



FARNHAM TOWN COUNCIL

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Annex I

Responses to the Pre-Submission Waverley Local Plan Part I: Strategic Policies and Sites

Farnham Town Council is pleased to see progress on the Waverley Local Plan and welcomes the step change it represents in the planning of the Borough and of Farnham being genuinely plan-led and moving away from the current appeal-led system. The Council recognises the significant endeavour on behalf of the Borough to produce the Plan and welcomes the supportive and collaborative approach that has been taken.

The Local Plan has been developed alongside Farnham Town Council's Neighbourhood Plan and shows significant synergy. The Town Council recognises the strategic significance of the Local Plan and is supportive of key policies such as the use of Dunsfold Park as a large strategic mixed-use site. The Town Council also welcomes the positive presumption within the Local Plan in favour of sustainable development and acknowledgement of the potentially negative impact of planned land-use on public health and environmental matters such as congestion and air pollution. It is of critical importance though that the Local Plan is fully aligned with the Farnham Neighbourhood Plan, particularly given the extensive evidence base and consultation supporting the Neighbourhood Plan (noting that Farnham Town Council is still awaiting promised evidence regarding the effectiveness of SANGS).

Because of the significance of the two plans Farnham has sought specialist technical advice to support its response to the Local Plan consultation. Having reviewed the Pre-Submission Waverley Local Plan Part I: Strategic Policies and Sites and accompanying evidence, the following commentary sets out the support for and requests for modification of relevant policies and paragraphs in the order of the Local Plan. The Town Council's requests for modification and proposed changes and for appearance at the oral part of the examination are as follows:

- Policy SP2: modification and appearance
- Paragraph 6.16: modification
- Policy ALH1: appearance
- Table 6.1: modification and appearance
- Policy ICS1: modification
- Policy EE1: modification
- Policy TCS1: modification
- Policy LRC1: modification
- Policy RE2: modification and appearance
- Policy RE3: modification and appearance
- Paragraphs 13.44 and 13.45: modification and appearance

- Policy SS1: modification and appearance
- Policy SS2: modification and appearance
- Policy SS3: modification and appearance

These are complex issues with potential significant impact on the Farnham Neighbourhood Plan and require participation of representatives of the Town Council. The detailed rationale and suggested modifications are set out further below along with details of areas that Farnham Town Council would specifically support.

Policy SP2: Spatial Strategy

The Policy is fundamental to the distribution of development within the Borough but can't be considered sound until justified and consistent with national policy.

In relation to consistency with national policy, criterion I refers to avoiding major development on land of the highest amenity value such as the Surrey Hills Area of Outstanding Natural Beauty. AONB's are not designated for their amenity value but their landscape and scenic beauty. In order to be consistent with the NPPF, this criterion should be reworded.

The NPPF also states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes (Para 109). In a Borough with a number of local landscape designations, a policy which seeks to direct development should also include reference to designated areas of local landscape value. In order to be the most appropriate strategy and consistent with the NPPF, criterion I should be reworded.

There is an important omission from Policy SP2 in relation to the significance of the Thames Basin Heaths SPA and its impact on the spatial strategy. The NPPF recognises such areas of restraint and retained South East Plan Policy NRM6 states that priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. The reasoned justification (Para 6.13) correctly refers to a number of factors which influence the location (and timing) of new housing including Special Protection Areas. In order to comply with the national framework and the retained regional policy, it is imperative that a further criterion be added to Policy SP2.

Finally, as currently worded the policy does not appear to be the most appropriate strategy. Dunsfold Aerodrome is as much of a focus for development as Farnham, Godalming, Haslemere and Cranleigh and is therefore more appropriately listed with these settlements rather than as an example of redevelopment of suitable brownfield sites under criterion 6.

Change(s) considered necessary to make the Local Plan sound

Reword Policy SP2 as follows:

Policy SP2: Spatial Strategy

To maintain Waverley's character whilst ensuring that development needs are met in a sustainable manner, the Spatial Strategy to 2032 is to:

I. avoid major development on land of the highest ~~amenity~~ *landscape* value, such as the Surrey Hills Area of Outstanding Natural Beauty *and other designated areas of local landscape value* and ~~to~~ safeguard the Green Belt;

- 2. *direct development to those areas where potential adverse effects to the Thames Basin Heaths SPA can be avoided without the need for mitigation measures;*
- 3. *focus development at the four main settlements³ (Farnham, Godalming, Haslemere and Cranleigh) and Dunsfold Aerodrome which is identified as a new settlement...*
- 6. *maximise opportunities for the redevelopment of suitable brownfield sites for housing, business or mixed use, including at Dunsfold Aerodrome which is identified as a new settlement. More details are given in Policy SS7;*

Paragraph 6.16

The Town Council requests modification of Para 6.16 to enable it to be considered sound, justified and consistent with national policy.

The paragraph does not refer to retained South East Plan Policy NRM6 which states that priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. In order to comply with the national framework and this policy, this paragraph must refer to retained South East Plan Policy NRM6 and its effect on the distribution of development.

Change(s) considered necessary to make the Local Plan sound

Reword Para 6.16

6.16 There is not enough suitable land for housing within existing settlements to meet the need for new homes in Waverley. Therefore, the Council’s strategy for housing delivery includes making selected releases of greenfield land around settlements to deliver around 2,300 dwellings. Most of this will be directed to Farnham and Cranleigh. Farnham is the largest of the main settlements but is close to the Thames Basin Heaths Special Protection Area (SPA). A key element of the Thames Basin Heaths Avoidance Strategy is *to direct development to those areas where potential adverse effects can be avoided without the need for mitigation measures* the provision of Suitable Alternative Natural Greenspace (SANG). Additional SANG capacity has been identified in order to deliver the new housing planned in the Farnham area. This issue is dealt with in Chapter 16.

Support Policy ALH1: The Amount and Location of Housing

Policy ALH1 is considered sound in respect of the amount of new housing planned for Farnham (2,330 dwellings).

This is considered as the maximum deliverable number of dwellings during the Plan period given the limitations of the SPAs and available SANG; landscape and Green Belt designations; protection against the coalescence of the distinct individual areas of Farnham and traffic congestion and associated air pollution. This provides the synergy with the Farnham Neighbourhood Plan which the Town and Borough Councils have sought.

Table 6.1 – Potential Housing Land Supply (as at April 2016)

Table 6.1 Row H sets out the amount of housing from suitable LAA sites, to deliver residue of 6,925 homes allocated to parishes in Policy ALH1. The source of this housing supply is the SHLAA, 2016 which details the various sources of supply that are expected to contribute to the delivery of the required housing.

The SHLAA states (Para 1.2) that the LAA identifies a future supply of land which is suitable, available and achievable for housing and other uses over the plan period covered by the Local Plan and provides evidence to support Table 6.1. It is also intended to provide evidence for Part 2 of the Local Plan, which will allocate non strategic sites and for neighbourhood plans produced by town and parish councils in Waverley.

It is recognised that the LAA does not in itself determine whether a site should be allocated for development, but the inclusion of sites as suitable within the LAA would appear to predetermine the principle of development either as an allocation of the site in a Local Plan Part 2 or in determining a planning application or appeal. The latter is of particular relevance in a borough where a 5 year housing land supply is disputed.

The NPPG states that developers, landowners, promoters, local communities, businesses, town and parish councils and others should be involved in plan preparation, including evidence on land availability. The NPPF states that there should be early and meaningful engagement and collaboration with neighbourhoods so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made (Para 155). However, evidence and policies of the Farnham Neighbourhood Plan have not been taken account of as the LAA contains sites considered to be suitable by the Borough Council which the Neighbourhood Plan considers unsuitable.

In the case of Farnham, Table 6.1 Row H is made up of sites which do not comply with the NPPF and/or the Neighbourhood Plan and for that reason are not suitable, available and achievable. The Table and consequently the housing land supply for Farnham as set out is therefore unsound.

Land at Hale Road (LAA Site 693)

In line with Para 109 of the NPPF, the LAA states that it takes into consideration proximity to local landscape designations such as a Historic Park or Garden. The LAA also states that information gained from evidence such as Landscape Reviews has been used to assess sites. The Waverley Borough Council Landscape Study – Part 1: Farnham & Cranleigh, 2014 identifies sites of high landscape value and sensitivity (now designated in the Farnham Neighbourhood Plan).

Nevertheless Land at Hale Road (LAA Site 693) adjoining Farnham Park (a Grade II listed Historic Park and Garden) and within an area of high landscape value and sensitivity is considered suitable by the Borough Council for development and is relied on to achieve sufficient dwellings in Farnham.

The site is not justified (based on the evidence base) and contradicts the NPPF, Local Plan and Neighbourhood Plan in respect of valued landscape designations and is therefore not sound.

Land rear of Three Stiles Road (LAA Site 727)

The LAA states that physical limitations such as access have been taken into account. The LAA states that a site is considered to be available when there is confidence that there are no legal or ownership problems and that the land is controlled by a developer/landowner. The NPPG does not consider sites without satisfactory access to be achievable. However, the LAA includes a site at Farnham without satisfactory access controlled by a developer/landowner being available to serve the site. For this reason the site is not considered achievable and is not sound as it is not effective (deliverable) or based on national guidance.

Land at Lower Weybourne Lane (LAA Site 25) and Land to the South of Monkton Lane (LAA Site 657)

The NPPF states that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. The Borough Council has adopted the Farnham Design Statement which sets out many of the locally distinctive characteristics in the area. The distinctive areas of the town have retained their individual characteristics. The Neighbourhood Plan also identifies key local characteristics and seeks to prevent coalescence of the distinctive parts of Farnham as well as between Farnham and Aldershot.

Development of 90 dwellings on land at Lower Weybourne Lane would fill the last remaining open space between Badshot Lea and Weybourne. By allowing the coalescence of the two areas, development would not respect the locally defined characteristic of separate distinctive areas. The site is not justified (the most appropriate strategy based on the evidence base) and contradicts the NPPF and Neighbourhood Plan in respect of defined characteristics of the area and are therefore not sound.

The LAA accepts that land to the South of Monkton Lane is not as well integrated with the settlement area as some of the other sites promoted around Farnham. The site lies in the gap between Hale and Central Farnham and would appear as an isolated development not well related to the distinctive character of either of the built up areas. Development of 56 dwellings on this site would not respect the locally defined characteristic of separate distinctive areas. The site is not justified (the most appropriate strategy based on the evidence base) and contradicts the NPPF and Neighbourhood Plan in respect of defined characteristics of the area and are therefore not sound.

Whilst achieving the proposed housing target set for Farnham, the Neighbourhood Plan does not promote any of the above sites. The sites can only be considered to be achievable if the Neighbourhood Plan policies are ignored.

West of Switchback Lane, Rowledge (LAA Site 546)

One of the core planning principles in the NPPF is to contribute to conserving and enhancing the natural environment (Para 17). The LAA states that physical limitations such as tree cover have been taken into account in assessing the suitability of sites. The Town Council consider the capacity of

land West of Switchback Lane, Rowledge, Farnham should take better account of the tree cover, stream and biodiversity of the site. For this reason, the Town Council objects to a capacity of 25 dwellings on this site.

Change(s) considered necessary to make the Local Plan sound

Delete Land at Hale Road (LAA Site 693); Land rear of Three Stiles Road (LAA Site 727); Land at Lower Weybourne Lane (LAA Site 25) and Land to the South of Monkton Lane (LAA Site 657) as suitable sites in the LAA capable of contributing to Table 6.1 Row H.

Amend the dwelling capacity of Land West of Switchback Lane, Rowledge (LAA Site 546) from 25 to 10 dwellings.

Support Paragraph 7.14

Paragraph 7.14 is sound as, based on evidence, it recognises that most of the major routes in and around Farnham are traffic 'hotspots'.

Policy ICSI: Infrastructure and Community Facilities

Policy ICSI is not sound as it is not positively prepared in seeking to meet objectively assessed infrastructure requirements.

The policy as worded seeks to prioritise the provision of SANG over other infrastructure needs. The unintended consequences of this policy may result in insufficient infrastructure (such as education or transport infrastructure – both critical in Farnham) available to serve a development. SANG should not be prioritised over other infrastructure which is equally essential to the sustainable growth of Farnham. If a range of infrastructure requirements, including SANG, cannot be met, applications should be refused.

The Local Plan is supported by an Infrastructure Delivery Plan ('IDP') which identifies the physical, social and green infrastructure needed to enable the amount of development proposed for the area.

The IDP lists infrastructure improvements expected to be delivered over the plan period at Farnham:

- Farnham Town Centre Transport Package: measures to –
 - Simplify the town centre road network to improve accessibility and journey time reliability for all modes of transport, reduce congestion, and improve air quality to address the AQMA 2017-2021
 - Reconfigure and reallocate road space and improve the public realm 2017-2021
- A31 Hickley's Corner: online interim capacity improvement 2017-2021
- A31 Shepherd & Flock roundabout - new signalling of give way approaches By 2032
- A325 Wrecclesham Hill / B3384 Echo Barn Lane – convert to mini-roundabout junction By 2032
- A31/A325 Coxbridge Roundabout: improvements By 2032
- A325 Wrecclesham High Street / School junction: signalisation By 2032

- Farnham railway station: single storey decked car park 2016-2020
- Farnham railway station: improvements to forecourt 2016-2020
- Improvements to strategic cycle network to include Weydon Lane (A31 crossing) and Shepherd & Flock roundabout 2016-2020
- A287 Firgrove Hill - pedestrian crossing near Red Lion Lane 2016-2020
- Pedestrian Crossing in Long Bridge 2016-2020
- Road safety improvements (A287) 2016-2020 –
 - Castle Hill/ Old Park Lane junction
 - Castle Street/The Borough junction
 - Firgrove Hill near Alfred Road
- Possible one Primary School form entry Plan period
- Up to four Secondary School forms of entry in addition to current plans Plan period
- Farnham Leisure Centre: additional showers, indoor soft play, climbing wall and improved reception By 2032
- Conservation and enhancement works at Museum of Farnham By 2032
- Upgrade of Farnham Memorial Ground By 2032
- Up to 6.3 ha of additional SANG (Thames Basin Heaths SPA Avoidance Strategy) Post 2026
- Farnham Park Environment habitat enhancement and creation. Annual

The IDP omits key projects identified in the Neighbourhood Plan

- Sustainable transport measures which assist walking, cycling and public transport including improved, sympathetically designed signage to link up the network of footpaths and other green spaces
- Restoration and re-creation of wildlife habitats within the Biodiversity Opportunity Areas
- An additional area for allotments of some 0.5 hectares
- Additional areas of sports pitches at Runfold and at Weydon Lane (Brambleton Park),
Improvements to specific open spaces
- Increased indoor sports facilities

Change(s) considered necessary to make the Local Plan sound

Reword Policy ICSI as follows:

Policy ICSI: Infrastructure and Community Facilities

1. Infrastructure considered necessary to support new development must be provided either on- or off-site or by the payment of financial contributions through planning obligations and/or the Community Infrastructure Levy.

2. On adoption of the Community Infrastructure Levy, a range of infrastructure requirements will need to be met, including in some cases the provision of SANG. ~~the provision of SANG will be prioritised as items of essential infrastructure to avoid the adverse impacts of development on the Thames Basin Heaths SPA and, where appropriate, the Wealden Heaths SPA.~~ If funding of these measures is not secured, development will be refused.

Reference should also be made to meeting the infrastructure requirements in made Neighbourhood Plans.

Support Policy AHN3: Housing Types and Size

Support Policy AHN3 as sound as it requires new housing to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA) as this would help support Policy FNPI5 (Small Scale Dwellings).

Policy EE1: New Economic Development

Support the allocation of Land off Water Lane, Farnham but believe the restriction to Use Classes B1a/b (Offices/Research and Development) floorspace is unsound as it is not consistent with the NPPF or the Farnham Neighbourhood Plan. It is also inconsistent with Local Plan Policy SS9 which allocated Land off Water Lane, Farnham, for Class B employment uses.

Change(s) considered necessary to make the Local Plan sound

Reword Policy EE1 as follows:

The provision of development for economic growth to meet the needs of the economy, including at least 16,000 sq m of new Class B business use ~~Use Classes B1a/b (Offices/Research and Development)~~ floorspace, will be delivered through:

a) The allocation of sites for additional employment floorspace:

- **On Land off Water Lane, Farnham in accordance with Policy SS9 of this Local Plan...**

Support Policy EE2: Protecting Existing Employment Sites

The Town Council considers Policy EE2 sound as it seeks to protect existing employment sites against alternative uses unless it can be clearly demonstrated that there is no reasonable prospect of the site being used for employment use.

Farnham Neighbourhood Plan designates the sites to be retained within the Farnham area.

Support Para 11.19

Support the recognition of Farnham Design Statement and Neighbourhood Plan as sound.

The Farnham Design Statement was adopted by the Borough Council in July 2010 and contains guidelines for any new developments within the Town Council area. This paragraph also recognises that Farnham Town Council is in the process of preparing a neighbourhood plan which may contain additional policies for its town centre.

Policy TCSI: Town Centres

Support the priority given to Town Centres but object to the omission of Farnham (or any other centres) from being named in the policy as unsound because the most appropriate strategy is insufficiently clear.

Change(s) considered necessary to make the Local Plan sound

Reword Policy TCSI to include specific reference to Farnham Town Centre.

Support Policy TCS3: Neighbourhood and Village Shops

Support Policy TCS3 as sound. It reinforces Neighbourhood Plan Policy FNP24 which defines the neighbourhood centres to be retained within Farnham.

Policy LRCI: Leisure, Recreation and Cultural Facilities

The Policy only seeks two types of public open space (play areas and sports pitches) rather than parks and gardens, allotments and amenity space.

Object to policy as unsound as it is not justified based on the available evidence. The NPPF states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities and that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required. The policy actually references taking account of the evidence in the Open Space, Sport, Leisure and Recreation (PPG17) Study 2012; the Waverley Playing Pitch Strategy March 2013; and the Waverley Play Area Strategy 2015 – 2024 but fails to seek parks and gardens, allotments and amenity space the need for which is established in the PPG17 Study.

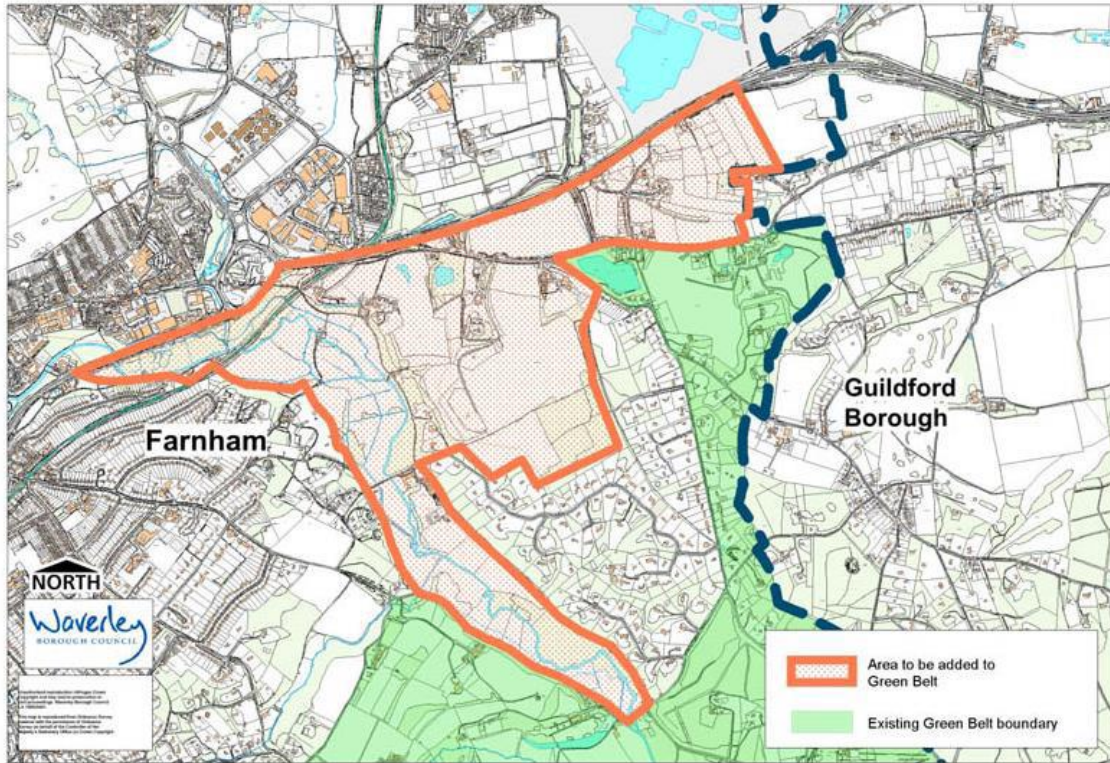
Change(s) considered necessary to make the Local Plan sound

Reword Policy LRCI to include specific reference to parks and gardens, allotments and amenity space.

Policy RE2: Green Belt

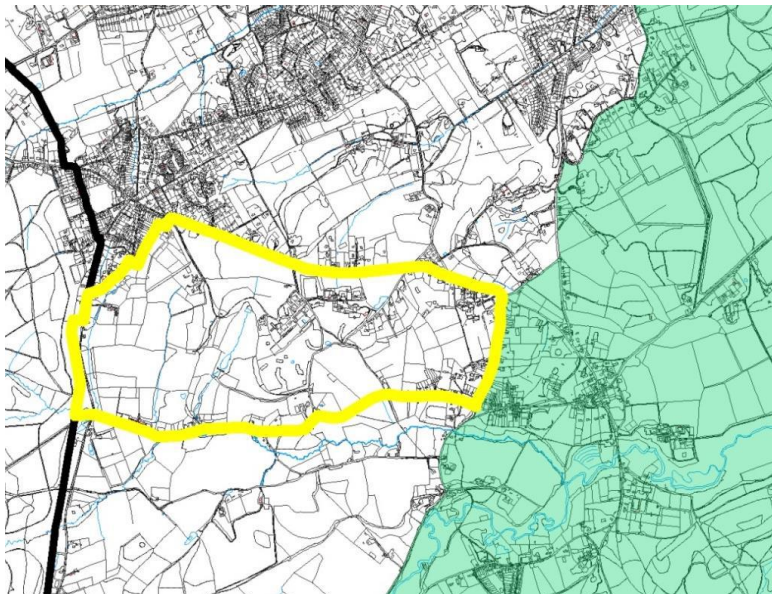
Support is given to designated addition Green Belt land to the north east of Farnham around Compton which is considered sound.

Plan 7 Area of Compton, Farnham to be added to the Green Belt



Object to the Borough Council omission of other areas from Green Belt designation as unsound as the omissions are not justified by the evidence available.

Land to the south of Rowledge (south of Long Lane)



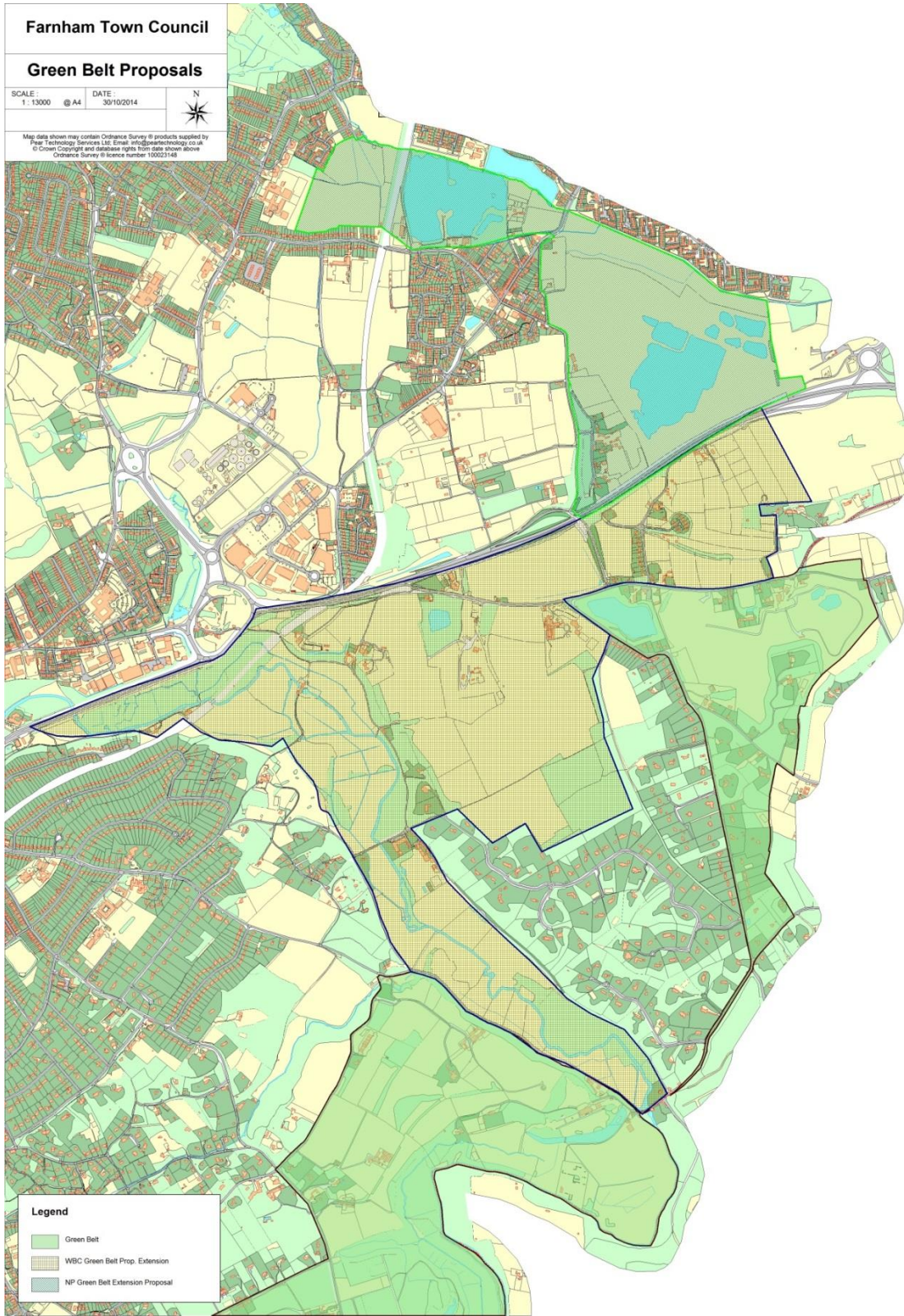
The overall conclusion is the Green Belt could be extended to take in land to the south of the Long Road. The specific segment of land identified in the study and shown in yellow on the map above runs southwards to West End Lane. However, the consultants also said that two further segments

(extending southwards to the Town Council boundary and including Dockenfield) could also be considered for inclusion in the Green Belt.

The Borough Council rejected the consultant's recommendation to include these areas on the grounds that the area is not currently under pressure. This is not one of the tests for considering whether land should be designated as Green Belt. Green Belts have to serve at least one of five purposes and the Borough Council's own consultants considered that this land did.

Land to the north east of Farnham around Badshot Lea

The Local Plan does not propose an extension of the Green Belt to the north of the A31 east and north of Badshot Lea to protect the gap with Aldershot. The Green Belt review's analysis focusses on the whole land around Badshot Lea but the Town Council considers that, within this substantial area, there is an area which performs all five purposes of the Green Belt (see Map below):



The area to the east and north of Badshot Lea shown on the map above performs all five purposes of the Green Belt (see Map below):

Check unrestricted sprawl of large built-up areas

The proposed area has a significant role in limiting the sprawl of both Farnham and Aldershot into the narrow gap which now separates these large built up areas. Designation as Green Belt would keep the land permanently open.

Prevent neighbouring towns merging into one another

The proposed area has a significant role in preventing the neighbouring towns of Farnham and Aldershot from merging into one another. Further development will narrow the gap between the towns and the designation as Green Belt would maintain the existing limited separation which now remains. Any further development in the narrow gap would cause the merging of the two towns.

Assist in safeguarding the countryside from encroachment

The proposed area would have a role in safeguarding the countryside from encroachment. The land is generally open in character comprising former gravel works and limited vegetation. The land has low landscape value but is considered sensitive to development particularly in the narrow gap with Aldershot and there are opportunities for enhancement of access. The A31 is not perceived as a significant separating boundary between the additional potential Green Belt land and the proposed Green Belt to the south. Designation should be made on the basis of whether the area as a whole fulfils Green Belt purposes.

Preserve the setting and special character of historic towns

Farnham is an historic town based originally around the castle, with medieval layout and later Georgian development. The proposed area forms part of the north eastern setting of the town and is prominent from the entrance to Farnham along the A31.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Within Farnham there are opportunities for town centre redevelopment, the regeneration of brownfield sites and other redevelopment and infill opportunities. The presence of the Green Belt helps to focus on such opportunities and making the best use of previously developed land.

Opportunities to plan positively for beneficial use

Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

There are significant opportunities in the proposed area for environmental enhancement of a landscape in poor condition with a degraded structure. There is an opportunity to provide access to the countryside and biodiversity improvements around the disused gravel site.

Strategic Planning

When defining boundaries, the NPPF states that local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development and satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.

The decision about Green Belt designation is part of the strategic planning of the area. Whilst there may be potential for some development at Badshot Lea, this should not be at the expense of preventing the unrestricted sprawl of Farnham and Aldershot or the merging of the two settlements. Plan 8 of the Local Plan references the need to protect the Farnham / Aldershot Strategic Gap.

The Green Belt Review does not propose an extension of the Green Belt to the north of the A31 east and north of Badshot Lea, although for the reasons set out above this extension is supported by Farnham Town Council. The proposal received significant support as part of the Regulation 14 Neighbourhood Plan consultation.

Change(s) considered necessary to make the Local Plan sound

Include land to the south of Rowledge (south of Long Lane) and land to the north east of Farnham around Badshot Lea within Green Belt Designation.

Policy RE3: Landscape Character

The Town Council is concerned that the landscape designations are not all justified by up to date evidence and therefore may be unsound.

Areas of Strategic Visual Importance are a local designation developed during the Local Plan Brief of 1981 and Local Plan 1984. They are considered in the Local Plan to play an important role in preventing the coalescence of settlements or because they are areas of open land that stretch into the urban area. They are considered to be 'strategic' because of the role they play in maintaining the urban character of towns such as Farnham. The Waverley Borough Council Local Landscape Designation Review, 2014, re-examined the areas designated around Farnham and concluded that not all met the criteria for designation. The continued designation of these areas around parts of Farnham therefore appear to conflict with the Designation Review. The designation also appears to be in conflict with the up to date planning status of some of the sites within the designated area. For example, planning consent has been granted for 120 dwellings on land at Crondall Lane and Land off Water Lane has been allocated in the Neighbourhood Plan and the emerging Local Plan as a business site allocation. For these reasons, the designation is not considered up to date and is not included in the Neighbourhood Plan. A more detailed review of the precise boundaries of the remaining ASVI areas will take place in Local Plan Part 2 to address any anomalies that have arisen since the original designation.

The County Council designated part of Surrey as an Area of Great Landscape Value (AGLV) in 1958 and 1971. Additional areas were designated in Waverley in 1984. The AGLV is a local designation which complements the AONB and the policies are combined in the adopted Local Plan. In some

areas the AGLV extends beyond the AONB to include areas of more local landscape importance including the countryside north and west of Farnham, The Waverley Borough Council Local Landscape Designation Review, 2014, did not re-examine the purpose or appropriateness of this designation or the areas designated. Whilst the boundary of the Surrey Hills Area of Outstanding Natural Beauty is being reviewed, the Neighbourhood Plan seeks to conserve and enhance the landscape and scenic beauty of those Areas of Great Landscape Value under consideration for designation as AONB.

Change(s) considered necessary to make the Local Plan sound

A more detailed review of the purpose and precise boundaries of the Borough's landscape designations is required at this stage to ensure that the Local Plan is justified by up to date evidence and consistent with the NPPF and landscape designations can be protected.

Paras 13.44 and 13.45 - Area of Historic Landscape Value and Policy RE3: Landscape Character

The paragraphs and policy refer to the historic landscape in Waverley which contributes to the distinctive character of the Borough and play an important part in maintaining the overall historic character of the area. There are two extensive areas of land in Waverley that are designated as Historic Landscapes: Farnham Park and Frensham Common. They are currently protected by saved Policy HE12 of the 2002 Local Plan.

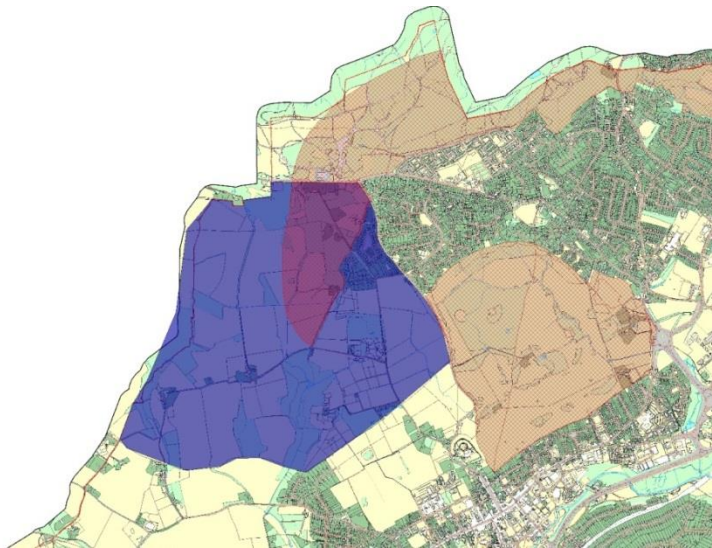
The paragraphs and policy are not considered sound as they are not the most appropriate strategy based on proportionate evidence and therefore are not justified. Farnham Town Council objects to the omission of Farnham Old Park, adjacent to Farnham Park.

The historic Farnham Old Park was located to the west of Folly Hill and has historic significance as the original Deer Park for the castle before the existing (new) Park. The origin of Old Park cannot be dated precisely but it is likely to have come about by 1138 when Bishop Henry of Blois built his castle. The hunting of deer provided for the Bishop's larder and King John, a great hunter, visited the castle no less than eighteen times. The park also provided timber, clay for pottery and tiles (from what is now Clay Pit Wood) and osier beds (west of Old Park Lane) providing osiers for the basket making industry at Crondall.

The landscape of Old Park still provides many reminders of its origin. The original boundary can mostly be traced today, generally marked by road (Folly Hill and Odiham Road – now the A287) or a continuous hedge (in some cases ancient species-rich hedgerows) often running alongside a stream or ditch. The northern and western boundaries (southern portion) are strongly wooded. Clay Pit Wood, and other copses around it, are designated Ancient Woodland and provide a strong landscape feature through the centre of the Old Park. Streams rise in the Old Park and flow south through the landscape bordered by woodland and hedgerows to the River Wey. Bridleways such as Old Park Lane and Middle Old Park and footpaths cross the former park with St Swithun's Way following the course of an ancient track way used for pilgrimages to Winchester bordered by an ancient hedgerow. The landscape comprises a patchwork of fields bounded by hedges and trees with swathes of dense woodland and is of high landscape sensitivity with the northern central wedge within the Old Park also being of high landscape value. (Waverley Borough Council Landscape Study – Part 1: Farnham & Cranleigh, 2014).

As well as contributing to an historic landscape, the ancient woodlands and hedgerows, copses and streams provide habitats for wildlife and form a strong central wildlife corridor through the landscape.

There has been a small incursion of residential development into this historic landscape west of Folly Hill along Old Park Lane/ Heathyfields Road. Nevertheless, the rural character of Old Park is characteristic of North West Farnham (Farnham Design Statement, 2010) and should be retained for its historic interest; its sensitive landscape; its contribution to the setting of the collection of Grade 1 and 2 listed buildings at the castle; its recreational value and biodiverse habitats. This area forms part of the adopted Local Plan's Area of Great Landscape Value. The Neighbourhood Plan designates the site of Old Park as having high landscape sensitivity and historic value.



Change(s) considered necessary to make the Local Plan sound

Include Old Park as part of the historic landscape of Farnham referred to in paragraphs 13.44 and 13.45 and Policy RE3.

Support Policy TDI: Townscape and Design

Support Policy TDI as sound as it seeks to ensure that the character and amenity of the Borough are protected by requiring new development to be of a high quality that responds to the distinctive local character of the area in which it is located by taking account of design guidance adopted by the Council including Conservation Area Appraisals and associated Management Plans and town design statements

Support Policy NE3: Thames Basin Heaths Special Protection Area

The policy, which repeats Policy FNPI2 of the Farnham Neighbourhood Plan, is supported as sound.

Policy SS1: Strategic Housing Site at Coxbridge Farm, Farnham
Land at Coxbridge Farm, Farnham, as identified on the Adopted Policies Map and on the plan below, is allocated for around 350 homes subject to a number of criteria being met.

Policy SS2: Strategic Housing Site at Land West of Green Lane, Farnham
Land to the west of Green Lane, Farnham, as identified on the Adopted Policies Map and on the plan below, is allocated for around 100 homes.

Policy SS3: Strategic Mixed Use Site at The Woolmead, Farnham
The Woolmead in Farnham Town Centre, as identified on the Adopted Policies Map and on the plan below, is allocated for a mix of uses including around 100 homes and 4,200 sq m of replacement retail floorspace.

The Town Council supports the allocation of these sites but does not consider the policies as sound as they are not consistent with national policy. The NPPF states that there should be early and meaningful engagement and collaboration with neighbourhoods so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made (Para 155). The NPPF considers neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The Neighbourhood Plan contains a number of additional criteria for the detailed design of these new housing allocations as envisaged by the NPPF.

Change(s) considered necessary to make the Local Plan sound

Amend Policies SS1; SS2 and SS3 with an additional Criteria:

Subject to meeting the criteria of Policy FNP14 of the Farnham Neighbourhood Plan