useful if all photos are annotated, describing what they are and what they show or illustrate. Additional photos relating to the context of what is being discussed and the character of the area would help.</b></p>	
<p><b>Potential Risk Section</b>  <b>13.4 This does not form part of a character assessment and therefore should not be included. A character assessment is a document that describes the distinct appearance and feel of a settlement or an area. It communicates the key physical features and characteristics that combine to give a particular settlement or an area its local distinctiveness and unique identity. By preparing a character assessment which highlights those features (views/scale/materials landscape etc...) of importance to the local character of the village/area should help to inform what policies are required to protect and enhance.</b></p>	<p>Agreed.</p>
<p><b>13.5 The current content is too general for planning purposes</b></p>	<p>More detail has been added to the text.</p>
<p><b>Views</b>  <b>13.6 Consideration needs to be given to all views including external, internal, glimpsed, gapped and backdrop views not just external. Identified views are currently difficult to understand. It is not easily clear as to where they are, what direction they are formed and whether they are private or public.</b></p>	<p>Additional detail has been included and arrows etc. added to the diagrams in the Character Assessment to clarify.</p>
<p><b>Density</b>  <b>13.7 This is not really discussed within the document, could be useful to provide details</b></p>	<p>Some further references included where appropriate.</p>
<p><b>Architectural detailing</b>  <b>13.8 Information on this subject seems to be limited to those areas where there are more traditional properties. Details across the more modern developments should not be ignored. Window sizes &amp; styles, presence of chimney stacks, the use of tile hanging, presence of dormers etc. should be noted.</b></p>	<p>There are few modern buildings to reference but some additional detail included in Character Assessment.</p>