

# GODALMING TOWN COUNCIL

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5 August 2016

I HEREBY SUMMON YOU to attend the **PLANNING & ENVIRONMENT COMMITTEE** Meeting to be held in the Council Chamber, Municipal Buildings, Bridge Street, Godalming on THURSDAY, 11 AUGUST 2016 at 7.00 pm.

Louise P Goodfellow  
Town Clerk

Committee Members: Councillor Bolton – Chairman  
Councillor Poulter – Vice Chairman

Councillor P Martin  
Councillor Cosser  
Councillor T Martin  
Councillor Reynolds  
Councillor Noyce  
Councillor Welland  
Councillor Pinches  
Councillor Walden  
Councillor Purkiss

Councillor Gordon-Smith  
Councillor Wheatley  
Councillor A Bott  
Councillor S Bott  
Councillor Thornton  
Councillor Williams  
Councillor Gray  
Councillor Young

## **AGENDA**

### 1. MINUTES

To approve as a correct record the minutes of the meeting of the Committee held on the 2016, a copy of which has been circulated previously.

### 2. APOLOGIES FOR ABSENCE

### 3. PETITIONS/STATEMENTS/QUESTIONS FROM MEMBERS OF THE PUBLIC

The Chairman to allow members of the public to ask the Council questions, make a statement or present a petition. This forum to be conducted in accordance with Standing Order 4.

### 4. DISCLOSABLE PECUNIARY INTERESTS AND NON-PECUNIARY INTERESTS

To receive from Members any declarations of interests in relation to any items included on the Agenda for this meeting required to be disclosed by the Localism Act 2011 and the Godalming Members' Code of Conduct.

The Comments and observations from the following Waverley Borough Councillors are preliminary ones prior to consideration at Borough Council level and are based on the evidence and representations to the Town Council.

Cllr P Martin  
Cllr T Martin  
Cllr Welland  
Cllr Thornton  
Cllr Bolton

Cllr RA Gordon-Smith  
Cllr Reynolds  
Cllr Wheatley  
Cllr Williams  
Cllr Hunter

Members of the Public have the right to attend all meetings of the Town Council and its Committees and are welcome.

5. PLANNING APPLICATIONS - CONSULTATION

To consider a schedule of planning application attached at Appendix A.

6. WAVERLEY BOROUGH COUNCIL – PLANNING DECISIONS

A list of Godalming applications considered by Waverley Borough Council (either by delegated authority or by the Area Planning Committee (Central)) where decisions were significantly different to the observations submitted by the Town Council is attached for the information of members.

7. UPDATE ON THE NEIGHBOURHOOD PLAN

Members to receive an update from the Chairman of the Neighbourhood Plan Ad Hoc Advisory Committee.

8. WAVERLEY BOROUGH COUNCIL'S DRAFT LOCAL PLAN

Members to receive a summary of points raised by them at the previous meeting of the Committee and to consider further how they might take this forward and arrive at a response to Waverley Borough Council's draft Local Plan (the summary to be circulated in advance of the meeting). There are two further meetings of this Committee before a response should be submitted to Waverley Borough Council.

A report from Chris Bowden from Navigus Planning circulated in advance of the last meeting is also appended to this agenda.

Waverley will publish its draft Local Plan on Friday 19 August and from that date it will be available to view and download on the Waverley website. The consultation period will be six weeks long and run from Friday 19 August to Monday 3 October. Individual Members, residents and interested parties will be able to send their representations to Waverley by either: logging onto: [www.consult.waverley.gov.uk](http://www.consult.waverley.gov.uk) ; emailing [planningpolicy@waverley.gov.uk](mailto:planningpolicy@waverley.gov.uk); or writing to: Planning Policy, Waverley Borough Council, The Burys, Godalming, GU7 1HR

Members received a hard copy of the Waverley draft Local Plan with the agenda for this Committee's meeting on 21 July 2016. It is also available from amongst Waverley's committee papers on the Waverley website - <https://modgov.waverley.gov.uk/mgAi.aspx?ID=7868#mgDocuments> ).

9. ITEMS FOR THE INFORMATION OF MEMBERS

Members are asked to note the items which are tabled for their information.

10. DATE OF NEXT MEETING

The next meeting of the Planning & Environment Committee is scheduled to take place on Thursday, 1 September 2016 at 7.00 pm in the Council Chamber.

11. ANNOUNCEMENTS

Brought forward by permission of the Chairman. Requests to be submitted prior to commencement of the meeting.

SCHEDULE OF PLANS SUBMITTED FOR  
COMMENTS OF GODALMING TOWN COUNCIL'S PLANNING & ENVIRONMENT COMMITTEE

| <u>APPLICATION</u> | <u>PROPOSED DEVELOPMENT<br/>&amp; NAME OF APPLICANT</u>  | <u>OBSERVATIONS</u> |
|--------------------|--|---------------------|
| 1. WA/2016/1346    | Listed Building Consent for the erection of security camera and internal alterations.<br>9 Deanery Place, Church Street, Godalming<br>Mr & Mrs M Greene  |                     |
| 2. WA/2016/1351    | Installation of air conditioning units.<br>65A High Street, Godalming<br>A Mansell – Specsavers Opticians  |                     |
| 3. WA/2016/1352    | Display of illuminated and non-illuminated signs.<br>65A High Street, Godalming<br>A Mansell – Specsavers Opticians                                      |                     |
| 4. WA/2016/1370    | Construction of a dormer window; alterations to allow use of garage as habitable accommodation.<br>3 Maplehatch Close, Godalming<br>V Street             |                     |
| 5. WA/2016/1388    | Erection of extension and alterations.<br>7 Richmond Road, Godalming<br>P McFarlane  |                     |
| 6. WA/2016/1390    | Erection of garden studio.<br>98 Combe Road, Godalming<br>D Hodge  |                     |
| 7. WA/2016/1402    | Erection of a link extension together with alterations to existing garage to provide habitable accommodation.<br>27 Twycross Road, Godalming<br>D Wood   |                     |
| 8. WA/2016/1411    | Erection of building to provide offices (Use Class B1) and associated parking.<br>Land at Innovation House, Douglas Drive, Godalming<br>Mr & Mrs Elsmore |                     |

## GODALMING TOWN COUNCIL

| <u>APPLICATION</u> | <u>PROPOSED DEVELOPMENT &amp;<br/>NAME OF APPLICANT</u>   | <u>OBSERVATIONS</u> |
|--------------------|---|---------------------|
| 9. WA/2016/1418    | Outline application for the erection of up to 100 dwellings, including 25 affordable, together with associated amenity/play space; the erection of a 574sq.m building to provide a community use (Use Class D1) at ground floor level with office (Use Class B1) above following demolition of existing buildings except the ambulance station together with associated works (revision of WA/2016/0101).<br>Woodside Park, Catteshall lane,<br>Godalming<br>R Trendle – Woodside Park Properties Ltd |                     |
| 10.WA/2016/1419    | Change of use of land ancillary to existing commercial park to open space.<br>Woodside Park, Catteshall Lane,<br>Godalming<br>R Trendle – Woodside Park Properties Ltd  |                     |
| 11.WA/2016/1436    | Erection of roof extension and alterations to provide a two storey dwelling.<br>The Firs, Hambledon Road,<br>Godalming<br>Mr & Mrs Smith  |                     |
| 12.WA/2016/1443    | Application under Section 73A to vary/remove Condition 20 of WA/2013/0223 (approved plans) to allow changes to elevations.<br>The Old Mill, Mill Lane, Godalming<br>G Barnett   |                     |
| 13.WA/2016/1445    | Erection of rear extensions and alterations.<br>151 Peperharow Road, Godalming<br>Mr & Mrs Neal   |                     |
| 14.WA/2016/1448    | Application under Section 73 to remove Condition 1 of WA/2014/1715 to allow for illumination of sign.<br>Charterhouse School, Hurtmore Road,<br>Godalming<br>Charterhouse School  |                     |

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| <u>APPLICATION</u> | <u>PROPOSED DEVELOPMENT &amp;<br/>NAME OF APPLICANT</u>  | <u>OBSERVATIONS</u> |
|--------------------|--|---------------------|
| 15. WA/2016/1453   | Erection of extensions including a porch and alterations to roofspace to provide habitable accommodation to No. 8; erection of a porch to No. 10. 8 & 10 Summers Road, Godalming<br>Mr & Mrs Todrick & Ms Watson |                     |
| 16. WA/2016/1457   | Change of use of outbuilding to music teaching studio and alterations.<br>61 Meadow, Godalming<br>L Newman   |                     |
| 17. WA/2016/1468   | Erection of single storey rear and side extension.<br>18 Ormonde Road, Godalming<br>S Yeo  |                     |
| 18. WA/2016/1484   | Erection of extensions and alterations following demolition of existing garage.<br>17 Duncombe Road, Godalming.<br>Mr & Mrs Warlow   |                     |
| 19. WA/2016/1486   | Installation of extractor flues to Science Block and C Block.<br>Charterhouse School, Charterhouse Road, Godalming.<br>Charterhouse School   |                     |
| 20. WA/2016/1487   | Listed Building Consent for the installation of extractor flues to Science Block and C Block.<br>Charterhouse School, Charterhouse Road, Godalming.<br>Charterhouse School                                       |                     |
| 21. WA/2016/1489   | Erection of extensions.<br>21 Long Gore, Farncombe.<br>S Snelling  |                     |
| 22. WA/2016/1497   | Erection of 3 dwellings following demolition of existing building and associated works and parking.<br>110 Ockford Road, Godalming.<br>A Hussain   |                     |
| 23. WA/2016/1502   | Installation of ventilation ducting and flue (revision of WA/2015/2099 follows invalid application WA/2016/0734).<br>139 High Street, Godalming.<br>M Cabbaroglu   |                     |

## GODALMING TOWN COUNCIL

| <u>APPLICATION</u> | <u>PROPOSED DEVELOPMENT &amp;<br/>NAME OF APPLICANT</u>   | <u>OBSERVATIONS</u> |
|--------------------|---|---------------------|
| 24. WA/2016/1504   | Erection of extensions and alterations, including dormer windows following demolition of existing garage.<br>Clifford House, Charterhouse Road,<br>Godalming.<br>R Harpham      |                     |
| 25. TM/2016/0105   | Application for works to a tree subject of Tree Preservation Order 10/03.<br>51 High Street, Godalming<br>Mr Anil Patel   |                     |
| 26. TM/2016/0107   | Application for works to trees subject of Tree Preservation Order TPO<br>Woodland 07/07.<br>11 Woodmancourt, Godalming<br>Mrs Fleming   |                     |
| 27. TM/2016/0108   | Application for works to trees subject of Tree Preservation Order 21/07.<br>Tree Tops, The Close, Godalming<br>Mr Bajer   |                     |
| 28. TM/2016/0109   | Application for works to tree subject of Tree Preservation Order 10/06.<br>17 Shackstead Lane, Godalming<br>Ms Diana Forbes   |                     |
| 29. TM/2016/0112   | Application for works to trees subject of Tree Preservation Order 26/02.<br>24 Lammas Road, Godalming<br>Mrs Sarah Morris   |                     |
| 30. CA/2016/0092   | Godalming Centre Conservation Area – works to and removal of trees.<br>Ladymere Place, Ockford Road,<br>Godalming<br>Grillo LLP Chartered Surveyors                             |                     |
| 31. NMA/2016/0130  | Amendment to WA/2015/1853 for alterations to internal layout and addition of tile hanging to Plot 1 front elevation.<br>134 Quintus, Busbridge Lane,<br>Godalming<br>J Richards |                     |

GODALMING TOWN COUNCIL

| <u>APPLICATION</u> | <u>PROPOSED DEVELOPMENT &amp;<br/>NAME OF APPLICANT</u>   | <u>OBSERVATIONS</u> |
|--------------------|---|---------------------|
| 32. CR/2016/0012   | Prior Notification Application - Change of use from Class B1a (office) to Class C3 (residential) use to provide 11 dwellings.<br>Units C, D & E, Catteshall Mill, 5<br>Catteshall Road Godalming.<br>D Moore            |                     |
| 33. CR/2016/0013   | Prior Notification Application - Change of use from Class B1a (office) to Class C3 (residential) use to provide 35 dwellings.<br>Thornbrook House, Weyside Park,<br>Catteshall Lane, Godalming.<br>Thornbrook House Ltd |                     |

## WAVERLEY BOROUGH COUNCIL – PLANNING DECISIONS

Godalming applications considered by Waverley Borough Council where decisions were significantly different to the observations submitted by the Town Council.

| <u>Plan Ref.</u> | <u>Description</u>   | <u>Town Council Observations</u>   | <u>Waverley Decisions</u> |
|------------------|--|--|---------------------------|
| WA/2016/0062     | Certificate of lawfulness under Section 191 for an existing use of the site as shop (use Class A1).<br>The Godalming Arms, 1 Meadow, Godalming<br>I Smith – Tesco Stores Ltd           | Application noted  | Refused                   |
| WA/2016/0550     | Erection of third and fourth floor extensions to an existing building to provide 4 additional apartments and to extend an apartment.<br>Thornbrook, Weyside Park, Godalming<br>K White | Object on the grounds that the proposal is over development, over bearing and detrimental to the street scene.   | Full permission           |
| WA/2016/0746     | Alterations to existing outbuilding to provide ancillary accommodation.<br>10 Green Lane, Godalming<br>H Dodge   | Object on the grounds of overdevelopment and the creation of a unit capable of separate occupation.<br>The Ward Councillor will be asked to call this in to the relevant planning meeting of Waverley Borough Council. | Full permission           |
| WA/2016/0992     | Erection of a detached dwelling.<br>Land at Fairhill, Charterhouse Road, Godalming<br>IBRID S.L.   | No objection   | Refused                   |
| WA/2016/0991     | Erection of detached outbuilding.<br>61 Silo Road, Farncombe<br>K Gray   | Object on grounds of overdevelopment.  | Full permission           |
| WA/2016/0965     | Erection of 2 residential dwellings.<br>Land to the rear of 34-36 High Street, Godalming<br>S Morar  | No objection   | Refused                   |

|              |  |              |         |
|--------------|--|--------------|---------|
| WA/2016/1008 | Alterations to elevations to allow additional habitable accommodation.<br>8 Alvernia Close, Godalming<br>A Clark | No objection | Refused |
| WA/2016/1115 | Erection of extensions.<br>187 Ockford Ridge, Godalming<br>Mr & Mrs Hampshire                                    | No objection | Refused |

## **GODALMING TOWN COUNCIL**

### **Summary Note on Waverley Borough Draft Local Plan: Part One**

**21<sup>st</sup> July 2016**

#### **1.0 Introduction**

1.1 This note provides a summary of issues in respect of the main policies in the Waverley Borough Draft Local Plan: Part One document (hereafter known as the 'Draft Local Plan' or 'DLP'). It identifies issues that Godalming Town Council (GTC) may wish to consider in any representations it makes to the consultation on the DLP.

#### **2.0 General**

2.1 In general there are few surprises in the DLP. Compared to the withdrawn Draft Local Plan 2014, there are no major differences; the obvious exception being the inclusion of the Dunsfold Strategic Site. The DLP was clearly going to be required to examine the potential for green belt releases, including around Godalming and Farncombe; whilst Central Government is firmly against significant rolling back of green belt boundaries, national planning policy and the recent experience of other local plans at Examination in Public has been that the removal of some land from the green belt is expected in order that objectively assessed housing needs are to be met.

2.2 The main thing that has changed since the Draft Local Plan 2014 is that Godalming and Farncombe is now preparing a Neighbourhood Plan (NP) and there is a crossover between several matters that the two plans are looking to address. It will be important that GTC, as the responsible body for the NP, makes very clear what it considers to be the 'local matters' that are for the NP to deal with as opposed to the DLP.

#### **3.0 Local Plan Objectives**

3.1 The DLP identifies a series of objectives on page 4. Of these, the ones of particular importance to Godalming and Farncombe are:

- Development of Dunsfold 'subject to appropriate infrastructure and mitigation'.
- Promoting sustainable transport including public transport and improved facilities for pedestrians and cyclists.
- Maintain and protect all those areas of the green belt that fulfil the purposes of the designation.
- Ensure adequate provision for social, physical and green infrastructure to meet the needs of the increased population.

- Increase the stock of affordable housing and ensure that this meets local needs in terms of type and tenure.
- Deliver a range of sizes and types of new homes to meet needs, particularly of older people and first-time buyers.
- Safeguard existing employment accommodation and deliver new commercial premises, particularly offices/R&D and space to meet the needs of small and medium-sized enterprises (SMEs).

3.2 These objectives should generally be supported although, as the commentary below makes clear, there are some concerns about how this can practically be achieved in Godalming and Farncombe. At this point it should be noted that the DLP, being a Part One plan, is only expected to cover strategic matters, with the later Part Two plan addressing more of the detail about how these things will happen. However, there are a number of matters where more detail is needed at this stage to provide certainty that the plan can be delivered and the objectives achieved.

#### **4.0 Spatial Strategy**

4.1 Policy SP2 (Spatial Strategy) states that 'non-strategic sites will be identified and allocated through Local Plan Part 2 and Neighbourhood Development Plans'. This principle is supported although clarity is required as to how Waverley Borough Council (WBC) is defining a strategic site. It is instructive that it allocates as a strategic site around 100 dwellings at Woodside Park in Godalming (Policy SS8), however a simple number of dwellings may not be the only criterion they are using. Clarity should be sought.

#### **5.0 Green Belt boundaries**

5.1 The DLP recommends the removal of two pieces of land from the green belt around Godalming – at land south-east of Binscombe and land between Aaron's Hill and Halfway Lane.

5.2 In order to justify the removal of green belt land, it must be demonstrated that it no longer fulfils all the five objectives of the green belt:

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

- 5.3 This is the sole way that any contrary view can be argued. It is observed that there is a strong technical evidence base behind the WBC position.
- 5.4 What must be balanced is the issue of green belt release versus the need to meet the housing requirements in the DLP and the significant need for affordable housing. With regard to the latter point, there is a need for larger sites to ensure that affordable housing is delivered on site (there is a more detailed discussion of this issue in Section 8.0). Godalming and Farncombe is very constrained in terms of potential sites for housing but it is proposed that the NP undertakes a Call for Sites to understand that latest position. If the commitment is to deliver housing in Godalming and Farncombe, then difficult choices need to be made.
- 5.5 At this point it is worth noting that the NP cannot actually remove sites it allocates from the green belt. Rather, it recommends they are deleted from green belt and it is the Local Plan that actually does this. Therefore, in terms of options for removing sites from the green belt, this is largely dictated by the DLP.
- 5.6 In respect of the areas of land that are proposed for removal from the green belt (and therefore, de facto, available as housing sites), there is an issue for the Aaron's Hill/Halfway Lane land in respect of the lack of a defensible boundary, e.g. a road, river or other physical boundary. It is recommended that GTC pushes for more certainty, particularly given the need for the NP to bring this site, if allocated for development, together as part of coherent strategy for Godalming and Farncombe.

## **6.0 Strategic Sites - Dunsfold**

- 6.1 The principal concern with the Dunsfold policy is the lack of certainty that a proper and full evidence base has been assembled which demonstrates that this scale of development can be delivered along the supporting infrastructure and in a way that does not have significant adverse impacts on neighbouring areas including Godalming and Farncombe. Reference is made in paragraph 5.22 of the DLP to 'more needing to be done' in respect of appropriate mitigation on the highway network'. This is a concern and one of the reasons is that, if additional mitigation is required, this increases the cost which will inevitably decrease the resources that will be focused on more sustainable modes of transport such as cycling and on public transport. Paragraph 5.22 goes on to state that, 'Development of the site is subject to these matters being resolved satisfactorily through the relevant planning applications.' This is of considerable concern; such matters for a site of this scale and complexity should be dealt with through a comprehensive development brief and/or masterplan.

6.2 The NP Group concurs with this view and has stated that, through the work it has done on issues as they relate to Godalming and Farncombe, the Dunsfold site needs to be bigger. Their view is that 2,600 dwellings is possibly the worst size because it is not big enough to deliver better transport links but is big enough to have an adverse impact on Godalming and Farncombe. Whilst the NP can become a significant bidding document in seeking to secure developer contributions from the Dunsfold site for infrastructure improvements such as expanded car parking at Godalming Station, it is likely that available funds will be limited. This would be less likely to be the case with a larger site. It is recommended that GTC pushes WBC and the DLP to provide more clarity on the viability of development and how this relates to (i) what infrastructure is *needed* to ensure a sustainable development; and (ii) what infrastructure can be *delivered* by the development. In particular, where Policy SS7 (New settlement at Dunsfold Aerodrome) requires 'a package of sustainable transport measures', GTC should press for more certainty as to what package is needed, with the supporting evidence provided to justify this position.

6.3 On a similar theme, the requirement in Policy SS7 for a 26,000m<sup>2</sup> business park means that linkages to Godalming and Farncombe will be key. This is particularly the case given the declining employment base in the town. Again, the particular concern is that there will be no available funding to provide improvements to public transport and cycling.

## **7.0 Strategic Sites – Woodside Park**

7.1 The inclusion of this site is rather surprising given the lack of previous dialogue on it. As was noted earlier in Section 4.0, what is not evident is why it is considered to be a strategic site. Whilst the DLP does not provide a definition of a strategic site, one that has been used in the wider planning sector is a site that is 'important to delivering the strategic objectives of the plan'. Apart from delivering housing to meet the objectively assessed need, there is little else that this site evidently does. Indeed, the loss of employment floorspace will actively be detrimental to achieving the objective of expanding the business base, both generally and in Godalming and Farncombe in particular.

7.2 It is recommended that GTC presses WBC for clearer justification as to the strategic role of this site.

## **8.0 Affordable housing**

8.1 It is important to be clear that when the term 'affordable housing' is used it concerns the planning definition rather than the commonly considered view that it means 'affordable to buy'. However, this has been somewhat clouded by recent Housing and Planning Act which has brought Starter Homes under the planning definition of affordable housing. Starter

Homes are dwellings built for sale to people under the age of 40 and at up to 80% of market value. On sites of 10 dwellings or more it is expected that at least 20% of all dwellings should be delivered as Starter Homes, although this is yet to be confirmed in Regulations. However, given that the overall affordable housing requirement sought by WBC in the DLP is 40%, then this effectively means that at least half of this could be in the form of Starter Homes. The total absence of any reference to Starter Homes in the DLP would suggest that little thought has been given to the impact of these new provisions in the Housing and Planning Act; whilst this is perhaps to be expected given how recently it was enacted, it may result in challenges to the affordable housing policies in the DLP from the development industry (although at this stage, one can only speculate about the likelihood of this).

8.2 Policy AHN1 (Affordable Housing on Development Sites) provides the opportunity for development sites identified in Neighbourhood Plans to vary the requirement in the policy for 40% affordable housing. However, the reality is that the evidence required to justify an alternative requirement – and certainly a higher requirement – will be very difficult to assemble.

8.3 Policy AHN1 goes on to state that on small sites on 10 dwellings or less, affordable housing will be sought as commuted sums which will be used to deliver affordable housing off-site. Whilst this is a standard approach, this could have implications for Godalming and Farncombe. If a lot of the development in the town is on small sites as is likely, then it will not see the provision of affordable housing that is needed because the commuted sums will be used by WBC on sites it has elsewhere that can deliver affordable housing. So the key to addressing affordable housing needs in Godalming is the allocation of sites that are clearly larger than 10 dwellings (sites allocated for, say, 12 dwellings will often see applications coming in just below the 10-dwelling threshold). It is recommended that GTC states that it would wish to see commuted sums for affordable housing focused on Godalming and Farncombe as one of the main settlements in Waverley. Whether this is on sites owned by WBC or registered housing providers, or by supplementing provision on larger allocated sites, will depend on circumstances as applications come forward.

## **9.0 Housing type and size**

9.1 Policy AHN3 (Housing Types and Size) reflects the findings of the West Surrey Strategic Housing Market Assessment (SHMA) in requiring specific needs to be addressed for older people, families with children and people with disabilities. GTC, based on the evidence being collected by the NP Housing Group, will form a view as to whether this picture is the same in Godalming but this summary in the policy is overly general. In particular, 'families

with children' could be seeking dwellings from anywhere between 2- and 5-beds. More specific requirements linked to the size of dwellings (by number of bedrooms) would be more helpful.

- 9.2 As with Policy AHN1 (Affordable Housing), Policy AHN3 would benefit from stating that Neighbourhood Plans should be able to identify alternative mixes in local areas where there is the appropriate evidence.

## **10.0 Sustainable Transport**

- 10.1 Paragraph 7.9 of the DLP makes reference to the Waverley Cycling Plan Supplementary Planning Document (SPD) 2005 which identified a number of preferred cycle routes. Whilst the proposed update to this list should be welcomed, the DLP should provide clearer policy support for these routes and signpost the fact that Neighbourhood Plans could identify additional routes. The fact that the SPD is from 2005 and there has been little progress made in developing quality cycle routes in Godalming and Farncombe demonstrates that there needs to be a stronger commitment to achieving this. The focus for transport in the NP is on cycling and walking and, with the inevitable increase in traffic from Dunsfold as well as growth in Godalming and Farncombe, credible alternatives to the private car need to be provided.
- 10.2 Paragraph 7.10 of the DLP notes that measures to tackle traffic growth and address congestion hotspots and improve travel options and accessibility will be addressed through the Surrey Local Transport Plan and '...where appropriate, will be reflected in the Local Plan Part 2: Non-Strategic Policies and Sites.' It is vital that Neighbourhood Plans are also added to this because, as Policy SP2 (Spatial Strategy) notes, Neighbourhood Plans are one of the main ways that new development will be allocated. A coherent approach to such allocations should ensure that sustainable movement is addressed as well as part of the same plan. Similarly, in paragraph 7.25, commitment is made by WBC to work with Surrey County Council on improving the existing network of pedestrian and cycle routes; this should also include town and parish councils and Neighbourhood Plan groups.
- 10.3 Generally therefore, Policy ST1 (Sustainable Transport) needs to make more explicit reference to the role that Neighbourhood Plans and town and parish councils should play in improving non-vehicular movement in particular. This could include particular reference in the first sentence as to who 'key stakeholders' include, i.e. town and parish councils and Neighbourhood Plan groups.

## **11.0 Infrastructure**

- 11.1 There is a concern, looking at the infrastructure evidence base, that the assertion in paragraph 6.13 of the DLP that, 'The Infrastructure Delivery Plan supports the development strategy and identifies the infrastructure improvements required to support additional housing', cannot be justified. The 2014 WBC Infrastructure Update has large gaps where it states that responses are still awaited to the April 2014 consultation. Given that it is now July 2016 this is unacceptable and is particularly concerning when there are gaps in respect of fundamental matters such as education and rail capacity. This should be raised as a matter of concern particularly as it is intrinsically linked so matter such as the delivery of the Dunsfold strategic site.
- 11.2 Policy ICS1 (Infrastructure and Community Facilities) should be supported but it is recommended that the words "...or Neighbourhood Plans..." are inserted at the end of the first sentence of paragraph 4, i.e. it should read, "The Council will support the development of new services and facilities where required and may safeguard land for infrastructure if identified through the Infrastructure Delivery Plan or Neighbourhood Plans."

## **12.0 Employment and the Economy**

- 12.1 The DLP notes at paragraph 10.20 that the Borough has lost a significant number of employment premises since the amendment to permitted development rights to allow conversion of such premises to residential use. This is not something that the DLP can necessarily counter but this issue is particularly pertinent to Godalming and Farncombe and is expected to continue. It will not only erode the employment base but result in further windfall housing development.
- 12.2 Despite this, paragraph 10.28 states that employment development will be focused in the main settlements including Godalming and Farncombe. It is currently unclear where this development would be located, therefore it is rather disingenuous for the DLP to make this statement.
- 12.3 Having said this, Policy EE2 (Protecting Existing Employment Sites) merits general support for its intention to protect, as far as it can, the existing employment base in the borough.

## **13.0 Town Centres and Shopping**

- 13.1 There is little of fundamental importance in this section other than to note at paragraph 11.23 that the DLP makes explicit reference to the Godalming and Farncombe NP which 'may contain additional policies for its town centre'. However, as the analysis in this section of the DLP articulates, any scope for significant change and improvement in the retail offer

in Godalming town centre is very limited. Overall it is recommended that Policy TCS1 (Town Centres) is supported.

#### **14.0 Leisure, Recreation and Sport**

- 14.1 Paragraph 12.13 states that 'detailed criteria for designating Local Green Spaces through local and neighbourhood plans will be provided as part of the Local Plan Part 2.' A Local Green Space designation affords the same level of protection as green belt. Whilst guidance on the criteria for being able to designated Local Green Spaces is generally helpful, this is already provided in the National Planning Policy Framework and Planning Practice Guidance. To suggest that any criteria as interpreted by WBC should be enshrined in policy is of concern. This should be objected to strongly.
- 14.2 Paragraph 12.11 notes that Godalming is one of the places in Waverley borough that have a below-average level of equipped play provision and informal play space. This should be noted and picked up through the emerging NP, both generally and through site allocations.
- 14.3 Policy LRC1 (Leisure, Recreation and Cultural Facilities) states that the loss of existing facilities is acceptable subject to a series of criteria. One of these relates to alternative provision and ensuring this is of a suitable scale and type. It is recommended that added to this is the requirement for any re-provision 'to be in a location that is accessible to the community it serves'.

#### **15.0 Landscape Character**

- 15.1 Policy RE3 (Landscape Character) retains, in principle, protection of the Godalming Hillsides, with a review of the boundary to be included in the Local Plan Part 2. GTC should seek early warning if the boundary is likely to change. However, this is unlikely to happen to any significant degree.

## GODALMING TOWN COUNCIL

Disclosure by a Member<sup>1</sup> of a disclosable pecuniary interest or a non-pecuniary interest in a matter under consideration at a meeting (S.31 (4) Localism Act 2011 and the adopted Godalming Members' Code of Conduct).

As required by the Localism Act 2011 and the adopted Godalming Members' Code of Conduct, **I HEREBY DISCLOSE**, for the information of the authority that I have [a disclosable pecuniary interest]<sup>2</sup> [a non-pecuniary interest]<sup>3</sup> in the following matter:-

**COMMITTEE:**

**DATE:**

**NAME OF COUNCILLOR:** \_\_\_\_\_

Please use the form below to state in which agenda items you have an interest.

| Agenda No. | Subject | Disclosable Pecuniary Interest | Non-Pecuniary Interest | Reason |
|------------|---------|--------------------------------|------------------------|--------|
|            |         |                                |                        |        |
|            |         |                                |                        |        |
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|            |         |                                |                        |        |

**Signed** \_\_\_\_\_

**Dated** \_\_\_\_\_

<sup>1</sup> "Member" includes co-opted member, member of a committee, joint committee or sub-committee

<sup>2</sup> A disclosable pecuniary interest is defined by the Relevant Authorities (Disclosable Pecuniary Interests) regulations 2012/1464 and relate to employment, office, trade, profession or vocation, sponsorship, contracts, beneficial interests in land, licences to occupy land, corporate tenancies and securities

<sup>3</sup> A non-pecuniary interest is defined by Section 5 (4) of the Godalming Members' Code of Conduct.