

This document summarises representations received in response to publication of the Bookham Neighbourhood Development Plan (BNDP).

The BNDP was published on 12 February 2016 for six weeks. The deadline was subsequently extended slightly, to 6 April 2016.

Each representation has a reference number (column 1). Column 2 provides the name of the individual responding, with the organisation they represent, where relevant. Column 3 is a summary of the key points raised. Full copies of each representation will also be made available to the Independent Examiner.

TABLE 1: RESPONSES FROM STATUTORY CONSULTATION BODIES		
BKNDP_Stat1	Southern Water	No comments - Bookham is outside Southern Water operational area.
BKNDP_Stat2	Thames Water	<p>Policy BKIN2: Drainage</p> <p>Benefits of SUDS are recognised, but SUDS are not appropriate for use in all areas, including areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance.</p> <p>Thames Water seeks to limit volume and rate of surface water entering the public sewer system. It is requested that the following paragraph should be included in the Drainage section of the Neighbourhood Plan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</p> <p>BKIN2 should be improved in relation to water supply and wastewater infrastructure. Refers to relevant NPPF and NPPG extracts.</p> <p>Net increase in water and wastewater demand to serve development as a result of the NDP is unclear at this stage. Advice is given for developers to engage with Thames Water at the earliest opportunity regarding water supply, sewage, drainage and flood risk issues.</p>

		<p>The following text should be added to the NDP:</p> <p>“Water Supply, Wastewater & Sewerage Infrastructure</p> <p>“Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.</p> <p>“Drainage on the site must maintain separation of foul and surface flows.</p> <p>Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</p> <p>“Further information for Developers on water supply and sewerage infrastructure can be found on Thames Water’s website at: http://www.thameswater.co.uk/home/11425.htm</p> <p>Or contact can be made with Thames Water Developer Services by post at: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading RG1 8DB; by telephone on: 0800 009 3921; or by email: developer.services@thameswater.co.uk”</p>
BKNDP_Stat3	Mike Waite, Surrey Wildlife Trust AND Surrey Nature Partnership (joint response)	<p>Welcomes all environmental policies, especially Policy BKEN1 designating Local Green Spaces within the built up area, Policy BKEN2 protecting trees and hedgerows and Policy BKIN2 requiring developers to implement SuDS.</p>
BKNDP_Stat4	Kath Harrison, Surrey County Council	<p>Many of SCC’s Comments on the pre-submission NDP have not been taken on board. They are reiterated, along with additional comments re education, transport and flooding.</p> <p>Education:</p> <p>Several inaccuracies are noted re local secondary education provision (see BKNDP_Stat4 paras 2-6). These should be corrected.</p>

		<p>BKEN1: Local Green Spaces</p> <p>The policy restricts future development on school sites and could prejudice future provision of essential education facilities. Designation of these sites conflicts with several NPPF criteria for designation of Local Green Space.</p> <p>Flooding:</p> <p>Appendix 12</p> <p>Surrey County Council should be referenced as a source for up to date information about surface water flooding, or the list in Appendix 12 should include a caveat that the information might be out of date. Information should be added about Surrey CC pre-application advice service for developers re surface water drainage.</p> <p>Transport:</p> <p>The NDP includes little mention of public transport. It should include reference to the scope for local improvements.</p> <p>Policy BKH2: Infill and Garden Development</p> <p>It may not be necessary or reasonable to request footways on all access roads, particularly if they serve small sites or are provided with an appropriate shared surface arrangement.</p> <p>Policy BKH3: Parking Space Standards</p> <p>The proposed parking standards do not accord with the Surrey County Council guidance “Vehicular and Cycle Parking Guidance” January 2012. They need to be considered as an exception to the District Council’s policy approach.</p>
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		<p>Policy BKIN1: Highways</p> <p>The proposal to direct a proportion of NCIL towards highway improvement schemes is welcomed.</p> <p>Comments are provided on specific schemes included in the NDP (see BKNDP_Stat4 for details).</p>
<p>BKNDP_Stat5</p>	<p>Martin Small, Historic England</p>	<p>BKEN1: Local Green Spaces</p> <p>The reasons for identification of Local Green Spaces should be specified. Lack of such justification leaves policy BKEN1 open to challenge.</p> <p>BKEN2: Trees and Hedgerows</p> <p>The identification of trees and hedges as a key feature of local character is supported, as is the use of policy to ensure hedgerows are retained or reinstated through development.</p> <p>BKEN3: Design and Character</p> <p>Use of policies to sustain locally distinctive character and high quality design is supported. Welcomes the addition of a reference to the Mole Valley DC Character Appraisal of Bookham.</p> <p>Still feel supporting text and policy are at variance. Supporting text notes importance of variety in architecture and materials. Policy wording is more conservative and avoids contrasting styles and materials.</p> <p>Suggests revised policy wording, to include reference conservation area appraisal and character appraisal: “All new development must demonstrate good quality design and respect the character and appearance of the surrounding area. This means responding to, and integrating with the positive features of the local surroundings and landscape context, which should be identified through reference to the Council’s conservation area appraisal and Bookham and Fetcham character appraisal. Good quality design means: ...”</p>

		<p>BKEC1: Safeguarding our Retail Centre</p> <p>Supports use of BKEC1 to define function of retail centre and its contribution to village character.</p> <p>Policy should include wording to reflect that the retail centre lies almost entirely within Great Bookham Conservation Area. Suggested amended wording:</p> <p>“Development within the conservation area and in its setting will be required to be of a scale that reflects that of the area’s historic buildings and should not dominate its surroundings, either through the choice of form, materials or lighting. The choice of materials, massing and detailing, including the form of roofs, shopfronts and fenestration should reflect those of the area’s historic buildings in order to sustain the area’s character and should be chosen with reference to the conservation area appraisal. Within these parameters, innovative design and construction to support access, improve energy efficiency and provide adaptable retail space will be supported.</p> <p>Alteration to existing shopfronts within the conservation area will be required to sustain the historic and architectural interest they contribute to the area, as described in the conservation area appraisal, and should not result in the increase in height of fascias or the introduction of internally illuminated box fascias that detract from the area’s character. Applications that conform with the Council’s shopfront design guide and that enhance modern shopfronts identified as detracting from the character of the conservation area in the Council’s conservation area appraisal will be supported.”</p> <p>The above suggestions would make a more robust NDP, but Historic England do not consider that the NDP fails any of the Basic Conditions.</p>
BKNDP_Stat6	Arnold Pindar, Effingham Parish Council	<p>Notes similarities between Effingham and Bookham villages, but the approach of two village areas and local authorities are different.</p> <p>Comments made on pre-submission draft NDP do not appear to have been taken on board.</p> <p>NDP lacks consideration of Little Bookham and what is special about it. Its special nature and history merit more detailed consideration – e.g. in the Summary on p4 and The Constraints, Green Belt on p10.</p>

		<p>Little Bookham shop's role in serving the Little Bookham area should be mentioned.</p> <p>The NDP lacks any mention of the two Conservation Areas. There is no mention of the measures contained in the Conservation Area Appraisal and Management Plans for Great Bookham and Little Bookham which were carried out in 2011. These should influence NDP policies on design and character and strengthen points on infrastructure.</p> <p>Failure to adequately protect the Little Bookham Conservation Area could impact on Effingham village and its Conservation Area.</p> <p>Although building on the Green Belt is precluded, the NDP should still include statements about preserving existing green gaps between Little Bookham and Great Bookham and between Little Bookham and Effingham. The value of such gaps for wildlife should be recognised. The NDP should support wildlife corridors to allow movement between protected sites (see BKNDP_Stat6 for specific locations listed).</p> <p>Policy BKIN3: Education</p> <p>This policy appears to support proposals for rebuild of Howard of Effingham School, to which Effingham Parish Council are strongly opposed. It appears in direct opposition to representations made by Bookham Vanguard, opposing the Howard of Effingham planning application (now refused).</p> <p>The NDP section on Bookham's educational needs requires further consideration. Effingham Parish Council would be pleased to work with Bookham Vanguard and other groups to ensure appropriate educational provision across this part of Surrey.</p> <p>The NDP should recognise that there is capacity at Therfield School. The statement that Howard of Effingham is "consistently oversubscribed" is inaccurate.</p> <p>Policy BKIN5: Community Facilities</p> <p>The list should include the United Reformed Church Hall and Baptist Church Hall.</p>
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		<p>Policy BKH1: Smaller Homes for Downsizing and New Families</p> <p>This could be expected to result in very few two bedroom residences. The NDP should specify actual sizes and percentages for all preferred developments.</p>
<p>BKNDP_Stat7</p>	<p>Steve Swain, Environment Agency</p>	<p>Overall supports the NDP. The policies largely support the environmental objectives of the Mole Valley Local Plan and of the National Planning Policy Framework, as described within the Basic Conditions Statement.</p> <p>The main environmental issues concerning the area covered by the plan are:</p> <ul style="list-style-type: none"> • Flood Risk • Biodiversity / Water Quality <p>Flood Risk:</p> <p>Welcomes the consideration of flooding and drainage issues in Bookham and identification of specific 'wet spots'. Accepts that the primary risk of flooding is via groundwater and surface water. Surrey County Council as Lead Local Flood Authority is best placed to comment upon these issues.</p> <p>BKIN2: Drainage</p> <p>Supports inclusion of this policy and the opportunity to consider utilising funds such as CIL to improve existing drainage problems. Appendices 12 and 13 highlight the approach that should continue. The Flood forum remains the best placed mechanism to highlight and discuss issues and to be able to prioritise investigations and assess funding options.</p> <p>There was no recorded fluvial flooding in this area in the winter 2013/2014 floods.</p> <p>Highlights source of EA guidance on updated climate change allowances.</p>

		<p>Biodiversity / Water Quality:</p> <p>The only watercourse in the Bookham neighbourhood boundary is the Bookham Brook to the north west, which forms part of the boundary between Mole Valley and Guildford districts. This is part of the Water Framework Directive water body Downside Ditches and Bookham Brook.</p> <p>Suggests the NDP should include mention of this watercourse, which is not currently referenced. Any new development should seek opportunities to improve the status of this water body.</p> <p>Policy BKEN3: Design and Local Character</p> <p>Supports inclusion of sustainable urban drainage, which will provide biodiversity and groundwater quality benefits, within the definition of good design.</p>
BKNDP_Stat8	Rebecca Micklem, Natural England	<p>NB – LATE RESPONSE, RECEIVED 27/5/16</p> <p>Notes that the plan does not allocate any sites for housing and that policy BHK4 states that measures to mitigate the impact of large scale housing developments on the Thames Basin Heaths Special Protection Area and the Bookham Common Site of Special Scientific Interest will be required in the light of advice from Natural England at the time of the planning application.</p> <p>Advises that reference is made within the plan to screening out of likely significant effects on the Thames Basin Heaths Special Protection Area, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2010.</p> <p>Provides a copy of Natural England advice on natural environment issues of relevance to Neighbourhood Planning.</p>

TABLE 2: RESPONSES FROM RESIDENTS, LOCAL GROUPS, LANDOWNERS AND OTHER INTERESTED PARTIES		
Reference	Name	Summary of comments
BKNDP1	Anne Eagle	Supports the Bookham NDP. The NDP reflects community engagement and gives an accurate picture of majority views.
BKNDP2	Ian Nayler	Supports the Bookham NDP.
BKNDP3	Andy Hasted	Supports the Bookham NDP.
BKNDP4	Martyn Pearson	Supports the Bookham NDP. Agrees with the identification of infrastructure needs, and the need for smaller housing for younger families and retired people, as key issues for Bookham. Also supportive of Bookham Vanguard's consultation and engagement strategy. Expresses concern about the underlying premise of the Mole Valley Core Strategy 2009 viz sustaining population growth in order to foster economic growth.
BKNDP5	Nigel Smith	Supports the Bookham NDP.
BKNDP6	Judy Smith	Supports the Bookham NDP.
BKNDP7	Peter Almond	Policy BKEN3: Design and Local Character Welcomes green road verges but concerned that this results in narrow paths which causes access difficulties for the elderly and disabled. Policies BKH1 - BKH4 Housing policies are admirable but unclear how they would be enforced. Policy BKEC2: Lower Shott Any development of Lower Shott must protect existing retailers and consider car parking. Parking restrictions at the end of Dorking Road should be extended as there are safety issues at this junction. Appendix 11 - Highways

		<p>High Street should be closed to HGVs. Consideration should also be given to one way traffic arrangements between the A246 and Lower Road.</p> <p>Appendix 16 – Reinforcing, safeguarding and consolidating the Retail Centre Issues with car parking restrict the potential of the retail centre.</p> <p>Appendix 5 – Doesn't say what it is.</p> <p>Subject to the above, supports the Bookham NDP.</p>
BKNDP8	Betty Woodhams	<p>Supports the Bookham NDP.</p> <p>The character of the village should be retained. Concerns about the current standard of roads and the strain on existing medical facilities, particularly considering the ageing population in Bookham.</p>
BKNDP9	P S Blunden	<p>Supports the Bookham NDP.</p>
BKNDP10	John Humphreys, Bookham and Fetcham Gardeners Association	<p>Requests an amendment to Appendix 6 'Local Green Spaces', to include Eastwick Allotments.</p> <p>Eastwick Allotments is identified as Strategic Open Land in the Mole Valley Local Plan 2000, Policy ENV20 'Strategic Open Land within Built Up Areas'. The association is not seeking to change this.</p> <p>Request that Eastwick Allotments is also listed as a 'Local Green Space' in Appendix 6 of the Bookham NDP. Eastwick Allotments meet the criteria for designating Local Green Space as set out in the NPPF, paragraph 77.</p>
BKNDP11	Ed Criswick	<p>Supports the Bookham NDP.</p> <p>NDP reflects considerable consultation with the community reflects the wishes of the majority.</p>
BKNDP12	Fred Roberts	<p>General support for the Bookham NDP.</p> <p>Makes the following points:</p> <p>Policy BKH1: 'Smaller homes for downsizing and new families' Greater emphasis should be given to the provision of social housing for rent and smaller houses for young people and for older down sizers.</p>

		<p>Policy BKH2: 'Infill and garden development' The redevelopment of any back garden land should be prohibited</p> <p>Policy BKH3: 'Parking Space Standards' The proposed car parking requirements should be the minimum. The Plan should be amended to require at least a further space, to avoid on street parking, traffic obstruction and safety hazards.</p> <p>BKIN4: 'Local Healthcare' Provision should be made to expand or re-site at least one of the doctor's surgeries. The Eastwick Surgery has increasing patient numbers and inadequate parking.</p>
BKNDP13	Anne & Anthony Berry	<p>Generally supportive of the Bookham NDP. The Plan provides sound guidance on deciding plans for future development, however greater emphasis should be placed on protecting the AONB/AGLV and Green Belt which supports wildlife, flora and fauna and provides the setting that makes Bookham an area to "cherish".</p> <p>Policy BKEN3: 'Design and local character' Supports the emphasis given to protecting hedgerows and trees, but the requirement for SuDS should be highlighted further.</p> <p>Policy BKH2: 'Infill and garden development' Greater emphasis should be given to ensuring a suitable and safe access to infill and garden development. This should be a key consideration in the determination of planning applications.</p> <p>Policies BKIN1 – BKIN5 The Plan refers to using CIL funds to support a range of community projects, concerned that the range of needs arising from increased housing will far exceed CIL funds. MVDC should consider an immediate allocation of funds to assist with infrastructure provision which is needed to prevent an imbalance between increased development and infrastructure.</p> <p>Policy BKIN3: 'Education' It is not practical to consider developing Polesden Lacey Infant School into a Primary School when there is no land available to provide a playing field. The AONB and Green Belt should not be compromised. This highlights concerns regarding increased development and demands for infrastructure. However, it is</p>

		<p>also essential that SCC deliver a suitable local offer for all school age children particularly for attracting young families to Bookham.</p> <p>Policy BKEC4: 'Safeguarding land in industrial and commercial use' More evidence is needed on the use of industrial and commercial sites. There needs to be a method of measuring the contribution to local employment and weighing it against the contribution of building housing on such sites within the community. It should be noted that businesses are operating in many different ways today. A regular re-assessment of the evidence may be required.</p>
BKNDP14	David Foster	<p>Supports the Bookham NDP.</p> <p>Supports in particular the identified need to build smaller homes for downsizing and families.</p> <p>Policy BKIN1: 'Highways' / Appendix 11 - Highways Infrastructure will be an important consideration for any new development. Lower Road is already congested at certain times, suggests the following:</p> <ul style="list-style-type: none"> • Lower Road (from Effingham Common Road to Common Road) should be made narrower to the minimum width required for two commercial vehicles to pass each other • A speed restriction of 20 mph should be enforced along the length of the road • The pavement should be widened and then divided into two sections, one for pedestrians and one for cyclists.
BKNDP15	Peter Clarke	Supports the Bookham NDP.
BKNDP16	Christopher Cheverst	<p>Appendix 11 - Highways</p> <p>The Lorne - it is normally impossible to drive down this road much over 20mph because of parked cars and it being a short road. Traffic calming is not required and would be a waste of public money.</p> <p>Little Bookham Street - the narrow section contributes to the semi rural character of the area. It also acts as a pinch point so slows the traffic. Should this be widened then vehicles will start charging down at 40-50 mph. MVDC / SCC will then be pressured to traffic calm. In addition some of the houses on the east side of Little Bookham Street have very short front gardens and drives, they will have nowhere to park and even more access difficulty. The houses on the west side are up on a bank. To provide them with access will involve costly civil engineering work to level and smooth driveways and the construction of retaining walls. This would affect vision lines.</p>

		<p>In addition several metres of this land is owned by The National Trust, over whose land householders have to cross in order to gain access to the public highway.</p> <p>(Also comments on matters outside the scope of the Bookham NDP, viz amount of development, pressure on infrastructure and proposals relating to Howard of Effingham School.)</p>
BKNDP17	Peter Death	<p>Disappointed that as the Plan has evolved less emphasis has been given to the benefits of a small number of large developments over a large number of small developments.</p> <p>Policy BKEN3: 'Design and Local Character' While the Plan lists some of the key characteristics of Bookham it seems to omit many of the key points in the 'Mole Valley Built Up Areas Character Appraisal – Bookham and Fetcham'. The key points which have been omitted include:</p> <ol style="list-style-type: none"> 1. Houses often set back behind well maintained front gardens. Wide streets, grass verges and lateral separation between buildings combine to create a strong sense of spaciousness. 2. House plots mostly of regular size/spacing, creating a sense of coherence despite variety of house design. <p>This sense of lateral space is what distinguishes Bookham from the likes of Dorking and Reigate. The sense of lateral space needs to be protected more so than the actual size of the village.</p> <p>Policy BKH1: 'Smaller homes for downsizing and new families' Inherent contradiction in saying that Bookham is a nice place to live that we don't want to change and then wanting to fundamentally change the housing stock so that it is more appealing to older residents than families. This will change the character of Bookham. It may appeal more to an ageing population but this will not encourage families to move or remain in Bookham as family suitable homes will become rarer and therefore more expensive.</p> <p>Policy BKH2: 'Infill and Garden Development' The suggested minimum distance of 1m between properties is much smaller than the current Bookham average and implementing this would change the nature of Bookham</p> <p>More emphasis should be placed on developments closer to the railway station. The train station is</p>

		currently some distance from the majority of houses which limits its usefulness.
BKNDP18	Paul Lambert	Supports the Bookham NDP. The Plan will ensure the village is able to attract younger families and older people with the focus on 1-3 bedroom dwellings. It also shows a real focus on keeping the character of the shops / high street.
BKNDP19	Patricia Turner	Supports the Bookham NDP.
BKNDP20	Anthony Farino	The Plan lacks certainty. It must be precise not only about where to develop, but also to show positively how to meet the declared need. The Plan is of admirable and unchallengeable aspirations but it is incomplete. Many of the issues are beyond Bookham Vanguards control – however if the scenario in the Plan was the totality of development solutions for Bookham for the next ten years it would result in continued urbanisation within the contained boundary, which would destroy the very reason living in Bookham is so attractive. The declared absence of brownfield land in Bookham means that the development of houses, schools and medical facilities are confined to back gardens, or require a necessary sacrifice of employment space or playing fields etc. Remains hopeful that the new Mole Valley Local Plan will consider the development of Bookham more realistically and include Green Belt sites which least offend the principles of Green Belt preservation.
BKNDP21	Jane Neville	Supports the Bookham NDP.
BKNDP22	Sarah Pitt-Bailey	Generally supports the Bookham NDP. The proposals seem very vague with few definite plans and mostly just recommendations. Policy BKIN4: ‘Local healthcare’ Interested in the idea of a new doctors surgery in Fetcham to reduce the workload of the Bookham practices. Would like to see the introduction of one hour of free parking behind the shops on the high street. This would encourage more people to use the shops and discourage daytime parkers. Policy BKH1 – BKH4

Bookham Neighbourhood Development Plan
Regulation 16 consultation (12/2/16 to 6/4/16): Summary of Responses

		Supports the housing development policies.
BKNDP23	Brian Neville	Supports the Bookham NDP.
BKNDP24	Catherine Jager	Supports the Bookham NDP.
BKNDP25	Anthony Alsbury	Supports the Bookham NDP. Future planning decisions on the Howard of Effingham School should consider any additional infrastructure which may be required.
BKNDP26	Roger Hutton	Supports the Bookham NDP.
BKNDP27	Martin Hollins	The recommendations in the NDP are well-founded. The issue of housing provision for younger residents, with and without families, has rightly been raised as most important. The suggestion that large houses be converted, and built, for multi occupation, to preserve the nature of the village, but provide for its population need, is a good one.
BKNDP28	Iain White	Supports the Bookham NDP.
BKNDP29	Peter Witter	Supports the development of an NDP for Bookham. Policy BKH2: Infill and garden development This policy should be strengthened by adding the following point between points 3 and 4: <i>“Outside the central area, the build density (defined as the total ground footprint of each dwelling as a percentage of the net site space assigned to that dwelling, excluding any access driveways) should not exceed 25%. This restriction should apply to both the proposed new dwellings and any donor properties.”</i> The reason is that sites available for development are becoming smaller but developers are still building individual properties that are not reducing in size. The limit of 25% is based on analysis of recent planning applications by the Bookhams Residents’ Association. Analysis indicated that successful planning applications generally had a density less than 25% and those with greater densities had generally been rejected by MVDC. This limit would therefore codify MVDC current practice. Greater density would allow less and less amenity space around properties, less space for planting, and more possibility of noise and pollution, with an adverse effect on

		the character of Bookham, which the NDP is striving to protect.
BKNDP30	Ignazio Di Giovanna	Supports the Bookham NDP.
BKNDP31	Annette Di Giovanna	Supports the Bookham NDP.
BKNDP32	P M Cole	<p>Comments are submitted as personal views, but based on lengthy experience in town planning and housing, including as a director of a house building company operating in Bookham and Fetcham.</p> <p>Acknowledges work of volunteers of the Bookham Vanguard. Highlights evolving central Government guidance and policy, as well as legal judgements on interpretation of the Localism Act and NPPF.</p> <p>The Mole Valley Local Plan is not up to date within the meaning of the NPPF. DCLG household forecasts predict household growth of 350 households per year in Mole Valley, against a figure of 171 dwellings per annum used for Mole Valley housing land supply figures published April 2015.</p> <p>The Local Plan Expert Group report published 16 February 2016 identifies under provision for the supply of homes in the region.</p> <p>Mole Valley DC have not assisted fully in the preparation of the BNDP through failing to keep the Mole Valley Local Plan up to date.</p> <p>The level of housing growth anticipated in the BNDP does not reflect projected population growth. Therefore the environmental and housing related policies cannot be considered up to date as they are based on an out of date Local Plan.</p> <p>The community is not well served by adopting an over protective, restrictive and largely aspirational “keep our environment the same” BNDP that will be given little weight at future appeals and may be subject to judicial review.</p> <p>Comparison is drawn with a recent decision on the Haddenham Neighbourhood Plan (Aylesbury vale DC).</p> <p>Although changing the settlement boundary is the responsibility of the LPA due to the Green Belt status, it would be sensible for the BNDP to identify reserve sites beyond the current settlement boundary,</p>

		which can be considered for release if the need is demonstrated.
BKNDP33	Diane Pratt	<p>Appendix 12</p> <p>The Appendix does not cover all flooding issues that need addressing.</p> <p>East Street and the Recreation Ground should not be grouped together; they are very different areas.</p> <p>Sources of flooding in East Street, the Recreation Ground, Eastwick Drive, Greenacres and Westfield Drive are identified and described (see comment BKNDP33 for details). The BNDP should address these issues.</p> <p>There is a need for surface water drainage infrastructure in The Park.</p> <p>Outfalls from the four ponds are not properly managed and lead to flooding at various locations.</p> <p>Bookham has suffered from flooding on several occasions since 2000 and the NDP should address reduction of flood risk.</p> <p>There are several watercourses which are not mentioned. They need to be included so they can be accommodated.</p> <p>Policy BKIN2</p> <p>The policy refers to SUDS, but these measures do not work in north Bookham, which is on impermeable Lambeth Clay. Installing soakaways only adds to surface water issues.</p> <p>MVDC Core Strategy policy states that development should not increase flooding but in Bookham this is not the case. The policies are not correctly implemented.</p>
BKNDP34	Robert Symons, Vortal Properties	Comments submitted on behalf of landowner at Land at Long Maddox Farm, Little Bookham.

		<p>Policy BKH2: Infill and Garden Development</p> <p>The adoption of this policy will constrain and restrict the required housing numbers needed through the NDP period. Whilst we agree that infill development could supply some of the housing figures, the decision to ignore any rationale releases of greenbelt is unrealistic.</p> <p>Exclusion of any Green Belt review could result in the housing need within the Parish being unmet and compromising future sustainable growth in the village through piecemeal development by way of speculative five-year housing land supply applications.</p> <p>Sites within the Green Belt that are well related to the existing village settlement and sustainable in nature, should be given more weight as development options. With the expected change in National Planning Policy towards Starter Homes units being developed within the Green Belt, the plan focuses on the past and present, without planning for the future.</p>
<p>BKNDP35</p>	<p>Matthew Roberts, Martin Grant Homes</p>	<p>The draft NDP has not set out a quantum of housing to be delivered and not specifically identified or allocated any housing sites.</p> <p>Mole Valley's Core Strategy is out of date. It does not accurately represent the District's needs and direction of future growth. The NDP should conform to the Strategic Polices, which are currently out of date. One of the basic conditions is that NDPs should be in general conformity with the strategic policies contained in the development plan. S.38 of the Planning and Compulsory Purchase Act 2004 defines "development plan" as the development plan documents (DPDs) adopted for the area and Schedule 8 extends this to include saved policies. So where there are no DPDs in an area the examiner must consider whether the draft NDP is in general conformity with the strategic policies in the saved local plan.</p> <p>The NP fails to contribute sufficiently to the Objectively Assessed Need (OAN) of the district, as the Core Strategy is out of date and more up to date household figures are available. It doesn't specifically identify the need for housing and growth. This lack of flexibility is not reasonable or sustainable planning.</p> <p>Policy BKH1: Smaller homes for downsizing and new families</p> <p>The policy identifies the Central area of the village to accommodate smaller homes. However it remains</p>

		<p>unknown if the central area can accommodate any housing at all. No site identification or review process has taken place.</p> <p>Policy BKH4: Large scale housing developments</p> <p>Policy BKH4 would require a Strategic Environmental Assessment and a screening would be required as part of European legislative directive.</p> <p>Neighbourhood planning is about shaping the development of a local area in a positive manner. It is not a tool to stop new development proposals from happening and should reflect local and national policies. Neighbourhood plans and orders should not promote less development than set out in the local plan or undermine its strategic policies</p> <p>The NDP is over restrictive and precludes appropriate sustainable development if it is adopted.</p>
BKNDP36	James and Eleanor Hackett	Supports the Bookham NDP.
BKNDP37	Anand Gandhi	<p>Agrees with some of the main points in the NDP, these being: residents value the village atmosphere, more housing is required, infrastructure improvements etc. However the NDP seems to be skewed to older residents.</p> <p>While statistics indicate an increase in the older population between 2001 and 2011, it is now 2016 and this may have changed with recent developments. There have been several family orientated developments in the last three years and younger families have moved into houses previously occupied older residents on his road. This suggests a growing number of young families being attracted to move to Bookham for the lifestyle benefits it brings.</p> <p>As a result of the above a different approach is needed for the future of Bookham. As the older generation downsize, more families will move in creating a population growth of middle to high income families who increasing rely upon:</p> <ul style="list-style-type: none"> • Transport links into London and other large centres (e.g Guildford and Epsom).

		<ul style="list-style-type: none"> • High St facilities, shops, restaurants, services etc. <p>Current public transport links are not very good. Whilst local transport issues have been recognised in the plan there is no clear plan for the wider implications and if we are to build more houses, these residents will require better public transport. Increased transport facilities for peak travel times should be considered. With redevelopment of Leatherhead Centre and the possibility of Crossrail 2 coming to Epsom this becomes a larger issue.</p> <p>The High St is key to the success, growth and character of Bookham. Larger units would enable new businesses to come to Bookham. Existing commercial units are often aged and too small to attract businesses.</p> <p>Disagrees with the statement that the transfer of usage from shopping to hot food takeaway will not be supported. Bookham lacks a variety of restaurants that are open in the evening and that are walking distance for village residents. Residents have to drive to Fetcham/leatherhead etc. There is a lack of places where families can support the village economy and providing both daytime and evening trade on the High St would add to its vitality.</p> <p>Congestion on the High Street needs to be addressed. Making the High Street one way and a local loop using East St could solve many of the issues. This could also allow the increase of pavement size along the High St making it safer for all, in particular the older residents. Another idea is to pedestrianise it.</p> <p>Bookham is changing and any NDP needs to recognise that the requirements across the community are evolving. Addressing the points above would help meet needs of an increased population of middle aged people and children.</p>
BKNDP38	Rosemary Osborne	<p>Supports the Bookham NDP.</p> <p>However no major decisions on housing and infrastructure should be taken for the Bookham until after the situation regarding the Howard of Effingham project has been finalised. Any development on the border of Effingham/Bookham will have a huge impact on the Bookham area in terms of housing, services and roads, and must be taken into account when considering future development of the</p>

		Bookham area.
BKNDP39	Den Flavell	<p>Appendix 12 – Drainage improvements</p> <p>Greenacres, Park Green and The Park</p> <p>Provides details of ongoing issue with flooding in the above area, between 2003 and the present (see BKNDP39 for details). The situation will continue to be monitored and progressed through to an eventual solution.</p>
BKNDP40	Peter and Gwen Restell	<p>Policy BKH1: Smaller homes for downsizing and new families</p> <p>Raises concerns the maximum areas prescribed for 2 and 3 bedroomed houses. There is no need to prescribe any maxima; it would be preferable either to prescribe minimum areas or none at all, leaving the market to dictate what is required. Older people used to living in relatively spacious family homes will not wish to downsize to cramped accommodation. If they do not move, those family homes will not become available for the younger generation, which would defeat the object of this policy.</p>
BKNDP41	Paul Gallard	<p>Flooding is a key issue in Bookham and for me in particular for the last two years. Since 3 and 5 Fox Lane were flooded (twice) the issue has been batted back and forth between MVDC, SCC and Thames Water and nothing has been done. Expresses frustration at lack of action.</p> <p>The Strategic Flood Risk Assessment (SFRA) 2012 identified the surface water flooding as the main flooding risk to Bookham. Most of the development in Bookham is infill and on sites capable of taking 10 houses or less. Therefore neither the EA nor SCC, as the Lead Local Flood Authority will have a role to play as the Statutory Consultee. Responsibility for dealing with flood risk and/or agreeing drainage arrangements rests solely with MVDC. Action is needed quickly, as a result of the NDP or independently of it.</p>
BKNDP42	Alec M Garnham	<p>Appendix 11</p> <p>Raises several specific highway issues that require review, in the following locations. See BKNDP42 for</p>

		<p>details.</p> <p>1: High Street, Church Road, Lower Road (Town Centre area), East Street (traffic flow on narrow roads, junction control, speed control measures and drainage)</p> <p>2: Lower Shott & Dorking Road (restore car park, realign corner)</p> <p>3: Dorking Road, Beales Road estate (control parking of large vehicles)</p> <p>4: Public Footpath/Access way connecting Dorking Road and Crabtree Lane via South End (maintenance issues).</p> <p>5: Dorking Road between Beales Road & Dawnay Road (road alignment, visibility and maintenance of kerbstones).</p>
BKNDP43	John & Sheila Morley	<p>Supports the Bookham NDP.</p> <p>Hopes that this will have been a worthwhile exercise and will not be over—ridden by central Government housing requirements.</p>
BKNDP44	Richard Osborne	<p>Supports the Bookham NDP.</p> <p>Raises concern about potential impact of proposals at Howard of Effingham School, which would have an enormously detrimental effect on Bookham’s already overloaded infrastructure and erode gap between Bookham and Effingham.</p>
BKNDP45	Philip Bond	<p>Reports and evidence affirm that the greatest danger of flooding for Bookham is surface water. Therefore any development should include effective mechanisms for dealing with the surface water resulting from any development.</p> <p>Due to the land being clay, soak always are ineffective, so plans should include other mechanisms for surface water that are confirmed as effective for the clay based land in Bookham.</p>

BKNDP46	Sarah Rowlands	The responsibility to address flooding and drainage need to be more clearly stated. Developers of new buildings generally link into the current drainage and this is not addressing the incapacity of the current drainage system.
BKNDP47	Angela Garland	<p>Generally supports the Bookham NDP.</p> <p>Policy BKIN2 and Appendix 12</p> <p>Expresses concerns about frequent flooding at junction of Lower Road and East Street, which have not been resolved despite attempts over the years.</p> <p>Lacks confidence that Mole Valley DC will obviate flood risk to the village. Flood risk needs to be addressed on every future development in Bookham, not just on those of ten houses or more. Developers need to be made clear about their responsibilities re surface water.</p>
BKNDP48	Mr & Mrs R Gill	<p>Notes need for smaller houses to meet local needs and the regret expressed that most new developments have been for larger houses.</p> <p>Policy BKH2: Infill and Garden Development</p> <p>Welcomes policy to respect layout and garden sizes of existing development and avoid cramped developments.</p> <p>Policy BKEN2: Trees and Hedgerows</p> <p>Welcomes policy to prevent premature felling of trees prior to planning applications being sought.</p> <p>Expresses concern about piecemeal infill development, which is stressful for existing residents. There should be more coordination in decisions when a series of separate applications is received.</p> <p>Seeks reassurance that decisions based on the BNDP will not be overridden at appeal, against the wishes of residents and the Council.</p>
BKNDP49	Grant Woodham	Policy BKEN2: Trees and Hedgerows

		<p>Trees are being lost in areas where houses are too close to mature trees, that are then felled by new occupiers. New developments should take mature trees into account and not be built too close.</p> <p>Criticism of Mole Valley DC's approach to serving TPOs. A review of new TPOs is needed, to include those that contribute to people's garden landscape.</p> <p>BKH1 : Smaller Homes for Downsizing and New Families</p> <p>Objects that the policy will harm the character of well established roads (specific roads listed – see BKNDP49). Smaller homes should only be built where this style of property already exists.</p> <p>BKEC3: Developing and Safeguarding other Retail Sites</p> <p>Beckley Parade is scruffy and would benefit from large scale redevelopment to provide an attractive shopping area with residential properties above and behind.</p> <p>The former Indian restaurant site (Taz, Guildford Road, Bookham, KT23 4HB) would also be better used for residential development. Planning permission should not have been refused on grounds of noise from the adjacent coach garage site.</p> <p>BKEC4: Safeguarding Land in Industrial and Commercial Use</p> <p>The Bookham industrial park causes disturbance to residents and MVDC has stated that it is poorly positioned. The site would be best used for residential development, including the Photo Me site.</p>
BKNDP50	John Howarth	<p>BKEC2</p> <p>Refers to comments made during pre-submission consultation (see BKNDP50 for details).</p> <p>Appendix 6 does not describe which, if any, of the 16 nominated local green spaces satisfy the tests in the NPPF. This omission tarnishes the credibility of the document.</p> <p>In the Consultation Statement, the comment to “Amend map to exclude stand of trees to east of the car</p>

		<p>park” should be ignored and the red zone in the map on page 23 should be extended to include Green Space No. 8 because of the omission of relevant evidence for its exclusion.</p>
BKNDP51	<p>David Cox OBE, Bookham Youth & Community Association Ltd</p>	<p>BKEN1: Local Green Spaces</p> <p>Comment re Lower Road Recreation Ground (Local Green Space 15):</p> <p>The protection from housing development is supported. However, the current plan prevents any improvement, expansion or redevelopment of the existing hall on the Lower Road Recreation Ground, which is used as a sports club. An amendment should be made to allow provision of a better community facility.</p> <p>One matter being considered is the replacement of the existing building with a modern community/sports facility when the current Bookham Youth & Community Centre at 164 Lower Road is no longer sustainable due to its age. Lower Road recreation ground is an ideal site to reinvest any proceeds from the sale of the current Youth & Community Centre, due to its location and existing facilities.</p>
BKNDP52	<p>P Shurville</p>	<p>Appendix 11 Highway Improvements</p> <p>Comments on proposals for Widening of Carriageway near Old Pound Cottage, Little Bookham Street. The narrow section of the road already slows traffic. Any land taken from front gardens on the east side of Little Bookham Street will make access even more difficult and hazardous. Shortened driveways will cause parking problems.</p>
BKNDP53	<p>Matthew Roe, RPS CgMs on behalf of Surrey County Council</p>	<p>BKEN1: Local Green Spaces</p> <p>Comments relate to the pavilion in the north east corner of Lower Road Recreation Ground. Site details and a location plan are provided.</p> <p>Objection to draft Policy BKEN1 which designates a large area as Local Green Space.</p> <p>Lower Road Recreation Ground has been added to the areas identified for designation as Local Green Space in the pre-submission version of the NDP.</p>

		<p>There is very limited evidence to support the policy and justify why the site is included in the designation. The draft policy conflicts with paragraph 14 of the NPPF.</p> <p>The designation is restrictive and extensive and does not account for existing built development on the sites. The policy should be revised to account for existing built development and the need to refurbish and redevelop buildings in future.</p> <p>Policy BKEN1 should not restrict opportunities for other uses, including but not exhaustive of education, social inclusion, community and charitable causes at the Lower Road Recreation Ground, in respect of development which may well enhance the community and bolster the open space.</p>
BKNDP54	Barry Reeve	<p>Seeks clarification about apparent conflict between Mole Valley Core Strategy Chapter 5 Policy CS1 which indicates an intention to undertake a Green Belt review and NDP page 8 which states that the Development Plan does not include changes to the Green Belt. Supports the retention of the Green Belt in its current form in accordance with the reported large majority of Bookham residents.</p>