

FARNHAM NEIGHBOURHOOD PLAN

REPRESENTATIONS ON BEHALF OF COVE HOMES

LAND AT MONKTON LANE

1. Cove has submitted Regulation 14 submissions (authored by Pegasus Planning) and Regulation 16 submissions in respect of the Farnham Neighbourhood Plan (“FNP”), submitted to Waverley Borough Council (“WBC”), as a modification proposal in January 2019.
2. This is an additional Statement provided following the Examiner’s invitation of 4 September 2019, Annex 3. It addresses various new evidence on housing land supply and the implications of that, for the assessment of the FNP against the basic conditions under paragraph 8(2)(a), (d) and (e) of Schedule 4B of the Town and Country Planning Act (“TCPA”) and under the following three Agenda Items:

Agenda Item 3: The Proposed Plan-Period & Housing Land Supply

Agenda Item 4: Farnham Built-Up Area Boundary

Agenda Item 5: Policy FNP14

Housing Land Supply Position

3. The results of the first Housing Delivery Test, published on February 2019. This confirmed WBC’s result as 79%. WBC have therefore failed the HDT in 2018, with the resultant immediate need to apply a 20% buffer onto their five-year housing land supply calculation.
4. WBC purport to have a housing land supply of 5.20 years within the ‘Five Year Housing Land Supply Position Statement as at 1 April 2019’. However, this position has been rejected by an Inspector in Appeal decision APP/R3650/W/19/3227970: Land to the south of Cox Green Road, Rudgwick, Surrey, which was issued on 16 September 2019.
5. The Inspector discounted a significant number of sites from WBC’s calculations (Paragraphs 12 – 24) and concluded:

“With the necessary deductions that I have identified, totalling 928 units, the Council’s deliverable supply is reduced to 4,780. Against the agreed requirement figure of 5,501 units, this amounts to a supply of around 4.3 years.”

Agenda Item 3: The Proposed Plan Period & Housing Land Supply

6. The proposed re-calculation of housing land supply at 5.132-5.142 is identified as 2,083 dwellings. This supply is simply not sufficient to meet housing needs up to 2032.
7. The FNP has been submitted at a time when WBC are preparing a new Local Plan, which will be assessed against the NPPF 2019 (February 2019), requiring a further uplift in housing land supply (notably to address the current deficit).

8. Farnham is the largest, most sustainable and least constrained settlements in the Borough. Therefore, it is highly likely that any additional housing requirement will be directed towards the settlement.
9. The Neighbourhood plan itself contains no 'housing requirement figure' compatible with NPPF 2019 paragraphs 65 and 66, as this has not been assessed in the context of a Local Plan adopted under the new NPPF era. Notwithstanding NPPF (2019) paragraph 214, this is an important factor.
10. Accordingly, the review of the Neighbourhood Plan should either be delayed, or a greater number of sites should be allocated to meet the anticipated shortfall.

Agenda Item 4: Farnham Built-Up Area Boundary

11. The housing land supply situation has further implications for the BUAB.
12. As for the amendments to the settlement boundary, as set out previously, the new boundary should include land at Monkton Lane. In addition to the suitability of the site for development we have also set out in our earlier submissions the concerns relating to:
 - The absence of a landscape evidence base
 - The Inspector's identification of an absence of any unacceptable landscape harm
 - The Secretary of State's Decision Letter not having addressed this issue.
13. For the above reasons we consider the BUAB therefore does not meet the basic conditions because:
 - It serves to constrain land that is otherwise sustainable – breach conditions 8(2)(a) and (d)
 - It has not been drawn up on the basis of a robust evidence base, contrary to the PPG and thus basic condition 8(2)(a)
 - It is already out of date in light of the acknowledged issues with housing land supply across the Borough, activating NPPF 11d
 - The plan contains no indicative housing requirement figure, sufficient to meet the requirements of NPPF 14b and 65/66.

Agenda Item 5: Policy FNP14

14. Whilst, no objection is made to the specific sites allocated under FNP14, for the reasons set out above, however this does not form a sufficient supply of housing within the neighbourhood area for the plan period.

Summary

15. It is evident from the representations made that a number of interested parties were not formally notified of the publication and associated consultation period in respect of the

review of the FNP and thus there have been procedural defects in respect of the preparation of this document which may well have dissuaded members of the public from participating in the consultation. Cove concurs with those submission, notably those submitted initially by GL Hearn on behalf of Wates Development.

16. For all of these issues, it is respectfully submitted that the correct route would be to determine that the plan has not met the basic conditions and should not proceed to referendum.