

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

Old number	Representations, comments and issues raised by residents via online survey Representations, comments and issues raised	Response	Suggested actions
H11.1	<p>I support the policy fully, but would add that developers who deliberately remove trees, since they are prepared to pay the fine (as it is usually a relatively small sum in their overall scheme of things), should be much more heavily penalised, as well as having to plant new trees.</p> <p>Not clear whether we have the ability to charge large fines for trees being ‘accidentally’ damaged during developments. Paying a few hundred pounds as a fine for cutting down a protected tree is a fine worth paying for some developers.</p> <p>This policy needs stronger sanctions to deter breaking the intent behind it.</p> <p>Heavier penalties for damage should be incurred. Planting new trees is not a sufficient deterrent. Trees should always be replanted where the damage occurred otherwise developers will knock down trees to build and then replant in a way that suits them rather than as supports the environment.</p> <p>Numerous similar comments</p>	<p>The NP has no power to increase the penalties for improper removal of or damage to trees or hedgerows. However, the policy does require appropriate replacement or compensation for both intentional and accidental loss or damage to trees, woodland or hedgerows.</p>	<p>Replacement planting requirements have been expanded and clarified.</p>
H11.1	<p>This policy is extremely weak and does not afford the habitat protection required. The statement 'will not normally be permitted' leaves any developer an open door to destroy precious, ancient and high value trees, with the only sanction being the planting of new trees. There should be a presumption that a blanket TPO will be placed on all woodland/land sold for development and permission sought for any felling BEFORE any pre-planning discussions take place with WBC. It is essential to strengthen this policy if this plan is to genuinely seek to protect the landscape and biodiversity that is claims in its opening vision statement.</p> <p>'not normally be permitted' is not concrete enough. Loss of trees should never be permitted. The policy is weak in terms of developers should never cause damage to an area.</p> <p>Numerous similar comments</p>	<p>The NP may not set out a blanket refusal to consider applications that would result in loss of or damage to trees or hedgerows.</p> <p>HV/HTC met with Waverley Tree and Landscape Office to discuss WBC's policy on this issue. WBC's current position is that a blanket imposition of TPOs at the point where a site is allocated would simply encourage felling before that point, which the policy would be powerless to prevent.</p> <p>Meanwhile, a proposal for a survey to identify and trees and hedgerows of local intrinsic value (landscape, biodiversity, cultural, historic) has been put forward under Opportunity 19. This could help identify 'sensitive zones' that may justify special protection and support a more proactive/targeted basis for TPO applications.</p>	<p>Policy H11 has been enhanced to include additional policy provisions to clarify the requirements based on consultation feedback.</p>
H11.1	<p>This policy is too weak and must be strengthened to protect the natural environment so precious to all of us. Firstly, trees should never be cut down and tree damage should never rather than 'not normally' be permitted. Secondly, this policy suggests compensation for loss or</p>	<p>The NP may not set out wholly inflexible policies – some flexibility must be left to the Councillors to balance conflicting demands.</p>	<p>Policy H11 has been strengthened so far as possible. The requirement for replacement or compensatory planting has been expanded and</p>

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	<p>damage of trees after the event. There should never be a need to compensate as no damage should have been permitted in the first place.</p> <p>The policy intention seems good but the wording is too weak: Replace "should" with "must" in all instances. Remove "to compensate for the loss that has occurred". Planting new trees should not be suggested to 'compensate for the loss' that has occurred by felling mature ones, which may be many decades old, especially if that damage was intentional. This sounds too much like a carte blanche for any potential developer to improve development prospects by felling mature trees, and then to get away with it by offering to plant saplings in their place</p>		clarified to make it clear that replacement trees should be of equivalent value, not just number.
H11.1	Trees are vital but not the only important habitat around Haslemere - wetlands, heaths and diverse grasslands also need to be included in this policy.	Policy H14 Protecting and Enhancing biodiversity through Haslemere's Ecological Network protects these areas.	
H11.1	Haslemere Natural History Society We would like to see this clause read "Where damage intentional or otherwise does occur.....new trees must be planted (native trees to be replaced with native trees)...."	Policy H11.6 now includes strong wording regarding replacement planting where intentional or accidental loss occurs.	Policy amended
H11.1	A more powerful deterrent is required to discourage damage to trees, linked to the granting of permission. Damage done will take years to recover, by which time developers will be long gone	It is not in the power of the NP to increase the penalties for felling or damaging trees outside the consideration of planning applications.	Policy H11 includes strong wording regarding the presumption of retaining mature and semi-mature trees and for replacement planting where loss is considered unavoidable.
H11.1	Revise to read "Proposals must be accompanied by a tree survey that establishes the health and longevity of any affected trees"		Policy H11 has been expanded to include an expectation that applications will include an arboricultural impact assessment undertaken by a qualified arboriculturist or ecologist.
H11.1	The aim to conserve and enhance the landscape and scenic beauty of the Surrey Hills AONB is welcome, as is the intention to protect ancient woodland, veteran trees and species-rich hedgerows. However, protecting the AONB goes beyond trees and hedgerows, important as they are. The policy should therefore acknowledge the AONB protections in the NPPF, Part 1 of WBC's approved Local Plan Part 1 and the Surrey Hills AONB Management Plan and look at additional protections in the context of local circumstances.	Development proposals must comply with all policies in the Neighbourhood Plan. Policy H3 has been amended to specifically reference the protections for AONB.	Policy H3 amended.
H11.1	Some flexibility will be required to meet housing numbers and loss of occasional mature trees should require replacement with at least two replacement trees.	The requirements around replacement planting have been framed in terms of equivalent value rather than on a numbers basis to discourage the loss of older, larger trees where possible.	

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H11.1	<p>I would suggest renaming this policy as 'Trees and Hedgerows' and re-writing the context part to also encompass the landscape, cultural and historical value of trees as well as their importance in biodiversity, nature recovery and climate change. There have been a number of cases in Haslemere where developers have gone ahead and removed significant trees on certain sites before planning permission has been approved. To address this problem, I would also suggest strengthening the policy by, for example: Referencing British Standard 5837:2012 'Trees in relation to design, demolition and construction - Recommendations' which provides best practice advice for considering arboricultural issues when determining planning application. This standard requires that arboricultural advice is obtained at the very outset of any development, and that advice and supervision is continued through to final completion. Key requirements include: Ensuring that the tree survey is carried out ideally pre-application by a competent arboriculturalist. The planning application itself should include: A tree survey (if not submitted during pre-application discussions) together with a tree retention/removal plan and a tree protection plan. A proposed layout showing retained trees and Root Protection Areas (RPAs) and an arboricultural method statement. Strategic hard and soft landscape design, including species and location of new tree planting An arboricultural impact assessment. Details for all special engineering within the RPA and other relevant construction details. The Reserved Matters/Planning conditions should address: Alignment of utility apparatus where outside the RPA or where installed using a trenchless method Dimensioned tree protection plan Detailed Arboricultural method statement Schedule of works to retained trees eg access facilitation, pruning Detailed hard and soft landscape design Arboricultural site monitoring schedule Tree and landscape management plan Post-construction remedial works Landscape maintenance schedule It is also suggested that further detail is provided in the event of damage or loss of trees. For example, 2-3 new trees should be replanted for every damaged/lost tree; replacement trees should be resilient native species.</p>		<p>Policy H11 has been renamed and amended to refer to the wider benefits of trees and hedgerows beyond their biodiversity value (which is explicitly covered in Policy H14).</p> <p>References to BS5837:2012 have been added and requirements for a site survey, arboricultural impact assessment and tree protection plan together with a tree removal plan and a tree planting/landscaping plan.</p> <p>The requirements on replacement planting have been expanded to make it clear that new planting should be of equivalent value, not just number.</p>

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H11.1	2019 saw the destruction of much forest and uncountable trees worldwide, which has made the trees that are still on the planet more precious. I think it is important that we do not just protect 'special' trees (trees, of good arboricultural or amenity value, including veteran trees), but protect any tree. Newly planted trees are not equivalent to trees that are decades old.		Policy H11.2 states that developments should avoid damage to or loss of mature or semi-mature trees other than in exceptional circumstances. The policy on replacement planting has been enhanced to require 'equivalent value' rather than simply equivalent numbers in order to reflect the greater value of some trees, including older trees, even where they are not specifically protected by TPOs.
H11.1	This policy would be improved if it referred to British Standards BS5837 2012, Trees in Relation to Design, Demolition and Construction. This provides recommendations relating to tree care, with a view to achieving a harmonious and sustainable relationship between new construction/existing structures and their surrounding trees. This policy should also refer to the avoidance of Post Development Pressure on trees either newly planted or existing. British Standards BS5837 2012, paragraph 5.6.2.6 Trees in Relation to Design, Demolition and Construction provides detailed guidance on the avoidance of post development pressure for both existing trees on development sites and any proposed planting. Where buildings are placed close to existing trees or new trees are planted nearby, these trees can quickly be perceived as a nuisance in terms of blocking light, leaf fall etc. Residents will then apply to have the trees cut back or removed.		A reference to BS5837 has been incorporated into policy H11.4.
H11.1	Given the importance of woodland in the local environment tree preservation and planning should be based on a documented and developing ecological strategy. Decisions should give high priority to biodiversity considerations including the selection of species, understorey improvement, and glades. Ideally the strategy should include input from relevant bodies including Natural England, the Forestry Commission, the NT, SWT and the South Downs National Park. Such input might be best obtained through ongoing informal networking rather than formal processes. The increasing problem of climate related threats to tree species across southern England accentuates the need for careful science-based surveys and actions that are beyond the scope of individual local authorities. Another specific consideration is that some areas of local woodland are dominated by economic species and there may be a case for planning some progression towards more diversity in these pockets.	The NP does not have the power to direct WBC to draft such a strategy or undertake the work that would be required to underpin it. A biodiversity audit of Haslemere's ecological network has recently been completed in support of Policy H14. An important next step will be to develop a Haslemere Biodiversity Action Plan. Additionally, a proposal for a survey to identify and trees and hedgerows of local intrinsic value (landscape, biodiversity, cultural, historic) has been put forward under Opportunity 19. This could help identify 'sensitive zones' that may justify special protection and support a more proactive/targeted basis for TPO applications.	

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H11.1	<p>Tree planning should include an ecological perspective. Develop strategic (area-wide) criteria that influence the species to be planted, understorey planting and glades with the objective of enhancing the area's biodiversity.</p> <p>Many trees of great landscape and environmental value are not protected and being steadily lost. In addition to the above policy we need more TPO's generally.</p>	<p>The NP does not have the power to direct WBC to undertake this work nor to direct WBC's policy on TPOs. However, HV/HTC would encourage residents to propose TPOs for any trees or groups of trees that they consider to meet the criteria, as set out on WBC's website.</p> <p>A proposal for a survey to identify and trees and hedgerows of local intrinsic value (landscape, biodiversity, cultural, historic) has been put forward under Opportunity 19. Output could be used to define a local Tree Strategy to guide how we maintain, enhance and proactively manage these resources. It could also help identify 'sensitive zones' that may justify special protection and support a more proactive/targeted basis for TPO applications.</p>	
H11.1	<p>This is a loaded / leading question - by design it directs you to tick YES or OK if you want to protect trees - who doesn't? But the policy that you are steered us towards is totally inadequate for achieving the protection of trees - especially veteran trees and the ecosystems that they are part of. As a friend who is a very successful property developer said to me, "if the intention is to protect trees and the ecosystems that they are part of - council must on receipt of any proposal for a housing development - this is prior to a formal request for planning permission – place blanket TPO's on all trees on the site." This is standard practice in many boroughs he has built large housing developments in. I have reliably been told by our local planning officers and tree inspectors that on purchasing land for housing development, developers chop down all trees that may impact on their profits, prior to a formal planning development request. What is needed are laws in place that provide ironclad protection for trees and ecosystems; and penalties for breaking these laws be sufficient to deter the destruction of trees and habitats by an unscrupulous property developer.</p>	<p>It was not the intention of HTC/HV to make the questions 'leading' and we apologise if you felt that this or any other questions were so.</p> <p>It is not within the power of the NP or HTC/HV to direct WBC's policy on TPOs or to amend the penalties for improper felling. In a meeting with HV/HTC, WBC's Tree and Landscape Officer explained the concern that blanket imposition of TPOs on a site at the point of allocation will simply encourage some developers to fell all trees before that point.</p>	
H11.1	<p>The term "will not normally be permitted" is an open door to developers. Red Court has already seen swaths of trees felled under the term woodland management in order to reduce the biodiversity and wildlife. When allocated sites are proposed they should have a restriction on work against all trees, hedgerows and meadows land. Without this clause the net gain biodiversity is a mockery.</p>	<p>It is not within the power of the NP to direct WBC's approach to TPOs or other protections on allocated sites.</p> <p>The NP may not include blanket bans on certain types of activity or development.</p>	<p>The policy has been strengthened so far as is possible to prevent granting of permissions where this would lead to loss or damage of trees, woodland or hedgerows.</p>
H11.1	<p>No tree or shrub removal should be permitted until planning permission has been granted. I have experience of a neighbour who removed several trees prior to submitting a planning application that was subsequently denied.</p>	<p>The NP will form part of the material that WBC must consider when assessing planning applications. It does not have the power to constrain landowners actions outside of that process.</p>	

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H11.1	Could the statement be stronger about any trees damaged during development being replaced by new trees? My concern being developers have been known to "accidentally" damage a large mature tree and replace with a small tree that would take many years to mature. Perhaps there should be a financial penalty if any trees are damaged, along with the replacement with a substantial new tree.	It is not in the power of the NP to increase financial penalties for improper felling of or damage to trees.	The policy statement regarding replacement planting has been expanded and clarified to refer to planting of 'equivalent value' to those trees lost.
H11.1	Compensation planting for the loss of a mature tree should be sufficient, clearly defined and inspected.... A huge 100 year old oak needs to be replaced by a good deal more than a young sapling!		The policy on replacement planting has been amended to refer to 'equivalent value' to prevent a simple 1:1 replacement of mature trees with saplings.
H11.1	I support the statement and policy that development that results in substantial loss or damage of trees as stated will NOT normally be permitted. Any such development must be accompanied by a section 106 agreement or similar that stipulates what the developers must undertake and the penalties if they don't do it within a certain timeframe – and a continued commitment to maintain the ecological enhancements in perpetuity. There must be the enforcement powers to back this up, such as substantial fines and demolition.	It is not within the power of the NP to impose or increase financial or other penalties for failure to comply with planning requirements.	Policy H11.6 (iv) requires the developer to make arrangements for ongoing maintenance of communal areas for developments over 10 properties. Policy H11.4 includes a reference to the use of s106 requirements.
H11.1	<p>In Waverley as a whole I think too much emphasis is given to the importance of trees (often non native specimens) to the detriment of people. Sacrificing a number of old trees is fully justified in my opinion if the alternative is less housing. I agree that new trees (varieties more suited to urban spaces) should be planted if trees have been lost due to development.</p> <p>Provided this is implemented with common sense. We cannot have valuable community housing completely halted due to one or two trees. Therefore ensuring that any loss is more than adequately compensated for should become a governing factor in the decision making process and more importantly that any replacement work is undertaken under supervision and signed off by the council.</p>	A majority of the responses received support the protection of trees and many press for stronger protections. However, Policy H11 is intended to allow Councillors flexibility in deciding the balance of the community's interests where there are conflicts of the sort described.	Policy H11.6 allows for the replacement of trees that are lost or damaged during development and provides guidance about the location and nature of the planting.
H11.1	The policy should also apply to trees of historical and/or cultural significance. The policy should also apply to the soil environment in which the tree grows. A newly planted tree does not equate to, nor can adequately replace, an ancient tree, which will likely support extensive wildlife and be supported by a complex fungal and invertebrate ecosystem in the soil - all of which takes decades and more to evolve.	No specific reference is made in the policy to the loss of the fungal and invertebrate ecosystem referred to here. This is one of the reasons for the policy intention to discourage loss of mature trees but clearly cannot be replicated if such a tree is lost.	Policy H11 has been amended to refer to the wider range of benefits that trees and hedgerows bring. The replacement planting policy has been enhanced to refer to 'equivalent value' rather than just 1:1 replacement.

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H11.1	What does "good arboricultural or amenity value" mean? I think it will mean what anyone wants it to mean which is bad drafting. We need to be more specific. What does 'veteran tree' mean? Over 70 years .? Does it have to be a fine specimen ? I suggest we draft it this in positive way: Development should seek to respect high quality mature trees, and shall retain them as far as possible. A landscape proposal including the addition of new planting shall be submitted for approval.	Policy wording needs to allow Councillors some flexibility to balance conflicting demands.	Policy amended to remove these references. Instead, an arboricultural impact assessment undertaken by a qualified professional is required. This will include listing of trees by generally accepted categories. A detailed Landscaping Plan is also now required as part of the application.
H11.1	There needs to be some flexibility. Sometimes you need to cut down trees, and it may not be safe to build a house near aging trees that could fall down in a storm and hit houses.	The policy allows flexibility to Councillors to balance conflicting demands. The policy does not protect already diseased or unsafe trees.	
H11.2	I would suggest strengthening this policy to provide robust protection of existing, established native hedgerows. Also a commitment to proper maintenance of hedgerows	The policy offers support to development proposals that protect and enhance hedgerows.	The requirement for replacement planting to compensate for loss or damage has been expanded to cover hedgerows.
H11.2	Should this say something about NATIVE or suitable (or similar?) to avoid inappropriate hedgerows being added?		H11.3 specifies native hedgerows. Policy H11.6(ii) states that replacement planting should use native species where appropriate.
H11.2	This wording implies that while adding/retaining/protecting hedgerows is a positive attribute of a planning proposal, destroying them is not actually a negative one. Proposed wording: "Proposals should be designed to add, retain and protect substantial hedgerows wherever possible."	Policy wording has been changed to state "Development proposals will be supported where they conserve and enhance trees, hedgerows and woodland."	H11.1 wording amended H11.2 - expanded to support landscape proposals that retain important hedgerows within areas of public open space.
H11.2	'Substantial' is perhaps a misleading word, 'ancient' or '(bio)diverse' should be added. Otherwise planning might be used to inappropriately protect vast monospecies hedges that are not uncommon here and should really not be encouraged. Adding hedges that include multiple native species would certainly be desirable.	This has been left to the discretion of the Planning Committee, who, guided by the tree officer, may decide to permit loss of monoculture hedgerow where more biodiverse hedgerow would be protected.	H11.3 – protection comment specifies native hedgerows. Where replacement planting of hedgerow is required, there is a requirement to use native species where appropriate.
H11.2	All hedgerows should be logged adjacent to all development sites or allocated sites in the Local Plan and confirmed when the project is completed. Additional indigenous hedgerows should be between any housing and roads, paths and other properties.	The NP does not have the power to direct the logging of hedgerows in this way. However, hedgerows are identified and protected as important components of Haslemere's ecological network under Policy H14.	Policy amended to require a full site survey to be undertaken by a qualified arboriculturist or ecologist.
H11.2	This should exclude hedges that are primarily non-native species, such as cherry laurel (<i>Prunus laurocerasus</i>) or Lawson's cypress (<i>Chamaecyparis Lawsoniana</i>) or leylandii (<i>Cupressus × leylandii</i>), that do not support rich ecosystems and/or shade out other plants.		Policy H11.3 amended to refer to native hedgerows.
H11.2	Haslemere Natural History Society. Our submission on the Design Statement recommended that developers should be required to conduct a Wildlife Impact Assessment, where appropriate taking advice from organisations such as the National Trust or Haslemere Natural History Society.	Wildlife impacts are addressed under Policy H14 which seeks to maintain, protect, consolidate, extend and enhance Haslemere's ecological network.	
H11.2	I'd wish to see policy strengthened to provide strong protection of existing, established native hedgerows. We should lose these only with the very strongest justification and even where this is the case it must be mitigated by planting replacements.		Policy H11.6 amended to clarify the preferred use of native species if replacement planting is required.

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H11.2	Requires a statement of commitment to properly maintain the hedgerow, with replacement planting for thin, missing and damaged areas.		Policy H11.5 now requires suitable protection during development and that opportunities for restoration etc are identified and incorporated.
H11.3	Another consideration, depending on the time of year of the construction, is the bird nesting season. Developers should be persuaded not to allow disturbance, by their construction staff, of hedges, shrubs etc. if there is a chance of nesting birds being present.	Protections for nesting birds are included in the Wildlife and Countryside Act 1981 and the European Habitats Directive 1992/Nesting Birds Directive.	
H11.3	I would suggest strengthening it by including the following wording: '...adequately protected during all stages of development to avoid....'		Reference to BS5837:2012 covers a range of protections during the build.
H11.3	This policy would be improved if it referred to British Standards BS5837 2012, Trees in Relation to Design, Demolition and Construction. This provides detailed recommendations relating to tree care during construction.		The Policy now refers to BS5837:2012.
H11.4	This policy is not fully clear- in particular the reference to 'remote habitats', or how 'positive net impact' is defined.	The biodiversity elements have been moved to Policy H14.	Policy H11 amended to remove the reference to remote habitats.
H11.4	<p>This policy does not protect surrounding ecology and habitat enough. There is no situation in which a developer should be permitted to damage a natural ecosystem only to pay for it to be reconstructed somewhere else. Each ecosystem is unique in situ and not only takes years to develop but has developed in the areas it has for specific reasons. There is nothing to say replaced ecosystems elsewhere will flourish nearly as well in that environment than they did in their natural location.</p> <p>This policy does not focus on protection of mature habitats but rather allows developers to actually destroy habitats and then try to pay or offset at some other location. It would be better to have a policy that required proposals to protect and enhance biodiversity. Finally, the concept of positive net impact is open to wide interpretation.</p>		Policy H11 <i>Trees, woodland and hedgerows</i> and H14 <i>Protecting and enhancing biodiversity through Haslemere's Ecological Network</i> together seek to protect the environment. The titles of these policies have been amended.
H11.4	I suggest strengthening to avoid situations where a developer is permitted to go ahead with a proposal with very little biodiversity value by promising to fund/manage improvements in a remote Plan area.		<p>Reference to remote area removed. Further detail on replacement planting included. Proposal that all landscaping and replacement planting should be covered by a s106 agreement.</p> <p>Offsite biodiversity off-setting to ensure net biodiversity gain is addressed under Policy H14. This will be permitted only under exceptional circumstances with priority given to offsetting schemes within local Biodiversity Opportunity Areas.</p>
H11.4	how would this be quantified?	Elements of H11.4 relating to ecological net gain are now covered under Policy H14 with calculations based on nationally or locally recognised metrics such as DEFRA's Biodiversity Metric 2.0.	Policy amended to give more detail around replacement planting requirements.

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H11.4	I do not like the "or" because it means that a plan may fund some improvements within the Plan area which are far less than the ecological damage it is causing. Proposed wording: Development proposals which have a positive net impact on the local ecology and habitat, either in the area surrounding the site or by funding and sustainably managing improvements to remote habitats within the Plan area, will be supported.	Elements of H11.4 relating to ecological net gain are now covered under Policy H14. This has been considerably revised and strengthened and includes a requirement for developers to demonstrate post-development achievement of a minimum 20 percent increase in biodiversity net gain as part of their planning application. Offsite biodiversity off-setting to ensure net biodiversity gain is achieved will be permitted only under exceptional circumstances with priority given to offsetting schemes within local Biodiversity Opportunity Areas.	The policy on replacement planting has been expanded to clarify the requirement for planting of 'equivalent value' to that lost.
H11.4	positive NET impact isn't sufficient - there should be no negative impact on the surrounding ecology and habitat whatsoever, and funding or sustainably managing improvements to remote habitats should not be used to condone any negative impact	The NP may not set out wholly inflexible policies. Given the requirement for additional housing imposed by the government and the extent of protected land in the area, it is impossible to prevent all damage. The NP attempts to provide an appropriate balance between these conflicting demands. Elements of H11.4 relating to ecological net gain are now covered under Policy H14.	
H11.4	Yes but it should be underpinned by a well-considered overview of native and established natural biodiversity.	Amended Policy H14 addresses and provides more detail on this topic. A biodiversity audit of Haslemere's ecological network has recently been completed and will form the basis for a Haslemere Biodiversity Action Plan.	
H11.4	Policies worded like the above are at risk of being nothing more than 'green wash'. The intention one hopes is to create biodiversity gain, which although it sounds good is a concept that is as yet un-legislated, and carries no enforcement powers. Section 106 is the nearest protection, yet no mention is made of this in this policy. You are asking respondents to agree in principle to an as-yet-un-mandated, open-ended unenforceable loophole with no legal teeth.	Elements of H11.4 relating to ecological net gain are now covered under Policy H14. This has been considerably revised and strengthened and includes a requirement for developers to demonstrate post-development achievement of a minimum 20 percent increase in biodiversity net gain as part of their planning application.	
H11.4	A positive net impact is subjective and not enforceable. Existing mature and established ecological sites which contain wildlife corridors or stepping stones shall not be moved or relocated.	Elements of H11.4 relating to ecological net gain are now covered under Policy H14. This has been considerably revised and strengthened and is informed by a recently-completed biodiversity audit of Haslemere's ecological network. Among other things, this policy includes a requirement for developers to demonstrate post-development achievement of a minimum 20 percent increase in biodiversity net gain as part of their planning application.	

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H11.4	The principle of net biodiversity gain is very problematic. No credible calculation has yet been established as an independent arbiter to determine how “gain” off-sets “loss.” I do not agree that this single condition alone is acceptable as a loophole to build on protected biodiversity-rich AONB/AGLV. Where the intention is to ensure biodiversity gain, that is good. However, the gap between what is proposed and what is delivered is the problem – what isn’t stated here is that any such development must be accompanied by a section 106 agreement or similar that stipulates what the developers must undertake and the penalties if they don’t do it within a certain timeframe – and a continued commitment to maintain the ecological enhancements in perpetuity. There must be the enforcement powers to back this up, such as substantial fines and demolition. There is no mention of any such requirement in this document or in the questionnaire. Existing brownfield, in-fill and available viable sites of lesser ecological, wildlife and biodiversity must be used for construction as a priority before any AONB/AGLV/Green Belt, wildlife corridors and stepping stone land is considered for development.	Elements of H11.4 relating to ecological net gain are now covered under Policy H14. This has been considerably revised and strengthened and is informed by a recently-completed biodiversity audit of Haslemere’s ecological network. Among other things, this policy includes a requirement for developers to demonstrate post-development achievement of a minimum 20 percent increase in biodiversity net gain as part of their planning application. We acknowledge that the metrics of measuring biodiversity net gain are evolving rapidly. The policy currently recommends that calculations are based on nationally or local recognised metrics such as that produced by Defra (currently Biodiversity Metric 2.0). We are working with other organisations on this topic (including Natural England and Surrey Wildlife Trust) and we will update requirements as we move forwards.	
H11.4	I would like local people affected by the development proposal to have a say in whether an improvement that was being offered was desirable and welcome. Developers suggestions are sometimes rather wide of the mark, as they try to tick another box.	Policy H4 requires a consultation exercise for larger developments. For all other developments, residents may feed into the normal planning process by responding to the application (on the WBC website) and/or by contacting their local Councillor or those Councillors on the Planning Committee (contact details are available on the WBC website).	
H12	I am concerned that in stating that post development mitigation may be required to meet the standards specified suggests that in some cases the dark skies principle will not be respected by a development- I would rather the policy be worded so that it is not possible for any development to get away with not meeting the standard.	The reference to post-development mitigation is not intended here to cover failure of developers to comply with the terms of the permission (the normal process would apply here) but situations where later or ongoing work will be needed should the measures agreed be insufficient to meet the required standards.	
H12	There should be flexibility to reflect individual sites and their specific circumstances. Also, the policy should be strengthened to address post-development monitoring and mitigation that ensures stated standards are being followed.	The policy states that planning conditions will be used to require monitoring of the measures used. Should these prove inadequate, post-development mitigation will be required.	
H12	Encourage use of newer energy efficient lighting. Need to cater for sports field lighting provision in evening and winter months.	The relevant ILP guidance notes provide information as to the most appropriate forms of lighting for different situations.	
H12	This policy should not contradict the policies on safe routes from developments to the station, town centre and Wey Hill. There routes should be adequately lit without dark pools between street lights (as is the case now on some Halsemere roads)	Main routes are expected to be more brightly lit in line with the E1 – E3 designations.	
H12	As with many of the environmental policies, implementation and follow are critical so 'Post development mitigation to meet the standards specified will be required when appropriate' is vital.	Agreed!	

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H12	<p>While not qualified in this area we feel the policies rather lack teeth. We hope that the following detail may be enable you to translate it into policy. Our bat expert says that light sensors have been used effectively along the Thames, improving the situation for bats. Also, light attracts insects away from their natural habitats, impairing their ability to breed which affects the higher levels of the food chain. A paper by Alston Fure, a consultant specialising in bats and lighting impacts, says: ""Use of planning conditions Conditions are an important way in which planning authorities can influence the design of lighting installations and mitigate their impacts. In relation to lighting, such conditions include: hours of illumination; light levels; column heights; specification and colour treatment for lamps and luminaires; the need for full horizontal cut-off; no distraction to the highway; levels of impact on nearby dwellings; use of demountable columns; retention of screening vegetation; use of planting and bunding to contain lighting effects; erection of demonstration luminaires; and review of lighting impacts after installation. More could be made of the use of light sensors which are activated when they are needed. They are less wasteful of energy, and are considerate of Health and Safety obligations."</p>	<p>Thank you for this additional advice which is very helpful. The ILP Guidance Note 8, Bats and artificial lighting in the UK, which is referenced in the Context and Reasoned Justification sections, provides relevant detail on appropriate lighting in areas used by bats.</p>	<p>Policy H12(iii) has been expanded to require lighting appropriate to the relevant species for particular sites and habitats. Additional material also in Context & Reasoned Justification suggests sources for further information.</p>
H12	<p>Footpaths need to be lit for reasons of safety and personal protection</p>	<p>The policy does not prevent appropriate lighting for footways or roads but seeks to ensure that such lighting is at the lowest level commensurate with safety.</p>	
H12	<p>I suggest that there is a follow-up post-construction check to see if it is used as agreed (if that is legal). Also, I suggest the council should look at its own street lightening to make sure it fits with the Dark Skies aspiration. Streetlights are often a large source of light pollution.</p>	<p>The NP does not cover the Council's lighting responsibilities. The policy states that planning conditions will be used to require monitoring and post-development mitigation will be required when appropriate.</p>	
H12	<p>The plan says all development outside the existing boundary must be E1 which is 'Intrinsically dark". Just not realistic. Change plan to E2 for development outside the Boundary and E3 for most others.</p>	<p>Responses have been generally in favour of the designations as set out in the consultation document, with the exception of provision for adequate lighting on personal safety grounds.</p>	
H12	<p>There should be some flexibility to consider each site and their individual circumstances</p>	<p>The policy does not prevent the granting of permission to developments that cannot meet the ILP guidance.</p>	
H12	<p>I do not support the policy as written. Saving energy and reducing our light footprint are commendable objectives but the provision of light is also a health and safety issue both to prevent injuries and as discourage crime. Also if the streets are too dark it will discourage people going out at night leading to a hollowing out of the town centres. The policy needs rewriting.</p> <p>I would want assurance that lighting is sufficient to ensure security of local residents and also safety in that people need to see where they are walking to avoid falls risk.</p>	<p>The policy clearly allows for lighting necessary for these purposes. The ILP guidance also refers.</p>	

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H12	In general I support his policy but some areas, for instance Weydown road, are currently not lit adequately to allow safe walking on the pavements (particularly in autumn) as the light levels change so much between area under and between street lamps that you cannot see the ground in the darker areas unless you wait long enough for your eyes to adjust (too long if you are trying to walk home; especially if it is cold and raining) or use a torch. If the current lighting meets the E3 standard shown on the map then it is the use of the E3 standard I disagree with. The key to good non light-polluting street lighting is not so much lumens levels but direction of light (downward not upward) by appropriate selection and separation of lighting types	Comments noted. The NP applies only to planning applications and cannot direct WBC in respect of its wider street lighting responsibilities.	
H12	I am concerned about the many houses that have super bright, movement sensitive LED external lighting. Some are so bright as to actually be a hazard to road users. Active steps should be taken to mitigate such bright spots.	Policy H12(ii) requires lighting to be at the lowest practical lumen value and to avoid adverse impacts. The Clean Neighbourhoods and Environment Act 2005 gives local authorities powers to deal with artificial light that is prejudicial to health or a nuisance.	
H13.1	Lion Green should be one of these. It's an omission to call it simply a 'green finger' when all main home-grown based events in Haslemere occur here.	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 (including Lion Green) have been re-classified for LGS designation. Full details are contained in the supporting paper 'Local Greens Spaces and Green Fingers Assessment' provided in the evidence base.	The classification of Lion Green has changed from a 'green finger' to a Local Green Space.
H13.1	Enhancing is a very subjective term - I think this needs clarifying and firming up for future generations who might want to use the space.	The policy wording has 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.	Policy wording amended to clarify the difference between a Local Green Space and a green finger and the associated levels of protection.
H13.1	I wholeheartedly support this policy to protect all public green space, and would add that any nearby development that can alleviate pressures on these existing public green spaces should be given extra consideration. For example, the Recreation Ground is used for a range of open sports and for locals walking their dogs - which is not ideal. The Scotland Park development opposite is offering to open up its parklands to the public which will provide an alternative place to walk dogs on level ground. It will also provide 5km of safe pathways which will allow joggers and child cyclists an alternative to surrounding narrow roads.	Thank you for your support! Your comments on the importance of new development being able to increase the amount of green space for community use are noted.	

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H13.1	<p>This policy needs strengthening and clarification of what is meant by 'very special circumstances'.</p> <p>This policy is vague in terms of its meaning of 'very special circumstances.' Although there should be no development allowed on these areas, at a minimum these special circumstances need to be fully explained in detail in relation to the specific green space on which the development is planned.</p> <p>This is a really odd sounding proposal and it sounds as if there are circumstances where building would be allowed on these community spaces. What are 'very special circumstances'? Why not just refuse development?</p> <p>Local Green Spaces should be completely protected from any development unconnected with the maintenance and facilities of the Space itself.</p> <p>Numerous similar comments</p>	<p>Policies for managing development within a Local Green Space should be consistent with those for Green Belts (NNPF para 101). Appropriate forms of development which have policy support in the Green Belt are set out in NPPF Para 145.</p> <p>Unfortunately, there is no definitive list for what will constitute 'very special circumstances' for LGS-designated sites. Each case should be assessed on its own merits with consideration given to the need to protect, enhance and sustain its value to the community.</p> <p>Policy wording for both H13.1 and H13.2 has been revised following discussion with an independent planning consultant employed to perform a Health Check on the NP.</p>	<p>Policy wording for both H13.1 and H13.2 has been amended.</p>
H13.1	<p>Consider rewording this policy to indicate the protections LGS designation provides rather than mentioning that development could occur. Adding Local Green Spaces to the glossary and explained there what the protections are that it provides may be an alternative. Is the last sentence inviting contributions from developers to enhance the LGSs - I think some have interpreted it as inviting development on LGS</p>	<p>The policy wording has been reviewed in consultation with the independent Planning Consultant employed to perform the Health Check on the NP. New wording clarifies the protections proposed.</p>	<p>Policy wording amended.</p>
H13.1	<p>I don't understand why the Red Court site wasn't included in the green spaces category as it is established that it has 7 endangered Red category wildlife species and is an important habitat for many lesser protected species. It should be added to this list and it should be removed from LPP2.</p>	<p>The Red Court site is in private ownership and cannot be designated as a LGS without the landowner's consent. However, the contribution of this area to Haslemere's ecological network is recognised under Policy H14 which aims to maintain, protect, consolidate, extend and enhance this network and does not permit development that negatively affects or fragments it. This policy also requires developers to demonstrate a post-development achievement of a minimum biodiversity net gain of 20 percent as part of their planning application.</p>	

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H13.1	The very special circumstances are not outlined here, and should be. There may well be some circumstances where I would accept all the above, but I remain unconvinced. It would be helpful if some specific sites were proposed? On every occasion, I would wish to see brownfield, in-fill and existing built areas used first.	<p>Policies for managing development within a Local Green Space should be consistent with those for Green Belts (NNPF para 101). appropriate forms of development which have policy support in the Green Belt are set out in NPPF Para 145. There is unfortunately no definite list for what will constitute ‘very special circumstances’ but each case should be assessed on its own merits with consideration given to the need to protect, enhance and sustain the site’s value to the community.</p> <p>The NP supports your stated wishes in seeking to prioritise development on brownfield over greenfield sites. There is also a presumption against the development of land outside the settlement boundaries, except for development on previously built land.</p>	
H13.1	<p>Haslemere Natural History Society Last sentence: As we said in our Design Statement response, we are concerned about the concept of “enhancing” green spaces and urge that the word be replaced by “conserve”. We recommend the paragraph concludes “consistent with its significance to wildlife and the local community.” Where green spaces are semi-wild, plants such as stinging nettles and brambles should be retained as loss of these food plants is contributing to decline in pollinating insects such as butterflies and bees.</p>	These are important and valid comments. Issues associated with protecting/enhancing green spaces that are important for wildlife are addressed under Policy H14.	
H13.1	<p>The Haslemere Recreation Ground on Scotland Lane/Old Haslemere Road should be specifically protected as it is a war memorial and any development other than improvements and updating of the clubhouse should be resisted</p> <p>Numerous similar comments</p>	The importance of this site is recognised which is why it has been put forward for (and has already received) LGS designation under Policy H13.1 which provides protection against inappropriate development consistent with that for the Green Belt.	
H13.2	Green space 12 - by Buffbeards Lane is not a public space? Lion lane should be a local green space	The woodland area between Buffbeards Lane and Vicarage Lane has been proposed for designation as a ‘green finger’ under Policy H13.2. Lion Green has been proposed as candidate for LGS designation under H13.1.	
H13.2	Should this list include the woodland between Sandrock, Shepherd's Hill and Lower Street? Is there free public access to all the areas because they should only be included particularly as ASVI if they can be seen and visited?	<p>This woodland site has been put forward as a candidate for ‘Green finger’ designation under Policy H13.2.</p> <p>Comment about public access: Some areas considered for designation as Local Green Space may already have largely unrestricted public access. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty). Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.</p>	This site has been added to the list of designated green fingers.

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H13.2	A clear definition of a 'green finger' would be helpful here.	Noted. Proposed definition for green finger: 'Green tracts of land that penetrate the built area and provide unique character and value to the settlement'.	Definition for Green finger proposed.
H13.2	There should be no development on these designated spaces under any circumstances. Numerous similar comments	Para 99 of the NPPF confers special protection to green areas of particular importance to local people, ruling out new development other than in 'very special circumstances'. There is unfortunately no definitive list for what will constitute 'very special circumstances' but each case should be assessed on its own merits with consideration given to the need to protect, enhance and sustain the site's value to the community.	
H13.2	This should include the woodland which sits beside Sandrock and between Shepherds Hill and Lower Street. It is an important part of the green, leafy, Haslemere backdrop. Several similar comments	Comment noted - this site has now been put forward as candidate for 'Green finger' designation under Policy H13.2.	This site is now included in the list of green fingers with additional info on its community value incorporated into the LGS and Green Finger Assessment paper.
H13.2	Green Space ref 16 refers to Polecat Valley but the area marked on the map is actually Hindhead Common. Both are extremely valuable green spaces and should be protected, therefore both: - The woodland and clearing (used by both Shottermill schools for athletics) of Polecat Valley as managed by the National Trust between the A287 and Lion Lane, then continuing as private land across to the east as far as Farnham Lane, should be added to the green fingers map. - "Hindhead Common" should be added to the description. Worth noting though that in conflict with the title of policy H13, both of these green fingers actually lie outside the settlement boundary	The maps showing individual sites have been improved for clarity and accuracy. Polecat Copse, Polecat valley and Hindhead Common are included in the list of candidate sites for 'Green finger' designation. Comment on the policy title has been noted – it has been re-titled as 'Green Spaces' and any references to inside or outside the settlement boundary have been removed.	The list of green finger sites and their associated maps has been revised/improved to reflect comments. Policy title has been changed to 'Green spaces'.
H13.2	13.2 includes two fundamentally different types of landscape which require different policies. In the woodland and heath areas (.12, .13, .15, .16) the emphasis should remain firmly on providing habitat including the development of understorey that will protect and encourage birdlife. The importance of protection is indicated by the Reasons for protection comments on.15. In the other areas the status quo suggests broadly similar approaches to the 13.1 sites with more emphasis on native flora.	Comment noted. Issues relating to green spaces that are of particular significance due to their biodiversity value are addressed more fully under Policy H14 which seeks to protect and enhance Haslemere's ecological network.	
H13.2	Is it possible to say "Permission should not be granted for development on these sites during the period of this Neighbourhood Plan (ie: before 2032)"	Paragraph 99 of the National Planning Policy Framework (NPPF) states that sites designated as Local Green Space will be protected against new development other than in very special circumstances and that such spaces should be capable of enduring beyond the end of the plan period.	

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H14.1	This policy needs strengthening. The protected areas within the plan area should be fully classified and explained- eg the SPA and buffer zones which are protected under EU law. Migration of wildlife is extremely complex and relates to a wider ecosystem. If migration routes are impacted by a proposed development, I am concerned that the onus on a developer to demonstrate how the risk is mitigated is not sufficiently specific or ecology led to avoid what may be long term damage to wildlife.	Policy H14 has been revised and strengthened in line with the output from the biodiversity mapping exercise (described in Opportunity 18), consultation comments and discussions with ecology experts. The latest maps and supporting text identify all designated (protected) sites within the Plan area as well as other key elements of Haslemere’s ecological network.	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. New set of maps and supporting text identify key components of Haslemere’s ecological network (including designated sites).
H14.1	Any mitigation should be subject to review over fixed and defined time periods and legally enforceable corrections at developers cost should be carried out. A developers bond should be held to enforce this.	The policy has been revised and strengthened to include a requirement for developers to deliver a biodiversity net gain of at least 20 percent. Mechanisms for monitoring/enforcing delivery remain under review and have yet to be finalised.	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.
H14.1	I strongly support this policy but would welcome more detail on how the key corridors and stepping stones will be identified.	Full details of methodology used can be found in ‘A biodiversity audit of Haslemere’s Ecological Network, Nov 2020’ in the evidence base. Policy H14 has been revised and strengthened in the light of this work and discussions with ecology experts.	
H14.1	I am concerned by the possibility of development which create a risk to the migration of wildlife. These should be resisted in all but the most exceptional of circumstances. It is not clear how the risk can be mitigated satisfactorily.	We agree and the policy wording has been revised/strengthened to address these and related concerns. Proposals that negatively affect and/or fragment the ecological network defined across the Plan area will not be permitted. Additionally, the policy now includes a requirement for developers to deliver a biodiversity net gain of at least 20 percent biodiversity units.	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
H14.1	Excellent, a vitally important topic. Haslemere has important sites and sits right at a corner of the Surrey Hills. Therefore it might be useful to state the significance of connections with adjacent areas, notably the South Downs NP (Blackdown, Marley and onwards south) and the Weald (via Chiddingfold Forest).	The latest text and maps that underpin this policy show the key elements of Haslemere’s ecological network including designated sites and the key green corridors that connect them with adjacent important areas in Surrey, West Sussex and Hampshire.	
H14.1	This clause appears to assume that planning has been granted on preserved land.	A development proposal should comply with all of the policies in the Neighbourhood Plan. Policies H1 and H3 define where development can take place.	
H14.1	Connectivity for wildlife is paramount and should not be diverted or mitigated. Once lost it cannot be recovered as proved in many other areas.	We agree and the policy has been revised and strengthened to protect and enhance connectivity across Haslemere’s ecological network. The key components of this network are clearly identified across the Plan area.	

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H14.1	<p>Policies worded like the above are at risk of being nothing more than 'green wash'. You are inviting responses to agree to the principle of allowing councils and developers to build on protected wildlife habitats and stepping stones when Haslemere's citizens have clearly expressed their wishes to protect these biodiverse habitats. This question implies that mitigating measures of some unspecified kind would make that acceptable to the community.</p> <p>The woodland wildlife corridors are under review (Surrey Wildlife Trust). Mitigation is not possible and these historic paths should be left where they are and the housing located to a suitable area.</p> <p>Developments should not be permitted that create a risk to wildlife migration, regardless of mitigation. I do not support development of land that lies within AONB or AGLV, or green field sites, outside the settlement boundary.</p> <p>Numerous similar comments</p>	<p>There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these "higher" planning rules in order to meet the Basic Conditions. Policy H14 seeks to protect the ecological network where development comes forward because it meets the exceptions for building on protected land that are contained in the National Planning Policy Framework. The policy wording has been extensively revised and strengthened in ways that we believe should fully address the concerns raised. These changes are underpinned by a desk-based audit of Haslemere's entire ecological network and discussions with ecology experts including Surrey Wildlife Trust. Proposals that negatively affect and/or fragment the ecological network will not be permitted. Additionally, the policy now includes a requirement for developers to deliver a biodiversity net gain of at least 20 percent biodiversity units. including a requirement for developers to deliver a minimum 20 percent Biodiversity Net Gain on all development sites.</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>
H14.1	<p>The principle of net biodiversity gain is very problematic. No credible calculation has yet been established as an independent arbiter to determine how "gain" off-sets "loss." To nudge respondents into accepting this as a basis for a loophole to develop protected AONB/AGLV/protected wildlife habitats/stepping stones goes against the principle stated out the outset, that the Neighbourhood Plan has been established to reflect the wishes of the Haslemere community as to what kind of development they favour, and the majority clearly expressed the view that they do not want large-scale developments on protected land.</p>	<p>We agree that thinking on the principle and practical application of net biodiversity net gain is evolving rapidly and we are consulting with experts from Surrey Wildlife Trust and Natural England to revise and strengthen our policy in this area. These discussions are reflected in the latest version of Policy 14 which will continue to be refined/updated as required.</p> <p>Re comments on AONB/AGLV/other protected land: There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these "higher" planning rules in order to meet the Basic Conditions. Policy H14 seeks to protect the ecological network where development comes forward because it meets the exceptions for building on protected land that are contained in the National Planning Policy Framework.</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>We will continue to monitor latest developments with biodiversity net gain and associated metrics and further refine/update the policy will be updated as required.</p>
H14.1	<p>The policy should also actively encourage the creation of new wildlife corridors and stepping stones. Supporting wildlife through protecting and recreating corridors and stepping stones is essential given the biodiversity crisis and the massive loss of wildlife locally and throughout the country that has taken place in recent decades.</p>	<p>We agree! The revised and strengthened policy wording explicitly addresses these concerns.</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>

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H14.1	I'd prefer "proposals that create a risk must include specific measures to mitigate"	Policy wording has been revised and strengthened following discussions with ecology experts. Developments that negatively affect or fragment the ecological network will not be permitted. Furthermore, there is now a requirement for developers to deliver a 20 percent Biodiversity Net Gain on all development sites.	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
H14.1	Any risk must be mitigated and WBC must seek appropriate input from environmental bodies to protect habitats, breeding grounds etc	Noted.	
H14.2	This policy is not strong enough. Any development that risks causing harm to biodiversity and local ecology should be refused not just 'resisted.' Any plans that risk damaging the precious natural environment around us should not stand a chance of being carried out considering how important the environment is to our community and livelihoods.	Policy wording has been revised and strengthened. Developments that negatively affect or fragment the local ecological network will not be permitted. Additionally, developers are now required to deliver a minimum 20 percent Biodiversity Net Gain on all development sites	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
H14.2	This policy is too weak. Proposals should be refused rather than just "resisted" if they cannot show no harm. Net biodiversity gains and metrics are open to manipulation and certainly offsetting outside the Plan area or the property must not be acceptable.	Policy wording has been revised and strengthened and we continue to consult with ecology experts especially with regard to the rapidly evolving field of biodiversity net gain and associated metrics. Developments that negatively affect or fragment the ecological network will not be permitted. There is also now a requirement for developers to deliver a biodiversity net gain of at least 20 percent in all sites. In exceptional circumstances where a biodiversity net gain cannot be achieved within the development site then off-site biodiversity offsetting will be permitted with priority given to offsetting schemes within the two Biodiversity Opportunity Areas within which Haslemere lies. We will continue to monitor latest developments with biodiversity net gain and associated metrics and further refine/update the policy will be updated as required.	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.
H14.2	The wording "will be resisted unless" also implies the reverse: that they will not be resisted if the conditions are met, irrespective of other circumstances and protections. Replace: "will be resisted unless they are able to" with "must as a minimum measure"	The need to strengthen policy wording has been noted and addressed.	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
H14.2	ALL new development should be measured against the Building For Nature standards where the end result is a net gain in biodiversity.	Policy wording has been revised and strengthened. All new developments are now required to deliver a net biodiversity gain of at least 20 percent as calculated using nationally or locally recognised metrics (e.g. Defra's Biodiversity Metric 2.0).	Policy revised and explicitly incorporates a requirement on biodiversity net gain.

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H14.2	Developers will (and do) take this policy and assume that they can factor into their development plans the building of a positive biodiverse environment allowing them to tick the 'net-gain' box adjacent to their proposed development. Damage to the existing mature ecology for the sake of development cannot be replaced by new green spaces. As mentioned above, positive 'net impact' is a term which can be disingenuous and misleading	These are valid concerns. In response, the policy has been revised with new development proposals required to demonstrate how they enhance and link into the existing ecological network and contribute to its consolidation as well as maximising opportunities to create new ecological assets. Additionally there is a new requirement to deliver a minimum biodiversity net gain of 20 percent.	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
H14.2	Large-scale development on wildlife corridors and stepping stones causes biodiversity loss and leads to wildlife depletion and the disruption of wildlife migration. Full stop. I don't think this should exist as a loop-hole to allow developers to build on AONB/AGLV/wildlife corridors/stepping stones, allowing them to bring in the bulldozers, lay down masses of tarmac, put up tons of bricks etc, and then plant a few trees, add a few bat-boxes and hedgehog holes, and then say, on balance the biodiversity levels seem about right... I think the Plan should commit to protecting these areas from being built on.	There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these "higher" planning rules in order to meet the Basic Conditions. Policy H14 seeks to protect the local ecological network where development comes forward because it meets the exceptions for building on protected land that are contained in the National Planning Policy Framework. The policy has been extensively revised and strengthened and includes a requirement for developers to demonstrate the post-development achievement of a minimum 20% increase in biodiversity net gain in support of their planning application.	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
H14.2	These mitigations should be thoroughly vetted and developers should be obliged to enhance them if they are not proven to be effective.	Comments noted. The policy has been strengthened with developers now required to demonstrate the post-development achievement of a minimum 20 percent increase in biodiversity net gain in support of their planning applications.	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
H14.2	Haslemere Natural History Society We are not sure whether the paragraph adequately covers the following: green fingers as wildlife corridors often feature rivers and streams and their margins need to be preserved for wildlife. Development should be resisted if it involves tampering or draining adjacent land.	Rivers, streams and ponds are explicitly recognised as important elements of Haslemere's ecological network and are covered under this policy. Development that negatively affects such areas and/or fragments the network will not be permitted.	
H14.3	This policy needs strengthening, new developments should not be causing 'significant harm' to wildlife.	The policy has been significantly revised and strengthened. Development proposals that negatively affects and/or fragments Haslemere's ecological network will not be permitted.	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
H14.3	Mitigation should be reviewed over time and developers liable at their cost for any corrective actions to correct issues. Suggest a developer's bond held to ensure performance.	The policy wording has been revised with developers now required to demonstrate the post-development achievement of a minimum 20 percent increase in biodiversity net gain in support of their planning applications. The need for post-development monitoring/review is noted.	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
H14.3	the risk mitigation should be fully detailed and with a full mitigation so all wildlife is protected fully	Developers are now required to demonstrate the post-development achievement of a minimum 20 percent increase in biodiversity net gain in support of their planning applications.	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

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H14.3	'Bordering' is a key word here so proximity and scale matter. Dark skies might be important.	H14 has been enhanced and the following added to better explain the issues of sites bordering the Ecological Network "Protect and enhance features of biodiversity interest on and adjacent to the development site, incorporating and integrating them into development proposals, maintaining appropriate buffer zones between new development and the green network". The dark skies policy H12 has been enhanced with the following wording "Particular care should be taken in ecologically sensitive areas such as near ponds, lakes, rivers, areas of high conservation value; sites supporting particularly light-sensitive species of conservation significance and habitat used by protected species. In these situations, installation of appropriate lighting should be guided by the nature of the species found on or close to the site."	H14.3 and H12 policy wording amended
H14.3	Not only is it important that ALL developments produce a net gain in biodiversity, they should also align with the CPRE's 'call for better access to Nature' - where there is an opportunity to enhance safe access to countryside.	The policy has been strengthened to required that on all sites, development will result in a biodiversity net gain of at least 20 percent. Additionally, the benefits of improving public access to Nature are recognised in Policy H13 where green spaces of special significance to the community are identified and protected against development.	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
H14.3	I note that the statement above refers to development within the Plan area, not outside. I would like it be made clear in the policy wording that these protected categories of land are not targeted by councils or developers over brownfield, in-fill or other low ecological value categories of land in the Plan area. I would like more details on the suggested protections (Section 106?), about which nothing has been mentioned here.	Policies H1 and H3 define where development can take place and these policies have been amended to clarify that designated land should only be developed where the exceptions within the National Planning Policy Framework that permit such development have been met. H14 has been enhanced with more specific details of the protections required.	Policy H14 amended
H14.3	To permit development on the grounds of spurious net biodiversity and mitigation is pure hypocrisy if at the same time councils seek to promote themselves as responding to, and respecting, growing and widespread public desire to protect their local environment and biodiversity. Both 14.2 and 14.3 ask the public to give tacit approval to a policy that would potentially allow developers to target protected land ahead of brownfield sites, in-fill or other available built land on the understanding that if they employ a posh consulting firm they can wipe out the wildlife and destroy habitats and chop down trees as long as they are seen to offer and document some unqualified and unquantified remedial actions. The potential for abuse by developers to degrade sites ahead of, and after planning permission, is a major, unacknowledged problem.	There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these "higher" planning rules in order to meet the Basic Conditions. Policy H14 seeks to protect the ecological network where development comes forward because it meets the exceptions for building on protected land that are contained in the National Planning Policy Framework. The policy has been significantly strengthened to require that developers demonstrate the post-development achievement of a minimum biodiversity net gain of 20 percent in their planning applications. Developments that negatively affect key elements of Haslemere's ecological network or fragment the network will not be permitted.	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

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H14.3	Propose that any development proposed outside the Settlement Boundary and on the AONB or AGLV land shall preserve all wildlife corridors and wildlife stepping stones as these cannot be mitigated or moved.	The key components of Haslemere’s ecological network including important wildlife corridors have been identified and mapped. Policy H14 seeks to maintain, protect, consolidate, extend and enhance this network across the entire NP area including AONB/AGLV land with wording revised and strengthened following discussions with ecology experts (including Surrey Wildlife Trust and Natural England). Development that negatively affects or fragments the network will not be permitted.	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
H14.3	"mitigate significant harm" should be "remove any significant harm".	Policy wording has been revised and strengthened. Development that negatively affects Haslemere’s ecological network will not be permitted.	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
H14.3	I support the protections offered by this policy with the following qualifying remark, and please see my comments above. Developers will use this policy, if allowed, to assume they can commission net biodiversity gain and mitigation measures whilst causing significant harm to wildlife, biodiversity and the environment. It's very important to have robust measures in place to protect wildlife corridors and stepping stone landscapes.	The policy has been revised and strengthened to address these concerns particularly with regard to requirements for developers to demonstrate the post-development achievement of a biodiversity net gain of at least 20 percent in support of their planning applications.	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
H15		Policy has been renumbered to H16	Policy renumbered
H15.1	There are some sites which simply aren’t commercially viable. To insist on a 13 month policy risking someone’s bankruptcy where this is the case is a very “computer says no” attitude. A touch of common sense should always be allowed to prevail over a policy where appropriate.	There is sufficient flexibility in the policy application regarding the 12 month period.	
H15.1	12 months compulsory vacancy is unacceptable. DELETE Plans should not intervene in the market to this extent. A much more flexible Use Class Order would be very helpful in putting scarce resources to their best use over time. This plan cannot change the UCO so should be silent on this matter.	There is sufficient flexibility in the policy application regarding the 12 month period.	
H15.1	Reduce the timeline to 6 or 9 months.	There is sufficient flexibility in the policy application regarding the 12 month period.	
H15.1	There is always concern that developers who want to convert buildings from "employment" to housing (which would make them more money) might attempt to subvert the system. Perhaps in this instance the period should be longer, to try and encourage retaining the "employment" or business use.	There is sufficient flexibility in the policy application regarding the 12 month period.	

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H15.1	I agree with the policy in principle, but the fact of the matter is that Haslemere is changing and the nature of work in the area is changing. Town centres are evolving, the types of places where people work are changing and the nature of work that is likely to be done in the area is changing so we should not be too hung on up on site by site changes but rather support general trends.	There is sufficient flexibility in the policy application regarding the 12 month period. There is now flexibility to change between use classes.	
H15.1	You cannot and should not seek to freeze employment in this way- employment will change and ways to work and places to work will be found- the challenge to micro and small business is the business rates system and overheads not availability of space	Noted unfortunately Neighbourhood plan policies cannot address business rates and overheads.	
H15.1	The turmoil created by the Coronavirus issues will significantly affect the structure of the town over the next decade as commuting is reduced and different facilities are required in and of the town. It may need to be a social and commercial hub for a revolving population that will require a different social cross-section of people to enable some dramatic changes that have been trialled over the past month or so and which, in all probability, will change the structure of local society	Noted	Section about Covid 19 added to Neighbourhood Plan
H15.1	Beacon Hill has lost much commercial property to housing development over the 40 years I have lived here. The village, visually unattractive at the best of times is now also less interesting with many fewer jobs.	As noted at policy H17 Context and Reasoned Justification an Article 4 direction for Beacon Hill to protect commercial property for permitted development has been obtained.	
H15.1	I wonder whether the number of shops in Haslemere/Weyhill are genuinely sustainable. I don't know how this policy applies to potential accommodation above shops but have the impression that there is space within the town centre which could become residential. Given the atrocious design of the BT building and the Kia garage right in the town centre I would much prefer to see housing there (and on the location of the current fire station) in keeping with the design statement.	Policy H17,2 (now H17) addresses the conversion of floors other than the ground floor of retail premises to residential use. The BT building and Kia garage are part of the West Street site which is allocated for development by Waverley Borough Council.	
H15.1	We have to face the radically changing employment patterns e.g. local banks closing because so much business is done on line. There will be occasions where the nature/scale of the employment is so pivotal to Haslemere that the site should be subject to the kind of control referred to above. But to my mind in the majority of cases the prompt conversion of an old police station or bank into desperately needed accommodation is the obvious way forward. There is an unsustainably large number of small businesses in Haslemere. Better to keep the centre vibrant with accommodation for (young) families.	Policy H17.2 (now H17) permits conversion of floors other than the ground floor of retail premises to residential use. These policies should assist in creating a balance between residential and retail uses in the main shopping areas.	

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H15.1	I think local council & local trade and business groups could have a role in ensuring all avenues have been explored in securing a business use/ local enterprise before they are turned over to residential use.	Noted but unfortunately this is not something the Neighbourhood Plan policies can address.	
H15.1	if a building was economically sustainable in its current use then a developer or the owner would not be changing it. The fact is our high streets are too large - we need to plan the change of use of weyhill to consolidate the retail in west street and haslemere high street	There has been strong support in consultations for connecting the two parts of Haslemere – Wey Hill and the High Street/West Street. They are each significant retail centres.	
H15.1	As noted elsewhere, there may need to be some big picture planning that a small landowner cannot do, especially related to the land behind the station should that area need development for housing / transport reasons.	See Opportunity 2	
H15.1	I think it is a healthy thing to bring a diversity of homegrown rather than high street companies to our Village/Town. If a premises has not been able to be let I believe there should be a process of asking why? Is the rent too high? Is there a lack of incentive or support? Have the correct people been asked? Is there a plan for the type of business needed for Haslemere? I understand that if a property isn't used then it should be put to good use. But is good use another hairdresser or another estate agent? If more housing is built is there the infrastructure to support it?	Noted but unfortunately this is not something the Neighbourhood Plan policies can address.	
H15.1	The plan should provide for assistance to mitigate the potential for change of use on a site specific basis such as reducing or waiving Business Rates or providing grants. It should also identify areas where there is potential for change of use and explore ways of reducing that likelihood. e.g.Beacon Hill - lack of footfall. For example by providing infrastructure such as parking.	The Neighbourhood Plan cannot include policies relating to business rates or grants.	
H15.2	It all depends on the type of employment a Class B1 office space will be replaced with. For example a B3 storage and distribution business would be inappropriate in a central town location. Unless the other uses will have a negative impact on the area. So changing, for example, from a shop to a nightclub would not be supported. More specificity of the nature of those businesses is required	The policy has been amended to specify the use classes that changes are permitted between.	Policy H16.2 amended.
H15.2	Such changes of use should not be detrimental to the existing quality of life. Employment is not the only issue here. Suitability should be scrutinised for possible adverse effects eg change of traffic use and frequency.	Additional wording added to policy “subject to considerations of traffic generation, parking, noise and other forms of pollution, and provided they respect the character of their surroundings by way of scale and design”.	Policy H16.2 amended.

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H15.3	I support this subject to conformance to other policies	Planning applications must take account of all policies in the Neighbourhood Plan.	
H15.3	Other aesthetic / maintaining character requirements should also be met	These are included in policy H11 Hedgerows, trees and woodland and H9 Access and Transport.	
H15.3	care is needed that businesses are not sacrificed to nimbyism- viable businesses need to be supported even if there is some collateral discomfort sometimes- little is more miserable than unemployment over the long term	Noted	
H15.3	The policy should include positive means to mitigate adverse effects of new development by providing advice and guidance, grants and complementary developments such as parking, bus routes and clear pedestrian/cycle routes.	Policy H9 Access and Transport addresses some of the issues but only to the extent that these issues can be addressed by a Neighbourhood Plan	
H16		Policy H16 renumbered to H15	Policy renumbered
H16.1	Existing sites should be utilised before creating new premises unless the existing sites are inappropriate.	Noted	
H16.1	We should all remember that all to-day's "big businesses" (e.g. Tesco and many others, especially those which grew up in the original Industrial Revolution) all started as what we now call Micro-businesses. Not all of these micro-businesses, today, will succeed (as they haven't in the past) but they represent the future and need to be given opportunities. Similarly, "small" businesses still represent the majority of business nationally and, especially in the Retail and the Hospitality sectors they are what differentiates individual towns (like Haslemere) from those which suffer from the decline of the 'High Street', and the beating heart of communities, caused by out-of-town shopping centres paying reduced business rates. We should do all we can to encourage small businesses to thrive.	Agreed this is a key aim of the Neighbourhood plan policies	
H16.1	Consider adding same wording about noise pollution etc as appears in H15	Wording added	Policy H15.1 amended
H16.1	This is very generic and size is not the most important factor. What sort of businesses are you expecting to be attracted to Haslemere? There is a fundamental difference for example between artisanal growers/producers, tech business or even financial services. Haslemere needs to stand for something.	Wording amended to remove reference to micro and small businesses.	Policy H15.1 amended

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H16.2	<p>High quality IT, whether 5G or anything beyond that, is vital for any business today. It is the natural development of the 'quill pen', the adding machine, and early computers. It is Not and added extra' or a 'luxury' - it's an essential business tool to ensure that the nation, not just our local community, can thrive in the modern (post-Brexit and post-Covid) world.</p> <p>There are still businesses which can work quite efficiently without high tech stuff - manual work type of businesses, hands on stuff- we don't all revolve around computers</p>	Noted	
H16.2	<p>I understand your point and agree with it to some extent, but would like to understand the application of the policy better. By way of example, if a wonderful organic jam manufacturer wanted to convert a premises into a farm shop and visitor centre, which may have little or no need for IT and coms your policy would restrict this and it could arguably be a wonderful addition to the community and visitor attraction. This is just a hypothetical example, but it highlights a flaw in you policy.</p>	<p>The Covid 19 pandemic has demonstrated the importance of communication and information technology. When new premises are developed suitable infrastructure should be included. This will provide more flexibility for the future use of the premises also.</p>	
H17.1		<p>This policy was removed as WBC when consulted noted that it is not something that can be addressed by Neighbourhood Plan policy.</p>	H17.1 removed
H17.1	<p>The general gist of this Policy and the wishes of the community is understandable and worthy but is now out of step with the reality of current and future retail trends. The Town Centre Retail Study is 7 years old and no longer reflects the accelerating changes in shopping habits. This particularly applies to small independent retail establishments as is evident in our neighbourhood and throughout the Borough. So, even if LPP1 does provide protection for the ground floors of premises, these changes cannot be wished away and ignored thereby allowing a dispiriting vista of boarded-up shop windows to appear and spread. Far better to sympathetically convert the whole building/premises to much needed residential housing to the benefit of the town and to the benefit of that section of the population seeking town-centre accommodation. If it is felt that the ground floors of certain (High Street?) buildings deserve and require special protection (which they might well do), then surely it would be better to individually specify/protect the buildings in question rather than impose a blanket requirement on all retail premises. The intention to obtain Article 4 directions does not appear to specifically include the retail sections of Lower Street and Petworth Road; they should be added to H 17.1, if it is intended to protect them as well. Proposed Amendments to Policy Statements H 17.1 Add “ Lower Street/Petworth Road” after West Street.</p>	<p>See above this policy has been removed although Article 4 directions will be sought by the Town Council for Wey Hill. The West Street/High Street area is protected since planning permission is required as it is within the Conservation Area.</p> <p>Policy H17.2 (now H17) protects the ground floor of business premises in the primary shopping areas defined on LPP1.</p>	

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H17.1	Haslemere is extraordinarily fortunate to have such variety of retail premises, even if this variety has been sadly diminishing in recent years, so anything which retains and enhances the variety can only be beneficial.	Noted	
H17.1	I do not know what article 4 directions are? It would be useful to add a description on an "Article 4 Direction" to the Glossary.	Additional explanation added to Context and Reasoned Justification	Context and Reasoned Justification amended.
H17.1	Restricting permitted development would have a negative impact. The primary reason is that retail use alone for the high street is now an outdated concept as a result of the structural trends in the retail sector. The consequence of this is seen in larger towns throughout the UK where a number of retail units lie vacant as landlords are unable to attract occupiers. Invariably it means there is too much retail stock and so policy should encourage landlords to come forward with viable alternative uses if it can be demonstrated that retail use is no longer viable.	Policy H17.2 (now H17) amended to state encourage retention of Class E uses (shops, financial and professional services, food and drink, business, non-residential institutions, assembly & leisure) on the ground floors and changes of use on other floors.	Policy H17 amended.
H17.1	Not sure this is right retail is going through huge transformation and current situation is only going to make situation worse. We must accept that we will have far fewer retail units and must have flexibility to permit other uses whether they be residential or small business users.	See comments above	
H17.1	Much as I wish to see a vibrant retail sector throughout our area, it is inevitable that retail will contract, and nothing is worse than a high street of closed shops like broken teeth. If owners find conversion to domestic better than continuing with retail, then they should be able to convert or we will have a miserable run down appearance to our streets. There are already many empty properties in Haslemere. An empty shop is a missed economic opportunity but it is better to be used even as a home than left empty. Let market forces dictate what is best.	Policy H17 .2 (now H17) will permit this. The article 4 direction only requires that a planning application is submitted for changes from retail to residential. The application can be accepted if it meets other national local and neighbourhood plan policies.	
H17.1	AND all commercial and entertainment establishments along Beacon Hill Road.	An article 4 direction has been obtained for this area.	
H17.1	Actively promote the conversion of non-ground floor premises to residential units in these areas. The existence of multiple, small residential units (often for young or older people with no cars) will provide the lifeblood necessary to sustain small retail units. Where units go back away from the road, subdivision to provide a residential unit at the rear should also be promoted, even though at ground level.	Policy H17.2 (now H17) supports this.	

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H17.2	The Policy should be amended to require that change of use to residential will only be allowed if there is sole use parking provision or that Waverley B.C. has already provided additional parking provision in the town centre.	Applications would need to comply with H9 Access and Transport which addresses parking for residential development.	
H17.2	As long as existing commercial premises are not lost to residential, as this could be a loop hole to converting the whole premises to residential due to it less desirability to commercial tenants	Policy H15.1 (now H16.1) seeks to protect existing employment uses from conversion to residential requiring that it is demonstrated that continued employment uses are not viable.	
H17.2	Retail faces huge challenges in the next few years, while increased housing, particularly smaller, affordable dwellings, is needed. A policy that tries to retain the same level of retail space in Haslemere is almost certainly doomed. The policy should instead recognise this trend and accept that a proportion of retail space will have to be converted to residential use.	The policy has been reworded to protect class E uses in the primary shopping areas	Policy H17 amended.
H17.2	Policies H 17.2 H 17.2 Delete “floors other than the ground floor of”. Replace “the operation of the retail premises” with “the character of the town” so as to read: Applications for change of use to retail premises will be supported provided that the applicant can demonstrate that the change of use will not have a negative impact on the character of the town.	The policy has been reworded to protect class E uses in the primary shopping areas	Policy H17 amended.
H17.2	It is important to keep the central town areas occupied at night through the provision of flats above retail spaces, as this enhances security and helps retain vibrancy and custom for restaurants.	Noted	
H17.2	Given the pressure on the retail sector, the policy should be more flexible..... ie in some situations the total floor space of the buildings should be allowed to be altered	Applications can be made to change all of the premises from retail. Policy H17.2 (now H17) aims to retain class E uses in the primary shopping areas so that retail and business premises are in a consolidated area where possible. Permitted development in areas where there is no Article 4 direction would allow a change to residential. In areas with an Article 4 Direction (currently Beacon Hill and in the future Wey Hill) or in the conservation area, under H15.1 (now H16.1) change of use to residential could be sought but evidence that employment uses are no longer viable would be required.	
H17.2	Other floors may also be employment spaces such as lawyers, accountants, consultancy rooms etc. This policy could contradict the desire to retain employment. These applications should also be required to demonstrate that a genuine effort has been made to find another business use.	Such changes of use would need to comply with H15.1 (now H16.1) (see comment above)	
H18.1	Despite good rail and bus services, the majority of visitors would travel by car, increasing pollution, noise and congestion.	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	Policy removed
H18.1	This seems in conflict with housing policy	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	

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H18.1	This would seem to support the blight that is Air BnB and the like. I would rather see a presumption against conversion to hotels and the like unless they can clearly show that it will have no negative impact on local residents.	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.1	There is a risk that smaller hotels, B&B's/AirBnB's could draw customers away from the main hotels which may struggle to survive. I would prefer that each application is considered individually, to include the provision for parking and noise/nuisance control	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.1	As long as a hotel would be in keeping with the area. E.g. Near station, on high street or near town centre is OK. Building a new hotel in a mostly residential area would not be OK.	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.1	I simply do not think there is established demand- see the travails at the Georgian and it will just make more troubles for the future- obviously	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.1	Is the problem the shortage of hotel rooms? The Georgian House Hotel and the Station House Inn both struggle to fill their existing room capacity so if there is a plan to increase the supply of rooms we need to know what the plan is to increase the demand for those additional rooms. Also, has consideration been given to online market places for accommodation such as AirBnB?	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.1	Surely this will only make more challenging the task of achieving the number of additional housing units required of Haslemere.	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.1	I do not think that this is worthy of being a stand alone policy. Hotels and accommodation do not need to be a priority for Haslemere and the support of the hospitality industry in general can come within the general support for new business development. Having a policy such as the one proposed would risk continuing such planning disasters as the long fight over the Georgian Hotel. The policy 18.2 below is already sufficient.	Policy H18.1 removed as development of hotels would be permitted under policy H18.2.	
H18.2	Why would you build amenities for tourists but not allow building by residents in out of settlement areas especially as the noise and blight to the landscape is likely to be worse. These areas are worth maintaining for the wildlife etc value and no development should be permitted at all.	Policy H3 relates to building outside the settlement boundary which may occur when the exceptions to the protections in the NPPF or Local Plan are met and on previously built land. Policy H14 ensures consideration is given to Haslemere Ecological network.	
H18.2	Ok save for developments outside of the settlement boundary.	See above	
H18.2	The overall policy aims of encouraging an expanded visitor economy, promoting Haslemere as a visitor destination and improving the ease and visual attractiveness of access to the South Downs National Park, and other countryside, from the station are welcome. The semi-rural and rural character of the approach to these assets, and the public	Policy H9 addresses these issues.	

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	footpaths through the Surrey Hills AONB, are uniquely close to the station and well-used by ramblers who arrive and leave by train. The value of these approaches from the station should therefore be taken into account in the local planning process. Any support to recreational and leisure developments in the AONB should acknowledge the established rules for these areas, and any extra protection measures should be compatible with them. Unacceptable increases in motor traffic should be avoided.		
H18.2	I think it is important to add a provision that it must not adversely affect local residents	The policy states that development should be “appropriate in terms of amenity to residential neighbours regarding the effects of traffic generation, parking, noise and other forms of pollution.”	
H18.2	I think it would be important to cross reference the policies regarding building materials, appearance etc	Planning applications must comply with all the Neighbourhood Plan policies	
H18.2	We need more leisure facilities e.g. outdoor pool or Lido.	Noted	
H18.2	This is all admirable but some proposals may involve quite substantial buildings and the siting of these will be crucial.	Policy H3 relates to building outside the settlement boundary which may occur when the exceptions to the protections in the NPPF or Local Plan are met and on previously built land. Policy H14 ensures consideration is given to Haslemere Ecological network.	
H18.2	It should be required that there is no increase in car traffic or pollution, so visitors should be required to come by public transport. If this cannot be managed, there should be no development. Parking should not be increased, as this simply increases traffic flow.	Policy H9.2 deals with changes in traffic due to development.	
H18.2	Two points: this should not be at the expense of what is surely the overriding objective of meeting the housing targets set for Haslemere - and doing so within the proposed formal settlement boundaries; where developments of the kind envisaged in H18.2 are to be looked on favourably it should only be on an existing built site	Policy H3 relates to building outside the settlement boundary which may occur when the exceptions to the protections in the NPPF or Local Plan are met and on previously built land. Consultation responses indicated support for developing the visitor economy and retaining employment uses where possible.	
H18.2	I cannot imagine how this could be possible on the roads we currently have and I am concerned about additional noise in our beautiful serene countryside.	The policy states that development should be “appropriate in terms of amenity to residential neighbours regarding the effects of traffic generation, parking, noise and other forms of pollution.”	
H18.2	Consideration given to the impact on wildlife	Policy H14 ensures consideration is given to Haslemere Ecological network.	