

**Godalming and Farncombe Neighbourhood Plan version 3.3 – Regulation 14 Consultation Representations, Response and Suggested Actions (12 July 2018)**

	<b>Representation, Comment and Issues Raised</b>	<b>Response</b>	<b>Suggested Actions.</b>
1	Environment Agency – Declined to comment		No action required
2	Highways England – Reviewed and have no comment at this time		No action required
3	Southern Water – No Comment – does not operate in NP area.		No action required
4	<p>Resident: Grounds for strengthening case for skateboard park in Farncombe citing para 9.9 relating to deprivation and crime rates and need for improved facilities for teenagers (para 9.15, 9.16, 9.24).</p> <p>Cites Farnham as excellent example of skateboard park for teenagers.</p> <p>Questions ambiguous language in para 9.25 (“it is recognised....” and asks by whom) Challenges assertion that “needs of youths may change over time” and evidences that Farnham skateboard park is in constant use with a steady stream of younger generations coming forward to enjoy the facility.</p> <p>Wishes that the NP be reworded to show greater positivity so that a facility can be provided.</p>	<p>It is suggested that wording of para 9.25 be strengthened to support the provision of centrally located youth facilities such as a skateboard park in Farncombe. This provided a greater positivity, a project such as this could also be identified as a CIL project</p>	<p>amend to Para 9.25 to read:</p> <p><i>Godalming has two skateboard parks – a large skateboard park in Aaron’s Hill and the smaller facility by the Wilfrid Noyce Centre in central Godalming. Generally, there is strong support for centrally-located youth facilities such as a new skateboard park located within the Farncombe locality..</i></p>
5	National Grid – No records of relevant National Grid Assets in NP area		No action required
6	<p>Resident: Email relating to issues dealt with by the Local Plan Part 1 – removal of land in Green Belt and objections to potential development</p>	<p>This comment relating to the potential for the development of ‘@Eashing Park’ is not a comment on the Neighbourhood Plan as it is regarding a specific development proposal. However, the draft proposal as presented at the public meeting is in keeping with NP Policy GOD 1 in as much as the proposed scheme provides for the development to be at least 50% two and three bedroom dwellings</p>	No action required
7	<p>Surrey Wildlife Trust &amp; Surrey Nature Partnership</p> <p>Welcome overall NP objectives for the environment (para 3.3)</p> <p>Welcome and commend Chapter 8 – especially GOD12 Green Corridors policy – suggests NP might wish to refer to the area’s several designated Sites of nature Conservation Importance (SNCI’s) which have effectively been incorporated into the Green Corridors.</p> <p>Para 81. Suggested emphasis on the fact that some flora and fauna is not found elsewhere in Surrey.</p> <p>Welcome policies GOD 14 – Water Recycling</p>	<p>Whilst Surrey Wildlife Trust suggests that the NP might wish to add a list of Sites of Nature Conservation Importance (SNCI’s) it is not felt that the lack of such a list distracts from the overall emphasis of the environmental aims indicated within the NP. Paragraph 8.14 notes the importance point that the green corridors link the Ancient Woodland and Sites of Special Scientific Interest (SSSI’s) within the neighbourhood plan area together.</p> <p>Suggest amend to para 8.1 that highlights that some of the local flora and fauna is found nowhere else in Surrey.</p>	<p>amend to Para 8.1 to read:</p> <p><i>A home to live in is clearly the first and most vital consideration for everyone. Beyond this, most people wish their home to be set within an attractive and healthy environment. ‘Green space’ is not just good to look at. It provides room for outdoor leisure. Plants and trees contribute to air and water quality and we have a duty to manage our environment for the benefit of the flora and fauna that we share it with, some of which is found nowhere else in Surrey. A good environment helps to keep us healthy, both physically and mentally.</i></p>

	<p>Welcomes GOD 15 healthy Air, especially para GOD 15: D. – benefits of appropriate tree planting.</p> <p>Non-land Use issues (Table 10.1) welcomes and supports ‘possible actions’ that directly serve to further protect, enhance or restore wildlife.</p>		
8	<p>Resident: Email relating to issues dealt with by the Local Plan Part 1 – removal of land in Green Belt and objections to potential development</p>	See item 6	No action required
9	<p>Waverley Borough Council</p> <p>WBC believe draft 3.3 an improvement of earlier versions and that WBC feedback addressed in a number of areas.</p> <p>WBC retains concerns on certain aspects:</p>	WBC Comments and assistance are much appreciated.	
	<p>WBC Key Issue 1. Policy Maps do not show changes made to Green Belt when LLP1 was adopted in Feb 2018 (removal of land at Aarons Hill and Binscombe)</p>	Update Policy maps to show changes made to the Green Belt since adoption of WBC LLPP1	Update Policy Maps
	<p>WBC Key Issue 2. The NP wished WBC to review the Town Centre retail boundaries and Godalming Hillside Policy through the Local Plan Part 2, with their support. WBC have undertaken these reviews and WBC proposals are set out in the Local Plan part 2 preferred options consultation document. WBC concerned about inclusion in the NP both through polices and on Policies Maps and are unsure whether the intention is to replicate or replace what is in the Local Plan.</p>	<p>WBC LLPP2 is due for submission in Feb 2019 with anticipated adoption in late 2019, with the Godalming and Farncombe neighbourhood plan aiming for submission in mid-2018 and adoption by referendum in May 2019. As such care does need to be taken to avoid conflicts between LLP policies and NP policies which could result due to the lead and lag of the two processes.</p> <p>-----</p> <p>God 13 Godalming and Farncombe Skyline is not intended to either replicate or replace the Godalming Hillside Policy outlined in the LLP2 preferred options documents which will encompass <b>Policy BE5 Godalming Hillside and Policy BE2 Frith Hill Area of Special Environmental Quality into a single policy Local Plan Policy RE3 Landscape Character (section v. Godalming Hillside).</b></p> <p>As stated in 8.20 the protection of the Godalming Hillside is important to the community and therefore the retention of the policy in the Local Plan is strongly supported and that it is not necessary for the GofarNP to provide a policy covering this matter. However the GofarNP recognises that the existing and preferred options policy only addresses the wooded appearance of the area. “Development will not be acceptable on the Godalming Hillside unless the Council is satisfied that the development would not: • diminish the wooded appearance of the hillside; and result in a loss of tree cover to the detriment of the</p>	<p>Para 8.19 amend paragraph to read:</p> <p><i>The Godalming Hillside have been identified and specifically protected by Waverley Local Plan policy. The Wey Valley runs through the heart of the town and the valley sides, rising steeply on either side, are prominent and highly visible across the town. Waverley Local Plan Part 1, Policy RE3 retained policy BE5 from the Local Plan 2002 and recognises this and makes clear that development here will not be acceptable unless it would not diminish the wooded appearance of the hillside and result in a loss of tree cover to the detriment of the area and the character and setting of the town. Local Plan Part 1 Policy RE3 retains the policy with the boundaries reviewed as part of the development of the Local Plan Part 2.</i></p> <p>-----</p> <p>GOD13: Godalming and Farncombe Skyline;</p> <p>Amend wording to read:</p> <p><i>In addition to the requirements of Waverley Local Plan Policy RE3 (Landscape Character, section v. Godalming Hillside) which provides protection for Godalming’s tree-lined hillside and recognises their importance to the character and setting of Godalming and Farncombe, development is expected to preserve the profile of the skyline and ensure that any new buildings along the skyline are not unduly prominent.”</i></p>

		<p><i>area and the character of the setting of the town” (Policy RE3 Landscape Character (section v. Godalming HillSides)</i></p> <p>The purpose of God 13 is to enhance Policy RE3 and provide additional protection to the skyline of the hillside. When considering the general comment from the woodland trust (response 10) <i>“We are pleased to see that the Neighbourhood Plan for Godalming and Farncombe does identify the need to conserve and enhance its landscape, and how any new development in your Parish needs to respect its distinctive landscape character”</i> and the response from the Frith Hill Area Residents Association (response 12) which supports the protection of the wooded hillsides of the town but questions the wording of GOD 13, it is felt that it is right for the GofarNP to express a view on the protection of the hillsides.</p> <p>Discussions with WBC planning raised a number of issues regarding the ability to enforce a ‘subjective’ policy, which both the existing last sentence of GOD13 and the amended wording offered by the Frith Hill Area Residents Association would impose. Policy DM2 ‘Quality Places through Design’ of the LPP2 provides that: <i>“All new development will be expected to be of a high quality design. Development should respond effectively to its surroundings, reinforcing local distinctiveness and landscape and townscape character”</i>. The policy then provides supporting criteria.</p> <p>The NP should enhance existing policy and avoid providing conflict and doubt that would provide the opportunity for planning decisions to be challenged. As such in reviewing para 8.19 and 8.20 and Policy GOD 13 it is suggested that the wording of Policy GOD 13 is amended as shown.</p>	
	<p>WBC Key Issue 3. NP para 2.34 not clear on the number of dwellings identified in LLP1 that remain to be identified in LLP2.</p>	<p>The NP attempted to indicate that of the 352 dwellings required, 100 had already been allocated to a site. However, this appears to have caused confusion, therefore it is suggested the wording is amended to the basic LLP1 statement.</p>	<p>Amend para 2.34 to read <i>“The Local Plan identifies that a further 352 dwellings are to be allocated in the Local Plan Part Two, which is being prepared and is planned to be adopted in 2019”</i></p>
	<p>WBC Key Issue 4. WBC have concerns relating to GOD15: Healthy Air, particularly Part C.</p> <p>WBC Comment: The plan cannot require developments to meet more stringent standards than those set out in EU or UK environmental standards. It cannot require development to be less polluting than the existing development that it will replace.</p> <p>-----</p> <p>New development on greenfield sites would also not be able to be ‘air quality positive’ if there is no existing development on the site.</p> <p>WBC provided a link to the Government’s Planning practice Guidance on air quality. <a href="https://www.gov.uk/guidance/air-quality--3">https://www.gov.uk/guidance/air-quality--3</a></p>	<p>An important point to note is that the Godalming and Farncombe Neighbourhood Plan Policy God 15 – Healthy Air, is based on the Knightsbridge Neighbourhood Plan policy on healthy air which has just passed Examination. It was drafted by the lead from Clean Air for London with the help of leading environmental lawyers. It is part of the evidence being used for a new Clean Air Act which was presented in the House of Lords week beginning 2 July 2018.</p> <p>As such there is Neighbour Planning precedence behind this policy –</p> <p>During passage through examination the policy has been amended to drop references to air emission screening and in acknowledgement that Godalming is a different environment than Knightsbridge, further slight amendments have been made to address some of the concerns raised by WBC, without altering the basis for this policy within the Godalming and Farncombe Neighbourhood Plan. Further comment is shown below.</p> <p>-----</p> <p>The NP does not require more stringent standards, but it does require that whilst EU standards remain applicable that the more stringent of EU or UK standards are applied.</p>	<p><i>Policy God 15 redrafted to read:</i></p> <p><b>POLICY GOD15: HEALTHY AIR</b></p> <p>A. <i>Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Any proposal that results in a significant increase in air pollution will only be justified in exceptional circumstances.</i></p> <p>B. <i>Development should comply at least with all minimum EU or UK environmental requirements in relation to air pollutants whichever is the more stringent.</i></p> <p>C. <i>All development is encouraged to be at least ‘air quality neutral’ and should not cause or contribute to worsening air quality. On major development (as defined by the Town and Country Planning (Development Management Procedure) Order (England) 2010 [(Wales) 2012] this may most appropriately be demonstrated through an air quality assessment, and if necessary, proposed mitigation measures.</i></p>

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<p>WBC point 1 - Introduction Reference to LLP2 in para 1.1 incorrect.</p> <p>-----</p> <p>Reference to make up of Local plan in para 1.8 incorrect.</p>	<p>amend para 1.1 to correct reference.</p> <p>-----</p> <p>amend para 1.8 to correct reference</p>	<p>Introduction: Amend para 1.1, 4<sup>th</sup> sentence to read: <i>“In addition, Waverley Borough Council is preparing a local Plan part 2: Site Allocations and Development management policies”.</i></p> <p>-----</p> <p>Amend para 1.8 to read: <i>“The Local Plan for Waverley Borough consists of the Local Plan Part 1 (2018) and the retained policies from the 2002 Local Plan’</i></p>	
<p>WBC point 2 – Local Context Welcome addressing of previous feedback at para 2.2</p>			
<p>WBC point 3 – Vision &amp; Objectives Second objective under Community &amp; Infrastructure not addressed or evidenced through any policies in the plan.</p>	<p>Para 3.3 NP Objectives. Community &amp; Infrastructure – Agree with WBC this is not evidenced or addressed anywhere within the NP</p>		<p>Vision and Objectives: amend para 3.3 - delete second bullet point under Community and Infrastructure. <i>“To improve communications infrastructure so that Godalming and Farncombe remain competitive”</i></p>
<p>WBC point 4 - Housing</p>			

<p>WBC consider a local policy on housing mix is not necessary as this is addressed through the Local Plan. WBC consider there is no evidence that Godalming requires a different mix to that in LLP1 and that the policy introduces unnecessary duplication in the process of determining applications.</p> <hr/> <p>During discussions with WBC Planning Officers to clarify their consultation responses, they expressed concern that GOD1.A. provided too many variables to make it enforceable, resulting in it not achieving the NP aspiration of having a minimum of 50% of two or three bedroom dwellings on all sites over 10 dwellings.</p> <hr/> <p>WBC suggest the NP reference LPP2 (DM15) in regards to self or custom build</p>	<p>Although the LLP1 does provide a borough wide housing mix policy, The NPPF para 50 states that: <i>A local Authority should identify the size, type, tenure and range of housing that are required in particular locations reflecting local demand.</i></p> <p>As such it is considered appropriate that a Neighbourhood Plan considers the specific needs of the Neighbourhood Plan area. In doing so the Neighbourhood plan sought evidence from the 2015 SHMA Waverley Sub Area Addendum in particular the information contained in Table 15 and Table 18. The evidence contained in the SHMA supports WBC LLP1 Para 9.33 that states : <i>The analysis of the types of homes needed leads to the SHMA concluding that the provision of market housing should be more explicitly focused on delivering smaller family housing for younger households.</i></p> <hr/> <p>The housing mix needs for Godalming is higher than the Waverley average for two and three bedroom dwellings, the Neighbourhood Plan does broadly support AHN3. However, it is felt that the function of a NP is to reflect the needs of its community within the appropriate framework. With GofarNP area having a 5% greater requirement for two and three bedroom dwellings across the combined requirement of affordable and market sector housing than the Waverley average, it is felt that GOD1.A. provides a mechanism that will provide for a relative even delivery of the housing need mix during the period of the plan.</p> <p>It is suggested that second part of the first sentence and the entire last sentence of GOD1.A. is removed as it provides too much ambiguity of the intent of the Policy.</p> <hr/> <p>The Local Plan <b>Policy AHN3: Housing Types and Size</b>, states that: <i>The Council will require proposals for new housing to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA).</i> Whilst self-build is an aspiration of a growing number of people, the availability of building plots is a primary difficulty, therefore, the proposal to make at least 5% of dwelling plots on developments of 20 or more dwellings should be strongly supported as a means of helping to deliver affordable housing for those on the Waverley self-build register</p>	<p>Housing: amend para 4.4 to provide reference to the evidence base.</p> <p>Affordable housing figures = <i>GL Hearn (2015) West Surrey SHMA – Waverley Sub Area Addendum</i>, for WBC, table 15</p> <p>Market Housing figures = <i>GL Hearn (2015) West Surrey SHMA – Waverley Sub Area Addendum</i>, for WBC, table 18</p> <hr/> <p>GOD1 A. to be amended to read: <i>"All new residential developments (use class 3) of at least 10 dwellings should provide at least the required percentage of two and three bedroom properties as indicated for the Godalming area in the West Surrey SHMA Waverley Sub Area Addendum (November 2015)"</i></p> <hr/> <p>Add new paragraph 4.13 <i>"Policies that support Self or Custom building dwellings can help to provide delivery of affordable housing. Waverley LLP2 proposed policy (DM15) is strongly supported"</i></p>
<p>WBC point 5 – Economy - GOD2</p> <p>WBC highlighted that there are no specific ‘mixed use’ sites allocation in the LPP2, therefore this term has no meaning for this policy.</p>	<p>Accepted and reference removed, remainder of policy remains unchanged.</p>	<p>Economy: Amend wording of GOD2 to read: <i>'Development proposals to provide small-scale B-class employment opportunities as part of residential site allocations in the Waverley Local Plan Part 2, will be encouraged.'</i></p>
<p>WBC point 5 – Economy - GOD4</p> <p>WBC concerned that GOD4 could conflict with LPP1 Policy TCS2 Local Centres.</p>	<p>TCS2 Local Centres, states: <i>The retail role and function of the local centres of Farncombe, Bramley and Milford will be safeguarded and consolidated. Where planning permission is required, proposals which would harm or undermine the retail function of the centre by reducing its ability to meet its daily needs and/ or detracting from its vitality and viability will not be permitted.</i></p>	<p>Economy GOD 4</p> <p>Amend para 5.25 to read: <i>"With the limited ability of the Godalming Primary Shopping Area to physically expand, the growing retail needs of the expanding population would be best served through small scale expansion of Farncombe Local Centre. Some existing sites in the area are under-used and there is less restriction on re-</i></p>

	<p>WBC highlighted that Policy maps within the NP conflict with proposed LPP2 maps</p>	<p><i>Proposals for the provision of new small scale facilities will be supported, provided that they would support the vitality and viability of these centres and are appropriate to the role and function of the centre in the hierarchy.</i></p> <p>The GofarNP fully supports TCS2 and it is suggested that para 5.25 be amended to reflect the support for this policy. GofarNP policy GOD4 is not intended to conflict or restrict TCS2 but rather reflect a wish to encourage A1 to A5 class use (A1 shops, A2 financial and professional services, A3 restaurants and cafes, A4 Drinking establishments (but not night clubs) A5 hot food takeaways) in favour of, but not restricting permission for class B, C, D, or Sui Generis uses.</p> <p>-----</p> <p>This is to an extent an issue of lead and lag as described earlier. Policy maps should be audited to ensure conformity with LPP2 maps.</p>	<p><i>development than in Godalming Primary Shopping Area because it is not in a Conservation Area and has few listed buildings. Policy TCS2 of the LLP1 provides safeguards to local centres and supports provision of new small scale facilities. Opportunities to expand retail provision in or adjacent to the existing Local Centre in Farncombe will, therefore, be supported. The potential to develop adjacent to the existing centre boundary reflects a necessarily flexible approach”.</i></p> <p>Policy GOD 4 to remain unchanged.</p> <p>-----</p> <p>Policy maps used in GofarNP to be updated to those used in LLP2 preferred options document.</p>
	<p>WBC point 6 – Heritage &amp; Design</p> <p>Para 6.13. WBC feel that a number of tests/ policies /provisions/conditions set out in para 6.13 are not reflected in Policy GOD 5, WBC suggest it is advisable to include these in the policy. WBC also offer revised wording in regards to the established building line. WBC also highlight that 6.13 refers to the need for varied design to avoid uniformity, which is in conflict with policy GOD5 which requires new development to reflect neighbouring properties.</p> <p>WBC also consider that a number of elements in this policy are covered in greater detail in separate policies (such as the Godalming Hillside, parking and public footpaths and cycle paths and therefore it is not necessary for these to be included in GOD 5.</p>	<p>WBC are correct in their comment, in some ways this is due to different phraseology being used in the policy from that in the supporting text. A review of the supporting text has been conducted to provide revised wording of GOD5. WBC suggest the wording regarding established building line be amended so that the Policy refers “to the need for new development to respond to the existing street scene and in particular whether developments are setback from the road. WBC point regarding GOD5 to require new developments to reflect neighbouring properties being at odds with the supporting text in para 6.13 is accepted.</p> <p>WBC advice regarding the repetition of elements such as the Godalming Hillside policy is accepted and GOD5 should be viewed against other policies within the NP with the aim of removing those elements that are dealt with in greater detail elsewhere.</p> <p>The following sub-sections of Policy GOD 5 section B. are considered subjective and are already covered by the Town &amp; country Planning Act 1990 Section 70 (2)(c) – material consideration.</p> <p>Additionally LLP2 proposed Policy DM3: Safeguarding Amenity</p> <p>1. Development should avoid harm to the health or amenity of future occupants and existing occupants of nearby land, buildings and residences including by way of overlooking, loss of daylight or sunlight or overbearing appearance.</p> <p>c. Over development – The NP gives no guidance or evidence on how this is determined, as such reliance on Section 70 and if/when adopted LLP2 Policy DM3.1 is appropriate.</p> <p>f. Adverse effect relating to significant reduction in daylight through windows or obstructing the path of direct sunlight or window - The NP gives no guidance or evidence to support how this can be determined, as such reliance on Section 70 and if/when adopted LLP2 Policy DM3.1 is appropriate. is appropriate.</p>	<p>Design and Heritage GOD5</p> <p>Amend wording of GOD 5.A &amp; GOD 5.B to read:</p> <p>A. <i>“All development shall protect the amenity of neighbours, and be sympathetic to the scale, mass, height and form of neighbouring properties. Development proposals must demonstrate how they contribute positively to the features of the respective character areas, as described in the Godalming and Farncombe Character Area Assessments”.</i></p> <p>B. <i>“In particular, development proposals shall:</i></p> <p>a. <i>Retain historic buildings that contribute to the distinctive character and historic architectural interest of the Character Area;</i></p> <p>b. <i>Ensure they do not cause harm to views that are important to the character and heritage of the area, as exemplified by Policy God 8 and God 13.</i></p> <p>c. <i>Avoid the appearance of cramming by aligning with the established plots widths within the street;</i></p> <p>d. <i>Be in keeping with the form of development of properties in the immediate surrounding area, particularly with respect to the prevailing roofline;</i></p> <p>e. <i>Provide sufficient off-street storage for refuse and recycling bins associated with each new property;</i></p> <p>f. <i>New developments are to respond to the existing street scene, reflect the prevailing boundary treatments where such features are important to the character and appearance of the area, and in particular whether existing developments are setback from the road.</i></p>

	<p>-----</p> <p>WBC expressed concerns on the value of GOD5. C based on the creation of an additional burden on developers and the added burden on determination of planning applications.</p> <p>WBC considered greater specificity is required to assist the Council in assessing whether developers' proposals are adequate.</p>	<p>g. ensure that new buildings do not unacceptably reduce the level of existing private amenity space provision for existing residential properties. – The NP gives no guidance or evidence to support on how to determine what is unacceptable, as such reliance on Section 70 and if/when adopted LLP2 Policy DM3.1 is appropriate.</p> <p>Other sub-sections of the Draft 3.3 Section B that are either covered by, supported or enhanced by other policies are:</p> <p>b. Frith Hill Area of Special Environmental Quality and Godalming Hillside - LPP1 Policy RE3 Landscape Character (section v. Godalming Hillside) Additionally, although referred to in Policy GOD 5 but covered in para 6.13 supporting text, Views of the River Valley and other visually important sites are dealt with by GOD 8 &amp; LPP1 Policy RE3: Landscape Character <i>“New development must respect and where appropriate, enhance the distinctive character of the landscape in which it is located”</i>.</p> <p>AND</p> <p>LLP1 Policy TD1: Townscape and Design  <i>“The Council will ensure that the character and amenity of the Borough are protected by: Requiring new development to be of a high quality and inclusive design that responds to the distinctive local character of the area in which it is located. Account will be taken of design guidance adopted by the Council including design and development briefs, Conservation Area Appraisals and associated Management Plans, town and village design statements and other design policies and guidance produced within subsequent Development Plan Documents, Supplementary Planning Documents and Neighbourhood Plans”</i>.</p> <p>i. Parking and access arrangements – Covered by NP Policy GOD6</p> <p>j. Linking with and improving the network of footpaths and cycle paths – Covered by NP policy GOD9</p> <p>GOD 5.k. conflicts with the supporting text in 6.13 first point.i.e the need requirement to vary design and avoid uniformity. As such it is suggested that sub-section k is redrafted to reflect the need to respond to the existing street scene.</p> <p>In light of the above, GOD 5 should be redrafted to incorporate these points.</p> <p>-----</p> <p>Whilst the intentions of GOD5. C. are laudable, it could be argued that a Policy that does not impose a requirement but does add cost and potential delays to an application would be resisted by developers. However, the key word in GOD5.C. is ‘encouraged’. In other words the policy does not place a burden on the developer because they are not obliged to do it. Proposals are encouraged to address these matters and if they do so, that should weigh in their favour.</p> <p>In reviewing this issue it is suggested that LLP2 proposed policy DM3 better meets the aims behind GOD5.c.b.</p> <p>LLP2 DM3 States that:  <i>“All proposals for new housing developments (across all tenures) will need to demonstrate that they provide adequate internal and external space in order to ensure an appropriate living environment for future occupiers. To achieve this all new housing development should:</i></p>	<p>-----</p> <p>Policy GOD5.C.b to be deleted</p>
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	<p>WBC point 6 cont – GOD 6 - Parking</p> <p>WBC expectation is that Borough-wide parking standards, as set out in the Waverley Borough Council Parking Guidelines (October 2013), should apply throughout the Borough, therefore if the neighbourhood Plan requires more stringent standards there must be clear evidence to justify this.</p> <p>Additionally, WBC raise an issue regarding a level of conflict between GOD6.B and GOD6.C</p>	<p>Waverley Borough Council Parking Guidelines for residential development is stated below:</p> <p><b>Waverley Borough Council Parking Guidelines –October 2013</b> 4.13 <i>“The amount of car parking to be provided should be practical but, where appropriate, alternatives to the car should also be used to encourage sustainable transport choices. Appendix 2 sets out the proposed residential parking guidelines for Waverley; these include an allowance for visitor parking. These guidelines set out a minimum number of parking spaces that would normally be expected in the two zones. Where space permits it may be appropriate to consider increased provision”</i></p> <p>The GofarNP does not disagree with this statement. <b>Appendix 2</b> of Waverley’s guidance sets out the Recommended Guidance for Residential Development. The recommended guidance being: <b>Town Centre</b> – 1 &amp; 2 bed dwellings = 1 space per unit; 3+ bed dwelling = 1.5 spaces per unit. <b>Rest of Waverley</b> – 1 bed dwelling = 1 space per unit; 2 bed dwelling = 2 spaces per unit; 3+ bed dwelling = 2.5 spaces per unit.</p> <p>The GofarNP Policy GOD6 B. is in accordance with these figures with the exception that whereas the Waverley recommended Guidance includes an allowance for visitors within the figures, the GofarNP policy has stated that a “plus visitor space” requirement for 1 bed units outside of the Town Centre. The GofarNP Policy is not clear on whether this is 1 visitor space per 1 bed unit or 1 visitor space per development, if the latter, at a minimum ground space of 11.52m<sup>2</sup> per parking space, this could cause viability issues for many developments. The Housing SHMA indicates that Godalming has a higher need than the rest of the Borough as a whole for 1 bedroom dwellings, the delivery of which could be effected by this additional parking requirement. Additionally the GofarNP cannot provide quantifiable evidence of this additional need. As such it is suggested that the requirement for additional visitor parking provision is removed from Policy GOD6. However it is also suggested that a recommendation that <i>“where space permits additional parking provision is to be encouraged”</i></p> <p>Regarding the WBC observation that the Waverley Parking Guidelines Standards should apply throughout the Borough, it is argued that with the removal of the additional visitor parking requirement the GoFarNP is aligned with the Waverley Standards. However, the Waverley Standards are guidelines, whereas the purpose of the GofarNP Policy 6.B is to make these guidelines a requirement within the GofarNP area. It is therefore recommended that once modified this policy is an appropriate use of the Neighbourhood Plan process.</p> <p>The first part of GOD6.C is in line with the accompanying notes in Appendix 2 of the Waverley Guidance. Waverley’s guidance states that <i>“if it is considered that the number of spaces required is more than is necessary, information should be submitted with the application to justify a decreased provision (applies to all standards)</i> Whereas the GofarNP Policy GOD6, C states that:</p>	<p>Heritage and Design GOD6</p> <p><b>POLICY GOD6: PROVISION AND DESIGN OF RESIDENTIAL PARKING</b></p> <p>A. <i>Development proposals that generate an increased need for residential parking should provide adequate and suitable off-street parking in order to minimise obstruction of the local road network in the interests of the safety of all road users, including pedestrians and cyclists.</i></p> <p>B. <i>In the case of residential development, the following minimum off-street parking provision is required:</i></p> <ul style="list-style-type: none"> <li>a. <i>1-bed units:</i> <ul style="list-style-type: none"> <li>i. <i>Within the Godalming Town Centre Area, 1 space per unit.</i></li> <li>ii. <i>Outside the Godalming Town Centre Area, 1 space per unit</i></li> </ul> </li> <li>b. <i>2-bed units:</i> <ul style="list-style-type: none"> <li>i. <i>Within the Godalming Town Centre Area, 1 space per unit.</i></li> <li>ii. <i>Outside the Godalming Town Centre Area, 2 spaces per unit.</i></li> </ul> </li> <li>c. <i>3+ bed units:</i> <ul style="list-style-type: none"> <li>i. <i>Within the Godalming Town Centre Area, 1.5 space per unit.</i></li> <li>ii. <i>Outside the Godalming Town Area, 2.5 spaces per unit.</i></li> </ul> </li> <li>d. <i>Where space permits additional parking provision is to be encouraged.</i></li> </ul> <p><i>Note: The Town Centre Area is shown on the Policies Map.</i></p> <p>C. <i>The parking spaces required by Policy GOD6.B is considered to be the minimum required to support sustainable development within the Neighbourhood Plan area. A lower level of provision will only be permitted if it can be clearly demonstrated that a decreased requirement is justified. Evidence to support justification for a lower parking space provision is to be submitted with the planning application. This requirement applies to all parking provision standards</i></p> <p>D. <i>Parking spaces that take the form of open spaces or car port facilities, rather than garages, will be encouraged.</i></p> <p>E. <i>Development proposals that would reduce the existing level of off-street parking provision will be resisted unless it can be satisfactorily demonstrated that the amount of overall provision is adequate.</i></p>

<p>-----</p> <p>WBC parking Guidelines indicate how a combination of on-plot and off-plot and on street parking will often be appropriate and provides examples of how this may be achieved.</p>	<p><i>“A lower level of off-street parking provision will only be permitted if it can be demonstrated that it would be appropriate on a specific site”</i></p> <p>It is suggested that the wording of this part of the GoFarNP policy is amended to bring it closer to that of the Waverley guidance.</p> <p><i>“The number of parking spaces required by Policy GOD6.B is considered to be the minimum required to support sustainable development within the Neighbourhood Plan area. A lower level of provision will only be permitted if it can be clearly demonstrated that a decreased requirement is justified. Evidence to support justification for a lower parking space provision is to be submitted with the planning application. This requirement applies to all parking provision standards”.</i></p> <p>Following WBC advice, and to avoid challenge to what does or does not constitute <i>“adjacent to”</i>, it is suggested that the second requirement of this section of the policy is removed. The section being deleted being:</p> <p><i>“This particularly applies to residential development in or adjacent to the Godalming Town Centre Area, where it is recognised that lower levels of parking provision may be more appropriate”</i></p> <p>It is further recommended that a definition of the Town centre Area is provided <i>“the Town Centre Area is defined as that designated in the Waverley Local Plan)</i></p> <p>-----</p> <p>Waverley Borough Council Parking Guidelines –October 2013, Parking Design states that:</p> <p><i>“Parking spaces within streets and accessed directly from them minimise the amount of land given over to access ways and manoeuvring areas. They also offer ‘natural surveillance’ of parked vehicles, thereby reducing concerns about security, An arrangement of discrete parking bays adjacent to the flow of traffic is often the preferred way of providing on-street parking. It is recommended that, in most circumstances, at least some parking demand in residential and mixed-use areas is met with well-designed on-street parking. The following key principals for best practice for car parking arrangements have been taken from the Department for Transport’s Manual for Streets:</i></p> <ul style="list-style-type: none"> <li>• <i>The design quality of the street is paramount.</i></li> <li>• <i>There is no single best solution to providing car parking – a combination of on-plot, off-plot and on-street will often be appropriate.</i></li> <li>• <i>The street can provide a very good car park – on-street parking is efficient, understandable and can increase vitality and safety.</i></li> <li>• <i>Parking within a block is recommended only after parking at the front and on-street has been fully considered – rear courtyards should support on-street parking, not replace it.</i></li> <li>• <i>Car parking needs to be designed with security in mind.</i></li> <li>• <i>Consideration needs to be given to parking for visitors and disabled people.</i></li> </ul> <p><i>It is therefore essential that the design of the car parking spaces is introduced at the planning stage if it is to be well integrated with a high quality public realm. A range of approaches to car parking designed should be examined before reaching the appropriate solution, and in some cases it may result in a combination of designs being implemented as the most successful solution”.</i></p>	<p>F. <i>The design of new residential streets must demonstrate how on-street parking in excess of that required for residents and visitors will be minimised. Use of environmental and other visually attractive features including street furniture to manage on-street parking arrangements will be strongly encouraged, particularly in the Godalming Town Centre Area and along the identified Movement Routes (Policy GOD9).</i></p> <p>-----</p> <p>Policy GOD6.F amended as shown above.</p>
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<p>WBC Point 6 cont...</p> <p>Image below para 2.26 WBC officers disagree with the NP regarding whether or not the shopfront is an example of shop frontage. However they do agree that the use of muted traditional colours are preferred. WBC feel that the use of good examples is preferable to the highlighting of poor examples.</p> <p>-----</p>	<p>Whilst the comments from WBC officers are understood and appreciated, this remains a subjective opinion and the opinion expressed in the draft GofarNP has been through an extensive process prior to 'adoption' of the Qualifying Body, who in itself has not deferred from the opinion put forward in para 6.26</p> <p>The frontage shown below para 2.26 looks like a poor example of a WHSmith frontage. Below is an example from Ipswich town centre (in a conservation area) that is by far a better effort to incorporate into the historic fabric of the building and to use more sensitive branding. Also there are many examples elsewhere of national chains using different materials and styles for shopfronts in conservation areas.</p>	 <p>-----</p> <p>Image below 6.32. Internal illumination cannot be controlled by planning. It is suggested that care should be exercised so as not to raise expectation about an issue that the NP would not be able to influence</p>	<p>No action</p> <p>-----</p> <p>Amend para 6.33 and GOD7.B.g</p> <ul style="list-style-type: none"> <li>i. Delete the Corals picture and caption.</li> <li>j. Delete the final sentence of para 6.33.</li> <li>k. Delete the final sentence of GOD7.B.g.</li> </ul>
<p>WBC Point 6 cont.... GOD7</p>	<p>Broadly follows WBC shopfronts Design Guide SPD – no objects to this policy</p>	<p>This is a valid point amendments to this point need to be made.</p>	<p>No action required</p>
<p>WBC Point 6 cont ..... GOD8</p>	<p>WBC suggest broadening the policy to cover a 'panoramic view' in protecting the prominence of the church and its spire within the setting of the Lammas</p>	<p>WBC suggestion is strongly supported. The policy should be amended to reflect the suggestion and a policy map included to indicate the 'protected view'</p>	<p>Amend GOD8 to read:</p>

<p>Land. WBC suggest reflecting this in the policy with the area identified on the map.</p>		<p><i>POLICY GOD8: VIEW FROM CHALK ROAD/BRIDGE ROAD TO PARISH CHURCH</i></p> <p><i>Development should preserve the historic setting of the panoramic view from Chalk Road/Bridge Road towards the Parish Church of St Peter and St Paul, across the Lammis Lands as indicated on the policy map for Policy GOD8. Any development which has a detrimental impact on the setting of this panoramic view will be refused.</i></p> <p>Policy map for GOD 8 indicating the protected view to be included in the NP document.</p>
<p>WBC Point 7. Transport</p> <p>GOD 9 – No comment GOD 10 – No Comment GOD 11 – Recommend liaise with SCC</p>	<p>GOD 11. EVP's</p> <p>Waverley Borough Council's 2016 Air Quality Annual Status Report (ASR) – 2018 Reissue iv, states that:</p> <p><i>"Surrey County has the highest car usage in the UK, and in some of the more rural areas within Waverley the infrastructure for public transport is limited, encouraging vehicular usage further. It is with this knowledge that WBC's Air Quality and Planning Teams are encouraging developers to install EVP's at all major developments where appropriate and practicable. In addition, discussions are underway regarding the inclusion of a specific requirement for EVP's in new developments in the evolving Local Plan Part 2. The transport plans within Waverley and Surrey County are dedicated to more walking and cycling provisions, and regularly review options for cleaner vehicles through the bus and taxi services that are available across Surrey".</i></p> <p>The GofarNP, as does Waverley as indicated above, supports the encouragement of developers to install EVP's. It is acknowledged that installation on existing developments is challenging, whereas installation on new sites is easier to achieve. In order to reduce reliance on combustion engines vehicles (which is a central government aim) all tiers of local government will need to work towards this aim. The key point is that GOD11 'encourages' rather than 'requires' provision, however, it is acknowledged that there may be some difficulties in providing EVP's in some locations, as such it is suggested that the wording or GOD 11 is amended to include 'where practicable'</p>	<p>Amend God 11 to read:</p> <p><i>"Where vehicle spaces are provided to support development, where practicable the associated provision of charging points for electric vehicles (both on-street and off-street) that can be used by the occupiers of residences and business premises in the Godalming and Farncombe Neighbourhood Plan area will be encouraged"</i></p>
<p>WBC Point 8 – Environment</p> <p>GOD 12 – no comment</p> <p>Para 8.19 – supporting text should be updated to reference policy RE3 from LLP1 as well as policy BE5 from Local Plan 2002</p>	<p>Done as part of actions associated with WBC Key Issue 2.</p>	
<p>WBC Point 8 cont.....Hillsides Policy</p> <p>In addition to the points raised under Key issue 2, WBC note the proposal regarding 'skyline' restrictions on development. WBC LLP2 Preferred Options paper suggest there is no need for a skyline element to the Godalming Hillside Policy, therefore the Neighbourhood Plan should include evidence to the contrary or remove the policy from the NP</p>	<p>Conversely, it could be argued that the LLP2 preferred options topic paper does not show any evidence in support of the local community being in favour of not having some form of restriction regarding development along the skyline. The primary principle of the Neighbourhood Plan process is to reflect the wishes and needs of a specific locality. The GoFarNp has been through a lengthy community engagement process, has been drafted by members of the community and Reg 14 consultation submissions from Historic England and the Frith Hill Area Residents Association indicates that there is support for a level of protection to the Godalming Hillside skyline.</p>	<p>The proposed re-drafting of the GofarNP Policy GOD 13 is shown above at WBC Key Issue 2</p>
<p>WBC Point 8 cont....</p>		<p>Update footnote 17 to read:</p>

	WBC suggest the footnote accompanying footnote 17 of para 8.25 give the full title document.	agreed	<i>“Waverley Borough Council: 2015 Updating and Screening Assessment for Waverley Borough Council In fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management – dated May 2015”</i>
	WBC Point 8 cont..... See comment under point 4 of Key Issues	Details response to this point is provide above at WBC key Issue 4.	
	WBC Point 9 – Community & infrastructure  God 16 – No Comment  GOD 17 – WBC considers it unnecessary for the policy to restate policy LRC1 of the LLP1 as LRC1 will be applied to all developments within Godalming.  ----- As a general comment it would be helpful to liaise with WBC Leisure team on matters covered in para 9.10 - 9.26	Agreed – duplication of policies should be avoided.  ----- Agreed – as the NP Qualifying Body, Godalming Town Council already works closely with the WBC leisure team and wishes to continue to do so.	Amend GOD17.  Delete Para A.  Renumber existing Para B -D  -----
	Policies Maps  The settlement Boundary arrears in the key of the Policies Maps but does not appear on the map. The settlement boundary for Godalming is being defined by WBC in LLP2, therefore the settlement boundary shown on the map will be superseded.	The NP has been drafted using the existing maps, with the adoption of LLP1 and the emergence of LLP2 care needs to be exercised to ensure the correct policy maps are used	Update policy maps to reflect latest versions.
10	Witley Parish Council  Witley support the initiatives and ideas in the GofarNP, particularly in relation to transport and infrastructure as Witley’ own research indicate these are major concerns of their residents.  ----- Witley note para 7.37 regarding exploring a park & ride scheme and feel that due to the proximity of the Train station, such a scheme might not be effective.  ----- Witley PC would support attempts to link up Milford with Godalming on a safe cycle route.	Witley do not believe any suitable sites exist within towards the South of Godalming that would support a Park & Ride scheme, they also question the viability of such a scheme. The GofarNP has not set a policy for a Park & Ride scheme but has highlighted an aspiration to explore the feasibility of any such scheme. Within any feasibility study not only would a suitable location have to be identified, but a robust business case would also have to be established. Any such scheme would have to be looked at in collaboration with neighbouring Parishes as well as with Surrey County Council and Waverley Borough Council.  ----- The GofarNP has identified Priority schemes for improving cycling within the GofarNP area. To a large extent these are associated with the Godalming Cycle Campaign’s Guildford to Godalming ‘Greenway’ cycle scheme which has been adopted by SCC local committee and supported by Guildford Borough Council. It is to be hoped that the continuation of the Greenway might be possible and that the Witley PC would support the Godalming Cycling Campaign in the future development of any extension into Milford.	

	<p>-----                  Witley own NP identifies that their residents are equally concerned about school places and doctors surgeries. Witley PC highlight that para 9.30 is not in keeping with plans that they have seen for Rodborough School to increase their number of school places in the next few years.</p> <p>-----                  Green Corridors – Witley would wish that effort is made to preserve the separation between Milford and Godalming so that the village is not subsumed into Godalming and that safe corridors are maintained for our varied wildlife.</p>	<p>-----                  Information in the GOfarNp is the published information from Surrey County Council’s 2016 school places report. As with any process such as a Neighbourhood Plan, the report is based on a ‘moment in time’ Having reviewed SCC revised School Organisation Plan issued in January 2018, the revised plan gives no indication of any decision to expand Rodborough Secondary School. However, it does state that:  <i>“School commissioning Officers are exploring options that may be required to meet any increase in demand. This involves co-ordination with local schools as well as local planners and housing developers”</i></p> <p>Information shared with Witley PC, have not been included in the SCC’s January 2018 School Places Plan covering the period 2028 - 2027</p> <p>If Rodborough School to expand then undoubtedly there would be an increased demand on places at Godalming College.</p> <p>-----                  The GofarNp Policy GOD 12 - Green Corridors; aims to both maintain and enhance safe corridors for the varied wildlife of the area. The GofarNP has not identified any development site which would encroach on the existing separation between Milford and Godalming.</p>	<p>-----                  Update reference (footnote 23) to:  <i>Surrey County Council, School Organisation Plan (January 2018) School Places in Surrey 2018 - 2017</i></p> <p>-----</p>
<p>11</p>	<p>Woodland Trust</p> <p>The woodland trust is pleased to see that the vision for Godalming and Farncombe identifies the importance of its quality landscape, how it is enriched by its open aspect to the countryside, whilst also seeking to avoid harm to important landscape views and by seeking to protect and enhance the environment.</p> <p>The Woodland Trust states that the Local Plan Policy NE1 (Biodiversity and Geological Conservation) should be taken into account by the GofarNP. Therefore the vision for the GofarNP should be amended to also seek to protect and enhance the local landscape character and include:  <i>“To protect and enhance the local environment, green and open spaces, native woodland, veteran trees hedgerows and trees”</i></p> <p>The Woodland Trust considers that the GofarNP should also seek to ensure development must conserve mature trees and hedgerows, so there is no loss or degradation of ancient woodland in the parish. The trust would also wish to see the support in conserving and enhancing woodland and trees and planting of trees in appropriate locations.</p>	<p>It is commonly acknowledge that Waverley is the most wooded borough within the most wooded county in England, as such Waverley Borough Council the GofarNP also acknowledges the importance of the natural environment.</p> <p>Within Waverley, Godalming is the second largest settlement within the hierarchy of the Borough and it is difficult to associate the description of Godalming by the Woodland Trust as a small rural settlement.</p> <p>It should be noted that the GofarNp aims to enhance policies contained within the NPPF and the Waverley Local Plan it does not aim to repeat policies contained within these frameworks and whilst the GofarNP may not specifically elude to ancient woodlands it does seek to provide and enhance environmental protections for our community.</p> <p>GofarNp acknowledges and seeks to address the protection of:  <i>“the sensitive natural environment in which Godalming and Farncombe sits, which is defined by the River Wey and the Lammas lands, along with the hillsides that rise up and provide a very visible setting for the town.”</i></p> <p>Additionally the GofarNP sets out a vision that in 2032  <i>“The growing population has not been to the detriment of Godalming and Farncombe’s environment or infrastructure. Existing community facilities have been protected and new facilities delivered alongside growth. Equally, new development has protected and enhanced the high quality natural environment which defines the setting of the town and has been designed to be as sustainable as possible. Godalming and Farncombe has grown, but not at the expense of the environment, or the health and wellbeing of its people”</i></p>	

<p>The trust evidence the draft revised NPPF para 1783.C which is undergoing consultations which states: <i>“Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged or veteran trees that lies outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss;”</i></p> <p>As such the trust would wish to see the following included in the GofarNP <i>“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”</i></p> <p>The Woodland Trust suggests that the GofarNP is more specific about ancient woodland protection and wishes to see buffering distances set out with a 50m buffering distance to protect the core of the woodland from development in the geographical area of the NP.</p> <p>The Woodland Trust considers Godalming and Farncombe to be a small rural settlement which needs to retain and enhance its rural character, whilst taking the opportunity to think about how trees can enhance a community and the lives of its residents. As such the Trust would like to see the importance of trees and woodland for providing for healthy living taken into account in the NP.</p> <p>Finally whilst a variety of community infrastructure is being taken into account with the priorities of the NP, the Woodland Trust would also wish to see protection for ancient hedgerows and deciduous woodlands, as well as also seeking to retain and enhance open greenspace and resist the loss of open space. The Trust would also wish to see consideration to accessible open space with an aspiration of that no person should live more than 500m from at least one area of accessible woodland of no less than 2Ha in size and that there should be at least one area of accessible woodland of no less than 20ha within 4km of peoples homes.</p>	<p>Amongst the plans objectives are:</p> <ul style="list-style-type: none"> <li>• <i>“To protect and enhance thje sensitive natural environment in which Godalming and Farncombe sits.</i></li> <li>• <i>To ensure development enhances the potential for local flora and fauna to thrive”</i></li> </ul> <p>The plan identifies that over 60% of those who responded to the NP public questionnaire identified planting of small tree/shrubs to enhance the street scene as important. With the NP acknowledges issues such as boundary planting, these can be addressed by well-designed developments and that many of these issues are covered by the Local Plan Policy D4.</p> <p>The Waverley Local Plan NE1 is the principle policy within the area for biodiversity and geological conservation and the GofarNP should not seek to either contradict or undermine these policies as this may lead to the local planners being unable to apply clear policy, which could be to the detriment to that which we seek to protect.</p> <p>Para173.c of the NPPF also seeks to provide a high level of protection and any planning application to the local authority will be considered in light of the NPPF and Local policies.</p> <p>Ancient woodland and veteran trees are also accorded protection as a material planning consideration under the advice of Natural England and Forestry Commission guidance (known as ‘standing advice’) This standing advice assists planning authorities in deciding upon application affecting ancient woodland and veteran trees.</p> <p>Regarding hedgerows, whilst the removal of a hedgerow is unlikely to require planning permission, but if removal is proposed as part of a planning application then its impact on the heritage significance of the area and its impact on the setting of any heritage assets around may be taken into account in accordance with planning policies in the National Planning Policy Framework (NPPF) (1) and the local development plan. Additionally, aside from the planning system, hedgerows are offered some protection under The Hedgerow Regulations 1997 (2).</p> <p>Waverley Local Plan RE3 also provides protection to the Godalming Hillsides, whilst GofarNP Policy God13 seeks to enhance that protection with the suggested revised text:</p> <p><i>“In addition to the requirements of Waverley Local Plan Policy RE3 (Landscape Character, section v. Godalming Hillsides) As part of the protection of Godalming’s tree-lined hillsides and their importance to the character and setting of Godalming and Farncombe, development is expected to ensure that it retains the appearance of the tree-lined slopes and skyline”.</i></p> <p>In addition to the Godalming Hillside Policy, ancient, many veteran and visually important trees within the NP area are protected under The Town and Country Planning (Tree Preservation)(England) Regulations 2012.</p> <p>Additionally, The LLP2 DM8 states that:</p> <p><b>DM8: Trees, Woodland, Hedgerows and Landscaping</b> The Council will support development which:</p>	
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- a) retains woodland, important trees, groups of trees and hedgerows;
- b) adequately protects trees and hedgerows during all phases of development to avoid damage including activities causing soil compaction or severance of roots;
- c) Provides adequate separation between trees or hedgerows and the proposed development, so as to secure their long-term retention and potential growth, including for trees to be planted as part of the development's landscaping scheme and;
- d) Incorporates high quality landscape schemes, appropriate to the scale, nature, and location of the development. Proposals should include details of the long term management and maintenance of new and existing trees and landscaping; unless the need for, and benefits of, the development in that location clearly outweigh the loss of these features, or a commensurate level of landscape mitigation or enhancement.

**Explanatory notes to DM8**

Development resulting in the loss or deterioration of ancient woodland and the loss of aged and veteran trees outside of ancient woodland in particular will be resisted, unless the need for, and benefits of, the development in that location demonstrably outweigh the loss. Ancient woodland are areas which have been wooded continuously since at least 1600, and as such are irreplaceable habitats of significant cultural, historic, and environmental value. Many ancient woodlands are identified on planning maps, however lower density and smaller woodlands may not be identified.

Ancient woodland and veteran trees are irreplaceable, and so compensation for their loss should not be considered as a potential benefit of a development. The poor condition of an ancient woodland should not be considered as a factor in favour of a development, as good management will normally improve its condition.

Development can have direct and indirect impact on woodlands and trees which will threaten their retention including through ground pollution, changes to the water table, and the loss of semi-natural habitats next to ancient woodland.

When considering consultations by the Forestry Authority in respect of felling and thinning licences, woodland creation and woodland grant scheme applications, the Council will support proposals which are sympathetic to local landscape character, conserve wildlife habitats and which include acceptable proposals for replanting or management.

The Council may attach planning conditions, seek planning obligations or make Tree Preservation Orders to ensure future protection and management of important trees including new planting where appropriate.

DM 20 – Conservation provides additional protection within Godalming's conservation areas, where, six weeks' notice is required for works to trees that have a trunk diameter of more than 75mm when measured at 1.5m from ground level (or more than 100mm if reducing the number of trees to benefit the growth of other trees). This gives the Waverley Borough Council an opportunity to consider whether a Tree Preservation Order should be made to protect the trees.

Policy God 8 seeks to protect the historic view across the Lammas Lands water meadows, whilst the Waverley Borough Council Parking Guidelines –October 2013, Parking Design provides guidance on tree planning within car park settings.

Policy God 12 Green Corridors states that;



		<p><i>“In order to achieve net biodiversity gain across Godalming and Farncombe development will be expected to preserve and enhance the wildlife corridors identified on the policy map. In particular, new development proposals should incorporate provision for local wildlife to thrive.”</i></p> <p>The four areas of ancient woodland within the parish of Godalming are both identified as part of the green corridors, as such they are all represented under GofarNP policy God 12. In addition Policy GOD 13 and Local Plan Policy RE5 also provide protection to the hillside woodlands.</p> <p>Tree planting is also encouraged as part of policy GOD 15 to help minimise the impact of air pollution thus helping to health and wellbeing of residents.</p> <p>Waverley Local plan part 2 – preferred Options Policy DM20.c provides for protection of open spaces within Godalming’s conservation areas.</p> <p>It is suggested that the issues raised by the Woodland trust are adequately dealt with by the GofarNP, Waverley LP, NPPF and other legislations, Standing advice and regulations, and that any additional requirements in the GofarNP would not add to the protections already available. Whilst it could be argued that the GofarNP could include <i>“to protect and enhance the local environment, green open spaces, native woodland, veteran trees hedgerows and trees”</i></p> <p>The requirement to specifically identify native woodland, veteran trees, hedgerows and trees, over and above that already identified and covered within the GofarNP policies is not evidenced from many public events, NP questionnaire etc that residents have a desire over and above that already expressed in regards to the Godalming Hillside, Green Corridors, and the environment in general already expressed within the GofarNP.</p>	
12	<p>Frith Hill Area residents Association.</p> <p>The Frith Hill Area Residents Association (FHARA) committee support the Vision and Objectives laid out in the Godalming and Farncombe Neighbourhood Plan and congratulate those involved on an excellent draft. The FHARA suggest two ammendments to the plan as drafted.</p> <p>Error on Policy Map page 74 - The association highlight an error on the boundary of the Godalming Hillside policy BE5, which has not been corrected since it was pointed out and agreed with WBC in 2005, and followed up in 2013. The FHARA consider this a significant error as it as the maps currently stand they fail to protect the boundary at the bottom of the hill. The FHARA wish this to be corrected before the Neighbourhood Plan is published.</p> <p>Policy God 13: Godalming and Farncombe Skyline: The FHARA have highlighted concerns regarding the wording of GOD 13 and suggested alternative wording for this policy.</p>	<p>The GofarNP policy maps are taken from the Waverley Local Plan. However Waverley’s LLP2 – preferred options documents states at para 5.13 <i>“There are several small areas identified for amendment on the maps below (Maps 12 &amp; 13). These amendments are mainly due to poorly digitised layers or ensuring that the designation includes the wooded areas”</i></p> <p>That said, the amended map provided by the FHARA has been passed to WBC for checking against the policy maps within the LLP2.</p> <p>The issue of wording for policy God 13 has been dealt with at an earlier point (WBC Key Issue 2) having taken into consideration the points raised by the FHARA.</p>	
13	Comments and Representations from Local Resident:		

<p>Para 2.6 <b>"Since Post war era"</b> – not clear when this ended , be more precise.</p>	<p>agreed</p>	<p>Amend para 2.6 to read:  <i>"Godalming is regarded as an expensive residential town, partly due to its visual appeal, favourable transport links and high proportion of private housing<sup>1</sup>. Between 1950 and 1980, Godalming experienced a large expansion in housing with new estates being built on previous greenfield sites in Binscombe, South Hill, Farncombe Hill/Twycross, Bargate Wood and Aarons Hill areas of the town. In addition, there have been a growing number of developments in the once industrial area of Catteshall Road, resulting in the loss of industrial buildings and land."</i></p>
<p>3.1 <b>Bullet point one</b>- Whilst social care is required to address people's needs as they age, it should also be recognised that there is a period between retirement and social care when an intermediate form of housing is needed.</p>	<p>The need for residential and social care does not limit itself to housing needs but covers a range of issues. The general issues of housing needs are covered under para 3.3 Housing – <i>"To address the housing and social care needs of the population of Godalming and Farncombe"</i> And at para 4.1.a. <i>"lack of suitable accomadation for over 55s. who represent the town's fastest growing resident group;....."</i> The BNP goes on to say that: Para 4.5 <i>"This suggests that the predominant need for smaller houses has been recognised and is being addressed.....For this reason, the GoFarNP does not seek to duplicate this by trying to address issues relating to the needs of younger people or older people who do not have particular needs in terms of supported housing and care."</i></p>	
<p>3.1 <b>Bullet point five</b> – The point is important but not clearly expressed. It is not phrased as a 'challenge' which is what the list is stated to be about. Suggest re-worded to: <i>"making use of sustainable modes of transport more attractive by improving the provision for walking and cycling"</i></p>	<p>Agreed</p>	<p>Amend 3.1 bullet point 5 to read: <i>"making use of sustainable modes of transport more attractive by improving the provision for walking and cycling"</i></p>
<p>3.2 <b>final paragraph</b> – The phrase "as sustainable as possible" is vague. Perhaps <i>".....designed to maximise sustainability"</i> would be better</p>	<p>agreed</p>	<p>Amend 3.2 final paragraph to read: <i>"The growing population has not been to the detriment of Godalming and Farncombe's environment or infrastructure. Existing community facilities have been protected and new facilities delivered alongside growth. Equally, new development has protected and enhanced the high quality natural environment which defines the setting of the town and has been designed to maximise sustainability. Godalming and Farncombe has grown, but not at the expense of the environment or the health and wellbeing of its people"</i></p>
<p>4.4 <b>table</b> – The table shows that the need for 1 bedroom housing is greater than all others. The plan should note, consider and recommend regarding this statistic.</p>	<p>As commented on above, the predominant need for smaller houses has been recognised by the SHMA and by WBC Local Plan: The Local Plan <b>Policy AHN3: Housing Types and Size</b>, states that: <i>The Council will require proposals for new housing to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA).</i> As such the need for 1 bed units is covered by an existing policy. The aim of GOD1 is to deliver on 2 and 3 bed units which have a combined requirement of 65% of the combined social and market housing need, against 26.5% of the combined need for 1 bedroom housing. Further comment is supplied at WBC Point 4 – Housing.</p>	

<sup>1</sup> Dyckhoff, Tom (19 September 2009). "Let's move to Godalming, Surrey". The Guardian. London. Retrieved 19 September 2009.

<p>4.7 <b>Whole paragraph</b> – Strongly supports this point – but would like to see more of this point made in the plan.</p>	<p>The GoFarNP – has not identified or allocated any sites which might be suitable for the provision of ‘extra-care’ without doing so, along with the landowners support to allocate land to this use, the best that the NP can achieve is to “strongly support” proposals for the delivery of extra care (Use Class C2) facilities, which is expressed in Policy GOD1.B.</p>	
<p>4.10 <b>important additional Point</b> – this point is well made and supports 4.7. However it seems to be missing an important point is that the ‘smaller home’ alluded to is generally required to be on one level.</p>	<p>It is suggested that this point be made within the text of para 4.10</p>	<p>Amend 4.10 to read: <i>“Extra care is not the only requirement for the ageing population. Increasingly, older people are retaining their independence for longer and wish to remain in their own homes rather than move into an institutional setting. The provision of the right type of housing to address this need is paramount. Smaller dwellings are in strong demand from older people but what they are seeking is often different to the first-time buyer, with many requiring homes that are on one level. Typically, older buyers are looking to downsize from large, family homes and therefore have significant amounts of equity. So a smaller home may well be a spacious two or three-bedroom property with a small garden. It is important that new development provides for these needs. This will also have the benefit of freeing up family homes as currently, many of these older people prefer to stay in their family homes rather than move out of their local community. Other factors such as the cost of stamp duty on a house sale deters some from moving, the lack of supply of smaller properties is also a significant factor.”</i></p>
<p>6.9 <b>and throughout the document</b> – Should the abbreviation GoFarNP be used or should the name be given in full? Alternatively, this plan may be a better phrase.</p>	<p>As stated GoFarNP was a useful abbreviation during drafting, but may not be appropriate for the final version.</p>	<p>Amend document to replace GoFarNP with either Godalming and Farncombe Neighbourhood Plan or ‘this plan’ as appropriate to the context of the supporting text.</p>
<p>6.18 <b>second sentence</b> “....not have much.....” Is vague.</p>	<p>Agreed, but in line with the context of the statement suggest that it should say “.... does not have sufficient, safe off-street parking.....”</p>	<p>Amend paragraph 6.18 to read: <i>“Residential parking was raised as a significant issue by the community throughout the preparation of the GoFarNP. With a high proportion of semi-detached and terraced houses as well as flats, Godalming and Farncombe does not have sufficient, safe off-street parking for its residents. As such, and with growing levels of car ownership, the amount of on-street parking has increased. This impacts upon the safety of pedestrians and cyclists, as well as creating amenity and access problems for refuse and, of greatest concern, emergency service vehicles. The additional new development that is planned means it is even more important to deliver solutions which address this issue.”</i></p>
<p>6.19 <b>First and second sentence</b> – ‘....minimise the amount of...’ does not give clear guidance and the sentence ‘ It is important that this does not simply encourage higher car ownership’ is introducing an uncontrollable and unenforceable wish.</p>	<p>Re-word the beginning of para 6.19</p>	<p>Amend paragraph 6.19 to read: <i>“It is therefore paramount that new development is designed so as to minimise the opportunity for on-street parking. New streets should be designed so as to discourage residents from parking on the street and instead park in the off-street areas provided for them. Use of car ports – which are open structures making parking easier than in garages, whilst still retaining storage above – and parking courts – provided they are designed to minimise criminal activity – can be effective ways of providing off-street parking. Equally, new streets can be designed so that it is not possible to simply park on them, for example through the provision of permanent planters or other structures where parking spaces would normally be – this also has the added benefit of making the street more visually attractive.”</i></p>

	7.10 <b>Sixth bullet Point</b> – comma missing after the second ‘Farncombe Hill’	Agreed	Amend to read: <ul style="list-style-type: none"> <li>Existing roads closed to motorised traffic, such as the route leading from Farncombe Hill onto the old Farncombe Hill, should be made fully accessible to pedestrians, wheelchair users and cyclists</li> </ul>
	7.10 <b>Eighth Bullet Point</b> – the phrase pedestrian lanes is used without any definition of what they are	Pedestrian lanes are walkways such as Broadwater Lanes and pedestrian alleyways. A clarification is needed	Amend bullet point to read: <ul style="list-style-type: none"> <li>Pedestrian lanes (such as Broadwater Lanes) and pedestrian alleyways should be improved and maintained</li> </ul>
	7.10 <b>Ninth bullet Point</b> – Agreed that Bridge Road is in need of significant improvement. It is the main connecting link between Farncombe and Godalming with a high pedestrian footfall on a path that is not wide enough, in places for pushchairs or wheelchairs to pass. It is an uncomfortable route to cycle. Suggesting one limited solution underplays the scale of the rethink needed in the redesign of this road.	Good point, suggest this bullet point is re-worded	Amend bullet point to read: <i>“Bridge Road is the main connecting link between Farncombe and Godalming, not only for motorised traffic, but also cyclists and pedestrians. This road should be re-engineered so as not only provide pedestrian footpaths that allow for pushchairs and wheelchairs to pass at all points without having to encroach on the roadway, but also for a safe cycle route along its length.”</i>
	7.11 <b>Whole paragraph</b> – Pedestrian and cycle access through new developments also needs to be considered with plans for new developments demonstrating that desire lines for walking and cycling have been considered in relation to key destinations and existing routes.	Suggest re-wording of this paragraph	Amend para 7.11 to read: <i>“Many of these issues can be dealt with outside the planning system. However, new development does offer to opportunity to address these matters and it is considered that greater weight should be given to considerations of both pedestrian and cycle access through new developments as well as movement along public routes which development adjoins. New development should demonstrate that desire lines for walking and cycling in relation to key destinations and existing routes have been considered.”</i>
	<b>Policy GOD 9</b> – Change “...all new developments should ensure...” To ...”all new developments should provide...”	<p>Whilst the wording change seems minor, there is a possibility that this would place a burden on development to provide new infrastructure when it might not actually be needed – and with ‘all new development’ that includes proposals for a single new dwelling.</p> <p>However, as the aim of GOD9 Movement Routes is to encourage and allow for easier movement around the area, it is important to ensure that development, irrespective of size, does not either break the existing movement route, or where deviations to pre-existing routes (which might just be desire lines) are caused by development, then the infrastructure to re-establish the link should be a requirement.</p>	Amend Policy GOD9. A to read: <b>A. To ensure that residents can walk safely to the town centre, public transport facilities, schools and other important facilities serving Godalming and Farncombe; all new developments should provide safe pedestrian and cycle access to link up with existing footways and cycle routes that, in turn, directly serve the Movement Routes shown on the Policies Map.</b>
	<b>8.8 whole paragraph</b> – the current wording provides an incomplete understanding of the concept of a Green Corridor.	Agreed	Amend wording of para 8.8 to read: <i>“A green corridor is a strip of land that provides sufficient habitat to support wildlife and its movement along it. A continuous hedgerow, footpath, verge, riverbank or railway embankment can be valuable in this respect but wider strips are more likely to provide a variety of habitats and hence be more effective. Other green spaces such as playing fields, parks, cemeteries or allotments can also be contribute to green corridors since they generally provide wildlife habitats.”</i>
	8.10 and 8.11 incorrect paragraphing.	Agreed 8.10 and 8.11 should be re-arranged.	Amend paraphrasing of 8.10 and 8.11 to read:  8.10 The primary reason for identifying green corridors is so that they can be protected and managed to improve their benefit for wildlife. However, this does not imply that green corridors will be exclusively set aside for this purpose. Some green corridors are suited to human recreational access and/or can provide space for 'green routes' for non-motorised transport. While it may seem counter intuitive to improve human access

		<p>to green corridors, the public often enjoys right of access already and well considered routes provided with quality paths can manage footfall away from areas that are sensitive for wildlife.</p> <p>8.11 Small interruptions to continuity are excepted, e.g.</p> <ul style="list-style-type: none"> <li>• roads or other transport routes</li> <li>• isolated buildings with surrounding gardens or farmland</li> <li>• narrow bands of building likely to be subject to redevelopment.</li> </ul> <p>Where continuity is interrupted, wildlife tunnels or bridges, suitable planting (to mitigate the presence of isolated buildings) and appropriately aligned and planted green space can mitigate any detrimental impacts on wildlife.</p>
8.19 <b>whole paragraph</b> – this paragraph require clarification	Agreed, see WBC Key Issue 2 for amended wording of para 8.19. However it should be noted that the wording as currently exists within the Local Plan Policies cannot be amended.	
<b>9.27 to 9.32 Missing Point</b> – Section appears muddled with no clear resolution to the conflict between local perceptions and County Council pronouncements. Has any attempt been made to understand the local concerns beyond a box ticking exercise on a survey? Whatever might be concluded about the need (or not) for school places, it is apparent that there is an underlying acceptance that it is ok for children to engage in lengthy commutes. Given all that has been set out in the transport section of the plan regarding congestion and pollution, it is surely essential that the location of education provision minimises travel. This should at least feature as one of the criteria to be considered.	Whilst the frustration of the sentiments expressed are understandable, the Neighbourhood plan in this context can only report on the local provision of school places unless it were to be supporting the provision of a new ‘Free School’ which it is not. Whilst the location of all the schools in the Godalming School Planning area are known, what is not is the choices made by parents regarding the where they wish to send their children. It is no longer the case that a child necessarily goes to the nearest school as the Education Act provides parent with a degree of choice. Hence a parent in Northbourne may wish to send a child to a school in Busbridge as opposed to Loseley Field or visa-versa.	
<p><b>Section 8 or 9 Environment or Community and Infrastructure</b></p> <p>The issue of balancing the provision of formal and informal recreation space is raised in the Environment section (paragraph 8.5.) This is an important point that needs to find expression in a policy. However, the issue falls between ‘Environment’ and ‘Community and Infrastructure’ and the policy seems to have somehow been lost.</p> <p>There is an unquestionable need for informal recreation space where people can walk, sit, jog, ride their bikes and exercise their dogs. Nevertheless, it is easy for available green space to be gobbled up by the needs of formal recreation in the form of sports pitches and golf courses. There is a requirement to consciously balance the two needs and development plans should demonstrate that the appropriate thinking and design has been undertaken... hence the need for a policy.</p>	Informal recreation space such as the Lammas Lands, Miltons Wood, the river walk between Borough Road and Milton Wood behind Peperharow Road and the Wey Navigation are some of the areas already provided protection under the Local Plan and to an extent the GoFarNP. Waverley Borough Council has conducted a Green Belt review for the Borough and within the GoFarNP area, those bits of Greenbelt that are to be released have been identified, thus providing Green Belt protection to the great swathes of Green Belt land surrounding Godalming and Farncombe. It is difficult to see how a separate policy which is not already covered under the NPPF, the Town and Country planning Act or the Waverley Local Plan 2018 can add anything to the protection afforded to informal recreation areas, especially as the Neighbourhood Plan has not identified where these areas are located.	
<b>Final Point</b> – The equation of the NP being ‘more houses, means more people, means more cars, means more congestion, means more pollution. This seems	The NP does not have the power to require or force a private company to provide buses to pick up their customers. The issue of on-street parking restrictions is managed through parking reviews conducted by Surrey County Council. Where this has been done and	

	<p>hard to argue against and runs as a recurring theme throughout the plan.</p> <p>The inevitable logic can only be broken by reducing the desire people have to travel by car. Better walking and cycling routes will help but will take time to develop. In the meantime, streets clogged with cars sitting doing nothing other than taking up space while they wait for their owners to need them make streets unattractive as routes for walking and cycling.</p> <p>Godalming and Farncombe have significant congestion and parking issues generated by commuters endeavouring to access the rail-stations. The cars they use reduce the accessibility of the town to shoppers and those needing to get to essential services. This, in turn, stifles trade and restricts viability. Yet councils seem powerless to improve bus services.</p> <p>I personally believe that courageous action is needed and that this should be clearly set out in the Godalming and Farncombe Neighbourhood Plan. A statement of clear intent enables all parties to make their own plans in an informed way. This is what having a plan is all about.</p> <p>I believe the courageous action needs to be:</p> <p>a) lay the responsibility for ensuring that customers can access the stations firmly on the doorstep of the franchise holder, South Western Railway. They are the transport experts. I believe they run bus services as well as trains. When the limit of their own, on-site parking has been exhausted, they should not expect the local community to make good any deficit. They should survey their customers to find out from where and when they are travelling to the stations and provide buses on whatever cost basis they believe to be most appropriate.</p> <p>b) on its part, the neighbourhood plan should make clear an intention to introduce parking restrictions that rule out all day parking on the streets and in the car parks within the vicinity of the stations. Thus, the parking that is available becomes accessible to those bringing business into Godalming town centre and our other local retail areas.</p>	<p>restrictions have been imposed it has benefitted the residents of the area, although the reality is that the vehicles that were 'all day parking' have just been displaced to the next 'unrestricted area'</p> <p>The primary retail area of Godalming is within a restricted parking area, and is served by public car parks, likewise the area immediately around the Farncombe shopping area also has time limited parking restrictions. As such, the argument that commuter parking reduces the accessibility of the town to shoppers, hence stifling trade is not persuasive. Indeed it could be countered that parking restrictions which limit all day parking but allow time limited non-resident permit parking could actually increase the pollution and congestion as shoppers drive around to find the limited number of on-street parking within the proximity of the shopping areas.</p> <p>It is not the case that councils are powerless to improve bus services, council can indeed provide bus services, and the County does subsidise a number of 'non-viable' services which it is considered provide a service above cost.</p>	
14	Comments and Representations from Local Resident:		

	<p><b>Transport</b> – In parallel with the drafting of the neighbourhood plan, Godalming Cycle Campaign have been developing a proposal for a ‘Greenway’ to connect Guildford and Godalming and beyond to Milford. The Surrey County Council Officer for cycling, recommended it for adoption at both the Guildford and Waverly Local Committees (<i>post email note. The Guildford and Godalming Greenway was adopted by the local committees</i>) therefore, it would seem reasonable to make reference to the greenway in the neighbourhood plan.</p> <p>May I suggest the following wording: “New development must contribute to the implementation of that part of the Guildford Godalming Greenway that lies within the boundary of the neighbourhood plan area.”</p>	<p>As a project the Guildford Godalming Greenway is to be commended. However, the Community Infrastructure Levy (CIL) system in the Waverley area is planned be in place by January 2019. Fifteen percent of CIL contributions by developers will be due to the Town Council for use on local infrastructure Projects (increasing to 25% if a Neighbourhood Plan is adopted by referendum). There will be a number of infrastructure projects which could be supported by CIL contributions, for the Neighbourhood Plan to identify a single project above any other would fetter the proper the decision making process of which projects to support</p>	
15	<p>Comments and Representations from Local Resident: Resident comments are a repeat of those received at item 14.</p>	<p>As above.</p>	
16	<p>Comments and Representations from Local Resident:</p> <p><b>Paragraph 1.3:</b> Refers to the Plan period being 2015 to 2032. As top of this page is headed "Draft 3.2" I wonder if it is the most up-to-date version? (And with several other pages marked "Draft 3.2", are these the most up-to-date versions?).</p> <hr/> <p><b>Paragraph 1.13:</b> The word "consultations" reads oddly in this context... Do we need to include the word "exercises"?</p> <hr/> <p><b>Para.2.1</b> uses the words "with some 22.000 inhabitants". This must surely by now be an understatement!</p> <hr/> <p><b>Para.5.3:</b> Reference to `The English Chain Company`: Is this correct?</p> <hr/> <p><b>Para.7.4:</b> Wording used is that "17% of Godalming`s working residents commute by train", whereas paragraph 2.19 reads "Godalming has a comparatively</p>	<p>This resident is commenting on a previous draft and not the draft released for Regulation 14 Consultation. That said, were a correlation can be made between comments and Draft 3.3 appropriate responses will be provided.</p> <hr/> <p>Agreed</p> <hr/> <p>Whilst it may be the case that population of Godalming has grown, population figures are referenced to a moment in time and are provided by the National Statistics Office from 2011 census, which will be updated after the 2021 census.</p> <hr/> <p>English Chain no longer operate from these premises, in the same way that the World Wildlife Fund no longer operate from Panda House, The reference to their former names is as a reference point of change as these are the names that most residents will associate with the location.</p> <hr/> <p>There is an issue with Figure 2.6 from which para 2.19 is extrapolated in as much as the % total within the graph is only 75% therefore this table must be incorrect.</p>	<hr/> <p>Amend para 1.13 to delete the word ‘exercises’ para should read:</p> <p>“The working groups gathered information and evidence through a number of processes including online surveys and public consultations at the main town events; Godalming Town Show, Farncombe Fete, Spring Show, Farmers Markets, Spring and Summer Festival Markets.”</p> <hr/> <p>Delete Fig 2.6 and renumber remaining figures and update supporting text.</p> <p>Re-word para 2.19 to read:</p>

	<p>high proportion that travel by train - 12%...". I`m presuming these are two separate figures - one being working residents (figure from census) and the other more generally, but I don`t recognise from where the 12% figure comes...</p> <hr/> <p><b>Para 7.10:</b> Although I myself am author of the report of the Footways Group, I am puzzled by the point about "Turning across traffic on Bridge Road...". On reflection, this needs clarification and revised wording.</p> <hr/> <p><b>Page 69:</b> This page is an example of use of "WBC" and "Waverley Borough Council"; Is there an advantage in being consistent? However, what is most important, of course, is for the document to be intelligible - and not just to planners!</p> <hr/> <p><b>Proposed additional text:</b> The advent of the proposed Guildford-Godalming Greenway, because of its potential strategic importance, is worthy of inclusion with an additional text and policy.</p>	<hr/> <p>This point has been dealt within the responses to 13 above.</p> <hr/> <p>Use of abbreviations within a document such as this is acceptable, however, care should be taken to ensure a consistent approach.</p> <hr/> <p>The Guildford-Godalming Greenway is a scheme that encompassed areas outside of the NP boundary paragraph 7.13 – 7.18 set out the key points that will make the Godalming part of the Guildford-Godalming Greenway scheme work and Figure 7.2 identifies the proposed route to the greenway. As such the issues raised by the Guildford – Godalming Greenway are already covered within the NP.</p>	<p>2.19 With the area being well served by rail links to several major employment centres, with 17% of Godalming’s working residents commuting by train.</p> <p>2.20 With the 2011 census showing that 14% of work related journeys were either on foot or by bike, this is significantly greater than the 2% who travel by bus, but is very much lower than the 60% who travel by car either as driver or passenger.</p> <hr/> <p>Review final draft to ensure consistent adoption of abbreviations.</p>
<p>17</p>	<p>Historic England</p> <p>Historic England consider the GoFarNP provides a number of examples of good practice in neighbourhood planning and are happy to support the use of character areas as a means of guiding design across the neighbourhood pan area. We see the approach to shopfronts, views of importance and the hillsides and skylines as particularly important responses to the neighbourhood plan area's character and conservation areas. We also recognise that on-street parking has become a particular problem affecting the area's utility and character and that the plan seeks to address this in an appropriate manner.</p>		