

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

Representations, comments and issues raised - Savills on behalf of Redwood South West Limited	Response	Suggested actions
<p>Policy H1: Designation and purpose of the Settlement Boundaries</p>		
<p>On page 13 Policy H1.1 of the HNP notes the preparation of a settlement boundary. The way that this is described seems as though its purpose is to restrict growth beyond the existing urban development in Haslemere. Redwood therefore does not consider that the HNP has been positively prepared as it is seeking to restrict the ability of the town to meet its housing needs. Whilst it is essential to protect the most valuable countryside, there is a finite amount of development that is plausible within the existing urban area. Furthermore, many of the sites put forward at this stage have issues affecting their deliverability. Policy H1: Designation and purpose of the settlement boundaries, seeks to adopt formal settlement boundaries within the Plan area, Figure 1a shows a draft boundary for Haslemere, with figures 1b and 1c showing settlements boundaries for Grayswood and Hindhead and Beacon Hill respectively. Redwood objects to this on the basis that it does not seek to be proactive or account for the draft allocations in LPP2, that will otherwise mean land adjacent to the existing urban area will be developed and form part of the settlement. The Town Council and Haslemere Vision is reminded that Neighbourhood Plans must be in general conformity with Local Plans. Redwood does not believe that this policy has even considered LPP2 or its draft allocations. Furthermore, as WBC is making the proposed allocations for housing in the area, not the HNP, it is logical for WBC to also set the settlement boundaries, and not the HNP. This ensures that the allocations made in the Development Plan are fully reflected within the settlement boundary in order to ensure consistency.</p>	<p>It is necessary to set a settlement boundary as the Neighbourhood Plan may precede the local plan and some policies cannot be implemented without a defined settlement boundary. The settlement boundary has been derived based on community consultation. A majority of residents have indicated that they do not wish to see green field land built on before the brownfield sites have been exhausted. There is an acceptance for building at high densities so that housing targets can be achieved. Evidence suggests that the housing need can be met within these boundaries especially since windfall in the NP area has been historically high and is expected to continue at a sufficient rate.</p>	
<p>Policy H1.2 states that “In order to protect our green space, there will be a presumption against the development of land that lies outside the settlement boundaries”. Through Policy H1.1, draft allocated land (as per LPP2) has not been placed within the settlement boundary, thus this policy seeks to prevent potentially allocated sites coming forward. Once LPP2 is adopted, including allocations on the edge of Haslemere, which is inevitable, HNP will become out of date as it will not be in conformity with the adopted local plan. In addition, it is inevitable that windfall development will be required, including the best available Greenfield sites in terms of sustainable development. Again, this policy seeks to prevent this.</p>	<p>As almost all of the land outside the settlement boundaries is designated (Green Belt, AONB, AGLV, Countryside beyond the Green Belt) the NPPF and Local plan policies prevent development except in exceptional circumstances. The policy has been redrafted to reflect this. The NP acknowledges that should LPP2 be adopted subsequently the settlement boundaries in LPP2 will supercede those in the NP.</p>	<p>Policy wording altered</p>
<p>On page 19, Policy H1.3 seeks to be restrictive stating that development should not normally be permitted on AONB or AGLV sites. It says that only “if allocated and windfall sites are not being developed at a rate to deliver the houses needed within the Plan period will it be necessary to allocate one or more sites that include land designated as AONB or AGLV, outside the settlement boundaries defined in the Neighbourhood Plan”. LPP1 has determined that Haslemere needs to deliver at least 990 homes over the plan period, this is an approach that has been adopted and found sound by an Inspector. In order for Haslemere to meet this, it is inevitable that land outside of the draft settlement boundary put forward in the draft HNP, including AONB and AGLV land, will be required in order to achieve this. Policy H1.3 is seeking to stall and restrict this, which goes against the requirements of LPP1. On this basis, this should be deleted from the plan.</p>	<p>Responses to the Regulation 14 consultation indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.</p>	<p>Policy removed</p>

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<p>Whilst in principle there is not an issue with the HNP providing guidance on the density of a development in the town, as worded, Policy H1.5 could result in the inappropriate densities in particular locations. Redwood agrees that it is essential to maximise the use of land, however, a minimum density of 45 dph in areas of AGLV and AONB areas is unlikely to be compatible with landscape constraints and proposed enhancements. The policy should be altered to be more flexible in order to ensure that the town is not inflicting harm to the town’s surrounding landscape. The following changes are therefore recommended (amendments show in red):</p> <p>All new development of more than 10 dwellings should achieve a minimum of:</p> <ul style="list-style-type: none"> · 75dph within 1 kilometre of the station (see 1km of station map evidence list on page 68) · 45 dph within the remaining areas · Within all other areas of the Neighbourhood Plan area, a target density of 45 dph will be sought, taking into account all relevant site and area constraints, including evidence submitted with the relevant planning application. 	<p>Based on consultation responses the policy has been reworded to add flexibility.</p>	<p>Policy wording altered</p>
<p>Policy H2: Development outside the settlement boundaries on existing built land</p> <p>The policy should be altered to refer to LPP2, stating that LPP2 will define the settlement boundary of the town, as it can do this on the basis of the allocations it makes. This policy seeks to restrict any development beyond the draft settlement boundary made by the Town Council. This draft boundary does not account for any essential development of land beyond the existing urban area, which will inevitably be required to meet the town’s housing need. It therefore also fails to take into account the strategic policies and strategy of the Borough Council. It also does not take into account any of the exceptions in the NPPF. If this policy is to be kept, then it should be altered so that it is clear that it applies to land outside settlement boundaries and development allocations. The following text changes are suggested in this instance:</p> <p>“Development outside the settlement boundaries (as defined in figures 1a-c on page 20) as defined by the Waverley Borough Council Local Plan Part 1 and Part 2, on existing land will only be approved if it comprises either:</p> <ul style="list-style-type: none"> · A site that is allocated in the Waverley Borough Council Development Plan (including LLP1 and Emerging LPP2); · A subdivision of existing buildings; or · A modest redevelopment of no more than 40% of the baseline footprint of the property at the base date as established by Waverley Borough Council’s emerging LPP2 or · Any other instance as defined by the National Planning Policy Framework. 	<p>This policy has been combined into H1.2</p> <p>The restrictions on the size of the development have been removed as the NPPF provides sufficient guidance.</p>	
<p>Policy H3: Sustainable Development outside the Settlement – Sustainable Construction</p> <p>Redwood support the objectives and principles of this policy. Redwood’s ambition for Scotland Park is to create a vibrant community with high quality sustainable homes designed to exemplar standards as is evident from Appendices 1.0 and 2.0 to this representation. Scotland Park will be the first development in Surrey, and one of only a handful in the UK, to achieve a Building with Nature ‘Excellent’ accreditation and will surpass the Government’s ‘Building for Life 12’ standards. Also as the policy requests, Scotland Park is able to achieve Biodiversity Net Gain. However, Redwood objects to the policy on the basis that it should apply to all development and not specifically development outside settlement boundaries or on allocated land. The following amendment is proposed (changes in red):</p>	<p>WBC will include further policy on sustainable construction in LPP2 which will apply to all development. The lower residual land values for greenfield land mean there are sufficient resources to achieve excellence in design and sustainable construction more easily than when brownfield sites are developed.</p>	

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<p>All new development outside of the settlement boundaries or inside the settlement boundaries on sites with land designated as within AONB or AGLV:</p> <p>It is also the case that the HNP risks contradiction with WBC’s LPP1 and LPP2, regarding the inferred requirement that development outside the settlement boundary should be developed as community-led, genuinely affordable housing. Good development can still be market-led and include community benefits and a balanced mix of homes, including affordable homes. This requirement should be deleted as it risks contradiction with LPP1 and LPP2. It is however considered that the remainder of the policy reads suitably and provides appropriate policies and objectives to ensure environmental quality is achieved.</p>	<p>Changes have been made to provide flexibility in the policy. The policy no longer addresses the relaxation of the policy rules for community led affordable housing developments since the planning balance for considering community-led housing already allows flexibility in considering the effect of Policy H3.</p>	
<p>Policy H4: Consultation Requirements</p> <p>Redwood believes that consultation is important and fully support that this is a necessity for any development that proceeds.</p> <p>It may be that online based, website advertising of proposals is more proficient. This may suit the modern world, and allow for more flexible way for a wider breadth of the community to be involved, and would certainly be required during the present Covid-19 restrictions. The policy also needs to be made more flexible and adaptable to account for changes in circumstances and demand which may mean different forms of consultation are more appropriate.</p> <p>A development brief could take the form of a draft Design & Access Statement, which could be used for consultation purposes. Redwood does not object to this concept and have prepared vision documents for both Promotions A and B to ensure that the key concepts of the development have been fully explained to the community.</p> <p>Redwood also raise questions over the arbitrary 500m consultation requirement, as this would likely result in a significant amount of material being shared across a number of addresses. It is questionable whether this is either necessary or sustainable. There is potential to share information to a much wider breadth over the internet and anyone with an interest is able to obtain further information in this way.</p> <p>The approach to consultation needs to be adapted to be more flexible and embracing of modern methods of communication. The following changes are recommended (in red):</p> <p>Any development application for 50 or more dwellings is required to be accompanied by:</p> <ul style="list-style-type: none"> i. a published development brief or an appropriate summary of formal public consultation undertaken for the development; ii. a travel plan, to demonstrate how the development will improve local traffic and pedestrian management as required by the Waverley Borough Council Validation Checklist (Surrey County Council have published guidance on writing travel plans available for reference) iii. evidence that the development brief or public consultation has been appropriately shared with the community through the chosen means, including virtual meetings or consultation websites, has been delivered to all residential properties within an appropriate distance of the development site (this will be assumed to be 500 metres unless there are good reasons for the use of a smaller area) and advertised and made available to the wider community iv. a summary of the consultation process undertaken and the responses received from the community summarised within a Statement of Community Involvement, outlining the method of consultation that has been undertaken. The development brief or consultation exercise must include: <p>.....</p>	<p>H4 is renumbered as H8</p> <p>Haslemere has a higher percentage of elderly residents in than Waverley as a whole and therefore methods of consultation are required in addition to online ones.</p> <p>The policy has been amended so it applies to outline planning applications also.</p> <p>A summary of formal public consultation may not provide all of the details that the development brief is required to include. The contents does not exceed those required by Waverley’s Validation list but by providing some of the details in a development brief the community can clearly see important information without navigating the online planning website, which some residents have expressed frustration with.</p> <p>The policy wording has been amended to require the summary of the consultation process to include “how any issues or concerns raised have been addressed in the proposals submitted.”</p>	<p>Policy H4 (now H8) amended</p>

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<p>.....</p> <p>It is acknowledged that the level of detail may be slightly different for an outline planning application, depending on the matters that are submitted for consideration in the planning application.</p>		
<p>Policy H5: Managing the volume of windfall development</p> <p>The policy helps to illustrate the complexities of bringing forward windfall development. However as the HNP is not allocating sites, and should not be defining housing requirements in any shape or form, there is no need for this policy. It is for WBC in the LPP2 to define settlement boundaries and housing allocations and as a result this will in itself define windfall development. All other aspects of the policy are superfluous, for example, housing mix, as these are all covered by other policies elsewhere either in LPP1 and LPP2 or within the HNP.</p> <p>On this basis this policy should be deleted from the plan.</p> <p>Should the HNP retain this policy, which Redwood would not support, then there is a critical need for the suggested windfall allowance to be fully justified and demonstrated with evidence as in conformity with LPP1. This is because the figure suggested in the policy pre-amble (41 dpa) is at odds with the conclusions of the Examining Inspector for LPP1, who set an initial windfall allowance of only 39 dpa across the whole Borough. This is subsequently applied in LPP1, with an increase only in the last 5 years of the plan period (2027 to 2032). It is therefore not clear whether the same criteria has been utilised in HNP to determine the suggested windfall allowance.</p>	<p>H5 renumbered as H4</p> <p>The following words are from the report of an independent planning consultant employed to perform a Health Check of the NP.</p> <p>“It is entirely appropriate for the Plan to make an assumption on the supply of new dwellings from windfall sites which reflects local evidence of how many have come forward in recent years.”</p> <p>We note that the Farnham Neighbourhood Plan has used a local evidence to derive a windfall rate.</p>	
<p>Policy H7: High quality external design</p> <p>Redwood supports Policies H7.1, H7.2 and H7.3. The policy strives to achieve good quality design and respect the character and appearance of Haslemere.</p>	<p>Noted</p>	
<p>Policy H10: Provide an appropriate mix of housing types</p> <p>As summarised in the HNP, the West Surrey Housing Market Assessment (HMA) Waverley Addendum (December 2015) outlines the following housing needs for Haslemere. In terms of market homes, there is the greatest need for 3 beds (34.1%) (modal), followed by 2 beds (32.6%). On the basis of this evidence, you would expect the HNP to reflect this, unless otherwise justified. The HNP should state that:</p> <p>“the housing mix should be in line with the SHMA”,</p> <p>This is because it is likely to be updated on a fairly regular basis and there is no local evidence to justify anything different.</p> <p>On page 33, Policy H10.1 and H10.2 seek to influence the housing mix of development sites of over 10 dwellings. The policy encourages “one and two-bedroomed dwellings” and “smaller dwellings”. The HNP must be deliverable and consistent with LPP1’s evidence base. As per table 4.1 above, this is not consistent with the HMA. Whilst it is clear from the HMA there is a greater need for smaller 1 and 2 bed affordable homes, this is not distinguished and clarified in the draft HNP policy. The Town Council has also not submitted any evidence to justify this departure from WBC’s evidence, notably a local needs assessment. The policy should be worded to encourage the need for a diverse range of properties to meet needs of the Town and Borough as a whole and crucially ensure delivery. It is also essential that proposed development respects the character of the local area. One and two bedroom properties often take form in flatted developments. Whilst the inclusion of this in small areas amongst other houses of different sizes can be deemed appropriate; on mass, in Haslemere, it would be out of character. The policy should also be altered to note that the opportunities for smaller 1 and 2 bedroom properties in the town centre and close to the train station area is greater. This type of development, whether dwellings or apartments, is more</p>	<p>H10 renumbered as H6</p> <p>An independent planning consultant advised that the Neighbourhood Plan can include details of local housing mix requirements</p>	

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<p>appropriate and in character for this location and is more likely to satisfy the higher density requirement of 75 dph. The following change is therefore suggested (amendments in red):</p> <p>H10.1 Developers of sites of 10 or more homes should demonstrate that their development provides an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence of housing need for the area. This is currently in the West Surrey Strategic Housing Market Assessment Waverley Addendum December 2015. Developers are encouraged to include one and two bedroomed dwellings to meet the needs of singles, young families and those wishing to downsize.</p> <p>H10.2 Developments of fewer than 10 dwellings should not be exempt from consideration of the appropriate size of dwellings on the site. Developments that include the provision of a proportion of smaller dwellings will be favourably considered.</p> <p>H10 All new developments are encouraged to provide a range of dwelling types and sizes to meet the needs of the Town and the wider Borough taking into account the most up to date evidence published by Waverley Borough Council, unless a Local Housing Needs Assessment has been prepared more recently by the Town Council, and taking into account the character of existing development in the surrounding area. In the town centre and station area, smaller one and two bedroomed properties will be supported to reflect the character and scale of these locations.</p>		
<p>Policy H9: Provide sufficient affordable housing of the right type</p>	<p>Policy H9 renumbers as H5</p>	
<p>Redwood supports this policy.</p> <p>Scotland Park will deliver a policy compliant level of affordable housing (30%) and through Promotion B, 54 affordable homes would be delivered. This will make a valuable contribution to affordable provision.</p> <p>The Town Council's attention is drawn to the lack of affordable housing delivery on sites in Haslemere to date. A few of the draft allocated sites are below 6 units, which will mean that they are likely to provide no or minimal affordable housing or contributions as a part of their proposals. Moreover, many of the sites are on brownfield land, some of which include land that is likely to be contaminated. Thus, they are likely to argue that the delivery of affordable homes will affect the viability of the scheme. Some examples have been laid out below:</p> <ul style="list-style-type: none"> · DS16: Georgian House Hotel, High Street (WA/2019/1525, 2 dwellings, 16 flats, 0 affordable units, appeal allowed January 2020); · DS19: Rear of 4 Wey Hill (WA/2018/0468, 5 flats, 0 affordable units, granted October 2018); · DS22: 12 Kings Road (WA/2018/1097 5 flats, 0 affordable units, appeal allowed April 2019 and WA/2017/2320 6 flats, 0 affordable units, appeal allowed April 2019); · DS15: Longdene Field (WA/2019/0337, 4 dwellings, 0 affordable). 	<p>45 affordable homes are being built on the 5-21 Wey Hill site and WBC will deliver 38 affordable homes on the Youth Campus site.</p>	

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<p>Policy H11: Habitat protection</p> <p>Redwood supports the principle of policies H11.1, H11.2, H11.3 and H11.4 and principles of biodiversity net gain. However, there are objections to the wording of policy H11.1, which seeks to hinder and restrict development. This is not positively prepared as required by the NPPF and in its current form could restrict suitable sites coming forward when in fact there are ways to overcome these issues designed and enforced by ecologists and other professionals.</p> <p>The key test should be the net gain of trees and biodiversity, which will measure the overall improvements and enhancements made to a site as a part of a development, and the policy should be altered to this effect. Some existing trees may need to be lost to enable the infrastructure to bring forward development, although overall there can still be a net improvement on a site. The following changes are recommended:</p> <p>H11.1 Development that provides a net gain of biodiversity, including trees, will be supported. If a development that damages or results in the loss of trees, of good arboricultural or amenity value, including veteran trees this will not normally be supported unless there is evidence accompanying the application that the loss is required and that there will be an overall net gain of trees and biodiversity resulting from the development. permitted. Proposals should be designed to retain ancient trees or trees of arboricultural and amenity value wherever possible. Proposals should be accompanied by a tree survey that establishes the health and longevity of any affected trees in accordance with the Waverley Borough Council Validation Checklist. Where damage intentional or otherwise does occur prior to or during the development of any site, new trees must be planted, or at a minimum, to compensate for the loss that has occurred.</p>	<p>Policy H11 has been amended in response to the consultation to clarify the wider benefits of trees and hedgerows beyond biodiversity value, e.g. landscape, public amenity and climate change. Use of a single net biodiversity gain metric is therefore inappropriate. Biodiversity provisions, including the requirement for net gain under H11.4, have been moved to Policy H14.</p>	
<p>Economy – Policy H15</p> <p>On page 45, the HNP lays out the policies in relation to retaining and encouraging local employment. Policy H15.1 supports the redevelopment or change of use of a site, where the most recent use was employment.</p> <p>Whilst Redwood agrees that brownfield sites should be prioritised where they are suitable for development and their development will now cause wider harm in terms of loss of an existing use, it is not feasible for all of Haslemere’s housing need to be directed to brownfield, town centre sites as has been demonstrated in this representation. Encouraging the loss of employment land will also have detrimental impacts for the town and would not support the intentions of the NPPF to support sustainable economic growth.</p> <p>The HNP cannot allocate sites but can act to support the comprehensive mixed use and regeneration of sites that would then be capable of facilitating wider community and town benefits, for example through the relocation of an existing use that is not suited to a town centre location to another site in or around Haslemere.</p> <p>Subsequently, Redwood supports the principle of Policies H15.1 to H15.3. However, the HNP must recognise the importance of comprehensive redevelopment of sites where this can provide wider and greater benefits for the community and town as a whole. The following additional policy is therefore recommended to achieve this and to ensure consistency with the Development Plan, particularly LPP1 and emerging allocations and policy direction in LPP2:</p> <p>H15.4 The Town Council and Haslemere Vision will work proactively to enable sustainable regeneration of key sites including looking at and supporting the relocation of existing uses within the town that may not be suited to a town centre location, to alternative sites elsewhere in and around Haslemere. This will in turn provide potential employment and economic benefits from those sites that are regenerated.</p>	<p>Policy H15 is renumbered as H16</p> <p>Several Opportunities within the Neighbourhood Plan relate to community engagement projects to determine the use of key sites within the town in the future.</p>	

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<p>Policy H18: Encouraging an expanded visitor economy</p>		
<p>Redwood generally supports Policies H18.1 and H18.2. There are a range of opportunities at Scotland Park to achieve aims and objectives of this policy. This is particularly the case for Promotion B, where the delivery of additional housing will fund a greater community offering on the site. These are planned to include:</p> <ul style="list-style-type: none"> · new public open spaces; · land and facilities for 1st Haslemere Scout Group; · land and facilities for Grayswood Nursery and Forest School; · improved pathway access to Black Down and the SDNP and wider countryside; · new play areas; · new community potager and orchard. <p>The aims and objectives of the proposed policy can be met by positively embracing proposals such as Scotland Park. However, this support is only on the basis of all reference to “settlement boundaries” being removed from the text of policies H18.1 and 18.2.</p>	<p>The proposed new policy wording is not deemed necessary as several Opportunities in Section 5 of the Neighbourhood Plan relate to this.</p>	