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Dear Tom

Farnham Town Council Neighbourhood Plan Review. Regulation 15 submission.

At the meeting of full Council last night, the Regulation 15 Farnham Neighbourhood Plan was agreed for submission to Waverley Borough Council. As you know, the review took place to provide the additional 450 homes added to Farnham's housing requirement during the Local Plan Part 1 process. The Neighbourhood Plan Review therefore includes new housing allocations.

We have taken this opportunity to harmonise the end date of the Neighbourhood Plan with the end date of the Local Plan period at 2032. We have also adjusted the Built Up Area Boundary to reflect those sites granted on appeal since the Neighbourhood Plan 2017 was made; included specific reference to SANG sites to support the new housing and incorporated minor text revisions to ensure consistency within the Plan and to bring the plan up to date. The Plan is in general conformity with the adopted Local Plan Part 1, takes account of the National Planning Policy Framework, 2018 and accords with the Conservation of Habitats and Species and Planning Regulations 2018 issued on 28th December 2018 which included the amendment to the prescribed basic condition. I have attached a list of the main changes between the made Neighbourhood Plan 2017 and this Regulation 15 Neighbourhood Plan 2019 following the Review.

I attach the relevant documents required to accompany the regulation 15 submission but there is a raft of additional evidence available on the Town Council's website at www.farnham.gov.uk/services/neighbourhood-plan/neighbourhood-plan-regulation-15-2019.

The documents attached are:

- 1) The designation map and statement which identifies the Farnham Neighbourhood Plan area.
- 2) A copy of the made Farnham Neighbourhood Plan 2017
- 3) A copy of the Regulation 15 Farnham Neighbourhood Plan 2019
- 4) Farnham Neighbourhood Plan Review Sustainability Appraisal 2018

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- 5) Farnham Neighbourhood Plan Review Sustainability Appraisal/Strategic Environmental Assessment – non-technical summary 2018
- 6) The Consultation Statement 2018
- 7) The Basic Conditions Statement (explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act)
- 8) Habitats Regulation Assessment/ Appropriate Assessment, January 2019

In addition, we have attached some specific evidence prepared to underpin this Review including:

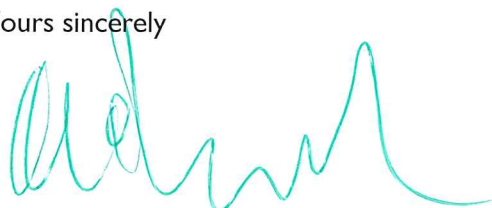
- 1) Landscape Character Area Assessment, 2018
- 2) European Special Protection Areas and Suitable Alternative Natural Greenspace, 2019
- 3) Farnham Housing Land Availability Assessment (FHLAA) December 2018
- 4) Student Accommodation, December 2018

Farnham Town Council has also resolved that the modifications/changes in this Regulation 15 version are neither significant nor substantial and do not change the nature of the plan.

Farnham Town Council is grateful for the assurance that the start of the Regulation 16 consultation can proceed without delay. We hope that an Independent Examiner can now be appointed formally to commence work as soon as the Regulation 16 consultation period is concluded. For consistency purposes and because he has detailed knowledge of the area and the made Neighbourhood Plan from his previous Independent Examination we would support the appointment of Derek Stebbing of IPE for this next Examination.

If there are any queries, please let me know.

Yours sincerely



Iain Lynch
Town Clerk

**Farnham Neighbourhood Plan Review 2019
Minor (non-material) updates
to the Made Farnham Neighbourhood Plan 2017**

I Planning process

Introduction, Para 2 Explains that the Review is taking place primarily in response to the additional 450 dwellings to be provided at Farnham as a result of the adopted Waverley Local Plan.- Part I.

Figure 2 - Involvement in the Neighbourhood Plan Process - sets out the process involved in formulating the Review.

The Review is supported by an updated Sustainability Appraisal (and non technical summary), a Consultation Statement and the following evidence in addition to the evidence prepared for the made Neighbourhood Plan:

- Farnham Housing Land Availability Assessment (FHLAA), December 2018
- Farnham Landscape Character Assessment, July 2018
- SANG, July 2018
- Farnham Student Accommodation, December 2018
- Habitats Regulation Assessment/ Appropriate Assessment, January 2019
- Regulation 14 Consultation feedback and responses
 - Developer Submissions (Large documents – Available on request)
 - Responses to Landowner Developer Submissions, December 2018

2 Planning Strategy

- The Planning Strategy for the area remains the same.
- The Plan period is extended to 2032 to align with the adopted Local Plan.
- The Built Up Area Boundary remains the same other than an extension around other than two extensions to incorporate planning consents granted on appeal after the Neighbourhood Plan was made (see Map A).

3 Neighbourhood Plan Policies

The Neighbourhood Plan Review contains no new policies and none have been deleted.

Waverley Abbey Conservation Area

Page 32 - There is more text about Waverley Abbey Conservation Area which was inadvertently omitted in the Made NP.

Areas of High Landscape Value and Sensitivity

Map E is amended to show revised Areas of High Landscape Value and Sensitivity based on the Farnham Landscape Character Assessment, July 2018.

Suitable Alternative Natural Greenspace (SANG)

The European Special Protection Areas section updates the remaining SANG capacity at Farnham Park and includes the new SANG sites available at Tongham Road, Runfold and the Runfold South Quarry Site.

Policy FNPI2 Thames Basin Heaths Special Protection Area (SPA) and new Map G references the two new SANG sites.

Housing

The Housing Requirement section sets out the revised target of a minimum of 2780 new homes in Farnham (including homes permitted and built since April 2013 and anticipated windfall development) in the period 2013 - 2032. This is an additional requirement of 450 dwellings over the Made Neighbourhood Plan.

The Housing Supply section updates the housing supply to a base date of 31 March 2018. In order to help meet the identified additional housing requirement, Policy FNPI4 allocates five new housing sites. All sites are within the Built Up Area Boundary of the made Neighbourhood Plan are brownfield sites, many being close to the town centre.

- Cobgates, Falkner Road (Gross Area: 0.55ha. Approximate density: 75dph. Approximate capacity: 40 dwellings).
- University for the Creative Arts, Falkner Road (Gross Area: 2.05ha. Approximate capacity: 252 student units (217 net additional student units). (This equates to 72 dwellings)
- Centrum Business Park, East Street (Gross Area: 0.7ha. Approximate density: 215 dph. Approximate capacity: 150 dwellings)
- Kimbers Lane (Gross Area: 0.24ha. Approximate density: 85dph. Approximate capacity: 20 dwellings)
- Surrey Sawmill, Wrecclisham Hill (Gross Area: 0.7ha. Approximate density: 30dph. Approximate capacity: 20 dwellings)

The Review sets out development guidance on Design and Layout; Landscape; Access and infrastructure for each site.

The total housing provision over the plan period summarised in the Review in an updated table:

	Net Dwellings
Sites which have already been completed (in the period 2013/14 – 2017/18)	445
Large sites with planning permission at 31 March 2018	851
Large site with planning permission granted full planning consent on appeal after 31 March 2018: Land west of Folly Hill, Folly Hill (WA/2016/1224)	96
Additional housing capacity from Neighbourhood Plan housing allocations granted full planning consent after 31 March 2018:	
• Western portion of Policy FNPI4 c) Land at Little Acres Nursery and south of Badshot Lea (WA/2018/0329 for 94 dwellings superseding WA/2015/1935 for 80 dwellings)	14
• Policy FNPI4 h) The Woolmead (WA/2018/0458 for 138 dwellings superseding WA/2015/2387 for 96 dwellings)	42
• Garden Style Nursery, Wrecclisham Hill, Wrecclisham (WA/2017/1778 for 72 dwellings superseding WA/2015/2163 for 65 dwellings) ¹	7
Small sites with planning permission at 31 March 2018	153
Windfall contribution	475
Allocations	922
Total	3,005

¹ Has resolution to permit but no decision notice issued

There is a new section on Student Accommodation to explain the new halls of residence at the University for the Creative Arts and how this will contribute to the Farnham housing supply.

Business

Policy FNPI7 Land for Business no longer protects Surrey Sawmills as a business site as it is now proposed to be allocated as a housing site. It is understood the business is already looking to relocate and that the nature of the business can be suitably located nearby.

Leisure and Wellbeing

There is a slight increase in the need for open space as a consequence of additional housing but this does not have any consequential impact on site allocations other than that incorporated within the design guidance for certain housing sites

Infrastructure

The Infrastructure section makes it clear that the consultation on the draft Neighbourhood Plan Review with service providers was used to assess the implications of additional housing on existing infrastructure and services.

Reasons

- The Neighbourhood Plan Review has increased housing provision to ensure that it is up to date and generally conforms with the strategic housing requirement of the Waverley Local Plan – Part 1 which was adopted in February 2018 after the Farnham Neighbourhood Plan was made. The adopted Local Plan notes that the additional housing required in Farnham of at least 2780 dwellings will be made through Local Plan Part 2 or an early review of the Neighbourhood Plan.
- The Neighbourhood Plan Review has assessed with infrastructure providers any ancillary infrastructure needs which arise from the additional housing requirement and has consequently increased the open space requirements and ensured reference to SANG provision.
- The Neighbourhood Plan has incorporated minor factual text and map updates and changes to reflect what has happened and permissions granted since the made Neighbourhood Plan 2017 was prepared and adopted.
- The end date of the Plan period has been harmonised with the Waverley Local Plan for consistency.

Note on the Nature of the Changes

In accordance with Neighbourhood Planning Guidance, the Town Council needs to take a view on the changes and whether they are so substantial as to change the nature of the Plan and give reasons. Where modifications do not change the nature of the plan and the Planning Authority and Independent Examiner agree, a referendum is not required.

How are these changes regarded by Farnham Town Council?

Council determined prior to the Regulation 14 Consultation that the changes proposed were minor and non-material and did not change the nature of the Plan. The changes which have been made since the Regulation 14 Neighbourhood Plan (including the deletion of two potential housing site options) has not changed this view.