

GODALMING & FARNCOMBE NEIGHBOURHOOD PLAN 2017-2032

QUALIFYING BODY RESPONSES TO INITIAL COMMENTS OF THE INDEPENDENT EXAMINER

1. The Qualifying Body of the Godalming & Farncombe Neighbourhood Plan 2017-2032 (GoFarNP) welcomes the initial comments from the Independent Examiner, Mr John Slater of John Slater Planning Ltd. In his report, Mr Slater highlighted a number of points upon which he requires clarification or further views and information from both the Neighbourhood Plan Group and Waverley Borough Council.
2. The Qualifying Body of the Neighbourhood Plan have set out below its response to the questions raised within the report, making reference to the section title and the paragraph number contained within the report.

Regulation 16 Consultation Responses – Paragraph 4

3. The Qualifying Body's document '*Godalming & Farncombe Neighbourhood Plan 2017-2032, Qualifying Body Responses to Regulation 16 Consultee Representations*' attached as Annex A, sets out its responses to the representations made by the Regulation 16 consultees and puts forward potential changes to the drafting of the plan that it wishes the Independent Examiner to consider.

Mapping Issues – Paragraph 5

4. The Policies Map shown on page 73, has been increased in scale and is now identified as five maps. The page numbering from page 73 onwards and the contents page should be amended accordingly. The new policies maps are shown at Annex B with the Inset Map shown at Annex C.

Policy GOD 1 – Paragraph 6

5. Para 4.10 of the plan highlights the expectation that older people in the market housing sector may wish to downsize and that the downsizing is to two or three bedroom properties rather than one-bedroom properties. The West Surrey Strategic Housing Market Assessment (SHMA) indicates that the need for nearly three quarters of market dwellings and over 50% of affordable dwellings in Godalming is for two or three bedroom properties, therefore there is alignment with the evidence. In addition, GOD1 does not exclude the requirement for the delivery of 1 bedroom units.

Additionally, clause B of Policy GOD1 regarding extra care provision is seen as one of the main ways that 1-bed properties will be provided, which meets the need of the ageing population. Paras 4.6-4.9 identify that there is this growing demand for extra care housing and most of this will be 1-bed provision.

6. The Qualifying Body acknowledges in its response to Waverley Borough Council's Regulation 16 representations that the wording of the policy GOD1(A) may be too tightly drawn in regards to the housing assessment and have suggested that the wording be changed to that shown below, which would allow for adjustments in the future to reflect the changing needs.

Policy GOD1 (A)

*"All new residential developments (Use Class C3) 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)~~ **most up to date area Strategic Housing Market Assessment**"*

Policy GOD 2 – Paragraph 8

7. In considering its view relating to GOD2: Small-Scale Employment Development, and its relationship with the Local Plan Policy EE1, GOD2 covers development both within the settlement boundary (first bullet point) and outside it (second bullet point). As such, Local Plan Policy EE1(d) is relevant to the second bullet point. Limited commercial development proposals in the Green Belt which would involve the redevelopment of redundant brownfield sites are, within reason, considered by the National Planning Policy Framework (NPPF) to represent exceptions and are therefore permissible. Also, Local Plan Policy EE1 refers to ‘well designed buildings’ which could mean new buildings, so the issue is whether the GoFarNP needs to include this if it is already in the Local Plan.

If it is felt that an amendment to the wording of Policy GOD2 to specifically allow this would be beneficial, the Qualifying Body would be supportive of the amendment.

Policy GOD 12 – Paragraph 9

8. The Green Corridors are indicated by the green arrows shown in Figure 8.1 and as described in Table 8.1. However, the Qualifying Body acknowledges the Independent Examiner’s concerns regarding the clarity of the mapping of the Green Corridors shown in Figure 8.1 and have worked to refine the routes as shown in the new policy maps shown at Annex B.

Policy GOD 15 – Paragraph 10

9. Reference in Paragraph 8.26 to another emerging neighbourhood plan relates to the [Knightsbridge Neighbourhood Plan¹](#) which has since been ‘made’. All the relevant documents can be found here: <http://www.knightsbridgeforum.org/>.² The relevant policy in the Knightsbridge Neighbourhood Plan is KBR34 (Healthy Air) and the evidence supporting it is in the [Knightsbridge Evidence Base Document](#).³ This refers to a [legal opinion⁴](#) provided by Robert McCracken QC. A raft of other evidence is listed [here⁵](#) and it may also be instructive to look at the Examiner’s report [here⁶](#) (at the time of examination, the Healthy Air policy was KBR35).

Policy GOD 15 – Paragraph 11

10. Having regard to the information set out below and Waverley Borough Council’s stated priority for improvements to air quality within the Borough in general, the Qualifying Body does not believe that that the policy should be restricted to areas where there is an existing air quality issue. The purpose of the plan-making process is to comprehensively address issues that are expected to be threats over the lifetime of the plan – to address the symptoms – not to simply wait until a problem has reached a point of illegality and then seek to find the cure.
11. In considering whether air quality policies should be restricted to Air Quality Management Areas (AQMA) or other areas with existing air quality issues, the Qualifying Body would wish to cite the [WBC 2016 Air Quality Annual Status Report \(ASR\) 2018 Reissue⁷](#) report which showed that the annual mean concentration of NO₂ in the Godalming AQMA has been generally increasing every year excluding 2014 and WBC’s statement of 2003 that said:

¹http://www.knightsbridgeforum.org/media/documents/knp_made_version_december_2018_131218_website.pdf

² <http://www.knightsbridgeforum.org/>

³ http://www.knightsbridgeforum.org/media/documents/kebd_december_2018_141218_website.pdf

⁴http://www.knightsbridgeforum.org/media/documents/knf_robert_mccracken_qc_opinion_air_quality_directive_and_planning_signed_061015.pdf

⁵ <http://www.knightsbridgeforum.org/planning/evidence/>

⁶ http://www.knightsbridgeforum.org/media/documents/knp_examiner_report.pdf

⁷ http://www.waverley.gov.uk/downloads/file/5995/2016_air_quality_annual_status_report

“rather than simply focus on tackling the issues identified in these three areas [AQMA’s] the document seeks to take a broader approach – raising the awareness of air quality throughout the Borough of Waverley.”

12. The geography and constraints of the road network of Godalming is such that a significant proportion of vehicle movements have no alternative route other than through the AQMA, therefore major developments anywhere within the Neighbourhood Plan area will inevitably mean more movements through the AQMA and hence a decrease in air quality. This is why a policy should not just look solely at the AQMA or areas with existing air quality issues in isolation.
13. This position is further supported by Waverley Borough Councils’ own findings on Public Health as contained in its report: [Factors Affecting Health Inequalities in Waverley – A Review Report of the Community Wellbeing Overview & Scrutiny Committee July 2018.](#)⁸

The WBC Executive resolved on 10 July 2018 to accept the recommendations contained within the report, one of the most important being that:

“Waverley to take public health outcomes into account in all council policies and decisions, even though the Council has no statutory responsibility for public health.”

In light of this resolution, Paragraph 2.6 of the report is pertinent to this discussion:

“Planning Policy has a significant influence over the built and natural environment, e.g. in neighbourhood design, housing, healthier food access, the natural and sustainable environment and transport infrastructure. Planning Policy can improve healthy life expectancy of the local population by focusing on three strategic areas:

- *Improve Air Quality*
- *Promoting Healthy Weight*
- *Improving Older People’s Health”*

Policy GOD 15 – Paragraph 12

14. The legal limit of 40 micrograms per cubic metre (ug/m³) are established in the [UK Air Quality Standards Regulations 2010](#)⁹ and [EU Directive 2008/50/EC](#)¹⁰ on ambient air quality and cleaner air for Europe (which have been in legislation since 1999 and were supposed to be achieved by 1 January 2010).
15. The Qualifying Body wishes to make clear that the starting point for any consideration of GOD15 should be that development is ‘encouraged’ not ‘required’ to meet its requirements. However, the current Government policy to address the illegal levels of air pollution that have been identified in many locations across the UK has been established by the High Court to be unlawful. The Government’s draft strategy to address this matter requires local authorities to devise appropriate strategies that deal with air pollution. It is therefore axiomatic that local authorities should be working hard to develop these strategies and also the approach to monitoring them once in place. In this regard, it is not considered justified that a policy can be said to fail to meet the Basic Conditions – and it is noted that Waverley Borough Council has not indicated in what way GOD15 does not meet the Basic Conditions – because the local planning authority has yet to devise an approach to assessing matters which Central Government is expecting them so to do.

⁸ <https://modgov.waverley.gov.uk/documents/s24828/Health%20Inequalities%20Scrutiny%20Review.pdf>

⁹ <https://www.legislation.gov.uk/ukxi/2010/1001/contents/made>

¹⁰ <https://www.eea.europa.eu/policy-documents/directive-2008-50-ec-of>

16. Regarding whether there should be a minimum threshold as to what developments should be considered against this policy, the burden of ensuring that development does not have a detrimental effect on human health is considered to be a fundamental part of any consideration of whether it represents sustainable development. No representations have been made by any parties to suggest that this would make development demonstrably unviable.
17. Development is encouraged to do this rather than required to, therefore the extent to which proposals include measures which can demonstrate it will be 'air quality neutral' should be proportionate. Smaller developments are less likely to have a significant impact, and particularly a single dwelling. National Planning Practice Guidance addresses the questions 'How detailed does an air quality assessment need to be?' (Paragraph: 007 Reference ID: 32-007-20140306) and 'How can an impact on air quality be mitigated?' (Paragraph: 008 Reference ID: 32-008-20140306) and therefore provides assistance in this regard to applicant and decision maker. For major development, GOD15(C) is clear that an air quality assessment would be required and therefore the local planning authority should be capable of interpreting this within the context of the requirements of the policy.

Policy GOD 15 – Paragraph 14

18. The Qualifying Body does not consider that Policy GOD 11 and GOD 15 are inconsistent. GOD11 encourages provision of Electrical Vehicle Charging Points (EVPs) for all development whereas GOD15 requires provision on major developments where such provision is unlikely to have an impact on viability. As such the Qualifying Body feels that there is a notable difference. However, the Qualifying Body does agree with WBC that the restriction on development size should be amended to reflect the requirement is for major developments as defined by the Town and Country Planning (Development Management Procedure) Order)(England 2010 [(Wales) 2012). Additionally, the Qualifying Body considers that in order to maintain consistency across policies, the amendment should refer to the minimum parking standards set out in policy GOD6. As such the Qualifying Body suggests an amendment of Policy 15(E) to read:

Policy GOD15 (E)

*"Mitigation proposals for **major** developments ~~in excess of 50 dwellings or 5000m²~~ will be required to include the provision of Electric Vehicle Charging Points (EVPs). **Such development will be still be expected to meet the minimum parking standards in Policy GOD6.**"*

Policy GOD 17 – Paragraph 15

19. Figure 9.1: Location of Play and Youth facilities in Godalming Parish has been amended as suggested and is shown at Annex D.

GODALMING & FARNCOMBE NEIGHBOURHOOD PLAN
QUALIFYING BODY RESPONSES TO REGULATION 16 CONSULTEE REPRESENTATIONS

1. Godalming Town Council, as the Qualifying Body of the Godalming & Farncombe Neighbourhood Plan (GoFarNP), welcomes the opportunity provided by the Independent Examiner to put forward its comments relating to the responses received from the Regulation 16 consultees. It also welcomes the opportunity to put forward for consideration by the Independent Examiner any possible changes it would like the examiner to consider in response to the Regulation 16 consultation.
2. The list of comments published on the Waverley Borough Council's website can be viewed at <http://consult.waverley.gov.uk/consult.ti/GoFarNP/listRepresentations> and the individual consultees have been allotted a Comment Identity Number (Comment ID), in the text below the consultees have been identified by both the consultee's organisation name and the Comment ID number.

Comment ID No 1 – Waverley Borough Council (WBC)

3. In response to WBC comment that the Neighbourhood Plan (NP) contains a number of designations which are being reviewed in the emerging Waverley Local Plan Part 2 (LLP2), the GoFarNP had been written in the expectation that the LLP2 would have been subject to its original timetable. However, in light of the delay announced by WBC it is suggested by the Qualifying Body that clarification be given to these designations and that a statement is made within the NP and that a new Paragraph 1.1 is inserted with associated amendment to the numbering of the follow on Paragraphs.

Suggested New Paragraph 1.1

In preparing the Godalming & Farncombe Neighbourhood Plan, the designation of the following areas; the Godalming Settlement Boundary, the Godalming Town Centre Boundary, Primary Shopping Area Boundary and the Godalming Hillsides Boundary are all designated by the Godalming & Farncombe Neighbourhood Plan as shown in the Policies Maps., However, it should be noted that the origin of these designations/boundaries is those set out in the LLP2 Preferred Option Document dated May 2018.

4. In relation to the Farncombe Local Centre Boundary, the Qualifying Body notes the comment that the reason for the minor differences between the boundaries as set out in the LLP2 preferred options document and the GoFarNP should be explained. Therefore, it is suggested that a new Paragraph 5.26 be inserted before Policy GOD4.

Suggested New Paragraph 5.26

The Farncombe Local Centre Boundary as designated by the Godalming & Farncombe Neighbourhood Plan and shown in the Policies Maps, is derived from the boundary set out in the LLP2 Preferred Option Document dated May 2018. However it should be noted that the southern edge of the boundary in St John's Street has been extended to include the existing retail units and the parking areas in Owen Road have been excluded in order to preserve the parking capacity in the area.

5. The Qualifying Body accepts the comment made in regard to Paragraph 4.13 and suggests that Paragraph 4.13 be amended to read:

Suggested Amended Paragraph 4.13

Policies that support self or custom built dwellings can help to support delivery of affordable housing and would be strongly supported.

6. The consultee is correct that Policy GOD1(A) should read (Use Class C3) and it is therefore suggested that the text be amended to reflect this typographical error.
7. The Qualifying Body accepts the comment regarding the reference to the November 2015 Strategic Housing Market Assessment (SHMA) within the policy may cause the policy to become outdated should new evidence on housing mix needs come forward. However, the Qualifying Body does not accept the premise that a policy on the housing mix within the neighbourhood planning area is not necessary. The Borough of Waverley is made up of four main, but distinct settlements plus a rural hinterland, with each of those settlements having their own character and attractiveness to different types of households. As such, the Qualifying Body would contend that a fundamental role of the Neighbourhood Plan is to reflect the housing mix needs of its own area whilst having regard to the strategic, borough-wide requirement. The Qualifying Body believes that policy GOD1 is in general conformity with the Local Plan. In this regard it is also considered to be in keeping with the spirit and intent of the Neighbourhood Planning Regulations, taking account of Government Guidance which states that:

“Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.”

8. The housing mix as indicated in GoFarNP Policy GOD1 has already been reflected in the recent approved application for the Ockford Park development (WA/2018/1239), which is the single largest development within the GoFarNP area for over 30 years. However, over the lifetime of the Plan and based on sites in the Local Plan that have come forward already, most development in Godalming is expected to be windfall which, by its nature, is not being directly relied upon by the Local Plan to deliver the appropriate mix of the overall housing requirement. The intention therefore is to ensure that the occasional ‘larger windfall’ which may come forward focuses on contributing towards delivering Godalming’s needs rather than those explicitly of the Local Plan, although in practice the difference is not significant.
9. Policy GOD5(C) –The Building for Life 12 criteria (BFL12) is considered by the Qualifying Body to set out 12 questions that should always be taken into consideration when assessing the merits of any planning application for residential developments. However, it should be noted that the policy ‘encourages’ BfL12 rather than ‘requires’ it. With the criteria already established by BfL12, it should be easy to address what WBC expects of an application through pre-app discussions. Ensuring design quality is a matter which the Local Plan seeks and BfL12 is an effective and clear tool for assessing that. As such, the Qualifying Body sees it as helpful to WBC in assessing developments for design quality.
10. Policy GOD6(B) – Minimum off street parking provision. The GoFarNP Policy GOD6, does not automatically rule out residential development within the Godalming Town Centre Area. However, whereas WBC Parking Guidelines are borough-wide requirements, the GoFarNP evidence shows that Godalming, and in particular the historic town centre and adjacent area, has a unique and more acute set of issues when it comes to the impact of on-street parking. Policy GOD6 sets out minimum parking provision as opposed to providing guidelines, the Qualifying Body believes this will provide protection against inappropriate development within the Godalming Town Centre Area.
11. Policy GOD6 does recognise that there may be exceptional circumstances which justify development that does not meet the minimum off street parking criteria set out in Policy GOD6(B), this is catered for within Policy GOD6(C). The Qualifying Body feels GOD6(C)

avoids the concerns that WBC has expressed, whilst meeting the concerns of the community and places the onus of justification for exception on the developers.

12. Policy GOD15 – As stated by WBC there have been a number of discussions about this policy. Dealing with the specific points raised in the WBC Regulation 16 representation, the Qualifying Body would wish to add the following to that already set out in the submitted Neighbourhood Plan and accompanying Consultation Statement, particularly Annex H - Specific representations regarding Policy GOD15 Air Quality:

- a. *We are uncertain as to how applicants could demonstrate compliance with, and how officers would assess part B, C, D or E of the policy.*

The Qualifying Body considers it important to note that the starting point of any discussion to be that development is 'encouraged' not 'required' to meet these requirements. However, the current Government policy to address the illegal levels of air pollution that have been identified in many locations across the UK has been established by the High Court to be unlawful. The Government's draft strategy to address this matter requires local authorities to devise appropriate strategies that deal with air pollution. It is therefore axiomatic that local authorities should be working hard to develop these strategies and also the approach to monitoring them once in place. In this regard, it is not considered justified that a policy can be said to fail to meet the Basic Conditions – and it is noted that Waverley Borough Council has not indicated in what way GOD15 does not meet the Basic Conditions – because the local planning authority has yet to devise an approach to assessing matters which Central Government is expecting them so to do.

GOD15 is clear that major development will require an air quality assessment in order to demonstrate compliance with the policy. In this regard, this is a clear and well-established method of assessing the air quality impact of a proposed development.

- b. *If this policy applies to all development the Council considers it could be highly restrictive. We would suggest that this policy could cause a significant burden for applicants and officers when submitting and determining applications, regardless of whether proposals are likely to have a significant impact on air quality and the environment.*

The comments above apply equally to this issue. For applicants – that are again encouraged to do this rather than required to – the burden of ensuring that development does not have a detrimental effect on human health is considered to be a fundamental part of any consideration of whether it represents sustainable development. No representations have been made by any parties to suggest that this would make development demonstrably unviable.

GOD15(D) relates to mitigation matters. Paragraph 124 of the 2012 National Planning Policy Framework (NPPF) is clear that "Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas." In this regard, it is quite clear that local planning authorities should be able to assess such affects, cumulative or otherwise.

- c. *We consider that a test of "at least air quality neutral" seems very difficult to assess, and pass. For instance, could one new house really be expected to demonstrate air quality neutral?*

Again, development is encouraged to do this rather than required to, therefore the extent to which proposals include measures which can demonstrate it will be 'air quality neutral' should be taken into account. Smaller developments are less likely to have a significant

impact, and particularly a single dwelling. National Planning Practice Guidance addresses the questions 'How detailed does an air quality assessment need to be?' (Paragraph: 007 Reference ID: 32-007-20140306) and 'How can an impact on air quality be mitigated?' (Paragraph: 008 Reference ID: 32-008-20140306) and therefore provides assistance in this regard to applicant and decision maker. For major development, GOD15(C) is clear that an air quality assessment would be required and therefore the local planning authority should be capable of interpreting this within the context of the requirements of the policy.

13. Policy GOD11 and Policy GOD15 – inconsistency – The Qualifying Body agrees that the requirements between GOD11 and GOD15(E) are inconsistent and agrees with WBC that the wording of GOD15(E) should be amended. However, the Qualifying Body considers that in order to maintain consistency with the GoFarNP the amendment should refer to the minimum parking standards set out in policy GOD6. As such the Qualifying Body suggests an amendment of Policy 15(E) to read:

Suggested Amended Policy 15(E)

*Mitigation proposals for **major** developments ~~in excess of 50 dwellings or 5000m²~~ will be required to include the provision of Electric Vehicle Charging Points (EVPs). **Such development will still be expected to meet the minimum parking standards in Policy GOD6.**"*

14. WBC expressed a concern that Paragraph 8.24 as written could be considered misleading, the Qualifying Body would not wish to cast doubt on its interpretation of WBC's data sets, therefore in order to avoid confusion over air quality targets agrees with the WBC suggested amendment to the text of Paragraph 8.24.

Suggested Amended Paragraph 8.24

Air pollution in parts of the Godalming & Farncombe Neighbourhood Plan Area is significant and potentially worsening. There is an existing Air Quality Management Area (AQMA) along Flambard Way and part of Ockford Road.

The most recent Waverley Updating and Screening Assessment¹ report determined NO₂ concentrations monitored at the Godalming AQMA has generally been steadily increasing since 2011, with 2014 results being an exception. It also found that, although this local monitoring location is outside the AQMA, the annual national air quality objectives for nitrogen dioxide (NO₂) at Holloway Hill, Godalming, in proximity to the junction with Flambard Way, was exceeded. Additionally exceedances were recorded a total of 25 times at non-automatic monitoring points in Godalming, with four locations having exceeded air quality objectives for NO₂ on three occasions and one monitoring point location having an exceedance on four occasions.

Comment ID No 2 – Frith Hill Area Residents' Association

15. The Qualifying Body welcomes the Association's positive comments and general support for the GoFarNP. The comments below deal with the issues the Qualifying Body wishes to address or add to the comments made by the Association. These are addressed below.
16. Paragraph 5.12 – Whilst the Chamber of Commerce offers training and mentoring to new businesses and there are other organisations who can offer support and advice, the Neighbourhood Plan is a planning document and may not be best placed for the advancement of this type of issue.

¹Waverley Borough Council 2016 Air Quality Annual Status Report (ASR) – 2018 Reissued In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management February 2018.

17. Paragraph 6.18 – The Qualifying Body does not necessarily agree that it is important that traffic moves freely in both directions, the example of Chalk Road is a case in point. The residential parking is of itself a traffic calming measure to the approach to the railway bridge that in reality is only able to provide passage through the arch in one direction at a time. However, that is not to take away from the issues raised concerning inappropriate parking and lack of enforcement.

Comment ID No 3 – CBRE Limited (Planning)

18. Policy GOD9, GOD12 & GOD16 – The Qualifying Body notes CBRE’s comments and broad support for these policies.
19. Policy GOD1 – Housing Mix – this issue has been addresses see Paragraphs 6 and 7.

Comment ID No 4 – Natural England

20. The Qualifying Body thanks the consultee for its comments.

Comment ID No 5 – Historic England

21. Objectives – The Qualifying Body notes the comments regarding the objectives shown in Paragraph 3.3 – Heritage and Design. The Qualifying body would not object to Historic England’s suggestion and suggests the following objectives be added to the ‘Heritage and Design’ section of the ‘Godalming & Farncombe Neighbourhood Plan Objectives’ (it should be noted that a pagination error has been noted and that the page in question should be page 17 not page 73 as marked).

Suggested additional objectives to Paragraph 3.3 Heritage and Design

- *To conserve and enhance the significance of heritage assets in the Neighbourhood Plan area.*
 - *To conserve the special interest, character and appearance of the Conservation Areas.*
22. The Qualifying Body does not support the addition of an objective to “improve access to, understanding and appreciation of heritage assets in the Parish” on the grounds that the Neighbourhood Plan cannot influence access to privately owned heritage assets.
23. Whilst the Qualifying Body is aware of the Historic Grade II Park & Garden (Westbrook), it is also aware of 227 listed buildings and as such has made a decision only to specifically mention those listed as Grade 1. Likewise the Qualifying Body does not wish to duplicate the issues covered by Chapter 5 of the LLP2 Preferred Option Document dated May 2018 and its proposed policies currently designated as DM20 – Conservation Areas and DM23 Historic Landscapes and Gardens. It is considered that these policies along with DM22 – Non-designated Heritage Assets and DM24 – Archaeology, safeguards these local assets and provides the required information to guide decision making processes.
24. The Qualifying Body welcomes Historic England’s comments on the character area approach and support of GOD5 and GOD7. In regards to GOD8, the Qualifying Body feels that the ‘setting of the panoramic view’ is inseparable from the view and without the setting of the panoramic view the view does not exist.

Comment ID No 6 – Godalming Cycle Campaign

25. Movement Routes – Paragraphs 7.19 – 7.23. Whilst the Qualifying Body has endorsed the Guildford Godalming Greenway, which is also supported by the Waverley Borough Infrastructure Delivery Plan, the Movements Route section of the GoFarNP Paragraph 7.19 –

7.23 sets out the guiding principles as opposed to the specific details and as such the Qualifying Body would not wish to limit the GoFarNP to a specific solution as alternative options may emerge during the life of the plan. Therefore, the Qualifying Body, whilst supportive of the Greenway Scheme, would not wish to insert the additional Paragraph suggested in the consultee's comments.

26. However, regarding Paragraph 7.23, the Qualifying Body would wish to see an amendment to the text for it to read:

Suggested Amended Paragraph 7.23

Where improvements are necessary, contributions will be sought either through Section 106 agreements or Community Infrastructure Levy (CIL) contributions as appropriate, along with any available grants or match funding from other sources.

27. The Qualifying Body does not agree that Paragraph 7.6 and Paragraph 7.32 are contradictory. 7.32 should be considered in conjunction with Paragraphs 7.30 and 7.31 and although improvements to pathways, cycle ways and the integration of public transport should be seen as significantly important aspects of the need to provide different options than simply providing more car parking space, Paragraph 7.32 is right to acknowledge that the need for additional parking at the railway stations cannot be ignored. What Paragraph 7.32 sets out to address is how any additional capacity is used? Some parking controls in neighbouring streets around Farncombe Station are already in place and whilst this has eased the pressure within the immediate vicinity, the need for commuter parking has not been resolved, but just relocated to other nearby roads.
28. The Qualifying Body notes the suggestions surrounding amendments to Paragraph 7.30 and would partly agree. However, whilst it would agree that 'parking at these stations is unlikely to be able to meet the needs' whether 'parking at these stations is never likely to be sufficient for needs' is a moot point. It could be argued that as technology changes, especially in the field of driverless vehicles, the economics and thus imperative for private ownership of a vehicle which spends the majority of its life parked up could significantly alter future private car ownership and transport needs. As such the Qualifying Body would suggest that a re-worded Paragraph 7.30 should read:

Suggested Amended Paragraph 7.30

With the high levels of out-commuting by local residents exacerbated by the significant number of people driving to use the stations in Godalming and Farncombe, parking at these stations is unlikely to be able to meet the need. As a result, people parking in the surrounding streets causes congestion and difficulties for pedestrians and cyclists throughout the day. With Godalming and Farncombe being two of the closest stations to the anticipated strategic developments at Dunsfold Park and Milford, there is a serious risk that this situation will worsen over the plan period.

29. Policy GOD10 – amendment. As it could be argued that electric vehicles are an environmentally sustainable mode of transport the Qualifying Body could support an amendment to GOD10(i.) (although for consistency the Qualifying Body would also suggest that the points within GOD10 are re-categorised as A, B, and C., as opposed to i, ii, and iii).

Suggested Amended Policy10(i.)

Improved access to stations for those using environmentally sustainable modes of transport.

Comment ID No 7 – Surrey Wildlife Trust

30. The Qualifying Body welcomes the positive comments from the Surrey Wildlife Trust.

Table of Possible Changes Put Forward by the Qualifying Body

Descriptor	Proposed New Text/Change
New Paragraph 1.1 (and associated renumbering of follow on Paragraphs)	<i>In preparing the Godalming & Farncombe Neighbourhood Plan, the designation of the following areas; the Godalming Settlement Boundary, the Godalming Town Centre Boundary, Primary Shopping Area Boundary and the Godalming Hillside Boundary are all designated by the Godalming & Farncombe Neighbourhood Plan as shown in the Policies Maps., However, it should be noted that the origin of these designations/ boundaries is those set out in the LLP2 Preferred Option Document dated May 2018.</i>
Additional objectives to Paragraph 3.3 Heritage and Design	<i>Insert the following bullet points in the Heritage and Design section.</i> <ul style="list-style-type: none"> • <i>To conserve and enhance the significance of heritage assets in the Neighbourhood Plan area.</i> • <i>To conserve the special interest, character and appearance of the Conservation Areas.</i>
Correction to page numbering	<i>Correct the page numbering – page following 16 currently reads page 73, correct to read page 17.</i>
Amended Paragraph 4.13	<i>Policies that support self or custom built dwellings can help to support delivery of affordable housing and would be strongly supported.</i>
Amended Policy GOD1(A)	<i>All new residential developments (Use Class C3) 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 most up to date area Strategic Housing Market Assessment.</i>
New Paragraph 5.26	<i>The Farncombe Local Centre Boundary as designated by the Godalming & Farncombe Neighbourhood Plan and shown in the Policies Maps, is derived from the boundary set out in the LLP2 Preferred Option Document dated May 2018. However it should be noted that the southern edge of the boundary in St John's Street has been extended to include the existing retail units and the parking areas in Owen Road have been excluded in order to preserve the parking capacity in the area.</i>
Amended Paragraph 7.23	<i>Where improvements are necessary, contributions will be sought either through Section 106 agreements or Community Infrastructure Levy (CIL) contributions as appropriate, along with any available grants or match funding from other sources.</i>
Amended Paragraph 7.30	<i>With the high levels of out-commuting by local residents exacerbated by the significant number of people driving to use the stations in Godalming and Farncombe, parking at these stations is unlikely to be able to meet the need. As a result, people parking in the surrounding streets causes congestion and difficulties for pedestrians and cyclists throughout the day. With Godalming and Farncombe being two of the closest stations to the anticipated strategic developments at Dunsfold Park and Milford, there is a serious risk that this situation will worsen over the plan period.</i>

Amended Policy GOD10	<p><i>POLICY GOD10: PARKING AT GODALMING AND FARNCOMBE STATIONS AND GODALMING TOWN CENTRE CAR PARKS</i></p> <p><i>Proposals that address the following will be supported:</i></p> <p><i>Improved access to stations for those using environmentally sustainable modes of transport.</i></p> <p><i>Redesign of the forecourts at Godalming and Farncombe railway stations so that buses can stop outside the entrance and so that it creates an environment suitable for all users.</i></p> <p><i>Increases in the capacity of car and bicycle parking which will demonstrably serve the needs of those using shops and services in the town centre.</i></p>
Amended Paragraph 8.24	<p><i>Air pollution in parts of the Godalming & Farncombe Neighbourhood Plan Area is significant and potentially worsening. There is an existing Air Quality Management Area (AQMA) along Flambard Way and part of Ockford Road.</i></p> <p><i>The most recent Waverley Updating and Screening Assessment² report determined NO₂ concentrations monitored at the Godalming AQMA has generally been steadily increasing since 2011, with 2014 results being an exception. It also found that, although this local monitoring location is outside the AQMA, the annual national air quality objectives for nitrogen dioxide (NO₂) at Holloway Hill, Godalming, in proximity to the junction with Flambard Way, was exceeded. Additionally, exceedances were recorded a total of 25 times at non-automatic monitoring points in Godalming, with four locations having exceeded air quality objectives for NO₂ on three occasions and one monitoring point location having an exceedance on four occasions.</i></p>
Amended Policy 15(E)	<p><i>Mitigation proposals for major developments will be required to include the provision of Electric Vehicle Charging Points (EVPs). Such development will still be expected to meet the minimum parking standards in Policy GOD6.</i></p>

² Waverley Borough Council 2016 Air Quality Annual Status Report (ASR) – 2018 Reissued In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management February 2018.