

Windlesham Neighbourhood Development Plan 2018-2028

This document provides a tabulation of the representations to the pre-examination version of the Windlesham Neighbourhood Plan 2018-2028 (Regulation 16). This version of the Plan was published on 6th April 2018.

Respondent	Comment
Andy Wells	<p>I am writing regarding the public consultation of the Windlesham Neighbourhood Plan. Our client owns a significant area of land between Bagshot and Windlesham, some of which is situated within the Neighbourhood Plan area. An area of land (comprising approx. 15ha.) north and east of the Swift Lane recycling centre and travellers site, bounded by New Road to the north and a tributary of Windle Brook to the east, is proposed as a Suitable Area of Natural Greenspace (SANG).</p> <p>The site is currently in use as the Balfour Beatty compound for the M3 Smart Motorway project. It is noted that the site lies in a gap between the buffer zones of existing SANG and would therefore meet the need for a SANG in the Bagshot/ Windlesham area.</p> <p>As the site lies within the Green Belt it would provide an opportunity for public access, as advised by paragraph 81 of the NPPF (specifically encouraged in the Neighbourhood Plan).</p> <p>The site has been submitted to Surrey Heath through their call for sites and accepted in principle, subject to agreement with Natural England. Earlier this year, the landowner met with Natural England and took them round the site. Natural England provided their detailed advice on the proposed SANG, which was positive and concluded with the following:</p> <p>‘In terms of a planning application we would be looking for a full SANG Management Plan to be submitted which should address the following areas:</p> <ul style="list-style-type: none"> • Quantity and quality (in terms of the NE Guidelines, including habitat management etc.) of SANG being brought forward; • Information on the costs and proposed funding mechanisms for the SANG capital works and in perpetuity management (minimum of 80 years); • Information on who will be responsible for the capital works and proposed long term management of the SANGs for in perpetuity with written agreement from the proposed management body and step-in-rights if necessary; and • Information on the phasing of the SANG development.’ <p>(Natural England, 22nd March 2018)</p> <p>It is not currently proposed to phase the SANG development. All of the other matters identified above will be set out in a full SANG Management Plan. The landowner intends to seek planning permission for the land to be used as SANG later this year. Accordingly, the Neighbourhood Plan should be updated to make reference to the proposed SANG and the opportunity it provides for public access and recreation.</p> <p>I trust the above is helpful and please do not hesitate to contact me if you require any further information.</p>
David Howie	<p style="text-align: center;">REPRESENTATION FROM MR DAVID HOWIE ON THE WINDLESHAM NEIGHBOURHOOD PLAN (2018-2028)</p> <p style="text-align: center;">In general, I am supportive of the need for a neighbourhood plan for Windlesham provided it has</p>

been genuinely community led (see my general comments towards the end) and robust enough to achieve its objectives (see my comments on the numbered policies). My main concern is with the process involved in producing this WNP as evidenced by the tokenism of much responses to feedback and the failure to keep the community informed of developments except at the few “take it or leave it” public events in 2016. I do not think that it is a true representation of the community even though it will probably be supported in a referendum.

I have detailed knowledge of the development of the WNP in its early stages as I was Secretary of the Windlesham Neighbourhood Plan Steering Group (WNPSG) from its inception in March 2014 until my resignation in February 2015. During this time I was responsible for keeping the community informed of progress via the Website, monthly Newsletter and ensuring that articles were regularly published in the monthly Parish Magazine. I was also instrumental in the production of the 2014 Survey. I have continued to take a keen interest in the progress of the Plan since then and provided detailed comment to the Parish on their consultation on the draft WNP in 2017.

Please find below my comments on the detail in the Windlesham Neighbourhood Plan (WNP). They follow the same sequence as the WNP document.

A Neighbourhood Plan – Defined

In the Parish Consultation of 2017 on the draft WNP, I pointed out that the area covered by the WNP is Windlesham Ward. This obviously included Windlesham village but reference to the village in the WNP did not include the wider area of the Ward. The Consultation document indicated that this had been accepted and the wording changed. However, it was only changed in the second paragraph and not the first which still describes the area of the WNP as “Windlesham village”. This needs to be amended.

How the Plan was prepared

“In the autumn of 2014 residents were asked to complete a survey and comment on the information gathered from the village fete and launch event.” In my response to the 2017 Parish consultation on the draft WNP, I pointed out that this was inaccurate. The Launch event in the village hall was held on 27 September 2014. It included the launch of the 2014 Survey questionnaire which was distributed to those who attended and circulated in a newsletter and made available on the website. It is therefore incorrect to continue to suggest that the views of the residents were collected at the Launch event and the 2014 survey was based on these views. It gives the wrong impression by suggesting that the 2014 survey was based

on the views of the community. I was instrumental in the drafting of the 2014 survey in August 2014 to identify the main issues for the Neighbourhood Plan to address and can confirm that it was based on the views collected from the display at the Windlesham Fete (ie a small section of the community who attended) and on the initial survey conducted for the Ascot, Sunninghill & Sunningdale Neighbourhood Plan - suitably adapted for the circumstances in Windlesham. The response in the Consultation document indicates that "the sequence will be included in the Consultation Statement". However, no change has been made to the main WNP and the statement above is still incorrect in the WNP document. **This is just one illustration from the consultation process conducted at Parish level where a decision was taken to make an amendment in response to the comment but nothing has actually changed in the wording of the WNP. This illustrates the tokenism of the consultation process at parish level.**

"A detailed analysis of the responses to this survey was carried out by the Working Group and the survey data used to identify the main issues facing the village." However, no detailed "so what" analysis of the 2014 was actually carried out before the 2015 survey. The 2014 Survey "closed" at the beginning of October 2014 and the responses passed to the Working Group for detailed analysis. I ensured that feedback on selected aspects of the Survey of general interest were publicised in the monthly Parish Magazine to provide feedback to the community on their responses. To make it easier for the members of the Working Group to analyse the results and identify the issues for the Steering Group to approve at its December meeting, I produced a "cut & paste" summary of all the comments received in the Survey and also included all the comments posted at the Fete in June 2014 and at the Launch Event in September 2014. To make it even easier to analyse these comments, I had grouped them under each of the proposed Aims (now termed Objectives) of the Neighbourhood Plan. I also organised a workshop for members of the Working Group to help them identify a relevant issue during their analysis of the comments. It was the failure of the Working Group to conduct a detailed objective analysis and identify the main issues that led directly, at the December 2014 meeting of the WNPSG, to me announcing my resignation wef 8 March 2015. (The three months' notice was to give the Steering Group time to find a successor for all my various roles). At the January 2015 Steering Group meeting, I pointed out that the "Work in Progress" paper, produced by the Working Group at the end of December 2014, and claiming to be an analysis of the 2014 Survey, was based on a subjective analysis of the results of the Survey. The "Issues" identified in this "Work in Progress" document had not been supported by any detailed "so what" analysis of the raw statistics provided by Survey Monkey or of the comments made in the responses to the questionnaire. Indeed, the Working Group in its "Work in Progress" document was already identifying possible Options before any agreement on the basic Issues had been approved by the Steering Group and was already mapping out the format of the final Plan without any approval from the Steering Group. Despite assurances that a detailed analysis of the 2014 Survey would be conducted before the March

2015 Steering Group meeting, no results of any detailed "so what" analysis of the responses to the questions and of the comments provided in the 2014 Survey were made public. On 23 December 2015, a summary of the statistical responses to each question based on the standard analysis by Survey Monkey was finally posted on the website. However, no comment was made about the effects of this analysis on the way forward for the Neighbourhood Plan and no analysis of the comments made in the Survey was included. Furthermore, no attempt was made to notify supporters in the community via Twitter or a newsletter that this "analysis" was available to view. The community, therefore, has been unable to see how the results of their responses have been interpreted and how they have affected the process. Since my departure from the WNPSG, this failure to communicate with the local community except at specific events has been a feature of the development of the WNP.

"The information collected was researched and then tested in a second survey launched at the annual village fete June 2015." In my response to the 2017 consultation, I pointed out that this was misleading. The analysis of the responses to the 2014 survey by the Working Group was supposed to be presented to the meeting of the Steering Group in December 2014 but this failed to happen. A subjective summary of the responses was presented to the Steering Group in March 2015 and approved but the detailed statistical analysis of the responses to the questions and of the open ended comments in the 2014 survey was not presented to, and approved by, the Steering Group until February 2016 - well after the second survey had been conducted. **This represents a failure in the process of developing a neighbourhood plan whereby each stage should be based on a detailed analysis of the previous stage.** Further, many of the issues identified in the "Work in Progress" document produced at the end of December 2014 were a subjective interpretation of a few unsolicited comments in the responses to the 2014 Survey. It was therefore disappointing that no opportunity was taken in the 2015 Survey to assess the degree of support for these comments with a specific question on the "Issue" for all to answer before they were asked about any proposals to deal with the "Issue" that had been suggested in unsolicited comments from the 2014 Survey. For example, there were several unsolicited comments in the open ended responses to questions in the 2014 Survey that referred to the fact that the village centre was an eyesore and parking was a problem. Instead of testing the degree of support for these "Issues", which were based on the comments of only a few respondents to the 2014 Survey, the 2015 questionnaire assumed that there was an Issue supported by the whole community and tried to gain support for the solution that the Working Group had come up with without any real attempt to justify the proposed solution or test support for other solutions that had been suggested by those who had commented in the 2014 Survey. A summary of the statistical responses to each question based on the standard analysis by Survey Monkey was circulated on 23 December 2015 to 372 supporters of the Neighbourhood Plan with an email address. Although this was merely a repeat of the statistical results already on the website, it was

at least an active means of communication. However, no comment was provided on how these results would affect the development of the Neighbourhood Plan and no summary of the 100+ open ended comments on each question, was provided.

The Consultation Statement indicated that the sequence described in my comments would be included in the consultation statement and a revised statement included in the Consultation Statement but the WNP has not been amended. **This is an example of the tokenism of the consultation process despite the comments of the WNPSG in the Consultation Statement that “due process has been followed at every stage and has been reviewed and accepted by Locality.”**

VISION

According to the advice given by Locality in documents presented to the WNPSG in 2014, a Vision Statement is meant to set out how the area should be at the end of the Neighbourhood Plan period (ie in 2028). The Objectives of the Plan would then be based on achieving this Vision and the policies in the Plan would be designed to achieve the Objectives.

In my response to the Parish consultation in 2017, I commented that none of the policies listed in the draft WNP would lead to Windlesham being “one of the most outstanding villages in the UK” by the end of 2028. Nor would the policies listed offer “an unparalleled opportunity to be part of a community that provides a friendly and safe environment” as they only cover housing and parking. The numbered policies in the WNP will help towards meeting the needs of the community through well designed development but they will have no influence on public spaces or on being able to retain and manage Windlesham’s historic and natural assets. These latter are furthered in the Surrey Heath Local Plan but there are no policies in the draft WNP that would add value to what is already in the Surrey Heath Local Plan in this respect. The response in the Consultation Statement dismisses these concerns and indicates that “the Village Rejuvenation Project (VRP) is part of the Vision as are the objectives which are clearly set out in the Project”. The Foreword to the WNP is also misleading in this context as it states that “the Plan sets objectives on key themes such as housing, travelling around, green space, and employment. All the policies contained within the Plan are designed to achieve this vision for Windlesham”. As the policies within the WNP only cover housing and parking this is clearly incorrect. The VRP is included within the WNP document at Appendix 8 but, as the Foreword makes clear, it is not part of the policies of the WNP and neither are the Additional Issues included at Appendix 9. As they are not policies of the WNP, they cannot be seen to be achieving the Vision – even though the view taken in the Consultation Statement in

response to my comments is that they do.

In my response to the 2017 consultation I commented that the advice from Locality in 2014 had also made it clear that once the Vision and Objectives had been developed, they should be publicised and subjected to further consultation. The original Vision Statement agreed by the WNPSG in June 2014 was “To maintain Windlesham’s rural character whilst responding to the needs of local people”. It reflected the views of the members of the Steering Group at that time. This was posted on the website in the summer of 2014. Despite the website stating that the Vision Statement and Aims of the Neighbourhood Plan would be put to the community for approval in the 2015 questionnaire, this did not happen. They remained just the product of the Steering Group. Until they receive the support of the community that the Steering Group purports to represent, they are just draft proposals. It was also understood at the time of my departure in Feb 2015 that, once these had been agreed with the community, a further survey in the summer of 2015 would assess support for the various options for achieving the objectives identified from an analysis of the 2014 survey. However, the single consultation that did take place in summer 2015 did not test opinion on either the Vision Statement or the Objectives, as amended by the WNPSG in March 2015, and these have still not been tested formally through a questionnaire widely distributed to all members of the community although they were made public at the display open to residents on 29th Sep 2016. The Vision Statement, therefore, cannot be said to represent the aspirations of the community as a whole and, as the policies in the draft WNP do not help towards meeting the Vision Statement, the rationale for such a sweeping Vision Statement should be questioned. In 2017, I suggested that an amended Vision Statement based on reflecting the situation of Windlesham after the achievement of the policies in the Plan should be adopted for the final WNP that goes forward. It should be realistic within the given timescale and represent the views of the community as obtained through public consultation and questionnaire. A suggested realistic Vision based on the policies within the draft WNP would be: “To meet the needs of the community through well designed development.” Everything else is hyperbole. The Consultation Statement dismisses these concerns that the Vision is the product of a small clique and not approved by the community by stating that “the background to the whole document will be set out in the Consultation Statement” and that “the VRP is set to achieve the aspirations set out in the Vision”. **As mentioned above the VRP is not formally part of the WNP and therefore the Vision should only be based on what can be achieved by 2028 through the policies included in the WNP. This is another example of the tokenism of the 2017 consultation as no change was actually made to the WNP and any changes would be in the Consultation Statement – not the Plan.**

OBJECTIVES

As I commented in my response to the 2017 consultation, the Objectives of the draft WNP should be based on achieving the Vision for Windlesham within the time frame of the Plan (ie by 2028). The numbered policies listed in the draft WNP only meet two of the Objectives listed for the WNP. These are to “Meet new housing demand in a way that is sympathetic to the area, ensure that the right type of housing is built in the right locations, and that a mix of housing types is delivered, to include family homes that are affordable to a wide selection of the population” and to “Seek ways of addressing the problem of traffic congestion on our roads and lack of parking through the provision of adequate residential onsite parking facilities”. Policies WNP1 to 3 cover the former and policy WNP4 the latter. This seems to indicate that all the WNP is seeking to achieve is some control over housing and residential parking. These four policies, though desirable, are not going to achieve the Vision for Windlesham by 2028 nor will they achieve most of the Objectives listed in the WNP. The Objectives listed covering Village Centre and facilities, Green Spaces, Employment and Traffic are not covered by any of the numbered policies in the WNP. The topics are mentioned in the description of the Present Situation in the introductory chapters of the draft WNP but, as no formal policies are included to deal with them and no recommendations made in relation to topics that a neighbourhood plan cannot make policy on, the Objectives in relation to those topics not covered by a policy are meaningless in the achievement of the Vision. The response in the Consultation Statement to these concerns was merely to indicate that the objectives were met in the VRP at Appendix 8 and the Additional Issues at Appendix 9 - even though, as described above, neither of these Appendices are formally part of the WNP.

As with the Vision Statement, instead of the Objectives reflecting the tested views of the community and the policies then being developed to meet them, the current Vision Statement and Objectives were agreed by the WNPSG in March 2015 and policies were subsequently developed to achieve them before the community was first made aware of them at the display in September 2016. **This is an example of the flawed process in the development the WNP whereby the policies to deal with the issues were developed before the issues had been properly analysed and assessed and before the Vision and Objectives had been agreed by the community.**

POLICIES

The flawed process was also evident in the consultation that took place in summer 2015 which not only failed to test public opinion on either the Vision Statement or the Objectives but was undertaken

before any detailed “so what” analysis of the 2014 survey had taken place and the results approved by the WNPSG. This analysis was not presented to the WNPSG until its meeting in February 2016. The 2015 consultation also failed to test the weight of opinion in support of unsolicited open-ended comments made in the responses to the 2014 survey before asking for opinions on the subjective solutions devised by the WNPSG and its Working Group. The Consultation Statement responded to these concerns by merely stating “See Consultation Statement relating to the whole process”. **This is another example of there being a superficial response to the consultation which suggests that the view has been taken into account when nothing has changed.**

In September 2016, the WNPSG finally published its draft policies based on an amended Vision Statement and revised Objectives which had not been approved by the community it is meant to be representing the views of. Instead of the policies being based on community support for the Vision and Objectives of the WNP, the policies were developed based solely on the WNPSG’s view of what the Vision and Objectives should be. Instead of the process being led by the community who should have been consulted on the Vision and Objectives and give their approval before moving to the next stage of developing the policies to achieve them, the September 2016 display became effectively a “take it or leave it” consultation on both the Vision, Objectives and the Policies to achieve them. This was too late for the community to have any meaningful influence on the process. **This is another example of the “tokenism” of the 2017 consultation. This tokenism was further illustrated by the response to these comments which stated “Attention will be drawn to the two analyses will be included in the Consultation Statement”.**

The draft policies in 2016 claimed to reflect the responses to the 2014 and 2015 surveys and therefore to reflect the wishes of the community. However, as previously mentioned, the 2015 survey was conducted before any detailed “so what” analysis of the results of the 2014 survey had been conducted, approved by the WNPSG and made public on the website. The basic statistical analyses of the results of both surveys were only published on the website in December 2015 and an analysis of the comments made in the 2014 survey was belatedly published in March 2016. However, a detailed analysis is not just about counting the number of responses to the questions and the number making a comment on any particular topic but needs to take into account the depth and range of responses, including the open-ended comments, and identifying the significance of all these responses for the development of policies for inclusion in the Neighbourhood Plan. There is no evidence that this has been done and a detailed analysis of the comments in the 2015 survey has still not been published. As mentioned in the advice from Locality,

a common mistake of those developing Neighbourhood Plans is to produce options before the community has been consulted (eg the WVP) or before the results of the consultations have been objectively analysed to ensure that the options genuinely reflect the wishes of the community. **The 2015 survey can be seen as another example of “tokenism” where the WNPSG had already decided on the best option, particularly in relation to the WVP before the consultation was conducted and merely sought endorsement of its decisions without giving the community the opportunity to choose between various options suggested in the open-ended comments in the 2014 survey.** These concerns are blandly dismissed with the claim that “*due process has been followed at every stage and has been reviewed and accepted by Locality*” and that “*This will be covered in detail in the Consultation Statement*”. These responses effectively ignored the concerns raised which again illustrates the theme of a response appearing to be made but nothing has changed.

New Development Standards

Policy No WNP1.4. Design and Access Statement.

In the 2017 consultation, I pointed out that the wording was weak as it stated that the developer “should” submit such a statement and this was amended in the final version so that the developer is now “required” to submit a Design and Access Statement for all new development of 10 or more dwellings. However this is no different from the national situation because from 25 June 2013, design and access statements have been required for buildings of more than 1,000 sqm, housing developments of 10 dwellings or more and developments requiring listed building consent. In addition, in conservation areas design and access statements are required for single dwellings or buildings of more than 100 sqm. This policy is therefore weaker than the rules nationally as it does not cover the stricter requirements for listed buildings or the Conservation Areas within the area. In addition, if this policy is to have any significance in the WNP area, it needs to be more restrictive than what is already required nationally so that smaller developments of, for example, 5 or more dwellings are included. **As it is, there is no need for this policy in the WNP as the restrictions nationally are more comprehensive.**

Policy No WNP1.5 – Statement of Community Consultation.

In the 2017 consultation, I pointed out that the wording was weak as the developer “should” send such a statement with the planning application – but is not required to do so. Also, developers were only “actively encouraged” to take part in such consultation through constructive dialogue with the Parish Council and the Community. I pointed out that none of this wording made a firm requirement for a

developer to comply with this policy. As such the policy would be ineffective unless it is worded in a way that makes it more binding on a developer. The response in the Consultation Statement indicated that: “This policy has been amended” – when it clearly has not. **This is yet another example of the tokenism of the 2017 consultation, when a placatory comment is made in response but nothing in the wording of the policy has actually been changed.** Given that my suggestion for WNP1.4 was accepted, it is strange that it was not accepted for WNP1.5. *Nb. If the size of the development covered by WNP1.4 is reduced from 10 to 5 as suggested above, the size of the development affected by this policy should reflect this.*

DESIGN STANDARDS

Policy No WNP3.2 – Design Boundaries. In the 2017 consultation, I commented that although a laudable policy, there is no justification for it provided in the Background paragraph which has no mention of boundary demarcation. This should be rectified. The comment was ignored with the response in the Consultation Statement merely stating that “Background states that domestic garden space is very important”. This should be rectified and a justification for the policy provided in the Background statement.

APPENDIX 2 – SPORT FACILITIES

As the formal WNP has no policies that relate to Sport Facilities, this appendix is superfluous. As an explanation of the background to the development of the draft WNP, it could be included in the Community Facilities section as an explanation of what was considered and rejected as the current section covering Sports Facilities is very inadequate. This comment was ignored in the Consultation Statement.

APPENDIX 3 – CYCLEWAYS

As the WNP has no policies that relate to Cycleways, this appendix is also superfluous. As an explanation of the background to the development of the draft WNP, it could be included in the Cycleways section as an explanation of what was considered and rejected as the current section covering Cycleways is very brief. The Consultation Statement merely responded with “See recommendations” ie referring to Appendix 9 which is not part of the WNP even though included within the document entitled WNP.

APPENDIX 5 – DATA ANALYSIS FROM SURVEYS CONDUCTED AS PART OF WNP CONSULTATIONS

Sections 3 and 4 relate to Traffic Issues that are not covered by policies in the WNP except for Policy

WNP4 which only covers parking provision in new residential developments.

Section 5 has no relevance to any of the policies in the draft WNP so is superfluous. There is not even a section dealing with this topic in the general introductory sections of the draft WNP.

Section 6 also has no relevance to any of the policies in the draft WNP so is superfluous. There is not even a section dealing with this topic in the general introductory sections of the draft WNP.

APPENDIX 8 WINDLESHAM VILLAGE PROJECT (VRP)

The following comments made in the 2017 consultation were ignored in the Consultation Statement. The only justifiable reason for this would be because the WVP was outside the WNP even though included within the document. I had commented that, as explained in the Locality Neighbourhood Plan Roadmap Guide, a Neighbourhood Plan can include proposals for regeneration or enhancement relating to the use or development of land in the neighbourhood area. These proposals would need to be evidence based and meet the basic conditions that are applicable to all neighbourhood plans (ie have regard to national policy, contribute to sustainable growth, in conformity with strategic policies in the Surrey Heath Local Plan, compatible with human rights requirements and compatible with EU obligations). Also, consideration must be given to how these proposals are to be funded and delivered within the lifetime of the neighbourhood plan (ie by 2028 for this project).

Such projects are outside of the policies within the Plan which become part of the Statutory Local Strategic Development Plan. As such a vote for the numbered policies in the WNP at referendum should not be considered as a vote for the WVP. Even though the section on the VRP on page 43 makes it clear that it is entirely separate from the WNP and merely included to address issues that were raised during the consultation process, the existence of this project within the draft WNP is confusing as many in the local community associate the WNP as being the same as the VRP and there is a lot of rumour and suspicion associated with it concerning what it will involve, how much it will cost and whether the local council tax payers will be required to fund it in part or in whole through a precept on the rates.

This confusion is exacerbated as the section on the VRP on page 43 is laid out in the same way as the planning policies within the WNP with Objectives, Background and Policies. This is likely to cause confusion even though the policies to help achieve the Objectives of the VRP are not actually numbered.

The information on page 43 concerning the VRP does not provide any details on how the project

will achieve its objectives by 2028 (ie within the timescale of the WNP) and offers no details on how much the project will cost or how these costs will be met by 2028. Details of the project are provided on the Parish Council Website but no costings are provided and no indication of how the WVP will be funded is given. Details of how the VRP will meet the objectives ascribed to it should be included in the WNP if it is believed that it can be delivered by 2028. Unless these details are provided Appendix 8 should be removed.

The project was the brainchild of one member of the WNPSG. He presented his proposals to the WNPSG in December 2014. This was before any detailed “so what” analysis of the results of the 2014 survey had been produced and approved by the WNPSG. As previously mentioned, a detailed analysis of the consultation in 2014 to identify the issues for the WNP to focus on should have been produced in time for the December 2014 meeting of the WNPSG but this did not happen. In fact a detailed analysis of the responses to the 2014 survey and the open-ended comments was not produced until late in 2015. The VRP therefore arose from a subjective analysis by one person of the feedback from the three consultation events held in 2014 before the WNPSG had approved any analysis of the results of the consultations. Many of the responses from these consultations were in unsolicited open ended comments (including some derogatory comments concerning the village centre shops and parking) which would have needed to be tested on the community in a further questionnaire in 2015 to assess the degree of support for the opinions given. By then, however, the VRP had become the main focus of the WNP Working Group and, instead of assessing the strength of feeling in the community for this project as one of several options that had been suggested in the 2014 Survey, it was presented as the only option to the unsolicited comments made in the 2014 consultations concerning the village centre and the community was only asked whether it supported further investigation into the project. **This was another example of the “tokenism” that has marred the process of consultation.** The information on the project provided in the 2015 questionnaire was limited and no indication of the likely costs and how these would be met was given. However, the 300 plus recipients of the Windlesham Magazine had been informed in the June 2015 issue that as grants from the Parish, SHBC and SCC would not be available “Residents will be asked whether they would commit to a precept on the rates for two years with this money being ring fenced for use on this project”. This was not mentioned in the preamble to Q14 in the 2015 survey and at no time has the community been asked whether it was prepared to support the VRP if they would have to find the funds themselves.

In response to the 2015 survey, the Working Group minutes for 28 August 2015 stated that the *overwhelming* majority of those who voted in the survey had given their support to a Shared Space

scheme being developed. The article in the September 2015 issue of the Windlesham Magazine also commented on the *overwhelming* support that had been given to the Shared Space Project proposal for the village centre. These comments were wishful thinking stemming from enthusiasm for the project but were not supported by the facts. The published results of the 2015 Survey show that 236 (74%) of the respondents agreed that the concept of a shared space should be progressed – this suggested interest, but not necessarily support, for a project which had not been described in any detail and which did not mention that households in Windlesham Ward might be required to fund any shortfall through a precept on the rates if public funds were not made available as mentioned in the Windlesham Magazine article of June 2015. The 236 votes in favour of progressing the scheme only represented 13% of those who would actually be required to pay for the scheme. This cannot be described as “overwhelming” support for the project in the community. Page 43 of the WNP claims that at the public consultation in September 2016 88% of those attending voted in favour of the proposals but no indication of the total number attending and who voted is provided.

At a meeting with the Chairman of the WNPSG in September 2015, I expressed my concern about whether the 236 (74% of those who responded) people who supported further investigation into the Shared Space Project would have been quite so keen if they had been made aware of how much it could cost them if the project is approved. The minutes of the May 2015 meeting of the WNPSG indicated that it could cost approximately £850,000 and also indicated that, if money from grants from WPC, SHBC and SCC and the Parish share of CIL for development in Windlesham Ward is not available, this money could be raised via a precept on the rates for all households in Windlesham. This resulted in the comment in the Windlesham Magazine in June 2015 mentioned above. With approximately 1780 households in Windlesham Ward, this could mean each household contributing just under £500 (ie £250 approx per year for two years) to pay for the Project – assuming that the costs had not increased by the time work is planned to begin. The Gantt chart approved at the meeting of the WNPSG in August 2016 indicated that the estimated costs of the whole project could be £1m (although no detailed costings had been submitted by the consultants). Having stated in June 2015 that the community would be asked to support a precept on the rates to pay for the VRP, the Windlesham Magazine of December 2016 stated that “it was not conceivable that villagers will be asked to fund it via a rate precept and we will not wish that to be the outcome in any case”. Given the limited distribution (300+) of the Windlesham Magazine and the failure to produce a regular newsletter since my departure to the 350+ followers of the WNP, there is still likely to be confusion within the community on how the VRP is to be funded. The article also suggested that the VRP, if adopted by the village, would continue in small stages as and when funds become available. This

merely emphasises the fact that the Project is unlikely to be achieved in the lifetime of the WNP and therefore has no place for continuing to be part of the WNP as the only way that support for the VRP can be indicated is if the WNP is approved in a Referendum. This means that voting for the policies in the WNP could also be interpreted as a vote for the VRP. This further suggests that at some time in the future, if other funding is not available, the vote to approve the policies in the WNP could also be interpreted as justifying raising a precept on the rates to fill any funding gap.

Projects, such as the VRP, are intended to be popular local schemes that will encourage the community to vote for the Plan but this project could cause an active opposition to the WNP to be developed and therefore could prejudice the genuine planning policies that are the main focus of the WNP. If support for the WNP in any referendum is to be interpreted as support for the VRP, it is likely that many could decide to vote against the policies in the WNP just because they are unwilling to commit themselves to any precept that they might still consider themselves liable to pay if funding from WPC, SHBC and SCC and the Parish allocation of CIL is not forthcoming. This would motivate many who do not support or are indifferent to the VRP (ie because they live in the Snows Ride area or along the A30 and are not affected by the VRP) to vote against the WNP. The continued inclusion of Appendix 8 could therefore jeopardise the achievement of the planning policies in the WNP.

Whilst the VRP is just an aspiration, it should be deleted from the WNP as it risks opposition from those who are confused about what it actually involves and how it will be paid for. It does not enhance the WNP and given the lack of any detailed costings and the unlikelihood of public funding, it is very unlikely that it could be progressed to fruition by 2028. The only way Appendix 8 on the VRP could be considered as suitable for inclusion in the WNP would be if it included a clear description of the proposals for achieving the objectives with details of the costs and how these would be met. In particular, there would have to be a categorical statement that at no stage would a precept on the rates be considered without a separate referendum.

GENERAL COMMENTS

DUE PROCESS

The NP process is meant to be led by the community and its policies based on what the community wants and is prepared to support. It should not attempt to lead the community in a direction determined by

a few hard working volunteers – however well meant. The Gantt charts adopted by the WNPSG in June 2014 and as amended in February 2015 were based on the principle that each stage in the process would be community-led by analysis of the responses from the community in the following ideal sequence: initial questionnaire on the issues; detailed analysis of the responses; recommendation to the WNPSG on the issues to be covered in the WNP; consultation on the Vision and Objectives; recommendation to the WNPSG on the options for dealing with the issues/objectives; follow up questionnaire to the community to assess the support for these options; analysis of the questionnaire; recommendation to the WNPSG on the best option for each issue/objective; development of the policies to achieve the best options as agreed by the WNPSG. This process broke down when the Working Group failed to provide a detailed “so what” analysis of the responses to the 2014 consultations by the December deadline and then conducting the 2015 survey before the detailed analysis of the 2014 survey had been approved by the WNPSG in February 2016 and subsequently published on the website. The VRP was presented to the WNPSG in December 2014 as the only option for dealing with the village centre issues raised at the Fete and in open ended comments in the 2014 survey - and well before the follow up questionnaire had been designed and the results analysed. **The 2015 survey was an example of “tokenism” where the best option had already been decided by the WNPSG before the community had been given the chance to vote on it as one of a range of options that had been suggested in the feedback from the 2014 consultations.** Therefore, although the community has been regularly consulted, the feedback has not been properly analysed before the next stage in the process was conducted. The VRP is an example of an attempt to lead the community to support an option before the community had an opportunity to decide on which option it supported. These concerns were dismissed in the Consultation Statement with the response “*As stated the Consultation document will contain details of the thorough consultation process*” and “*the whole of the consultation process was agreed with Locality*”. **This is another example of the tokenism of the 2017 Parish consultation whereby it superficially “dealt” with a comment without actually doing anything.**

The WNPSG had agreed at its meetings in Dec 2014 and Jan 2015 that the next questionnaire would assess the support of the community for the Vision, Aims and Options. I have already commented on its failure to assess public support for the Vision Statement and Objectives of the WNP. Although the 2015 questionnaire purported to be an assessment of the Options, it failed to include all the options that had been suggested by the community in their responses to the survey in 2014 which had been designed to identify the issues for the WNP to concentrate on. The 2015 follow up questionnaire should have tested the amount of support for these suggested options but it only selected a few options, presumably the ones

that those concerned subjectively agreed with, and asked about them. Only after the amount of support for the various options put forward by the community had been ascertained should the WNPSG have been making decisions on the best options and developing policies to achieve them. The VRP is an example of where the WNPSG has allowed its own views on what is best for the community to take precedence over finding out what the community's views are on the various options before making a decision on the best option. These concerns were also dismissed in the 2017 Parish consultation with the statement "Following discussions with Locality we believe due process has been followed".

When the Working Group produced its "Work in Progress" paper to the Steering Group at the end of December 2014, it claimed to be an "analysis" of the responses to the 2014 questionnaire. It identified Issues for the Neighbourhood Plan to address without any justification based on the degree of support for these reflected in the responses to the Survey. The subjective nature of this "analysis" confirmed my determination to leave a process that was becoming based on the opinions of a small group rather than objectively reflecting the views of the supporters of the Neighbourhood Plan in Windlesham. The Neighbourhood Plan process of "Identify the Issues; Gather the Evidence; Identify the Options; Decide on the Preferred option" which I had endeavoured to impress on those involved was already showing signs of breaking down as early as the January 2015 meeting of the WNPSG. At that meeting, I pointed out that the Working Group had lost its way in the process of producing a Neighbourhood Plan. Instead of reflecting a "bottom up" process where the issues were decided by an objective analysis of the views of the community, it was becoming a "top down" process where the issues were decided by individuals in the Working Group based on their own subjective assessments of the results of the 2014 Survey. When presenting the issues to be addressed to the Steering Group in the "Work in Progress" document, no attempt was made to justify their inclusion and therefore allow the Steering Group to make an informed judgement. I had realised by the February 2014 meeting, that the Steering Group, a body open to public scrutiny and governed by the Parish Council Code of Conduct, had effectively become powerless to control the activities of the Working Group, a body not open to public scrutiny. The Steering Group was being "forced" to agree to proposals put forward by the Working Group as no justification was provided for its proposals and no alternatives were identified. When I tried to get the Chairman of the Working Group to understand the correct processes and the way to proceed, I was subjected to personal abuse that led to my immediate withdrawal from the Steering Group after the February meeting. It was also clear to me at the February meeting that the Steering Group would not vote against any proposals put to them by the Working Group. There were too many members of the Working Group, or vested interests in continuing the process, sitting on the Steering Group for any rejection of the Working Group recommendations to be approved.

FAILURE TO COMMUNICATE WITH THE COMMUNITY

Until February 2015, I was the Secretary to the Steering Group and had taken on additional responsibility for the website, monthly newsletter and ensuring that articles were regularly placed in the Parish Magazine. Since my departure communication has been largely non-existent. During 2015, there had been no Tweets to the 43 followers on Twitter since 5 Dec 2014. The Facebook page (with 154 followers) had not been updated since 5 Dec 2014. There had only been one newsletter to announce the 2015 Survey, which was sent out in July to 372 supporters of the Neighbourhood Plan with an email address. I had booked a regular page in the monthly Windlesham Parish Magazine, which is distributed to nearly 400 households, but this had not been used since the August 2015 issue. The Chairman of the WNPSG merely stated that this had been due to their failure to find a replacement for my various roles and that my resignation had left the Steering Group severely weakened. There seemed to be no understanding in the Steering Group of the need to inform the Windlesham community, which they purported to represent, on what is happening and why in order to help ensure that their friends in the community would continue to support the Neighbourhood Plan at any future Referendum. Unfortunately, the lack of communication with the community and failure to explain the various ideas and developments being considered produced the situation in 2015 where there was an active opposition in Windlesham to the Neighbourhood Plan in general based on a misunderstanding of specific projects (eg the VRP scheme and village centre parking project), which are not part of the Windlesham Neighbourhood Plan and its planning policies, due to no attempt having been made to justify and explain the projects to the community. I continue to be a supporter of a Neighbourhood Plan for Windlesham but my concern is that it has become a product of a few people who have cut themselves off from the community and who interpret the results of the surveys subjectively to support their own views of what should be in the Plan.

LACK OF ACCOUNTABILITY OF THE STEERING GROUP

Whilst I was Secretary, the Parish Clerk made me well aware that, as a Sub Committee of the Planning Committee of the Parish Council, the meetings of the Steering Group would be open to public scrutiny and attendance. As a result, I ensured that the agendas for each meeting were published on the website and posted on the four Parish noticeboards in the Windlesham Ward four working days in advance and copied her in to all formal email correspondence detailing developments in the Neighbourhood Plan process so that she could keep the Parish Council and its Planning Committee informed as necessary. In addition, the Chairman of the Parish Council was also a member of the Steering Group so the Parish Council, who have accountability for the Neighbourhood Plan process for Windlesham, were also kept informed by him of developments as necessary. The approved minutes of the Steering Group were passed

	<p>to the Planning Committee via the Parish Clerk and were also published on the website. However, during 2015 following my departure, the agendas for Steering Group meetings were no longer posted on the noticeboards or published on the website and the minutes were no longer published on the website. I expressed my concern to the Chairmen that the Steering Group was operating in such a secretive way and was no longer making itself available to public scrutiny, which it should be as a Parish Sub Committee and as an organisation that purports to represent the views of the community. This did lead to improvements and since 2016 the agenda and minutes of the Steering Group meetings have been published on the website although no attention was drawn to them via Twitter or a newsletter.</p>
Environment Agency	<p>Thank you for consulting the Environment Agency on your pre-examination draft Windlesham Neighbourhood Plan.</p> <p>We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.</p> <p>However, together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p>
Highways England	<p>WINDLESHAM NEIGHBOURHOOD PLAN PRE-EXAMINATION CONSULTATION</p> <p>Thank you for inviting Highways England to comment on the Windlesham Pre-Examination Neighbourhood Plan.</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</p>

	<p>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 M3 motorway.</p> <p>We have reviewed the pre-examination consultation on Windlesham Neighbourhood Plan and have no comments.</p>
Historic England	<p>Thank you for inviting Historic England to comment on the pre-submission version of the Windlesham Neighbourhood Plan. Having reviewed the plan I am happy to confirm that we do not wish to make any comments or bring any matters to the attention of the examiner in this instance.</p>
Natural England	<p>Windlesham Neighbourhood Plan Pre-Examination Consultation (Regulation16)</p> <p>Thank you for your consultation on the above dated 29 March 2018.</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 neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this neighbourhood plan.</p> <p>For any further consultations on your plan, please contact: consultations@naturalengland.org.uk</p>
Surrey County Council	<p>Surrey County Council Response to the Consultation on Windlesham Parish Council's Draft Neighbourhood Development Plan</p> <p>Thank you for consulting Surrey County Council on Windlesham Parish Council's Draft Neighbourhood Development Plan (NDP). We have officer comments to make on sustainability, surface water flooding, and biodiversity.</p> <p>Sustainability</p> <p>We support the objectives relating to sustainability, included in Appendix 1, and consider that these might be better placed in the main document under the section entitled: 'How Windlesham benefits from a plan'. This would more clearly demonstrate how the Plan will contribute to sustainable development.</p> <p>Surface water flooding</p> <p>We suggest that reference is made to Sustainable Drainage Systems (SuDS) or local flooding policy. It would also be helpful to include a paragraph to refer to the Surrey Heath Strategic Flood Risk Assessment (SFRA) and Surrey County Council SFRA.</p>

	<p>In addition, as the area mainly comprises greenfield land, we recommend a requirement for minor developments to restrict surface water discharge to Greenfield Qbar (an estimation of the mean annual maximum flow rate) run-off rate, as required for major developments. This will help to mitigate flood risks.</p> <p>Biodiversity</p> <p>We suggest that reference is made to the Surrey Nature Partnership's document, Biodiversity and Planning in Surrey Revised May 2014, along with the appendices on protected species and sites.</p> <p>Should you have any queries about this response, or require further information, please contact James Greene by telephone on 020 8541 9377 or by email: james.greene@surreycc.gov.uk.</p>
Thames Water	<p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory sewerage undertaker for the area and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. Thames Water have the following comments to make on the consultation.</p> <p>General Comments</p> <p>The number of dwellings proposed over the plan period is relatively small and Thames Water also support the focus on brownfield sites which may have a lesser impact on existing sewerage infrastructure. However, there may be requirements for upgrades to the sewerage infrastructure such as network and/or process upgrades necessary to support development within the Neighbourhood Plan area and elsewhere within the catchment.</p> <p>Policy CP12 of the Surrey Heath Core Strategy relates to infrastructure delivery and highlights that the council will work with partners to ensure that sufficient infrastructure is provided to support development. Since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. However, given the timescales to deliver infrastructure, where there are capacity concerns phasing conditions may be required in order to ensure that any upgrades can be delivered ahead of the occupation of development.</p> <p>To minimise the potential requirement for conditions requiring phasing of development, developers should be encouraged to discuss their proposals with Thames Water in advance of submitting any planning applications. Thames Water would welcome additional supporting text within the Neighbourhood Plan encouraging developers to discuss their proposals ahead of submission.</p> <p>Contact can be made with Thames Water Developer Services by post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; by telephone on: 0800 009 3921; or by email at: developer.services@thameswater.co.uk</p> <p>I trust the above and enclosed comments are satisfactory, but please do not hesitate to contact me if you have any queries.</p>

<p>Karen Ciupak (Churchwarden) on behalf St John the Baptist Church, Windlesham Parochial Church Council</p>	<p>I am writing on behalf of St John the Baptist Church, Windlesham Parochial Church Council (PCC) in reference to the Windlesham Neighbourhood Plan currently under Pre-Examination Consultation (Regulations 16), as there is an inaccuracy in the presented document.</p> <p>On page 14 of the document, under 'Village Hall' there is reference to 'three existing village halls with meeting facilities' within the village, including the one pictured, and there is a photo of a Hall which is detailed on Appendix 6 (page 29) as 'Windlesham Village Hall'.</p> <p>Please be advised that this hall is 'Chertsey Road Hall', not 'Windlesham Village Hall', and is wholly owned and managed by St John the Baptist Church, Windlesham, PCC. Therefore, whilst the facility is currently available for hire, its purpose is to fulfil the needs of St John the Baptist Church as determined by the PCC, as owners of the property.</p>
<p>Tony Murphy</p>	<p>Please consider the following comments. I was a volunteer part of the original Neighbourhood Plan Steering Group in March 2014 and supported in principle such plans – arising from the Localism Act which intended to give residents more control over the decisions that affect their lives. I resigned after a few meetings as I was unable to support the project. I have taken an interest since that time and have made submissions to the various consultations.</p> <p>I have made representations on previous occasions about the flawed nature of the process which misrepresented its ability to meet the real expressed needs of residents – this was never actually possible. The concerns expressed in those earlier representations have not resulted in their proper consideration – so no point in repeating them here.</p> <p>Residents of Windlesham Ward – not just Windlesham Village – will be asked to vote in referendum -(only) for the Policies listed in pages 20 to 27 in the consultative document – so ideally at this stage I would focus on them, but that is not possible. To make any judgement of the Policies one must consider whether they will achieve the Objectives listed on page 19 which in turn must achieve the Vision on same page – during the period of the “Plan” (2018 – 2028). Whilst admiring the scale of ambition the stated policies will simply not achieve the Vision or Objectives – not ever, because they are not actually designed to do so. This is recognised in the document – page 19 “Vision” para 3 “ the Objectives are met through the policies that are detailed in this WNP and also in the prospective Windlesham Village Rejuvenation Project (that is outside the direct remit of the WNP) and the separate statement that consolidates all other issues and recommendations that are included in the appendix.</p> <p>It is clear that the Policies being presented are intended to meet (in part) only one of the five headline Objectives – they are directed to housing development only. It can therefore be seen to be dishonest but also perhaps unnecessary to suggest otherwise.</p> <p>Now accepting that the Policies are unconnected with the Vision and the Objectives and seeing them in</p>

	<p>this light only, there is the question of their actual benefit to this community.</p> <p>Policy WNP1.1 appears to merely conform to SHBC Policies which is not a matter of choice so is it necessary ?</p> <p>Policy WNP1.2 & WNP1.3 seem to be reasonable statements to have in place for consideration against plans arising – but without any teeth.</p> <p>Policy WNP1.4 appears to be weak and provides no benefits over the national standards so also unnecessary ?</p> <p>Policy WNP1.5 also appears weak in proposing 10 (suggest 5) or more and required to provide and required to engage</p> <p>Policies on Character and Amenity and on Design standards appear to be acceptable and perhaps useful to have on record but one would expect them to be part of the Planning Authority Policies.</p> <p>Policies WNP4.1 & 4.2 may make little contribution to the Objective.</p> <p>In my view therefore the Policies proposed do not do much to meet the stated Objectives. The majority of issues raised by residents appear in the Objectives but with no prospect or commitment to action – they are in effect in “long-term” parking. The so-called Village Rejuvenation Project has been the main focus of attention in time and cost without any prospect of advancement -without any commitment to the significant expense – unlikely in current and near future economic environment.</p> <p>If the Objective was simply to obtain the additional CIL monies as an additional financial stream for Windlesham Parish Council that may be achieved but whether it will, in practice, provide real benefit to Windlesham Ward/ Village remains to be seen.</p> <p>I acknowledge the effort of the individuals who have worked on this project but remain disappointed at what appears to be a lost opportunity. With no enthusiasm I am likely to vote “yes” in a referendum, but I fear that I will be in a minority in terms of turnout achieved.</p> <p>Thank you for considering these comments.</p>
Jeremy N Russell-Lowe	<p>Following publication of the Windlesham Draft Neighbourhood Plan (NP) the opportunity is taken to respond to the SHBC Consultation ending at Midnight this Friday 18th May 2018.</p> <p>1). Windlesham Neighbourhood Plan Launch and background</p> <p>The concept of a Neighbourhood plan (NP) was launched at Chertsey Road Hall Windlesham with the date and timing being a matter of record.</p> <p>From the moment of the launch event forward the plan was very much sold to the community as being an opportunity to deliver an all embracing plan that would enable solutions to the demands of the residents without limitation. There was no distinction or explanation made between a functioning and non-function part of the plan.</p> <p>This encouraged many residents to initially come forward to help to develop such a plan. In the majority</p>

these volunteers progressively left for a variety of reasons that have been mentioned to me which have included the dominance of the Parish Council over the preparation of the plan, a recognition that the plan was not representing the true values of the community, a weak analysis process surrounding the questionnaire responses and a consultation process that was considered neither thorough or genuinely responsive to the wishes of the community as a whole. Certainly it is a matter of record that the majority did leave the steering group. The plan as it is now has suffered dramatically for the loss of those people's skills and their passion for our Village.

It is quite clear to me and it remains my position that many questions in the second survey were based upon delivering answers that appear now to support the plans direction as required by the small remaining members of the steering group and the Windlesham Parish Council rather than the community. I took the view that this was a manipulative process and one that was impossible for the community to engage with. So few steering group members remained that the original separate groups had to be amalgamated into fewer and fewer groups ending with a handful of those who I believe had by then been developing their own plan based upon their wishes rather than those of the community. Meaningful community consultation had effectively ceased following the 2015 questionnaire.

"You're Village, Your Plan". This strap line was used throughout the consultation process leading the community to believe that the NP was truly the residents plan. The opportunity for there to be overriding influences over the process were not made apparent.

The concept that the plan could embrace all of the needs and wishes of the Village was one that prevailed and was heavily promoted. The focus throughout was entirely upon the production of a "Village rejuvenation project" (Project). Enormous and disproportionate sums of money were spent on its production and it was heavily promoted through local media, at a business stake holder meeting at the Link in Church Road, a subsequent public meeting at the same venue and at the Windlesham fete with no focus on the significance of the binding NP elements or preparation of useful policies of which there are still very few.

Throughout the period of development of the DNP No focus was put upon the legality or technicality of a neighbourhood plan or its two primary functions of enabling more development and delivering an increased percentage of CIL revenue to the Parish Council and now it would seem Surrey County Council. I can find no reference to the term "Development Plan Document" having been used to any significance or if at all during the purported public consultation process. I can find no meaningful discussion or consultation on CIL expenditure or the mechanics of this, how it would be managed or who might be able to benefit from such an income stream.

Such was the dominance of the rejuvenation project (RP) and in its failure to be transparent about the factual purpose of an NP that this project became what most believed, and still I would suggest in majority, do believe, is the Neighbourhood Plan. It is an understanding by the community now so firmly entrenched

in people's minds that it still remains my view that any referendum result would consequently be unsafe.

3. Consultation

I wrote to WPC prior to the full Council Meeting that approved the draft DNP explaining my position and serious concerns at that time, I asked for the DNP to be passed back to the community for better consultation not least within the business community but I was ignored in spite of attending that council meeting.

In evidence of this I would point to just a small number of the events and actions on the part of WNPSC that I am satisfied support my position.

My own third generation Windlesham business was not consulted and I complained at this lack of consultation only then receiving an invitation to a Stake Holder meeting at the Link.

The Stake Holder meeting held at the Link was dominated by an external presentation of the "Village rejuvenation Project" the entire evening was taken up by this presentation. The functioning of a NP was not discussed or explained and there was no opportunity to discuss the positions of the Windlesham based businesses, how they could engage with the plan process or what impact the plan might have on them. All that was discussed was parking in relation to the "Project".

I made the point at the end of the meeting that the event was meant to be a Business stake holders meeting and the Chair apologised for the lack of opportunity to discuss business matters. This is further evidenced in WNPSC Minutes of 13th June 2016 which state

10 Report on the stake holders meeting RT Reports there had been a good attendance but it was generally agreed that too much emphasis was placed on the project and not enough time given to the neighbourhood plan.....

RJE observed that no Councillor had received an invitation to attend this meeting MP apologised for this oversight

It is stated in WNPSC Minutes that only some 20 to 25 businesses were visited in the consultation process. It was further understood that questionnaires were to be distributed and collected from Windlesham businesses and then analysed into a useful document to enable an understanding of the needs of the Business stakeholders.

I can find no evidence of this having ever been carried out, certainly my business received no questionnaire and I can find no other local business that did. There is no such questionnaire published on the NP web site. The site evidences that the last published, purported, consultation response was in 2015, a year perhaps before the Link event. Similarly there is no published analysis of any purported responses from the village business community.

I see that the WNPSC brush aside my reference to a lack of business consultation by referring back to the Stake Holder meeting discussed above. This weakest of gesture simply reinforces my position that they simply are not able to substantiate a proper consultation process.

What has become apparent to me is that the WNPSC were seeking only to identify potential development sites when visiting these few businesses to enable what has become the largely secretive Development part of the plan and it is my position that the 20 to 25 businesses that were visited were those on sites that might have development potential and that the significant majority of other village based businesses were not engaged with.

There was no interest from the steering group or Parish Council in including the business community within the plan consultation. There are some 200 SME businesses in Windlesham which include rural and land based businesses, shops, restaurants and in majority very many others that are run from people's homes. These all contribute enormously to the economy of the Village but are not recognised through any form of documented or analysed consultation process.

Many home based businesses are frustrated by the progressive loss of existing commercial and employment sites within the village lost to housing. This is preventing those rural businesses from growing and having the opportunity to provide local employment for local people. Supporting rural business is high on the governments agenda and is a matter of policy

The Vision statement is clear and includes the retention of existing employment sites and making Windlesham attractive for businesses to locate to.

This statement is a misdirection and undeliverable, there has been no process that has addressed the statement and there is not a single business supporting policy within the functioning part of the plan that enables it. It is therefore not deliverable within the period of the plan

4. Development

The most secretive and least transparent element of the NP, and in my view also the most manipulative, is evidenced for example by a question in the second survey to the community as follows:- HOUSING DEVELOPMENT SITES

Response to the first questionnaire indicated considerable support for concentrating new development on brownfield sites. Member of the NP group have visited the owners, lessees, or traders of business within the area and all have indicated they are trading well and have indicated no wish to sell their land for development. One site has however been identified which may become available for development and that is Vauxhall City Church Road

The question following this statement gives some yes or no options to a number of pre-set questions and was in my opinion included to achieve a pre-conceived answer as I can see no evidence of the question having come from an analyses of the first questionnaire responses.

It is clear from responses to the first survey that the community did not want further development in the village at all with overwhelming support for retaining the Green Belt. This site sits not only in the Green Belt but also a conservation area outside of the two settlement areas so its identification does not appear to sit comfortably with the survey results.

This question for me, was certainly not put in a transparent or informative way. There is much historical evidence of planning applications on Vauxhall City. It is a particularly sensitive Green Belt, Conservation Area site which lays outside of the village settlement areas. All housing development planning applications on the Vauxhall City site have been rejected by SHBC and heavily objected to by local respondents at the time of each of those applications.

I see the inclusion of this single site as having been set out of context and nothing more than perhaps simply attempting to enable a specific development that is well documented historically as being not wanted by the community.

Further it removes an employment site and its ongoing potential as a much needed future employment site which is contrary to the explicitly stated aims of the plan. The entire legality of the NP could hinge on such factuality.

What is clear is that the WNPSC and or PC have, in spite of the above claims actually identified a good number of sites within the ward for the purpose of development, it is stated as such in the DNP, but they will not identify them, I have asked this to be done but my request refused. It is further my view that these sites could not have been identified for development if the owners had not indicated that they would be prepared to put sites forward for development. This contradicts the background to the housing question discussed above set by the steering group.

I believe that if the community are to vote on an NP then these sites must be fully identified and consulted otherwise no one can be knowledgeable about what they are voting for and may not realise the impact on the Village environment or its setting. It is for the community to have its say on any identified site through transparent and honest consultation

5. Procedure

I can find no evidence of the community being asked if they wanted to develop a Development plan Document for the Village and with that the process of enabling greater development in the village. I have put it to the WNPSC and Parish Council that if one simple question had been properly asked of the community of do you want more development in the Village of Windlesham the answer would have been a resounding no.

This position is fully underwritten by the number of objections from within the community lodged at SHBC against almost every planning application made for new housing development in Windlesham with little or no support from within our community for additional development.

It is my view that the concept of introducing an NP was introduced by the Parish Council with one objective and that was to increase the percentage of CIL monies received by them with little regard for the process involved in achieving that singular objective.

6 Conclusion

My conclusion is that this DNP has failed to be transparent in its process and will not deliver the Village

	<p>and its community the promises made at the outset of the process. It cannot deliver the promises made with regard to retaining employment sites and in the majority the pretence of the Vision statement as there are simply no policies available to enable these claims</p> <p>It has been very misleading in its promotion of the RP (Project) which has steered the community away from its true intent and technicality.</p> <p>If we are to have a plan, I would ask SHBC and the independent Inspector to recognise that it must be a plan that is truly one of the people, to the benefit of the community, is entirely open, honest and transparent and not subject to recriminations in the future.</p> <p>The community of Windlesham deserves much better consideration and if we are to have a plan please bring it back to us so that we can get it right.</p>
Paula Harrington	<p>Windlesham Neighbourhood Plan Pre-Examination Consultation (Regulation 16)</p> <p>I would like to make the point that I believe that the process of producing this draft Neighbourhood Plan has been fundamentally flawed.</p> <p>I am attaching a copy of my submission to the public consultation which ended in April 2017. My submission, dated 17th April 2019 was received by the Clerk to Windlesham Parish Council within the prescribed time period and I am now told by the Clerk that my submission was “seen and considered by the Steering Group” however my submission does not appear in the Consultation Statement which has now been published by SHBC, alongside the draft WNP.</p> <p>I have requested an explanation for this omission and understand that the Clerk needs to “clarify a couple of things” before she is able to give me a formal response.</p> <p>What is clear therefore is that the Consultation Statement is wrong and in that it gives an inaccurate and misleading representation of the number, and nature of, the responses received following the 2017 public consultation.</p> <p>It is my understanding that this consultation is a statutory process, which forms part of the formal preparation, and potential adoption, of a Neighbourhood Plan.</p> <p>The fact that a submission has been omitted from the Consultation Statement suggests, at the very least, that there has been little in the way of scrutiny and attention to detail within the preparation process. It further suggests that there are inadequate procedures in place for verifying the accuracy of what may become a formally adopted document.</p> <p>I am therefore attaching a copy of my original submission so that it can now form part of the public record.</p> <p>I am also attaching a copy of the letter which accompanied my submission which highlighted my concerns at the way that the 2017 consultation had been managed; concerns that are now magnified by this failure to include my submission in the Statement.</p> <p>With regards to the draft neighbourhood plan itself, I remain concerned that the document is</p>

incomplete.
 Surely the whole point of the plan is to demonstrate how the Vision and Objectives are to be achieved? Indeed the document states that “the following objectives are met through the policies that are detailed in the WNP.....”
 The Vision remains vague, although it has been changed in this latest draft; there is nothing in the draft plan that addresses the lofty ambition that “Windlesham Village aspires to be one of the most outstanding village in the UK”.
 I would therefore suggest that this vision should be further revised to something that is even vaguely achievable within the lifespan of the plan.
The statement that the “objectives are met through the policies...” of the plan is nonsensical and also factually incorrect.
 The plan as drafted considers only one of the objectives, Priority Housing Needs, and it is questionable whether the policies, as drafted, are robust enough to meet even this objective.
 The plan does not seek to meet, or even to consider, the following “objectives” in any way at all;

- Village centre and facilities
- Green Spaces
- Employment
- Traffic

It is therefore both factually incorrect and misleading to claim in the Vision that “the following objectives are met through the policies that are detailed in the WNP.....”
 The only objective that the draft WNP seeks to meet is;
 “Priority Housing Needs:

- Meet new housing demand through organic growth that is sympathetic to the area, ensure that the right type of housing is built in the right locations, and that a mix of housing types is delivered, to include family homes that are affordable to a wide section of the population,”

Whilst this may be laudable in its aims it is nevertheless short on detail.
 What is the “right type” and where are these “right locations”?
 Of particular concern is the reference to “Housing and Potential Sites”. Quite rightly, given that Windlesham is in the Green Belt, priority is given to “Brownfield Sites”.
 We are told that 12 brownfield sites were identified and researched but that only 11 were “considered viable”.
 The draft WNP then directs us to a 4.5 hectare site which is identified in the Surrey Heath Strategic

Housing Land Availability Assessment (SHLAA). This site however already has planning consent so the opportunity for a robust WNP to influence the development of this site with the “right type” of housing has already past.

The draft WNP fails to identify the other 10 brownfield sites that the WNPSG has researched.

The community is therefore being invited to consider something without having been given the appropriate details necessary for proper and informed consideration.

As the draft WNP does not have any policies to support its objectives on “Employment” there is a suspicion that these brownfield sites may well be existing employment sites.

How can the community be expected to vote on a WNP that is not fully transparent? That does not disclose these identified, and apparently viable, sites.

There are however other sites identified in the SHLAA which are within Windlesham and which are not referred to in the draft WNP.

Why is this?

With regard to the specific policies of the draft WNP:

Policy No WNP1.3 – Replacement of Large Houses by smaller dwellings – I would refer to my original comments in April 2017. The inclusion now of the words “or subdivision” is extremely troubling as there is an obvious risk, indeed an invitation, that this policy will lead to the conversion of larger houses into flats. The data from the Housing Type survey (Appendix 5) suggests that the community did not favour the development of flats, so why has this amendment crept in now?

Windlesham Village Rejuvenation Project

As I stated in my April 2017 submission I believe that the “Windlesham Village Rejuvenation Project” has deflected the attention of both the public and, crucially, the Steering Group away from the core WNP.

Public funds have been expended on external consultants in the development and promotion of this project which would have been better used to produce a robust and complete WNP.

Conclusion

It is my opinion this draft WNP is an incomplete document.

The stated “Vision” of the plan is unrealistic, lacking in detail and misleading and, as such, is unachievable.

The statement that the “objectives are met through the policies that are detailed in this WNP and also in the prospective Windlesham Village Rejuvenation Project ...” is both inaccurate and misleading.

The stated “Objectives” of the plan are not followed through in the policies.

The only stated objective that the plan even attempts to address is that of “Priority Housing Needs”.

This is therefore not a complete plan, nor even half a plan. At best it attempts to meet only one fifth of the stated objectives.

A robust WNP would have been one that had a realistic and achievable Vision; that set appropriate Objectives and produced well-considered policies that sought to meet all the stated Objectives.

The process by which this draft WNP has been produced has been fundamentally flawed and, as my own experience demonstrates, there has been a shocking lack of attention to detail and a failure to employ basic procedures to ensure the accuracy and integrity of the consultation process.

I trust that these comments and those contained in my April 2017 submission will be forwarded to the independent examiner for consideration.

Pre-submission consultation comments (dated 17th April 2017):

Windlesham Neighbourhood Plan (WNP) - Public Consultation

Below are my comments on the Draft Windlesham Neighbourhood Plan however I am of the opinion that the Public Consultation has not been correctly carried out and is therefore invalid.

Vision

The terms of reference for the Windlesham Neighbourhood Plan Steering Group (WNPSG) as published in July 2014 clearly stated the purpose and mission statement to be “To maintain Windlesham’s rural character whilst responding to the needs of the local people”.

This has subsequently evolved into a “Vision” which states that “Windlesham Village aspires to be one of the most outstanding villages in the UK. It will be recognised as a place to live and work that offers an unparalleled opportunity to be part of a community that provides a friendly and safe environment”.

The original statement had a specific intention where as the “vision” is vague and non-specific and is therefore effectively meaningless and without any specific strategic aims.

It should also be noted that this “vision” has been amended from that promoted at the public meeting in September 2016 as the words “within an area bounded by sites of outstanding Natural Beauty” have now been lost, without explanation.

The feedback from the 2014 questionnaire clearly demonstrated that the respondents valued the “Green spaces”, wildlife habitats” and semi-rural character of the village.

I would therefore question why the “vision” of the WNP does not echo the original purpose of the WNPSG and also the overwhelming wishes of the respondents.

I would refer you to the Campaign to Protect Rural England’s Planning Help and general principles for Neighbourhood Plans which advises that a good “Vision” should not only make it clear what the NP is aiming to achieve but will be strategic, setting out a broad picture of the aspirations of the NP.

To say that “Windlesham Village aspires to be one of the most outstanding villages in the UK” is not a strategic plan, it is waffle.

Objectives

The objectives should set out what a NP aims to achieve.

In the case of the draft WNP it appears to deal with some of the stated objectives, but others are not

followed through. We have only half a Plan - why is this?
Priority Housing Needs are considered however the other “Objectives”, apart from parking, receive no further consideration.

It suggests therefore that these objectives are not considered to be important to WNPSG. This is not the case, these issues are of concern to the vast number of respondents to your questionnaires, so why has WNPSG not produced policies to consider:-

- the preservation of the character of Windlesham Village Centre,
- the provision of community facilities,
- the protection of the natural environment and the biodiversity of our area, our wildlife habitats and trees.
- the creation of an environment for micro, small and medium sized business to flourish
- retention of the current employment sites and provision of sustainable employment opportunities

Policies of the “draft” WNP

Priority Housing Needs

This refers to “implied” needs – why are they implied? The result of the questionnaires clearly identified needs so there is no need to refer to them as implied. This is imprecise and therefore open to differing interpretations.

The policy should refer to the 1% growth rate included within the SHBC Core Strategy and define the period covered.

Policy No. WNP1.1 Scale

This draft policy refers to “the Organic Growth rate established to achieve sustainable development as noted in Section 1 of Appendix 7, shall be supported”.

The policy should clearly state what that “Organic Growth rate” is and not refer to an appendix to the plan. The Organic Growth Rate is defined as sustainable growth of 1 – 2%. This should be given a numeric value and clearly state / reinforce the time period for this growth – which should be the time period covered by the WNP – 2017 to 2028.

However it should be noted that this is in excess of the 1% growth for Windlesham defined in the SHBC Core Strategy for the period 2012 – 2028.

Please explain why the draft WNP appears to be supporting development in excess of the growth rate proposed by SHBC?

This policy should also be considered in the light of the on-going planning appeal for Heathpark Woods; if this appeal is granted there will be no justification for any further development within Windlesham for the foreseeable future.

Policy No. WNP1.2 – Small Dwellings [it is assumed that the change in reference is a typo that should have been corrected prior to publication and that this policy follows on from WNP1.1]
This supports development which includes a mix of housing sizes and types and prioritises development of “small” two and three bedroom dwellings.
This should however define “small” in terms of floor area.
It refers to “dwellings” although the results of the 2014 questionnaire indicate a marked preference for houses over flats. This policy should therefore be amended to clearly state houses (or bungalows) and not flats.

Housing and Potential Sites
This refers to identified Brownfield sites but does not identify them – why not?
Any sites identified by the WNPSG should be included for public consultation.

Policy No. WNP1.3 – Replacement of large houses by smaller dwellings
“Planning applications for the replacement of large houses in large plots in the Green Belt, with a small number of priority dwellings in a manner which ensures that the openness of the Green Belt is safeguarded should be supported.”
Firstly there should never be a presumption in favour of development on Green Belt land.
This policy is too loosely worded to protect the rural character of the village or to protect the Green Belt.
The policy should clearly state that the mass of developed area must not exceed the mass of the original dwelling (plus any Permitted Development (PD) rights that may pertain to the original structure).
For example; if you have a house with an area of 4,000 sq. ft. you can only develop smaller houses up to a maximum total built area of 4,000 sq. ft., assuming that the original house had been extended and did not have any PD rights.
The policy should also state that, in respect of developments in the Green Belt, the area covered by the new development must only cover the previously developed area of the original property.
For example; if you have a house of 4,000 sq. ft. on a plot measuring 1 acre, which comprises a previously built area of ¼ acre any new development on the site must be contained within the previously developed area and the remaining ¾ acre must remain undeveloped Green Belt.
The likelihood of the replacement of a “large” house on a “large” plot is likely to be market driven. However, if this policy is not strengthened it risks becoming a developers charter which presumes that any site in the Green Belt can be redeveloped to a density which would detract from the rural character of the village and damages the openness of the green belt and wildlife habitats.

New Development Standards
“Meet new housing demand in a way that is sympathetic to the area, ensure that the right type of housing is built in the right locations, and that a mix of housing types is delivered, to include family homes that are affordable to a wide selection of the population.”

What does this mean? What is the “right” type of housing and where are these “right locations”? The “right” type of housing should clearly reflect the wishes of the community
This needs to be more specific so that it is not open to differing interpretations about what is “right”.
How can you properly consult the Community if these definitions are not made?

Policy No. WNP1.4 – Planning Design and Access Statement
“For all developments of 10 or more dwellings, the developer is encouraged to submit a Development Planning Design and Access Statement as set out in Appendix 2.”
This policy does not make sense.
The Town and Country Planning (Development Management Procedure) (England) Order 2015 defines a “major development” as one where the provision of dwellings is 10 or more.
There is therefore already a requirement for a developer to submit a Planning, Design and Access Statement for major developments.
In order for this policy to be in any way meaningful it should be amended to refer specifically to Outline Planning Applications where currently such matters as Access, design, landscaping, layout and scale of a development can be dealt with as “reserved matters”.
The requirement that developers should be “encouraged” is laughable – how are they to be encouraged?
I suggest that this policy should be reworded to include “Outline Planning Applications” to prevent the important aspects of design, layout, scale, access of a development being deferred under “reserved matters”.
I would also suggest that the requirement to “encourage” should be amended so that submission of a Design and Access Statement is mandatory.
Finally I would suggest that this requirement should be applied to developments of fewer than 10 dwellings.

Policy No. WNP1.5 – Statement of Community Consultation
“For new developments comprising 10 or more dwellings, planning applications should be accompanied by a Statement of Community Consultation as set out in Appendix 3, and developers are actively encouraged to engage in constructive dialogue with the Parish Council and Community, as part of the design process and prior to submitting a planning application”.
This states that planning applications “should” be accompanied by a Statement of Community Consultation (SCC).
If this policy is to have any meaning it would have to be mandatory for developers to submit a SCC along with a planning application and further it should also be mandatory for the developer to consult the community.
I would question exactly what “actively encouraged” actually means. How is it envisaged that developers will be “actively encouraged”?

Unless it is made mandatory it won't happen.
 I would also question why this policy only applies to "major developments" of 10 or more dwellings.

Character and amenity

Policy No. WNP2.1 – new housing development features and compatibility
 "Planning applications for new housing developments shall be supported if they are in harmony with the existing built and natural environment by virtue of their density footprint separation and scale."
 What does this actually mean? I would hope that it means that developments such as the old Dairy site would not be permitted.
 That is an example of how the mass, height and layout of a development can have a detrimental impact on the surrounding area and be unsympathetic to their surroundings / adjoining premises.
 Again, in order to properly consult the community there needs to be more detail and definition given so that the community can constructively comment on the draft policy.

Policy No. WNP2.2 – Extensions to existing dwellings features and compatibility
 "Planning applications for extensions to existing dwellings shall be supported if they are in harmony with the existing built and natural environment by virtue of their density, footprint, separation and scale, unless it can be demonstrated that they will not harm or detract from local character."
 Is there an error in this policy – it does not read property?
 Again there needs to be more detail and definitions given, so that we can see what we are being asked to comment upon.
 You cannot properly consult the community without this detail being included.

Policy No. WNP2.3 – Spacing and Privacy
 Planning applications for either new developments or extensions to existing dwellings which respect the separation between buildings, between buildings and the site boundaries and the privacy of adjoining owners, shall be supported.
 Another typo – repeat of between buildings!
 Again this is a vague policy without specific detail – how can we comment without the details / definitions?
 I would hope this this policy would also have resulted in a more sympathetic development on the old Dairy site.
 In particular the development on this site is far too close to the highway.

Policy No. WNP2.4 – Roadside Landscapes
 "Planning applications which create viewpoints revealing interesting old and new buildings and gardens, to enhance the roadside landscape without reducing personal security or privacy, shall be supported."
 Whatever does this mean? How can we possibly be expected to comment without some explanation being given?

Design Standards

	<p>Policy No. WNP 3.1 – Design Quality Policy No. WNP 3.2 – Design Boundaries Policy No. WNP 3.3 – Garden Space</p> <p>These policies appear to be a repetition of NPPF and other supplementary planning guidance. They are not specific to the character of Windlesham Village and they do not differentiate between the historic settlement areas of the village, the settlement within the Conservation area and the more recent areas of settlement.</p> <p>The draft WNP should relate specifically to our village and not repeat national guidance.</p> <p>Vehicle Parking</p> <p>Policy No. WNP 4.1 – New Residential Developments Parking Space Design Policy No. WNP 4.2 – New Residential Developments Parking Space Standards</p> <p>These policies are presumably designed to mitigate the effect of any new development on the existing traffic congestion issues, they will not however address the existing issues.</p> <p>The location as well as the design of any new development is crucial in mitigating the effect of that development on the existing road infrastructure in Windlesham village.</p> <p>For example, the potential development of the site at Heathpark Drive, currently the subject of an appeal, will have a disastrous effect on the existing congestion problems within the village.</p> <p>This policy should therefore include reference to the location of any new development and consideration about how any development will affect the existing issues.</p> <p>Conclusion</p> <p>I am concerned that the draft WNP concentrates on residential development to the exclusion of the other stated objectives and in doing so it cannot meet those objectives.</p> <p>Many of the draft policies are not robust enough to protect the character of the village of Windlesham and, if not tightened up, can be seen as a “developer’s charter”.</p> <p>The draft WNP is however incomplete as there are however no draft policies which relate to:</p> <p>Village Centre and facilities:- Green Spaces Employment</p> <p>Why have these objectives been written into the draft document if they are not being followed through? In failing to follow through with policies that relate to these objectives it is giving the impression that these matters are not of concern to the community, which is clearly not the case.</p> <p>I would therefore suggest that the draft WNP needs to go back to the drawing board.</p> <p>The vision should reflect the wishes of the community and be a more specific achievable aim.</p> <p>All the objectives need to be addressed – in particular those relating to the Environment and Habitats and those relating to businesses.</p>
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In not producing any draft policies to follow through with the objectives to “make it attractive for micro, small and medium sized businesses and shops to locate and flourish in the area” and to “retain the current employment sites and provide sustainable employment opportunities..” there is a clear implication that the WNPSG are happy for Windlesham to become a purely residential dormitory. Apart from a commitment to encourage new businesses into the village the NP should include a commitment to support and encourage those businesses already established in the village so that they can continue to provide employment opportunities and bring wealth into the village. There is a further implication that some of these existing business sites are being viewed as potential brownfield development sites for even more residential development. The draft WNP should include a policy to protect existing employment sites and to resist any applications for changes of use unless it can be proved that the site is not a viable business site. Existing permitted development rights only apply to office accommodation B1 and therefore does not relate to any other business use and relate only to a change of use of the building, not redevelopment of the site. The policies on residential development need to be strengthened to protect the character of the village. The policies as drafted are too weak and vague to provide a robust protection to the village and can be viewed as a “developer’s charter”. This needs to be addressed as a priority.

Windlesham Village Rejuvenation Project

This project has received considerable publicity both in the Parish Magazine and at the various consultation meetings which have been held, apparently to consult the village on the WNP. This Project has also been promoted with the aid of external consultants who presented their proposals at the meeting held in June 2016, to which village business and stakeholders were invited and an audio visual presentation formed a large part of the public consultation in September 2016. This project is however outside of the scope of a Neighbourhood Plan and should never have been allowed to become confused with the development of the Windlesham Neighbourhood Plan. There is therefore the danger that there is public perception that the rejuvenation project is linked to the WNP and that a vote in favour of the project is a vote for the WNP and vice versa. I am of the opinion that pursuit of this project has therefore deflected public attention away from the draft policies of the WNP and the potential impact of these draft policies. I also believe that it was wholly wrong for public funds to have been used to promote this project and to have been used to engage consultants, who had not even been briefed to consider the traffic related matters of most public concern. At the Businesses and stakeholder meeting in June 2016 the majority of the meeting was given over to a presentation by Phil Jones Associates, rather than concentrating on the draft plan. Phil Jones Associates admitted that their brief had not included considering the issues of parking on Chertsey Road or the

concerns about heavy vehicles coming through the centre of the village.
The public monies would have been better spent engaging a planning consultant to assist with the preparation of the WNP.
This project is both impractical and expensive and on a cost / benefit analysis cannot be justified. It will do nothing to enhance the character of the village centre and will not address the concerns about the village being a “rat run” for traffic.
This project has been a waste of time and money that could have been better spent on a planning consultant who could have produced a more robust draft WNP to include draft polices to support all the stated objectives in a realistic and achievable way.
I would be grateful if you would please acknowledge receipt of my response to the draft WNP and also confirm that my response will be summited to the WNPSG. I trust that the Steering Group will publicise the consultation comments received and that the appropriate changes will be made to the draft WNP before it is submitted to SHBC.

Letter regarding WNP Process

Windlesham Neighbourhood Plan (WNP) – Public Consultation (dated 17th April 2017)

I am writing to express my opinion and concern that the Public Consultation has not been properly conducted and is therefore invalid.

The Campaign to Protect Rural England provides advice on how the public should be consulted upon a draft NP and suggests that such consultation can be done through a variety of means including written consultations, events and meetings.

They advise that the consultation process should be carefully designed with clear questions asked and with people given easy-to-understand instructions to identify which parts of the draft NP or the accompanying documents they are commenting upon.

Further, when the draft NP is submitted to the local authority the Steering Group should include information on how they consulted the community, what responses were received and how any comments made were taken on board in revising the draft. It recommended that a “consultation comments schedule” is prepared and submitted; this should set out who the comment is from, what part of the draft NP it refers to and your response to the comment made (such as changes made to the draft NP).

I do not consider that the WNPSG has properly consulted the residents of Windlesham Ward on the draft WNP.

The guidance on how to comment is non-existent. Why were no clear instructions given or specific questions asked to assist residents through the consultation process?

The WNP Steering Group appears to be relying on residents being aware of the consultation period, without making a comprehensive effort to inform the public.

The consultation period has been advertised on the WPC website, through the WNP website and via the Windlesham Society website and Parish Magazine.

I understand that the current circulation of the Windlesham Parish Magazine is approximately 300 and that the Windlesham Society has a similar sized database of contacts. However the likelihood is that there will be a significant overlap between these two circulation lists. Even assuming that the overlap is only 50% it results in a potential circulation of only circa 450 households.

To my knowledge there has been no publicity circular distributed to the residents of Windlesham alerting them to the Consultation period, although this was discussed at the WPC meeting in January.

I have recently become aware that a further document has appeared on the WNP website timeline. This document is headed additional issues and is dated 3 March 2017 and has apparently been approved by the Windlesham Parish Council.

There has been no additional publicity about this document which related to additional issues raised by residents which are outside the WNP. It is not clear what the purpose of this document is but, as it has not been publicised, the community have not been afforded a proper opportunity to comment on the “recommendations” contained therein.

I would therefore question how the WNP Steering Group can be satisfied that they have conducted a thorough consultation and ensured that the maximum number of Windlesham residents are aware of the consultation taking place.

I would be pleased to hear from the WNPSG regarding their poor publication of the WNP public consultation and whether they consider that the consultation has been properly conducted.