

# Farnham Neighbourhood Plan Review

(Regulation 15)

## Sustainability Appraisal/ Strategic

## Environmental Assessment

## Non Technical Summary

Farnham Town Council

January 2019

# Contents

Section 1: Introduction	3
Section 2: Key Sustainability Issues	5
Section 3: Sustainability Objectives	7
Section 4: Testing the Neighbourhood Plan Review Objectives	8
Section 5: Sustainability Appraisal of Development Options	11
Section 6: Sustainability Appraisal of Neighbourhood Plan Review Policies	20
Section 7: Conclusions	23

## Section 1 Introduction

This Non-technical Summary provides a summary of the Sustainability Appraisal, which incorporates Strategic Environmental Assessment, of the Regulation 15 Farnham Neighbourhood Plan Review. It summarises the stages of Sustainability Appraisal undertaken and provides a brief overview of key sustainability issues facing the Neighbourhood Plan area and a summary of the findings of the Sustainability Appraisal assessment of the Neighbourhood Plan Review development options and policies.

Detailed findings, along with a full list of plans, policies and programmes that have influenced development of the policies and the Sustainable Appraisal Objectives, along with the baseline information and consultation responses can be found in the full Sustainability Appraisal/ Strategic Environmental Assessment.

### What is Sustainability Appraisal/Strategic Environmental Appraisal?

To help ensure that the Farnham Neighbourhood Plan Review is sustainable, it is best practice in the UK to undertake a Sustainability Appraisal (SA). An SA is a process that aims to predict and then assess the economic, environmental and social effects likely to arise from the adoption of the Neighbourhood Plan Review.

Where a neighbourhood plan could have significant environmental effects, it may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require a strategic environmental assessment (SEA). In April 2016, Waverley Borough Council issued a screening opinion that an SEA was required to be undertaken for the Farnham Neighbourhood Plan.

One of the basic conditions that will be tested by the independent examiner of a Neighbourhood Plan Review is whether the making of the plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).

SEA is a process for identifying the environmental impacts likely to arise from the Plan Review. As both the SA and the SEA aim to predict and assess the impacts of plans, they are usually combined to avoid duplication. They are referred to as the SA/SEA. It is the intention that the SA/SEA will be used as the basis for appraising the Neighbourhood Plan Review, and proposes the methodology that will be used to do this.

An SA/SEA Scoping Report was published in September 2014 outlining the main issues that will need to be considered when planning development in Farnham. An SA/SEA accompanied the Regulation 14 Neighbourhood Plan in October 2014; the Regulation 15 Farnham Neighbourhood Plan in June 2016; the Regulation 14 Neighbourhood Plan Review in August 2018 and now the Regulation 15 Neighbourhood Plan Review.

### Methodology of Sustainability Appraisal/ Strategic Environmental Assessment

The methodology of the SA/ SEA conforms with current national planning practice guidance (on strategic environmental assessment and sustainability appraisal (updated February 2015)).

Whilst early public engagement took place on the potential issues for the Neighbourhood Plan, a review was undertaken of the planning policies affecting Farnham. In addition, social, economic and environmental information (baseline data) was collected and analysed. This information was collected from local studies; public engagement on the Farnham Neighbourhood Plan carried out in 2012 and 2013, and other evidence

published at District and County levels. The policy review and baseline data were taken into consideration in drawing up a list of key issues affecting Farnham and a set of sustainability objectives.

This process was written up in the SA Scoping Report, which was put out for public consultation in Summer 2014. The Scoping Report included a summary of the baseline data, the implications of concurrent plans, policies and programmes on Farnham; proposed Sustainability Objectives and monitoring indicators. The Scoping Report also described the proposed methodology for undertaking the SA/SEA of the draft Neighbourhood Plan. The Scoping Report was circulated for consultation with statutory consultees and interested parties during the summer 2014. The consultation responses were then considered and, where appropriate, amendments were incorporated into a Final Scoping Report (September 2014).

The next step was the preparation of the draft Farnham Neighbourhood Plan (FNP) (Regulation 14) SA/SEA. First the draft FNP Objectives were tested for compatibility with the sustainability objectives. Then a range of policy options were each tested against the sustainability objectives. Each policy option was scored according to whether its impact on the Objective would be: significantly negative, minor negative, no impact, uncertain impact, minor positive or significantly positive. In addition, where potential impacts were identified on sustainability objectives, recommendations were made to remove or reduce negative impacts and enhance positive ones. Where possible, these recommendations were taken into account in preparing the draft FNP. In some cases, in order to increase the positive impacts of the draft policies and to reduce their negative impacts, recommendations were made for the Regulation 15 Submission Neighbourhood Plan. The cumulative impact of all the policies in the FNP were considered, as has the possible impact of any major developments proposed in Waverley and in neighbouring districts.

The next step was the preparation of the Submission Farnham Neighbourhood Plan (Regulation 15) Sustainability Appraisal/ Strategic Environmental Assessment. A topic-based assessment of the Farnham Baseline situation and Key Issues were updated for this SA/SEA. The FNP Objectives were again tested for compatibility with the sustainability objectives. Given the updated Baseline and evidence base, and the then emerging Local Plan, a range of policy options were tested against the sustainability objectives. Each policy option was scored according to whether its impact on the objective would be: significantly negative, minor negative, no impact, uncertain impact, minor positive or significantly positive. Specific Neighbourhood Plan policies were tested in the same way. The cumulative impacts of all the policies in the FNP were considered, as was the possible impact of any major development proposed in Waverley and in neighbouring districts.

The next step was the preparation of the draft Farnham Neighbourhood Plan Review (FNPR) (Regulation 14) Sustainability Appraisal/ Strategic Environmental Assessment. Once again the same process was repeated.

Finally, the Farnham Neighbourhood Plan Review (FNPR) (Regulation 15) Sustainability Appraisal/ Strategic Environmental Assessment followed the same process.

## Section 2: Key Sustainability Issues

The baseline situation and key issues were updated for the SA/SEA and are set out below:

### Key Issues for Farnham

#### Housing

There is a need to ensure that there is adequate housing available in a range of sizes and tenures to meet local needs whilst protecting the local environment and quality of life, including smaller homes, student housing and specialist elderly housing schemes.

Identifying suitable, sustainable locations to meet housing requirements.

#### Landscape and Open Space

Local residents fear the coalescence of settlements which would harm settlement identity and character.

Pressures to build housing or other built development could threaten valued areas of open space, views, the landscape setting of Farnham and accessibility to the countryside.

Traffic and transport infrastructure are harmful to landscape character.

The urban fringe around Farnham and along the A31 corridor could be enhanced.

Local consultation indicates that Farnham Park and its historic setting, Bishops Meadow and Gostrey Meadow are particularly valued open spaces.

#### Jobs and Employment

There is a level of commuting out of the County.

Demand for housing or other uses could result in the loss of some employment space.

Redevelopment in and around East Street could provide opportunities to enhance the mix of uses and quality of the environment in the town centre, but there is local concern about the design and mix of uses as proposed.

The future of the Woolmead and vacant sites.

Retention of independent retailers and neighbourhood centres that reduce the need to travel by car.

Retention of a mix of employment opportunities to promote a vibrant local economy.

Support for small businesses and agricultural diversification.

Perceived shortage of high quality employment sites.

Tourism is based on visitors to the historic centre and attractions

#### Transport

Heavy volumes of traffic on major routes and passing through Farnham town centre causing congestion at peak times and contributing to climate change, pollution, loss of amenity and creating safety issues.

Future development in and outside Farnham has the potential to exacerbate existing road traffic issues.

Large vehicles and heavy traffic on rural roads.

Poor environment for pedestrians and cyclists at some locations.

Heavy goods vehicles unloading on the road.

Challenges created by narrow, historic roads in handling volume of traffic, developing safe cycle and pedestrian routes and promoting public transport.

Parking issues in the town centre.

### **Infrastructure**

Existing and future pressure on the road and rail transport systems and for parking.

Congestion in central Farnham.

The need for safe networks and crossings for cyclists and pedestrians.

Pressure on school places for the current and predicted populations.

Open space provision generally good but some deficiencies in recreation open space.

Shortage of facilities for young people.

Improvements to broadband/technical infrastructure.

Protection and expansion of cultural facilities.

Ensuring any new development is supported by adequate infrastructure development including water supply and waste water treatment.

The potential impact of large scale developments in surrounding towns.

### **Pollution**

An Air Quality Management Area has been designated in Farnham due to Nitrogen Dioxide emissions mainly from traffic.

The chemical quality of the River Wey and Blackwater River is currently good but the ecological quality is moderate/poor.

### **Ecology and Biodiversity**

Farnham incorporates several areas of local or national natural conservation interest and is within the buffer zone of European SPAs and a SAC.

The variety of local habitats including farmland, woodland, water features, heathland and urban green spaces encourages a wide diversity of flora and fauna including priority species.

There are several areas within Farnham which could be improved to enhance their ecology and biodiversity.

Identifying suitable SANG provision.

### **Design and Heritage**

Maintaining the character of distinct areas in and around Farnham.

Promotion of good design.

### **Water**

Farnham suffers from water stress along with the rest of the South East region of England

The need to reduce flood risk and the impact of flooding now and in the future.

The increased pressure on water resources likely to occur with future development in Farnham and in neighbouring areas.

The need to improve water quality and the biodiversity value of water features.

## Energy

Absence of information on the scope for non-renewable technologies in Farnham.

Community-scale energy schemes could be viable in Farnham.

Landscape impacts mean that large scale renewable technologies are likely to be inappropriate in Farnham.

## Climate Change

The principal effects of climate change in Farnham will be rising temperatures, impacts on water resources, particularly the frequency and severity of flooding and impacts on biodiversity.

Climate change measures will need to address the causes of climate change, mitigation of its effects and adaptation.

Carbon emissions from domestic and industrial sources and from traffic contribute to global warming.

## Section 3: Sustainability Objectives

The Sustainability Objectives for Farnham Neighbourhood Plan were derived from a review of policies and documents including the Waverley Borough Sustainability Objectives; an understanding of the key issues facing Farnham and consultation with the Environment Agency; Historic England and Natural England

The Sustainability Objectives for Farnham are as follows:

1.	To ensure that everyone has the opportunity to live in a decent and affordable home of the appropriate size, type and tenure.
2.	To protect, enhance and make accessible for enjoyment, the town's open spaces and high quality and sensitive landscape and prevent the coalescence of settlements.
3.	To promote opportunities for employment within the Town and support Farnham town centre, local businesses and tourism.
4.	To reduce the need to travel by car for local journeys, reduce road congestion, improve air quality and improve and promote travel by cycle and on foot within the Town.
5.	To ensure adequate amenities for local residents, including health, education, local shopping and leisure facilities.
6.	To conserve and enhance biodiversity and prevent any significant adverse effect on sites of national and international importance.
7.	To ensure development complements the character of the town's individual neighbourhoods.
8.	To maintain and improve the water quality of the Town's watercourses and to achieve sustainable water resources management.
9.	To reduce and manage the risk of flooding and any consequential harmful impacts to public wellbeing, the local economy and the environment.
10.	To increase energy efficiency and the proportion of energy generated from renewable sources in the Town and to utilize sustainably produced and local products in new developments where possible.
11.	To reduce the Town's impact on climate change and prepare the community and environment for its impacts.
12.	To conserve and enhance the historic environment, heritage assets and their settings and the distinctive built heritage of the area.

## Section 4: Testing the Neighbourhood Plan Review Objectives

To ensure that the Regulation 15 Neighbourhood Plan Review is sustainable, it is necessary to test the objectives of the FNPR against the Sustainability Objectives.

### Neighbourhood Plan Review Objectives

#### Environment

- To conserve and enhance the distinctive built heritage of the area.
- To ensure development is well designed and takes into account the distinctive character and heritage of each of Farnham's individual areas.
- To protect the identity and distinctive character of the different areas of Farnham and prevent the coalescence of Farnham and Aldershot; Badshot Lea and Weybourne; Rowledge and Wrecclesham, Rowledge and Boundstone and Rowledge and Frensham
- To protect and enhance the landscape around the town including the Surrey Hills AONB; areas of high landscape value and sensitivity; Farnham Park and its historic setting and the well wooded arcadian character of south Farnham
- To protect and enhance and improve connectivity between important green spaces of the whole town, including the strategically important Farnham Park, the Bishops Meadow and the Wey corridor
- To retain and extend the diversity of wildlife and habitats throughout the Neighbourhood Plan area
- To maintain the integrity of all Special Protection Areas (SPAs) and SSSIs

#### Housing

- To ensure an adequate supply and mix of housing to meet strategically identified needs within the identified environmental constraints of Farnham.'
- To make the best and effective use of brownfield sites
- To ensure the development of greenfield sites is well integrated with the adjoining countryside by retaining and enhancing landscape features (such as woodland, hedgerows, mature trees, watercourses and ponds) and providing a good standard of amenity space and sensitive landscape edges

#### Employment

- To support a balanced local economy with a thriving town centre office sector and a range of business units (including for creative industries) with good access around Farnham
- To retain and regenerate well located existing employment sites

#### Farnham Town Centre and Local Centres

- To retain and enhance the attractive historic market town centre as the economic and social hub of Farnham
- To retain a range of unit sizes within the town centre to promote a variety of retailers, including independent stores, and a thriving evening economy with a range of pubs and restaurants
- To protect the clusters of shops and services at neighbourhood centres serving the local communities of Farnham

#### Leisure and Wellbeing

- To protect and enhance public green spaces used for recreational purposes throughout the area, including links between open spaces and leisure activities, and ensure new provision in association with new development
- To improve sports provision in and around Farnham



- To protect the cultural attractions of the town

### Infrastructure

- To ensure sufficient infrastructure capacity is provided in a timely manner, appropriate to the scale of new development
- To ensure new development is well connected to the facilities of Farnham by a range of transport modes, including walking, cycling and public transport and, where appropriate, makes suitable provision towards new sustainable transport infrastructure
- To improve air quality within the town centre
- To ensure Farnham’s extensive network of footpaths, bridleways and cycle ways is protected and where possible extended through new development to continue to provide access to local facilities and the countryside
- To increase school places at all levels
- To ensure sufficient sewage treatment capacity is available to serve new development.

### Testing the Neighbourhood Plan Review Objectives

A matrix was prepared testing each Neighbourhood Plan Review Objective against each SA Objective. The key to the matrix is as follows:

	Objectives are compatible
	Compatibility is unclear
	Objectives are incompatible
	No obvious relationship between the objectives

Neighbourhood Plan Review Objectives	Sustainability Objectives											
	Homes	Landscape/ Open Space	Employment/Centres	Transport/Air Quality	Amenities	Biodiversity	Character	Water Resources/ Quality	Flooding	Energy Efficiency	Climate Change	Heritage
1	Orange		Orange		Orange		Green			Orange	Orange	Green
2	Green		Green	Green			Green			Orange		Green
3	Orange		Green	Green	Green	Green						Green
4	Orange		Green	Green	Green	Green	Green	Green		Green		Green
5	Orange		Green	Green	Green	Green	Green	Green		Green		Green
6	Orange		Green	Green		Green		Green		Green		Green
7	Orange	Green		Green		Green		Green		Green		Green
8	Green	Orange	Orange	Orange		Orange		Orange	Orange	Orange	Orange	Orange
9	Green		Green	Green		Green	Green		Green	Green		Orange
10		Green		Green	Green	Green	Green	Green		Green		Green
11	Orange	Orange	Green	Orange	Green	Orange				Orange	Orange	
12	Orange	Orange	Green	Orange	Green	Orange				Orange	Orange	
13			Green	Orange	Green		Green			Orange	Orange	Green
14	Orange		Green	Green	Green		Green			Green		Green
15	Orange		Green	Green	Green		Green			Green		Green
16	Orange	Green		Green	Green	Green	Green	Green		Green		Green
17		Green		Green	Green					Green		Green
18			Green		Green	Green	Green					Green
19	Green	Orange	Green	Orange		Orange		Green	Green			Orange
20		Green	Green	Green	Green	Green				Green	Green	Green
21		Green		Green	Green	Green	Green			Green	Green	Green
22		Green	Green		Green	Green	Green	Green	Green	Green	Green	Green
23			Green	Orange	Green	Orange					Orange	
24	Green							Green				

### Summary of Comparison of Objectives

The appraisal of the compatibility between the Neighbourhood Plan Review objectives and the SA objectives revealed no contradictions. Most of the Neighbourhood Plan Review Objectives are compatible with the Sustainability Objectives. Overall, it demonstrates that the Neighbourhood Plan Review Objectives are broadly sustainable. No objectives are considered to be incompatible. All of the Sustainability Objectives are addressed by the Neighbourhood Plan Review Objectives.

Overall, there is good compatibility between the Neighbourhood Plan Review objectives and the SA/ SEA objectives.

## Section 5: Sustainability Appraisal of Development Options

The SA/ SEA describes how there has been an appraisal of development options. The SEA Directive requires the appraisal to appraise 'reasonable development alternatives'. The likely significant effects on the environment of implementing the Neighbourhood Plan Review and reasonable alternatives taking into account the objectives and the geographical scope of the plan, should be identified, described and evaluated (Article 5(1) of the Directive).

In the light of the updated baseline situation and evidence base, and the adopted Local Plan, it has been possible to identify a number of reasonable alternative strategic approaches to planning Farnham over the period to 2032. Reasonable alternatives have been identified and appraised for the following:

- housing growth: the number of homes to be developed
- economic development growth
- strategic distribution of development at Farnham

Such options have been tested against the sustainability objectives identified in the SA/SEA.

### **Housing Growth: the number of homes to be developed**

#### **What are the reasonable alternatives?**

The Neighbourhood Plan Review should plan positively to help accommodate identified strategic housing need. The Waverley Borough Local Plan Part 1: Strategic Policies and Sites, 2018 was adopted ahead of preparation of the Regulation 15 Neighbourhood Plan Review. The Local Plan seeks to meet the objectively assessed housing need of at least 11,210 net additional homes within the Borough in the period from 2013 to 2032 (equivalent to at least 590 dwellings a year). 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 such as Farnham, anticipated windfall development): Farnham's share of this provision is at least 2,780.

Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan and should not promote less development than set out in the Local Plan. Thus an option which promotes less than 2,780 dwellings is not a reasonable alternative.

Both the Borough's and Farnham's housing requirement is expressed as a minimum number of homes and thus it is open to the Neighbourhood Plan Review to exceed this requirement. However, the recently adopted Local Plan demonstrates how the Borough can meet its housing targets across a broad range of settlements without requiring additional housing at Farnham. In addition, Farnham is within the buffer zone of the Thames Basin Heath SPA and the retained South East Plan Policy NRM6 states that priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. In order to comply with this policy, housing to meet the strategic housing need of the Borough should generally be directed away from Farnham. Significantly exceeding 2,780 new dwellings in Farnham would therefore not comply with retained South East Plan Policy NRM6 or the strategic distribution of development in the adopted Local Plan – Part 1 and is therefore not a reasonable option at this time.

Thus meeting the housing requirement of 2,780 dwellings currently represents the only reasonable alternative for the number of new homes within the Plan area (**Alternative 1.1**).

## Appraisal of Housing Development Alternative

It is necessary for the SA/ SEA to examine the impacts of the reasonable alternative against the SA/ SEA objectives.

*SA/ SEA objectives*

<b>Housing Growth Alternative</b>	<b>Alternative 1.1 Approximately 2,780 new homes within the Plan area</b>
<b>SA/ SEA Objective</b>	
1 To ensure that everyone has the opportunity to live in a decent and affordable home of the appropriate size, type and tenure.	++
2 To protect, enhance and make accessible for enjoyment, the town's open spaces and high quality and sensitive landscape and prevent the coalescence of settlements.	?
3 To promote opportunities for employment within the Town and support Farnham town centre, local businesses and tourism.	+
4 To reduce the need to travel by car for local journeys, reduce road congestion, improve air quality and improve and promote travel by cycle and on foot within the Town.	-
5 To ensure adequate amenities for local residents, including health, education, local shopping and leisure facilities.	?
6 To conserve and enhance biodiversity and prevent any significant adverse effect on sites of national and international importance.	?
7 To ensure development complements the character of the town's individual neighbourhoods.	?
8 To maintain and improve the water quality of the Town's watercourses and to achieve sustainable water resources management.	?
9 To reduce and manage the risk of flooding and any consequential harmful impacts to public wellbeing, the local economy and the environment.	?
10 To increase energy efficiency and the proportion of energy generated from renewable sources in the Town and to utilize sustainably produced and local products in new developments where possible.	?
11 To reduce the Town's impact on climate change and prepare the community and environment for its impacts.	-
12 To conserve and enhance the historic environment, heritage assets and their settings and the distinctive built heritage of the area.	?

SCORE	DESCRIPTION	SYMBOL
Significant Positive Effect	The development alternative contributes significantly to the achievement of the objective	++
Minor Positive Effect	The development alternative contributes to the achievement of the objective but not significantly	+
Neutral	The development alternative does not have any effect on the achievement of the objective	0
Minor Negative Effect	The development alternative detracts from the achievement of the objective but not significantly	-
Significant Negative Effect	The development alternative detracts significantly from the achievement of the objective	--
No Relationship	There is no clear relationship between the development alternative and the achievement of the objective or the relationship is negligible	/
Uncertain	The effect on the objective is uncertain and subject to implementation	?

### Which is the most sustainable alternative?

There is only one reasonable alternative for the number of new homes within the Plan area to evaluate in this instance. Clearly Alternative 1.1 contributes significantly to the achievement of ensuring the delivery of decent and affordable homes of the appropriate size, type and tenure and this would have a significant positive effect on this objective. This option would have short term employment benefits and could help support Farnham town centre and local businesses creating a minor positive effect on this objective. The amount of housing included within Alternative 1.1 reduces the potential negative environmental impacts particularly on the Thames Basin Heaths SPA. However the impact on open space, landscape of high value and sensitivity, coalescence, heritage assets and the floodplain will depend on the location of this quantum of development and therefore without this spatial distribution many of the impacts are uncertain. Subject to careful siting, this Alternative could have significant positive impacts on these environmental objectives. However, poorly located sites could have a significant negative impact. New development would potentially increase the need to travel by car for local journeys, increase road congestion and reduce air quality but the quantity of homes and the promotion of sustainable modes of travel should reduce this to a minor negative impact.

### Economic Development Growth

#### What are the reasonable alternatives?

The Borough Council published the borough-wide Employment Land Review Updates, 2014 and 2016 and the Town Centres Retail Study Update, 2013. The ELR recommends that in addition to providing additional B1a/b floorspace it is also important that the Borough provides a continuing supply of land suitable for B2 and B8 use classes as well as premises meeting the business needs of all sizes including SMEs in order to maintain a healthy mix of businesses. The Town Centres Retail Study Update, 2013 forecast's a potential need for 1,517 sq m floorspace (net) convenience floorspace and 14,610 sqm (net) comparison floorpace during the Plan period.

The Neighbourhood Plan Review should plan positively to help accommodate identified strategic business need. The Waverley Borough Local Plan Part 1: Strategic Policies and Sites, 2018, signals the need for the sustainable redevelopment, intensification and/or

expansion of sites presently used for employment uses; supporting the town centre; the re-use and conversion of existing rural buildings; tourism and a new site on Land off Water Lane, Farnham within the Plan area. Helping to **meet the economic needs of the Borough by following the policy Approach of the Local Plan – Part 1** represents a reasonable alternative for the Neighbourhood Plan Review (**Alternative 2.1**).

Unlike housing development, business growth is not limited by SANG and the quantum distribution of business floorspace is not specified in the Local Plan Part 1. An alternative option may be to **significantly exceed the projected economic development needs in Farnham (Alternative 2.2)**.

### Appraisal of Economic Development Alternatives

It is necessary for the SA/ SEA to examine the impacts of each alternative to assist the Town Council in selecting the appropriate economic development growth. The alternatives are tested against the SA/ SEA objectives.

#### SA/ SEA objectives

<b>Economic Development Alternatives</b>	<b>Alternative 2.1 Assist meeting the economic needs of the Borough by following the policy approach of the Local Plan – Part 1</b>	<b>Alternative 2.2 Significantly exceed the projected economic development needs in Farnham</b>
<b>SA/ SEA Objective</b>		
1 To ensure that everyone has the opportunity to live in a decent and affordable home of the appropriate size, type and tenure.	0	0
2 To protect, enhance and make accessible for enjoyment, the town’s open spaces and high quality and sensitive landscape and prevent the coalescence of settlements.	+	--
3 To promote opportunities for employment within the Town and support Farnham town centre, local businesses and tourism.	++	++
4 To reduce the need to travel by car for local journeys, reduce road congestion, improve air quality and improve and promote travel by cycle and on foot within the Town.	-	--
5 To ensure adequate amenities for local residents, including health, education, local shopping and leisure facilities.	+	+
6 To conserve and enhance biodiversity and prevent any significant adverse effect on sites of national and international importance.	+	--
7 To ensure development complements the character of the town’s individual neighbourhoods.	+	--
8 To maintain and improve the water quality of the Town’s watercourses and to achieve sustainable water resources management.	?	?
9 To reduce and manage the risk of flooding	-	--

and any consequential harmful impacts to public wellbeing, the local economy and the environment.		
10 To increase energy efficiency and the proportion of energy generated from renewable sources in the Town and to utilize sustainably produced and local products in new developments where possible.	?	?
11 To reduce the Town's impact on climate change and prepare the community and environment for its impacts.	-	--
12 To conserve and enhance the historic environment, heritage assets and their settings and the distinctive built heritage of the area.	+	--

SCORE	DESCRIPTION	SYMBOL
Significant Positive Effect	The development alternative contributes significantly to the achievement of the objective	++
Minor Positive Effect	The development alternative contributes to the achievement of the objective but not significantly	+
Neutral	The development alternative does not have any effect on the achievement of the objective	0
Minor Negative Effect	The development alternative detracts from the achievement of the objective but not significantly	-
Significant Negative Effect	The development alternative detracts significantly from the achievement of the objective	--
No Relationship	There is no clear relationship between the development alternative and the achievement of the objective or the relationship is negligible	/
Uncertain	The effect on the objective is uncertain and subject to implementation	?

### Which is the most sustainable alternative?

Clearly Alternatives 2.1 and 2.2 development alternatives contribute significantly to the achievement of promoting opportunities for employment within the Town and supporting Farnham town centre, local businesses and tourism and both alternatives would have a significant positive effect on this objective.

Alternative 2.1 by following the policy approach of the Local Plan of retaining and intensifying the use of existing sites; reinforcing the town and neighbourhood centres and allocating a single greenfield site should be able to protect open spaces; coalescence; high quality and sensitive landscape; biodiversity; the character of the town's individual neighbourhoods and the area's historic environment, including the Town Centre Conservation Area. In addition, there should be minor positive benefits to ensuring adequate amenities for local residents, including local shopping. Some of the existing economic development areas are located within Flood Zone 3 but the relatively limited amount of change is likely to lead to a minor negative effect on this objective. By balancing economic and housing development, Alternative 2.1 is likely to have a minor negative impact on transport and air quality objectives and consequently climate change.

Alternative 2.2 would be likely to have a significant adverse effect on the achievement of all environmental objectives. As the opportunities for allocating brownfield sites have been maximised, significant new development would have to rely on greenfield sites where the impact on high quality and sensitive landscapes, coalescence; biodiversity and the floodplain would inevitably be greater with a significant negative effect expected on these

objectives. In addition, the growth of significant economic development beyond the growth of housing enabled by the Plan Review would be likely to result in in-commuting to the detriment of transport and air quality objectives. Overall this alternative is likely to have a significant negative effect on climate change.

In conclusion, Alternatives 2.1 and 2.2 can be shown to have a significant positive effect on promoting opportunities for employment within the town and supporting Farnham town centre, local businesses and tourism. The amount of economic development included within Alternative 2.1 means that significant negative environmental impacts can be avoided with some minor positive effects on a range of environmental objectives and minor negative effects likely to travel by car and air pollution, flooding and climate change. In contrast, Alternative 2.2 would have significant negative impacts on a wide range of environmental objectives. In addition, without significant additional housing growth (which in turn would also have significant negative impacts on environmental objectives) there would be likely to be significant negative impacts on reducing the need to travel by car and air quality.

For the reasons set out above, the preferred alternative for the Neighbourhood Plan Review is following the policy approach of the Local Plan of the redevelopment, intensification and/or expansion of sites presently used for employment uses; the re-use and conversion of existing rural buildings; tourism and a new site on Land off Water Lane, Farnham.

## **Strategic distribution of development at Farnham**

### **What are the reasonable alternatives?**

It is assumed that the preferred housing growth option of approximately 2,780 new homes and economic growth from redevelopment, intensification and/or expansion of sites presently used for employment uses; supporting the town centre; the re-use and conversion of existing rural buildings; tourism and a new site on Land off Water Lane outlined in the SA/SEA will provide the basis for the Farnham Neighbourhood Plan Review.

The made Farnham Neighbourhood Plan facilitates approximately 2,201 new homes in the period 2013 to 2031. Already in the first 5 years good progress is being made towards this target with 1,608 dwellings completed or committed through planning permissions. By definition, the precise location of windfalls cannot be predicted but clear trends indicate that 475 dwellings can be expected on windfall sites across the Plan area. Thus, 2,083 dwellings are already committed or predicted. In addition, further housing sites are allocated in the made Neighbourhood Plan. Economic growth is already committed in the made Neighbourhood Plan through the redevelopment, intensification and/or expansion of sites presently used for employment uses; the re-use and conversion of existing rural buildings; tourism and a new site on Land off Water Lane. For this reason, the strategic distribution of development at Farnham is already largely determined by commitments.

A number of brownfield sites have been promoted though a Call for Sites exercise conducted since the Neighbourhood Plan was made. One reasonable alternative could therefore involve maximising brownfield development sites with no development on greenfield sites located beyond the Built Up Area Boundary in the made Neighbourhood Plan.

Given the sites promoted for housing development, there are a number of greenfield sites beyond the Built Up Area Boundary of the made Neighbourhood Plan which could be allocated to meet the residual housing need of the Neighbourhood Plan Review. Locating



development on greenfield sites at the periphery of Farnham is another alternative development option.

Given the sites promoted for housing, there appears to be one broad location where all the residual new development could be clustered: to the north, east, west and/or south of Badshot Lea. This represents a third alternative focused on greenfield development around Badshot Lea with less emphasis on brownfield opportunities.

A range of alternatives associated with the preferred levels of growth therefore appear to be feasible in terms of distributing new development at Farnham:

**Alternative 3.1 - Maximise Farnham's brownfield development opportunities with no development on greenfield sites beyond the Built Up Area Boundary**

**Alternative 3.2 - Focus dispersed development on greenfield sites at the periphery of Farnham**

**Alternative 3.3 - Focus development in a single growth area of Badshot Lea**

### **Appraisal of Development Options**

It is necessary for the SA/ SEA to examine the impacts of each alternative to assist the Town Council in selecting the appropriate strategic distribution of development at Farnham. The alternatives are tested against the SA/ SEA objectives.

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Strategic distribution of development at Farnham Alternatives	Alternative 3.1 - Maximise Farnham's brownfield development opportunities with no development on greenfield sites beyond the Built Up Area Boundary	Alternative 3.2 - Focus dispersed development on greenfield sites at the periphery of Farnham	Alternative 3.3 Focus development in a single growth area of Badshot Lea
<b>SA/ SEA Objective</b>			
1 To ensure that everyone has the opportunity to live in a decent and affordable home of the appropriate size, type and tenure.	++	++	+
2 To protect, enhance and make accessible for enjoyment, the town's open spaces and high quality and sensitive landscape and prevent the coalescence of settlements.	++	--	--
3 To promote opportunities for employment within the Town and support Farnham town centre, local businesses and tourism.	++	+	+
4 To reduce the need to travel by car for local journeys, reduce road congestion, improve air quality and improve and promote travel by cycle and on foot within the Town.	+	--	--
5 To ensure adequate amenities for local residents, including health, education, local shopping and leisure facilities.	+	+	-
6 To conserve and enhance biodiversity and prevent any significant adverse effect on sites of national and international importance.	++	--	+
7 To ensure development complements the character of the town's individual neighbourhoods.	++	-	--
8 To maintain and improve the water quality of the Town's watercourses and to achieve sustainable water resources management.	?	?	?
9 To reduce and manage the risk of flooding and any consequential harmful impacts to public wellbeing, the local economy and the environment.	-	-	-
10 To increase energy efficiency and the proportion of energy generated from renewable sources in the Town and to utilize sustainably produced and local products in new developments where possible.	?	?	?
11 To reduce the Town's impact on climate change and prepare the community and environment for its impacts.	+	--	--
12 To conserve and enhance the historic environment, heritage assets and their settings and the distinctive built heritage of the area.	++	+	+

SCORE	DESCRIPTION	SYMBOL
Significant Positive Effect	The development alternative contributes significantly to the achievement of the objective	++
Minor Positive Effect	The development alternative contributes to the achievement of the objective but not significantly	+
Neutral	The development alternative does not have any effect on the achievement of the objective	0
Minor Negative Effect	The development alternative detracts from the achievement of the objective but not significantly	-
Significant Negative Effect	The development alternative detracts significantly from the achievement of the objective	--
No Relationship	There is no clear relationship between the development alternative and the achievement of the objective or the relationship is negligible	/
Uncertain	The effect on the objective is uncertain and subject to implementation	?

### Which is the most sustainable alternative?

Clearly all alternatives would have a positive effect on the delivery of housing development. This is likely to be significant in the case of Alternatives 3.1 and 3.2. Alternative 3.1 in particular would allow the use of higher densities within the urban area and close to the town centre with the opportunity to provide smaller units to help meet identified housing needs. Alternative 3.3 may be dependent on greater infrastructure investment and would be concentrated on a single area with a more limited range of locations, owners and developers to assist delivery. This may delay housing provision and therefore may be less likely to ensure the delivery of planned housing and therefore have a minor positive effect.

In relation to opportunities for employment, all options would bring short term benefits. Alternatives 3.1 would allow the redevelopment of brownfield sites within and with easy access to town centre sites. Alternatives 3.2 and 3.3 would mean development on peripheral sites more remote from the town centre and, in the case of Badshot Lea, a Neighbourhood Centre within the Plan area, and would therefore only have a minor positive effect on this objective.

By maximising brownfield development opportunities, Alternative 3.1 would have significant positive effects on protecting the town's open spaces, high quality and sensitive landscape; coalescence and biodiversity. The use of the town's brownfield sites would mean that there was the opportunity to be well related to existing amenities and facilities and the town and neighbourhood centres. This would help ensure minor positive benefits for the provision of amenities for local residents objective. As not all sites may enjoy the closest proximity to such facilities this alternative is likely to have a minor positive impact on reducing the need to travel by car. Maximising the use of brownfield sites should assist the assimilation of development within the already built up parts of the town and readily enables development to complement and potentially enhance the character of the town's individual neighbourhoods and/or the historic environment by replacing outmoded and in some cases unsightly development. This alternative would allow significant positive effects on these objectives. The recycling of brownfield land close to services and facilities with the opportunity for some landscaping should enable minor positive effects on the climate change and the travelling by sustainable means objectives.

Given that housing and development would be dispersed on greenfield sites at the edge of Farnham town, Alternative 3.2 potentially has significant negative effects on a range of environmental objectives including high quality and sensitive landscape; biodiversity and coalescence. The dispersed nature of development away from the town centre would result in poor accessibility to a range of modes of transport and longer journeys to amenities and the town and possibly neighbourhood centres resulting in significant negative impacts on reducing the need to travel by car and access to amenities. This, together with the potential use of sites which are partially within Flood Zone 3 would have potential significant negative effect on reducing the Town's impact on climate change. A dispersed development strategy around the edge of the town may have an adverse impact on the character of a neighbourhood but would be more likely to allow for the assimilation of development than a single growth point and therefore have only a minor negative effect on this objective.

The focus on a single growth area at Badshot Lea as presented in Alternative 3.3 would locate development at one of the furthest places from the town centre and railway station as well as the nearest neighbourhood centre within the Plan area. This would be likely to mean a significant negative effect on reduced car travel. In addition, the focus of almost all development in one location is likely to put significant pressure on amenities and consequently a potential need for investment in social and physical infrastructure. The range, scale and timing of such infrastructure, whilst retaining a viable development, may mean that this alternative would have a minor negative effect on this objective. Increased need to travel by car together with the use of sites which are partially within Flood Zone 3 would have potential significant negative effect on reducing the Town's impact on climate change. The clustering of almost all residual housing development into one of the town's distinctive areas would result in a development unable to complement the character of the area and consequently have a significant negative effect on this objective. Similarly, development would be likely to have an adverse impact on some sensitive landscapes or lead to the coalescence of settlements. Whilst containing some wildlife habitats, the area around Badshot Lea does not contain sites designated for their wildlife interest or BOAs and so there would be likely to be a minor positive effect on this objective.

All Alternatives may result in the use of sites which are partially within Flood Zone 3 and therefore all may have a minor negative effect on reducing and managing the risk of flooding.

In conclusion, Alternatives 3.2 and 3.3 have a number of significant and minor negative effects on most of the sustainability objectives whilst Alternative 3.1 is likely to have mostly significant or minor positive effects on these objectives.

For the reasons set out above, the preferred alternative for the strategic distribution of development at Farnham is to maximise Farnham's brownfield development opportunities with no development on greenfield sites beyond the Built Up Area Boundary.

## **Section 6: Sustainability Appraisal of Neighbourhood Plan Review Policies**

This section appraises the sustainability of each policy within the Regulation 14 Farnham Neighbourhood Plan Review. The matrices for each of the policies included in the Neighbourhood Plan Review can be found in Appendix 2 of the SA/ SEA and are summarised in the table below. The matrices for the sites not allocated in the Neighbourhood Plan Review are included in Appendix 3 of the SA/SEA.

There is no formal phasing of development proposed in the Neighbourhood Plan Review, so it is unlikely that the full cumulative effects would take place until towards the end of or even beyond the Plan period.

The Sustainability Appraisal is required to identify significant impacts of the Plan Review. Significant impacts are highlighted in the table in green (positive) and red (negative).

<b>SCORE</b>	<b>DESCRIPTION</b>	<b>SYMBOL</b>
Significant Positive Effect	The development alternative contributes significantly to the achievement of the objective	++
Minor Positive Effect	The development alternative contributes to the achievement of the objective but not significantly	+
Neutral	The development alternative does not have any effect on the achievement of the objective	0
Minor Negative Effect	The development alternative detracts from the achievement of the objective but not significantly	-
Significant Negative Effect	The development alternative detracts significantly from the achievement of the objective	--
No Relationship	There is no clear relationship between the development alternative and the achievement of the objective or the relationship is negligible	/
Uncertain	The effect on the objective is uncertain and subject to implementation	?

Neighbourhood Plan Review Policies		Sustainability Objectives											
		Homes	Landscape/ Open Space	Employment/Centres	Transport/Air Quality	Amenities	Biodiversity	Character	Water Resources/ Quality	Flooding	Energy Efficiency	Climate Change	Heritage
Environment	FNP1	+	+	+	+	0	+	++	++	++	0	+	++
	FNP2	?	+	+	+	0	+	++	+	+	?	+	++
	FNP3	0	0	+	0	0	0	++	0	0	0	0	++
	FNP4	0	0	+	0	0	0	++	0	0	0	0	++
	FNP5	?	+	+	+	0	+	++	0	0	?	+	++
	FNP6	?	+	+	+	0	+	++	0	0	?	+	++
	FNP7	?	+	+	+	0	+	++	0	0	?	+	++
	FNP8	?	+	0	+	0	+	++	+	+	0	+	++
	FNP9	0	0	+	0	0	0	++	0	0	0	0	++
	FNP10	-	++	+	+	+	++	+	+	+	0	+	++
	FNP11	-	++	?	+	?	+	+	+	+	0	+	0
	FNP12	0	++	+	+	+	++	0	+	+	0	+	+
	FNP13	?	++	+	+	+	++	+	+	+	0	+	+
Housing	FNP14a	++	+	0	?	?	+	+	?	0	?	?	0
	FNP14b	++	0	0	-	?	0	+	-	0	-	-	0
	FNP14c	+	0	0	-	?	0	+	-	0	-	-	0
	FNP14d	+	0	-	?	-	+	+	?	?	?	?	0
	FNP14e	+	0	-	?	+	+	++	?	0	?	?	++
	FNP14f	+	0	0	-	+	0	+	-	0	-	-	0
	FNP14g	++	0	0	-	?	0	+	-	0	-	-	0
	FNP14h	++	+	0	-	++	0	+	?	0	-	?	+
	FNP14i	++	+	+	?	++	0	+	?	0	-	?	+
	FNP14j	++	+	-	?	+	0	++	?	0	?	?	++
	FNP14k	+	0	-	?	+	0	+	?	0	?	?	0
	FNP14l	+	+	-	?	+	0	++	?	0	?	?	0
	FNP15	++	0	0	0	+	0	+	0	0	0	0	+
FNP16	+	0	+	0	+	0	++	0	0	0	0	++	
Employment	FNP17a	0	0	+	?	0	?	0	?	?	?	?	0
	FNP17b	0	?	++	-	0	?	0	?	?	-	?	0
	FNP17c	0	0	+	-	0	?	?	?	?	?	?	0
	FNP17d	0	0	+	-	0	?	?	?	?	?	?	0
	FNP17e	0	0	+	?	0	?	0	?	?	?	?	0
	FNP17f	0	0	+	0	0	0	0	0	0	0	0	0
	FNP17g	0	0	+	?	0	?	0	?	0	?	?	0
	FNP17h	0	0	+	?	0	?	0	?	?	?	?	0
	FNP17i	0	?	+	?	0	?	?	?	0	?	?	0
	FNP17j	0	0	+	?	0	?	0	?	?	?	?	0

	FNP17k	0	0	+	?	0	0	0	?	0	?	?	0
	FNP17l	0	0	+	?	0	0	0	?	0	?	?	0
	FNP17m	0	0	+	?	0	?	0	0	0	?	0	0
	FNP17n	0	?	+	?	0	0	0	0	0	?	?	0
	FNP17o	0	0	+	?	0	0	0	?	0	?	?	0
	FNP17p	0	0	+	?	0	?	0	0	0	?	?	0
	FNP17q	0	0	+	?	0	?	0	0	0	?	?	0
	FNP17r	0	0	+	?	0	?	0	?	?	?	?	0
	FNP17s	0	0	+	?	0	?	0	?	?	?	?	0
	FNP18	0	0	+	-	0	0	0	-	0	-	-	0
	FNP19	0	0	+	?	+	0	0	?	0	?	-	0
FNP20	?	?	+	?	+	?	+	?	?	?	?	?	
Town & Neighbourhood Centres	FNP21	+	+	++	+	+	0	++	0	0	+	+	++
	FNP22	++	+	++	+	+	0	++	0	0	+	+	++
	FNP23	?	0	++	+	++	0	++	0	0	+	+	++
	FNP24	0	0	++	+	++	0	++	0	0	+	+	+
	FNP25	0	0	+	+	+	0	+	0	0	+	+	+
Leisure	FNP26	0	++	0	?	+	+	+	+	+	?	+	+
	FNP27	0	++	+	+	++	+	+	+	+	?	+	+
	FNP28	0	0	+	+	+	0	+	0	0	+	+	0
	FNP29	0	0	+	+	+	0	+	0	0	+	+	+
Infra-structure	FNP30	0	+	+	++	+	+	+	?	?	+	+	+
	FNP31	0	0	?	0	+	+	0	++	?	0	+	0
	FNP32	0	+	+	+	+	+	?	?	?	+	+	?
Cumulative Impact		++	++	++	?	++	?	++	?	?	?	?	++

## Section 7: Conclusions

The **significant** effects of the Regulation 15 Neighbourhood Plan Review may be summarised as follows:

Overall, no cumulative negative impacts on Sustainability Objectives are predicted.

The policies in the Regulation 15 Neighbourhood Plan Review are expected to have a significant positive impact on the objective of providing decent and affordable homes of the appropriate size, type and tenure. The Plan Review includes 12 housing site allocations (some carried forward from the made Neighbourhood Plan) which together could provide approximately 922 new homes within and adjoining the built up area. The option selection process has included consideration of greenfield sites and the sustainability appraisal identifies the impacts of each. The Planning Strategy enables new housing development within the built up area boundary. Policy FNP12 seeks to ensure that small dwellings and homes for older people are constructed to meet identified need and FNP14(i) allocates land for student accommodation to serve the town's university.

A significant cumulative positive impact is predicted for landscape and open space. There is opportunity on existing brownfield sites to enhance the landscape when new proposals come forward. The landscape-dominated arcadian areas to the south of Farnham are protected. Outside the built up area, policy seeks to conserve and enhance the landscape and scenic beauty of the Surrey Hills Area of Outstanding Natural Beauty and its setting and to prevent a detrimental impact on areas of highest landscape value and sensitivity

and the historic, sensitive landscape of Old Park. New greenfield site allocations avoid such landscape and must be well integrated into the landscape by existing and new landscape buffers of appropriate native species as well as through sensitive designs. Policies also seek to retain the area's extensive green infrastructure and to ensure appropriate additional provision in association with development. .

A significant cumulative positive impact is anticipated in relation to promoting opportunities for employment and supporting town and neighbourhood centres. The policies relating to employment, leisure and wellbeing and town centres are all expected to have a positive impact on this objective and in addition the Regulation 14 Neighbourhood Plan Review proposes to retain, and where appropriate, intensify a range of employment premises on 19 sites which includes business parks and estates and smaller rural units. An allocation for a business site is made at Water Lane which would have a positive impact on employment but a more mixed impact on other objectives.

A significant cumulative positive impact is predicted on amenities/services. This is because the employment, town centres and leisure policies in particular will help to support a broad range of services and facilities in the Plan area. The environmental policies relating to landscape, biodiversity and SPAs will help to retain access to natural open space for the Town's residents.

A significant cumulative positive impact is expected in ensuring that development complements the character of the town's individual neighbourhoods. This is particularly due to the significant positive impact of some environmental and centres policies which should ensure that all new development responds to the built character and protects the landscape setting. The housing site allocations (Policy FNP14) and the business site allocation (Policy FNP18) are all accompanied by specific development guidance and in many cases bring the opportunity to enhance brownfield sites. The proposed redevelopment of East Street (Policy FNP21) and The Woolmead (Policy FNP22) would have a significant positive impact on the quality of Farnham town centre.

A significant cumulative positive impact is expected in conserve and enhance the historic environment, heritage assets and their settings and the distinctive built heritage of the area. This is particularly due to the significant positive impact of some environmental and centres policies which should ensure that all new development responds to local heritage. Some brownfield housing allocations are located within and adjoining conservation areas and listed buildings where enhancements are expected.

A number of the environment policies would have a significant positive impact on the landscape and open space and biodiversity objectives by protecting landscape, preventing the coalescence of settlements, providing SANGs and protecting and enhancing biodiversity value. In addition, Policy FNP20 seeks to protect open space. There is always an inherent tension in protecting landscape and open space and providing sufficient housing to meet identified needs, but the environment policies, together with Waverley Local Plan environment policies, should help to ensure that any future development protects valued landscape and open space.

The environment policy on design and conservation (Policy FNP1) would have a significant positive impact on character, water quality and flooding objectives. The transport policy (Policy FNP30) would have a significant positive impact on the sustainability of transport and air quality.

Taken as a whole, the policies of the Plan Review have no net negative impact.



This Sustainability Appraisal/ Strategic Environmental Assessment Non Technical Summary has been prepared on behalf of Farnham Town Council by

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