

Policy/Statutory Consultee	Regulation 14 Statutory Consultees - Key Issues / Comments
<p>General Comments</p> <p>Iceni obo Ptarmigan Land</p>	<p>Iceni are instructed by Ptarmigan Land to submit representations to Lovelace Neighbourhood Plan Group on the Draft Lovelace Neighbourhood Plan (2018) published for consultation on the 6th September 2018.</p> <p>1.2 Our client is working to deliver a sustainable, residential-led development on the land at Garlick’s Arch, Send Marsh (identified on the Indicative Framework drawing included at Appendix 1), which is located immediately to the northwest of the A3 trunk road and to the southeast of Portsmouth Road, on the southeastern edge of Send Marsh.</p> <p>1.3 We recognise the merits of neighbourhood planning in enabling communities to shape the areas in which they live and work in promoting new sustainable development. The plan should empower local people to set out a positive vision for how they want their community to be developed over the plan period in line with the emerging Local Plan.</p> <p>1.4 We provide our comments below in the context of the requirement for the Plan to meet the ‘basic conditions’ set out in Schedule 4B to the 1990 Town & Country Planning Act (as amended) and other relevant legal requirements, specifically:</p> <ul style="list-style-type: none"> a) The plan’s compliance with national policy and advice contained in guidance issued by the Secretary of State; b) How the plan contributes to the achievement of sustainable development; c) The general conformity of the plan with the strategic policy of the development plan for the local area; d) The compatibility of the plan with EU and human rights obligations. <p>Iceni have reviewed the Draft Neighbourhood Plan Consultation Version (2018) in line with the client’s and Guildford Borough Council’s future aspirations for the Garlick’s Arch site. Accordingly, our client is not seeking significant alterations to the Draft Plan, rather respectfully requesting minor alteration to elements of the policy wording to ensure that the policy position within the Neighbourhood Plan aligns with the latest Main Modifications proposed to the Guildford Local Plan which reflects the GBC’s and the Inspector’s latest conclusions, and meets the ‘basic conditions’ summarised above.</p> <p>Having reviewed the current consultation document, we provide comments below on a number of relevant policies included in the latest draft of the Lovelace Neighbourhood Plan. We would be pleased to discuss these representations in further detail with the Neighbourhood Plan Group in due course.</p> <p>Our client controls land either side of the A3 which forms part of two allocations in the draft Local Plan (2018) identified by Policy A43 as ‘Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley’ and Policy A43a as ‘Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common’. This land is identified within the enclosed Indicative Framework drawing at Appendix 1.</p>

	<p>The site is located immediately to the northwest of the A3 (Ripley Bypass), on the southeastern edge of Send Marsh, approximately 2km to the southwest of Ripley and 6km to the northeast of Guildford, with the eastern part of the site falling within the Lovelace Neighbourhood Plan area. The site largely comprises agricultural land, with a relatively small area of commercial land in the centre of the site.</p> <p>High voltage electricity pylons run through the centre of the site across its full length. A substantial tree belt, comprising an element of ancient woodland, screens the northwestern corner of the site, with another patch of woodland located on the southeastern boundary with the A3. A small brook also runs through the eastern portion of the site.</p> <p>We have submitted a number of representations on behalf of our client and undertaken extensive engagement with Guildford Borough Council on the draft allocation. Recently we represented Ptarmigan Land at the Examination, following which the Inspector provided an initial indication that the Plan including the draft allocation was sound subject to modifications agreed with Guildford Borough Council, which included an uplift in housing numbers at Garlick’s Arch from 400 homes in the original version of Policy A43 to 550 dwellings now proposed.</p> <p>We welcome the proposed allocation of this site in the latest draft of the Guildford Borough Local Plan (incorporating the proposed Main Modifications recently consulted upon) for residential-led development and understand that the Neighbourhood Plan takes account of this allocation. We set out below our support for the broad strategy and specific elements of the draft Neighbourhood Plan. Where appropriate we have made suggested alterations to the proposed policies and supporting text where we consider that these would assist in meeting the basic conditions and ensuring alignment with the latest position within the Guildford Borough Council Draft Local Plan (2018).</p> <p>We welcome the opportunity to work constructively and collaboratively with the Neighbourhood Plan Group to shape the emerging Plan further. Our client is broadly supportive of the proposed strategy as set out within the current consultation draft Neighbourhood Plan. However, as detailed above there are certain aspects which we would encourage the Group to consider further in order to ensure that all the proposed policies are robust and meet the ‘basic conditions’, having regard to Schedule 4B to 1990 Act.</p> <p>We therefore respectfully ask that our comments are taken into account and that the necessary modifications are made to strengthen the Plan.</p> <p>Please do not hesitate to contact Icen Projects should you wish to discuss any of these matters further.</p>
<p>Surrey Wildlife Trust</p>	<p>Thank you for this opportunity to comment on the Pre-submission Draft of your emerging Neighbourhood Plan. Please consider these comments as those of the Surrey Wildlife Trust, and also as submitted on behalf the Surrey Nature Partnership.</p> <p>Page 12 (and elsewhere, including on pages 15 and 51). SNCI refers to <i>Sites of Nature Conservation <u>Importance</u></i>, and not <i>Interest</i>.</p>

	<p>Pages 15-16. It would perhaps be more accurate to say; “<i>Papercourt Lake in Newark Lane, together with two areas of the floodplain alongside the River Wey are designated and regulated by Natural England as parts of the composite SSSI called Papercourt. The three open water areas of Papercourt SSSI Lake are all former gravel workings, and have become artificial lakes, the largest used by a sailing club and fishermen. The large meadow to the west of Papercourt Lock, the only one of its type in Surrey, supports a variety of plants life, some quite rare.</i>”</p> <p>Ockham. “<i>..approximately 335 acres [perhaps better expressed as hectares?] of Surrey heathland and is designated as part of the Thames Basin Heaths SPA, is also SSSI and a LNR LNR.</i>”</p> <p>“<i>Three Farms Meadows, the land around the former airfield, is designated has been formally selected as a SNCI.</i>”</p> <p>Wisley. “<i>..The commons in Wisley and Ockham are managed by Surrey Wildlife Trust, a wildlife conservation charity and environmental NGO.</i>” Floodplain is one word. Wisley Common is also part of the Ockham and Wisley Commons SSSI, and Ockham and Wisley LNR.</p> <p>To check the exact nomenclature, overlap and relationship of these designations to one another we recommend you visit https://designatedsites.naturalengland.org.uk/ (relevant also at page 50).</p> <p>Page 20. “<i>..The rural areas have visitor car parks at Boulder Mere Boldermere,..</i>”</p> <p>Page 35. The objectives of the Lovelace Neighbourhood Plan for the Environment (4.2), are welcomed, especially “<i>Retain and increase the local biodiversity assets</i>”.</p>
<p>Guildford Borough Council</p>	<p>The purpose of this document</p> <p>1.1 The Lovelace Neighbourhood Plan Group (LNPG) has produced the draft Lovelace Neighbourhood Plan (LNP) 2019-2034. The plan is currently subject to consultation in order to meet the requirements of regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) (the regulations). This document comprises Guildford Borough Council’s (the Council) representation for the consultation.</p> <p>1.2 The comments contained within this document are provided in order to improve the prospect of a positive result at examination and to ensure the plan accords with the emerging borough strategy.</p> <p>2 Background information</p> <p>2.3 An online version of the 2003 Local Plan proposals (policies) map can be accessed via http://www.guildford.gov.uk/planningmap</p> <p><u>The NPPF and PPG</u></p>

	<p>2.4 The most relevant sources of policy and guidance referred to in basic condition a are the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).</p> <p>2.5 The NPPF was updated in July 2018, but plans at examination will be judged against the previous NPPF March 2012 if they are submitted to the Council under regulation 15 on or before 24 January 2019. It is not clear when the LNP will be submitted, and which version of the NPPF will apply at examination. The NPPF 2018 sets out national planning policy and the LNP should have appropriate regards to its policies regardless of the likely submission date as the LNP will be used to inform planning decisions within a planning context set by the NPPF 2018.</p> <p>2.6 The government's view on what constitutes sustainable development (as referenced in basic condition b) is set out in the NPPF. The NPPF promotes growth and requires plans to set out a positive vision for development.</p> <p>2.7 The NPPF and PPG require plans to be clear and unambiguous. As such, policies should be written in such a way that is clear for applicants for planning permission and planning decision makers.</p> <p>2.8 Neighbourhood plans must be based on proportionate and robust evidence (PPG, neighbourhood planning paragraph 40) that is adequate, relevant and up-to-date (NPPF 2018, para. 31).</p> <p>2.9 Plans should be deliverable (NPPF 2018 para. 16, PPG Neighbourhood Planning para. 5), which means that where policies set requirements they should be implementable for the Council and achievable for applicants.</p> <p><u>The emerging local plan and evidence base</u></p> <p>2.10 The Council submitted the Submission Local Plan: Strategy and Sites to the Secretary of State for examination in December 2017. The examination is currently ongoing and a further version has been produced: the Local Plan: Strategy and Sites – Main Modifications (the LPMM). The LPMM primarily deals with strategic matters and largely does not go into detailed development management matters.</p> <p>2.11 The LPMM has been found sound, subject to a number of modifications, and accordingly carries considerable weight. The neighbourhood plan should have regard to the LPMM and the Local Plan evidence base.</p> <p>2.12 The NPPF and PPG require the ambition of neighbourhoods to be aligned with the strategic needs and priorities of the wider local area.</p> <p>2.13 The PPG (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</i></p>
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	<p><i>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>2.14 The strategic needs and priorities for the wider local area are set out in the LPMM and its evidence base. The ambition of the neighbourhood plan should be to assist in meeting these needs.</p> <p>2.15 The NPPF 2018 clarifies that neighbourhood plans should contain only non-strategic policies (see paragraphs 13 and 18 and the glossary definitions of non-strategic policies and strategic policy-making authorities).</p> <p>3 General comments about the plan</p> <p>3.1 The plan uses positive wording that supports the right kind of development. This approach is supported.</p> <p>3.2 There is some ambiguity over some of the terms used in the plan. In particular, there is variation in the use of the term “major development”. The NPPF defines major development as:</p> <ul style="list-style-type: none">▪ residential developments of 10 or more homes or an area of 0.5 hectares or more, and▪ non-residential development of 1,000 sqm or more additional floorspace or a site of 1 hectare or more. <p>The LNP should use the term “major development” in the same way to avoid confusion.</p> <p>3.3 The LNP introduces terms such as “large scale major development” and “significant major development”. These must be clearly defined and used consistently throughout the document.</p> <p>3.4 The size of the plan is considerable. Some of the appendices may be more appropriately provided as supporting documents (for example, the detailed survey results).</p> <p>3.5 Maps should be included in the body of plan, adjacent or near to the policies that refer to them, rather than at the end of the document in an appendix. This makes the plan more readable and provides clarity over where policies are intended to apply. If any maps are not referred to in the plan, they do not need to be in the plan at all (for example, the map of stations at Appendix 5).</p> <p>3.6 The document includes photographs of cars. It is suggested that number plates are blurred or blanked out.</p> <p>3.7 Some of the chapters use acronyms. These are explained in the glossary, but should also be explained in the document to improve legibility.</p>
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	<p>3.8 Some of the maps and images used in the plan appear to be extracts from other documents. Where this is the case, references and copyright information (if applicable) must be provided. All images that use OS basemaps should include OS copyright information. The Council can help with this if required.</p> <p>3.9 The plan includes largely criteria-based policies, which often have sub-criteria. However, all the criteria are listed with the same numbering format (e.g. 1), 2), 3)). This can be difficult to follow as the sub-criteria are not clearly identified. To improve clarity, sub criteria should use a different numbering system (e.g. i, ii, iii or a, b, c) and be indented differently, as in the example below:</p> <p><i>Development proposals must meet the following criteria:</i></p> <ul style="list-style-type: none"> 1) Criterion 1 2) Criterion 2 a. Sub criterion 1 b. Sub-criterion 2 c. Sub-criterion 3 3) Criterion 3... <p>4 Introductory sections</p> <p>4.1 The last paragraph on page 22 contains negative comments about a specific individual who is identifiable from the description. This information has no real relevance to the plan and it is strongly recommended that it is removed. The Council will likely have to redact this section in the submitted plan if it is retained.</p> <p>4.2 Page 23 discusses school provision. For completeness, the text should include information about the proposed primary and secondary schools on the Former Wisley Airfield site, which includes two forms of entry needed for the wider area.</p> <p>4.3 Some of the introductory sections (particularly the Constraints and Challenges section) contain language that is highly subjective and in some cases pejorative. There are negative comments about the emerging Local Plan, which are unlikely to convince the examiner that the LNP is planning positively to support the emerging strategic policies and that the LNP aligns with the strategic needs of the borough, as required by the NPPF and PPG. The negative tone in places may not meet the NPPF requirement for plans to be positively prepared. The text should be rewritten as an objective assessment of the neighbourhood area and the challenges it faces in order to inform the plan and provide context. Much of the information provided is superfluous and could be removed.</p>
	<p>Executive Summary</p>
	<p>1.1. The Lovelace Neighbourhood Plan (LNP) cannot proceed in its present form, as it is unlikely to be found sound at Examination as it is not consistent with the emerging Guildford Borough Local Plan (eGBLP). Modifications are required, which in the opinion of Wisley Property Investments Ltd (WPIL) should result in a re-consultation of the Plan. The eGBLP is</p>

<p>Savills obo Wisley Property Investments Ltd (WPIL)</p>	<p>significantly advanced and has been through the majority of the Examination Hearings. Given the likely timescales for progressing the LNP, it is highly probable that the eGBLP will be adopted prior to the adoption of the LNP. Therefore, it is not constructive or time efficient for the Neighbourhood Plan (NP) Group to progress a plan that is not consistent with the eGBLP and this would be contrary to the NPPF. In addition;</p> <p>1.2. The LNP includes a significant amount of text which is not considered to be relevant to the LNP or its policies. This should be refined to ensure that the LNP does not include information which is not relevant to the Plan itself. The LNP should be focused on policies to regulate the use of land, and to cause an affect. Background detail can be left to supporting documents;</p> <p>1.3. There is reference to Former Wisley Airfield as “Three Farms Meadow” (TFM) and a general negative tone in the LNP in respect of this strategic development which is a key part of the eGBLP. As, on adoption, the LNP will form part of the development plan for the area it is not appropriate for such a tone to be adopted within the Plan which should be a positively prepared mechanism to manage change or conservation. ‘TFM’ is not an officially recognised name, and reference to it will simply cause confusion and risk ambiguity;</p> <p>1.4. In respect of the housing and transport polices within the LNP, these are not clear and do not relate to strategic sites allocated within the LNP by the eGBLP. It must be made clear that the majority of the LNP does not (and cannot) affect the strategic designation A35 at the Former Wisley Airfield; and</p> <p>1.5. In respect of some environmental policies within the LNP, greater appreciation of the evidence base is required.</p> <p>1.6. The specific comments and objections made by WPIL are set out below and are in the order which they appear within the emerging LNP. Whilst WPIL’s strong preference is for a pause in the LNP production (to allow for the adoption of the eGBLP), and inclusion of an overarching policy which makes clear that the LNP is not relevant for Allocation A35 (Wisley New Settlement), another option is to insert amendment policies and supporting text throughout the plan which makes this clearer. This has been provided in these representations.</p> <p>1.7. WPIL are willing and able to meet GBC and the LNP steering group to discuss these concerns in greater detail.</p> <p>2. Introduction & Background</p> <p>2.1. This representation is made on behalf of Wisley Property Investments Ltd (WPIL). WPIL are the owners and promoters of the Land at Former Wisley Airfield, which is located within the Lovelace Neighbourhood Plan designated area.</p>
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	<p>2.2. Former Wisley Airfield is included within the emerging Local Plan (eGBLP) for Guildford Borough Council (GBC) as one of the strategic allocations. The site makes up the vast majority of the land included within emerging Allocation A35. WPIL are working alongside the landowners of the remaining land at Bridge End Farm and their agents.</p> <p>2.3. Emerging Allocation A35 allocates the site for:</p> <ul style="list-style-type: none">▪ Approximately 2,000 homes (C3), including some specialist housing and self-build plots and▪ Approximately 100 sheltered/Extra Care homes (C2 use) and▪ 8 Gypsy and Traveller pitches and▪ Approximately 1,800 sq m of employment floorspace (B1a) and▪ Approximately 2,500 sq m of employment floorspace (B2/B8) and▪ Approximately 500 sq m of comparison retail (A1) and▪ Approximately 600 sq m of convenience retail (A1) and▪ Approximately 550 sq m services in a new Local Centre (A2 –A5) and▪ Approximately 500 sq m of community uses in a new Local Centre (D1) and▪ A primary school (D1) (two form entry) and▪ A secondary school (D1) (four form entry, of which two forms are needed for the housing on the site and two for the wider area) <p>2.4. The eGBLP is currently being examined by Planning Inspector Mr Jonathan Bore, with Hearings held in June/July 2018, including a hearing on Allocation A35 held on 5th July 2018. At the end of this hearing session the Inspector verbally confirmed that Allocation A35 was sound. The eGBLP was subject to a Main Modification Consultation which ended on 31st October 2018. Only minor amendments have been made to Allocation A35. GBC are expected to adopt the eGBLP in January to June 2019.</p> <p>2.5. GBC have stated that they are now giving significant weight to the eGBLP in light of the Inspectors conclusions at the Hearings. This is a key consideration for the LNP. In light of this we have drafted out representation in line with Main Modifications Local Plan (October 2018) and assumed that this version of the eGBLP will be adopted in due course.</p> <p>Section 1 – Introduction</p> <p>Objection, Paragraph 1.1:</p> <p>4.4. Paragraph 1.1 sets out that the LNP would be “<i>sensible</i>” to have regard of emerging eGBLP. WPIL object to this and as outlined above, the eGBLP should be given significant weight. This is clear in planning policy and law.</p>
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	<p>4.5. <u>Change required</u>: it is fundamental that throughout the LNP, it is made clear that it is in accordance with the eGBLP, and does not seek to repeat nor replicate the strategic policies therein. This paragraph should be reworded to (new text underlined): Representation to Regulation 14 Consultation Former Wisley Airfield Wisley Property Investments Ltd November 2018</p> <p><i><u>“The Lovelace Neighbourhood Plan (LNP) must be in general conformity with the strategic policies of the adopted GBC 2003 Local Plan (GBC 2003 LP), and has had regard to the GBC Emerging 2017 Local Plan (GBC 2017 LP) which will shortly be adopted. The LNP does not seek to replicate or repeat any policies within the GBC 2017 LP or to influence any of the strategic allocations.”</u></i></p> <p>Support, Paragraph 1.4:</p> <p>4.6. Paragraph 1.4 outlined that there is a presumption that the LNP cannot interfere with strategic site selection. This is supported by WPIL in respect of Former Wisley Airfield (emerging Allocation A35).</p> <p>4.7. <u>Change Required</u>: In addition to paragraph 1.4, the following Policy should be added to the LNP in order to ensure that the LNP does not conflict with the eGBLP or its strategic allocations (new text underlined):</p> <p><i><u>“Policy G.1 Application of Policies</u></i> <i><u>The Lovelace Neighbourhood Plan is a non-strategic plan and therefore the policies within the Plan do not apply to the strategic allocation at Former Wisley Airfield (Allocation A35 – Guildford Borough Council Local Plan) or any other strategic allocation within the LNP designated area.”</u></i></p> <p>Section 2 – Lovelace Profile</p> <p>Objection, Paragraph 1:</p> <p>4.8. Paragraph 1 sets out that that the LNP area is made up 100% of the Green Belt, WPIL highlight that under the eGBLP areas of the NP area are planned for release from the Green Belt. This statement would therefore become out of date on adoption of the eGBLP, and would benefit from clarity. In addition, the relevant plans in the LNP will need to be updated.</p> <p>4.9. <u>Change required</u>: The plan should accurately reflect the eGBLP. This could include the following wording (new text underlined): <i><u>“The majority of Lovelace is within the London Metropolitan Green Belt, however, the Guildford Borough Local Plan will release a number of sites from the Green Belt, including Former Wisley Airfield”</u></i></p> <p>Objection, 2.1, Paragraph 7</p>
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4.10. Under section 2.1 within paragraph 7 and elsewhere in the LNP there are references which appear to link the Former Wisley Airfield site to the Area of Outstanding Natural Beauty (AONB) (Surrey Hills). Such references are incorrect and do not reflect the finding of the Appeal Inspector nor the available evidence base. Paragraph 7 sets out:
“However, a major challenge to the rural character of Ockham is the zoning in GBC’s 2017 LP of a new town of some 2,000+ dwellings at Three Farms Meadows, (Section 3.6), a site roughly in the centre of the necklace of eight hamlets, situated on a ridge overlooking the surrounding area and facing the AONB. The outline planning application includes five-storey blocks of flats, which would change the landscape and character of the village. This is a controversial site and was the subject of a five-week Inquiry in September-October 2017, brought about by the site owners, which upheld GBC’s Planning Committee decision to refuse planning permission. However, GBC had included this site as a site to be removed from the Green Belt in their 2017 draft Local Plan”

4.11. Change required: It must be made clear in the LNP that there is no association with the Surrey Hills AONB and Former Wisley Airfield in the evidence. Paragraph 7 should be reworded to (new text underlined):
“In the future, the rural character of Ockham will be altered by the allocation of Former Wisley Airfield in GBC’s 2017 LP for a new village town of some 2,000+ dwellings at Former Wisley Airfield, (Section 3.6), a site roughly in the centre of the necklace of eight hamlets. The original outline planning application, which was dismissed at Appeal by the Secretary of State included five-storey blocks of flats, which would change the landscape and character of the village. This is a controversial site and was the subject of a five-week Planning Appeal Inquiry in September-October 2017, brought about by the site owners, which upheld GBC’s Planning Committee decision to refuse planning permission. However, the Appeal Decision of the Secretary of State confirmed that there were no fundamental constraints of the Site and GBC continue to include this site as a strategic allocation for removal from the Green Belt in their emerging Local Plan.”

Objection, 2.2.1 Paragraph 8 Ancient Woodland

4.12. The reference to Ancient Woodland needs to be accurate. Paragraph 8 sets out that:
“Ancient woodlands are situated at Hatchford End and alongside the A3, both in Ockham, and there is open farmland throughout the ward.”

4.13. The LNP must refer to the Natural England Provisional Ancient Woodland Inventory. This is for a technical reason as woodland being included in Surrey’s revised ancient woodland inventory does not necessarily mean that it is ancient.

4.14. Change required: This paragraph is therefore inaccurate and should be revised to:
“There are areas of woodland at Hatchford End and alongside the A3, both in Ockham which are on the Natural England Provisional Ancient Woodland, and there is open farmland throughout the ward.”

Objection, 2.2.1 Paragraph 7 Ockham SNCI

4.15. Section 2.2.1 paragraph 7 outlines that: “*Three Farms Meadows, the land around the former airfield, is designated SNCI*”. WPIL object to this statement which implies that the wider Airfield site is designated as such. This is not reflective of the most up to date evidence submitted to GBC and made public through the appeal proposals. Paragraph 7 is not correct and does not reflect the most recent version of the eGLP (Main Modifications 2018) and the Statement of Common Ground between the WPIL and GBC and the position of Surrey Wildlife Trust. The paragraph and any associated maps contained within the Appendices should be updated.

4.16. Change required: This paragraph should be revised to:

“as outlined within the eGLP, there are some areas of SNCI around Former Wisley Airfield, and as outlined in Policy A35 impact on these areas will be minimized where possible and mitigation provided. The position on the evidence base during the production of the Local Plan was agreed between GBC, Surrey Wildlife Trust and the landowners.”

Objection, 2.2.4 Air Quality

4.17. Section 2.2.4, Air Quality at paragraph 7 outlines that “*the A3/M25 interchange is a major source of pollution for biodiversity in general*”. WPIL object to this statement which is wholly inaccurate and is not supported by evidence. The majority of ‘biodiversity’ receptors are not sensitive to airborne pollution, and as demonstrated through evidence submitted as part of the Planning Appeal at Former Wisley Airfield whilst the surveys showed a number of monitoring sites in excess of environmental standards, the extent of such exceedances was more or less confined to the roadside, with no accompanying evidence of adverse effects on SPA vegetation or SPA bird populations.

4.18. Therefore, the statement in this paragraph in respect of air quality being ‘in excess of acceptable levels’ misrepresents the definition of an ‘environmental standard’ (critical load or level) which indicates when exceeded that harm may occur, not that it will. The LNP do not appear to have fully understood this issue and the text should be reworded to ensure it accurately portrays the current situation.

4.19. Change required: The plan should accurately reflect the available evidence. **Therefore, 2.2.4 should be deleted altogether.**

Objection, 2.3.1 Utilities

4.20. Section 2.3.1 Utilities sets out that: “*Thames Water has confirmed that there is unlikely to be an adequate clean water supply in this area to accommodate the level of development proposed by the GBC 2017 LP. Gas is available in parts of Lovelace, but not in some rural area*”. WPIL object to this statement and this directly contradicts the evidence presented in respect of the eGLP.

4.21. Change required: The plan should accurately reflect the available evidence. **Therefore, 2.3.1 should be deleted.**

Objection, 2.3.3. Public Transport

4.22. Section 2.3.3 Public Transport outlines the existing public transport within the neighbourhood plan area and at paragraph 4 outlines that “*for the foreseeable future, the main form of transport will remain the car*”. WPIL object to this statement as it demonstrates an absence of appreciation and no acknowledgement of planned public transport improvements arising from the Former Wisley Airfield new settlement, which has the potential to provide wider benefits to the communities within the NP area.

4.23. Change required: The plan should accurately reflect the eGBLP notably public transport improvements proposed by the Infrastructure Delivery Plan. This section should be reworded to (new text underlined):

“Lovelace is currently badly served by public transport and it has no direct rail links. Woking is the most popular station with fast services to London Waterloo, followed by West Byfleet, Horsley and Effingham Junction. Guildford station is not popular, mainly because of access via the problematic Guildford gyratory system. Currently all stations are typically reached by car and many people are dropped off, to be picked up later in the day.

The bus services are currently poor, or non-existent. The 715 Guildford and Kingston is approximately hourly, and ends by 8pm. The Woking buses (462/3) run twice a day and finish late afternoon.

Ripley village is served by the Guildford-Kingston route, whereas Wisley and Ockham currently have no direct bus service but can access the above from the A3.

Strategic Allocations within the eGBLP including at Former Wisley Airfield, are required to provide for sustainable transport and this includes the provision of a new bus service. However prior to this being secured, the current main form of transport to and from work, schools and village or town facilities will remain the car.

Objection, 2.3.4 Cycling & Walking

4.24. Section 2.3.4 outlines the cycling and walking opportunities in the NP area. In line with the comments made above, this section of the Plan demonstrates an absence of appreciation and no acknowledgement of planned improvements arising from Former Wisley Airfield new settlement which has the potential to provide wider benefits to the communities within the NP area. WPIL therefore object to this.

4.25. Change required: The plan should accurately reflect the eGBLP notably public transport improvements proposed by the Infrastructure Delivery Plan. The LNP should reflect the proposed enhancements to infrastructure outlined by the eGBLP. The following paragraph should be added to this section (new text underlined):

“Strategic Allocations within the eGBLP including at Former Wisley Airfield, are required to provide for new and improved walking and cycling infrastructure in the local area. The proposals also have the potential to improve accessibility with RHS Wisley through the Highways England RIS 1 scheme.”

Objection, 2.3.6 Community Facilities

4.26. Section 2.3.6 outlines the community facilities within the LNP area. In line with the comments made above, this section of the Plan demonstrates an absence of appreciation and no acknowledgement of planned improvements arising from Former Wisley Airfield new settlement, which has the potential to provide wider benefits to the communities within the NP area. WPIL therefore object to this.

4.27. Change required: The plan should accurately reflect the eGBLP, notably those strategic measures outlined by Allocation A35 and proposed by the Infrastructure Delivery Plan. The following paragraph should be added to this section:
“Strategic Allocations within the eGBLP including at Former Wisley Airfield and the GBC Infrastructure Delivery Plan, include requirements to deliver a range of community facilities. At Former Wisley Airfield specifically a new community facility will be provided alongside healthcare infrastructure, education and outdoor spaces. The delivery of this will improve access to community facilities in the local area.”

Objection, 2.3.8 Education

4.28. Section 2.3.8 outlines the current education provision in the LNP area. In line with the comments made above, this section of the Plan demonstrates an absence of appreciation and no acknowledgement of planned improvements arising from Former Wisley Airfield new settlement, which has the potential to provide wider benefits to the communities within the NP area. WPIL therefore object to this.

4.29. Change required: The plan should accurately reflect the eGBLP, notably those strategic measures outlined by Allocation A35 and proposed by the Infrastructure Delivery Plan. The following paragraph should be added to this section:
“Strategic Allocations within the eGBLP including at Former Wisley Airfield and the GBC Infrastructure Delivery Plan, include requirements to deliver new education facilities. At Former Wisley Airfield specifically a new primary and secondary school will be delivered. The delivery of this will improve access to education in the local area.”

Objection, 2.4.1. Local Employment Characteristics

4.30. Section 2.4.1 relates to Local Employment Characteristics, in the LNP area. In line with the comments made above, this section of the Plan demonstrates an absence of appreciation and no acknowledgement of the proposed employment and retail development proposed at Former Wisley Airfield new settlement, which has the potential to provide wider benefits to the communities within the NP area. WPIL therefore object to this.

4.31. Change required: The plan should accurately reflect the eGBLP notably those strategic measures outlined by Allocation A35 and proposed by the Infrastructure Delivery Plan. The following paragraph should be added to this section:

“Strategic Allocations within the eGBLP including at Former Wisley Airfield and the GBC Infrastructure Delivery Plan, include requirements to deliver retail and employment development. At Former Wisley Airfield specifically a new local centre will be delivered providing new retail and employment floorspace, this will provide new services and jobs. The delivery of this will improve access to retail facilities and employment in the local area.”

Section 3 Constraints and Challenges

Objection, 3.2

4.32. Section 3.2 is titled “*Introduction the Perfect Storm*” and outlines in 3 paragraphs a number of negative statements in relation to strategic development. WPIL strongly object to this inference, the Government and locally GBC are committed to delivery of new development including housing and infrastructure and this clearly supported within the NPPF (2012 and 2018). Whilst not forming part of a policy, this section does not represent in any form positive planning and should be removed.

4.33. Change required: This reference must be removed, as it adds nothing to the LNP. This section should be revised to (new text underlined):

“It is understood that strategic development sites are not within the remit of a Local Neighbourhood Plan “unless there is a specific local need to address them at Neighbourhood Plan level”. We acknowledge this applies to the Lovelace NP and this Plan therefore does not seek to alter or interfere with any strategic policies or allocation.”

To provide a balanced view of the area, and evidence of why our policies have been created, this section looks at the unique major constraints and challenges facing Lovelace over the next decade, with particular regard to severely increased traffic and air pollution.

Lovelace faces both opportunities and challenges during the next 10 years including the delivery of major projects either already approved or proposed over a short period of time. This includes projects led by government organisations such as Highways England (HE), SCC and GBC and other private developments. These will impact all 2,200 Lovelace inhabitants and any newcomers. The LNP wishes to ensure that the new development provides real benefits to the local community and local area and that any impacts are minimized and mitigated.”

Objection, 3.2.3 Traffic Congestion

4.34. Section 3.2.3 outlines the site allocations within the eGBLP. Following the examination of the Plan, GBC have proposed a number of main modifications and this section is therefore no longer up to date. This section also outlines that “*If all of these developments go ahead Lovelace will face 10-15 years of considerable traffic and infrastructure disruption together with the long-term permanent changes which will come from a quadrupling of the present population and major increase in vehicular traffic.*” The LNP offers no evidence to support this statement which is contradictory of the evidence submitted to support the eGBLP. WPIL object to this and this statement should be removed.

4.35. Change required: The plan should accurately reflect the eGBLP notably public transport improvements proposed by the Infrastructure Delivery Plan. This should be revised to read (new text underlined):

“If all of these developments go ahead Lovelace will face considerable traffic and infrastructure disruption during the construction phase and the development will create a long-term permanent change. The proposed developments must be delivered in line with the eGBLP and Infrastructure Delivery Plan in order to ensure that the impacts of development are mitigated, and the opportunity to enhance public transport is secured.”

Objection, 3.5 M25/A3

4.36. Section 3.5 outlines M25/A3 – Junction 10 Improvements which are being led by Highways England. This states that Highways England have not taken into account the proposed development at Former Wisley Airfield. WPIL have been in discussion with Highways England over the course of the Application and Appeal and GBC have engaged with them in respect to the eGBLP. The DCO for the scheme is proposed to take place in 2019, by which time the eGBLP will have been adopted and the proposed development at Former Wisley Airfield will therefore have to be taken account of. It is also important for the LNP to be aware that the Allocation A35 Former Wisley Airfield site is proposed to facilitate the DCO and to potentially enable improved access to RHS Wisley.

4.37. Change required: The plan should accurately reflect the eGBLP and evidence base associated with the proposed DCO of Junction 10 M25/A3. This should be revised to (new text underlined):

“Given the timing of the DCO for the RIS 1 Scheme, Highways England will be required to take account of the allocation of Former Wisley Airfield. In addition, there is potential for revised access to RHS Wisley to be secured through the DCO via the Former Wisley Airfield site.”

Objection, 3.6 Housing

4.38. Section 3.6 relates to the eGBLP in respect of the housing number and again reflects a now out of date version of the eGBLP, which does not take into account the Inspectors findings from the EiP. WPIL object to this and the negative language in which this section is written, which goes against the requirement in the NPPF to boost the supply of housing. As the LNP

	<p>group will be aware, there is planned to be a further Hearing session on the eGBLP, likely in January, to discuss the up to date housing evidence.</p> <p>4.39. Change required: The plan should accurately reflect the housing policy of the eGBLP. This section should be revised to read the latest position or adopted position (what ever is the most relevant):</p> <p><i>“A Strategic Housing Market Assessment (SHMA) for Guildford Borough was commissioned by the Borough Council as a foundation for the housing element of the new draft Local Plan and addressed the need for new dwellings at 654 per annum across the borough over a 15 year period. The SHMA draws upon population projections produced by the ONS and household projections produced by the Page 31 of 142 Department for Communities and Local Government as a baseline, and includes an uplift as required by the National Planning Policy Framework. <u>Through the Examination of the eGBLP the housing target for the Borough has been found to be [INSERT – Once January Hearings are completed].</u></i></p> <p>Objection 3.6.1. Former Wisley Airfield</p> <p>4.40. Section 3.6.1 relates to the Former Wisley Airfield and as outlined above WPIL object to the reference to the site as Three Farms Meadows (‘TFM’). This section of the LNP reads as an objection to the Site, which is wholly inappropriate for inclusion in a NP and could be construed to not be in line with the eGBLP and therefore it is highly likely to be found unsound. In addition, and as outlined above, the LNP makes inaccurate comments in respect of:</p> <ul style="list-style-type: none"> ▪ SNCI; ▪ Existing agricultural use of the site; ▪ Landscape features of the site and its surroundings including reference to AONB; and ▪ Impact on highway network. <p>4.41. Change required: The plan is not strategic, and hence should either have no direct references to Allocation A35 (Former Wisley Airfield), or where it is referred, should accurately reflect the eGBLP. Section 3.6.1. should also be deleted.</p>
<p>Housing (general)</p> <p>Guildford Borough Council</p>	<p>Housing policies, introductory text</p> <p>5.1 The introduction is labelled “96.1”. This should be “6.1”.</p> <p>5.2 The penultimate paragraph of the section (which begins “As the future of the significant sites...”) is now out of date where it discusses the consultation on revisions to the NPPF and should be rewritten to reflect the fact that the new NPPF has now been brought into force.</p>
<p>Savills obo WPIL</p>	<p>This section contains a background to housing development within the wider Borough and the LNP area. The NP Group should ensure that this is updated to reflect the most up to date evidence being produced to support the eGBLP. There is no policy which outlines a housing number for the LNP.</p>

<p>Changes to the Plan</p> <p>Introduction, Lovelace Profile, Constraints & Challenges, Vision and Objectives, Objectives and Policies</p>	<p><i>The premise of the Localism Act is to permit neighbourhoods to have their say in shaping the future of their area over the life of a Neighbourhood Plan.</i></p> <p><i>The NPPF guidelines assist shape future to meet those guidelines.</i></p> <p><i>Residents and stakeholders have provided their views. Both have been taken into account in writing policies for Lovelace.</i></p> <p><i>The Lovelace Neighbourhood Plan (LNP) has been revised following Regulation 14 comments from the Local Authority and statutory consultees.</i></p> <p><i>It has aimed to provide a balanced view of community vision and objectives in line with NPPF guidelines. It is intended to be positive and objective, conform to the general GBC LP policies, whilst addressing local requirements, and reflect the vision and objectives of the community for the life of the plan.</i></p> <p><i>The LNP supports the provision of new homes in sustainable locations to meet local and proportionate wider needs, on appropriate sustainable sites which reduce car usage and do not increase traffic on the local roads or carbon emissions in Ripley village.</i></p> <p><i>The Lovelace Profile provides history and current background to the rural character of the area which is important due to the major projects planned in the area over the next decade.</i></p> <p><i>Constraint and Challenges is a factual background to those projects over the next 10+ years and provide context to the policies. These projects are either in the pipeline or proposed. All information is in the public domain.</i></p> <p><i>This supplementary information provides context for the policies.</i></p> <p><i>The justifications include proportionate and robust evidence including NPPF guidelines and community Regulation 14 comments.</i></p> <p><i>The LNP is unable to object to a strategic site but has addressed the effects of both of the very large proposed sites on the community and character of the neighbourhood.</i></p> <p><i>The Guildford Borough Council (GBC) revised housing numbers after the ONS requirement for reductions in autumn 2018. The GBC housing figure includes a 37% buffer, significantly higher than the NPPF maximum 20%.</i></p>
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In early 2019 GBC decided to change from a retail-led future for the town centre to residential-led. The future of its department stores (Debenhams and House of Fraser) is uncertain. There are numerous surface car parks which provide opportunities for mixed use development. Numbers and locations of extra dwellings available in the town have still not been decided in the emerging GBC LP 2018, although that Plan is proposed for adoption on 25th April 2019. Once these numbers and locations are agreed, it may consider one of both of the two developments may not be required.

It is understandable why Ptarmigan Land and Savills (on behalf of the owners, Wisley Property Investments Ltd) have objected to policies in this NP. Savills are incorrect to state “Allocation A35” (now Policy A35) was declared sound at the end of the emerging GBC LP, as it was “the Plan” which was declared sound rather than any individual site.

The ‘Discussion Note by Guildford Borough Council Concerning the Wisley Airfield Decision’ clarifies “the appropriate mechanism for bringing forward development at Wisley is first via the plan-making process, and not ahead of it” (Point 2, 12.) and Wisley Airfield was not included within the plan (the Guildford Borough Council Local Plan) as a committed development, it was included only as an allocation, and should continue to remain as such.”

Neither the former Wisley Airfield or Garlicks Arch have planning permission, outline or full, as at the time of submission of the LNP. It does not sit well that Savills demand change or removal of LNP policies.

The PPG states “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.”

The community Regulation 14 responses (Consultation Statement, Appendix B – Online and Hard Copy Responses) clearly shows the two large developments on rural sites are considered inappropriate due to location and size. They community is unhappy that a large development is planned alongside the SPA/SSSI/SNCI. The community are vociferous in starting the disadvantages of this site and the effects of development at this location. They do not mention any benefits.

It is unrealistic to omit direct references to any site which will have a fundamentally life changing effect on the locality and character of the neighbourhood and would prevent the community giving their views.

	<p><i>This section has been amended and updated without any major changes.</i></p> <p><i>N.B. All policy numbers have been amended, e.g. from L.H1 to H1, etc.</i></p>
<p>Policy L.H1: Suitability of Development Sites</p> <p>Wolf Bond Planning</p>	<p>Lovelace Neighbourhood Plan - 2019-2034 (Consultation Draft) Land at Former Highlands Nurseries, Portsmouth Road, Ripley</p> <p>I write on behalf of my client, Woodcock Bros (Wimbledon) Ltd. in to respect of the consultation draft version of the Lovelace Neighbourhood Plan.</p> <p>My client controls land at the former Highlands Nurseries, Portsmouth Road, Ripley site extending to approximately 1ha. The attached Location Plan shows the extent of the site and context of the surrounding area. In addition, a satellite view of the site is provided below.</p> <p>The site comprises vacant land previously used for nursery purposes, located in the Green Belt. It is not presently in any private or publicly beneficial use. It forms a field contained on its western side by existing vegetation and on its northern and southern sides by residential properties fronting onto Portsmouth Road. It benefits from an existing vehicular access direct onto Portsmouth Road and lies between the settlements of Ripley and Send Marsh. The site is located entirely in Flood Zone 1 and unlike much of Ripley Parish is not located in the Conservation Area or in close proximity to any listed buildings. In addition, all the relevant services required for residential development are available from the site including drainage, gas and electricity connections.</p> <p>Consultation Draft Plan</p> <p>We are aware that at page 42 of the consultation draft, the Neighbourhood Plan group consider that future housing developments should be dealt with in a future review of the Neighbourhood Plan and that no further specific sites are considered necessary in Lovelace at this time. However, should the group consider changing this approach during the process, we wish to refer to the sustainable development opportunity that exists at our client's site.</p> <p>Proposals</p> <p>Following a conversation held with a member of the Neighbourhood Plan group (Mr Ayears) in late 2015 regarding my original letter my client instructed an architect to prepare an illustrative scheme showing how a residential development could come forward on the site. Before discussing the illustrative proposals further, I note that the scheme is flexible and my client is open to discussing its form in detail with the Neighbourhood Plan group as part of any potential site allocation.</p> <p>It is considered that up to 30 no. dwellings could come forward on the site in a verdant landscaped setting. The use of the existing access point enables the retention of the existing trees on the site's frontage adjacent to Portsmouth Road. Further landscaping can be introduced throughout the development and in particular on the site's boundaries.</p> <p>The site is well contained and is bound by existing residential development. I therefore write to offer the site as a potential allocation for a residential scheme within the emerging Neighbourhood Plan.</p> <p>Summary</p>

	<p>In summary, the proposed scheme represents an opportunity to provide a housing development on a self-contained site bound by existing residential development.</p> <p>We would welcome the opportunity to enter into dialogue with the steering group in order to further discuss a possible role for my client’s land within the Neighbourhood Plan.</p>
<p>Iceni obo Ptarmigan Land</p>	<p>Draft Policy LH1: Suitability of Development Sites</p> <p>3.11 The policy identifies that development within and adjacent to Ripley, Ockham and Wisely conservation areas should be sensitive to their surroundings, environment and to the character of the wider area. The policy goes on to list a detailed set of criteria which new development in Lovelace will be subject to where it meets the criteria.</p> <p>3.12 Whilst we support the broad intention of the policy, we encourage the Neighbourhood Plan Group to reconsider the wording of this policy at certain points. In particular, part 2) of the draft policy implies that development will be supported where it has “no adverse significant impact on the openness of the Green Belt, does not cause harm to the purposes of the Green Belt and respects the intrinsic character of the area”. This requirement would appear to be more onerous than national Green Belt policy set out at paragraphs 143-147 of the National Planning Policy Framework (NPPF), which would in certain circumstances allow Local Planning Authorities to permit application proposals that would result in an adverse impact on the openness of the Green Belt and/or cause harm to the purposes of the Green Belt. Similarly, the NPPF and the various policies of the draft Guildford Borough Local Plan would potentially permit schemes that would result in some harm to the historic environment, biodiversity or residential amenity, provided such impacts were of an acceptable magnitude when balanced against the benefits of the scheme. We therefore encourage the Neighbourhood Plan Group to review the wording of parts 2), 4), 12) and 13) of this policy to ensure it is compliant with national policy and in general conformity with the development plan, and allows for the possibility of a certain degree of harm within the overall planning balance when determining a planning application. This may be appropriately achieved by requiring that development proposals do not cause undue harm having regard to these various criteria.</p>
<p>Guildford Borough Council</p>	<p>Policy L.H1: Suitability of Development Sites</p> <p>6.1 Policy L.H1 uses the phrase “<i>will be supported</i>”. This phrase positively encourages “<i>new development in Lovelace</i>” that meets the criteria listed, but only where all 13 criteria are met. As a result, the policy is quite prescriptive. This policy should be streamlined by removing criteria that replicate national policy and other policies in the LNP in the first instance, and if possible by reducing the list to the key criteria.</p> <p><u>LH1 (2), (5) and (7)</u></p> <p>6.2 LH1 (2), (5) and (7) refer to national policy on Green Belt. National policy allows for new buildings to be built in the Green Belt in situations other than limited infilling and rural exception, as suggested in policy L.H1 (see paragraphs 145 and 146 of the NPPF 2018). Policy L.H1 does not support those developments, so does not seem to have had regard to national policy. It is suggested that LH1 (2), (5) and (7) could be either removed entirely (as they just restate national policy) or instead</p>

	<p>reduced to one clause along the lines of “<i>where it is consistent with national policy on Green Belt</i>”. This will also make the policy more concise.</p> <p>6.3 LH1 (2) – see above.</p> <p>6.4 LH1 (5) – see above. LH1 (5) should be removed as it requires all development to constitute limited infilling. There is no reason why a development that is otherwise compatible with Green Belt policy would need to constitute limited infilling – for example, change of use to provide a new cemetery or a local nature reserve outside the settlement, brownfield redevelopment outside of a settlement, or buildings to support agriculture in the countryside. This is not in general conformity with the Council’s existing strategic policy on Green Belt, as required by the basic conditions.</p> <p>6.5 LH1 (7) - the Council <u>objects</u> to the inclusion of LH1 (7). As currently written, the policy requires granting permission for rural exception developments to be contingent on the agreement of a parish council. This would fetter the Council’s discretion when exercising its statutory duty and as a result may be unlawful. Instead, the policy should set out the local connection test that the Council should apply when considering planning applications for rural exception housing. The Council’s view is that the plan would be clearer if this was set out in a separate rural exception policy or as an addition to housing policy L.H2.</p> <p><u>LH1 (8)</u></p> <p>6.6 LH1 (8) – this largely repeats policy L.BE1.</p> <p><u>LH1 (10)</u></p> <p>6.7 LH1 (10) withholds support for development that is greater than 500m from a public interchange. The majority of the land within Lovelace would be caught by this criterion.</p> <p>6.8 This is unreasonable for developments that are appropriately located outside of settlements (e.g. buildings that support agriculture, petrol stations, developments to support RHS Wisley etc.). Is this intended to apply to dwellings and/or offices only? If so, the policy should state that.</p> <p>6.9 Additionally, where developments propose to include a public transport interchange, it is not reasonable to require them to be within 500m of an existing interchange.</p> <p><u>LH1 (12)</u></p>
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	<p>6.10 It will be difficult for planning decision-makers to decide what constitutes “<i>irreversible harm</i>” to biodiversity so this requirement should be rewritten to improve clarity. LH1 (12) should be more closely aligned with national policy by requiring “<i>net gains</i>” in biodiversity. This would be consistent with L.EN2.</p> <p>6.11 However, to avoid repetition of requirements and make the plan more concise, biodiversity should be left to policy L.EN2.</p>
<p>Savills obo WPIL</p>	<p>Policy L.H1 Suitability of Development Sites sets out a number of criteria for new development. The LNP should make clear that this policy is not relevant to the strategic allocation at Former Wisley Airfield. In a wider context the criteria set out in LH.1 is not considered to be in line with the NPPF or the eGBLP in respect of infrastructure, ecology and mitigation and nature conservation. LNP should consider rewording this policy to ensure it is consistent with national and local policy and does not conflict with site specific policy. In its current form WPIL object to this policy.</p> <p>4.44. <u>Change required</u>: The plan is not strategic, and hence it must be made clear that policy L.H1 does not affect Allocation A35 (Former Wisley Airfield). This policy should be revised as follows (new text underlined): <i>“Policy L.H1: Suitability of Development Sites Development within and adjacent to the Ripley, Ockham, and Wisley conservation areas should be sensitive to their surroundings, environment and to the character of the wider area. <u>This policy applies to non-strategic development only</u>”</i></p>
<p>Changes to Plan</p> <p>Policy L.H1: Suitability of Development Sites</p>	<p><i>Policy L.H1 is renamed as Policy LNPH1.</i></p> <p><i>The community recognise the need for development to meet local need and a proportion of the borough need. Smaller developments alongside the settlement areas are considered most suitable and sustainable for this rural area.</i></p> <p><i>The community supports developers providing housing on small and medium sized sites easily accessible to the settlements.</i></p> <p><i>The community do not support development close to environmentally designated site.</i></p> <p><i>The community do not support the loss of large areas of countryside in the middle of the Green Belt.</i></p> <p><i>The community do not support major development in any location not well served by public transport.</i></p> <p><i>It is with regret that extra development locations are not considered due to the effects of the proposed large developments, discussed in other policies and justifications.</i></p> <p><i>Strategic policies are outside the remit of the LNP.</i></p> <p><i>The policy and justification have been amended.</i></p>
<p>Policy L.H2: Housing Mix</p>	<p>Draft Policy LH2 – Housing Mix</p> <p>3.13 This policy outlines a set of requirements for major development proposals, stating that such schemes need to provide for all identified needs of the local community with mix criteria for the affordable housing element as:</p>

<p>Iceni obo PHtarmigan Land</p>	<ul style="list-style-type: none"> • A minimum of 25% will be three-bedroom dwellings; • A minimum of 25% will be two-bedroom dwellings; • A maximum of 25% will be one-bedroom dwellings. <p>3.14 We welcome the principle of the housing mix policy, understanding the importance of delivering a wide variety of new homes. However, the need for different sizes of dwellings will clearly change over time, and we consider that it would therefore be more appropriate for the policy to require application proposals to have due regard to the identified local need at the time at which the application is submitted, thereby ensuring the proposed development responds to the actual needs of the community at that time, rather than relying on potentially outdated evidence. Furthermore, we consider that the policy should also take account of the nature of the site, and accordingly the desirability and ability of the application proposals to readily accommodate the range of unit types and sizes identified within the most recent assessment of need.</p> <p>3.15 The policy goes on to seek a minimum of 40% affordable housing for all developments over 5 or more dwellings. Whilst recognising that this percentage target complies with the Draft Local Plan Policy H2 Affordable Homes (2a) (albeit the 5 unit threshold has been increased to 10 units in the latest Local Plan Main Modifications consulted upon), it does not explicitly indicate that achieving this requirement will be subject to this level of affordable housing being viable to deliver. This was a point which the Inspector raised at the Guildford Local Plan Examination, which saw the inclusion of point 4a as a Modification (MM6), in order to ensure compliance with national policy. As such we would expect a similar clause to be included within the Neighbourhood Plan to ensure general conformity with the Local Plan and compliance with the NPPF.</p> <p>3.16 We therefore consider that the policy should be amended to outline that if developers satisfactorily demonstrate that providing the amount of affordable housing required by this policy would not be economically viable, the plan should allow a varying of the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and/or reducing the overall number of affordable homes.</p> <p>3.17 Furthermore, we note that the supporting text to the policy seems to indicate a preference for affordable rent above other tenures. However, the NPPF defines affordable housing as comprising a range of tenures, including starter homes, discounted market sale, and other affordable routes to home ownership (including shared ownership), alongside affordable housing for rent. Paragraph 64 of the NPPF expects 10% of homes within major developments to be available for affordable home ownership. Meanwhile Policy H4 of the draft Local Plan also refers to the provision of a range of different tenures for the affordable housing element of a development. As such, in order to ensure compliance with national planning policy and general conformity with the emerging Local Plan, we consider that it will be necessary for the supporting text to Policy LH2 to acknowledge that the definition of affordable housing includes a range of different tenures, and that applications should seek to provide a range of different types of affordable units, including units that will facilitate affordable home ownership.</p>
<p>Guildford Borough Council</p>	<p>Policy L.H2: Housing Mix</p>

	<p>7.1 Policy LH2 supports housing development where it meets the needs of the local community. The Council supports the principle of this positively worded policy.</p> <p><u>LH2 (1)</u></p> <p>7.2 Policy LH2 (1) recommends that “Major sites (10+ homes) provide housing for all needs with a mix of criteria for the affordable housing element as:</p> <ul style="list-style-type: none">a) A minimum of 25% will be three-bedroom dwellingsb) A minimum of 25% will be two-bedroom dwellingsc) A maximum of 25% will be one-bedroom dwellings <p>7.3 It is appropriate that neighbourhood plans should alter the housing mix to more accurately reflect local needs and circumstances, where this is supported by appropriate evidence. However, in the case of Lovelace, the Neighbourhood Area includes several LPMM site allocations that have been brought forward in order to meet the housing needs of the wider borough. Therefore, it is not appropriate that the Lovelace mix should apply to these sites.</p> <p>7.4 The West Surrey Strategic Housing Market Assessment (SHMA) (2015) and addendum (2017) sets out a borough wide need for 40% one bedroom, 30% two bedroom, 25% three bedroom and 5% four bedroom affordable homes (page 131). Should the Local Plan sites be delivered to the mix set out in L.H2, the result would be a significant under-supply of one and two bedroom homes and a significant over supply of 4+ bed homes, such that the Local Plan would not be able to meet the housing needs identified in the SHMA.</p> <p>7.5 The Guildford borough Submission Local Plan strategy and sites Policy H1 Homes for all, paragraph (1) states that new residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment. The policy paragraph has not been subject to any modifications as a result of the Local Plan examination process to date and is regarded as carrying considerable weight. Policy LH2 (1), as drafted, is therefore in conflict with Submission Local plan Policy H1.</p> <p>7.6 As a result of the above, the LNP is not aligned with the strategic needs of the wider local area, as required by the NPPF, and is not consistent with the strategy in the emerging Local Plan. The Council therefore <u>objects</u> to LH2 (1).</p> <p>7.7 Additionally, Policy LH2 (1) does not seem to reflect the Lovelace Housing Survey 2016, which demonstrated that the greatest need within the area is for small 2-3 bed roomed homes; with 43% of respondents wanting 2 bedrooms and 30% requiring 3 bedrooms (73% when both are combined). However, LH2 calls for 25% of homes to be 2 and a further 25% of homes to be 3 bed (50% when both are combined). It is not clear how the housing mix within the policy has been determined and the supporting text does not explain the reason for diverging from the evidence.</p>
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7.8 The Council's view therefore is that the LNP housing mix is not based on relevant, proportionate and robust evidence as required by the PPG and NPPF, and therefore is not in conformity with basic condition a.

LH2 (2)

7.9 Policy LH2 (2) requires that developments of 5 or more dwellings in Lovelace comprise a mix of market value and affordable housing, with a minimum of 40% to be affordable. The Guildford borough Submission Local Plan strategy and sites Policy H2 Affordable homes has been re-drafted following the advice of the Local Plan Inspector at the recent examination. The revised wording is currently being consulted on. Re-drafting policy LH2 (2) is recommended to ensure consistency with GBC Submission Local plan Policy H2 and national guidance as set out below.

7.10 The proposed additional modification to Policy H2 (clause (2)(a)) would require a financial contribution broadly equivalent to on-site provision of affordable housing for developments of between 6 and 10 dwellings inclusive (gross) or where dwellings have a combined gross internal floorspace of more than 1,000 square metres. This requirement was drafted to comply with national Planning Practice Guidance (PPG), which states that in designated rural areas affordable housing contributions should not be sought for developments of five units or less, rather than ten units or less as in other areas. As Ockham, Ripley and Wisley are designated rural areas, Policy LH2 (2) could justifiably require affordable housing contributions above the five unit threshold. However, to comply with PPG the minimum contributions threshold should be set at six, rather than five dwellings and contributions for schemes of between 6 and 10 dwellings must be in the form of financial payments rather than on-site provision of units. If LH2 (2) is amended as above then the parish council should be aware that it would duplicate the proposed amended wording of policy H2 (2)(a) and it may consider that including it is unnecessary. If the parish council opts to include an affordable housing policy then it may be helpful to indicate the form of contributions within the policy or reasoned justification or perhaps cross-refer to the PPG to avoid any misinterpretation of the policy.

7.11 The opening paragraph to Policy L.H2 refers principally to major developments (10+ dwellings). However, LH2 (2) and (3) do not refer to this category of development and appear as unrelated statements rather than as policy requirements. Should (1) and (2) be policy text (i.e. bold and unnumbered) rather than numbered criteria? Alternatively, it is recommended that the final sentence of the opening paragraph is redrafted along the following lines:

“Developments in Lovelace should provide the following mix of dwelling size:..”

7.12 The current wording of Policy LH2 (2) appears to be a statement rather than a policy requirement. It would be more effective if the word *should* was inserted before the word *comprise*.

LH2 (3)

	<p>7.13 The wording of policy LH2 (3) is unclear. It states that Rural Exception Sites may include a limited proportion of market housing, at GBC’s discretion, to provide homes for residents and workers with a local connection, i.e. family, work. Does this policy mean that the rural exception housing or the market housing will be for local residents and workers?</p> <p>7.14 The Guildford borough Submission Local Plan strategy and sites Policy H3 Rural exception homes has been re-drafted following the advice of the Local Plan Inspector at the recent examination. The revised wording has been consulted on and the results are being analysed. Re-drafting Policy LH2 (3) is recommended to make its intentions clear and to ensure consistency with GBC Submission Local plan Policy H3. To achieve this, it may simply be a matter of reordering the sentence structure so that it reads as follows:</p> <p><i>“3) Rural Exception Sites to provide homes for residents and workers with a local connection, i.e. family or work, may include a limited proportion of market housing, at Guildford Borough Council’s discretion.”</i></p> <p>However, it should be noted that this part of the policy repeats PPG and H3, so consideration should be given as to whether it needs to be included.</p>
<p>Savills obo WPIL</p>	<p>4.45 As set out above, the LNP should be clear that Policy L.H2 Housing Mix does not apply to the development at Former Wisley Airfield. This policy is not in line with the evidence submitted to support the eGBLP in terms of housing need and is not consistent with the policies of the eGBLP. The NP Group do not put forward any credible evidence to demonstrate that the local need to the NP area differs from the wider Borough significantly. In its current form WPIL object to this policy.</p> <p>4.46. <u>Change required</u>: The plan is not strategic, and hence it must be made clear that the Housing Mix policy does not affect Allocation A35 (Former Wisley Airfield). This policy should be revised as follows (new text underlined): “Policy L.H2: Housing Mix Development proposals that meet the identified needs of the local community will be supported, including starter homes, homes in shared ownership, affordable homes and market housing. For major developments of 10+ dwellings the following mix of dwelling size is recommended. <i><u>This policy applies to non-strategic developments only and the NP Group will work with GBC and Applicants to address local needs through strategic development.</u></i>”</p>
<p>Changes to Plan</p> <p>Policy L.H2: Housing Mix</p>	<p><i>Policy L.H2 is renamed as Policy LNPH2.</i></p> <p><i>The comments provided were helpful and the policy and justification have been amended.</i></p> <p><i>The housing mix considers local needs as the priority.</i></p> <p><i>Strategic sites are beyond the remit of Neighbourhood Plans.</i></p>
<p>Policy L.H3:</p>	<p>Draft Policy LH3: Housing Design and Density</p>

<p>Housing Design and Density</p> <p>Iceni obo Ptarmigan Land</p>	<p>3.18 Our client broadly supports the policy aspiration within LH3, recognising the important role that the Neighbourhood Plan can play in identifying the special qualities of the area. We have however identified certain aspects of the draft wording which we consider will need updating to ensure clarity and to comply with the ‘basic conditions’.</p> <p>3.19 Part 3) of the policy sets out that the design should use high quality materials which are in keeping with the surrounding properties and character of the area. Whilst we consider that it would be appropriate for development proposals to have due regard to the properties and character of the area, we are concerned that the policy as currently worded could require new development to be of the same design and materials to the surrounding area. In our view this would be contrary to paragraph 127 of the NPPF, which indicates that policies should not discourage appropriate innovation or change. In order to clarify this aspect, we consider that part 3) of the policy should be updated to read: <u>“the design uses high quality materials which take account of the surrounding properties and character of the area, whilst acknowledging the potential for innovation or change”</u>.</p> <p>3.20 Similarly, the references in parts 4) and 6) of the policy to the height of development proposals could be unduly restrictive in terms of requiring development to match existing patterns of development. Consequently we consider that is necessary to delete part 6) of the policy (given the apparent duplication between points 4) and 6)), and update part 4) to read: “the height of the proposed development is appropriate, having regard to the surrounding buildings and area.</p> <p>3.21 The wording of point 7 appears to be confused and we would suggest that this element should be re-written to refer to <i>‘an appropriate density having regard to the surrounding context’</i>.</p> <p>3.22 Furthermore, we note that parts 7) and 8) relate to densities. Notwithstanding the lack of clarity regarding whether the prescriptive density limits are net or gross figures, in our view a density threshold should not be imposed through the plan and appropriate densities should determined by an appropriate masterplanning exercise which considers the unique constraints of each site with regards to proposed densities, and having regard to the need to make effective use of land as advocated by chapter 11 of the NPPF. Initial masterplanning work for the Garlick’s Arch site has already been undertaken (included at Appendix 1), based on a range of initial technical assessments, demonstrating that the site has a capacity for approximately 550 dwellings, as set out in Ptarmigan’s Statement of Common Ground with GBC submitted as part of the Local Plan Examination.</p>
<p>Guildford Borough Council</p>	<p>Policy : L.H3 - Housing Design and Density</p> <p>8.1 Policy LH3 sets out a positive design policy to guide development. This approach is supported and it is agreed that this meets the basic conditions. The policy supports development where it meets 15 criteria plus further criteria in the opening sentence.</p> <p>8.2 The opening paragraph of the policy could be made clearer by redrafting as follows (or similar):</p>

“Development proposals will be supported providing that they are well designed, enhance the special qualities of each area and are sympathetic to local character and history in accordance with the following criteria.”

LH3 (1)

8.3 There is no reference to the recently adopted Residential Extensions and Alterations SPD (2018), which is the current GBC guidance for decision makers and developers alike.

8.4 It is not clear what the “SLGA Surrey Design 2002” document is. Decision makers would generally refer to the Council’s own guidance. If the reference is retained, it should not refer to a specific document from a specific year as this would mean the policy would become out of date if the document is updated or replaced. The policy could instead refer to *“the most recently adopted design guidance from Surrey County Council”* and the supporting text could list the current most recent guidance at time of writing. This would future proof the policy whilst retaining the link to specific guidance documents.

LH3 (2)

8.5 The Lovelace neighbourhood area has different conservation areas with different characters, as identified in the supporting text, which must be conserved and enhanced in a manner appropriate to their significance in line with Chapter 16 of the NPPF 2018. It is therefore unreasonable to restrict all *“conservation area proposals”* to compliance with the Ripley Conservation Area Appraisal, as this would have a significantly detrimental impact on the special historic qualities of the other conservation areas (and indeed other designated/non-designated heritage assets) where guidance for Ripley is irrelevant and harmful to the nature of these other assets.

8.6 This point could either be qualified as appropriate to Ripley only, or adjusted to allow other conservation area proposals the correct assessment against local and national policies.

8.7 The Council is currently producing new Conservation Area Appraisals for Conservation Areas that do not currently have them. The policy could instead refer to *“any relevant adopted Conservation Area Appraisals”* to ensure that these will be used in the future.

LH3 (5)

8.8 “Encroachment” in planning terms is the physical act of overstepping a boundary onto land not owned by the developer. Referring to it as a “sense” in a planning document may therefore be unclear. It is suggested that overbearing or overshadowing could be more appropriate wording in this instance. However, as LH3 (5) and (12) both relate to potential impacts on neighbouring amenity, it would be pragmatic to combine the two points in a brief sentence such as *“development should not adversely affect neighbouring amenity”* or similar.

LH3 (6)

8.9 LH3 (6) supports development where

“Buildings have a maximum height of three stories, including accommodation in the eaves, where this is in keeping with the streetscape and character of the settlement areas.”

The requirement will apply across the whole of the LNP area, including strategic sites. LH3 (6) could therefore have the effect of limiting the height of new buildings on strategic sites to three stories. This is at odds with the new NPPF, which is encouraging development to achieve higher densities. It is also not in general conformity with the emerging local plan as it could prevent the strategic sites from delivering the numbers of homes and employment units necessary to meet the identified needs in the local plan.

8.10 The provisions of LH3 (6) are highly prescriptive. The Council is concerned that the blanket restriction may be unenforceable in many situations, causing problems and delays during the development management process. For example, well-designed development proposals that include a basement storey, or loft-conversion ‘half-storey’, could quite reasonably respect the character of the area whilst accommodating more than three-storey dwellings. The strict application of LH3 (6) could provide for the unnecessary refusal of such proposals. The Council therefore suggests that the wording of LH3 (6) is removed, or amended to address building heights and the character of the area, ensuring that development does not materially harm the character of surrounding settlements where they exist.

8.11 Due to the potential impact on the Local Plan’s ability to meet identified needs, the Council must object to LH3 (6).

LH3 (7)

8.12 LH3 (7) states *“Developments are of a similar density to properties in the immediate surrounding and wider area the appearance of cramming”*. It appears that wording is missing, such as *‘to avoid the appearance of cramming’*.

LH3 (8)

8.13 LH3 (8) supports development where *“Developments have a maximum density of 40 per hectare within the settlement boundaries and a maximum of 30 dwellings per hectare outside the settlement areas to reflect accessibility”*. This is contrary to the NPPF at paragraph 123, which states that the use of minimum density standards should be considered, and a range of densities, including in areas outside city and town centres such as Lovelace. The NPPF and PPG generally support higher densities and the policy must have regard to this in order to meet the basic conditions. In particular, the supporting text should set out some consideration of whether minimum densities are needed in order to meet paragraph 123.

8.14 As with LH3 (6), the Council must object to LH3 (8) as the current wording could prevent Local Plan sites from meeting the development needs of the borough. LH3 (6) may be acceptable if it is stipulated to apply only to existing settlements (and not Local Plan sites), though it must still have regard to the density requirements in the NPPF and PPG.

	<p><u>LH3 (10)</u></p> <p>8.15 The two sentences of LH3 (10) could be split to form two policy points as they deal with different levels of development (major and non-major) and two issues (landscaping and links).</p> <p>8.16 LH3 (10) supports development where “<i>Appropriate landscaping and surfacing is provided following consultation with the highways authorities to support sustainable choices</i>”. Generally, the highways authority would be consulted on the design of roads or, if they are intended to be unadopted, on the connections to the local road network. SCC Highways are not consulted on/involved in most low-level applications relating to landscaping and surfacing unless it would directly affect a classified road. The Council would be able to encourage/require landscaping and surfacing choices as appropriate (i.e. where planning permission is required, but not where permitted development is involved).</p> <p><u>LH3 (14)</u></p> <p>8.17 The wording of the policy implies that <u>any</u> form of development must include bin store provision, which is not a reasonable requirement for small-scale developments like householder developments (e.g. applications for extensions, driveways, replacement windows in a conservation area etc.). The qualifier “<i>where appropriate</i>” should be added to the main point. If the requirement is only intended to apply to new dwellings, the policy should include that clarification.</p> <p>8.18 “Within the site” may be a better turn of phrase than “reasonable distance to the dwelling” for the assumed objective of this point.</p> <p><u>LH3 (15)</u></p> <p>8.19 “<i>Gated development</i>” as a phrase is very broad, and could be applied to a simple front boundary gate equally as to a new private estate with intercom access. The supporting text should define this term in order to bring clarity.</p> <p><u>Supporting text</u></p> <p>8.20 The supporting text states</p> <p><i>“The significant strategic site proposed for Ockham is likely to feature buildings quite unlike those within the present built areas (5-storey blocks of flats are shown in the outline planning application). If the site is developed, it is a requirement, as part of this policy, that all structures should be sensitive to and complement the specific design characteristics of Ockham to ensure this strategic development fits harmoniously into the surrounding landscape by virtue of design, height and density...”</i></p>
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	<p>It is agreed that the development as a whole should integrate sensitively into the surrounding landscape as far as possible. However, it is not reasonable to require “<i>all structures</i>” to do so as the new settlement will not be a hamlet and it is not reasonable to expect the entire settlement to replicate the look, feel and character of the surrounding loose-knit hamlets.</p> <p>8.21 Additionally, retaining the density of the surrounding hamlets across the whole site would result in the strategic site failing to meet the quantum of development need of the borough. Emerging Local Plan policy A35 requires the site to provide sensitive design and site boundaries that has significant regard to the transition from village to greenfield (criterion 22) and further requirements for high standards of urban design and architecture (criteria 22 and 23). The neighbourhood plan should adopt an approach that supports this strategic policy, encouraging integration without unduly restricting development opportunities on the site. There is an opportunity for the LNP to provide detail that complements and fleshes out the broad approach of policy A35.</p>
Savills obo WPIL	<p>4.47 Policy L.H3 Housing Design must include reference to being read alongside the eGLP and any other relevant planning guidance produced by GBC particularly in reference to the proposed development at Former Wisley Airfield. This is to ensure that a design policy is not overly restrictive and does not prevent the timely delivery of developments. In its current form WPIL object to this policy.</p> <p>4.48. Change required: The plan is not strategic, and hence it must be made clear that the Housing Mix policy does not affect Allocation A35 (Former Wisley Airfield). This policy should be revised as follows (new text underlined): <i>“Policy: L.H3 – Housing Design and Density Developments which are well designed, enhance the special qualities of each area and are sympathetic to local character and history, will be supported if [...] <u>This policy applies to non-strategic development only and the NP Group will work with GBC and Applicants to secure an appropriate design for strategic developments.</u>”</i></p>
<p>Environment (general)</p> <p>Surrey Wildlife Trust</p>	<p>Page 51. <i>“Local level protection consists of the areas of biodiversity and natural habitats areas designated by the Surrey Local Sites Partnership Surrey County Council and Guildford Borough Council.”</i> Here it may be useful to view new content concerning the process for adoption of SNCIs into local planning policy on the Surrey Nature Partnership website, here. <i>Sites of Nature Conservation Importance Interest (SNCIs) - Ripley Green, Elm Corner Woods, Hunts Copse, Wisley Field (including the area around the former Wisley airfield)</i> <i>Local Nature Reserves (LNR) - Ockham and Wisley Commons, Ripley Nature Reserve.</i> It may be intended to legally declare the Ripley Nature Reserve as a Local Nature Reserve, but this would have to be approved by Natural England for formal declaration under the National Parks and Access to the Countryside Act 1949 (Section 21).</p> <p><i>“Landscape-scale conservation - part of a Dept of Environment, Food and Rural Affairs national strategy, Biodiversity 2020, to formally select areas as significant sites for nature conservation”. We are not sure what this is referring to. Re-drafting is advisable, or it may be better to delete entirely.</i></p> <p><i>“Biodiversity Opportunity Areas (BOAs) - areas identified for the targeted maintenance, restoration and creation of priority habitats. Parts of Lovelace are included within the following BOAs; TBH06 Wisley, Ockham & Walton Heaths, R04 River Wey (& tributaries), TBL02 Clandon to Bookham Parkland. These do not have legal protection, but are expressions of government</i></p>

	<p><i>and local policy initiatives to conserve and enhance priority habitats and biodiversity on a landscape scale in alignment with the aspirations of the current national Biodiversity Strategy Biodiversity 2020: A strategy for England’s wildlife and ecosystem services.”</i></p> <p>A single reference would be sufficient here; <i>Biodiversity Opportunity Areas: the basis for realising Surrey’s ecological network</i> (Surrey Nature Partnership, 2015).</p>
<p>Guildford Borough Council</p>	<p>Environment policies, introduction</p> <p>9.1 The text refers to SPAs (Special Protection Area). This is not quite correct as there is only one SPA that falls partially within Guildford borough, which is the Thames Basin Heaths SPA (TBH SPA). The TBH SPA has many sites covering large parts of Surrey, Hampshire and Berkshire. Therefore, where the text is referring to the TBH SPA it should refer to either “<i>the SPA</i>” or “<i>SPA sites</i>”, but not “<i>SPAs</i>”. Not all SPAs across the UK have 400m buffer zones as stated in the text, but all TBH SPA sites have 400m buffer zones.</p> <p>9.2 Where the text refers to SANGs, it fundamentally misunderstands their purpose. See below</p> <p>9.3 The text in page 51 states: “...<i>planning permission should be refused for development resulting in the loss of or deterioration of irreplaceable habitats, including ancient woodland ...unless development clearly outweigh the loss (NPPF, Para 118). In such cases, mitigation is through a SANG...</i>”. SANGs are exclusively designed to protect the SPA and can only avoid harm to the SPA from increased recreational pressure, and not harm from other sources. This text must be redrafted as it is factually incorrect.</p>
<p>Savills obo WPIL</p>	<p>Objection, page 51</p> <p>4.50. The LNP should be updated to reflect the accurate position on SNCI at Former Wisley Airfield as outlined in separate representations. There is agreement between the Wildlife Trust, GBC and the landowner on the SNCI areas and a relevant statement of common ground between GBC and WPIL. In addition, the LNP should recognise that local sites and ancient woodland are protected by the NPPF, not just the eGBLP. Updated references to the NPPF Revision are required.</p> <p>4.51. <u>Change required</u>: The LNP should be updated to reflect the NPPF Revision and evidence base including the most up to date position on the SNCI as agreed by WPIL, GBC and Surrey Wildlife Trust. <i>[The suggested text for the inserted / replacement paragraphs are best drafted post the proposed eGBLP Examination Hearing in January].</i></p>
<p>Changes to Plan</p> <p>Policy L.H3: Housing Design and Density</p>	<p><i>Policy L.H3 is renamed as Policy LNPH3.</i></p> <p><i>The comments have been considered and the policy and justification amended.</i></p>

<p>Policy L.EN1: Local Green Spaces and Local Views</p> <p>G & C Walton</p>	<p>The space you refer to as Ockham CC is actually named ‘Hautboy Meadows.’ You have mistakenly included the car park and land next door owned by The Hautboy residents that is not part of The Cricket Club (Hautboy Meadows) If you remove these you have our support.</p>
<p>Ripley Village Hall CIO</p>	<p>Thank you for your letter dated 29th August 2018 regarding the Lovelace Neighbourhood Plan, which we discussed at the Ripley Village Hall Trustees meeting held last week.</p> <p>Suzie Powell-Cullingford has also sought further verbal clarification from Annie Cross, specifically to understand the intention and limitations for the designation of Ripley Village Hall as a potential Local Green Space within the LNP. Suzie and Annie both agreed that as volunteer groups working for the benefit of the village, there is an understanding by both parties how this designation came about but that it may not actually be accurate or helpful given the planning application for the new Ripley Village Hall that is currently under assessment by GBC.</p> <p>The Trustees can understand that some protection offered by the LNP may be helpful in the future but in the current format, the boundary lines will entirely hamper the position of the new halls and potentially preclude any future re-siting of the Send and Ripley History Society Building. Furthermore, the Trustees would not wish to prevent any future development of the large green field area to the back left of the current hall, as we may potentially have long term plans to create an all-weather recreational facility. We would like to reassure you however that the current committee of Trustees have no desire to utilise this land for housing, as it expressly against the wishes of the majority of the village.</p> <p>We would welcome a meeting during the Regulation 14 consultation period so that we can mutually agree the best solution to allow the new village hall design planning application to proceed unhindered and with the full support of the LNPG.</p>
<p>Ockham Park</p>	<p>Ripley Bowling Club, Neighbourhood Plan</p> <p>I have let the land to Ripley Bowling Club for 50 years and I consider this to be enough security as it is designated as a bowling club. I think it would be wrong of me to confine my heirs to something with which they may not agree so I would prefer to leave it as it is at present. With kind regards for your help with the airfield and hope very much that will be included as it is more important.</p>
<p>Ripley Court School</p>	<p>Thank you for the information. I have now received the draft of the Lovelace plan, and it is clear what a huge body of work this comprises. My congratulations to you all on this. It is so important that Ripley remains an attractive village. I shall be responding positively to this, in full, shortly.</p> <p>However, we (i.e. the Governors and I) do have some concern about on the implication of the entire school being designated a Green Space.</p>

	<p>Ripley Court has a long history (I speak of my tenure at least) of helping the community and making its assets and facilities available. The primary school, for example, would use our fields occasionally, and out pool regularly, and we did not charge for this. Many community groups use the pool to this day, as well as other facilities, and you may recall that the school was home to the Bowling Club until they found a new home next door. The village teenagers ran their football team on Court Meadow for some years and their youth club at the school, and any similar group would be welcomed back. Ripley Rocks is a village feature and this would not change, whether it happened on Court Meadow or on the other side of the road, where, in fact, there are many facilities which might help and improve the event. Court Meadow is used regularly by the scouts and for other ad-hoc events, and even for parking now for the Ripley Event and Bonfire. No development at the school would threaten this and indeed, we always encourage new ideas for wider use of the facilities, as those who have ever asked me have found out.</p> <p>We are already inside the Green Belt and also in a Conservation Zone so Green Space designation offers little further protection. I can assure you that we have no plans to change the use of our sports fields from use as sports fields. That space is one of the biggest selling points of the school. Nor are we likely to achieve any change in their designation even if we so desired, which we do not.</p> <p>We feel the Green Space designation might in fact hamper our desire to use our facilities to the fullest and limit our flexibility to update these amenities in the future. Since the village, with our permission, already makes use of our facilities and will continue to do so, we don't think this particular designation would be helpful to the local community either.</p>
<p>Surrey Wildlife Trust</p>	<p>Page 52. Policy LEN1 - Local Green Spaces and Local Views. It would not be inappropriate to include your SNCI as Local Green Spaces; in fact we would recommend this provided they satisfy all other criteria for LGS. This would certainly be the case for Ripley Green which is exactly the kind of site designed to be LGS, but not the three 'Three Farms Meadows' SNCIs as they are not formally accessible by the public.</p>
<p>Guildford Borough Council</p>	<p>Policy L.EN 1: Local Green Spaces and Local Views 11</p> <p>10.1 The policy states "<i>Policies for managing development within the Local Green Spaces listed in Appendix 4.2 should be consistent with policy for Green Belts.</i>". This sentence does not appear to be directed at planning applications, but appears to be guidance aimed at plan makers. It could instead state something along the lines of "<i>Proposals for development within the Local Green Spaces listed in Appendix 4.2 will be treated in a manner consistent with Green Belt policy</i>". However, this sentence is not necessary as it restates national policy. The policy could instead simply designate spaces as Local Green Space and leave the protection of those spaces to national policy, or it could introduce criteria setting out when development will and won't be acceptable as other neighbourhood plans have done.</p> <p><u>Supporting text</u></p> <p>10.2 The supporting text lists Three Farm Meadows (the Former Wisley Airfield) as a Local Green Space. However, this is not included in Appendix 4.2 or the map of Local Green Spaces (the version in the regulation 14 plan errata), so its inclusion</p>

	<p>appears to be erroneous and should be removed for clarity. The council <u>objects</u> to any proposal to designate the site as Local Green Space because doing so would undermine the spatial strategy in the emerging local plan and would prevent the Local Plan from meeting the development needs of the borough.</p> <p><u>Appendix 4.3</u></p> <p>10.3 Appendix 4.3 sets out the protected views and Local Green Spaces. The evidence supporting the views could be improved by setting out what makes each view special (rather than just describing the view), and by improving the photographs. Several of the photographs and descriptions do not suggest a special view deserving of protection.</p> <p>10.4 Views 23 and 24 are views across the former Wisley Airfield, including a view down the runway (view 24). Development of the site in accordance with strategic policy A35 of the emerging Local Plan will undoubtedly have impacts on the views across the site and therefore policy L.EN1 could negatively impact site delivery. The Council must therefore <u>object</u> to views 23 and 24 for the reasons set out in 10.2.</p>
<p>Savills obo WPIL</p>	<p>Objection, L.EN 1 Local Greenspaces and Local Views</p> <p>4.53. WPIL has no specific comment to make on the Policy. However, the supporting text refers to Former Wisley Airfield. It is not clear why this reference is relevant to the policy, as the policy is clearly related to development within existing settlement areas.</p> <p>4.54. Change required: The plan is not strategic, and hence it must be made clear that the Local Green Spaces and Local Views does not affect Allocation A35 (Former Wisley Airfield). This policy should be revised as follows (new text underlined): <i>"Policy L.EN 1: Local Green Spaces and Local Views</i> <i>Sustainable development will be supported within the settlement areas where it can have a positive environmental impact.</i> <i>Policies for managing development within the Local Green Spaces listed in Appendix 4.2 should be consistent with policy for Green Belts. Development which does not have a significant adverse effect on the local views shown in Appendix 4.3 will be supported. <u>This policy applies to non-strategic development only.</u>"</i></p>
<p>Changes to Plan</p> <p>Policy L.EN1: Local Green Spaces and Local Views</p>	<p>Policy L.EN1 renamed as Policy LNPEN1.</p> <p>The policy and justifications have been amended.</p> <p>Some proposed Local Green Spaces in Ripley have been removed following representations which were discussed, and agreed, by Ripley Parish Council.</p>
<p>Policy L.EN2: Biodiversity and Natural Habitats</p>	<p>Thank you very much for consulting the Woodland Trust on your neighbourhood plan for Lovelace, we very much appreciate the opportunity. Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.</p>

<p>Woodland Trust</p>	<p><u>Vision and Objectives</u></p> <p>The Woodland Trust is pleased to see that your Neighbourhood Plan identifies the important role that trees play, and that opportunities should be taken to increase tree cover in appropriate locations in Lovelace.</p> <p>Trees are some of the most important features of your area for local people, and already this is being acknowledged with the Guilford Borough Proposed Submission Local Plan (2017), which acknowledges the need to retain trees, and Policy D4 (Character and Design of New Development), which seeks to ensure that all development must be laid out to make the best use of natural features, such as trees. Therefore, this should also be taken into account with an objective for the environment in Neighbourhood Plan for Lovelace, and should be amended to include the following:</p> <p>Protection of Local Green Spaces of community value, <i>such as any ancient and veteran trees.</i></p> <p><u>Protecting Local Green Spaces, Biodiversity and Natural Habitats</u></p> <p>We are pleased to see that Policy L.EN2 (Biodiversity and Natural Habitats) acknowledges the vital contribution of the countryside in Lovelace, and how your plan can assist with safeguarding this from encroachment and protect and enhance mature trees and hedgerows. But this should also be recognised with Policy L.EN 1 (Local Green Spaces and Local Views) and the fact that development should not lead to loss or degradation of trees in your parish. Increasing the amount of trees in Lovelace will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</p> <p>Information can be found here: http://www.magic.gov.uk/MagicMap.asp and http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/</p> <p>Ancient woodland would benefit from strengthened protection building on the National Planning Policy Framework (NPPF). On 24th July the Ministry of Housing, Communities and Local Government published the revised NPPF which states:</p> <p>development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists</p> <p>The Woodland Trust believe this must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland and trees. Therefore, we would recommend that Policy L.EN 1 acknowledges tree protection and provision should include the following:</p>
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	<p><i>'There should be no harm to or loss of irreplaceable habitats such as ancient trees and veteran trees'</i></p> <p>The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>We would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Lovelace. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them as well.</p>
Iceni obo Ptarmigan Land	<p>Draft Policy L.EN2: Biodiversity and Natural Habitats</p> <p>3.23 We note that part 1) of the policy requires development to demonstrate that there will be no loss of, or harm caused to the adjoining area of natural habitat. However, this would appear to be more restrictive than national policy; paragraph 175 of the NPPF allows scope for some harm to biodiversity, provided appropriate mitigation and/or justification is provided. Consequently we consider that the policy wording should be updated to read: "the developer can demonstrate there be no undue loss of, or harm caused..."</p> <p>3.24 Meanwhile part 3) of the policy requires proposals to include SANG "in the planning application". It should be clarified that that a relevant contribution can be made to communal/ Council SANG off site if deemed appropriate, in accordance with Policy P5 of the draft Local Plan.</p> <p>3.25 Furthermore, part 5) of the policy implies that <i>all</i> development proposals will be required to be supported by an Environmental Impact Assessment (EIA), and this is repeated in the supporting text to the policy on the following page. We object to this implication, as it would be contrary to the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, which set out relevant thresholds and a clear screening process to be undertaken to establish whether development proposals would comprise EIA Development. The requirement for <i>all</i> developments to be supported by an EIA would clearly be unjustified having regard to the relevant legislation. As such, we consider that the text will need to be updated to indicate that EIAs will only be sought where necessary, in accordance with the relevant legislation and guidance.</p>

	<p>3.26 Within the supporting text to the policy, we also object to the reference to development at Garlick’s Arch “risks coalescing with Guildford, as the landscape gap is set to be further eroded”. The extensive technical information submitted with Ptarmigan’s representations on the various stages of the Guildford Borough Local Plan indicate that it is appropriate in landscape terms to develop the land at Garlick’s Arch for residential development without any undue harm resulting, and Guildford Borough Council has demonstrated in its own evidence base in support of the Local Plan that development at this location would not result in undue coalescence of any other unduly adverse landscape impact. As such, we consider that this reference is inappropriate and inaccurate, and should be deleted.</p>
<p>Surrey Wildlife Trust</p>	<p>Page 55. Policy LEN2 – Biodiversity and Natural Habitats. We welcome the inclusion of this policy. Suggested amendments include; <i>“2). Developments avoid impacts on protected or other priority species and, where relevant, provide a survey to determine the presence of protected and priority species... Where appropriate feasible, all developments will be required to: 5) Provide an Environmental Impact Assessment and/or Habitats Regulations Assessment, and use the Department for Environment, Food & Rural Affairs’ Biodiversity Net Gain Metric and/or the Environment Bank Biodiversity Impact Calculator.”</i></p> <p>Page 56. Reasoned Justification. Much of the description of the biodiversity interest of Lovelace has been justifiably researched from the relevant SSSI citations for Ockham & Wisley Commons and Papercourt. Unfortunately, some of this information is now out-of-date and certain species have since been lost in reflection of ongoing national declines - which actually enhances the case for the biodiversity policy you espouse. For example, Snipe, Redshank and Sand martin no longer breed at Papercourt. However suitable substitutes might include Sedge warbler, Meadow pipit and Reed bunting. Shoveler has one ‘1’.</p> <p><i>“The government’s biodiversity strategy for England, Biodiversity 202038, sets out the strategic direction for biodiversity policy and Surrey Wildlife Trust’s vision for Living Landscapes, outlined in ‘A Living Landscape for Surrey’39 and ‘SWT Living Landscape Strategy40’ translate this national policy into an effective strategy for implementation in Surrey.”</i></p> <p>Reference to Defra’s Biodiversity Offsetting Metric should be updated as the Defra Biodiversity Net Gain Metric.</p> <p>Page 57. In the final paragraph the Trust is in fact misquoted; <i>‘enricher enabler’</i>, however the relationship of this to Sir John Lawton’s recommendations in ‘Making Space for Nature’ does require some further articulation.</p> <p>I hope these comments are useful, and we look forward to further involvement in the development of your Neighbourhood Plan.</p>
<p>Guildford Borough Council</p>	<p>Policy L.EN2: Biodiversity and Natural Habitats</p> <p>11.1 The opening sentence of the policy states <i>“All development proposals must encourage local biodiversity and demonstrate that developments will deliver net gains to wildlife, biodiversity and the landscape, as required by the NPPF.”</i> The NPPF calls for net gains for biodiversity (and across the economic, social and environmental dimension). However, it</p>

	<p>doesn't call for net gains in landscape, and it is not clear what would be required to satisfy this requirement (i.e. what is a net gain in landscape?). Otherwise the Council supports the opening sentence.</p> <p>11.2 The policy permits development adjacent to the SPA where the criteria are met. This is not consistent with policy NRM6 of the South East Plan, the Council's Thames Basin Heaths Special Protection Area Avoidance Strategy and emerging policy P5 of the Local Plan, which all prohibit net new residential development within 400m of the SPA. This may also be unlawful, as damaging the SPA constitutes an offence, and it is established that the impacts of new housebuilding within 400m of the SPA cannot be avoided through mitigation measures. The council must therefore <u>object</u> to this policy and insist that it is rewritten to be consistent with the established approach to protecting the SPA.</p> <p>11.3 The protection of nationally and internationally designated sites is a strategic matter, so it is suggested that the policy should instead reference the protections for these sites provided by higher level plans and restrict neighbourhood plan policy to dealing with the protection of local sites. The policy should state that development proposals must be in accordance with the Council's TBH SPA Strategy; this will ensure that the LNP remains in conformity with adopted strategic SPA approach.</p> <p><u>LEN2 (3)</u></p> <p>11.4 As set out in paragraph 9.3, LEN2 (3) fundamentally misunderstands the role of SANGs. The policy states: <i>"Development proposals adjoining the SPA, SSSIs or LNRs, or on/adjoining SNClS, will not be permitted unless:... (3) The provision of a SANG is included in the planning application"</i>.</p> <p>11.5 SANGs are required by policy NRM6 of the South East Plan, the Council's Thames Basin Heaths SPA Avoidance Strategy 2017 SPD and policy P5 of the emerging Local Plan. SANGs are provided to avoid the impacts on the SPA from increased recreational pressure brought by new homes. SANGs are provided to divert the additional recreational pressure and do not function as compensation for habitat loss. SANGs cannot be required for developments that may have impacts on designated sites other than the SPA and cannot be required for any non-residential developments because the only impact they mitigate is the impact of increased recreational pressure brought by housing.</p> <p>11.6 Where a residential development WOULD have an impact on the SPA, it is unreasonable to require SANGs to be provided within the planning application in every case. Many developments are too small to provide their own SANG, so the Council and other providers provide strategic SANGs that those developments can use for mitigation. A requirement for all developments to provide their own SANG would result in the vast majority of residential developments becoming unviable.</p> <p>11.7 Policy NRM6 of the South East Plan and policy P5 of the emerging Local Plan are strategic policies and the LNP must be in general conformity with NRM6 and give due regard to P5 in order to meet the basic conditions.</p> <p>11.8 In view of the above, the Council <u>objects</u> to LEN2 (3).</p> <p><u>LEN2 (5)</u></p>
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	<p>11.9 LEN2 (5) requires all development where feasible to “<i>Provide an Environmental Impact Assessment</i>”. This requirement is not consistent with the regulations set at the national level.</p> <p>11.10 The requirement and the process for Environmental Impact Assessment (EIA) in the context of town and country planning in England is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the ‘2017 Regulations’). It will only apply to a small proportion of projects considered within the town and country planning regime. Local planning authorities have a well-established general responsibility to consider the environmental implications of developments that are subject to planning control. The 2017 Regulations integrate Environmental Impact Assessment procedures into this framework and should only apply to those projects that are likely to have significant effects on the environment. These include all the developments listed in Schedule 1 of the 2017 Regulations, and only those developments in Schedule 2 that are likely to have a significant impact on the environment by virtue of their nature, size or location. The types of development that tend to require EIA are large projects such as nuclear power stations, major road schemes and wastewater treatment plants. The EIA regime is set at a national level. It is therefore unreasonable to set a policy for EIA through a neighbourhood plan, and asking for EIA to be carried out is unduly onerous for most developments and is not consistent with the 2017 Regulations.</p> <p>11.11 Basic condition g. requires prescribed conditions to be met before the neighbourhood plan can be made (adopted). One of the prescribed conditions is that the neighbourhood plan must not contain EIA development. This makes it clear that neighbourhood plans should not address EIA development.</p> <p>11.12 In view of the above, the Council <u>objects</u> to LEN2 (5).</p>
Savills obo WPIL	<p>Objection, L.EN 2 Biodiversity and Natural Habitats</p> <p>4.55. The policy is not considered to be drafted in an appropriate manner that reflects national policy and established ecological principles. The issues identified with this policy wording include:</p> <ul style="list-style-type: none"> ▪ The policy as a whole should make clear that a mitigation hierarchy be applied in designing development proposals; ▪ Point 2 - The wording must include wording in respect of any harm being outweighed by the need for development, the ability of a development to avoid, mitigate or compensate impacts on protected species and habitats and the need where required for agreement to be sort with Natural England. ▪ Point 3 - makes no reference to relevant requirements of the Thames Basin Heaths SPA Delivery Framework or relevant GBC Supplementary Planning Documents. ▪ Point 5 - outlines the need for some development to prepare an EIA however this requirement is dictated by the EIA Regulations and GBC undertake the EIA Screening assessments. This does not need to be repeated within neighbourhood level policy. ▪ Point 5 - refers to the DEFRA Offsetting Metric which is currently being updated and there are other widely used metrics available. The policy should therefore refer to a “suitable offsetting metric” and acknowledge that any metric

	<p>should only be used as a tool to inform the wider ecological impact assessment process, undertaken in accordance with the CIEEM EclA Guidelines (2018);</p> <ul style="list-style-type: none"> ▪ Point 6 & 7 refer to the retention of certain habitat features, however there is would be more accurate to require the “<i>retention and enhancement of features of significant ecological importance, where possible</i>”. ▪ Point 8 – would be more accurate to state “<i>development design should apply the mitigation hierarchy, with habitat translocation proposed as a last resort</i>”. <p>4.56. WPIL questions whether this policy adds anything locally distinctive to differentiate it from the eGBLP and therefore why it is required to be included in the LNP. In addition, some of the supporting text from page 56 is inaccurate including:</p> <ul style="list-style-type: none"> ▪ In Section 2.2.2 and at page 56 the LNP sets out that “<i>most roads are unlit which encourages nocturnal wildlife</i>“. This should be reworded and currently this implies that wildlife are attracted to the area because the roads are unlit. This is not an accurate implication as the habitat type is the major factor influencing the distribution of wildlife. <p><u>Change required:</u> This paragraph should be reworded to read (new text underlined): “<i>most roads are unlit which <u>does not deter</u> nocturnal wildlife</i>”;</p> <ul style="list-style-type: none"> ▪ The text on page 56 refers to wild deer which are not considered to be features of notable ecological importance; ▪ The text on page 56 refers to the Biodiversity 2020 and not the 25-year Environment Plan which post dates this; and ▪ The text on page 57 refers to Natural England and Forestry Commission guidance which has been superseded. <p>4.57. Change required: The plan is not strategic, and hence it must be made clear that the Biodiversity and Natural Habitats policy does not affect Allocation A35 (Former Wisley Airfield). Importantly, the Policy should either be significantly reworded or deleted in order to be accurate and to reflect appropriate national policy and legislation. The matter of biodiversity and natural habitats conservation and enhancement is covered by the eGBLP policy framework. WPIL therefore considers that the policy should be deleted.</p>
<p>Changes to Plan</p> <p>Policy L.EN2: Biodiversity and Natural Habitats</p>	<p><i>Policy L.EN2 renamed as Policy LNPEN2.</i></p> <p><i>The comments were considered and policies and justification amended.</i></p>
<p>Policy L.EN3: Flooding</p> <p>Guildford Borough Council</p>	<p>Policy L.EN3: Flooding</p> <p><u>LEN3 (1)</u></p>

	<p>12.1 LEN3 (1) requires developers of “<i>new buildings, extensions and areas of hard surfaces</i>” to show that the development “<i>Will not increase the vulnerability of the site, or wider catchment area, to flooding from surface water run-off</i>”. This effectively requires a Flood Risk Assessment (FRA).</p> <p>12.2 The PPG (Flood risk assessment for planning applications) sets out when a flood risk assessment is necessary, and makes it clear that assessments are not needed for developments in areas outside flood zones 2 and 3 where the development is less than 1 ha, unless it could be affected by sources of flooding other than rivers and sea. The policy as written therefore contradicts the PPG and needs to be amended.</p> <p>12.3 Requiring a flood risk assessment would be an unduly onerous requirement for smaller developments, such as domestic extensions and new driveways.</p> <p><u>LEN3 (2)</u></p> <p>12.4 It is unclear whether LEN3 (2) requires developers to provide mitigation measures that would reduce surface water flooding that may arise from other developments, or just from their own development proposals. The wording should be amended to clarify that it is the latter, as if left as it is then it could be seen to conflict with NPPF paragraph 16 (b) by imposing an unreasonable development cost that could threaten the viability and deliverability of some schemes.</p> <p>12.5 The Guildford Surface Water Management Plan, which covers the Lovelace Neighbourhood Area, proposes opportunities for measures to improve highway drainage, to be funded by Surrey County Council as the highway authority with potential FDGiA (Flood Defence Grant in Aid). However, it does not set standards for developers, as LEN3 (2) implies. The current wording is misleading and should be amended.</p> <p><u>LEN3 (4)</u></p> <p>12.6 The wording of the second paragraph of policy L.EN3 should be amended to clarify that it applies to development proposals in areas affected by surface water flood risk only, not to all developments, as the requirement to incorporate SuDS (LEN3 (4)) would impose an unnecessary burden on developers proposing schemes that fall outside of these areas.</p>
Savills obo WPIL	<p>Objection, L.EN 3 Flooding</p> <p>4.58. WPIL has no specific comment to make on the Policy. WPIL questions whether this policy adds anything locally distinctive to differentiate it from the eGBLP. The eGBLP already includes a policy on Flood Risk.</p> <p>4.59. <u>Change required</u>: The plan is not strategic, and hence it must be made clear that the Flooding policy does not affect Allocation A35 (Former Wisley Airfield). This policy should be revised as follows (new text underlined): “Policy L.EN3: Flooding</p>

	All development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk. <i><u>This policy applies to non-strategic development only</u></i>
Changes to Plan	<i>Policy L.EN3 renamed as Policy LNPEN3.</i>
Policy L.EN3: Flooding	<i>The comments were considered and the policy and justification amended.</i>
Policy L.EN4: Light Pollution	Policy L.EN4: Light Pollution
Guildford Borough Council	13.1 Dark skies policies have been used in neighbourhood plans previously, and have been successful at examination. However, it should be noted that the installation of lighting, particularly domestic lighting, is usually permitted development and is not subject to planning permission from the Local Authority. As a result, the policy may have a limited impact. 13.2 Street lighting is a county matter. LEN4 (3) and (4) may work better as an aspirational policy.
Savills obo WPIL	Objection, L.EN 4 Light Pollution 4.61. WPIL has no specific comment to make on the Policy. WPIL questions whether this policy adds anything locally distinctive to differentiate it from the eGBLP or is based on any evidence base. 4.62. Change required: The policy appears superfluous. WPIL therefore considers that the policy should be deleted.
Changes to Plan	<i>Policy L.EN4 renamed as Policy LNPEN4.</i>
Policy L.EN4: Light Pollution	<i>The comments were considered and the policy and justification amended.</i> <i>Artificial lighting has an effect on the countryside and biodiversity, so this must be taken into consideration.</i>
Policy L.EN5: Air Quality and Traffic Pollution	Draft Policy L.EN5: Air Quality and Traffic-Pollution
Iceni obo Ptarmigan Land	3.27 With regard to the requirement at part 2) of the policy to provide an Ecological Assessment, we note that this would not appear to be relevant to air quality, as the assessment would focus solely on ecological considerations. It is therefore unclear how this part of the policy would relate to air quality and traffic pollution measures. 3.28 With regards to part 3) which sets out the need for major applications to provide a Construction and Environmental Plan (CEMP) we note that the Parish Council would likely be a consultee on an application that included the submission of a CEMP, but would not be the determining authority on such matters.

	<p>3.29 Notwithstanding that part 5) of the draft policy would appear to be incomplete in its current wording, the NPPG makes clear that it is important to ensure that conditions are tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary control. Any such restrictions on HGV movements should therefore be applied on a case by case basis, having regard to the anticipated impacts of such impacts and the necessity of any such condition, and removed from the Neighbourhood Plan policy wording.</p> <p>3.30 The second paragraph on page 65 within the supporting text to the policy suggests that the combined effects of the Garlick’s Arch and Burnt Common sites could result in local traffic issues. However, as discussed above, the assessment work undertaken to date by our client’s consultant team indicates that the development at Garlick’s Arch would not have an unduly detrimental impact on the road network and a range of measures are proposed to enhance the accessibility and sustainability of the site (as included within the latest draft text for Policy A43 in the Local Plan). We therefore consider that such measures are acknowledged within the supporting text at this point.</p>
<p>Guildford Borough Council</p>	<p>Policy L.EN5: Air Quality and Traffic-Pollution</p> <p><u>Opening paragraph</u></p> <p>14.1 It will not be clear to decision makers what a “<i>relevant assessment</i>” is. This could helpfully be explained in the supporting text.</p> <p><u>LEN5 (1)</u></p> <p>14.2 The Council <u>objects</u> to point one because it is impossible to implement. The designation of Air Quality Management Areas (AQMA) takes place outside the planning system and it is not within the power of planning decision makers or applicants for planning permission to have one designated. This requirement must be removed from the policy.</p> <p>14.3 Designation of an AQMA can be included within the plan as an aspirational policy that does not form part of the development plan. We note that the final paragraph of the supporting text includes this aspiration already.</p> <p><u>LEN5 (2)</u></p> <p>14.4 The purpose of an ecological assessment is to assess ecology relating to a development site. It is not unreasonable to expect 100+ unit schemes to carry out phase 1 ecology surveys, but they will not address the wider environment beyond the site as the policy seems to require.</p> <p>14.5 The policy as written risks crossing over into Environmental Impact Assessment (EIA) requirements. EIA development is excluded development for Neighbourhood Plans.</p>

14.6 The third sentence in the policy states that LEN5 (1)-(5) refer to sites of 100+ dwellings, but LEN5 (2) refers to “major developments” which covers sites of 10+ dwellings. This should be clarified within the text.

14.7 The issues highlighted above can be resolved by deleting the sentence from “(EA)” onwards.

LEN5 (3)

14.8 The policy refers to a “*Construction and Environmental Plan (CEMP)*”. Based on the description, (“*to manage the planning and implementation of construction activities in accordance with environmental commitments*”) this could instead refer to a Construction Transport Management Plan (CTMP), which is more frequently used to fulfil these purposes.

14.9 Requiring a CTMP for sites of 100+ dwellings is reasonable. However, the policy cannot require planning consent to be subject to formal agreement of the CTMP with the parish council; the borough council is the determining authority, and the key consultee on highways matters is the highways authority. The Council’s view is that this clause would be unlawful as it would fetter the Council’s discretion in exercising its statutory duty. The Council therefore objects to this requirement.

14.10 There is no mechanism for a CTMP to be “*live*” or for the Council to continuously review it. Planning decision makers must make decisions based on the evidence before them at the time the decision is made. This requirement must be removed as it is not enforceable.

14.11 LEN5 (3) should be rewritten to require provision of a CTMP. The policy or supporting text could then suggest what should be included and cover encouraging construction traffic to use the Strategic Road Network (currently LEN5 (4)) where possible and also propose restrictions to deliveries etc. (currently LEN5 (5)). The Council proposes that LEN5 (3)-(5) could be replaced with wording along the following lines.

3) Provision of a Construction Transport Management Plan (CTMP) at the planning application stage in respect of construction activities in accordance with environmental commitments, this should include reference to the follow matters:

HGV routing and timetabling with particular reference to Ripley village centre, Ockham Road North, Ockham Lane and Wisley Lane,

How construction traffic will be encouraged to use the strategic road network where possible and identify potential impacts on the local road network,

Restrictions for site deliveries (especially for HGVs) taking into account any local factors i.e. close proximity to schools.

LEN5 (4)

14.12 See LEN5 (3). We recommend LEN5 (4) is deleted and incorporated into LEN5 (3).

	<p>LEN5 (5)</p> <p>14.13 A blanket timing restriction is unlikely to be justified or meet the 6 tests for applying planning conditions (see paragraph 206 of the NPPF 2018). Therefore, planning decision makers are highly unlikely to apply such an approach. We recommend LEN5 (5) is deleted and some elements incorporated into point 3 (see LEN5 (3)).</p> <p>14.14 The sentence at LEN5 (5) appears to be unfinished.</p> <p><u>Supporting text</u></p> <p>14.15 The supporting text states:</p> <p><i>“The air quality results evidenced air pollution in both areas to be 20% to 50% higher than the maximum levels laid down by the EU Ambient Air Quality Directive...The main pollutants responsible are tiny carbon particles, Particulate Matter, (PM) and nitrogen oxides (NOx) and the primary generator of these pollutants is vehicle traffic (Appendix 4.1)...the TRL report highlights compelling evidence for the implementation of an air quality policy...”</i></p> <p>14.16 The evidence base for this is the Ripley High Street Air Quality Monitoring Report produced by TRL (the TRL report). The Council has received a document entitled “<i>Ripley High Street Short Form Report 13 March to 15 July 2017 v2</i>”, but has not seen the full report. This report investigated the levels of nitrogen oxides and particulate fractions at PM10 and PM2.5 in Ripley High Street and Newark Lane.</p> <p>14.17 Regarding nitrogen oxides, the TRL report states “<i>The average NO2 concentration for the four month monitoring period is 43.6 µg/m3. This is above the annual mean objective limit of 40 µg/m3 set out in the AQS [UK Air Quality Standards, which are the same as the EU standards for the pollutants in the TRL report]. These results should be treated with caution as data only cover a four month period and may not exceed the annual mean objective if a longer monitoring period was undertaken.</i>”</p> <p>14.18 Regarding particulates the report states “<i>The average PM10 concentration for the four month period is 18.1µg/m3 this is below the annual mean objective limit of 40µg/m3</i>” <u>a_n_d_</u> “<i>The PM2.5 concentration during the monitoring period has an average of 7.6µg/m3. There are no set objective limits for England only that work should be done to reduce concentrations/ emissions of fine particulate matter. However the objective limit that has been set for Scotland is 10µg/m3 which the average concentrations at Ripley are below.</i>”</p> <p>14.19 It is not clear how the TRL report can be reconciled with the statement in the LNP that “<i>The air quality results evidenced air pollution in both areas to be 20% to 50% higher than the maximum levels laid down by the EU Ambient Air Quality Directive</i>” as the report states that particulate levels are below the maximum levels, and while it is possible that NO2 limits are being exceeded by around 10% (not 20 to 50%), this cannot be verified without further testing and therefore there may not be an exceedance at all. This does not meet the requirement for policies to be based on “proportionate and robust evidence” and therefore does not meet the basic conditions.</p>
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	<p>14.20 The Council has been carrying out air quality monitoring for Nitrogen Dioxide in Ripley High Street and Newark Lane. The monitoring over the last full calendar year does not show exceedance of the AQS when data is annualised. The data for the current calendar year so far are similar. The results can be seen on the following link: https://www.guildford.gov.uk/article/19807/Air-quality-monitoring</p> <p>14.21 The Council is of the view that the data in the TRL report is not wholly representative of the air quality situation as it has not been distance adjusted to the nearest receptor in line with standard practice, as set out in the Defra Nitrogen Dioxide fall-off calculator. https://laqm.defra.gov.uk/tools-monitoring-data/no2-falloff.html The LNP group have previously stated that distance adjustment is not necessary as one or more of the test tubes was adjacent to the road. However, no information on the siting of the tubes is set out in the short form of the TRL report, and in any event, the data is incomplete until a distance adjustment exercise has been undertaken, even if only to demonstrate that no distance adjustment is necessary. If the distance adjustment has been undertaken, this needs to be set out in the report for transparency.</p> <p>14.22 The TRL report is referred to in the plan as supporting evidence and should be published in full as a supporting document on the Lovelace Plan website. The examiner will need access to report in order to assess whether the policy is based on proportionate and robust evidence.</p> <p>14.23 The final paragraph refers to an “<i>air quality monitoring area</i>”. This should be “<i>air quality management area</i>”.</p>
Savills obo WPIL	<p>Objection, L.EN 5 Air Quality & Traffic Pollution</p> <p>4.64. Policy L.EN5 does not appear to have been adequately evidenced to justify the policy requirements. WPIL concerns on this policy include:</p> <ul style="list-style-type: none"> ▪ The first paragraph of the policy outlines that development will be supported if they do not “<i>significantly reduce air quality</i>”, however no indication is provided as to what a significant impact is considered to be or how this evidenced; ▪ Point 1 does not accurately reflect the National Objectives and Ambient Air Quality Directive and does not reflect Ripley currently not exceeding the EU limit values based on national modelling; ▪ Point 1 also appears to be requesting that GBC designated Ripley High Street as an AQMA which cannot be undertaken through a Neighbourhood Plan and this part of the policy is therefore not effective; ▪ Point 2 refers to a Ecological Assessment, however, it is not clear what is meant by this or what this should include. This appears to be a misunderstanding of the ecological assessments that can be undertaken; ▪ The supporting text includes proposals such as a crossing situated at Ripley High Street / Newark Lane, introduction 20mph zone and banning HGV’s from Ripley High Street. Whilst this does not form part of the policy L.EN 5 the proposed measures are considered unlikely to be deliverable and it is unclear how these measures would impact on air quality;

	<ul style="list-style-type: none"> ▪ Supporting text refers to the Lovelace air quality surveys undertaken, however, during the appeal in respect of Former Wisley Airfield the Inspector found these to be of limited value. <p>4.65. Change required: This policy and the supporting text should be amended to reflect national policy and relevant legislation, contain reasonable and justified proposals that are evidenced to reduce air quality and provide further detail on required assessments. Importantly, the Policy should either be significantly reworded or deleted in order to be accurate and to reflect appropriate national policy and legislation. The matter of air quality and pollution is covered by the eGBLP policy framework. WPIL therefore considers that the policy should be deleted.</p>
<p>Infrastructure (general)</p> <p>Iceni obo Ptarmigan Land</p>	<p>Chapter 8: Infrastructure</p> <p>3.31 This section of the plan has been reviewed by Motion, Ptarmigan’s transport consultants, who note that there are several policies that include a transport focus under the heading of ‘Infrastructure’, including L.I1; L.I2; L.I3; and L.I4. Ptarmigan broadly supports the principle of these policies as they are largely consistent with their equivalents in the emerging GBC Local Plan, whilst aspects of the measures referenced within these policies are also included in the draft wording of Policy A43. For example, the need to operate Travel Plans and providing effective pedestrian/cycle links to the existing infrastructure. As with all large-scale developments there is also an acceptance that a proportionate contribution should be made to commercial bus services in order to improve the frequency of public transport.</p> <p>3.32 However, there is only anecdotal evidence provided to justify the parking standards that are included within draft Policy L.I4. Of particular note is the lack of any relevant car ownership data for the local area to justify the minimum standards (para. 105 of the 2018 NPPF refers) and no supporting evidence to justify car parking spaces that are 6 metres long. By way of a comparison, SUVs are typically in the range of 5 metres and executive class vehicles are 5.2 metres. With this in mind, Ptarmigan Land recommends that the content of this policy is reconsidered before it can be taken forward to Examination.</p> <p>3.33 The sixth paragraph on page 67 refers to developments at either end of the ward being isolated. We would assert that this is not the case for the Garlick’s Arch Site which will form a well-integrated development with strong links with the existing village. The allocation provides a significant opportunity to create a sustainable community knitting together the existing ‘ad-hoc’ areas of the village, creating a more sustainable critical mass which will deliver significant sustainable benefits.</p> <p>3.34 As part of the development, there is the potential to provide a local convenience shop which would serve local residents and reduce the need to travel for day-to-day essentials. Meanwhile the illustrative masterplan for Garlick’s Arch includes provision for a new sports pitch together with a community woodland. The detail of this provision would be worked up via the planning application, and having regard to the needs and priorities of the local community.</p> <p>3.35 The site is accessible by sustainable modes of transport including a well-established pedestrian network, existing bus routes that incorporate Clandon Railway Station and cycle lanes along Portsmouth Road. Development of the site presents</p>

	opportunities to enhance existing accessibility through improvements to the local pedestrian network, bus services and stops, and additional cycle lanes.
<p>Changes to Plan</p> <p>Policy L.EN5: Air Quality and Traffic Pollution</p>	<p><i>Policy L.EN5 renamed as Policy LNPEN5 – Air Quality and Traffic</i></p> <p><i>It was recognized that this policy needed amending and further advice from consultants was required to have a policy which looked at mitigating future construction and residential traffic and to address pedestrian safety.</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
<p>Policy L.I.1: Infrastructure</p> <p>Guildford Borough Council</p>	<p>Policy L.I1: Infrastructure Policy</p> <p>15.1 The Council supports the requirement for adequate levels of infrastructure to be provided when first needed.</p> <p>Supporting text</p> <p>15.2 The supporting text states “...traffic from TFM, the RHS and general traffic to the north of Ripley would need to travel through Ripley High Street to access the Garlicks Arch slip roads. As traffic is currently the main problem in Ripley, it is difficult for locals to consider this as mitigation.”</p> <p>15.3 The Guildford Borough Local Plan (2018) includes new north-facing junctions to the A3 at the A247 Burnt Common interchange to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.</p> <p>15.4 The slip roads provide mitigation for the otherwise increase in traffic flows from development at the former Wisley airfield site by creating ‘headroom’ for development traffic by removing and shifting some of the existing traffic that uses Ripley High Street and other routes to/from the A3 via the Ockham Interchange. This traffic is attracted to use the new slip roads at Burnt Common and avoids Ripley High Street.</p> <p>15.5 The Burnt Common slip roads were accepted by the Inspector at the Local Plan Examination.</p> <p>15.6 The third paragraph under the policies refers to Grampian conditions. A Grampian condition is a condition included with a permission that prevents the start of a development until off-site works have been completed. It is frequently used for infrastructure, but does not have to be limited to infrastructure, as suggested by the third paragraph.</p> <p>15.7 The term “legal agreement” more accurately describes S106 rather than CIL. The following amendment is suggested to the third paragraph of the supporting text:</p>

	<p><i>“...these are secured through ‘Section 106 (S106) agreements or the Community Infrastructure Levy (CIL). A S106 agreement between the between the developer and the Local Planning Authority to provide or pay for infrastructure whereas CIL is a charge placed on developers to fund infrastructure. S106 funds are tied to meeting the needs that arise from the development while CIL funds can be spent on a wider scale...”</i></p>
<p>Changes to Plan</p> <p>Policy L.I.1: Infrastructure</p>	<p><i>Policy L.I.1 is now Policy LNP I1</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
<p>Policy L.I.2: Public Transport and Green Travel</p> <p>Network Rail</p>	<p>The proposed developments are not concentrated in one location in the Lovelace area but at several potential sites, with one in particular (Three Fields Meadow) seeing greater development. The fact that there is no railway station in or immediately adjacent to the local settlements means that people have to travel (normally by car) to neighbouring towns, principally Woking with many commuting to London by there. According to the document, there are very few existing bus services, particularly to or from Woking. If this was the case then it would be very difficult to provide bus services almost from scratch from the Lovelace area.</p> <p>However, the plan does not appear to have taken full account of the existing hourly bus service from Guildford to Woking (462/463) which appears on the Surrey County Council website. To provide better public transport connections to key railway stations that are situated outside the Lovelace area, it is suggested that developer funding is sought to enhance the frequency to 30 minutes. This would make the service much more attractive to new residents than an hourly service. The local authority should work closely with bus and train operators to investigate what service would provide the greater chance of modal shift from private car to public transport.</p> <p>For those people who remain car users, it is likely that there will be an impact on car parking at those key stations. Network Rail is working with Woking Borough Council on a land strategy that seeks to understand the development opportunities around Woking Station. A part of this strategy is looking at how car parking can be consolidated and improved at the station to release land for development; this would provide potential benefits to Lovelace residents who are parking at the station.</p> <p>Also at Woking there is a scheme in development to increase capacity through Woking Junction and increase platform capacity at the station. This scheme is the first step in providing the capacity (additional trains) for an increased level of service that addresses overcrowding and meets future growth on the railways. Following the Woking scheme, future replacement of the existing signalling systems with digital control and the implementation of Crossrail 2 (although Crossrail 2 services won't actually be operating to stations used by Lovelace residents) will also enable additional services to operate thereby providing additional seats for rail users from the new Lovelace developments. There are also aspirations for a new rail link to London Heathrow airport from Woking and Guildford that Network Rail is investigating with DfT.</p>

	Thank you for giving us the opportunity to take part in your consultation.
Guildford Borough Council	<p>Policy L.I2: Public Transport and Green Travel</p> <p><u>L12 (1)</u></p> <p>16.1 L12 (1) is effective only as long as the “<i>Surrey County Council Green Travel Plan Good Practice Guide 2010</i>” is the currently adopted guidance. It is suggested that the policy could be future-proofed by adding something to the effect of “(or any subsequent publications)” after “2010”.</p> <p><u>L12 (2)</u></p> <p>16.2 L12 (2) withholds support for any significant development (defined in the plan as 100+ homes) that does not provide a public bus service.</p> <p>16.3 The wording is problematic because development will not be able to “provide” a bus service, but they may be able to contribute to a bus service or at very best they will be able to commission a bus service and provide funding for it.</p> <p>16.4 Commissioning a bus service is likely to be considered unduly onerous for all but the very biggest developments. The policy could provide flexibility by asking for “a public bus service, or contributions towards a public bus service”. However, infrastructure and contributions can only be sought where they are directly related to the development, and funding a bus service that will be used by a wider community may not meet that test. Where funding contributions are sought, it would need to be predicated on the existence of a proposal for a bus service, otherwise the money could not be spent. If a bus service already exists, it would be questioned as to why it needs funding at all.</p> <p>16.5 If the parish councils are planning to set up a community bus service it could potentially become a target for funding. If not, it is suggested that SCC is contacted to find out whether it is considering providing a community bus service that could receive funding.</p> <p>16.6 Buses should be commercially viable and development would normally only provide funding to cover an initial period up to the point that the development is complete and the service can be funded through ticket sales to the new residents. The routing of the service is a commercial decision for the operator. It could go to Woking, but if more people want to go to Guildford or Effingham Junction that should be an option, and the policy should allow flexibility for this to be decided on a case-by-case basis.</p> <p>16.7 As currently written, the Council would not be able to implement L12 (2). Therefore, it <u>objects</u> to L12 (2).</p> <p><u>L12 (3)</u></p>

	<p>16.8 LI2 (3) is fine in principle and the Council supports this provision. However, it would be helpful to specify what standard of charging point is required and how many (e.g. how many units or parking spaces per charging point). The fast charging points can incur a significant installation charge from power providers and this should be taken into account.</p> <p><u>LI2 (4)</u></p> <p>16.9 The provision of infrastructure for car clubs is supported in principle. However, it should not be a requirement as car clubs need a critical mass in order to operate, and if there is no car club operating in the area there is no point providing a space.</p> <p>16.10 This is not a reasonable requirement for all scales of “major development” (e.g. developments of 10 homes). This may be reasonable for developments of 100+ homes.</p>
<p>Savills obo WPIL</p>	<p>Section 8: Transport Policies</p> <p>4.66. Objection, Policy L.12, L.13, L.14 and L.17 (Public Transport, Cycling, Parking & Infrastructure)</p> <p>4.67. In line with the objections made above with respect of transport matters (sections 2 and 3 of the LNP), these policies should not affect nor contradict the eGBLP and are currently not considered to be effective.</p> <p>4.68. Change required: The plan is not strategic, and hence it must be made clear that these various transport policies do not affect Allocation A35 (Former Wisley Airfield).</p> <p>4.69. Text should be added to each policy (new text underlined): <i><u>This policy applies to non-strategic development only.</u></i></p>
<p>Changes to Plan</p> <p>Policy L.I.2: Public Transport and Green Travel</p>	<p><i>Policy L.I.2 is renamed Policy LNPI2.</i></p> <p><i>The comments were considered and the policy and justification amended.</i></p>
<p>Policy L.I.3: Cycle Lanes and Public Footpaths</p> <p>Guildford Borough Council</p>	<p>Policy L.I.3: Cycle Lanes and Public Footpaths</p> <p><u>LI3 (1)</u></p> <p>17.1 S106 agreements can be used to secure provision of infrastructure as well as secure financial contributions. It is suggested that LI3 (1) is rewritten to state “<i>S106 agreements to secure provision of, or contributions towards, appropriate improvements to cycling and walking routes within the development site and to link the development to existing cycle routes</i>”</p>

	<p><i>and footpaths</i>". This amendment will also align the policy with the note at the end of the policy. At present, LI3 (1) calls for (financial) contributions while the note calls for provision.</p> <p><u>LI3 (2)</u></p> <p>17.2 Preservation of existing links may not be possible in all situations. Therefore, "<i>must</i>" should be changed to "<i>should</i>".</p> <p><u>LI3 (3)</u></p> <p>17.3 As above, <i>must</i>" should be changed to "<i>should</i>" as this may not always be possible (e.g. if there are no networks to link into).</p> <p>17.4 The local parish councils can only be consulted on schemes by the Council. If the parish councils want involvement in planning schemes, that must come directly from the developers. The requirement for "<i>Any significant development...[to] involve the local parish councils</i>" therefore should be aspirational and in the supporting text, not the policy.</p>
<p>Savills obo WPIL</p>	<p>Section 8: Transport Policies</p> <p>4.66. Objection, Policy L.12, L.13, L.14 and L.17 (Public Transport, Cycling, Parking & Infrastructure)</p> <p>4.67. In line with the objections made above with respect of transport matters (sections 2 and 3 of the LNP), these policies should not affect nor contradict the eGBLP and are currently not considered to be effective.</p> <p>4.68. Change required: The plan is not strategic, and hence it must be made clear that these various transport policies do not affect Allocation A35 (Former Wisley Airfield).</p> <p>4.69. Text should be added to each policy (new text underlined): <u><i>This policy applies to non-strategic development only.</i></u></p>
<p>Changes to Plan</p> <p>Policy L.I.3: Cycle Lanes and Public Footpaths</p>	<p><i>Policy L.I.3 is renamed as Policy LNPI3.</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
<p>Policy L.I.4: Parking</p>	<p>Policy L.I.4: Parking</p> <p>18.1 The policy sets parking standards for the whole of the Lovelace Neighbourhood Area. However, the supporting text states that there is no need for car parking management in Wisley and Ockham (final paragraph, page 75). If this is the case,</p>

<p>Guildford Borough Council</p>	<p>the policy should be amended so that it only applies to Ripley village, as the supporting text states that this is where it is needed.</p> <p><u>LI4 (2)</u></p> <p>18.2 LI4 (2) sets minimum sizes for parking spaces. While the Burpham Neighbourhood Plan parking policy passed examination with the same minimum sizes, the sizes are very large when compared to the standard set out in the Manual for Streets (page 110), which is the government’s guidance on street planning: https://www.gov.uk/government/publications/manual-for-streets</p> <p>18.3 The LNPG should consider whether these increased sizes are necessary, and whether there might be unintended negative impacts from the provision of these large parking spaces, for example on the visual appeal of the frontages of new properties, or the provision of fewer spaces to support the development.</p> <p>18.4 If the sizes are retained, the supporting text should explain why these sizes are needed. At present, it is silent on the matter. One of the basic conditions is that policies must be supported by proportionate and robust evidence. Other neighbourhood plans may set out a justification than could be applied to Lovelace.</p> <p><u>LI4 (3) to (7) and (9) and (10)</u></p> <p>18.5 The number of parking spaces required by LI4 (3) are the same as the standards in the Burpham and Effingham neighbourhood plans, except for 3 bed units which require an additional parking space. Both these plans have passed examination, which could indicate that a similar standard could be considered acceptable during the examination of the LNP. Consideration is needed as to whether the additional space is needed for 3 bed homes.</p> <p>18.6 LI4 (5) and (7) are slightly re-worded copies of each other; LI4 (7) is better defined and therefore more useful in decision making. LI4 (5) can be deleted.</p> <p><u>LI4 (8)</u></p> <p>18.7 LI4 (8) appears to be missing.</p> <p><u>LI4 (11)</u></p> <p>18.8 LI4 (11) states “<i>There will be support for land around the settlement areas, particularly Ripley Village, to be repurposed in perpetuity where the relevant Parish council considers it appropriate.</i>” From the sub-heading “<i>Public Parking</i>”, we assume this is intended to support planning applications that would provide public parking. LI4 (11) should make this clear.</p>
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	<p>18.9 Planning applications would either be for change of use, or for built development (e.g. surfacing or engineering works) necessary to provide a parking area. Other forms of repurposing would not require planning permission. LI (11) should be worded in a way that applies to planning applications and avoid the term “repurposed”.</p> <p>18.10 The final part: “<i>where the relevant Parish council considers it appropriate</i>”, is problematic as it appears to link planning permission to the agreement of a parish council. This would fetter the Council’s discretion when exercising its statutory duty and as a result may be unlawful. Therefore, the Council must <u>object</u> to this part of LI4 (11).</p> <p>18.11 It is not clear why a parking area in perpetuity would be supported, but not a parking area that is not secured in perpetuity, as most public parking areas are likely to fall into the latter category. We assume perpetuity is preferred, but that other parking is also welcome. The requirement for the land to be locked away as parking land in perpetuity may deter potential providers. Consideration should be given as to whether “<i>in perpetuity</i>” is helpful.</p> <p>18.12 LI4 (11) could be rewritten along the following lines in order to address the issues above: “<i>Planning applications for new parking areas around the settlement areas, particularly Ripley Village, will be supported, with an aspiration that these will be secured in perpetuity.</i>”</p> <p><u>LI4 (12) to (14)</u></p> <p>18.13 The Council supports the provision of cycle spaces and the plan’s strong focus on sustainable transport. However, it should be noted that the Burpham Neighbourhood Plan examiner recommended the deletion of the requirement for cycle spaces (pages 41 and 42 of the examiner’s report), citing the assumption of 100% cycle use (one cycle for every unit) was very high. We suggest the standard of one cycle space per unit in a block of flats is reconsidered in light of this and consideration is given as to whether more modest standards would fare better at examination.</p>
Savills obo WPIL	<p>Section 8: Transport Policies</p> <p>4.66. Objection, Policy L.12, L.13, L.14 and L.17 (Public Transport, Cycling, Parking & Infrastructure)</p> <p>4.67. In line with the objections made above with respect of transport matters (sections 2 and 3 of the LNP), these policies should not affect nor contradict the eGBLP and are currently not considered to be effective.</p> <p>4.68. Change required: The plan is not strategic, and hence it must be made clear that these various transport policies do not affect Allocation A35 (Former Wisley Airfield).</p> <p>4.69. Text should be added to each policy (new text underlined): <i>This policy applies to non-strategic development only.</i></p>
Changes to Plan	<i>Policy L.I.4 is renamed as Policy LNPI4</i>
Policy L.I.4: Parking	<i>The comments were taken into consideration and the policy and justification amended.</i>
Policy L.I.5:	Policy L.I.5: Provision of Community Facilities

<p>Provision of Community Facilities</p> <p>Guildford Borough Council</p>	<p>19.1 LI5 (1) appears not to support proposals for increases/improvements to community facilities on land that is not publicly owned. We believe this is a drafting error and if so, the words “<i>on Local Authority- or community-owned land</i>” should be removed.</p> <p>19.2 The wording of LI5 (2) does not make sense when read after the opening paragraph. It is suggested that LI (1) could simply be appended to the first paragraph and LI2 (2) could become the second paragraph in the policy (i.e. remove the numbering and change text to bold).</p>
<p>Woodland Trust</p>	<p><u>Community Facilities and Activities</u></p> <p>Whilst Policy L.15 (Provision of Community Facilities) does identify the fact that any shortfalls in community provision is going to be acknowledged as something is taken forward, protecting natural features such as community space provision should also be taken into account. It should seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new development proposals, such as housing. There are Natural England and Forestry Commission standards which can be used with developers on this:</p> <p>The Woodland Access Standard aspires:</p> <ul style="list-style-type: none"> • That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. • That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes. <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication <i>Stemming the flow</i> – the role of trees and woods in flood protection - https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/.</p>
<p>Changes to Plan</p> <p>Policy L.I.5: Provision of Community Facilities</p>	<p><i>Policy L.I.5 is renamed as Policy LNPI5</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
<p>Policy L.I.6:</p>	<p>Policy L.I.6: Healthcare and Education</p>

<p>Healthcare and Education</p> <p>Guildford Borough Council</p>	<p>20.1 It is vital that development is planned in such a way that takes account of healthcare and educational needs such that appropriate provision can be made to meet the needs of the current and future population. Therefore, the <u>principle</u> of LI6 is supported.</p> <p>20.2 Significant developments (defined as 100+ dwellings) are likely to engage in pre-application discussions with the Council, which will likely cover healthcare and education provision. The problem with requiring developers to engage with SCC and CCGs directly is that the Council will not be able to accept second hand evidence submitted by the developer and will need to engage directly with SCC and the CCGs itself. Therefore, LI6 (1) will result in a duplication of processes for SCC, and the CCGs, with no discernible benefit. Therefore, the Council would like LI6 (1) to be removed.</p> <p>20.3 The needs of healthcare and education are already addressed as part of the planning process and the Council’s view is that there is no need for further policy at the neighbourhood level. These are strategic matters and the NPPF 2018 makes it clear that strategic policies should not be included in neighbourhood plans.</p> <p>20.4 The CCGs in particular have limited resources and may not be able to service developer requests for engagement. If LI6 (1) is retained, engagement with the CCGs is necessary to demonstrate that the requirement is achievable.</p>
<p>Changes to Plan</p> <p>Policy L.I.6: Healthcare and Education</p>	<p><i>Policy L.I.6 is renamed as Policy LNPI6.</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
<p>Policy L.BE1: Change of Use from Commercial to Non-Commercial</p> <p>Guildford Borough Council</p>	<p>Policy L.BE1: Change of Use from Commercial to Non-Commercial</p> <p><u>First paragraph</u></p> <p>21.1 The wording of the first paragraph is confusing. It states “<i>Proposals which would result in the loss of shops and pubs... will not be supported</i>” but then states “<i>support is provided where.</i>” in the next sentence. We assume loss of shops etc. is not supported in any circumstances and that support for new employment floor space is supported subject to LBE1 (1) to (9), so suggest that the first paragraph could be reorganised as follows:</p> <p><i>“Proposals that would result in the loss of shops and pubs, particularly in Ripley village centre, or community facilities, or requiring HGV movements though the villages will not be supported. Proposals that provide sustainable growth and expansion of employment floor space to create or expand employment opportunities will be supported. Support is provided where:...”</i></p> <p>21.2 The policy could benefit from wording that refers to use classes, rather than just referring to the loss of shops, pubs and community facilities, as the present wording may introduce ambiguity during planning decisions. For example, it is unclear</p>

	<p>whether the policy would permit a shop to change use to a pub and vice versa. Not all community facilities are commercial in nature, so it ought to be clarified as to whether this policy applies to loss of any community facility or just to those with a commercial activity, and whether it refers to class A uses or other business and employment uses as well.</p> <p>21.3 The retention of pubs as traditional drinking establishments (A4 use) by preventing their change of use to pubs/restaurants (A4 with A3 use) is impossible to enforce as the Use Classes Order (2017) makes this change of use permitted development. Change of use from either of these uses to another A Class use does, however, now require planning permission, so the policy would still be able to prevent changes of use from pubs to certain other uses; although for clarity, the policy should clearly indicate whether a minimum marketing period applies (see below).</p> <p>21.4 The phrase “<i>particularly in Ripley village centre</i>” is superfluous as the policy applies to changes of use both within and outside the village centre boundary.</p> <p><u>LBE1 (4), (5) and (6)</u></p> <p>21.5 LBE1 (5) and (6) appear to be sub-criteria of LBE (4). For clarity, the criteria list should be set out as in the example given in “General comments about the plan” at the start of this document.</p> <p>21.6 LBE1 (4), (5) and (6) are not clearly drafted and should be reworded, as it is difficult to understand to which use classes the proposed six-month marketing requirement applies (i.e. whether it applies to any commercial and/or non-residential uses not referred to in LBE1 (5) and (6)).</p> <p>21.7 LBE1 (4) requires marketing evidence to be provided alongside a planning application for changes of use from any commercial business, which would include B2 and B8 uses, D class and sui generis uses for example, whereas the marketing requirements in LBE1 (5) and (6) appear to contradict this by applying only to specific commercial uses. The policy should clarify this point.</p> <p>21.8 The restriction on HGV movements through the village centre would prevent many changes of use to B8 uses from taking place. Although the intention of this wording was probably to reduce noise impacts on residents, the effect may be to prevent changes of use from vacant units, which may be considered to conflict with national planning policy, in particular chapter 6 of the NPPF. It may be preferable for the local economy for such uses to be replaced with an active B8 use if any use of HGVs does not cause severe traffic impacts or other adverse impacts on local residents. LBE1 (3) already addresses the issues of noise, smell or nuisance, so if the reference to HGV movements were deleted it should not reduce the policy’s effectiveness at dealing with inappropriate changes of use.</p> <p><u>LBE1 (7)</u></p> <p>21.9 The example in LBE1 (7) would work better in the reasoned justification rather than in the policy itself.</p>
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	<p><u>Supporting text</u></p> <p>21.10 In the reasoned justification, the third paragraph down on page 84 states that the marketing requirement is in L.BE1, (3), which should state L.BE1, (4).</p>
<p>Changes to Plan</p> <p>Policy L.BE1: Change of Use from Commercial to Non-Commercial</p>	<p><i>Policy L.BE1 is renamed to Policy BE1.</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
<p>Policy L.BE2: Agricultural and Horticultural Land Use</p> <p>Guildford Borough Council</p>	<p>Policy L.BE2: Agricultural and Horticultural Land Use</p> <p><u>LBE2 (2)</u></p> <p>22.1 The requirement in LBE2 (2) for agricultural and horticultural proposals to continue to provide employment would be impossible for any applicant to demonstrate, as a business cannot guarantee its future performance. It is suggested that “<i>continue to</i>” could be omitted.</p> <p><u>LBE2 (4)</u></p> <p>22.2 LBE2 (4) states that the development should conform to Policy L.BE1 (4) regarding negative impacts and loss of amenity. This cross-reference should be to L.BE1 (3).</p>
<p>Changes to Plan</p> <p>Policy L.BE2: Agricultural and Horticultural Land Use</p>	<p><i>Policy L.BE2 is renamed as Policy LNPBE2</i></p> <p><i>The comments were taken into consideration and the policy and justification amended.</i></p>
General Comments – Not Policy Related	
<p>Southern Water</p>	<p>Thank you for your email below, inviting Southern Water to comment on the Lovelace Neighbourhood Plan. However, I confirm that Southern Water does not supply water or wastewater services to Ripley or Ockham Parishes, and therefore does not have any comments to make on the Plan.</p>

<p>East Horsley Parish Council</p>	<p>Thank you for inviting East Horsley parish council to comment on the Pre-submission draft of the Lovelace Neighbourhood Plan. This draft has now been reviewed by our councillors who would like to congratulate the Lovelace team on producing a clear and well-prepared neighbourhood plan.</p> <p>East Horsley parish council has no objections to the policies proposed in this neighbourhood plan.</p>
<p>Surrey Hills AONB</p>	<p>Thank you for forwarding the consultation draft neighbourhood plan to us. The Plan area does not include any part of the Surrey Hills AONB and I cannot see that it involves anything impacting upon the AONB or its setting.</p> <p>All the best with progressing your plan.</p>
<p>Ripley Farmers Market</p>	<p>Our concerns for the future are as follows -</p> <p>Urbanisation of Ripley. The village stands as an attractive village which is distinct from Send, Ockham and other nearby villages. The farmers market is very much part of the village "atmosphere" and we would be concerned that any over development would deter customers (many of whom do come from afar) visiting to enjoy the rural aspect of the market.</p> <p>While we open up the "bonfire" carpark during the market, many customers do park in the village. As we all know, parking in Ripley is a perennial problem and any large increase in housing in the ward would not be helpful.</p> <p>Equally congestion can be a problem. If customers find their visit is subject to long queues to get in and out of the village and find limited parking space they will be less likely to return.</p> <p>The ability of the village to thrive and maintain a wide selection of families of all ages depends on having a village school. Without this the long term future of Ripley as a village for all would be questionable which would not help the farmers market to prosper.</p> <p>The lack of affordable housing. And by this we mean proper affordable housing - not what property developers regard as affordable. Without the ability of young people and young families to afford property in Ripley, the village will turn into a sleepy old peoples home! The farmers market is very keen to try and bring younger people and families to the market which is being undermined by the closure of the school and lack of properly affordable housing.</p> <p>Over the last 15 years the farmers market has become an integral part of our village and undoubtedly brings people into the village who then use the high st shops, pubs and restaurants and not only on farmers market days. Any wholesale changes to our village will not be helpful to a continuing of this success.</p>
<p>Woking Borough Council</p>	<p>Thank you for sending through the Lovelace Neighbourhood Plan pre-submission document. The document appears to provide a comprehensive analysis of local issues relevant to planning and a localised policy approach to deal with them. We assume that appropriate steps have been taken to ensure general conformity with Guildford's recently examined Local Plan.</p>

	<p>We do not have anything further to add at this stage, but wish to be kept informed of subsequent stages of the process.</p>
The National Trust	<p>I refer to the Lovelace Neighbourhood Plan Regulation 14 Consultation which the Clerk to Ripley Parish Council has drawn to our attention.</p> <p>As noted in the Plan the National Trust is the owner of the River Wey Navigation which demarcates part of the north western boundary of the Plan area and crosses through the Plan area for about 0.5km of its length to the east of Newark Lane.</p> <p>Having reviewed the draft Plan we have no comments to make on the content of the Plan, however, we suggest that reference should be included in the Plan to the designation of the River Wey Navigation as a conservation area. We also think it would be useful to include a cross reference in the Plan to the National Trust’s Planning Guidance for development next to the River Wey and Godalming Navigations (copy attached). We would expect the policies contained in the Neighbourhood Plan to align with our guidance which, in brief, seeks to preserve and enhance the character and appearance of the River Wey Navigation. Given the importance of this aspiration we think that the Plan should make explicit reference to it.</p> <p>We would be pleased if you could keep us informed about the next stage in the formulation of the Neighbourhood Plan.</p>
Send Parish Council	<p>Thank you for contacting Send Parish Council as a Statutory Consultee, to seek our views about the Lovelace Neighbourhood Plan before it is submitted to Guildford Borough Council for examination. We have been pleased to review the plan as requested and this is our response:</p> <p>I can confirm that Send Parish Council, as a Statutory Consultee, has considered your proposals and draft policies. I can advise you that the Council support both your policies and approach. The decision not to include further sites is noted and again one Send Parish Council supports.</p> <p>You may be interested to note that the approach undertaken by Lovelace generally reflects that being taken by my Council at this time. A minor difference is that we call our planning document a Neighbourhood Development Plan as residents were confused as to its purpose.</p>
SGN	<p>Thank you for your email asking for comments on the Lovelace Neighborhood Plan. SGN is preparing for the next Price Control Period (RIIO-GD2), due to commence 2021, and welcomes all input from Local Authorities that provides intelligence on proposed development within their respective areas. This information will assist us in identifying potential growth and associated reinforcement requirements.</p> <p>SGN has carried out a high level assessment of the impact of developments contained within the Local Plan, Housing Land Audit and Employment Land Supply documents and can comment as follows:</p> <p><u>NETWORK OVERVIEW</u></p>

SGN's network within Guildford Borough Council, areas is energized by the South Local Transmission System (LTS) with and supported by the integrated IPMP system. Transmission Regulator Stations (TRS) are located across the center of the region, reducing pressure to the High Pressure (HP) Intermediate (IP) and Medium (MP) pressure systems. In some instances pressure is reduced from IP to MP by means of District Pressure Governors (DPG). In turn, the IP/MP systems are further broken down to Low Pressure (LP) systems directly supplying the majority of existing domestic customers.

STRATEGIC DEVELOPMENT AREAS

Through the assessment of the impact of developments there are no areas of significant concern which result in the requirement of network reinforcement. There is no new reinforcement required from the latest local plan or sites which may have significant impact, compared to the potential existing ones. SGN's infrastructure will not be severely affected from the additional developments described on the latest local plan.

Below is a short synopsis of the networks supplying these areas where reinforcement will may be required in the medium and long term.

For the Ripley and Ockham Parish Councils area, reinforcement of the IP/MP Grid will be required, if gas is to play a major role in meeting the energy requirements of any potential developments identified in the local plans. If said developments are phased as set out in the various LDPs, then the reinforcements will be necessary in ensuring that security of supply is maintained. It is of paramount importance to stress that the timelines and capacities that are quoted in the various LDP documents are not concrete and are, therefore, subject to change such as the reinforcements accompanying them .

STATUTORY OBLIGATIONS

Where required, SGN will look to manage the provision of any off site infrastructure improvements, in line with the overall development growth and/ or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for IPMP networks, and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system, but may also include the installation of above ground apparatus involving land purchase.

As this is a high level assessment and response, the information provided is indicative only and should be used as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the department of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:-

Section 9 (1) and (2) which provides that:

	<p>9. General powers and duties</p> <p>(1) It shall be the duty of a gas transporter as respects each authorized area of his:- (a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and (b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him - (i.) to connect to that system, and convey gas by means of that system to, any premises; or (ii.) to connect to that system a pipe-line system operated by an authorized transporter.</p> <p>(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.</p> <p>(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination - (a) in the connection of premises or a pipe-line system operated by an authorized transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.</p> <p>SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.</p> <p>As SGN is the owner and operator of significant gas infrastructure within the Guildford area and due to license holder obligations;</p> <ul style="list-style-type: none"><input type="checkbox"/> Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.<input type="checkbox"/> Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process. <p>SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted.</p> <p>Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we</p>
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	<p>would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.</p> <p>Please let me know if the above information is sufficient for your requirements at present.</p>
<p>Highways England</p>	<p>Thank you for inviting Highways England to comment on the above document.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25 motorway.</p> <p>We have reviewed the Lovelace Neighbourhood Plan Regulation 14 Consultation and have 'No Comments'.</p>
<p>Savills obo WPIL</p>	<p>5.1. The principal objections to the LNP are:</p> <ul style="list-style-type: none"> ▪ In its current form the LNP should not be submitted for Examination as it is not consistent with the emerging Guildford Borough Local Plan (eGBLP) and is likely to be unsound. The eGBLP is significantly advanced and has been through the Examination Hearings. Given the likely timescales for progressing the LNP, it is highly probable that the eGBLP will be adopted prior to the adoption of the LNP. It is therefore not constructive or time efficient for the NP Group to progress a plan that is not consistent with the eGBLP and this would be contrary to the NPPF; ▪ The LNP includes a significant amount of text which is not considered to be relevant to the LNP or its policies. This should be refined to ensure that the LNP does not include information which is not relevant to the Plan itself. The LNP should be focused on policies to regulate the use of land, and to cause an affect. Background detail can be left to supporting documents; ▪ There is reference to Former Wisley Airfield as “Three Farms Meadow” (TFM) and a general negative tone in the LNP in respect of this strategic development which is a key part of the eGBLP. As, on adoption, the LNP will form part of the development plan for the area it is not appropriate for such a tone to be adopted within the Plan. TFM is not an officially recognised name, and reference to it will simply cause confusion and risk ambiguity – all references to it should be deleted; ▪ In respect of the housing and transport polices within the LNP, these are not clear and do not relate to strategic sites allocated within the LNP by the eGBLP. It must be made clear that the majority of the LNP does not (and cannot) affect the strategic designation A35 at the Former Wisley Airfield; and ▪ In respect of some environmental policies within the LNP, greater appreciation of the evidence base is required.

	<p>5.2. Fundamentally, it must be made clear within the LNP that it is non-strategic and that its policies therefore do not relate to the strategic allocations within the LNP area. The LNP must not constrain development that is set out in the eGBLP. The LNP should therefore be redrafted and further consultation undertaken.</p>
<p>Woodland Trust</p>	<p><u>Woodland Trust Publications</u></p> <p>We would like to take this opportunity to draw your attention to the Woodland Trust’s neighbourhood planning microsite: https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/ which may give you further ideas for your plan.</p> <p>Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document and is intended for policy planners, such as community groups preparing Neighbourhood Plans. Our guide can be found at: https://www.woodlandtrust.org.uk/mediafile/100820409/planning-for-ancient-woodland-planners-manual-for-ancient-woodland-and-veterandtrees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff</p> <p>In addition other Woodland Trust research which may assist with taking your Neighbourhood Plan foreword is a policy and practice section on our website, which provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease: https://www.woodlandtrust.org.uk/publications/</p> <p>Our evidence base is always expanding through vigorous programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query. You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season: http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/</p> <p>If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this further with you. If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price – Planning Advisor 0343 7705767 victoriabankesprice@woodlandtrust.org.uk</p> <p>Best wishes and good luck with your plan</p>