

## Developers/ Landowners Responses to Regulation 14 Farnham Neighbourhood Plan Review

A number of developers/ landowners whose site was not included in the Regulation 14 Neighbourhood Plan Review sought to promote their site through the consultation process. The following comments set out the Town Council's response to the representations made on the following sites:

### Land at 35 Frensham Vale, Lower Bourne, Farnham

#### Housing Supply

The Farnham Neighbourhood Plan Review must be in general conformity with the strategic policies of the adopted development plan for the local area. Policy ALH1 of the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, 2018. Each parish is allocated a minimum number of new homes to accommodate (including homes permitted and built since April 2013 and, in the case of the main settlements, anticipated windfall development. For Farnham, the total is 2,780 dwelling.

The Farnham Neighbourhood Plan Review makes provision for at least 2780 dwellings in Farnham Parish from these sources during the Plan period.

#### *Lapse Rate for small sites*

The NPPF states that sites that are not major development and sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence for a site that homes will not be delivered within five years. There is no reference to the need to include a blanket lapse rate in the advice for calculating housing supply. Whilst expected delivery on some sites does sometimes slip, other unanticipated sites may come forward, one example being the recent permission granted on appeal in relation to 96 dwellings at Folly Hill. In the past 3 years during which permissions would now have lapsed (2012/13; 2013/14 and 2014/15), permissions for only a minute number (6 dwellings) have lapsed on small sites in Farnham (ie without being implemented or replaced by a new planning permission). The current guidance clearly sets out a presumption that sites with planning permission will come forward unless there is clear evidence to the contrary and there is no justification to apply a blanket lapse rate. Such an approach was not considered necessary for the made Neighbourhood Plan. The Borough Council considers that all small sites with outstanding planning permission are deliverable ie within five years of 1st April 2018. The Local Plan Inspector examining the plan considered that as the NPPF did not require a blanket discount of this scale the lapse rate "may therefore lead to an unnecessarily pessimistic assessment of the 5 year supply position". Applying a lapse rate to planning permissions in Farnham is not justified.

#### *Large Site Windfalls*

In relation to large site windfalls, the adopted Waverley Local Plan makes an allowance for such windfalls as part of its housing land supply. It would be perverse and illogical if one of

the Borough's largest towns were excluded from such provision. Indeed, the made Neighbourhood Plan (Page 46) makes provision for a large site windfalls allowance based on the Borough Council's calculation of a windfall allowance. There is every justification for the inclusion of large site windfalls in Farnham as it is difficult to capture all land owners' intentions for the long term and, whilst every effort has been made to allocate suitable sites over 0.2ha, this is based on current known land owners' intentions. Indeed, this is clearly illustrated by the most recent Call for Sites exercise when additional suitable large sites came forward only a year since the Farnham Neighbourhood Plan was made.

The housing allocations made in Policy FNP14 of the Regulation 15 Neighbourhood Plan Review are all available as confirmed by landowners, suitable and can be developed at the capacity stated in the Plan Review.

### **SANG**

The SANG provision (including allocations) can all be made available as confirmed by landowners, is suitable (according to Natural England) and can be developed to serve at least the capacity of housing included in the Neighbourhood Plan Review.

### **Site Representation**

A large number of sites have been assessed for housing development in preparing the Neighbourhood Plan Review and, for the reasons set out in the FHLLA accompanying the Regulation 15 Neighbourhood Plan, the Land at 35 Frensham Vale, Lower Bourne site is not considered to be suitable.

## **Land at Farnham Park Hotel and Restaurant, Lower Hale Road**

### **Housing Supply**

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### **Site Representation**

A large number of sites have been assessed for housing development in preparing the Neighbourhood Plan Review and, for the reasons set out in the FHLLA accompanying the Regulation 15 Neighbourhood Plan, the Land at Farnham Park Hotel and Restaurant, Lower Hale Road site is not considered to be suitable.

## Site at Lower Weybourne Lane, Badshot Lea

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### **Site Representation**

A large number of sites have been assessed for housing development in preparing the Neighbourhood Plan Review and, for the reasons set out in the FHLAA accompanying the Regulation 15 Neighbourhood Plan, the Land at Lower Weybourne Lane, Badshot Lea site is not considered to be suitable.

## **Land South of Badshot Lea**

### **Housing Supply**

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## **Land west of Folly Hill**

Consent was granted at appeal for 96 dwellings on this site (Appeal Ref: APP/R3650/W/17/3171409).

## Land at Manley Bridge Road, Rowledge

### Housing Supply

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It is proposed to delete **Policy FNP14 n) 8, 10, 12, 14 Upper Old Park Lane and Policy FNP14 p) Land adjacent to Green Lane Cemetery** as housing allocations in the Regulation 15 Neighbourhood Plan in part due to unsuitable access.

**Policy FNP14 l) University for the Creative Arts:** Proposals have been granted planning consent since the publication of the Regulation 14 Neighbourhood Plan. UCA have confirmed that their numbers oscillate around 2,250 on the campus and that numbers are not set to grow significantly beyond this.

**Policy FNP14 m) Centrum Business Park** site comprises a number of A1 (retail); D2 (fitness centre) and sui generis (garage/ MOT) uses. However, the brownfield site is close to the town centre and sustainable transport options; is currently under-utilised and there is an identified need for new homes. The site has capacity for approximately 150 dwellings with undercroft parking. There would be limited employment loss from this site (approximately 22 jobs) but this minor loss would have no significant impact on the local economy. Local Plan – Part 1 Policy EE2: Protecting Existing Employment Sites only applies to Class B Uses and does not therefore apply to this part of the site. The promoters of the Centrum site (the only site abutting the AQMA) have submitted an Air Quality Impact Assessment This concludes that the change of use of the site from commercial to residential will contribute to a reduced impact on air quality with in the Farnham AQMA. The amount and nature of traffic to be accommodated on site can be successfully managed to reflect the Air Quality Management Plans objectives. There will be a significant decrease in the number of heavy goods vehicles and diesel-powered vans visiting the site and provision for electric vehicle charging points within the under-croft parking areas will encourage private car owners to switch to less polluting electric / hybrid vehicles. The requirement for electric vehicle charging points to mitigate the impact of the development through future use will be embraced within the scheme and as part of an agreement between Surrey County Council and Surrey Borough Authorities. Other sites are close to, but not within, the AQMA and have greater opportunity to avoid adverse impacts on the AQMA than greenfield sites at the edge of town which are likely to require car travel in or through the AQMA to access employment, rail services, the town centre facilities etc.

**Policy FNP14 q) Surrey Sawmill:** The site comprises a Class B2 use which now adjoins an extensive new residential development. There would be limited employment loss from this site. However, the brownfield site is within the built up area boundary and close to a sustainable transport options; is currently under-utilised and there is an identified need for new homes. Local Plan – Part 1 Policy EE2: Protecting Existing Employment Sites would apply to this site but there is an identified need for new homes and, given the limited

employment on the site and the opportunities for land based industries elsewhere within the rural part of the Plan area, there are no strong economic reasons why such a development would be inappropriate. Land to the north of the site outside of the Built Up Area Boundary and not allocated for housing development is within the control of the landowner and would be suitable as a buffer zone between the allocated site and the ancient woodland and would not need to compromise the capacity of the site.

In relation to large site windfalls, the adopted Waverley Local Plan makes an allowance for large site windfalls as part of its housing land supply. It would be perverse and illogical if one of the Borough's largest towns were excluded from such provision. Indeed, the made Neighbourhood Plan (Page 46) makes provision for a large site windfalls allowance based on the Borough Council's calculation of a windfall allowance. There is every justification for the inclusion of large site windfalls in Farnham as it is difficult to capture all land owners' intentions for the long term and, whilst every effort has been made to allocate suitable sites over 0.2ha, this is based on current known land owners' intentions. Indeed, this is clearly illustrated by the most recent Call for Sites exercise when additional suitable large sites came forward only a year since the Farnham Neighbourhood Plan was made.

The Farnham Neighbourhood Plan Review makes provision for at least 2780 dwellings in Farnham Parish from these sources during the Plan period.

### **Site Representation**

A large number of sites have been assessed for housing development in preparing the Neighbourhood Plan Review and, for the reasons set out in the FHLAA accompanying the Regulation 15 Neighbourhood Plan, the Land Manley Bridge Road, Rowledge is not considered to be suitable.

## **Land to the South of Monkton Lane**

### **Basic Conditions**

The Regulation 15 Farnham Neighbourhood Plan Review meets the Basic Conditions.

### **NPPF**

The Regulation 15 Neighbourhood Plan Review takes account of the NPPF, 2018.

### **Site Representation**

A large number of sites have been assessed for housing development in preparing the Neighbourhood Plan Review and, for the reasons set out in the FHLAA accompanying the Regulation 15 Neighbourhood Plan, the Land to the south of South of Monkton Lane is not considered to be suitable.

## **FHLAA**

The FHLAA accompanying the Regulation 15 Neighbourhood Plan tests each site which meets the FHLAA criteria for its suitability, availability and achievability.

**Policy FNP14a) Part of SSE Farnham depot, Lower Weybourne Lane** and adjoining land The site is not protected by Policy FNP17 - Land for Business of the made Neighbourhood Plan. Policy EE2 of the adopted Local Plan seeks to protect sites in Use Class B (business use) and therefore does not apply to this site. In fact, the Borough Council supports the allocation of this site.

**Policy FNP14 b) Land west of Green Lane, Badshot Lea (in accordance with Planning Application Ref. WA/2015/2283).** It is not anticipated that the capacity of 105 dwellings will need to be amended.

**Policy FNP14 d) Land between Hale Road and Guildford Road** Application WA/2016/2240 relates to an entirely separate site accessed from 14A Abbott House, Hale Road, rather than Guildford Road. The capacity of the allocated site therefore remains at 10 dwellings as in the made Neighbourhood Plan as accepted by a range of developers at the Examination.

**Policy FNP14 e) Colemans yard, Wrecclesham Road.** The site is not protected by Policy FNP17 - Land for Business of the made Neighbourhood Plan. Policy EE2 of the adopted Local Plan seeks to protect sites in Use Class B (business use) and therefore does not apply to this site. In fact, the Borough Council supports the allocation of this site. The capacity of the allocated site therefore remains at 10 dwellings as in the made Neighbourhood Plan as accepted by a range of developers at the Examination.

**Policy FNP14 f) West of Switchback Lane, Rowledge** No change in circumstances has occurred since the site was allocated for 10 dwellings in the made Neighbourhood Plan and the capacity should therefore remain at 10 dwellings as accepted by a range of developers at the Examination.

**Policy FNP14h) Cobgates, Falkner Road** Although the developer accepts the capacity of this site at 60 dwellings, the Landscape Guidelines should refer to the protection of the mature trees along Falkner Road to help protect the setting of the Conservation Area and the capacity of the site has consequently been reviewed to 40 dwellings.

### **Policy FNP14 I) University for the Creative Arts**

There is a need for student accommodation in Farnham. On site accommodation will free up market housing currently occupied by students. UCA have confirmed that their numbers oscillate around 2,250 on the campus and that numbers are not set to grow significantly beyond this.

**Policy FNP14i) Centrum Business Park, East Street** The comprises a number of A1 (retail); D2 (fitness centre) and sui generis (garage/ MOT) uses. However, the brownfield site is close to the town centre and sustainable transport options; is currently under-utilised and there is an identified need for new homes. There would be limited employment loss from this site (approximately 22 jobs) but this minor loss would have no significant impact on the local economy. Local Plan – Part 1 Policy EE2 only applies to Class B Uses and does not



therefore apply to this part of the site. The site promoter has sought to provide undercroft parking to optimise the development potential of the site and to avoid blank frontages at street level and the capacity has been amended to approximately 150 dwellings with undercroft parking.

**Policy FNP14 8, 10, 12, 14 Upper Old Park Lane** The site is constrained by a number of trees; has capacity for a limited number of dwellings and is in multiple ownership which may constrain its comprehensive development as a housing allocation. The site is accessed by an unadopted Upper Old Park Lane which is narrow and has no footpath and improvements to adoptable highway standards may adversely affect the mature oak trees which line the route. For these reasons, the site is not proposed to be carried forward as a housing allocation in the Neighbourhood Plan. The site remains within the Built Up Area Boundary and any development proposals would have to be assessed against Policy FNP1 of the NP Review and the adopted Farnham Design Statement 2010. Nevertheless the site is deleted as a housing allocation.

**Policy FNP14j) Kimbers Lane** is a brownfield site with no significant constraints. It is conveniently located to services and facilities including a bus stop. There are no highway objections to the development of the site for approximately 20 dwellings from Waverley Borough Council as local highway authority provided traffic management measures are put in place. Development could enhance the setting of the historic Pump House. The training centre has been transferred to the Memorial Hall and the site is confirmed as available by the landowner.

**Policy FNP14 Land adjacent to Green Lane Cemetery** The site is not currently served by a suitable vehicular access. The site is constrained by a number of trees and has capacity for a limited number of dwellings. Achieving a suitable access to such a small development is likely to prove problematic and the Town Council proposes to delete this housing allocation.

**Policy FNP14k) Surrey Sawmill, Wrecclesham Hill** The site comprises a Class B2 use which now adjoins an extensive new residential development. There would be limited employment loss from this site. However, the brownfield site is within the built up area boundary and close to a sustainable transport options; is currently under-utilised. Local Plan – Part 1 Policy EE2: Protecting Existing Employment Sites would apply to this site but there is an identified need for new homes and, given the limited employment on the site and the opportunities for land based industries elsewhere within the rural part of the Plan area, there are no strong economic reasons why such a development would be inappropriate.

## **Land to rear of Three Stiles Road**

Neither the agent nor the developer has been able to demonstrate that the site is accessible and therefore the site is considered unsuitable and unachievable.