

## Correspondence with Natural England

**RE: Farnham Neighbourhood Plan**

**Date:**

09/12/2016 08:43:20 GMT Standard Time

**From:**

[Marc.Turner@naturalengland.org.uk](mailto:Marc.Turner@naturalengland.org.uk)

**To:**

[TonyFullwoodRTPI@aol.com](mailto:TonyFullwoodRTPI@aol.com)

Dear Tony,

Thank you for your email and your update. I can confirm that I see this as a relatively minor amendment to the neighbourhood plan and thus not a material change in circumstance to warrant update of either the Sustainability Appraisal or the Habitats Regulations Assessment. Ultimately the SPA is still protected and likely significant effects continue to be screened out.

I have read through the four page document you have sent through to me with suggested amendments. I can confirm that Natural England are comfortable with the changes and have no comments to make.

Kind Regards

Marc

Marc Turner

Senior Adviser

Sustainable Development  
Thames Team

2nd Floor

Cromwell House

15 Andover Road

Winchester

SO23 7BT

Direct Dial: 02080267686

[www.gov.uk/government/organisations/natural-england](http://www.gov.uk/government/organisations/natural-england)

**Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.**

**These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

**From:** TonyFullwoodRTPI@aol.com [mailto:TonyFullwoodRTPI@aol.com]  
**Sent:** 08 December 2016 20:00  
**To:** Turner, Marc (NE)  
**Subject:** Farnham Neighbourhood Plan

Dear Marc

I wanted to update you on the progress of the Farnham Neighbourhood Plan. As you know, the Neighbourhood Plan has reached the Examination stage.

When we were last in touch in July, the Neighbourhood Plan was expected to result in a total of 2248 dwellings. Of this number, 963 dwellings were already committed (completions and planning consents) at 31 March 2016 and had therefore already been accounted for in terms of SANG. This left a requirement for 1285 dwellings beyond 31 March 2016. (Ultimately the numbers in the published plan varied from these figures very slightly). This SANG capacity was based on the Thames Basin Heaths Special Protection Area Avoidance Strategy Review 2016 which confirms the unallocated capacity (February 2016) of 1,462 dwellings based on revised occupancy levels of 1.99 ppd. The Strategy (para 5.16) states that this method of re-assessment has been verified by Natural England and represents a significant increase in the amount of SANG available as an avoidance measure.

In August 2016 the Borough Council produced a SANG Topic Paper to accompany the Local Plan and confirms that at current monitored levels of residential occupancy of 1.98 persons per dwelling, the unallocated (enhanced) SANG capacity at Farnham Park was 1,370 dwellings (at 1 April 2016). Once again, the Topic Paper reiterates that this method of re-assessment has been verified by Natural England and represents a significant increase in the amount of SANG available at Farnham Park as an avoidance measure.

The table below indicates the most up to date projected SANG capacity requirement of 1217 dwellings from the Neighbourhood Plan for housing not already taken into account at 1 April 2016.

<b>Source of Housing Supply</b>	<b>Net Dwellings</b>
Further Reg 14 Neighbourhood Plan housing site allocation granted consent (Garden Style, Wrecclesham)	65
Windfall contribution	378 <sup>[1]</sup>
Housing Allocations	774 <sup>[2]</sup>
<b>Total</b>	<b>1217</b>

Once again, the Neighbourhood Plan's housing provision remains within the SANG capacity at current occupancy rates

Neighbourhood Plan Policy FNP15 seeks the provision of smaller dwellings but clearly if the average occupancy of dwellings does rise in Farnham there is some tolerance in this capacity before additional SANG would be required.

As you are aware, the Neighbourhood Plan allocates land at Coxbridge Farm (Policy FNP14(i)) for approximately 350 dwellings. The site promoters have indicated that the effects of their development could be mitigated through the provision of 'bespoke' SANG, either on- or off-site. Other suitable sites may seek this option during the plan period and developers may offer their own bespoke solution to

---

[1] In reality some of the windfall sites in Farnham will be located outside the SPA 5 km buffer zone and this number represents the maximum number of dwellings from this source requiring SANG.

[2] Capacity of Allocation Sites as updated at the Examination (784 dwellings) minus Policy FNP14(g) West of Switchback Lane (10 dwellings) which will not rely on the capacity of the Farnham Park SANG as it is located outside the SPA 5 km buffer zone.

mitigate against any adverse effects on the Thames Basin Heaths SPA. Such mitigation measures will clearly need to be agreed by Natural England. As a contingency for higher occupancy levels, it is proposed that Neighbourhood Plan Policy FNP12 be revised to make a more explicit reference to bespoke SANG (the policy already refers to the standards which a bespoke SANG would need to meet but does not make specific reference to bespoke SANG):

Waverley Borough Council also made it clear at the Examination that they were actively pursuing land for additional SANG should this be required for later in the Plan period.

I attach a copy of the proposed revised Neighbourhood Plan text and policy.

The Examiner has requested that Natural England review the updated position set out above and comment on the proposed revised policy.

In addition, it would be helpful to understand whether Natural England would see a need to reconsider the Sustainability Appraisal on the basis of the revised policy.

Finally, it would be helpful to have the view from Natural England on whether the revised policy would be likely to change the conclusions of the HRA that no likely significant effects are expected to the eight Natura 2000 sites and one Ramsar site within 20km of Farnham as result of the revised text and Policy.

The Examiner has set a tight deadline for these comments and I would be grateful for a prompt reply.

Best regards

Tony Fullwood