

Godalming and Farncombe Neighbourhood Plan 2017-2032

Initial Comments of the Independent Examiner

Prepared by

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Introduction

- 1) As you will be aware, I have been appointed to carry out the examination of the Godalming and Farncombe Neighbourhood Plan. I have carried out my initial review of the Plan and the accompanying documents that I have been sent. I visited Godalming and Farncombe to re-familiarise myself with the plan area on 4th January 2019.
- 2) My initial view is that I should be able to deal with the examination of this Plan by the consideration of the written material only, although I do still have to reserve the right to call for a public hearing, if I consider that it will assist my examination.
- 3) However, there are a number of matters that I would seek clarification or further views of both the Neighbourhood Plan Group and Waverley District Council.

Regulation 16 Consultation Responses

- 4) I would offer the Qualifying Body the opportunity to put forward any comments it wishes me to consider, in response to the comments made by the Regulation 16 consultees and whether it wishes to put forward any possible changes to the drafting of the plan that it would wish me to consider making, to respond to the comments made.

Mapping Issues

- 5) I have concerns that the Policies Map shown on Page 73 is too small a scale so as to be capable for property owners to understand whether their property is covered by a particular designation. The plan on Page 74 is very readable. Would it be possible for the Policies Map to be enlarged, even if it meant splitting the plan area on to different pages? For my examination, I would be pleased if I could be sent an enlarged Policies Map, possibly at A3 size

Policy GOD1

- 6) Table 4.1 refers to the need for one bed units to be provided within the housing mix, particularly for affordable housing schemes. Could the Qualifying Body explain why the housing mix policy does not require the delivery of one bed units, especially in view of the plan recognising the needs of elderly residents? Should the wording of the policy reflect the need for the percentages to change in the future, to reflect changing needs, through the lifetime of the plan? This may be especially the case in terms of affordable housing, reflecting the needs of persons on the housing register at any one time.
- 7) Could the District Council comment on the fact that the NP is proposing a housing mix to meet its housing area, which appears to be in line with Government advice; and in particular, whether the difference between the Council's Local Plan mix, which provide for the plan area to contribute to meeting the needs of the wider district, and the neighbourhood plan mix that responds to the plan area's needs, is likely to be significant in practice.

Policy GOD 2

- 8) What is the Qualifying Body's views on whether the wording of the policy should allow, not just the conversion of buildings, but also the construction of well-designed new building, as Local Plan Policy EE1 allows, so long as they are replacement buildings, as allowed by national Green Belt policy, in para 89 of the NPPF (2012).

Policy GOD 12

- 9) Can the Qualifying Body clarify whether the Green Corridor shown in Figure 8.1, relates to the areas shown shaded in green or are they the areas shown by the green arrow and is the position of the green arrows sufficiently precise in terms of their extent to allow a decision maker know whether Policy GOD12 applies to that site or whether it should be a more precise boundary. I would also welcome the LPA's view on whether that proposed corridors are capable of being used in a development management context

Policy GOD15

- 10) I note in paragraph 8.26 that this policy has been informed by "all relevant national policies and expert opinion used to inform another emerging Neighbourhood plan". Can I be provided with a copy of that evidence and can it be confirmed what neighbourhood plan the evidence relates to and whether that neighbourhood plan has been through examination.
- 11) Can the District Council provide me with a plan that shows the existing AQMA and also other areas where air quality is a concern? I would also welcome a comment from the Plan Group as to whether the policy relating to air quality should be restricted to areas whether there is an existing air quality issue.
- 12) Can the Qualifying Body point me to the specific EU or UK environmental requirements in relation to air pollutants, that a planning officer will be expected to assess a planning application against and should there be a minimum threshold as to what developments should be considered against this policy?
- 13) Can the LPA advise me whether it has any relevant development plan policies that deal with the issue of air quality?
- 14) Is there a conflict between the threshold set out in GOD 15 E for electric charging points and that set out in Policy GOD 11? What level of provision would be expected in a housing development over 50 units - is it a difference between schemes that are communal in nature e.g. apartment development and those properties which have curtilage parking?

Policy GOD 17

- 15) Could the areas identified in GOD 17 A be shown on a map, so there is no uncertainty as to which areas are required to consider the issue of LEAP or MUGA provision?

Concluding Remarks

- 16) I invite responses and the additional information to the above matters to be submitted to me by email, by **5pm on 6th February 2019**. I do not mind if this comes as a coordinated or separate responses from the Qualifying Body and the District Council.
- 17) I would also ask that a copy of this document along with the responses are placed on the appropriate web sites in the interest of transparency and openness.

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Independent Examiner to the Godalming and Farncombe Neighbourhood Plan.

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