



# WEST CLANDON PARISH COUNCIL

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Dear Mr. Mead,

## WEST CLANDON NEIGHBOURHOOD PLAN EXAMINATION

Thank you for your letter dated 6 September 2011 to West Clandon Parish Council (“the Parish Council” or “we”) and Guildford Borough Council (“GBC”) raising a number of questions. Thank you also for allowing us the opportunity to comment on these points. Our answers are set out below, using the same numbering as your questions.

### 1. Regulation 14 Consultation

The consultation period began on 1 February 2020.

### 2. Policy 4. The Green Gap

In relation to the Green Gap we hope we are correct in assuming your proposal is to delete only paragraph (i) of Policy 4 and replace it with your suggested wording (and to treat the other paragraphs of paragraph 4 on their merits) rather than to reduce Policy 4 to the single paragraph you suggest.

The preservation of the undeveloped green belt separation between West Clandon and surrounding settlements is key to preserving the distinct and rural character of the village and was a key concern raised by residents as the draft plan was developed. We believe resistance against coalescence of settlements is a legitimate objective of land use policy and believe the coalescence of West Clandon with neighbouring settlements would not represent sustainable development. Accordingly, we are pleased that your proposed alternative wording recognises this specific concern of residents to avoid erosion of the separation between settlements.

In relation to the precise wording we would respectfully suggest it could be helpful to clarify that the policy refers to developments which would “individually or cumulatively (since the date of adoption of the Plan)” erode the separation. In addition, we do have a concern that the suggested reference to “significant” erosion would allow arguments that erosion of less than a certain percentage (say 20%, or some such figure) would not be “significant”, thus leading (particularly if successive developments were allowed) to West Clandon gradually being joined up to surrounding settlements. Accordingly, we would respectfully suggest that the word “significant” be replaced by some expression implying a lesser degree of erosion. For example, by referring to erosion than was more than minimal.

If you do determine that the references to the Green Gap should be deleted we still believe that the text surrounding Policy 4 (numbered 7.1 to 7.15) (suitably edited) remains relevant and supportable and should be retained. Map 4: The Green Gap would need to be deleted.

We also believe that policies 4(ii) to 4(v) are of significant importance and should be considered on their merits (with textual amendment if required to conform to national policy or to avoid uncertainty). We comment on this further below where we respond to points raised by GBC in their statement.

### 3. Policy 8. Parking standards

We agree with GBC's proposal in their answer to this question.

### 4. Other Policies

You asked for the Parish Council's comments on the point raised on the GBC statement for the examiner on Policies 1, 2, 3, 4 (other than the Green Gap), 6 and 8 (other than parking standards.) Our comments are as follows:

#### **Policy 1: Design within West Clandon Village (Settlement and Conservation Areas)**

**GBC statement paragraph 4.4 on Policy 1 criteria (xiv).** The policy intention is to protect the characters of the different identified character areas of the village. For various character areas the increased activity, hard standing, parked cars and domestic paraphernalia resulting from plot or property subdivision for smaller units would alter the character of those areas.

GBC points out that LPSS Policy H1 (1) requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment. However, the character areas refer to areas which are already developed. There is no scope or need in these areas for substantial developments which would support a mix of houses as envisaged in the LPSS in each of these areas taken individually. Given the nature of the village, development in these areas is likely to take the form of replacement of existing buildings or limited infilling of one or two new houses. The substantial Gosden Hill development within the Plan area will be able to support a full mix of dwellings. Accordingly, we believe this criteria can be supported.

If it is the case that there is a technical difficulty with some of the character descriptions referring to minimum numbers of bedroom rather than what is typical perhaps it can be dealt with **by stating that the minimum number of bedrooms referred to in character assessments is to be read for this purpose as a reference to what is typical in the area.** The underlined words below could be added to the text:

*xi) The division of or replacement of larger properties into smaller units or apartments will only be supported where these are in line with the development criteria specified in the Character Assessment (Appendix 1 and Section 6, above) (save that for the purposes of this sub-paragraph (xiv) any references to a "minimum number" of bedrooms shall be read as though it referred to a "typical number" of bedrooms)*

GBC statement paragraph 4.6 Policy 1 criteria (xvi). The policy intent is to preserve the existing character of the Conservation Area and to emphasise the high bar that would need to be overcome to justify new development. We accept that rewording to ensure consistency with the NPPF is needed.

GBC statement paragraphs 4.7 and 4.8 Policy 1 criteria (xvii) and (xviii). These criteria state that new or replacement development should reference and reflect prevailing housing densities and be a maximum two stories with large gardens based on existing plot sizes. Again, the policy intent is to protect the character of the area which would be damaged by inappropriate changes to housing density. West Clandon is a semi-rural linear village set within the Green belt. It has no concentrated densely developed village centre and is characterised by its largely open and leafy character. Taller houses or smaller plots would undoubtedly prejudice its openness.

If conflict with national policy is perceived this might be dealt with by changing criterion (xvii) to refer to new developments having to “referencing and have regard to” prevailing housing densities and changing criterion (xviii) to “large gardens which reflect the character of the area”

### **Policy 2: The Strategic Site at Gosden Hill Farm**

We agree with GBC’s helpful suggested amendments set out in paragraph 4.10 and 4.11 of the GBC **statement** which better express the intention of the original drafting.

### **Policy 3: Developments in Other Areas of the Parish**

**GBC letter paragraph 4.13** Policy 3 criteria (xi). We would make the same comments as are made above in relation to **GBC letter paragraph 4.4 on** Policy 1 criteria (xiv). And for the same reasons believe we this criteria can be supported.

### **Policy 4 [Green Gap], Valued Landscape and Views (other than Green Gap)**

**GBC letter paragraph 4.15** Policy 4 criteria (ii). In light of GBC’s comment we suggest that criteria (ii) be amended by deleting the words “and may only be supported in very special circumstances”

**GBC letter paragraph 4.16** Policy 4 criteria (v). We note that GBC does not object in principle to a policy designed to protect the views identified in the Plan. Its concerns are that a policy worded too broadly could impact development at site allocation A25 at Gosden Hill and that the policy should be sufficiently clear. We suggest this criteria could be amended to address GBC’s concerns. The drafting can exclude from the policy on protected views development within the allocated site at Gosden Hill. In addition, as stated by GBC there could be clarification of what constituted unacceptable impact on the identified views. For example the criteria could state:

“Save for development on site allocation A25 at Gosden Hill, development proposals that have a material adverse impact on the open character of the protected views will not be supported.”

### **Policy 6: Biodiversity and Environment**

We agree with GBC’s helpful suggested amendments set out in paragraph 4.19 of the GBC statement.

### **Policy 8: Parking**

We agree with GBC’s helpful comments on the difficulty of assessing the needs of the household and suggest referring to the characteristics of the development.

5. National Planning Policy Framework July 2021

We are not aware of any changes needed as a result of the publication of the revised NPPF or the final version of the National Model Design Code.

Yours sincerely,

Paul Edwards

Parish Clerk

For West Clandon Parish Council