

Mr Graham Parrott  
Planning Policy Manager  
Waverley Borough Council  
Council Offices  
The Burys  
Godalming  
Surrey  
GU7 1HR

**Iain Lynch**  
Town Clerk  
Telephone: 01252 712667  
(Calls may be monitored or recorded)  
E-mail: [town.clerk@farnham.gov.uk](mailto:town.clerk@farnham.gov.uk)  
10<sup>th</sup> January 2014

Dear Graham

**Town and Parish Consultation: The New Waverley Local Plan (December 2013)**

Thank you for the opportunity to contribute to your important work on site allocations in the borough. I would note that due to the time constraints imposed, this response has been compiled under delegated responsibilities. Therefore the content of this response is draft until it is considered by full council on 23<sup>rd</sup> January 2014. Any additions or amendments will be passed on to you by 24<sup>th</sup> January, as per the response deadline for members of the public.

As you know, Waverley approved Farnham Town Council's application for the designation of the Farnham Neighbourhood Plan area in February 2013 and the Town Council has been working with residents and businesses on a Neighbourhood Plan for the town over several months.

Residents appreciate the need to follow the broad strategic aims in Waverley's planning documents and there has been general agreement so far on the amount and location of new housing.

Development in Farnham is, of course, constrained by the demands of the Habitats Regulations. We have taken advice from Nicolette Pike from Bell Cornwell on our obligations under the law and she has advised us that there is a duty on Waverley Borough Council to protect the integrity of both the Thames Basin Heaths and Wealden Heaths Special Protection Areas by directing development away from the SPAs, where possible. A copy of the commissioned advice received from Nicolette Pike LLB(Hons), of Bell Cornwall Solicitors is attached to this letter at Appendix I.

The Town Council, in response to residents' considered views, is willing to accept that Farnham needs to take a substantial number of houses on brown-field sites within the town but, is unwilling to see release of any green-field sites on the outskirts of the town, while brown-field sites are available elsewhere in the borough.

If future development is to be permitted on green-field sites, developers will have to provide SANGS appropriate to, and in advance of, each development. The Neighbourhood Planning Team has sought and discussed further SANGS provision with local people, but has found no available land within the town boundary.



## **Existing SHLAA Sites**

Residents have studied all the sites in the latest SHLAA documents and have challenged certain sites and supported others. Views provided to the Town Council throughout the process of creating a Neighbourhood Plan are set out below. I would note that these views are set to be tested by a preferred options survey, which is subject to consultation with all households in Farnham throughout January and February 2014.

### **SHLAA ID25/26**

The Badshot Lea Community Associations has surveyed all of its residents and the results of that survey and full case are attached at Appendix 2 to this letter. The residents of Badshot Lea village have clearly identified the area, a green-field site, which they would prefer to see developed, if green-field release were to be necessary in the future. The piece of land being referred to lies between Little Acres nursery and St. George's Road and provides a natural link with the recreation ground and the community centre at The Kiln.

Residents have indicated in workshops that they would accept a development of no more than 200 homes on the chosen site and development here would need to provide its own SANGS.

Through the work of the Neighbourhood Plan, residents also requested that any development in Badshot Lea should involve the local community and that consideration be given to the enhancement of the land currently known as the Strategic Gap, as a direct result of any large development. The opinions of the local people who have commented so far are set to be tested via a town wide survey on preferred options for the Neighbourhood Plan.

### **SHLAA ID29**

The other site, which residents have indicated would be acceptable for development in the future, is some of the land near Coxbridge Farm. It has been suggested that development here should be restricted to around 200 dwellings and that buffer zone should be imposed, to protect the amenity of nearby residents in Coxbridge Meadow. Once again, developers of this site will have to provide sufficient SANGS, before permission can be given.

### **SHLAA ID573**

The North-West Farnham Residents' Association has presented a petition to Farnham Town Council for the retention of the Hop Fields on Beavers Road as a green space. Their case is attached this this letter at appendix 3.

### **SHLAA ID332**

South Farnham Residents' Association has also prepared a comprehensive and evidence-based document, to seek the protection of Compton Fields and this is attached at appendix 4.

## **New Sites**

Rowledge Residents' Association has put forward its case to the Neighbourhood Planning Team, against all the SHLAA sites on the outskirts of the village, but has offered a case for development elsewhere in Rowledge. It is understood that Rowledge Residents' Association will be forwarding their suggested housing site submissions to you directly and the Town Council is yet to discuss this submission and therefore it has not formed a view on it at this time.

The Town Council is also aware of a submission being sent to you in relation to land at Runfold. These submissions have not yet been considered by full council at Farnham Town Council.

## **Employment Land**

Guildford Road has a mix of uses but much of the land is inefficient in its current use. There has been a suggestion made that low-level industrial uses could be encouraged to move to the edge of town or to rural brown-field sites, which would render more land available for residential use within the town centre.

## **Farnham Town Council**

Council Offices, South Street, Farnham, Surrey, GU9 7RN  
Tel: 01252 712667 Fax: 01252 718309 Email: [info@farnham.gov.uk](mailto:info@farnham.gov.uk)  
[www.farnham.gov.uk](http://www.farnham.gov.uk)



A more cohesive approach to employment land has been requested by residents. Much of the employment space in the town is small-scale and limited by its situation and there is a shortage of modern office space with good communications and adequate parking. There has also been an increase in retail provision on business parks, which they feel has a detrimental effect on the town centre and should not be encouraged. The Town Council is mindful of the need to ensure the retention of a range of services to meet the needs of the community.

The Town Council considers that Farnham could accommodate the 434 houses on green-field sites, as imposed by the Borough Council's withdrawn Core Strategy. This would be providing that the integrity of the two Special Protection Areas was maintained. The Town Council would point out that any additional green-field release would, of course, require additional SANGS provision which is yet to be identified.

In addition to looking at housing numbers, the Neighbourhood Planning Team has looked at employment uses within the town. There is currently an over-supply of office space in the town centre, much of which is being converted for residential use.

Finally, the residents, through Neighbourhood Planning consultation have queried infrastructure and the road system in and around the town and its ability to cope with the large numbers of houses proposed both in Waverley and in its neighbouring boroughs. Recent traffic counts have confirmed that the roads around Farnham are already the busiest in the borough. Around eight thousand houses are proposed in Whitehill/Bordon and Aldershot alone and traffic from these developments will use the local roads. No major improvements are planned for roads or the rail service and the level crossing at the station continues to restrict the flow of traffic both in the town and along the by-pass.

It is hoped that the borough council will take these comments on board in its efforts to create a new Local Plan for Waverley and that continued consultation and support can be shared between Waverley and the Town and Parish Councils.

Yours sincerely



**Iain Lynch**