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## Puttenham Neighbourhood Plan representations

Comment ID	Organisation	Comment
PNP20/1	Highways England	<p><b>Guildford Borough Council - Puttenham Neighbourhood Plan - Regulation 16 Consultation</b></p> <p>Thank you for inviting Highways England to comment on the above consultation.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3.</p> <p>We have reviewed this consultation and its supporting documentation and have no comments. However, please do continue to consult Highways England as this Neighbourhood Plan progresses.</p>
PNP20/10	Natural England	<p><b>Planning consultation:</b> Puttenham Neighbourhood Plan</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.</p>

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		<p>In our review of the Puttenham Neighbourhood Plan, we have a few comments to make which are outlined below:</p> <p><b>P-NE1 - Natural Environment</b></p> <p>- Thank you for including a requirement for a LVIA in line with the Guidelines for Landscape and Visual Impact Assessment (V3) May 2013 for development proposals outside of the Settlement Boundary. However, as mentioned before, please also include the requirement to fully consider any comments made by the AONB board.</p> <p><b>P-NE 1 - Natural Environment and P-NE 4 - Biodiversity</b></p> <p>- Please note our previous advice: The NPPF calls for the ‘promotion, conservation, restoration and enhancement of priority habitats...protection and recovery of priority species’. Within the Plan area, you are fortunate to have areas of Ancient Woodland (this is also irreplaceable habitat), Deciduous Woodland, Lowland Heath and Lowland Fens habitat. Priority and irreplaceable habitat, and priority species should be referenced within the policies, to ensure safeguarding.</p> <p>- We welcome the inclusion within the Environment Report (6. Biodiversity) of the identification of the internationally and nationally designated sites within the Neighbourhood Plan area. To align with the NPPF, we recommend including wording within the Draft Plan’s policies to safeguard these, as well as wildlife corridors and stepping stones that connect these sites, to establish ‘coherent ecological networks that are more resilient to current future pressures (NPPF, para 170(d)).</p> <p>We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 170 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain for the parish”.</p> <p><u>Further Recommendations</u></p>

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		<p>Natural England would also like to highlight as per our previous advice, that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final neighbourhood plan include:</p> <ul style="list-style-type: none"> <li>- Policies around connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure;</li> <li>- Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Natural England has recently published the Biodiversity Metric 2.0, which can be used to calculate biodiversity net gain.</li> </ul> <p>Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.</p> <p><b>Annex A - Neighbourhood planning and the natural environment: information, issues and opportunities</b></p> <p><b>Natural Environment Information Sources</b>  The <a href="#">Magic1</a> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: <b>Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)</b>. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available <a href="#">here2</a>.</p> <p><b>Priority habitats</b> are those habitats of particular importance for nature conservation, and the list of them</p>

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		<p>can be found <a href="#">here</a><sup>3</sup>. Most of these will be mapped either as <b>Sites of Special Scientific Interest</b>, on the Magic website or as <b>Local Wildlife Sites</b>. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p><b>National Character Areas</b> (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found <a href="#">here</a><sup>4</sup>.</p> <p>There may also be a local <b>landscape character assessment</b> covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a <b>National Park</b> or <b>Area of Outstanding Natural Beauty (AONB)</b>, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on <b>soil types</b> and <b>Agricultural Land Classification</b> is available (under 'landscape') on the <a href="#">Magic</a><sup>5</sup> website and also from the <a href="#">LandIS website</a><sup>6</sup>, which contains more information about obtaining soil data.</p> <p><b>Natural Environment Issues to Consider</b></p> <p><a href="#">The National Planning Policy Framework</a><sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. <a href="#">Planning Practice Guidance</a><sup>8</sup> sets out supporting guidance.</p> <p><u>Your local planning authority should be able to provide you with further advice on the potential impacts of</u></p>

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		<p><u>your plan on the natural environment and the need for any environmental assessments.</u></p> <p><u>Landscape</u>  Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><u>Wildlife habitats</u>  Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed <a href="#">here</a><sup>9</sup>), such as Sites of Special Scientific Interest or <a href="#">Ancient woodland</a><sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species and habitat</u>  You'll also want to consider whether any proposals might affect priority species (listed <a href="#">here</a><sup>11</sup>) or protected species. Natural England has produced advice <a href="#">here</a><sup>12</sup> to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found <a href="#">here</a>.</p> <p><u>Ancient woodland and veteran trees-link to standing advice</u></p>

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		<p>You should consider any impacts on ancient woodland and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland <a href="#">Inventory</a> which can help identify ancient woodland. Natural England and the Forest Commission have produced <a href="#">standing advice</a> for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances</p> <p><u>Biodiversity net gain</u> Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve and enhance biodiversity. The NPPF section 170 states “<i>Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity...</i>”. . Natural England has recently published the Biodiversity Metric 2.0 which can be used to calculate biodiversity net gain. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.</p> <p><u>Best and Most Versatile Agricultural Land</u> Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 170. For more information, see our publication <a href="#">Agricultural Land Classification: protecting the best and most versatile agricultural land</a><sup>13</sup>.</p>
PNP20/11	Natural England	<p><b>Green Infrastructure, Improving Your Natural Environment.</b></p> <p>Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.</p>

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		<p>Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:</p> <ul style="list-style-type: none"> <li>• Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces.</li> <li>• Restoring a neglected hedgerow or creating new ones.</li> <li>• Creating a new pond as an attractive feature on the site.</li> <li>• Planting trees characteristic to the local area to make a positive contribution to the local landscape.</li> <li>• Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.</li> <li>• Incorporating swift boxes or bat boxes into the design of new buildings.</li> <li>• Considering how lighting can be best managed to encourage wildlife.</li> <li>• Adding a green roof or walls to new or existing buildings.</li> </ul> <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> <li>• Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.</li> <li>• Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.</li> <li>• Identifying green areas of particular importance for special protection through Local Green Space designation (see <a href="#">Planning Practice Guidance on this</a><sup>14</sup>).</li> <li>• Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).</li> <li>• Planting additional street trees.</li> <li>• Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.</li> </ul>

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		<ul style="list-style-type: none"> <li>Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).</li> </ul> <p><u>Green Roofs</u> Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.</p> <p>We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. Please refer to <a href="http://livingroofs.org/">http://livingroofs.org/</a> for a range of innovative solutions.</p>
PNP20/12	Project Oasis North Downs	<p><b>Consultation response to `Submission Version` of Puttenham Neighbourhood Plan 2016 - 2033</b></p> <p>Whilst welcoming much that is contained within the draft Plan and recognising the considerable work of volunteers in bringing the document to this stage, we do have a limited number of relatively small proposals for change which we ask to be addressed. We particularly wish to focus on pages 27-29 about Home Farm Barns as our charity operates and manages Puttenham Eco Camping Barn, an environmental venture that we started in 2005.</p> <p>We ask for four specific changes to this section as follows...</p> <p><b>Paragraph 6.4.7:</b> Proposed additional wording to end of final sentence - "...but both parties are currently negotiating with a view to the Camping Barn continuing." In the particular context, we suggest this factual statement reflecting the current situation would be helpful.</p> <p><b>Paragraph 6.4.9:</b> In the 1<sup>st</sup> line a very minor change for absolute clarity so that it starts "The existing use of the site as a Camping Barn is acknowledged to be..."</p>

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		<p><b>Paragraph 6.4.10:</b> Deletion of the word “potentially” so that the opening wording would read “A small affordable housing development in conjunction with the retention of the existing camping barn use...”.</p> <p><b>Policy `HA1 - Home Farm Barns`:</b> Deletion of the words “(where feasible)” in the opening sentence, which would then read “The Home Farm Barns, as defined on Map HA1 below, is allocated for up to 4 affordable homes and the retention of the camping barns facility, subject to the following...”</p> <p><b>Reasons for requesting above changes:</b></p> <p>(1) As stated in paragraph 6.4.9 of the draft Neighbourhood Plan, <i>“The existing use of the site is acknowledged to be a valued asset to the village, in particular in attracting visitors to the parish.”</i> We seek, therefore, that the Neighbourhood Plan is completely clear in its wish to see the Camping Barn continue.</p> <p>(2) Our imaginative work with the Eco Camping Barn is in harmony with a number of the proposed objectives of the Neighbourhood Plan, including...</p> <p>Objective 2. <i>“To improve the health and vitality of the parish and ensure that the needs of residents and visitors are met through retaining, supporting and improving the Parish`s valued local community facilities, services and assets.”</i> We do, indeed, meet the needs of many visitors and have always sought to do this at the same time as seeking to help the village - for example, by campaigning over the past 15 years for improved bus services, albeit with only limited success.</p> <p>Objective 3. <i>“...encourage sustainable forms of transport.”</i> The vast majority of our users are walkers or cyclists.</p> <p>Objective 7. We have always ensured any work done on the Barn is in harmony with its Grade II Listed status.</p> <p>Objective 8. This reads <i>“To support the parish`s local, rural and tourism economy”</i>. In this regard, the</p>

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		<p>Camping Barn has brought significant income into the area, especially to the two public houses in the village - `The Jolly Farmer` and `The Good Intent`, as well as to other ventures such as the community shop at Shackleford.</p> <p>Our excellent relationship with `The Good Intent` led to their funding the production of a publicity leaflet about the accommodation. In January 2019 the then Landlord wrote as part of a letter: <i>“Walkers and cyclists are a significant part of our trade throughout the year, and this is certainly boosted during the open season at the Camping Barn. Often people staying at the Barn come to us for lunch on their arrival day and usually then book a table for the evening. Our menu suits visitors to the Barn as we offer traditional reasonably priced pub food... It is impossible to put a figure on what the trade is worth to the pub as we let people enjoy themselves, but Camping Barn visitors made a real contribution to the trade of `The Good Intent`.</i></p> <p>Please let us know if we can provide any further information that would be helpful, and notify us of the outcome of the Independent Examiner`s consideration.</p>
PNP20/2		<p>This plan is perfect.</p>
PNP20/3	Surrey Hills AONB	<p><b>CONSULTATION RESPONSE OF THE SURREY HILLS AONB PLANNING ADVISER ON BEHALF OF THE SURREY HILLS AONB BOARD.</b></p> <p>Puttenham Neighbourhood Plan 2016-2033 Submission Version.</p> <p>The submission of this Neighbourhood Plan is very much welcomed. The Plan is considered to be well conceived, informed and expressed for the particular circumstances of Puttenham and its surrounding area.</p>

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		<p>Potential applicants seeking planning permission would be well advised to embrace the policies and supporting text of the Plan. The Plan will be valuable in guiding the Parish Council in its response to planning applications and to the Borough Council in determining those planning applications. Where consulted by the Borough Council I shall take into account policies in the Plan.</p> <p>The Steering Group and advisers should be congratulated on preparing an excellent plan and setting a high benchmark for other Neighbourhood Plans in the Surrey Hills AONB.</p> <p>There is probably no need to repeat in this Plan national AONB planning policy at NPPF paragraph 172 and nor Guildford Local Plan Policy P1 as they adequately cover the position for the determination of planning applications. For completeness that could be stated together with reference to the Surrey Hills AONB Management Plan.</p> <p><u>P-T13 - Car Park Policy.</u> It is suggested that (a) currently reading “provision of associated soft landscaping” should read “provision of associated hedgerow and tree planting of native species to soften the visual impact of parked vehicles within the AONB”.</p> <p>The latter words after “ species” could be omitted and incorporated in the supporting text but they explain that the site is located within the visually sensitive Surrey Hills AONB outside the settlement boundary.</p> <p><u>Policy P-HP1 - Affordable housing.</u> Support is given particularly to the reference that the affordable homes, “a) will remain low-cost in perpetuity and will be secured for households with a local connection ....” and b) “it is demonstrated that there is a local affordable housing need .....”.</p> <p><u>Affordable Housing Allocations.</u></p>

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		<p>Those preparing the Plan are thanked for deleting the previous proposal for affordable housing at the then P-HA2 - Land on B3000 (Puttenham Golf Course) upon which serious AONB concern was expressed for the reasons then stated.</p> <p><u>Policies P-HA1 Home Farm Barns and P -HA2 Corner of Lees Field, Seale Lane.</u></p> <p>Both these sites are supported for affordable housing. In the previous consultation some AONB concern was expressed to P -HA2 as the corner of Lees Field is in a visually exposed location in the AONB. Following further discussions that concern was considered would be adequately mitigated if the wording along the lines of (h) in Policy P-HA2 were included in the policy and which now reads as follows.</p> <p>“ A robust landscaping and mixed native planting scheme is agreed by the LPA and planted in the first planting season following completion of the development, to mitigate against the impact on the surrounding landscape with particular regard to the the site’s AONB setting”.</p> <p>Surrey Hills AONB Management Plan 2020 - 2025 Policy P4 supports small scale affordable housing providing they do not conflict with the aim of conserving and enhancing the beauty of the landscape.</p> <p><u>Policy P - NE2 - Dark Skies.</u></p> <p>The need to avoid light pollution in the Surrey Hills AONB is becoming increasingly recognised as important. Therefore, Policy P - NE2 is supported and the reasonable way it seeks to balance related considerations.</p> <p><u>Policy P - NE3 - Trees and Hedgerows.</u></p> <p>Support is given in particular to the emphasis on replacement trees being of native species.</p> <p><u>Policy P - NE4 - Biodiversity.</u></p> <p>Support is given. Government policy towards bio-diversity and nature recovery is evolving fast and therefore the wording of the policy may need to be modified later to reflect the latest Government advice and the forthcoming Environment Act.</p>

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		<p><u>Policy P - BE1 Design.</u> Support is given to the policy which is considered to be well expressed and appropriate for the particular circumstances of the Puttenham plan area.</p>
PNP20/4	Puttenham Golf Club	<p><b>Puttenham Neighbourhood Plan</b></p> <p>We take this opportunity on behalf of Puttenham Golf Club to respond to the submitted Neighbourhood Plan. Our objective is to ensure that the land (reference P-HA2) is included in the Plan in order to fulfil the identified need for affordable housing purposes. This land is readily available and unencumbered by estates or any other consideration which would prevent its development for affordable housing purposes. This can be achieved in the short term thereby satisfying the identified need as detailed in the evidence base.</p> <p>In the absence of identifying sufficient land to meet acknowledged need the submitted Plan fails the Regulatory tests which we detail below. We set out the following:</p> <ul style="list-style-type: none"> <li>• National planning policy</li> <li>• Development plan policy</li> <li>• The draft and submitted Neighbourhood Plan</li> <li>• The identified need for affordable housing</li> <li>• The identified sites and the failure to satisfy need through land allocation</li> <li>• The planned solution</li> <li>• Summary</li> </ul> <p><b><u>National planning policy</u></b></p> <p>The Neighbourhood Plan will be informed by the development plan for Guildford Borough and must have</p>

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		<p>regard to national planning policy set out in the 2019 Framework. We refer to the following:</p> <ul style="list-style-type: none"> <li>• The need to provide land for housing purposes which can be developed to fulfil the needs of those with specific housing requirements and “without unnecessary delay” (59)</li> <li>• The determination of the minimum number of homes needed through local housing needs assessment and this must include those requiring affordable housing (60 and 61)</li> <li>• In identifying land for housing the local authority should take into account availability, deliverability and viability (67).</li> <li>• Neighbourhood planning groups should consider identifying small and medium sites suitable for housing in their area (69).</li> <li>• Local planning authorities should “support the development” of entry level and affordable housing (70).</li> <li>• In rural areas planning policies (and decisions) should be responsive to identified need and “support” such housing developments. They should “support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs” (77).</li> <li>• The provision of “limited affordable housing” to meet local needs is considered to be an exception to the principle of “inappropriate” development in the Green Belt (145).</li> </ul> <p><b><u>The development plan</u></b></p> <ul style="list-style-type: none"> <li>• The adopted Local Plan (2019) forms part of the development plan for decision making purposes.</li> <li>• Policy H1 has the objective of providing homes for all sectors of the community in accordance with the SHMA.</li> <li>• Policy H2 has the objective of ensuring that there is a supply of affordable housing to meet identified need. The Council will work with “developers, registered providers and landowners to increase the number of affordable homes in the borough to contribute to meeting identified needs”.</li> <li>• Specifically policy H3 deals with rural exception sites in the Green Belt. It is a policy of positive intent to “to meet identified local affordable housing needs”. It is acknowledged in the sub text and the SHMA that pressing need exists in the rural villages within the Borough.</li> </ul>

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		<p><b><u>The draft and submitted Neighbourhood Plan</u></b></p> <p>Puttenham Golf Club as land owners have identified the land - as shown on the attached - as being available for development for affordable housing and has engaged a preferred developer to progress this to planning application stage. In light of this and in conjunction with the local planning authority the land was allocated for affordable housing development purposes in the draft version of the Neighbourhood Plan. In so doing the allocation acknowledged that this land could satisfy need.</p> <p>This land has now been excluded from the submitted Neighbourhood Plan and thus negates the opportunity to fulfil the provision of affordable housing to meet the identified need. For the reasons set out below we are manifestly of the view that this renders the Plan unfit to serve its function in respect of affordable housing provision and is contrary to the provisions of the 2019 Framework; and the Regulatory tests.</p> <p><b><u>The identified need for affordable housing</u></b></p> <p>It is clear from the evidence base and in particular the Housing Report of 2019 that there is a pressing need for affordable housing. The broad findings of the Report are as follows:</p> <ul style="list-style-type: none"> <li>• The stated aim of the document is to assess the need for housing and affordable housing.</li> <li>• The issue of affordability which affects Puttenham and that there is a need for entry level homes for local people who cannot access the open market due to inflated house prices.</li> <li>• The Parish Council survey of 2014 “identified a clear need for homes catering for those struggling to access the housing market”.</li> <li>• “Up to date evidence suggests that the Parish has an affordable housing need of up to 16 affordable homes, with a particular need for smaller dwellings”.</li> <li>• The release of sites for market and affordable housing (subject to viability) where there are insufficient identified sites to fulfil expressed and identified need.</li> <li>• The GBC SHMA clearly identifies a need for the provision of affordable housing in the Borough and that some of this can be provided by exception sites.</li> </ul>

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		<p><b><u>The provision of identified sites to fulfil need</u></b></p> <p>The submitted Neighbourhood Plan has identified two sites for affordable housing as follows:</p> <ul style="list-style-type: none"> <li>• Home Farm Barns - a site of 0.3 hectares</li> <li>• The corner of Lees Field, Seale Lane</li> </ul> <p>There is no guide in regard to the capacity of Home Farm Barns and Lees Field is said to be for 2 houses. We also note the acknowledged constraints of the Home Farm Barns site which are, in our judgement, far from resolvable. The sub-text states:</p> <p><i>A feasibility study is required initially to determine the most desirable solution for affordable housing, taking into account the existing camping barns, the Listed nature of the building, construction and structural considerations, and financial constraints.</i></p> <p>The provision of affordable housing is entirely reliant on advantageous market conditions and the very fact that the barns are Listed would inevitably result in unknown and significantly inflated construction costs; as well as a planning constraint on the development potential for housing purposes. Indeed it is by no means certain that the barn could be converted for residential purposes having regard to the legislation and policy tests where the starting points is preservation of the heritage asset.</p> <p>Of itself these constraints render the site as wholly unsuitable for affordable housing provision. Indeed it is wholly outwith our experience for contemporary affordable housing to be provided in heritage buildings.</p> <p>In short the submitted Plan does not identify sufficient land to fulfil the acknowledged need for affordable housing within the community. In so doing the Plan fails the Regulatory tests and would, inter alia, constrain the delivery of important national planning policy objectives as well as those set out in the development plan.</p> <p><b><u>The solution</u></b></p>

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		<p>We reiterate that the identified land is readily available and advanced discussions are continuing with a developer of affordable housing who is known to the Borough Council. The site can provide housing to meet local affordable needs within 12-18 months.</p> <p>There are no estates or other development management considerations which would prevent the delivery of affordable housing on this land.</p> <p>Representations to the consultation on the draft Plan have been made in respect of the following points. The basis for excluding the site is unsound and for these reason it should be included to fulfil the identified need:</p> <ol style="list-style-type: none"> <li>1. Access to the site is unencumbered and can be engineered for this quantum of development without harm to highway safety.</li> <li>2. The site is not remote from the village and is in fact connected by reason of the surrounding development along the B3000. This is very much part of the settlement of Puttenham</li> <li>3. The site is not a Priority Habitat Woodland and this designation does not exist in any document.</li> <li>4. The site is within walking distance of the village centre and related facilities.</li> <li>5. The development of the site will support infrastructure within and around Puttenham</li> <li>6. There is more than sufficient land to encourage habitat and biodiversity enhancement</li> <li>7. The site is readily available without constraint and can accommodate affordable housing in the near future.</li> </ol> <p><b>Summary</b></p> <p>In summary, the Parish have through survey information and their Steering Group, identified a pressing need for “up to 16 affordable homes” and have made wholly inadequate provision in the submitted Plan to meet this need. On this basis the Plan should be amended to take into account the need and the immediate availability of the land which has been identified.</p> <p>We would be grateful for a continued dialogue with the Parish and Borough Councils so as to update the</p>

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		<p>respective parties on the progress which has been made to enable affordable housing on the identified land.</p>
PNP20/5		<p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.</p> <p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Guildford Borough and water undertaker for the southern part of the borough and are hence a “specific consultation body” in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:</p> <p><u>Specific Comments on Water and Wastewater/Sewerage Infrastructure</u></p> <p>Thames Water is the waste water/sewerage service provider for Puttenham. Foul Flows drain to HOCKFORD PIRBRIGHT Sewage Treatment Works, the works serve a population equivalent of circa 16500 (PE).</p> <p>Potable water services to the area are also provided by Thames Water</p> <p>Thames Water has a duty to provide maintain and extend its networks to accommodate new development with funds for network upgrades coming from infrastructure charges <a href="https://developers.thameswater.co.uk/new-connection-charging">https://developers.thameswater.co.uk/new-connection-charging</a> and funds for STW upgrades coming from it’s strategic business plan <a href="https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/our-5-year-plan-for-2020-to-2025">https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/our-5-year-plan-for-2020-to-2025</a></p> <p>The time to deliver infrastructure shouldn’t be underestimated it can take 18 months - 3 years for local upgrades 3 - 5 years for those more strategic in nature.</p> <p>Developers should be encourage to engage with TW at the earliest opportunity more information here &gt; <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p>

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		<p>The scale of any sewerage/wastewater upgrades will depend on the type, scale and location of development . Specific comments on the sites in Thames Water area are provided on the enclosed table.</p> <p><u>Paragraph 6.2.20 and Policy PT16 - Water and Wastewater Infrastructure</u> We support paragraph 6.2.20 and policy PT16 as they are in line with our previous representations.</p> <p>Reasons Why: Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and</p>

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		<p>justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.</p> <p>The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include</p>

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		<p>new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at:  <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p> <p><u>Policy PT17 – Water Efficiency</u>  We support Policy PT17 in principle, but consider that it requires amending in line with Government guidance.</p> <p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per</p>

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		<p>day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:  <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a></p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text:  <b>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</b></p> <p><u>Paragraph 6.6.13 Flood Risk</u>  We support this paragraph as it is in line with our previous representations.  Reasons why:  The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p>

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		<p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>We trust the above is satisfactory, but please do not hesitate to contact [name redacted] on the above number if you have any queries.</p>

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PNP20/6	Puttenham Golf Club	<p><b>Puttenham Neighbourhood Plan</b></p> <p>We take this opportunity to respond to the submitted Neighbourhood Plan.</p> <p>We are freehold owners of the land referenced P-HA2. Through negotiation with the Borough Council and Parish Council the land was identified and included in the draft Neighbourhood Plan so as to fulfil the identified need for affordable housing purposes.</p> <p>On this basis and to progress the delivery of affordable housing as quickly as possible we have been in advanced negotiations with a specialist developer who is known to the Borough Council. They are confident that the site can provide affordable housing and that it is available and deliverable in the short term. Indeed they have undertaken a considerable amount of work to this end.</p> <p>This land has now been excluded from the submitted Neighbourhood Plan. This is extremely disappointing as the identified need for affordable housing cannot be met on the land and buildings which have been included in the Plan.</p> <p>It is clear from the Parish Council's own studies that this need exists and it seems negligent to reject a parcel of land on which affordable housing can be delivered in the very near future. We wish to reiterate that the identified land is readily available and deliverable within the next 12-18 months. As such affordable homes would be available to those in need within the locality.</p> <p>We respond to the representations which have been made on the draft Neighbourhood Plan as follows:</p> <ol style="list-style-type: none"> <li>1. Access to the site is unencumbered and can be engineered for a small affordable housing development. Visibility is sound from this access in both directions.</li> <li>2. Contrary to some representations the site is not a Priority Habitat Woodland.</li> <li>3. The site is within walking distance of the village centre and related facilities via an existing footpath.</li> <li>4. There is more than sufficient land beyond any affordable housing development to encourage habitat and biodiversity enhancement. This can be part of the planning application process.</li> </ol>

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		<p>In summary, the Parish have identified a pressing need for “up to 16 affordable homes”. The submitted Plan does not make provision to satisfy this need. It should be amended to reinstate the land owned by Puttenham Golf Club. In this way some affordable homes will be built for the community in the very near future.</p> <p>Puttenham Golf Club would be grateful for a continued positive dialogue with the Parish and Borough Councils so as to progress affordable housing on the identified land.</p>
PNP20/7	Surrey County Council	<p>Surrey County Council Response to the Puttenham Neighbourhood Development Plan (Regulation 16)</p> <p>Thank you for consulting Surrey County Council on the Puttenham Neighbourhood Plan. We note that two minor amendments are required to two references in the document to the Surry Hills AONB Management Plan.</p> <p><u>Paragraph 5.2</u> It is noted that this the Surrey Hills AONB Management Plan is erroneously referred to as forming part of the development plan.</p> <p><u>Paragraph 6.5.3:</u> The reference to the AONB Management Plan 2014-2019 should be amended to reflect the dates of the currently adopted Plan covering 2020-2025.</p>
PNP20/8	Wanborough Parish Council	<p>Wanborough Parish Council welcomes the opportunity to comment on the Puttenham Neighbourhood Plan.</p> <p>An issue that affects both Puttenham and Wanborough is the amount of traffic using the B3000 and in particular the volume of lorries. Apart from the possibility of lowering the speed limit to 30mph - which won't do much for traffic volume - the plan appears to lack consideration for traffic reduction. It is noted that</p>

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		<p>there area a number of ideas for The Street which may or may not make a difference within the village, but no direct plans on how to lessen traffic on the B3000.</p>
PNP20/9		<p>I lived in Puttenham for 25 years from 1985 until 2010. I understand through my village connections that Puttenham Golf Club have offered a piece of redundant land on the B3000 for affordable housing but for some reason this has been left out of the Neighbourhood Plan. This, I find very strange given that the village has always needed housing for young families and to keep facilities like the school going</p> <ol style="list-style-type: none"> <li>1. The B3000 has houses, a pub/restaurant and an old telephone exchange all along it from the Hogs Back to the A3 so to build on the land would be a small infill into already populated road</li> <li>2. The piece of land offered is an abandoned golf green which has been left to overgrow and is unsightly</li> <li>3. There is already an active driveway to access the land</li> <li>4. One could walk on the footpath opposite to get to the village amenities, school, pub, village hall easily</li> <li>5. Any building could I'm sure be done sympathetically with the surroundings and certainly would not detract from the view, if anything it would improve it</li> <li>6. The B3000 is a fairly busy road with hundreds of cars a day driving down it, so half a dozen new houses will not make the slightest difference to traffic noise or congestion</li> </ol> <p>As a long standing previous inhabitant of the village, I suspect the true reasons for it being left out of the plan are probably more local politics and to do with the influence of an individual and his/her own "Not in my back yard" views rather than it being a negative asset to the village and its surroundings</p> <p>Help revitalise and strengthen the village by allowing some limited affordable housing</p>

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		Thanks for your consideration.

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