

Appendix 11 c - Haslemere Neighbourhood Plan – Regulation 14 Consultation Representations, Response and Suggested Action

WBC No.	Representations, comments and issues raised – Waverley Borough Council	Response	Suggested actions
1	<p>P.13 Delivering the required housing numbers It would be useful to set out the specific housing supply figures that you refer to. Policy ALH1 of Local Plan Part 1 (LPP1) states that each parish is allocated a minimum number of homes. Although it is appreciated that the Haslemere community has expressed an opinion that no more than the allocated 990 homes should be built, as it stands, the principle of a maximum number of homes is not in general conformity with the strategic policies of the Waverley Local Plan.</p>	<p>The statement on p.13 of the Regulation 14 NP reflects the community's response to the housing consultation. Whilst it states that the NP does not propose that more homes are built than the 990 allocated in the Local Plan, it is recognised that 990 is a minimum.</p>	No change
2	<p>P.13 Setting a Settlement Boundary Although it is not named as a "settlement boundary", the 2002 Waverley Local Plan clearly differentiates between land within the built up area which is shown as white and land outside it in the Green Belt and countryside beyond the Green Belt. Grayswood currently has a settlement boundary under the adopted 2002 Local Plan.</p>	<p>The emerging Local Plan part 2 defines settlement boundaries for the NP area, as the NP will possibly be adopted before the Local Plan it is necessary to define the settlement boundaries in the NP so that the areas the policies apply to can be identified.</p>	No change
3	<p>P.13 Preserving the Character of the Town It is welcomed that the NP makes it clear that the Haslemere Design Statement (HDS) is a material planning consideration. However, it is suggested that the status of the document is made clearer given Policy H 7.1 states that all development must comply with the HDS i.e. the HDS is not a supplementary planning document but was adopted by Waverley Borough Council as a material consideration in the determination of planning applications on 17th July 2012. It is also suggested that greater reference is made to the historic environment within this section and on other relevant NP policies.</p>		Added date Haslemere Design Statement was adopted
4	<p>P.15 Protecting the local environment Very little is stated about the pervading landscape designations (for instance there is no mention of SCC landscape character assessments - Hindhead Wooded Greensand and Chiddingfold Wooded Low Weald) and how landscape should be assessed/conserved. It is recognised that the NP seeks to re-use brownfield sites within the designated settlement boundaries and avoid development outside them. However, if development is required to take place outside the settlement boundaries or on rural brownfield land then the impact of it on the landscape becomes even more important. This part of West Surrey is a landscape meeting point of the well wooded lowland and the heathland and woodland of the higher ground to the north. Therefore, it is suggested that it would be beneficial if the NP encapsulated more about the beauty and generally wooded landscape character of the NP area and what expectations are for its conservation and enhancement (beyond protecting national biodiversity targets/habitat) in respect off all development.</p>		Information added to this section
	Policy H1: Designation and Purpose of the settlement boundaries		
5	<p>P.19 H1.2 Waverley considers that this policy is too restrictive by saying that there is a presumption against development outside the settlement boundaries and goes beyond the NPPF with regard to policies for the countryside and for certain types of development in the Green Belt.</p>	<p>Details of the exceptions where building on designated land is permitted under the NPPF has been added to the Context.</p>	Context wording altered

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6	<p>P.19 - H1.3</p> <p>It is for either Local Plan Part 2 or the Neighbourhood Plan to make any additional housing allocations needed to meet the Part 1 housing requirement. Currently we are proceeding on the basis that the allocations will be in Local Plan Part 2. It is appreciated in your plan that you do not contradict this and are not seeking to allocate sites. However, NP Policy H1 essentially adopts a formal settlement boundary that does not normally permit development on AONB or AGLV sites unless an amount of housing development has not been met by a specific time which will trigger the release of sites in these areas. It is also appreciated that you caveat the plan by saying that if the delivery of homes falls short then Waverley may need to review and set new settlement boundaries in Local Plan Part 2. However, the draft neighbourhood plan seeks to direct the scope and content of Local Plan Part 2 through this policy. Whilst Waverley wants the local community to be involved with the process of selecting appropriate sites for development through the preparation of the Borough Local Plan, it does not consider that it is the role of a Neighbourhood Plan Policy to direct what allocations should be made in a Borough Local Plan where the NP chooses not to carry out site allocations.</p> <p>The Council is also of the view that the inclusion of this policy may also necessitate the requirement for a Strategic Environmental Assessment and a Habitats Regulations Assessment for the NP given that it seeks to direct Local Plan Part 2.</p> <p>Notwithstanding our objections to the policy itself, it is unclear what the justification is for the specific trigger points set out in Table 1 for releasing sites in the AONB/AGLV. It is suggested that reasons are given for the specific dates and numbers of homes set out, as well as what source of evidence should be relied on.</p>	<p>Responses to the Regulation 14 consultation indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.</p>	<p>Policy removed.</p>
7	<p>P.19 H1.5</p> <p>It is appreciated that the objective is to use land within settlements efficiently, particularly in close proximity to the station and facilities. However, requiring specific housing densities in areas based on numbers needs to also take into account the characteristics of an area to avoid inappropriate development. For example, there is a lack of reference to the historic environment within this policy where the extenuating circumstances of densities on threshold?</p> <p>It is appreciated that a plan of the 1 km zone is set out in supporting evidence to the NP, but if this is to be policy then the plan needs to be set out in the NP itself to provide clarity.</p>	<p>These were views also expressed in many consultation responses. The policy wording has been altered to provide more flexibility in its application and reference made in the context and reasoned justification to the Local Plan Haslemere Hillside and Conservation Area policies.</p>	<p>Policy wording amended</p>

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	Policy H2: Development outside the settlement boundaries on existing built land		
8	<p>P.21 H2</p> <p>This policy appears to relate to all development on all land outside the settlement boundary. If so, it does not reflect the importance of the different designations and objectives that relate to this land. Whilst AGLV and countryside beyond the Green Belt have a greater level of protection than land within a settlement boundary, they are not national designations like an AONB and a Green Belt. Furthermore the AONB is protected for its natural beauty whereas the purpose of including land in the Green Belt is its openness and permanence. On this basis the restriction to development set out in the NP policy that applies to all land outside settlement boundaries is more restrictive than imposed by the NPPF and is not commensurate with the planning designation. If however, this approach is to be taken then there has to be supporting evidence to justify it. Similarly, it needs to be made clearer what type of development this policy relates to and the specific requirements, including the maximum 40% of the baseline footprint, must be justified by evidence.</p> <p>As currently drafted there seems to be some conflict between this policy and Policy H 1.2 which states there will be presumption against the development of land that lies outside the settlement boundaries.</p>	<p>This policy has been combined into H1.2</p> <p>The restrictions on the size of the development have been removed as the NPPF provides sufficient guidance.</p>	<p>Policy wording amended.</p>
	Policy H3: Sustainable Development outside the settlement boundaries and inside on designated land		
9	<p>P.22-23 Context and H3</p> <p>The Council supports the desire to deliver sustainable development in Haslemere and elsewhere in the Borough. This matter is already covered in policies in the adopted Local Plan Part 1 and in the emerging Local Plan Part 2. We are looking at how those policies can further support the matter, particularly following the Council's declaration of a Climate Emergency. However, there is a risk that there will be some confusion with overlapping policies.</p> <p>The policy sets out higher standards for development outside a settlement rather than within. There needs to be justification for the difference between the areas. It needs to be clear what the sustainable requirements are for sites within settlement boundaries are, particularly as most of the development is planned for here. It is also not clear what the standards would be for previously developed land outside a settlement boundary. Evidence should include the testing of its impact on development viability. It is important that the imposition of standards and requirements through policy is not used as a method to encourage or deter development in specific locations through their viability where policy objectives should be achieving this.</p> <p>It is also noted that the policy contains a number of sustainable design principles, which while welcomed, raises the question of how a development will be dealt with if they are not all met. It is noted that the policy requirement is that developments should include these principles, and therefore it is suggested that it is made clearer what will be the degree of flexibility in their application.</p>	<p>Climate change is a significant issue and Haslemere Town Council have declared a Climate Emergency. H3 ensures that any development that occurs within areas of landscape character, outstanding natural beauty, great landscape value and green belt harmonises with its surroundings and minimises its impact and disruption of the ecology and habitat that surrounds them. By including it in the neighbourhood plan monitoring will occur at a local level.</p> <p>Given the residual land values in the WBC Viability Study (June 2017) was £1.86 m per ha for greenfield land versus £3.38m for brownfield so there is sufficient resource to implement this policy without harming viability.</p> <p>Changes have been made to provide flexibility in the policy. The policy no longer addresses the relaxation of the policy rules for community led affordable housing developments since the planning balance for considering community-led housing already allows flexibility in considering the effect of Policy H3.</p>	<p>Policy wording amended.</p>

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	<p>If the intention is that applications that do not meet the criteria should be refused, it is important that any specific standards or requirements imposed through the policy are supported by the evidence and have been viability tested.</p> <p>It is also suggested that it is made clearer what specific requirements will be relaxed for community led affordable housing.</p>		
	<p>Policy H4: Consultation Requirements</p>		
10	<p>p.24 H4</p> <p>It is completely understood that public consultation on large developments is important but it is suggested that this is set out as explanatory text rather than as a development management policy. It is not clear how the policy will be implemented if the criteria are not met. Any requirements need to be aligned with the validation requirements for planning applications and the Statement of Community Involvement set out by Waverley and in the NPPF/NPPG. Currently some of the requirements appear more onerous and therefore will need to be justified. It also appears that meeting them would remove the ability for any outline applications to be submitted.</p>	<p>The requirements do align with the validation requirements for planning applications and the Statement of Community Involvement. The policy merely requires more information that is required for the planning application is shared with the community before an application is made.</p> <p>The policy has been amended to apply also when outline applications are made.</p>	
	<p>Policy H5: Managing the volume of windfall development</p>		
11	<p>P.25 Context</p> <p>It is not necessarily true that additional homes will have to be developed on windfall sites to ensure that the housing requirement is met. A plan, whether it is a local or a neighbourhood plan, can choose to deliver all its housing on allocated sites without the need for homes on windfall development to contribute. This is particularly so as the housing requirement is a minimum and therefore any windfalls would be surplus. The NPPF however recognises that where there is robust evidence that windfall sites have contributed housing in the past, then an estimate of a contribution from windfalls sites can be made when preparing a plan to meet the overall housing requirement. As set out in our previous comments, as it has been decided that it is up to LPP2 to determine how Haslemere’s housing requirement will be met, it will be up to Waverley to estimate the contribution from windfalls taking into account the NPPF’s policy that this contribution must be realistic. This will then be examined.</p>	<p>The WBC Land Availability Assessment (May 2018) lists 65 sites in the Plan Area that are below the 5 unit threshold and so are not considered as potential sites to allocate. It is therefore very likely that the high levels of windfall development in recent years in Haslemere will continue. With an average annual windfall rate since 2013 of 44 homes and the lack of large sites to allocate, windfall is expected to continue to make a significant contribution to delivering the houses Haslemere needs.</p> <p>The following words are from the report of an independent planning consultant employed to perform a Health Check of the NP.</p> <p>“It is entirely appropriate for the Plan to make an assumption on the supply of new dwellings from windfall sites which reflects local evidence of how many have come forward in recent years.”</p> <p>We note that the Farnham Neighbourhood Plan has used a local evidence to derive a windfall rate.</p>	

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12	<p>P.25 H5 Any requirement for affordable housing on windfall sites will need to accord with strategic policies in LPP1 and the NPPF. By their nature many windfall sites will be below the thresholds for requiring affordable housing in those policy documents. Furthermore, although the NP is the local community’s plan for development, providing housing needs through affordable housing is a strategic objective to meet borough wide needs, particularly as the opportunity for affordable housing will be limited in some locations in Waverley. Therefore, on s106 sites meeting local community’s needs would be contrary to strategic policies in LPP1. Furthermore, if the objective to prioritise housing for people with a local connection is expected on general s.106 sites, then this would impact on the mix of bed sizes required/ eligibility/ demand/ allocations and this couldn't be enforced on the shared ownership element if it is funded by Homes England (under their funding regulations).</p>	<p>Noted. However, policy H5 merely encourages those developing windfall sites to consider building affordable homes even if the site does not meet the threshold at which affordable housing is required. Windfall sites have the potential to have low land costs and therefore an opportunity exists to offer homes below market value.</p>	
13	<p>P.27 H6.1 Please see our previous comments on Policy H 1.5 with regard to a map showing the 1 km from the Station zone. Firstly, it is not clear why the provision for electric car technologies is required within 1 km of the Station and not for all new development, particularly as occupiers of dwellings that are located further away from facilities and public transport are more likely to rely on cars. Secondly, it is suggested that it is made clearer how the requirement that all developments within 1 km of the Station should contribute to reducing congestion and improving the flow of all forms of transport within the vicinity of the Station, will be assessed. This will ensure that users of the NP will be clear of the policy expectation.</p>	<p>H6.1 (now H9.1) Provision for electric car / green technologies now required for all development.</p> <p>Requirement for Travel Plans now included within H9.2 to encourage developers to facilitate different travel modes and so that the applications can be assessed on what the impacts are likely to be.</p>	
14	<p>P.27 H6.2 Although the objective of this policy is appreciated, requiring this for all developments will be too onerous. In many cases, such as domestic extensions, it will not be relevant and the approach is disproportionate. The specific routes mentioned in the policy should also be justified.</p>	<p>H6.2 (now H9.2) Point taken and policy adjusted to apply to major development (10+ dwellings) and justification for specific routes inserted in the Context and Reasoned Justification.</p>	
15	<p>P.27 H6.3 It is suggested that more clarity on the criteria and evidence to justify the ‘protection’ of the specific routes set out. The requirement to prevent developments severing the routes could be seen as being too onerous unless the justification for identifying and safeguarding the routes is very clear. Are these routes the ones shown on Figure 2 existing footpaths/cycleways or are parts of them aspirational?</p>	<p>H6.3 (now H9.6) Wording made clearer to show that these are new/aspirational routes and existing routes added to Figures 2 & 3 to show existing routes in a different colour. Flexibility also built into policy to allow routes to be constructed as appropriate to the sites.</p>	

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16	<p>P.27 H6.4 It is suggested that the local justification for seeking compliance in Haslemere with the standards specified in the policy is set out in supporting text. It is also suggested that this requirement is tested for any potential impact on development viability.</p>	<p>H6.4 (now H9.3) This policy specifically applies to new road layouts – giving non-motorised modes greater priority.</p>	
17	<p>P.27 H6.5 It is suggested that this policy requirement is made clearer. Is it about ensuring that pedestrian routes are designed to ensure that they are the most direct routes to the town centre and other areas where facilities are located (i.e. following desire lines)? If so, what is the impact on development viability and how would the policy be implemented?</p>	<p>H6.5 (now H9.4) Policy wording clarified and suggestions for implementation included.</p>	
18	<p>P.30 H7.1 It is not entirely clear what is being required under this policy. The policy talks about adhering to Quality for Life standards and that all new development must comply with the Haslemere Design Statement (HDS). However, it has been mentioned in the NP Principles that the HDS is a material consideration whose objectives the NP builds on but it is not a policy requirement. If the intention is that the HDS should be a policy requirement then it should form part of the NP and it will need to be consulted on and examined. Any policy requirement including the HDS would need to be tested for its impact on development viability. It is suggested that some of the policy requirements need to be more clearly justified. For instance, screening a development from the road may not be appropriate in all cases given the need for buildings to integrate with existing built form and areas as well maintaining security. In other cases it is not clear how the policy requirement will be implemented, for instance H 7.1 vi) fulfilling density requirements set out in Policy H 1.5 but ensuring that overdevelopment is avoided.</p>	<p>The Haslemere Design Statement was adopted as a material planning consideration in July 2012. It has been included in the evidence base for the Neighbourhood Plan. Some wording changes have been made</p>	<p>Policy wording amended</p>
19	<p>P.30 H7.2 It is suggested that the supporting text to this policy sets out how this policy requirement can be met and what is the local evidence to justify this specific requirement if it is going beyond what is in LPP1 and Waverley's Open Space Strategy. This will need to include evidence as to how this might affect development viability.</p>	<p>Policy altered to address only sites where the Accessible Natural Green Space Standards are not met.</p>	<p>Policy wording changed</p>
Policy H8: Internal Design, building standards			
20	<p>P.31 H8.1 The National Space Standards can only be introduced by a Local Plan as stated in the March 2015 Ministerial Statement. In view of this, the Council do not consider that adherence to the National Space Standards can be a requirement of a NP policy. It is intended that this will be secured through a policy in LPP2.</p>	<p>Noted</p>	<p>Policy removed</p>

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	Policy H9: Provide sufficient affordable housing of the right type		
21	<p>P.32 H9.1</p> <p>It appears that the Haslemere NP is requiring development to adhere to the LPP1 affordable housing policy. If so, is a separate affordable housing policy needed? If the NP wishes to have its own affordable housing policy some changes are suggested to make the policy clearer.</p> <p>Please be aware that Policy AHN1 of LPP1 was adopted before the more up to date NPPF and therefore it doesn't take into account the NPPF changes to site size thresholds i.e. affordable housing is required on a sites of 10+ rather than 11 dwellings. This change is a material consideration in the determination of planning applications that is given significant weight.</p> <p>The affordable housing policy in the NP also doesn't mention the level of affordable housing required. It is appreciated that as development has to comply with AHN1 in LPP1 the NP has chosen not to make this explicit. However, you may wish to consider making this clearer to users of your NP.</p> <p>As mentioned previously, Waverley's other concern is that affordable housing is a strategic policy and its provision is to meet Borough wide need as set out in Policy AHN1 of LPP1 rather than just for local need. This is because new housing in some of the settlements has to meet the need of other areas where housing development is more restricted because of designated planning constraints. It is not clear whether the NP is seeking to prioritise all affordable homes to meet local need rather than wider Borough need.</p> <p>The definition of affordable housing makes reference to being at least 20% lower than open market which is used on products such as affordable rents and potentially First homes. However, linking to high open market values rather than local household incomes doesn't necessarily make them affordable as Waverley is finding out with affordable rents etc. and developers may use this 80% as the default and so it may not achieve what they are setting out to achieve. It is recommended that the NP use the definition from the NPPF glossary</p> <p>It is good to see the term local workers used rather than key workers; which as we are seeing also includes shop workers, supermarket delivery drivers, postal workers etc. to keep services running and communities safe.</p>	<p>The Neighbourhood plan is not prioritising all affordable homes for local need rather than borough wide need but is encouraging developers to consider doing so. Haslemere has had very few affordable homes built in the Plan Area in recent years (2 built, 53 granted permission but not yet started) and there is evidence of a high level of local need (Haslemere Community Land Trust Housing Survey Report July 2018).</p>	<p>Affordable homes definition in Glossary amended</p>
	Policy H10: Provide an appropriate mix of housing types		
22	<p>P.33 H10.1</p> <p>Waverley welcomes an approach to housing mix to accord with the strategic policy in LPP1 which is based on the needs of the whole Borough. This is because new housing in some of the settlements has to meet the need of other areas where housing development is more restricted because of designated planning constraints. The issue however is that the NP policy requirement to meet housing mix set out in the West Surrey SHMA Waverley Addendum December 2015 means that local need for Haslemere would be a policy priority over the need for the whole of Waverley. The SHMA addendum was</p>	<p>An independent planning consultant advised that the Neighbourhood Plan can include details of local housing mix requirements.</p>	

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	<p>prepared as additional information of need and not as a basis for a NP policy requirement. It is therefore advised that if the NP wishes to retain a housing mix policy rather than solely rely on Policy AHN3 in LPP1, then it refers only to the West Surrey SHMA only rather than the Waverley specific SHMA addendum.</p>		
	<p>H12 Dark Skies</p>		
23	<p>p. 37 H12 The policy refers to guidance and elsewhere refers to standards. It is suggested that the justification for seeking compliance with the guidance from the Institute of Lighting Professionals is made clear and if this fits with any NPPF/NPPG policy/guidance on light pollution. It may be necessary to have reference to the evidence to support the zones themselves particularly as suburban locations are defined as being within both Zone E2 and Zone E3. If they are to be policy requirements it needs to be clearer to users of the NP exactly what meeting them entails. For instance, exactly how will an applicant know if their development meets or exceeds the ILP guidance for each zone? Furthermore, on main roads there is the intention that E3 is adhered to but it is not clear what the main roads for the purpose of this policy are.</p>	<p>Haslemere borders the South Downs National Park and this policy was developed with the support of the South Downs National Park Dark Skies Officer.</p> <p>The reference to ‘standards’ here encompasses all the standards mentioned in H12 and is not intended to be a reference to the ILP guidance.</p> <p>The ILP Guidance Note 1 for the reduction of obtrusive light 2020 sets out the requirements in the NPPF and other National Planning Policy requirements. The Guidance Note also gives details of acceptable lighting for each of the lighting zones.</p> <p>The map shows which areas are covered by E3, including the relevant roads.</p>	
	<p>Policy H13: Local Green Spaces (within the settlement boundaries)</p>		
24	<p>P.38 – 41 H13.1 and H13.2 It appears that there is a hierarchy of green space with “Local Green Spaces” (LGS) set out in Table 5 and “Green Fingers” in Table 6. The designation of LGS clearly accords with the NPPF but it needs to be made clearer what the status of a green fingers is. Whilst Policy H 13.2 states that they are not designated as LGS, there is still an expectation that the land should be protected and permission will only be granted in special circumstances. It is not clear why some of the smaller green fingers are designated as they appear to be areas of land that could be considered as LGS. Similarly there are tracts of green space identified as green fingers that would not accord with the criteria for designating LGS as set out in the NPPF and NPPG, but under the policy they appear to have the same protection. By identifying all these areas of land under the same policy designation as a green finger means that the spaces that may be worthy of a LGS could be undermined. Given these comments you may welcome a further discussion with the Council on the designation of local green spaces.</p>	<p>The original list of LGS sites was based on WBC’s assessment of Haslemere’s candidate sites in WBC’s Local Green Space Topic Paper (2018) which identified 6 sites for LGS designation. In the light of these latest comments, the full list of sites has been re-assessed against LGS criteria as set out in NPPF para 77. As a consequence, a number of sites have been re-classified. Full details are contained in the supporting paper ‘Local Greens Spaces and Green Fingers Assessment’ provided in the evidence base.</p> <p>The policy wording has also been reviewed in consultation with an independent Planning Consultant to clarify the distinction between the LGS and Green finger designations and the respective levels of protection proposed in this NP.</p>	<p>The full list of sites has been reassessed against LGS criteria and this has led to the re-classification of some sites.</p> <p>Policy wording has been amended to clarify distinction between the LGS and Green Finger.</p>
25	<p>p. 41 Figure 6 The numbering on the map is currently not clear. Is there a reason why there are three no. 14s and three no. 16s?</p>	<p>We agree that the numbering system for individual sites on the maps could be improved. The latest version of the NP contains a revised set of maps.</p>	<p>Numbering system for sites on map has been reviewed/improved.</p>

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	Policy H14: Wildlife corridors and stepping stones		
26	<p>P.42 H14.1</p> <p>If you haven't done so already please liaise with Natural England over this policy. In our view the policy seeks to duplicate Policy NE1 of LPP1 and you may want to think about whether a separate NP policy is needed.</p> <p>It is also suggested that it needs to be clearer as to how these 'wildlife corridors' and 'stepping stones' are going to be identified?</p>	<p>We had indicated that this policy would continue to evolve pending output from work commissioned earlier this year to map the main wildlife corridors and stepping stones across the NP area. This work was undertaken by GS Ecology Ltd and GPM Ecology and completed in late October; the results underpin the new revised policy. Full details of methodology used along with the full set of maps are contained in the supporting report 'A Biodiversity Audit of Haslemere's Ecological Network' in the evidence base.</p> <p>Meetings with Surrey Wildlife Trust and Natural England have been arranged to review the mapping work and associated policy.</p>	<p>Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts.</p> <p>Policy title has also been changed from 'Wildlife Corridors and Stepping Stones' to 'Protecting and enhancing biodiversity through Haslemere's Ecological Network'.</p>
	Policy H15: Retaining and encouraging local employment		
27	<p>P.45 Context</p> <p>It is noted that consultation shows strong support for the relocation of the Weydown Industrial and Unicorn Trading Estate to an area with good access to the A3. This would release land to meet the housing requirement. Although there may be benefits, you are right to point out that redevelopment is not currently proposed. The NP needs to be sensitive to current and would be investors in the land. Any benefits that there may be in relocating will have to be balanced with the current sites' sustainable location, its proximity to a labour supply and to other markets, as well as any planning constraints on alternative sites.</p>	Noted	
28	<p>P.45 H15.1</p> <p>It is appreciated that the policy clarifies the evidence that would be needed to support proposals that would result in a loss of employment sites. However, in some cases a 12 month period may be too long or not long enough, depending on the economic circumstances. Therefore, the Council considers that this requirement should be set out in the supporting text rather than in the NP policy. This will allow for flexibility that can adapt to changing economic circumstances.</p>	There is sufficient flexibility in the policy application regarding the 12 month period.	

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	Policy H17: Retaining, enhancing and managing changes to retail		
29	<p>P. 47 H17.1</p> <p>Whilst it is appreciated that Article 4 directions are a legal mechanism to help maintain the vitality and viability of retail centres, this is not a policy to manage development and land use. It is difficult to see how the policy would be applied when determining a planning application, particularly as article 4 directions relate to permitted development and therefore a planning application is not needed.</p> <p>A more pragmatic approach would be for the NP to identify those commercial areas or centres where retail use should be protected that will not be identified through the emerging LPP2 to set out specific local requirements for determining applications for a change of use from retail. These requirements would need to be justified by supporting evidence which could also be used to support a request to Waverley for an Article 4 direction.</p> <p>It is suggested that the intention to request them can then be set out in supporting text,</p>	Noted	Removed policy and added detail to Context & Reasoned Justification
30	<p>P.47 H17.2</p> <p>This policy says that a change of use will be supported but it is not clear what will not be supported.</p>		Policy wording amended
	Policy H18: Encouraging an expanded visitor economy		
31	<p>P.48 H18.1</p> <p>It is suggested that it is made clear what the policy is for new build visitor accommodation. Is the policy for conversion of existing dwelling houses only and if so, how would new buildings for visitor accommodation be considered? Any loss of existing dwellings will have to be taken into account when updating the housing supply position to meet the housing requirement for Haslemere</p>		Policy removed
	Section 4: Delivery and monitoring		
32	<p>P.50-53</p> <p>The section of delivery and monitoring is welcomed and demonstrates the positive commitment to reviewing the NP if policies are not meeting their objectives. It is welcomed that the responsibility will lie with the town council to assess policies whilst Waverley will obviously assist the process by providing details of planning applications in the Haslemere neighbourhood area.</p>	Noted	
	Opportunities		
33	<p>P.56 – 60</p> <p>It is appreciated that the opportunities set out in the NP are ideas and schemes that are to be encouraged and are not policy requirements themselves. It shows some of the thinking needed to meet the NP’s vision. However, have the opportunities been discussed with the potential partners listed? In some cases there are clear requirements for landowners which would need their acquiescence. It is very important that any information set out in the NP does not undermine certainty and investment in the sites unless there is clear evidence to justify it.</p>	The opportunities have been discussed with landowners and potential partners.	

Appendix 11 c - Haslemere Neighbourhood Plan – Regulation 14 Consultation Representations, Response and Suggested Action

WBC No.	Representations, comments and issues raised – Waverley Borough Council	Response	Suggested actions
	Glossary		
34	P.62 - 66 The glossary is welcomed as it provides clarity. However, the definitions set out need to be checked as they should accord with the definitions set out in the NPPF, NPPG and LPP1, for example affordable housing. Where there is a different definition then this would need to be justified by supporting evidence	Changes made as necessary.	