

Submitted Farnham Neighbourhood Plan

Proposed Amendments: SANG

At the request of the Examiner, the following factual updates to the submitted Farnham Neighbourhood Plan are proposed by Farnham Town Council. The updates have been agreed with Waverley Borough Council and Natural England. Additional text is shown as underlined italics and deleted text as ~~strike-through-text~~.

Planning Strategy (page 18 columns 2 and 3):

New housing development at Farnham ~~is restricted by~~ must take into account the Special Protection Areas (SPAs) at Thames Basin Heaths and Wealden Heaths which provide habitats for birds which are protected under the Birds and Habitats Directives. Adopted regional policy clearly 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 summary, this would mean that housing development should be directed away from Farnham. Nevertheless, the Plan has taken a pragmatic approach which recognises the broad regional policy but also seeks to meet some of the housing need locally. Even so, housing sites within the area between 400m and 5km of Thames Basin Heaths Special Protection Area (most of Farnham) must make provision for Suitable Alternative Natural Greenspace (SANG). SANG capacity is limited at Farnham Park and without provision of further capacity this limits the housing capacity at the town.

European Special Protection Areas (page 40 columns 2 and 3 and page 41 columns 1 and 2)

It is proposed to update SANG capacity in the light of recent monitored occupancy levels and proposed factual updates regarding housing capacity.

At current monitored levels of residential occupancy of 1.98 persons per dwelling Given these assumptions, the Waverley Borough Council SANG Topic Paper, August 2016, states that the unallocated (enhanced) SANG capacity was ~~1,370~~ 1,403 dwellings (at ~~31 March~~ 1 April 2016). This method of re-assessment has been verified by Natural England and represents a significant increase in the amount of SANG available at Farnham Park as an avoidance measure.

The table below indicates a projected SANG capacity requirement of 1217 dwellings resulting from the Neighbourhood Plan for housing not already taken into account at 1 April 2016.

<u>Source of Housing Supply</u>	<u>Net Dwellings</u>
<u>Further Reg 14 Neighbourhood Plan housing site allocation granted consent (Garden Style, Wrecclesham)</u>	<u>65</u>
<u>Windfall contribution</u>	<u>378¹</u>
<u>Housing Allocations</u>	<u>774²</u>
<u>Total</u>	<u>1217</u>

¹ In reality some of the windfall sites in Farnham will be located outside the SPA 5 km buffer zone and this number represents the maximum number of dwellings from this source requiring SANG.

² Amended Capacity of Allocation Sites (784 dwellings) minus Policy FNP14(g) West of Switchback Lane (10 dwellings) which will not rely on the capacity of the Farnham Park SANG as it is located outside the SPA 5 km buffer zone.

Policy FNP15 seeks the provision of smaller dwellings but clearly if the average occupancy of dwellings does rise in Farnham there is some tolerance in this capacity before additional SANG would be required.

The Neighbourhood Plan allocates land at Coxbridge Farm (Policy FNP14(i)) for approximately 350 dwellings. The site promoters have indicated that the effects of their development could be mitigated through the provision of 'bespoke' SANG, either on- or off-site. Other suitable sites may seek this option during the plan period and developers may offer their own bespoke solution to mitigate against any adverse effects on the Thames Basin Heaths SPA. Such mitigation measures will need to be agreed by Natural England.

The Borough Council undertook an assessment of potential opportunities for new SANG in the Farnham area (Analysis of Potential SANG Sites for Farnham for the Thames Basin Heaths SPA Avoidance and Mitigation Strategy, April 2015). This included potential SANG sites put forward as part of a Call for Sites exercise which accompanied the Regulation 14 Neighbourhood Plan.

In accordance with the Thames Basin Heaths Special Protection Area Avoidance Strategy, individual SANG sites should meet a number of criteria. For example, it should be possible to complete a circular walk of 2.3 – 2.5 km around the SANG. SANGs must be perceived as semi-natural spaces with little intrusion of artificial structures except in the immediate vicinity of car parks. For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use. All SANGs larger than 12ha must aim to provide a variety of habitats for users to experience. Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.

A total of 45 sites were assessed against the site quality criteria for an individual SANG and only part of the restored Farnham Quarry site was considered to be suitable and with good potential to be brought forward as strategic SANG. Following the site assessment in accordance with the SANG Site Quality Checklist, the site currently meets 4 out of 14 of the 'must/ should have' criteria and 3 out of 5 of the 'desirable' criteria. The site currently supports populations of wintering birds and is known to support numbers of ground nesting birds including nightingales which should not be disturbed by dog walkers. To ensure the protection of the site's nature conservation interests most of the site would be required to be fenced off with only 10.74ha of the 50ha site considered to be suitable for strategic SANG provision. Apart from matters relating to meeting the quality checklist requiring resolution, the availability and long-term management of the site would also have to be confirmed. The current owner is responsible for management of the restored site as part of the S106 Agreement for a 20 year period but one of the provisions for SANG is that it should be provided in perpetuity (80 years). If the site were to be confirmed it would add approximately 500 dwellings to potential SANG capacity. Other potential strategic SANG sites were found to be either longer term (post 2031) prospects or principally serving other towns. The Avoidance Strategy Review 2016 states that the Borough Council has commenced discussions with some of the landowners to determine whether their sites are suitable, available and, importantly, deliverable as SANG and the outcome of these discussions will be reflected in future reviews of the Avoidance Strategy.

[Relocated text] New residential development which is likely to have a significant adverse effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be based on the Thames Basin Heaths Special Protection Area Avoidance Strategy, 2016 and agreed with Natural England. In accordance with Policy NRM6, developments of fewer than 10 dwellings are not required to be within a specified distance of a SANG.

~~Whilst the Regulation 14 Neighbourhood Plan sought to provide on-site SANG to accompany larger greenfield housing site options, Natural England stated that the Neighbourhood Plan had not demonstrated that there would be sufficient and adequate SANG available for each allocation. In particular, they had concerns in relation to the size of the proposed SANGs, to meet the guidelines, including achieving a 2.3km walk, and assurances over the deliverability of sites in multiple ownership. For this reason, the Neighbourhood Plan does not seek on-site SANG and relies on the available strategic SANG capacity.~~

~~Other than Farnham Park, no suitable alternative strategic SANG site is therefore available to support additional housing in the period to 2031. This provides for a total dwelling capacity for Farnham during the Plan period of approximately 1,400 dwellings (31 March 2016).~~

The Wealden Heaths SPAs are less of a constraint because Natural England does not demand the level of mitigation required in relation to Thames Basin Heaths. In essence, this is because the overall development pressure is less, there is a wider choice of alternative space, and therefore the habitats themselves are less vulnerable. Nevertheless, certain developments, depending on size and distance, may impact the Wealden Heaths SPAs and therefore mitigation may be required. This will need to be assessed on a case by case basis. Where mitigation is deemed to be necessary, it will only be required for developments where mitigation has not already been provided for the Thames Basin Heaths SPA.

Policy FNP12 - Thames Basin Heaths Special Protection Area (SPA)

Whilst mitigation taking the form of provision of SANG was implicit in Policy FNP12, it is proposed to make explicit reference to bespoke SANG in the policy.

Within 400m of the SPA boundary, no net new residential development will be permitted, as mitigation measures are unlikely to be capable of protecting the integrity of the SPA.

New residential development which is likely to have a significant adverse effect on the SPA beyond 400m and within 5km of the SPA boundary (in a straight line) must provide:

i) appropriate contributions towards the provision of Suitable Alternative Natural Greenspace (SANG) at Farnham Park; ~~and~~ or

ii) a bespoke solution to provide adequate mitigation measures to avoid any potential adverse effects and

iii) a financial contribution towards wider Strategic Access Management and Monitoring (SAMM).

Such mitigation measures shall be agreed with Natural England and be provided prior to occupation of the development and in perpetuity.

Where mitigation takes the form of provision of SANG the following standards and arrangements will apply: A minimum of 8 hectares of SANG land (after discounting to account for any existing capacity) should be provided per 1,000 new occupants. The SANG should be readily accessed from, and well connected to, the development it serves including by sustainable modes of transport so that it is able to divert or intercept trips from the proposed housing development to the Thames Basin Heaths SPA.

Developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is in place to cater for the consequent increase in residents prior to occupation of the dwellings.

Housing Requirement (page 45 columns 1 and 2)

It is proposed to update SANG capacity in the light of recent monitored occupancy levels and proposed factual updates regarding housing capacity.

Other than Farnham Park which has a capacity to accommodate residents from approximately 1,400-1,370 dwellings (31 March 1 April 2016), no suitable alternative strategic SANG site is currently available to support additional housing in the period to 2031.

~~Even if development is not directed away from Farnham to avoid impact on the SPAs, the total identified dwelling capacity for the Farnham area (including within the 5km radius outside the Neighbourhood Plan area) is therefore approximately 1,400 dwellings (31 March 2016).~~

~~Making an allowance for windfall development and the Regulation 14 Neighbourhood Plan housing site allocation granted consent (Garden Style, Wreclesham) after 31 March 2016, Farnham has the capacity for approximately 960 additional dwellings within the limits of identified strategic SANG provision.~~

Summary (page 46 column 3)

It is proposed to update SANG capacity in the light of recent monitored occupancy levels and proposed factual updates regarding housing capacity.

At current occupancy rates (and even if these were to increase slightly), there is sufficient SANG capacity at Farnham Park to mitigate against the adverse effects of the housing projected to come forward as a result of the Neighbourhood Plan. Waverley Borough Council is monitoring the situation closely and is actively seeking further provision whilst bespoke SANG is also allowed should this be necessary.