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Report on Farnham Neighbourhood Development Plan 2013-2031

An Examination undertaken for Waverley Borough Council with the support of Farnham Town Council on the July 2016 Submission version of the Plan.

Independent Examiner: Derek A. Stebbing B.A. (Hons), Dip. E.P., MRTPI

Date of Report: 22 February 2017

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Main Findings - Executive Summary

From my Examination of the Submission version of the Farnham Neighbourhood Development Plan 2013-2031 and its supporting documents, including the representations made, I have concluded that subject to the recommended modifications I set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for Examination by a qualifying body – Farnham Town Council;
- the Plan has been prepared for an area properly designated – the Neighbourhood Plan area, the boundary of which is coterminous with the Town Council boundary as shown on the map on page 5 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2013 to 2031; and
- the policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the Referendum area should extend beyond the designated area to which the Plan relates and I have concluded that it should not.

1 Introduction and Background

Farnham Neighbourhood Development Plan 2013-2031

- 1.1 Farnham is an historic town in the south-west of Surrey, some 4 miles from Aldershot to the north-west (although the town boundary is less than 4 miles from Aldershot and almost abuts that settlement) and 11 miles from Guildford to the east. It has a population of 39,488 (2011 Census), with significant growth having occurred during the post-war period. It is the largest settlement within the Waverley Borough Council area. Farnham was one of the earliest planned medieval towns in the region and this is still evident from the street pattern in the town centre. The historic importance of Farnham and its buildings is recognised by some 360 listed buildings and the scheduled ancient monument of Farnham Castle.

- 1.2 The historic centre of Farnham is designated as a Conservation Area, and there are three smaller Conservation Areas within the Plan area at Great Austins, Wrecclesham and Old Church Lane.
- 1.3 The Surrey Hills Area of Outstanding Natural Beauty extends into the Plan area, to the south of The Bourne and Moor Park areas, whilst the whole of the Plan area is within the buffer zone of two European Special Protection Areas (SPAs), the Thames Basin Heaths and Wealden Heaths SPAs. There are a number of areas of high landscape value around the town and some important open green spaces, including Farnham Park and the Bishop's Meadows, which give the town an attractive and spacious setting.
- 1.4 Farnham has a thriving town centre with a strong and varied retail sector, which plays a major role in the local economy. There are over 30 hectares of employment land within and around the town, generally for Class B1 business units, which contributes to the provision of local employment opportunities.
- 1.5 There is good provision of community facilities, notably schools, within Farnham, and the University for the Creative Arts is located in the town. There is generally good access to open space for residents in Farnham, but there are certain potential shortfalls in natural/semi-natural greenspace, sports pitches, allotments and children's open space as the town grows.
- 1.6 There is high car ownership in Farnham, with 49.5% of households having access to two or more cars. However, 12.2% of households have no access to a car and there is continued reliance upon public transport. The road network, particularly in the town centre, suffers from congestion, which creates challenges for promoting public transport and safe pedestrian and cycling routes.
- 1.7 Beyond the urban area of Farnham, the Plan area includes a number of attractive smaller settlements including Badshot Lea, Frensham, Rowledge, Weybourne and Wrecclesham, each with a distinctive character and setting. There are some extensive areas of woodland, particularly in South Farnham, whilst other areas have a pattern of fields and paddocks with smaller areas of woodland.

The Independent Examiner

- 1.8 I have been appointed as the Examiner of the Farnham Neighbourhood Development Plan by Waverley Borough Council, with the agreement of the Farnham Town Council, who are the qualifying body for the purposes of this Examination.
- 1.9 I am a chartered town planner, with over 40 years of experience in planning, and have worked in both the public and private sectors. I have served on a Government working group considering measures to improve

the Local Plan system and I have also undertaken peer reviews on behalf of the Planning Advisory Service.

- 1.10 I am independent of the qualifying body and the local authority and do not have an interest in any of the land that may be affected by the Draft Plan. I therefore have the appropriate qualifications and experience to carry out this independent Examination.

The Scope of the Examination

- 1.11 As the Independent Examiner I am required to produce this report and recommend either:

- a) that the neighbourhood plan is submitted to a Referendum without changes; or
- b) that modifications are made and that the modified neighbourhood plan is submitted to a Referendum; or
- c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

- 1.12 The scope of the Examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The Examiner must consider:

- Whether the Plan meets the Basic Conditions;
- Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended).
These are:
 - it has been prepared and submitted for Examination by a qualifying body, for an area that has been properly designated by the Local Planning Authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;

- whether the Referendum boundary should be extended beyond the designated area, should the plan proceed to Referendum; and

- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 ('the 2012 Regulations').

1.13 I am not to consider any matter that does not fall within paragraph 8(1) other than the additional requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.14 The 'Basic Conditions' are set out in paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations; and
- Comply with prescribed conditions and prescribed matters.

1.15 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition. This requires that the neighbourhood plan should not be likely to have a significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European Offshore Marine Site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007) either alone or in combination with other plans or projects.

2 Approach to the Examination

Planning Policy Context

2.1 The Development Plan for Waverley Borough Council, not including documents relating to excluded minerals and waste development, is the Waverley Borough Local Plan (2002). At the time of writing this report, the Waverley Local Plan Part 1: Strategic Policies and Sites has been

submitted for Examination (on 21 December 2016), though as yet no hearing dates have been advertised.

- 2.2 The planning policy for England is set out principally in the 2012 National Planning Policy Framework (NPPF). In particular, it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the strategic development needs set out in Local Plans.
- 2.3 In 2014, the Government published Planning Practice Guidance (PPG) which offers guidance on how this policy approach should be implemented in neighbourhood plans. PPG makes clear that whilst a draft neighbourhood plan is not tested against the policies in an emerging Local Plan, the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. It cites, as an example, that up-to-date housing needs evidence is relevant to the question of whether the housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development¹. Paragraph 184 of the NPPF also provides, "The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider area". On this basis, I make reference to Waverley's emerging Local Plan in this report.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to this Examination, including those submitted which comprise:
- the Farnham Neighbourhood Plan – Submission Plan (2013-2031), dated July 2016;
 - the designated Neighbourhood Plan Area and accompanying designation map for Farnham, which was approved by Waverley Borough Council on 19 February, 2013 and which identifies the whole of the Farnham Town Council area as the area to which the proposed neighbourhood development plan relates;
 - the Consultation Statement, dated July 2016;
 - the Basic Conditions Statement, dated June 2016, explaining how the proposed neighbourhood development plan meets the Basic Conditions;

¹ PPG Reference ID:10-009-20160211.

- all the Representations that have been made in accordance with the Regulation 16 consultation undertaken between 19 August and 3 October, 2016; and
- the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) and accompanying Non-Technical Summary for the Neighbourhood Plan dated June 2016, together with the Habitats Regulation Assessment (HRA) Screening Document dated July 2016.

I have also considered all the evidence base documents that have been referenced by Farnham Town Council to support the preparation of the Plan, together with the written exchanges and other documents that have been submitted to me by various parties during the course of this Examination. This includes advice from Rupert Warren QC on behalf of Bewley Homes, Catesby Group and Wates Developments and a legal opinion from Paul Brown QC in respect of that submitted by Mr Warren.

- 2.5 These supplementary documents are available on the Farnham Town Council and Waverley Borough Council websites, as follows:

Farnham Town Council

<http://www.farnham.gov.uk/services/shapefarnham/regulation-16-supporting-documents/regulation-15-neighbourhood-plan-2016>

Waverley Borough Council

http://www.waverley.gov.uk/info/1004/planning_policy/1728/farnham_neighbourhood_development_plan

Site Visits

- 2.6 I have made unaccompanied site visits to the Neighbourhood Plan Area during November and December 2016 to familiarise myself with it and to visit relevant sites and areas affected by the policies and/or the subject of representations.

Written Representations or Public Hearing

- 2.7 Following my assessment of the Submission Plan and its accompanying documents, my site visits and consideration of the representations made during the Regulation 16 consultation period, I considered that a Public Hearing was necessary to ensure adequate examination of a number of issues that had arisen, and to receive oral submissions on those matters. Accordingly, with the kind assistance of Farnham Town Council, a Public Hearing was organised and held on 25 November, 2016 at the Council Offices, South Street, Farnham. Invitations were extended to those parties who I wished to hear from at the Hearing, together with a formal Agenda for the Hearing, Guidance and Directions for the conduct of the discussions and a Supplementary Note to the Agenda containing further details on the Matters and Issues that I wished to discuss. These

documents are also available on the Parish Council and Waverley Borough Council websites.

- 2.8 In combination, the discussions at the Public Hearing, the submissions that were then made to me and the written representations submitted at the Regulation 16 consultation stage, have in all cases provided me with sufficient information to enable me to reach a conclusion on the matters concerned.

Modifications

- 2.9 Where necessary, I have recommended Plan Modifications (PMs) in this report in order that it meets all the legal requirements. Within the body of the report, these are shown in **bold** type. For ease of reference, I have also listed these **PMs** separately in the Annex.

3 Procedural Compliance and Human Rights

- 3.1 I now consider the Plan's compliance with the relevant procedural requirements for the preparation of neighbourhood plans.

The Qualifying Body and Neighbourhood Plan Area

- 3.2 Farnham Town Council is the qualifying body able to lead the preparation of a neighbourhood plan. The Plan area is coterminous with the Farnham Town Council administrative boundary. Waverley Borough Council approved the designation of the area on 19 February, 2013. The Plan relates to this area and does not relate to more than one neighbourhood area, and it therefore complies with this requirement.

The Plan Period

- 3.3 A neighbourhood plan must specify the period during which it is to have effect. The Plan clearly states on page 7 and elsewhere in the document that the plan period is from 2013 to 2031. I note that the plan period of the emerging Waverley Local Plan is from 2013 to 2032, and I have considered those representations which advocate that the Neighbourhood Plan should be aligned in terms of its end date with the emerging Local Plan. Whilst the PPG points to the desirability of agreeing the relationship of the policies in a neighbourhood plan and an emerging local plan², it does not refer to the need for the alignment of the respective plan periods and I am not persuaded that there is a sufficient basis to recommend such a modification. In any event, there is a reasonable expectation that the neighbourhood plan will be reviewed before the plan period expires and in this context a difference of one year between the plans at the end of their respective plan periods does not seem significant. As such, I find that the Plan meets the necessary legal requirements on this matter.

² PPG Reference ID 41-009-20160211.

Excluded Development

- 3.4 From my review of all the documents before me, the Plan does not include policies or proposals that relate to any of the categories of excluded development³. Accordingly, the Plan meets the legal requirement.

Development and Use of Land

- 3.5 Policies in neighbourhood plans should only relate to the development and use of land. Where I consider that a policy or part of a policy is ambiguous or unclear in this regard I have, where practicable, made a modification to clarify how the policy relates to the use of land. Subject to these recommended modifications, this requirement is met.

Public Consultation

- 3.6 Public consultation must take place on the production of neighbourhood plans. The consultation processes should be open and accessible and any information presented should be easy to understand and to comment upon. It should enable all sections of the local community to have the ability to comment on and hence shape the policies which may affect where they live, work, visit or spend their leisure time.
- 3.7 In accordance with Regulation 15, Farnham Town Council has submitted a Consultation Statement to Waverley Borough Council. I have considered this statement as part of this Examination. It sets out the process by which the plan has been prepared, including the Regulation 14 statutory consultation taking into account the comments and views of residents, land owners, key stakeholders and other interested parties.
- 3.8 The preparation of the plan began in 2012 with a series of exploratory workshops during that year. Following designation of the Farnham Neighbourhood Plan area on 19 February, 2013, two developmental workshops were held in May 2013, followed by exhibitions and a survey in the Autumn of 2013. A further developmental workshop was held in November 2013. The Consultation Statement records the details of these events and the issues that were raised by participants and respondents.
- 3.9 The Draft Plan for the purposes of Regulation 14 was considered and approved by Farnham Town Council on 23 October 2014 and was published for public consultation between 31 October and 15 December, 2014. The consultation was also advertised on the Town Council's website and on various social media sites and a wide range of consultation events took place during this period, with over 4,500 people engaging in the consultation exercise.
- 3.10 The Consultation Statement and accompanying Appendices provides a comprehensive digest of the comments that were made during these Pre-

³ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.

Submission stages in the preparation of the Plan, together with a record of the meetings that were held with infrastructure providers, developers, commercial agents and Natural England.

- 3.11 I have reviewed the scale and extent of the consultation and engagement work that was undertaken during the preparation of the Plan. I am satisfied that the general approach was extensive and inclusive and that consultation events were organised and publicised to enable as many people as possible to attend, including 'hard to reach' groups within the community. Whilst it is not part of my Examination to consider the responses that were made by the Town Council during the preparatory stages of the Plan, I am satisfied that the Town Council has taken full account of the comments that were received and has amended the Plan, where necessary, to address those comments.
- 3.12 The completed Regulation 15 Neighbourhood Plan was considered and approved by Farnham Town Council on 21 July, 2016 and the Plan was submitted to Waverley Borough Council.
- 3.13 Following Submission of the Plan to Waverley Borough Council, formal consultation under Regulation 16 was held between 19 August and 3 October, 2016. A total of 202 representations were made during that period, and I have fully considered these representations as part of this Examination.
- 3.14 In summary, I consider that the public consultation and community engagement work that has been undertaken throughout the preparation of the plan has been open and transparent and conducted in a very thorough and comprehensive manner. I consider that it has enabled all residents, stakeholders, land owners and other interested parties to be able to comment upon the Draft Plan at the key stages in its preparation and also following its Submission to Waverley Borough Council. Accordingly, I conclude that the legal requirements for public consultation have been met satisfactorily.

Human Rights

- 3.15 None of the parties commenting on the Plan, have suggested that the plan breaches Human Rights (within the meaning of the Human Rights Act 1998) and I see no reason to disagree.

4 Compliance with the Basic Conditions

- 4.1 It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the 'Basic Conditions', as set out in paragraph 1.14 above. I have approached the assessment as follows:
- General Consideration of Compliance of the Plan, as a Whole;
 - Specific Issues of Compliance of the Plan's Policies:
 - Issue 1: The Farnham Built Up Area boundary;

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- Issue 2: The Housing Requirement and Potential Supply up to 2031;
- Issue 3: Suitable Alternative Natural Green Space (SANGS); and
- Issue 4: Detailed Plan Policy Points.

General Consideration of Compliance of the Plan, as a Whole

- 4.2 Sections 1 (Introduction), 2 (Farnham Now) and 3 (Farnham Future) of the Plan describe in general terms the aims and ambitions of the Plan, the context for its preparation and how it seeks to meet the Basic Conditions. Nothing in Sections 1 and 3 is, in my assessment, either controversial or likely to lead to a conclusion that the Plan fails to meet the Basic Conditions. These sections of the Plan are generally in the form of a narrative, supported by photographic images, drawings and a map of the designated area covered by the Plan. Section 4 (Neighbourhood Plan Strategy) sets out the broad strategy of the Plan, whilst Section 5 (Neighbourhood Plan Policies) contains the detailed policies of the Plan (Policies FNP1–FNP32), including site specific allocations. Section 6 (Monitoring and Review) sets out how the Plan will be monitored in accordance with its objectives, targets and policies.
- 4.3 The main focus of my Examination has been on the content of Sections 4 and 5 of the Plan, and it is those parts of the Plan which are the subject of the majority of representations made at the Regulation 16 consultation stage. However, consequent upon the consideration of matters that relate to the Basic Conditions that I have identified and those that have been raised by representations that are before me, I do recommend a series of modifications to the content of Sections 2, 4, 5 and 6 of the Plan, which are set out both in the body of this report and for convenient reference in the Annex.

Regard to National Policy and Advice

- 4.4 The main document setting out national policy is the NPPF. It explains that a presumption in favour of sustainable development will mean that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. The NPPF is also clear that neighbourhood plans should be aligned with the strategic policies of the Local Plan. They should not promote less development than is set out in the Local Plan or undermine its strategic policies. Neighbourhood plans should provide a practical framework within which decisions on planning applications can be made with predictability and efficiency.
- 4.5 Further guidance is set out in the PPG, published in 2014. PPG advises, inter alia, that policies should be clear and unambiguous and that they are concise, precise and supported by appropriate evidence which reflects and responds to the context and characteristics of the area⁴.

⁴ PPG Reference ID 41-041-20140306.

4.6 The Basic Conditions Statement sets out the key parts of the NPPF which have been taken into account during the preparation of the Plan. It notes how the Farnham Neighbourhood Plan has regard to the elements set out in the NPPF relevant to the designated area to deliver sustainable development, addressing the themes of:

- building a strong, competitive economy and supporting a prosperous rural economy;
- ensuring the vitality of town centres;
- promoting sustainable transport;
- delivering a wide choice of high quality homes;
- requiring good design;
- promoting healthy communities;
- meeting the challenge of climate change, flooding and coastal change;
- conserving and enhancing the natural environment; and
- conserving and enhancing the historic environment

4.7 I have considered the submissions made at the Public Hearing to the effect that the Plan is not compliant with extant national planning policy, in particular paragraph 47 of the NPPF, on the grounds that it does not meet the full Objectively Assessed Housing Need (OAHN) as set out in the emerging Waverley Local Plan. However, the PPG advises that a neighbourhood plan can be brought forward in advance of a Local Plan⁵ and furthermore there is no specific requirement in either the NPPF or PPG that the examination of a neighbourhood plan should consider whether it has been based upon a strategy to meet the OAHN⁶.

4.8 There are a number of more detailed points that do necessitate recommended modifications in order to have proper regard to national policy and guidance, which I address through modifications later in this report. Subject to these modifications, I consider that the Plan meets this Basic Condition.

Contribution to the Achievement of Sustainable Development

4.9 The Basic Conditions Statement (at Section 5) describes how the Plan contributes to the achievement of sustainable development. It notes that the Plan “contributes to the achievement of sustainable development by:

- planning positively for housing development to help meet the needs of present and future generations by identifying opportunities to meet housing need up to 2031;

⁵ PPG ID Ref: 41-009-20160211.

⁶ A helpful summary is provided in the ‘Crownhall Principles’. See Para 29 of the judgement in R (Crownhall Estates Ltd) v Chichester DC [2016] EWHC 73 (Admin)– Holgate J.

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- locating new development where it relates well to the existing town, incorporating sustainable transport links, and protects the high quality for business or tourist environmental assets of the Plan area;
- contributing to building a strong local economy and supporting the rural economy by allocating a new site for business use; supporting the retention, intensification and regeneration of the main clusters of business activities in Farnham; promoting an Enterprise and Incubation Hub at the University of the Creative Arts; focussing on the vitality of the town and neighbourhood centres and supporting the change of use or extension of rural building for business or tourist purposes;
- supporting the retention and enhancement of community and leisure facilities which are important to the social fabric of the town and the distinctive areas within it;
- protecting and enhancing the high quality natural, built and historic environment of Farnham and the surrounding countryside (including the integrity of the SPA) by ensuring SANG capacity to serve development; encouraging high quality development that responds to the distinctive character of Farnham and protecting and enhancing the area's public open space, biodiversity, landscape quality and historic assets; and
- securing the necessary social, physical and green infrastructure needed to support the proposed development, or the additional infrastructure identified in the Neighbourhood Plan which can be provided in a timely manner."

4.10 I have reviewed the Plan in this context. I note, in particular, that the Neighbourhood Plan Strategy set out in Section 4 of the Plan clearly has placed the presumption in favour of sustainable development at the heart of the Plan and its policies. Again, I do consider there is a need to make a number of detailed modifications to fully address this Basic Condition. Subject to those modifications which are set out later in this report, I consider the Plan will contribute to the achievement of sustainable development and that it has been prepared in order to meet that fundamental objective.

General Conformity with the Strategic Policies of the Development Plan

4.11 The development plan for the purposes of this examination is the adopted Waverley Local Plan, 2002 (for the period up to 2006), comprising the policies which have been saved. I note the Borough Council has raised no overriding concerns regarding the general conformity of the neighbourhood plan's policies with the strategic policies of the adopted plan. This is not surprising given the saved policies are aging and the emerging local plan for the area is now at examination stage.

4.12 The Basic Conditions Statement sets out how the Plan's policies have been assessed for their alignment with the emerging strategic Local Plan

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policies which have relevance to Farnham. The Borough Council comments that “the Neighbourhood Plan in many respects supports and reflects the emerging Waverley Local Plan, for example in terms of drawing on its evidence base and seeking to provide for the development needed in the town”.

- 4.13 Whilst it is not a statutory requirement for a Neighbourhood Plan to be in general conformity with the strategic policies of an emerging plan, in practical terms the alignment advised by the PPG will assist in preventing the plan from becoming quickly out of date. The PPG states, inter alia, that “where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging Local Plan and the adopted development plan with appropriate regard to national policy and guidance”⁷.
- 4.14 Subject to the recommended modifications that I set out later in the report on a number of detailed matters, I am satisfied that the Farnham Neighbourhood Plan is in general conformity with the strategic policies of the adopted plan and has been aligned with the emerging Waverley Borough Local Plan, at least up to that Plan’s pre-submission consultation stage (August-October 2016), in order for it to be as up to date as possible.

European Union (EU) Obligations

- 4.15 A neighbourhood plan must be compatible with European Union (EU) obligations, as incorporated into domestic law, in order to be legally compliant. A number of EU obligations may be of relevance including Directives 2001/42/EC (Strategic Environmental Assessment), 2011/92/EU (Environmental Impact Assessment), 92/43/EEC (Habitats), 2009/147/EC (Wild Birds), 2008/98/EC (Waste), 2008/50/EC (Air Quality) and 2000/60/EC (Water).

Strategic Environmental Assessment (SEA)

- 4.16 Directive 2001/42/EC, often referred to as the SEA Directive, relates to the assessment of the effects of certain plans and programmes on the environment, and is of relevance to this Plan. Similarly, Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, and Directive 2009/147/EC on the conservation of wild birds (referred to as the Habitats and Wild Birds Directives respectively) aim to

⁷ PPG Reference ID 41-009-20160211.

protect and improve Europe's most important habitats and species and can also be of relevance to neighbourhood plans.

- 4.17 Waverley Borough Council screened the Plan for the need for a SEA and in April 2016 issued a screening opinion that a SEA was required to be undertaken for the Plan. An SA/SEA Scoping Report had already been published in September 2014 outlining the main issues that needed to be considered when planning development in Farnham. This was followed by the publication of a SA/SEA alongside the Draft Plan at the Regulation 14 consultation stage (October 2014) and then by the final SA/SEA document at the Regulation 15 Submission stage (July 2016).
- 4.18 I have assessed the SA/SEA methodology and process by which the emerging Plan and its various policy options and site allocations were tested against a series of 12 sustainability objectives for Farnham. I am satisfied that the Plan was amended as necessary at each key stage in its preparation to reflect the outcomes of the SA/SEA process. In particular, I am satisfied that a realistic range of housing growth options, economic development options and spatial distribution options were fully tested through the process. The SA/SEA that has been submitted alongside the Plan identifies some significant cumulative positive impacts from the Plan's policies and proposals. Importantly, it states that "... as a whole, the policies of the Plan have no net negative impact". I accept those conclusions, and am satisfied that the Plan has been subject to a rigorous and comprehensive SA/SEA process during its preparation.

Habitats Regulations Assessment (HRA)

- 4.19 A HRA Screening Document for the Plan was published in July 2016 and has been the subject of consultation with the necessary statutory bodies, including Natural England, as required by legislation. There are eight Natura 2000 sites and one Ramsar site within 20 kilometres of Farnham. The Screening Document assesses the potential threats and pressures that would undermine the conservation objectives for each of those sites and concludes that no likely significant effects are expected upon any of the sites as a result of the Plan. I note that Natural England have raised no representations on this matter. I am satisfied that the relevant EU obligations under the Habitats Regulations have been met.
- 4.20 In summary, there are no issues arising that I consider incompatible with EU obligations, noting that I am also content that the specific and additional Basic Condition, prescribed in Regulation 32 of the 2012 Regulations, has been met.

Specific Issues of Compliance

4.21 There were three specific issues which were raised in representations to the Plan and which, in my view, necessitated a Public Hearing as part of this Examination. Those issues were the proposed Farnham Built Up Area Boundary, the housing requirement and potential housing supply up to 2031 within the Plan area and the provision of potential Suitable Alternative Natural Greenspace (SANG) within the Plan area. A number of representations and subsequent submissions to me suggested that the Plan did not have sufficient regard to national policy and was not sufficiently aligned with the strategic policies of the emerging Local Plan on matters connected to those three specific issues. I therefore address each of those issues in paragraphs 4.22-4.73 below along with a fourth issue, which deals with a number of detailed policy points.

Issue 1: Farnham Built Up Area Boundary

4.22 The Farnham Built Up Area Boundary (BUAB) is defined on Map A of the Plan on page 19. I consider the clarity and definition of this map at paragraph 4.47 below under the Detailed Points on the Plan. The Plan states that "A built-up area boundary is defined for Farnham which seeks to enable development opportunities within the town whilst protecting its rural setting and the surrounding countryside from inappropriate development. The BUAB is proposed to be extended around the allocated housing and business sites to indicate the acceptance of development of these areas". A variety of representations were made concerning the proposed BUAB, ranging from detailed site-specific concerns by individual residents and property owners to more general comments regarding the restrictive nature of the boundary in being able to accommodate planned growth in Farnham up to 2031.

4.23 I have considered all of these representations together with the discussions and submissions during the Public Hearing and I have reached the following conclusions. Firstly, there is no formal built up area defined for Farnham within the adopted Local Plan (2002). Rather the inner boundary of various countryside policies defines a "white" area extending from the inner edge of those policy areas which represents the then existing urban area of Farnham. I conclude that, in principle, it is appropriate for the Plan to seek to define a BUAB which represents the current built up settlement limits of Farnham. Secondly, I have studied the background document on the BUAB which forms part of the Plan's evidence base. It describes the six guiding principles that were applied to the assessment of the proposed boundary to ensure a consistent and comprehensive approach was taken. I am satisfied that the methodology described in the background paper is based on sound planning principles. With the passage of time since the Local Plan was adopted in 2002, it is inevitable, in my view, that the definition of a new BUAB for Farnham will

lead to some differences to the position that existed in 2002. I have carefully studied those parts of the BUAB where land is now included and those areas which are not within the proposed BUAB, having previously been with the urban area of Farnham as described above. In all cases, I consider that the proposed BUAB is appropriate and that the methodology for its definition in those areas has been applied on a consistent basis. Lastly, I conclude that the proposed BUAB is not the sole policy criterion by which proposals for new development will be judged, either within or beyond the urban area. The Plan together with the current adopted Local Plan and the emerging Local Plan each contain other policies against which to also measure the acceptability of new development.

- 4.24 My overall conclusion on this issue is that the proposed BUAB as defined in the Plan is appropriate, having regard to both national policy and advice and to the achievement of sustainable development. Therefore, I do not recommend any modifications to the proposed boundary.

Issue 2: The Housing Requirement and Potential Housing Supply Up To 2031

- 4.25 It is clear that Farnham is under significant pressure to accommodate further residential development and this is a matter which is being addressed by both the Neighbourhood Plan and the emerging Local Plan. Representations were made to the Plan that the housing requirement for Farnham is not being met and that additional housing sites be allocated; that the Plan does not have regard to national policy or align with the emerging Local Plan in terms of seeking to plan positively to meet housing need.
- 4.26 These were matters which I wished to discuss more fully at the Public Hearing and it was also clear from my consideration of the representations and my own assessment of housing policies, site allocations and data within the Plan that some of the Plan's content on housing was no longer accurate or up to date. Accordingly, I invited the Town Council and the Borough Council to prepare a Statement of Common Ground on matters where there appeared to be inaccurate data, discrepancies or other anomalies within the Plan in order to reach a baseline position of consensus between the two Councils on housing commitments, housing windfalls methodology, the housing capacity of the proposed allocation sites and other detailed matters regarding recent planning applications and planning permissions. This Statement of Common Ground was concluded on 10 November 2016 and this provided the basis for further discussions at the Public Hearing.
- 4.27 During the course of the Public Hearing and with the benefit of updated data on current planning applications and appeals, as at 11 November 2016, it was evident that further amendments would be required to ensure that the Plan contains accurate data on potential housing supply

and capacity within the Plan area. With the agreement of the Borough Council, revised data was published by the Town Council after the Public Hearing. I accept the accuracy of the revised data. In order to have regard to the PPG and the desirability of aligning the neighbourhood plan with the emerging local plan, I therefore recommend the following modifications to certain parts of the Plan’s text in order to set out the revised data and provide further explanation, as follows:

As a factual update, I recommend that on page 45, 2nd column – 4th paragraph should read: 794 dwellings (net) and page 46, 3rd column – 2nd paragraph should read: ...for the last 7 years of the Plan period 2024/25 – 2030/31)...

For clarification, I recommend that additional text be added on page 47 (3rd column), such that the 4th paragraph will read:

“The potential density of development proposed in this plan responds to the density of the surrounding development. An approximate housing capacity is included for each site. This is based on the approximate net additional dwellings to be achieved on these sites. Where available, planning permissions granted since 1 April 2016 have been used to inform site capacity”. (PM3)

1st and 2nd columns on page 54 – delete existing text, and replace with the following text:

“The total additional dwellings for the Plan period (2013–31) is therefore approximately 2,201 as set out below. Allocations and anticipated windfall contributions are within the remaining capacity of Farnham Park SANG. The total supply generally meets the emerging strategic provision for the Plan period of 2,214 dwellings”. (PM4)

To replace the current housing supply data, monitoring indicators and targets set out on page 54 of the Plan, I recommend the following modification:

<u>Source of Housing Supply</u>	<u>Net Dwellings</u>
Sites which have already been completed (in the period 2013/14 – 2015/16)	180
Large Sites with planning permission at 31 March 2016	695*
Further Reg 14 Neighbourhood Plan housing site allocation granted consent (Garden Style, Wrecclesham)	65

Small Sites with planning permission at 31 March 2016	99
Windfall contribution	378
Housing Allocations	784
Total	2,201

[*Includes Planning Permission Ref. WA/2015/2185 (2-3 The Borough 11 dwellings) and WA/2015/2389 (25-27 Hurlands Close - 10 dwellings) which had resolutions to permit but no decision notices issued as of 31/3/16].

<u>Monitoring Indicators</u>	<u>Targets</u>
Number of new dwellings delivered within the Neighbourhood Plan area during the Plan period (net)	2,201 new dwellings (net) over the Plan period
Number of new dwellings delivered on allocated housing sites within the Plan period (net)	At least 784 new dwellings on allocated housing sites
Number of new dwellings delivered on allocated housing sites within the Plan period (net).	At least 378 new dwellings on windfall sites"

(PM5)

- 4.28 I have given careful consideration to the implications of these changed circumstance upon the potential housing supply within the Plan area up to 2031. Whilst there is a potential reduction in housing supply from 2,262 new dwellings as shown on page 54 of the Plan to 2,201 dwellings, this amounts to a deficit of only 2.7% and I consider that, overall, this small reduction does not place the Plan in a situation where it fails to have regard to national policy and advice, or the strategic policies of the adopted and emerging Local Plans. Indeed, I am confident that, with the benefit of the detailed analysis that underpins the revised housing data set out in my recommended modifications, the Plan now benefits from presenting a more accurate projection of housing supply. There are constant ebbs and flows over time in the calculation of such statistics and this is a normal feature of planning for housing growth over a long period of time. I consider that the Plan contains robust mechanisms for monitoring housing supply in the years up to 2031 and if necessary, a formal review can be undertaken in response to any changed

circumstances, including the prospective adoption of the emerging Waverley Local Plan 2013-2032. I note the PPG provides helpful advice at ID Reference 41-084-20160519 to 41-086-20160519.

- 4.29 I turn now to consider the individual housing site allocations contained within Policy FNP14 of the Plan and which are numbered FNP14a)–FNP14 j). Firstly, I note that the proposed sites have all been confirmed as available by the landowners concerned and that a site selection process of seeking to accommodate new housing, as far as possible, on previously developed or “brownfield” land has been followed. This accords with national policy and is an important aspect of seeking to achieve sustainable patterns of development. I also note that other principles of national policy have been followed in identifying potential sites, including the protection of landscapes of high value and sensitivity, the protection of the Green Belt and the avoidance of flood risk. I am therefore satisfied that the proposed housing allocation sites all accord with the relevant national and local policy guidelines.
- 4.30 However, as with the housing supply data described above, it was evident from the representations received and my own analysis that some of the potential housing capacities and other content of certain proposed site allocations was no longer entirely accurate. I also invited the Town Council and the Borough Council to address this matter in their Statement of Common Ground, again to reach a baseline position of consensus between the two Councils on the estimated yields and other relevant information for each of the proposed allocations.
- 4.31 The discussions during the Public Hearing regarding each of the proposed allocations confirmed that a series of amendments are required to a number of the policy allocations, not least to correlate with the potential housing supply data. These amendments were agreed both during and subsequent to the Public Hearing, and were published by the Town Council. For ease of reference, I set out my recommended modifications in the following list in the sequence by which the proposed allocations are presented within Policy FNP14 in the Plan:

“FNP14 a) Part of SSE Farnham Depot, Lower Weybourne Lane and adjoining land – Approximate capacity 100 dwellings

FNP14 b) Land West of Green Lane, Badshot Lea - Approximate capacity 105 dwellings (in accordance with Planning Application Ref. WA/2015/2283)

FNP14 c) Land at Little Acres Nursery and south of Badshot Lea – Approximate capacity 125 dwellings

**FNP14 d) Land between Hale Road and Guildford Road –
Approximate capacity 10 dwellings**

**FNP14 e) Colemans Yard, Wrecclesham Road – Approximate
capacity 10 dwellings**

**FNP14 f) Coal Yard, The Street, Wrecclesham Hill – Approximate
capacity 9 dwellings (in accordance with Planning Permission Ref.
WA/2016/1264)**

**FNP14 g) West of Switchback Lane, Rowledge – Approximate
capacity 10 dwellings**

**FNP14 h) The Woolmead, East Street – Approximate capacity 51
dwellings (in accordance with Planning Permission
WA/2015/2387)**

**FNP14 i) Coxbridge Farm, West Street – Gross Area 12.36 hectares
– Approximate density 30 dph - Approximate capacity 350
dwellings**

**Design and layout – First sentence to be amended to read “The site
abuts a cluster of listed buildings in the southern corner and the
design and layout of development should preserve the special
architectural and historic interest of these buildings and their
setting”.**

**FNP14 j) Part of Farnham College (Tennis Courts)- Approximate
capacity 14 dwellings (in accordance with Planning Permission
Ref. WA/2014/2119)”**

(PM6)

- 4.32 I have also considered how the proposed housing allocations are shown cartographically within the Plan. They are presently shown collectively on Map I at Appendix 2 (page 88 of the Plan), and individually on pages 88a-88j. I consider that Map I lacks the necessary clarity and definition to accurately show the boundaries of the proposed allocations. I also consider that the individual inset maps could be improved to show the extent of the proposed allocations rather more clearly. The recommended modifications listed above will also require a boundary amendment to proposed allocation FNP14i), to exclude listed buildings, as discussed and agreed at the Public Hearing, to accord with the specific nature of the modification to that site allocation. **I therefore recommend that Map I and the accompanying inset maps should be redrawn to provide greater clarity to the boundaries and the extent of land covered by**

the proposed housing site allocations, including the revision to site FNP14i). (PM 7)

- 4.33 In reaching my conclusions and recommendations regarding the proposed housing site allocations in the Plan, I have given full and careful consideration to those representations which seek to make additional allocations of land for residential development in the Plan. They have included submissions that the Plan be either held in abeyance pending the Examination of the emerging Waverley Local Plan 2013-2032 or found to not satisfy the Basic Conditions. Such representations have generally been linked to other matters, including regard to national and local policy, housing need, housing supply, housing delivery and the extent of the BUAB for Farnham. In the majority of cases, I note that those parties proposing additional allocations of land and specific sites for housing in the Plan area have also made the appropriate submissions and representations to the Borough Council and in some cases, by the submission of planning applications. Having considered all of these matters, it is my assessment that they are essentially strategic issues which fall, quite properly, to be tested and considered at the Local Plan Examination.
- 4.34 As previously observed, it is the case that a neighbourhood plan can be prepared and adopted before or at the same time as an emerging Local Plan. Furthermore, the requirement of the Basic Conditions is that the neighbourhood plan “must be in general conformity with the strategic policies of the development plan for the area”. In this case, as noted above, the relevant development plan is the Waverley Local Plan, 2002, and specifically its saved policies. I am satisfied that the Farnham Neighbourhood Development Plan is in general conformity with that Plan (see paragraph 4.14 above). I am also satisfied that the Plan has been aligned with the emerging Waverley Borough Local Plan, at least up to that Plan’s Pre-Submission Consultation stage and that the Plan has taken account of the emerging strategic Local Plan policies regarding residential development as they affect Farnham. I conclude on this issue that the Plan is in general conformity with the existing strategic policies and is also well aligned with the emerging strategic policies of the development plan for the Farnham area and I therefore see no case to postpone or put this Examination in abeyance pending the future Examination of the Waverley Local Plan, 2013-2032. The strategic planning and housing issues that have been raised in representations to this Plan are all matters that fall within the purview of the Inspector appointed to Examine that Local Plan.
- 4.35 I note that the Plan is accurate as at the date of its submission (July 2016) with regard to its narrative regarding the emerging Waverley Local Plan, but the Local Plan has since been submitted for Examination (in December 2016). If this Plan proceeds to a Referendum and subsequent adoption, it may be necessary to point out in any accompanying literature

that the relevant date regarding the content of the Neighbourhood Plan for the purposes of this Examination is July 2016, i.e. the Submission date. I acknowledge that, if adopted, the Plan will have a later date, but that will only refer to its future date of publication.

Issue 3: Suitable Alternative Natural Greenspace (SANG)

- 4.36 The third policy issue which I wished to discuss in greater detail at the Public Hearing concerned the Plan's provisions for SANG capacity within the Plan area, arising from the designated SPAs at Thames Basin Heaths and Wealden Heaths. Farnham is within the buffer zone of these SPAs which has a direct relationship upon the projected capacity for new dwellings in the Plan area. The Borough Council undertook an assessment of potential opportunities for new SANG in the Farnham area in April 2015, including sites put forward as part of the Call for Sites undertaken during the preparation of the Neighbourhood Plan. However, in accordance with the Thames Basin Heaths Special Protection Area Avoidance Strategy Review 2016 (which was adopted by the Borough Council in July 2016) the strategic SANG capacity of Farnham Park can be increased during the Plan period. I do however note that some potential SANG capacity may come forward at part of the restored Farnham Quarry. I consider that this document provides a robust and up to date assessment of the unallocated (enhanced) SANG capacity in Farnham, and forms an appropriate basis upon which to assess potential avoidance measures. Under the Habitats Regulations, the Borough Council is the competent authority to consider whether applications for development are likely to have a significant effect on the SPA.
- 4.37 Policy FNP12 in the Plan provides the proposed policy framework for determining the mitigation measures that will be necessary, in the form of enhanced SANG capacity, that will be required for new residential development. Whilst the policy, as drafted, refers to the provision of SANG meeting certain criteria, it does not explicitly refer to the option for bespoke SANG capacity, either on-site or off-site, to be provided by developers as part of their development proposals. Following discussion at the Public Hearing, I consider that the policy should explicitly identify this option, which in my assessment could improve the opportunities for achieving new SANG capacity in the Farnham area and thus contribute to the achievement of sustainable development.
- 4.38 Following the Public Hearing, the Town Council and the Borough Council have put forward a series of amendments to the text of the Plan and to Policy FNP12 to update and clarify the content of the Plan with regard to the provision of additional SANG capacity. These amendments were published by the Town Council and have subsequently been agreed with Natural England, who raise no objections. I consider that these amendments fully accord with the SPA Avoidance Strategy Review and

following consideration of the comments made by other parties, I recommend the following modifications:

Page 18 – 2nd column, 3rd paragraph – amend 1st sentence to read “New housing development at Farnham 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”. (PM8)

Page 18 – 3rd column, 1st paragraph – amend final sentence to read “SANG capacity is limited at Farnham Park and without provision of further capacity this limits the housing capacity of the town”. (PM9)

Page 40 – 2nd column, 1st paragraph – delete final two sentences and replace with the following text:

“At current monitored levels of residential occupancy of 1.98 persons per dwelling, the Waverley Borough Council SANG Topic Paper, August 2016, states that the unallocated (enhanced) SANG capacity was 1,370 dwellings (at 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 1,217 dwellings resulting from the Neighbourhood Plan for housing not already taken into account at 1 April 2016.

<u>Source of Housing</u>	<u>Net Dwellings</u>
Further Reg 14 Neighbourhood Plan Housing site allocation granted consent (Garden Style, Wrecclesham)	65
Windfall contribution	378 (see Footnote 1)
Housing Allocations	774 (see Footnote 2)
Total	1,217

Footnotes

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.

Certain site promoters have indicated that the effects of their development could be mitigated through the provision of 'bespoke' SANG, either on-site 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." (PM10)

Page 41 – 1st column – delete first and second paragraphs. (PM11)

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

"Amend criterion i) and add new criterion ii) as follows:

- i) appropriate contributions towards the provision of Suitable Alternative Natural Greenspace (SANG) at Farnham Park; or**
- ii) a bespoke solution to provide adequate mitigation measures to avoid any potential adverse effects; and"** (PM12)

Page 45 – 1st column, 4th paragraph – amend to read as follows:

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

Page 45 – 2nd column - delete 1st paragraph (PM13)

Page 46 – 3rd column – delete text alongside Summary table, and replace with the following text:

"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." (PM14)

- 4.39 In conclusion on this issue, I consider that with the above-listed recommended modifications, this ensures that the Plan meets the Basic Conditions, adequately addresses the policy requirements for the provision of additional SANG capacity in the Farnham area and in particular the requirements of Natural England.

Issue 4: Detailed Plan Policy Points

- 4.40 The Borough Council have raised some detailed matters regarding the specific drafting of certain policies which relate primarily to the need to

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having regard to the NPPF and PPG and to the achievement of sustainable development. An overarching and recurrent issue is the need for clarity, noting the advice in this respect which is provided in the PPG⁸. I have taken into account the comments of Waverley Borough Council, together with other representations specifically concerning these policies in the Plan.

Policy FNP1 (Design of New Development and Conservation)

- 4.41 I do not recommend any modifications to the policy wording, but it relates in part to Map B (i) on page 21 of the Plan. I consider that this map is difficult to interpret, and therefore recommend as a modification that **Map B (i) should be improved by showing the titles of each of the four Conservation Areas on the map. (PM2)** As an informative, I also consider that the scale of this map could be enlarged to improve its legibility.

Policy FNP2 (Farnham Town Centre Conservation Area and its setting)

- 4.42 Waverley Borough Council consider that this policy does not have sufficient regard to the NPPF. I agree with that view, and consider that the policy should make specific reference to the potential impact of proposed new development upon heritage assets within the Conservation Area and its setting. I therefore recommend as a modification that a further clause be added to the policy, as follows:

“g) Does not lead to substantial harm to or total loss of significance of a designated heritage asset”. (PM15)

The recommended modification to Map B (i) (see paragraph 4.41 above) also applies to the interpretation of this policy.

Policy FNP3 (Shop Fronts within Farnham Town Centre Conservation Area and its setting)

- 4.43 I do not recommend any modifications to this policy, but the recommended modification to Map B (i) (see paragraph 4.41 above) also applies to the interpretation of this policy.

Policy FNP4 (Advertisements within Farnham Town Centre Conservation Area and its setting)

- 4.44 Waverley Borough Council make the point that this policy should apply to the whole of the Plan area, rather than just to Farnham Town Centre Conservation Area. I agree with that view, not least because the policy as currently drafted would not be applicable to the other three Conservation Areas within the Plan area and therefore does not have due regard to the

⁸ PPG Reference ID 41-041-20140306.

NPPF. I therefore recommend as a modification that the policy be redrafted as follows:

"POLICY FNP4 ADVERTISEMENT CONTROL

Within the Plan area, proposals for an advertisement will be permitted where:

- a) It would not be obtrusive in appearance, cause visual clutter or lead to a proliferation of signs, appear dominant or overbearing in the street scene, or cause significant harm to the appearance of any building on which it would be displayed because of its siting, size, design, construction or materials;**
- b) The level of illumination would cause no significant harm to residential amenity; and**
- c) It would not endanger highway or public safety." (PM16)**

Policies FNP5 (Great Austins Conservation Area and its setting), FNP6 (Wrecclesham Conservation Area and its setting) and FNP7 (Old Church Lane Conservation Area and its setting)

- 4.45 I do not recommend any modifications to these three policies, but the recommended modification to Map B (i) (see paragraph 4.41 above) also applies to the interpretation of each of these policies.

Policy FNP8 (South Farnham Arcadian Areas)

- 4.46 Waverley Borough Council support the aim of this policy, which seeks to protect the character of the low density residential areas in South Farnham with strong Arcadian characteristics, but consider that the policy could include a more positively expressed resistance to infill development. In my assessment, insensitive and poorly designed infill developments within the area could lead to a significant loss of character in this distinctive residential area. I therefore recommend as a modification that:

Clause c) of the policy as currently drafted be deleted, and be replaced with the following text:

"c) Demonstrates that the design, layout and siting of the proposal will not have any adverse effect upon the setting and amenities of adjoining residential properties and the wider residential character of the area." (PM17)

I further comment, as an informative, that Map C on page 32 of the Plan to which this policy relates, is difficult to interpret at its current scale and would benefit from being presented at a larger scale.

Policy FNP9 (Buildings and Structures of Character)

- 4.47 Waverley Borough Council suggest that this policy should be more closely aligned with the NPPF. I concur with that view, and I recommend as a modification that the policy be retitled "**Buildings of Local Merit (Undesignated Heritage Assets)**". (PM18)

Policy FNP10 (Protect and Enhance the Countryside)

- 4.48 I do not recommend any modifications to this policy, but the policy relates to Map A on page 19 of the Plan. I consider that this map is difficult to interpret and fails to show the Farnham Built Up Area Boundary with sufficient clarity and definition. I therefore recommend as a modification that **Map A should be redrawn to provide improved clarity and definition to the Farnham Built Up Area Boundary.** (PM1)

Policy FNP11 (Preventing Coalescence between Farnham and Aldershot; Badshot Lea and Weybourne; Rowledge and Wrecclesham; Rowledge and Boundstone; and Rowledge and Frensham)

- 4.49 There has been a significant number of representations concerning this policy, many in support but others objecting to the content of the policy. Waverley Borough Council do not object to the principles of the policy but note that it may hinder their ability to demonstrate the deliverability of otherwise suitable sites at the Local Plan Examination. I am satisfied that the policy has been developed following extensive consultation at the preparatory stages of the Neighbourhood Plan and that it reflects strong community support for a local policy to prevent coalescence between the various settlements across the Plan area and beyond. Nevertheless, it is the case that the nature of these gaps between settlements do vary. Some are narrow, whilst others are wider and the landscape characteristics of the areas also vary. It is difficult for a single policy to encompass all potential development possibilities across such a wide area and in my assessment, it would be possible in some situations for sustainable new development to be accommodated without compromising the fundamental objective of preventing coalescence between settlements.
- 4.50 The policy, as currently drafted, is I consider too restrictive and will not contribute to the achievement of sustainable development. It lacks sufficient flexibility to be able to address development proposals which could be demonstrated to be acceptable, when considered in the context of other policies of the Plan and the emerging Waverley Local Plan. The policy also suffers, in my view, by not being accompanied by a more detailed assessment in the Plan itself of the nature of the specific settlement gaps, against which it is to be implemented. As drafted, it applies to all areas outside the Farnham Built Up Area Boundary, as defined on Map A. I recommend that this map be redrawn to show improved clarity and definition to that boundary (see paragraph 4.41 above). However, I also consider that the policy itself requires some

amendment and I recommend as a modification, the following revision to the text of the policy:

POLICY FNP11

Delete current policy text, and replace with the following text:

“Development proposals outside the Built Up Area Boundary, as defined on Map A–Farnham Built Up Area Boundary, will be assessed in terms of their potential impact upon the visual setting and landscape features of the site and its surroundings, and the potential impact upon the biodiversity of the area and other relevant planning considerations, such as the impact of traffic and noise. Proposals which either fail to demonstrate that these impacts can be satisfactorily addressed or which clearly lead to the increased coalescence of settlements within the Plan area and beyond will not be supported”. (PM19)

A further modification is also recommended to the Monitoring Target for this policy (on page 39 of the Plan) by the addition of the words **“that increase coalescence” (PM20)** at the end of the current text.

Policy FNP12 (Thames Basin Heaths Special Protection Area)

- 4.51 This policy is considered in detail at paragraphs 4.36–4.39 of this report, together with my recommended modifications to the policy.

Policy FNP13 (Protect and Enhance Biodiversity)

- 4.52 For accuracy, clause a) of this policy should be amended, and I recommend as a modification that the text of clause a) be amended as follows:

“a) Protecting Special Protection Areas, Sites of Special Scientific Interest and Local Wildlife Sites (Sites of Nature Conservation Importance), protected and priority species, ancient woodland, veteran or aged trees, and species-rich hedgerows;” (PM21)

Policy FNP14 (Housing Site Allocations)

- 4.53 This policy, including the specific housing site allocations FNP14 a)-j) and the supporting text on pages 45-47 and 54 of the Plan, is considered in detail at paragraphs 4.25–4.35 of this report, together with my recommended modifications to the policy and to the supporting text.

Policy FNP15 (Small Scale Dwellings)

- 4.54 A modification is necessary to the text of this policy. I recommend that the text of the first paragraph be amended to read **“....will be encouraged...” (PM22)**. Table 2 (Farnham Housing Need), on page

55, also has two small errors, which should be corrected. Accordingly, I recommend as a modification that the 4th column of the table be headed "**3 Bedroom**" and that the final column of the table be headed "**4+ Bedroom**". (PM23)

Policy FNP16 (Building Extensions Within and Outside the Built Up Area Boundary)

4.55 I do not recommend any modifications to this policy

Policy FNP17 (Land for Business)

4.56 I do not recommend any modifications to this policy. However, I note that the policy refers to business sites as defined on Map J at Appendix 3. I comment that Appendix 3 does not presently contain a map headed Map J, and that it contains a series of inset maps, each with an EM notation. As an informative, I suggest that the inset maps be revised to remove the EM notations, and that a map headed Map J be included in Appendix 3 to provide a more appropriate cross-reference to the text of the policy. I further comment, as an informative, that the site areas are missing from inset maps r), s) and t) and they should be added.

Policy FNP18 (Business Site Allocation – Land at Water Lane)

4.57 One modification is necessary to the text of this policy. I recommend that **the word "on" before "B3208" be deleted (PM24)** in the final paragraph of the policy.

Policy FNP19 (Enterprise and Incubation Hub at the University of the Creative Arts)

4.58 I do not recommend any modifications to this policy.

Policy FNP20 (Rural Buildings for Business and Tourist Uses)

4.59 I do not recommend any modifications to this policy.

Policy FNP21 (East Street, South Street and Dogflud Way)

4.60 One modification is necessary to the text of this policy. I recommend that **the words "as defined on" before "Map M" be deleted (PM25)** in the first paragraph of the policy.

Policy FNP22 (The Woolmead)

4.61 I do not recommend any modifications to this policy.

Policy FNP23 (Farnham Town Centre)

- 4.62 As presently drafted, it is my view that this policy does not give sufficient encouragement and flexibility to potential mixed-use schemes within Farnham Town Centre, and does not fully reflect the policy intention of the NPPF to ensure the vitality of town centres. Accordingly, I recommend as a modification that the text of the policy be amended as follows:

Policy FNP23

Amend first paragraph to read:

“Within the town centre, as defined on Map L, proposals including Use Classes A1-A5, B1, C1 and D1 will be permitted, where the proposal”

Amend clause a) to read:

“a) non-A1 uses becoming the dominant ground floor uses within West Street, Downing Street and The Borough”. (PM26)

Policy FNP24 (Neighbourhood Centres)

- 4.63 I do not recommend any modifications to this policy. However, I comment as an informative that Map O at Appendix 4 to which this policy relates, would benefit from adding the names of the Neighbourhood Centres on the map.

Policy FNP25 (Public Houses)

- 4.64 I do not recommend any modifications to this policy.

Policy FNP 26 (Sports Pitches)

- 4.65 This policy refers to the potential allocation of new sports pitches at Weydon Lane (Brambleton Park), as shown on Map P and “within the broad location at Runfold, as shown on Map Q”. This relates to the Runfold Quarry site, which is presently the subject of ongoing land restoration following mineral extraction. The intention of this policy is to meet an identified shortfall in sports pitches within the Plan area. However, having regard to the NPPF and the achievement of sustainable development, I consider that both sites, and particularly the site at Runfold Quarry, have the potential to provide other outdoor sports and greenspace uses within the areas as defined on Maps P and Q. I therefore recommend as a modification that the policy be amended as follows:

POLICY FNP26 – to be retitled “Sites for New Outdoor Sports Facilities and Other Greenspace Uses”

Amend text of policy to read:

“Land at Weydon Lane (Brambleton Park), as shown on Map P, and at the Runfold South Quarry Site, as shown on Map Q, is allocated for new outdoor sports facilities and other appropriate greenspace uses, including new sports pitches, associated changing rooms and supplementary landscaping, subject to environmental and land restoration considerations”. (PM27)

Policy FNP27 (Public Open Space)

- 4.66 I do not recommend any modifications to this policy. However, following representations by Surrey County Council, I consider that the notation on Map H (Green Infrastructure) (on page 43 of the Plan) of a Public Open Space designation (at Weydon School, Heath End School, All Hallows School, Frensham Heights School, Hale Primary School, William Cobbett Primary School and Weybourne Infant School) should be removed as these facilities are not available for the public to access at any time. Accordingly, I recommend the following modification to Map H:

Map H (page 43) – delete the “Outdoor Sports notation” from Surrey County Council school playing field sites at Weydon School, Heath End School, All Hallows School, Frensham Heights School, Hale Primary School, William Cobbett Primary School and Weybourne Infant School. (PM28)

Policy FNP28 (Indoor Sports Facilities)

- 4.67 I do not recommend any modifications to this policy.

Policy FNP29 (Protection of Cultural Facilities and Community Buildings)

- 4.68 I do not recommend any modifications to this policy.

Policy FNP30 (Transport Impact of Development)

- 4.69 A number of modifications are necessary to the text of this policy to improve its clarity. I therefore recommend the following modifications:

Clause a) to read “Safely located vehicular and pedestrian access where adequate visibility exists or could be created;”

Clause c) to read “Residential development proposals ensure that sustainable transport links, including walking and cycling links, are provided to” (and then as existing text).

Clause d) to read “Employment and other non-residential development proposals located outside the town centre ensure that sustainable transport links are provided to” (and then as existing text). (PM29)

- 4.70 A further modification is needed to the Monitoring Targets for this policy. The first target should be amended to read **“No increase in the number of injury accidents reported in the Neighbourhood Plan area” (PM30)**

Policy FNP31 (Water and Sewerage Infrastructure Capacity)

- 4.71 I do not recommend any modifications to this policy.

Policy FNP32 (Securing Infrastructure)

- 4.72 I do not recommend any modifications to this policy

- 4.73 A number of other errors and omissions need to be corrected at various places in the Plan, in order to ensure accuracy. I therefore recommend the correction of these matters as a single modification, as follows:

Page 11 – 2nd column – “Biological Action Plan (BAP) species” should read **“Biodiversity Action Plan (BAP) priority species”**.

Page 17 – 1st column – “Wey Landscape Project” should read **“Wey Landscape Partnership”**.

Page 42 – 1st column – “rare ash wetland habitat” should read **“rare alder wet woodland habitat”**.

Page 42 – 1st column – **delete the words “(but only just)”**. (PM31)

5 Conclusions

Summary

- 5.1 The Farnham Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My Examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. It has focused on the main issues set out and described in Section 4 of this report, and during my assessment I have had regard to all the representations that were made during the Regulation 16 consultation stage, the discussions and submissions made during the Public Hearing held on 25 November, 2016 and to the documents and evidence submitted as part of the Submission of the Plan.
- 5.2 I have made recommendations to modify a number of policies and supporting text. Subject to these modifications, I consider that that the Farnham Neighbourhood Plan meets the Basic Conditions and the other legal requirements.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the plan relates. The Farnham Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend beyond the plan boundary.
- 5.4 I therefore consider that the boundary for the purposes of a future referendum on the Farnham Neighbourhood Development Plan shall be the boundary of the designated Neighbourhood Plan area for the plan, as approved by Waverley Borough Council on 19 February, 2013.
- 5.5 Accordingly, I therefore recommend to Waverley Borough Council that, subject to the modifications proposed in this report, the Farnham Neighbourhood Development Plan can proceed to a referendum.
- 5.6 It is evident from my Examination that a substantial amount of time and effort has been committed to the development and production of this plan by many people in Farnham and I commend all those involved. It should provide a robust planning framework for addressing future planning and change in the Plan area over the coming years.

Derek Stebbing

Derek Stebbing
Examiner

Annex: Modifications

Proposed modification number (PM)	Page no./ other reference	Modifications
PM1	19	Map A should be redrawn to provide improved clarity and definition to the Farnham Built Up Area Boundary.
PM2	21	Map B (i) should be improved by showing the titles of each of the four Conservation Areas on the map.
PM3	47	3rd column - 4th paragraph to read: "The potential density of development proposed in this plan responds to the density of the surrounding development. An approximate housing capacity is included for each site. This is based on the approximate net additional dwellings to be achieved on these sites. Where available, planning permissions granted since 1 April 2016 have been used to inform site capacity".
PM4	54	1 st and 2 nd columns – delete existing text, and replace with the following text: "The total additional dwellings for the Plan period (2013–31) is therefore approximately 2,201 as set out below. Allocations and anticipated windfall contributions are within the remaining capacity of Farnham Park SANG. The total supply generally meets the emerging strategic provision for the Plan period of 2,214 dwellings".
PM5	54	Replace existing Housing Supply data, Monitoring Indicators and Targets with the following: "Source of Housing Supply Net Dwellings Sites which have already been completed (in the period 2013/14–2015/16) 180

		<p>Large Sites with planning permission at 31 March 2016 695*</p> <p>Further Reg 14 Neighbourhood Plan housing site allocation granted consent (Garden Style, Wrecclesham) 65</p> <p>Small Sites with planning permission at 31 March 2016 99</p> <p>Windfall contribution 378</p> <p>Housing Allocations 784</p> <p>Total 2,201</p> <p>[*Includes Planning Permission Ref. WA/2015/2185 (2-3 The Borough 11 dwellings) and WA/2015/2389 (25-27 Hurlands Close - 10 dwellings) which had resolutions to permit but no decision notices issued as of 31/3/16].</p> <p>“Monitoring Indicators <u>Targets</u></p> <p>Number of new dwellings delivered within the Neighbourhood Plan area during the Plan period (net) 2,201 new dwellings (net) over the Plan period</p> <p>Number of new dwellings delivered on allocated housing sites within the Plan period (net) At least 784 new dwellings on allocated housing sites</p> <p>Number of new dwellings delivered on allocated housing sites within the Plan period (net) At least 378 new dwellings on windfall sites”</p>
PM6	48-53	<p>Make the following amendments to the text of the proposed housing site allocations within Policy FNP14:</p> <p>“FNP14 a) Part of SSE Farnham Depot, Lower Weybourne Lane and adjoining</p>

		<p>land – Approximate capacity 100 dwellings</p> <p>FNP14 b) Land West of Green Lane, Badshot Lea - Approximate capacity 105 dwellings (in accordance with Planning Application Ref. WA/2015/2283)</p> <p>FNP14 c) Land at Little Acres Nursery and south of Badshot Lea – Approximate capacity 125 dwellings</p> <p>FNP14 d) Land between Hale Road and Guildford Road – Approximate capacity 10 dwellings</p> <p>FNP14 e) Colemans Yard, Wrecclisham Road – Approximate capacity 10 dwellings</p> <p>FNP14 f) Coal Yard, The Street, Wrecclisham Hill – Approximate capacity 9 dwellings (in accordance with Planning Permission Ref. WA/2016/1264)</p> <p>FNP14 g) West of Switchback Lane, Rowledge – Approximate capacity 10 dwellings</p> <p>FNP14 h) The Woolmead, East Street – Approximate capacity 51 dwellings (in accordance with Planning Permission WA/2015/2387)</p> <p>FNP14 i) Coxbridge Farm, West Street – Gross Area 12.36 hectares – Approximate density 30 dph - Approximate capacity 350 dwellings</p> <p>Design and layout – First sentence to be amended to read “The site abuts a cluster of listed buildings in the southern corner and the design and layout of development should preserve the special architectural and historic interest of these buildings and their setting”</p> <p>FNP14 j) Part of Farnham College (Tennis Courts)- Approximate capacity 14 dwellings (in accordance with Planning Permission Ref. WA/2014/2119)”</p>
PM7	88 and 88a-88j	Map I and the accompanying inset maps be redrawn to provide greater clarity to the boundaries and the extent of land covered by the

		proposed housing site allocations, including the revision to site FNP14i).				
PM8	18	<p>2nd column - 3rd paragraph</p> <p>Amend 1st sentence to read:</p> <p>“New housing development at Farnham 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”.</p>				
PM9	18	<p>3rd column - 1st paragraph</p> <p>Amend final sentence to read:</p> <p>“SANG capacity is limited at Farnham Park and without provision of further capacity this limits the housing capacity of the town”.</p>				
PM10	40	<p>2nd column - 1st paragraph</p> <p>Delete final sentence and replace with the following text:</p> <p>“ At current monitored levels of residential occupancy of 1.98 persons per dwelling, the Waverley Borough Council SANG Topic Paper, August 2016, states that the unallocated (enhanced) SANG capacity was 1,370 dwellings (at 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 1,217 dwellings resulting from the Neighbourhood Plan for housing not already taken into account at 1 April 2016.</p> <table border="0"> <tr> <td><u>Source of Housing</u></td> <td><u>Net Dwellings</u></td> </tr> <tr> <td>Further Reg 14 Neighbourhood Plan Housing site allocation granted consent (Garden Style, Wrecclesham)</td> <td>65</td> </tr> </table>	<u>Source of Housing</u>	<u>Net Dwellings</u>	Further Reg 14 Neighbourhood Plan Housing site allocation granted consent (Garden Style, Wrecclesham)	65
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		<p>Windfall contribution 378 (see Footnote 1)</p> <p>Housing Allocations 774 (see Footnote 2)</p> <p>Total 1,217</p> <p><u>Footnotes</u></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Certain site promoters have indicated that the effects of their development could be mitigated through the provision of 'bespoke' SANG, either on-site 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."</p>
PM11	41	1st column – delete first and second paragraphs.
PM12	41	<p>Policy FNP12 (Thames Basin Heaths Special Protection Area (SPA))</p> <p>Amend criterion i) and add new criterion ii) as follows:</p> <p>i) "appropriate contributions towards the provision of Suitable Alternative Natural Greenspace (SANG) at Farnham Park; or</p>

		ii) a bespoke solution to provide adequate mitigation measures to avoid any potential adverse effects; and"
PM13	45	<p>1st column - 4th paragraph</p> <p>Amend to read as follows:</p> <p>"Other than Farnham Park which has a capacity to accommodate residents from approximately 1,370 dwellings (1 April 2016), no suitable alternative strategic SANG site is currently available to support additional housing in the period to 2031."</p> <p>2nd column - delete 1st paragraph</p>
PM14	46	<p>3rd column – delete text alongside Summary table, and replace with the following text:</p> <p>"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."</p>
PM15	25	<p>POLICY FNP2</p> <p>Add additional clause g) as follows:</p> <p>"g) Does not lead to substantial harm to or total loss of significance of a designated heritage asset".</p>
PM16	28	<p>POLICY FNP4</p> <p>Delete existing text, and replace with the following text:</p>

		<p><u>"POLICY FNP4 ADVERTISEMENT CONTROL</u></p> <p>Within the Plan area, proposals for an Advertisement will be permitted where:</p> <ul style="list-style-type: none"> a) It would not be obtrusive in appearance, cause visual clutter or lead to a proliferation of signs, appear dominant or overbearing in the street scene, or cause significant harm to the appearance of any building on which it would be displayed because of its siting, size, design, construction or materials; b) The level of illumination would cause no significant harm to residential amenity; and c) It would not endanger highway or public safety."
PM17	32	<p>POLICY FNP8</p> <p>Clause c) of the policy as currently drafted be deleted, and be replaced with the following text:</p> <p>"c) Demonstrates that the design, layout and siting of the proposal will not have any adverse effect upon the setting and amenities of adjoining residential properties and the wider residential character of the area."</p>
PM18	33	<p>POLICY FNP9</p> <p>Policy to be retitled "Buildings of Local Merit (Undesignated Heritage Assets)".</p>
PM19	39	POLICY FNP11

		<p>Delete current policy text, and replace with the following text:</p> <p>“Development proposals outside the Built Up Area Boundary, as defined on Map A – Farnham Built Up Area Boundary, will be assessed in terms of their potential impact upon the visual setting and landscape features of the site and its surroundings, and the potential impact upon the biodiversity of the area and other relevant planning considerations, such as the impact of traffic and noise. Proposals which either fail to demonstrate that these impacts can be satisfactorily addressed or which clearly lead to the increased coalescence of settlements within the Plan area and beyond will not be supported”.</p>
PM20	39	<p>Monitoring Target</p> <p>Addition of the words “that increase coalescence” at the end of the current text.</p>
PM21	42	<p>POLICY FNP13</p> <p>Clause a) be amended to read:</p> <p>“a) Protecting Special Protection Areas, Sites of Special Scientific Interest and Local Wildlife Sites (Sites of Nature Conservation Importance), protected and priority species, ancient woodland, veteran or aged trees, and species-rich hedgerows;”</p>
PM22	55	<p>POLICY FNP15</p> <p>The text of the first paragraph be amended to read “....will be encouraged...”.</p>
PM23	55	Table 2 (Farnham Housing Need)

		4th column of the table be headed "3 Bedroom" and the final column of the table be headed "4+ Bedroom".
PM24	60	POLICY FNP18 Delete the word "on" before "B3208" in the final paragraph of the policy.
PM25	65	POLICY FNP21 Delete the words "as defined on" before "Map M" in the first paragraph of the policy.
PM26	68	POLICY FNP23 Amend first paragraph to read: "Within the town centre, as defined on Map L, proposals including Use Classes A1-A5, B1, C1 and D1 will be permitted, where the proposal" Amend clause a) to read: "a) non-A1 uses becoming the dominant ground floor uses within West Street, Downing Street and The Borough"
PM27	77	POLICY FNP26 Policy to be retitled "Sites for New Outdoor Sports Facilities and Other Greenspace Uses" Amend text of policy to read: "Land at Weydon Lane (Brambleton Park), as shown on Map P, and at the Runfold South Quarry Site, as shown on Map Q, is allocated for new outdoor sports facilities and other appropriate greenspace uses, including new sports pitches, associated changing rooms and supplementary landscaping, subject to environmental and land restoration considerations".
PM28	43	Map H

		<p>Delete the "Outdoor Sports notation" from Surrey County Council school playing field sites at Weydon School, Heath End School, All Hallows School, Frensham Heights School, Hale Primary School, William Cobbett Primary School and Weybourne Infant School.</p>
PM29	83	<p>POLICY FNP30</p> <p>Clauses a), c) and d) to be amended as follows:</p> <p>Clause a) to read "Safely located vehicular and pedestrian access where adequate visibility exists or could be created;"</p> <p>Clause c) to read "Residential development proposals ensure that sustainable transport links, including walking and cycling links, are provided to" (and then as existing text).</p> <p>Clause d) to read "Employment and other non-residential development proposals located outside the town centre ensure that sustainable transport links are provided to" (and then as existing text).</p>
PM30	83	<p>Policy FNP30 Targets</p> <p>Amend first target to read "No increase in the number of injury accidents reported in the Neighbourhood Plan area."</p>
PM31	11, 17 and 42	<p>Correction of errors</p> <p>Page 11 – 2nd column – "Biological Action Plan (BAP) species" should read "Biodiversity Action Plan (BAP) priority species".</p> <p>Page 17 – 1st column – "Wey Landscape Project" should read "Wey Landscape Partnership".</p>

		<p>Page 42 – 1st column – “rare ash wetland habitat” should read “rare alder wet woodland habitat”.</p> <p>Page 42 – 1st column – delete the words “(but only just)”</p>
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