

Iain Lynch

Telephone: 01252 712667

(Calls may be monitored or recorded for training purposes)

E-mail: town.clerk@farnham.gov.uk

19th October 2017

Elizabeth Sims
Head of Planning
Waverley Borough Council
The Burys
Godalming
GU9 7RN

Dear Elizabeth

I am writing on behalf of Farnham Town Council with two specific objections to the proposed modifications for the Farnham Local Plan - MMI and MMI5 on the basis that these are not sound. The detailed objection is and these are attached.

Farnham is in a unique position having had its Neighbourhood Plan Made by the Borough Council in July 2017 after successfully defending a legal challenge in the High Court. The Town Council is very concerned that the action of the Borough Council in allocating, with no prior consultation, a significant number of additional homes in Farnham undermines the Neighbourhood Plan. Already developers are claiming that the Neighbourhood Plan is out of date and that sites shown to be unsuitable in the robust evaluation process in the Town Council's call for sites should now be approved. This is contrary to the plan-led approach, developed in partnership with Waverley Borough Council and supported by local people in the Neighbourhood Plan Referendum.

It was known by both authorities that there would be a review of the Neighbourhood Plan in a later part of the plan period, to identify any shortfall in housing numbers, as the majority of the identified sites would be delivered at the beginning of the plan period.

The Town Council believes it is possible to have a sound Local Plan, while retaining respect for a made Neighbourhood Plan and this is evidenced in other boroughs who have chosen to make housing requirements minimum numbers and not allocate sites in areas where there is a made Neighbourhood Plan.



The current proposed modifications are considered by the Town Council to be both inappropriate and not proportionate. Waverley is not required by the Inspector to allocate them in a specific way and indeed the Inspector indicated at the Examination there were other potentially more sustainable locations such as Milford and Witley (given rail and road connections). The Town Council feels strongly that there are more sustainable ways to distribute the numbers and retain the spatial strategy. In addition, the Dunsfold Park team confirmed to the Inspector that it could deliver upwards of 3000 homes before 2032 but Waverley did not increase the allocation there by a single dwelling.

Farnham is being asked to take more housing than the borough's largest brown-field site, despite the fact that the roads around the town are the most congested in the borough and there are air quality issues within the town centre and beyond. In addition, Farnham is about to face unprecedented disruption in the next few years with the development of the Brightwells scheme and the Woolmead, and is also facing the impact of approved developments of around 30,000 new homes bordering Farnham (within six miles) without any infrastructure contributions to mitigate the congestion and poor air quality that will inevitably arise on Farnham's already congested road network.

The Neighbourhood Plan is set to deliver over 2200 homes in the first ten years. It would be more reasonable to expect the town to deliver any shortfall between 2028 and 2032.

In relation to proposed modifications to MMI5 the Town Council does not believe that they are sound as they do not comply with NRM6.

Yours sincerely



Iain Lynch
Town Clerk