

SCHEDULE OF RESPONSES TO PUBLIC CONSULTATION 8TH JUNE TO 20 JULY 2009

REF	DATE	RESPONDENT	ISSUES
1	undated	(anonymous)	Objection. Avoidance Strategy not suitable. Queries why Farnham Park being used. Should be a strategy about excessive housing development.
2	05/06/2009	Pavillion Housing Association	Response to come
3	05/06/2009	Turley Associates	Response to come
4	05/06/2009	Home Builders Federation	Objection. Understood that the planning system was to safeguard the countryside for recreation. The agencies don't seem to want people in the countryside.
5	05/06/2009	JDL Project Management	No comments
6	05/06/2009	David Ryland	Objection. Agrees with HBF. Just another example of ill conceived legislation
7	08/06/2009	Robert Gillespie	Objection. Cites a case in Windermere of controlling visitors to the National Park
8	08/06/2009	Chris Lacey	(Consultation diverted)
9	08/06/2009	Planning Inspectorate	Inquiring about the capacity of the SANG allocation
10	08/06/2009	Development Planning Services	Agrees that the Avoidance Strategy is the right approach. A hierarchy of sites is needed. Haven't identified any other sites. Agrees the tariff for SANG but not for Natural England. Press ahead.
11	09/06/2009	Strategic Planning Advise	Response to come
12	09/06/2009	Jim McAllister	Suggests use of 350 acres as SANG at Dunsfold
13	09/06/2009	Bellway Homes Ltd	Support. Welcomes the Avoidance Strategy and agrees it is the right approach. Agrees identified sites and the tariff, but not the extra tariff for the work of Natural England in the SPA
14	10/06/2009	Flavia Estates	Support. Agrees that the Avoidance Strategy is the right approach. Considers that the Park should continue to be used as SANG. Land to the east of the Park, the water meadows and the Blackwater Valley could be used, but not the Farnham Quarry, Riverside and land south of the bypass, Bourne Woods or Alice Holt. The tariff is agreed but not the extra tariff for Natural England. Capacity should be reviewed in the light of falling dog ownership.
15	10/06/2009	Planning Inspectorate	Inspectorate advised of the Avoidance Strategy
16	12/06/2009	Philip Design Associates	Objection. Considers Avoidance Strategy is not the right approach. The SPA was introduced without consultation and measures should have been introduced beforehand. The Avoidance Strategy has resulted in a virtual halt to planning permission in the 5 km zone, and has almost bankrupted the firm. No proper assessment of how the policy (the Avoidance Strategy) is affecting the SPA and local SANG. The increased dog walking in Farnham Park has put extra pressure on the wildlife in the Park. Developers do not object to paying a tariff as long as it is proportionate and reasonable. Natural England should itself fund work in the SPA.
17	17/06/2009	Mr S Smith	Objection. Where is the evidence that the Farnham Park SANG has taken any pressure off the SPA? The infrastructure cannot cope with more development that would result from the Avoidance Strategy. There is no commitment to support the principle of "local decisions by local people". Commitment to protecting Waverley Lane and South Farnham. Developers want to make money - who should the local council and government be listening to.

18	17/06/2009	Gail Kyle	Priority must be given to building outside the 5km zone in accordance with the SE Plan. SANG doesn't attract people from the SPA. The Local Plan doesn't protect the residential areas from over development such as over priced flats. The Avoidance Strategy will increase more garden grabbing, the Council is putting the interests of developers before residents. The Miniplan gave permission for 567 dwellings in 2 years more than the target for the whole of Waverley. The park will be urbanised.
19	17/06/2009	Mrs A Smith	Objection. Farnham is already congested and cannot keep on bringing more residents and blocks of expensive flats. No proof that Farnham Park is taking away pressures from the heath and it cant be proved. Cant keep putting more and more people into a finite space without pressure on the infrastructure and environment.
20	17/06/2009	Carmel Dolan	Objects to the Avoidance Strategy. Permission given for 567 dwellings in Farnham, twice the housing target. Flats are inappropriate, what is needed is houses for families. Some houses in south Farnham have been demolished for flats, such as in Shortheath Road. The Local Plan does not protect the residential areas, and the infrastructure cannot cope. Waverley is putting the interests of developers before residents. There will be more garden grabbing. The Park will become more urbanised.
21	18/06/2009	Margaret Grant	Strongly objects to the Avoidance Strategy. Any more development will change the treasured place for ever. The new housing is not affordable homes for families, and they will add to the already overloaded infrastructure. Constantly trying to stem the tide of traffic parking overflow schools. More people will take away the environment, a pleasant place to live, parks to relax in, and the little wildlife left.
22	18/06/2009	Mr and Mrs Paris	Objection. The Local Plan does not protect unique residential areas from over development. Flats have been built at the expense of lovely houses of character in original plots, such areas need protection. There is not the infrastructure to cope with more development. Rail and public transport is poor. The Avoidance Strategy will generate more garden grabbing and Waverley is putting the interests of developers before residents. Developers can build outside the 5km zone. As a result of the miniplan 567 houses were granted in 2 years, more than the target for the whole of Waverley. Any alternative site for SANG would have the same result for Farnham.
P36			Policy is wrong because it conflicts with SE Plan Policy NMR6 "Priority should be given to directing development to those areas where potential adverse effects can be avoided without need for mitigation measures." Waverley does not have to provide mitigation it is the responsibility of developers. Housing should be outside the 5km zone, as was the view of the inspector at the previous Core Strategy at the Examination in Public (this did not take place). Object to the statement on the website that the updated plan is designed to continue to protect rare birds - not proven.
23	18/06/2009	Mr and Mrs DH Cooper	Objection. Developers can build outside the 5km zone. No scientific evidence that the Park attracts people from the SPA. The Local Plan does not protect unique residential areas. Development has been high priced flats at the expense of houses of character. The infrastructure cannot cope. Rail and public transport is poor. There will be more garden grabbing. The east access to the Park is unsuitable. There is no proposal to protect the SPA. Waverley is putting the developers before residents. 567 dwellings in 2 years, more than the target for the whole of Waverley
24	19/06/2009	Helen Webber	Objects to the idea of using Farnham Park to offset surrounding heath use. Dog walkers will use the area nearest to them. The Park will be damaged by increased use because the pond /waterway system is vulnerable to pollution and over use and there are newt colonies, protected by law. The archaeological sites can be damaged by an increase in use and other wildlife suffer when there is too much disturbance. There is an area of chalk downland which is just as sensitive as heathland. There are already problems from the existing number of users.
25	19/06/2009	Chris Hunter	Doesn't agree with the Avoidance Strategy. Housing should only be outside Zones A and B.
26	19/06/2009	Max Lyons	Objects to new extended proposals. With the Park as a SANG it is overfunded. New building in the surrounding areas needs to be much more strictly controlled, then there would not be a need for an Avoidance Strategy.
27	19/06/2009	Art Bay Ltd	Objection. The area south of the railway station is saturated with traffic due to building. The schools are oversubscribed and further housing will result in further demands for schools parking and other facilities. Constantly get involved in traffic jams. The additional housing, including East Street will create further congestion and overloading of the infrastructure.
28	19/06/2009	Trevor Larking	

			Object to the extension of the Avoidance Strategy. Where is the evidence that the first designation (of the Park as SANG) has worked? Farnham cannot cope with a further increase in population. There is no spare capacity in the schools, the roads are jammed, pollution levels are dangerously high and there is no western bypass. The town is bifurcated, so the argument that the Park will attract walkers from the south is even more specious. Is Waverley turning a blind eye to traffic because it is the concern of SCC?
29	19/06/2009	Eric Dorling	Objects to the proposed Avoidance Strategy
30	19/06/2009	Holdthatthought	Objection. The EU directive states that there must be no new development within 5 km of heathland. The infrastructure cannot cope. It is difficult to find places in schools. There are traffic problems and public transport is poor. The SE Plan did not expect any of the targets to be met within the 5km zone. There have been 567 dwellings in 2 years more than the target for the whole of Waverley and many have been high priced flats not affordable houses. The character of the Park should not be changed nor the historic character of Farnham. The Council is putting developers before residents.
31	20/06/2009	Jenny Johnson	Objection to the Avoidance Strategy, which builds on the Mimiplan. Developers should be directed to build outside the 5km zone to support rural communities. No evidence that the SANG attracts people from the SPA. The Local Plan does not protect the unique character of residential areas from overdevelopment which has been mainly high priced flats at the expense of larger houses of character, such as the Borelli and Falkner legacy. The infrastructure cannot cope. There is no protection for the SPA itself. The SE Plan stated that it did not expect targets to be met within the 5km zone. The Park will be urbanised. Any alternative SANG will mean the same result for Farnham.
32	20/06/2009	Michael Sweeting	Objection. Huge concern about building further houses in South Farnham. Already feeling the effects of overdevelopment. There is over demand for parking at the station. Already being ruined for example The Ridgeway. Roads are congested and schools do not have the facility to accept more pupils.
33	21/06/2009	John Bowden	Objection. Build outside the 5km zone. No evidence that the SANG attracts people from the SPA. The Local Plan does not protect the unique character of the residential areas. Development over the last 2 years has been high priced flats at the expense of houses of character. The infrastructure cannot cope. Public transport is poor. There will be more garden grabbing. The proposed eastern access is unsuitable. There is no proposal to protect the SPA. Waverley is putting developers before residents. Developers can build outside the 5km zone. The SE Plan stated it did not expect any housing targets to be met in the 5km zone. 567 dwelling have been built in 2 years more than the target for the whole of Waverley. The Park will be urbanised. Any alternative SANG will mean the same for Farnham.
			Objection. (As above)
34	21/06/2009	Alison Molan	Objection. The Avoidance Strategy is probably the only approach to avoiding adverse impact on the SPA. Any of the suggested alternative SANG would be acceptable. Haven't identified any other areas. Developers will have to pay the tariff but under no circumstances should they pay any fees to Natural England. The whole business of the SPA is quite unacceptable, but Waverley has done its best to mitigate the problem and are to be congratulated.
35	22/06/2009	Michael Molan	Objection. (As for Alison Molan)
36	22/06/2009	MJ Coomber Associates	Objection. The proposals will increase the number of inappropriate flats in a gardened town already losing its character. Resources should be dedicated to development for families. There are already objections to flats so why waste resources on the Avoidance Strategy.
37	22/06/2009	David Davies	Objection. 567 new houses in 20 months, which is twice the annual housing target for the whole of Waverley, and are mainly luxury flats not affordable homes. Large family homes have been demolished and there is garden grabbing taking place, both leading to changes in the character of Farnham.
38	22/06/2009	Charlie Killen	Objection. The proposed SANG won't have any bearing on the SPA. The development this would make way for in South Farnham is not matched by the infrastructure required to support an increased population. No justification for allowing further development in the 5km zone. Scope exists outside without the Avoidance Strategy.
39	23/06/2009	John Trillwood	Objection. Opposed the Mimiplan and 567 houses were allowed. This new increase would allow 800 houses. The additional population would threaten the heaths. Changes in Farnham Park will not protect the heaths, it would just spoil another piece of natural Farnham. Increases in housing are pressurising the services. Traffic has increased and schools are overcrowded. There is garden grabbing and replacement of family homes by flats. Homes for first time buyers are needed. The Local Plan 2002 should be updated.
40	24/06/2009	Peter Thomazin	
41	26/06/2009	Dr P Lambert	

42	30/06/2009	Bourne Residents Association	Objection. Could find no scientific paper that justifies the case for SANG, and therefore it is rejected and dismiss any extension of the policy and the proposal that there should be a tariff for the work of Natural England. Concerned about the expense of public money.
43	29/06/2009	South Alliance Investments	May need to seek consent for conversion of offices in West Street to three one bed flats. Willing to pay the tariff.
44	30/06/2009	The Farnham Trust.	Objection. Does not believe the Avoidance Strategy is the right approach because of the damaging effect on the Park. The use of the Park as SANG is a form of commercial exploitation which is a threat to its integrity and character. The Avoidance Strategy will lead to high density residential development in South Farnham, leading to the loss of family houses and spacious gardens and their replacement with high density units and flats. This would result in damage to the character of the area, a considerable net increase in population and would affect the Park. The Park must be protected from high density use. There are already restrictions on the SPA and there will be redirection of visitors to the Park. The Avoidance Strategy focuses on the Park as SANG. The other option are dismissed or long term. The SE Plan NRM6 states "Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures." Cites the Waverley Farnham Park Management Plan and a 1991 document by the Trust.
45	01/07/2009	John Birch	Objection. A large part of South Farnham is affected by the policy but the residents do not go to the SPA or the Park. They go to the countryside to the south. They avoid the bypass. The distance to the SPA ought to be journey time. The problem is compounded by eliminating the three zones. Waverley does not have to consult Natural England on applications in the zone. The two zones means that applications in Hale and the Bourne are treated the same way. A large proportion of the SANG is accounted for by East Street, which is frustrating small schemes. If it doesn't go ahead the reserved allocation is particularly unfair on smaller developers. Supports the Avoidance Strategy if Council deals with applications more than 4km away on their merits. All the alternative sites are suitable. Suggests land to the west of Wrecclesham Recreation Ground. Developers should pay the tariff.
46	01/07/2009	Christopher Bean	Objection. Does not agree with the Avoidance Strategy. It has not been established that there is public support for building in the 5km zone. WBC has no obligation to provide mitigation or avoidance. Intensification of the Park would be damaging. The consultation is premature because WBC has not completed or consulted on the Strategic Housing Land Availability Assessment.
47	02/06/2009	Charles Stuart	Objection. Further flats and houses in South Farnham will run contrary to all the residents needs, who should control decisions. Traffic is already at blockage point. Garden grabbing is a massive problem, the essential character is gradually being eroded. The SE Plan stated that it did not envisage any targets to be met within the 5km zone. The Miniplan allowed over 500 dwellings in 2 years. Opening up to 800 dwellings is unfair. There is no evidence that the SANG attracts people away from the SPA. Building should be outside the 5km zone. The Park should not be urbanised
48	02/07/2009	Dr J Huddleston	Support. SPA has to be defended SANG seems sensible. Park should be made a nature reserve. Bourne Woods a no go as an alternative site. Quarry seems least spoilaible. Developers should pay for SANGs works and refund SPA costs to Natural England. SANGs facilities should be severely minimal.
49	02/07/2009	Derek Dunton	Objects strongly. Farnham being targeted by developers and 567 dwellings have been approved in 2 years. The SANG is just a means of allowing more houses and the Park is being abused for this purpose. The infrastructure will be unable to support the increased population, garden grabbing will continue.
50	02/07/2009	Fand M Davies.	Objection. Opposed to WBC effort to circumvent EU Regulations by seeking to increase use of the Park, and find it too busy already, so people will go to the very areas being persuade to avoid. Don't agree with the Avoidance Strategy let the developers do their own legwork. Alternative sites not suitable. Developers should pay the tariff and the extra tariff to Natural England. WBC should not be involved in this exercise.
51	03/07/2009	Mrs S Watson	Objection. No further building should be allowed within the 5km zone. The SE Plan did not expect any of the targets to be met within the 5km zone. There is no proposal to protect the SPA. Adding to the SANG will make the Park urbanised. There is no evidence that the Park attracts people from the SPA. The proposed eastern access is unsuitable. Any alternative site would mean the same result for Farnham. 567 dwellings have been approved in 2 years. This is twice the housing target for the whole of Waverley and they have been high priced flats at the expense of housing of character. The infrastructure cannot cope and public transport is poor.

52	04/07/2009	J and D Thorpe	<p>Objection. There is no legal requirement for the Council to provide alternative green space, it is the obligation of the developer. Alternative sites should be sought throughout the Borough. The whole issue needs to be reconsidered.</p> <p>Strongly object to using Farnham Park as a SANG to allow developers with WBC support to continue building houses in the area. The EU Directive requires an Appropriate Assessment for development that would have an impact on the SPA. What is the status of development where there has been no AA. How could Natural England give support without the AAs. Independent consultants should have been used to decide if mitigation measures are acceptable. EU legislation requires that new recreational land be used. Farnham Park has always been accessible to the general public. Improving the car parks does not constitute the provision of new recreational space. Non compliance with the Directive would open WBC to legal challenge. Developers are responsible for mitigation measures but WBC has to ensure that the appropriate legislated requirements are met before planning approval is given. Mitigation measures require a cumulative approach and have to take account of all developments that have been completed since the Directive was introduced.</p>
53	06/07/2009	P and P Marriott	<p>Objection. Do not agree with the Avoidance Strategy. The provision of mitigation is not the responsibility of WBC it is the responsibility of the developer. Do not agree with the alternative sites or the two tariffs. The consultation is premature as WBC has not yet consulted the public on its proposed future housing development.</p>
54	06/07/2009	Castle Street Residents Assoc	<p>Objection. Twice the number of houses for Waverley have been granted in 20 months so there is no more room. There are more appeals waiting. The Tifford and Waverley (Lane) are blocked and town centre. The services are overstretched. Why does Farnham require more housing, the people of Farnham do not. Why does WBC persist in trying to cram more houses into Farnham?</p>
55	06/07/2009	CW and BA Wicks	<p>Objection. Do not agree with Avoidance Strategy. Regional policy says developers should be offered areas where unwanted effects don't require mitigation. In January 2008 the Waverley barrister said at an inquiry that WBC had already met its housing targets for quite a few years. The Avoidance Strategy will encourage garden grabbing. WBC has not shown that Farnham Park has received more dog walkers, so could be in contempt of the EU law. The park should be left to birds, newts and casual walkers. The quarry is likely to suffer least from being a SANG and may benefit. (Regarding other possible SANG) has WBC shown that a SANG is inescapable - where is the evidence- where is the Strategic Housing Land Availability Assessment. Agrees with the tariff. Developers should pay for infrastructure and the tariff for Natural England. An excessive house building quota is being unfairly imposed on Farnham</p>
56	06/07/2009	D and J Huddleston	<p>Objection. Does not agree with the Avoidance Strategy. Provision of mitigation is the responsibility of the developer. WBC has no legal responsibility to provide mitigation and should not assist developers to build in the 5km zone. Does not agree with the tariff for mitigation. The consultation is inappropriate and premature. It assumes that WBC has already decided that Farnham can accommodate at least 540 houses within the 5kmzone, although it has yet to complete and consult on a Strategic Housing Land Assessment.</p>
57	06/07/2009	Christine Bean	<p>Objection. WBC has not set out what recreational uses it intends to foster in the Park - is it to be a recreational centre? The proposed developments of areas contiguous with the Park such as in Rushmoor have not been taken into account and these will increase the use and stress on the Park. WBC has not evaluated the impact that the current SANG designation has had on the Park or how it has protected the SPA. All development in the greater Farnham area should be frozen until WBC has analysed these issues.</p>
58	09/07/2009	Derek Wilson	<p>Objection. Does not agree with Avoidance Strategy. The provision of mitigation is the responsibility of the developer. All the proposed alternative sites should be protected from development. Has not identified other SANG which should be done by an environment study. Does not agree with the tariffs as disagrees with the principle. The consultation is premature and has been conducted in a vacuum without reference to other options in the Borough which should be considered first.</p>
59	07/07/2009	J Langdeil	<p>Support. Agrees with the Avoidance Strategy. All the (proposed) SANG should be assessed for suitability. Proposes the army land north of Upper Hale as SANG. Agrees both tariffs. Farnham is an attractive location for development and there is not enough property to satisfy the demand. The pace of development cannot be sustained. WBC must limit new development through planning control and tariffs etc.</p>
60	09/07/2009	Dudley Feather	<p>Objection. The Miniplan and the Avoidance Strategy are not sufficient to guarantee the protection of the SPA. Have the measures worked so far? Was there an increase in visitors to the park? How many visitors were there before the plans? Do you know for certain that any increase in visitors reflected the same people who would otherwise have visited the SPA? What has happened to the protected bird species? How will nominating an eastern car park encourage more people to use the Park - those people that would otherwise use the SPA? WBC is acting in contravention of the SE Plan</p>
61	09/07/2009	Pamela Pownall	

62	09/07/2009	Ted Bonner	<p>Objection. The Avoidance Strategy is not the right approach. Provision of mitigation is responsibility of the developers. Waverley Borough Council has no legal responsibility to provide it. Assent to assisting developers has not been established. Doesn't agree with alternatives or Avoidance Strategy in principle. Doesn't agree WBC should provide SANG. Consultation is premature and is based on assumption that distribution of housing has been determined without reference to other options.</p>
63	09/07/2009	South Farnham Resid. Assoc.	<p>Objection. Waverley Borough Council is contravening the SE Plan. There is plenty of opportunity for development outside the protected (5km)zone. Reference to Policy SP3 of the SE Plan. Farnham has to absorb 567 dwellings which is equivalent to two and a quarter years of Waverley's housing requirement. Town suffers pollution, traffic congestion, inadequate public transport, doctors and dentists overstretched, schools at capacity, children may have to go to Camberley to school. Not in line with sustainable development.</p>
64	09/07/2009	Andrew Millet	<p>Objection. Since April 2007, permission given for 567 houses in Farnham, more than twice the requirement for the whole of Waverley. Can the Council prove that there has been a significant increase in the number of visitors to the Park who would otherwise have gone to the heathland? If not no logical reason for new residents to go there, rather than the heaths.</p>
65	10/07/2009	David Graham	<p>Objection. There is no obligation on Waverley Borough Council to provide an Avoidance Strategy. It is up to developers to provide SANG. Disagrees with both tariffs - should follow policy and not allow further development within the 5km zone. No legal obligation on WBC to provide an Avoidance Strategy to benefit developers. No evidence that people will use the Park in preference to the SPA because of signing and additional parking. No scientific evidence of the capacity of the Park. It is not suddenly alternative green space. Waverley should stop seeking to avoid the aims of the Directive and start behaving as a responsible LA. WBC is putting the future of the Park at risk overdeveloping Farnham and doing next to nothing to protect the SPA.</p>
66	10/07/2009	Mrs AC Graham	<p>Objection. The Avoidance Strategy is not the right approach and Waverley Borough Council need not provide it. It is for developers to provide. Waverley Borough Council should not provide SANG and therefore disagrees with both the tariffs. The consultation is premature since WBC has not completed its SHLAA.</p>
67	10/07/2009	KS Johnson	<p>Objection. The Park was given by Farnham Urban Council for the enjoyment of the people of Farnham. It is an ancient deer Park with much history attached. Does not want to see it hijacked and urbanised by the addition of special pathways signage and car parks. Looks to WBC to protect the Park not to sacrifice it.</p>
68	10/07/2009	Tim Cox	<p>Objection. SANG availability and capacity firstly needs to be looked at on a sub regional basis in the context of the SE Plan. The actual demands on Farnham for housing need to be in the context of a Core Strategy, which would spell out the distribution of housing across the Borough. The Avoidance strategy is a device without a local planning context. The best way of protecting the heaths is to accept the minimum of essential development within the 5km catchment. Only if there are no viable alternatives elsewhere and some capacity would have to be found in the 5km zone should an Avoidance Strategy be developed. This is the approach of Regional Policy NRM6. In 2006 the Core Strategy failed on a similar point. The question of the alternative SANG or any other sites is premature. Agrees with both the tariffs once the need for a SANG has been established. Concerned that it is proceeding in advance of the Core strategy and the SHLAA. To do it this way opens the LPA to the charge that it is facilitating development with developer interests paramount as the amount of SANG available will determine the expectation.</p>
69	10/07/2009	Robert Verner-Jeffreys	<p>Objection. The Avoidance Strategy is unnecessary, undesirable and misconceived. It is not the Council's job to produce SANG or an Avoidance Strategy, they should come from a developer. Because of use of the Park as a play area about 1200 extra people are living here in 20 months. Want no more expensive flats and gardens filled with rabbit hutches. The roads, surgeries, water, and sewerage, schools and hospital can take no more. Why not more cheaper homes in the villages and is the Dunsfold project not going ahead? Re the 5km zone is the Council talking to Rushmoor about what is happening in Church Crookham and Aldershot. The Park has been recognised by English Heritage. Let it be maintained and not urbanised.</p>

70	10/07/2009	Virginia Immergluck	<p>Objection. The Avoidance Strategy is not the right approach. It is the responsibility of the developer not the Council. Disagrees in principle and therefore with the alternative SANGs. The consultation is premature and is being conducted without reference to other options in the Borough which should be considered first.</p> <p>Support (qualified). Agrees that for the moment the Avoidance Strategy is the right approach, but the intended reduced impact on the SPA and the intended increased visitor pressure on the Park need to be monitored. It is an SNCI and is important for Great Crested Newts and deadwood for invertebrates. An up to date ecological survey is needed. (Re other possible SANG), parts of Farnham Quarry would be suitable but not the water meadows which flood and may be of wildlife interest and are part of the River Wey corridor and may be adjacent to a SNCI. Developers should pay the tariff for the SANG and these should be financed in perpetuity. Does not agree with the tariff for the SPA. The reduced visitor pressure should reduce the costs of maintenance. There should be a management plan for the SPAs and regular monitoring.</p>
71	10/07/2009	Judy Sauter (Surrey Wildlife Trust)	<p>Objection. Cites Policy NRM6. WBC should produce a SHLAA. No explanation of the need to allow further housing development prior to an Area Action Plan for traffic which should be a priority. The Avoidance Strategy dismisses most of the potential sites for SANG - was this to persuade the public that the Park has to be the choice? The Park's status and history should not be abused by its use for dog walkers at the expense of the wider public. Asking about other possible sites is an inappropriate question. Does not support either tariff. Consultation inappropriate at this time as there is no consultation on the sites, numbers and allocation of homes, nor is there a schedule of specific deliverable sites for the next five years. There is no answer yet from the Inspector on Dunsfold.</p>
72	11/07/2009	Celia Sanders	<p>Objection. Farnham is only 10% of Waverley and it is unreasonable that such a large % of Waverley's proposed development is to be placed in and around Farnham, it is disproportionate. There is still plenty of opportunity outside the protected zone. The Council is contravening regional policies. Policy SP3 of the SE Plan requires SHLAAs to identify the scope of development. 567 houses are to be absorbed in the next few years - two years worth of Waverley's entire housing requirement. There will be an ever increasing and intolerable strain on the infrastructure. Cites pollution, road congestion, medical services overstretched, schools working at capacity and children may have to go to school in Camberley. This is not sustainable development.</p>
P41 73	11/07/2009	Stoneyfields East Reside. Assoc	<p>Objection. Policy NRM6 of the SE Plan states that priority should be given to directing development to those areas where mitigation will not be needed, so why is the Council doing this when it has been told to build houses outside the restricted area? Has the Council carried out a SHLAA? Did the Miniplan work to the Council's satisfaction? Did more people use the Park and would the extra visitors have gone otherwise to the SPA? Has the Council checked the bird population to see if the plan worked? Farnham will soon feel the impact of the permissions given over the last few years, and the impact on services will be great without further new housing. Many of the permissions have been for expensive flats that are not required which are a waste of valuable SANG. In the last 20 months there has been permission for 567 new dwellings, just over 2 1/4 times Waverley's entire new housing allocation for a year.</p>
74	11/07/2009	MJ Gardener	<p>Objection. Does not agree with the Avoidance Strategy approach. By going out to consultation is pre-empting the SHLAA. Cites Regional Policy NRM6. Guildford Borough is challenging the SE Plan housing allocation - WBC should explain why it is not. WBC seeking to sanction the approved 567 dwellings without regard to the constraints of an inadequate infrastructure, which is causing congestion and air pollution for which no Area Action Plans have been put forward. Does "continued use of Farnham Park" mean the whole 21.25ha? The Miniplan introduced an element of urbanisation to the Park which will increase if an additional area is added. Disingenuous to invite comment on alternative areas when the document makes clear that most of the sites are unsuitable. Does not understand why the public have been asked if they can identify any other possible SANG. If the policy on SANG is to be adopted would want to see a clear protocol and full accountability for the tariffs. The consultation has generated a widespread view that WBC is primarily concerned with enabling further development in advance of</p>
75	11/07/2009	Richard Sanders	<p>proper housing assessments. Farnham has already taken its fair share of housing, taking East Street into account which has not started. WBC would appear open to legitimate challenge by other developers who are in a position to build. Could this be germane to WBC's apparent willingness to short circuit the normal cycle of policy development with the premature consultation? Dunsfold decision still awaited.</p>
		(Continued)	

76	12/07/2009	Kenneth Faircloth	<p>Objection. Wishes to protest about the proposals for an expansion of housing in Farnham. Whilst the need for housing must be widely accepted to place it in an already congested area without considerable expansion of services seems crass. It will reduce the quality of life in an already congested and polluted town.</p> <p>Objection. Waverley Borough Council is under no obligation to provide mitigation. The priority is to build outside of the 5km zone. Local infrastructure cannot cope and the traffic congestion is notorious. The eastern access car park is half a mile from the SANGs of which 350 yards is along the busy Hale Road. The car park is already used by St John's parishioners. There is not proposal to protect the SPA and the SE Plan stated it did not expect any of the housing targets to be met within the 5km zone. By adding paths signage and car parks Farnham Park will be urbanised.</p>
77	12/07/2009	R Lovell	<p>Strong objection. WBC has no legal obligation to create a mitigation plan. A handy way to get money to "improve" the Park? A SANG is not a workable project and exchanging the SPA for SANGs is horsetrading. Has WBC got proof that SANG works and draws people away from the SPA before embarking on another SANG? The Park does not need to be changed which means becoming more urbanised. The provision of an Avoidance Strategy should be left to the developer. There is no proposal to protect the SPA. The EU Directive states that there must be no new developments within 5km. Therefore building should be outside the 5km zone as stated in the SE Plan. Why is WBC falling over backwards to build as many houses as possible in Farnham, more than the target for the whole of Waverley. Most of the housing is inappropriate, should be for families and first time buyers. WBC is putting the interests of developers before the residents. Concern for wildlife not a WBC concern.</p>
78	12/07/2009	Merete Hall	<p>Objection. Does not agree with the Avoidance Strategy. Assumption that the public will use the SANG and avoid the SPA. Visitors relish the wildness of the heaths, but the Park is much more managed; as pressure increases on the Park less people will visit it; SANG relative to the 5m restriction are being concentrated on but there is the Wealden Heaths SPA near Farnham and providing SANG for the Thames Basin Heaths could be seen as moving the problem to another area which is protected under the Directive; what assessment has been undertaken by WBC that the proposed housing is required. Could WBC challenge the allocation like Guildford? Queries the water meadows, Farnham Quarry and Bourne Woods as inappropriate for SANG. Does not agree with the developer's tariff but supports the Natural England tariff. East Street will make an significant impact on infrastructure. Water resources area already tight. Will be interested to see the outcome of the SHLAA</p>
P42			
79	12/07/2009	Lisa Malcolm	<p>Objection. The WBC stance in the Avoidance Strategy is seriously flawed. That the Park can continue to be "improved" to provide more "access" to dog walkers so that developers can provide homes that Farnham people don't want or afford seems nonsensical. The Park is used by local people living on the perimeter. To attract more dog walkers means people driving across town and from further afield adding to current traffic problems and poor air quality. There is no obligation on WBC to provide SANGs it is the responsibility of the developers, so why desecrate the natural parkland. Suggest SANGs in other parts of the Borough. Almost all the housing requirement for the Borough being provided by East Street. How about Godalming, Cranleigh, Dunsfold and Haslemere sharing the load. Do not provide more SANG which will slow down development in a town with huge traffic problems, and no will from WBC or SCC to solve them.</p>
80	13/07/2009	Lesley Lovell	<p>Objection. Does not agree with the approach of the Avoidance Strategy. Dog owners from Fleet, Crookham and Aldershot will not bypass the SPA to go to Farnham Park. The plan to improve the access to the eastern end of the Park will oblige people to walk a quarter of a mile before they reach the Park. There should be no more houses built in Central Farnham within 5km of the SPA just as the Regulations say. Suitable housing sites exist elsewhere and SANG should only be used where there is no alternative. Don't agree with the two tariffs because does not agree with SANG. A ruse to push the bulk of Waverley's housing quota onto Farnham. Infrastructure is short: upper schools increasing class numbers; roads cannot cope; sewage farm cannot cope.</p>
81	13/07/2009	Jac Slim	

82	13/07/2009	Roy Sharpe (Continued)	<p>Objection. The individual comments made in the 2007 consultation were glossed over. Waverley Borough Council planners do not enjoy the confidence of Farnham residents. A small panel of Members should see all the submissions so they can also provide an informed view. As a user of the Park, there has not been any increased usage of the Park since the Miniplan. Isn't this an EU stipulation? an increase in signage paths and car parks will render it less likely to be used by countryside users and distract from the long loved character of the Park, which importance is recognised by English Heritage. The establishment of the Lodge and ranger should not be dependent on developer contributions. The infrastructure can't cope with any more intensive development. Immediately to mind are highways, public transport, schools, pollution and major relief road implementation. Not all the houses approved since the Miniplan have been built so the full effect cannot be realised. The SE Plan did not expect the housing target to be met in the 5km zone.</p> <p>Developers should investigate land outside the 5km zone. The questionnaire is biased.</p> <p>Objection. Was the walkers survey of the Park been carried out for the Miniplan? A further survey needs to be carried out. Did the plan work? Would the people using the Park have previously used the SPA? Has the usage of the Park increased since the implementation of the Miniplan. What has it done to the bird population of the SPA? Has the condition of the Park deteriorated? These questions should be answered before more land is released in the Park. Why the emphasis on development in Farnham. Consent has been given for 567 dwellings - twice Waverley's allocation for a year. Having met the allocation why continue giving permission for more dwellings when the infrastructure cant support them. The SE Plan Policy NRM6 when dealing with the SPA states priority should be given to directing development to areas where mitigation is not needed. Development should be directed outside the 5km zone. With the effort to obtain more mitigation land in Farnham when there are other parts of the Borough and when the Directive is that these alternatives should be pursued, is there some sort of conspiracy. taking place?</p>
83	13/07/2009	Pamela Woodwood	<p>Objection. No further building should be allowed within the 5km zone. The SE Plan did not expect any of the targets to be met within the 5km zone. There is no proposal to protect the SPA. Adding to the SANG will make the Park urbanised. There is no evidence that the Park attracts people from the SPA. The proposed eastern access is unsuitable. Any alternative site would mean the same result for Farnham. 567 dwellings have been approved in 2 years. This is twice the housing target for the whole of Waverley and they have been high priced flats at the expense of housing of character. The infrastructure cannot cope and public transport is poor. There is no spare capacity in local schools, the roads are clogged, pollution is dangerously high and there is no western bypass.</p>
P43			
84	13/07/2009	J Watson	Objection. With regard to WBC's proposed creation of 500+ homes Farnham is full. Look elsewhere.
85	13/07/2009	Ian Stevenson	Objection. Oppose any measure that will allow excessive development in Farnham. Already have a chronic shortage of secondary school places. More building will mean more pressure on the two local schools that are already cracking at the seams. When applied last year was offered a school 10 miles away.
86	13/07/2008	Fiona Conoley	Objection. The Avoidance Strategy is not the right approach so do not agree with the alternative SANGs or the tariffs. Too early for public consultation as the location and distribution of housing allocated to WBC in the SE Plan has not yet been decided on. The consultation paper assumes that 540 houses within the 5km zone have been agreed. WBC has not published or consulted the public with a schedule on the sites to deliver housing.
87	13/07/2009	Hugh Batchelor	Objection. Avoidance Strategy merely undermines existing schemes for protecting land in Farnham. There must be smarter ways to address housing shortages in Waverley.
88	13/07/2009	Tim Hewitt.	Objection: No evidence of SANGs being successful or change in footfall in SPA or the Park since the introduction of the original strategy. Without justification it is not acceptable to continue with this strategy. It is a fundamental duty of WBC to uphold the EU Directive, but there is no evidence of this. SE Plan requires priority to be given to development outside the protective zone, but there is no document from WBC describing these areas or priorities. The original Avoidance Strategy has resulted in over 500 houses in 20 months, more than double Waverley's housing allocation. Questions why a further Avoidance Strategy is needed at this time. The pre-requisite for the extension to the SANGs is the parking on the east side of the Park. The use of the layby stretches the notion of adequate parking too far and the idea of dogs using the Upper Hale Road and Hale Road is an accident waiting to happen. What would Waverley's liability be. Dedicating parts of the Park would be similar to a restrictive covenant. What rights does Waverley have?
89	13/07/2009	Derrick Price	

90	13/07/2009	Alan Lovell (Councillor WBC)	<p>The questions are not the right ones. WBC should not automatically provide a new SANGs area to facilitate development in Farnham. The primary responsibility should rest with developers. The fact that the present SANG allocation has been used up so fast demonstrates that development in this part of the Borough is proceeding far too quickly in this congested town. No need to act swiftly to allow even more development to proceed. The Park has done its bit and any further SANGs should be elsewhere. Prefers the creation of new public open space (eg the Farnham sand gravel pit) where developers contributions would create a new facility. Opposes the attempt to "improve" the Park people prefer it as it is. Ridiculous to try and attract new users to the Park when 70% are expected to drive there.</p> <p>Objection. Why mitigate the building restrictions that apply with the EU Directive which covers the Farnham area? WBC has to face up to the terrible consequences of the Miniplan in that nearly 600 permissions have been given for houses. There is still East Street to deal with. Farnham is already overdeveloped. The SANGs proposals will open up the opportunity for WBC to allow developers to build what and where they want. There is a total set of problems that there is no related Strategic Plan to ensure the infrastructure is going to be appropriate. Traffic roads, parking schools, medical facilities are already inadequate. The Farnham environment is very precious do not destroy it. Why not find other areas of the Borough that can sustain such development plans.</p>
91	13/07/09	Dr Eric Buesnel	<p>Objection. What is important to the association is maintaining the right balance between the Park as a natural greenspace with its own wildlife and its current and projected use as a leisure facility. The consultation does not spell out what would be done in the Park if a further 10.35 ha were to be SANG. Significant urbanisation would be viewed unfavourably. The Quarry has much in its favour.</p>
92	14/07/2009	Park View Residents Assoc.	<p>Objection. Does not agree that the Avoidance Strategy is the right approach. The Council should not be seeking ways to allow overdevelopment to continue. The alternative areas (SANG) have their own special qualities and wildlife that would be under threat if they have more intensive use. Identifying more SANG is not the issue, which is the overdevelopment of Farnham. Developers should pay both tariffs but they just add the cost to the price of the properties so in effect the developer does not pay. The heaths are under threat from over development in the area so prohibit it. The Council says all will be OK if developers pay monies to be used at other locations. This suggests new residents will refrain from using the heaths but walk at the alternative locations, but then these areas would be under greater pressure and the locations and wildlife would suffer..</p>
93	14/07/2009	Chris Davies	<p>Strongest possible objection to the Avoidance Strategy because it is premature, inappropriate, seriously flawed and a complete waste of council tax payers money. Disagrees that the Avoidance Strategy is the right approach. Not demonstrated that any amount of mitigation by providing SANG within the Park will avoid adverse impact on the SPA. An Environmental Impact Assessment is needed to establish the facts before any further work otherwise the entire exercise is meaningless and irrelevant. Government policy to prevent further residential development within the 5km zone. 562 dwellings were permitted in first 2 years of the 20 year plan to 2026. 460 were required by Government from April 2007 to March 2009 for the whole of Waverley, so the figure approved for Farnham was excessively and disproportionately high and significantly exceeds the number required for the whole of the 20 year period if the housing requirement was met in an evenly distributed way across the whole of the Borough. The allocation can be met outside the 5km zone. Traffic and pollution problems an inadequate road network, schools are over subscribed' there are inadequate road network, schools are over subscribed' there are concerns on waste management, water supply pollution and other infrastructure strains. Appendix 1 is missing which could invalidate anyone's opinion who wishes to agree with the Avoidance Strategy. Needs to be in accordance with Policy NRM6 and an assessment made - if it is not made, then it should not be possible to permit development in the SPA 5km zone. The 5000 houses allocation from the SE Panel is based on the assumption that they will be located outside the 5km zone. Mitigation proposals should be demonstrated to be effective by an independent assessment. Until then the precautionary principle should apply. Cannot judge the alternative SANGs. Does not agree with either tariff. WBC should concentrate efforts on areas outside Farnham.</p>
94	14/07/2009	Anthony Goodall	

95	14/07/2009	AD, KF, L.J, Feather and C Connolly	Objection. WBC is contravening the SE Plan. Farnham is only about 10% of Waverley and the area affected by the SPA is only a small part of Farnham. There is opportunity for development outside the protected zone. Reference to (the SE Plan) policy SP3 where the Council is asked to use SHLAA to identify the scope for redevelopment. Farnham is absorbing 567 dwellings, an equivalent to 2 1/4 years worth of WB entire new housing requirement, putting an intolerable strain on the infrastructure. There is high pollution, congested roads, public transport is inadequate, dentists and doctors are overstretched, schools are working at capacity and children are threatened with having to go to Camberley for education. This is not in line with sustainable development.
96	14/07/2009	Eand R Hoyes	Objection. (See No 170) Objection. The SPA is to be protected. Waverley Borough Council should build outside the 5km zone, not affecting developer's business. The infrastructure cannot cope. Schools dental practices and doctor's surgeries are full, and the station has inadequate parking and the Bordon Ecotown will put more pressure on the station. The SE Plan did not expect targets to be met within the 5km zone. No evidence that the SANGs attracts people from the SPA, an EU stipulation, and until WBC can provide evidence no mitigation should be permitted.
97	14/07/2009	Zofia Lovell.	Objection. Disturbed that Waverley Borough Council appears to take for granted the fact that further development will take place within the 5km zone. Why is Waverley Borough Council canvassing views before asking whether further development in this protected area is wanted. Raised questions: is the Avoidance Strategy based on a Housing Land Availability Assessment (SHLAA) and is it available? Does the SHLAA demonstrate it is not possible to accommodate the 5,000 within WB outside the 5km zone? is the need for the Avoidance Strategy based on an identified 5years supply of specific deliverable housing sites within WB? Will WBC provide for the public details of the 5 years deliverable housing sites planned for the 5km zone? Why does the community need an Avoidance Strategy at this time?
98	14/07/2009	Sue Bryan	Objection. The Avoidance Strategy is aimed at allowing more housing in Farnham which would be a grave mistake. There is not the infrastructure: people cant get their children into local schools, or get an NHS dentist, the roads are log jammed and people are driven out of Farnham by traffic and parking problems; pollution is above danger levels. WBC should be addressing these problems not adding to them. Developers have already done damage to the town via the existing Miniplan with their flats and garden grabbing. The allocation of the 5000 houses to WB was on the assumption that all the houses would be built outside the 5 km zone. The development options for the Core Strategy need to be published.
P45			
99	14/07/2009	Michael Culham	Strong objection to building 500-800 houses in the 5 km zone. Farnham already suffering from over development with large schemes such as East Street and severe garden grabbing. There is a substantial increase in population and cars and additional dwellings would be a further colossal burden to the already overstretched and crucial infrastructure. The rush to get round the EU Regulations will lead to a further deterioration in and around the town. Further development could be outside the 5km zone as indicated by the SE Plan. Classifying the Park as a SANG has no validity as there is no scientific or impact assessment. WBC is siding with the developers.
100	15/07/2009	BR Marshall	Objection. The Avoidance Strategy is the wrong approach. Should not build in the EU stipulated 5km zone. Re potential SANG, creation of any would give the green light to developers in an already saturated area. The infrastructure cannot cope, eg the sewage works. Not aware of any scientific evidence that the Park attracted people away from the SPA. Has a scientific assessment been carried out and what species did it cover? Does not agree that any new SANG should be created. Agrees with both tariffs. Avoidance Strategy contains the same elements as the Miniplan criticised by the Inspector in 2006. Will WBC give an unequivocal assurance that the current Avoidance Strategy will be robust and not found unsound against Test vii?
101	15/07/2009	Jonny Bryan	Strong objection. Farnham covers 10% of the Borough but houses 1/3 of the population. 567 new dwellings have been afforded by the SANG in 20 months which is equivalent to more than twice Waverley's new housing allocation. The impact on the infrastructure will become intolerable. WBC can build house outside the restricted area. Garden grabbing has meant the demolition of many fine homes and few of the houses constructed have been in a price range attainable by those less fortunate. There is no legal requirement for an Avoidance Plan and no need for WBC to make profit making easier for developers. The Avoidance Plan should be abandoned.
102	15/07/2009	Sir Richard Barratt	

103	15/07/2009	Mrs PA Lydall	Strong objection to enormous number of houses WBC hopes to build in and around Farnham is contained as follows: the roads are congested and are crammed with traffic. There is no infrastructure to support another 1500-2000 people, school places are short, doctors are under stress and there are not enough dentists. Farnham covers only 10% of Waverley but has about 1/3 of the population. The houses should be built outside the restricted area as the SE Plan Policy NRM6 states. Do not urbanise the Park. Lovely houses have been destroyed to put up flats and garden grabbing is at its height.
104	15/07/2009	RH and MH Gooding	Objection. The population of Farnham has doubled in 50 years but the infrastructure has scarcely changed. Transport access and schools have not kept up with population growth and will not be able to cope with future growth. Reference to a letter in the Farnham Herald that the SPA offered a reprieve (from development) but this was taken away by mitigation. Desperately hope there is still time for sanity to prevail.
105	15/07/2009	Mike Cubitt	Objection. Document tries to circumvent the Directive. The attempted substitution of the Park for the heaths is totally misleading. The Park is not intended to be an alternative to heaths. Farnham already cursed with too much development. All the infrastructure facilities are overstretched: water supply and waste water, traffic and parking, schools. Development being permitted is alien to the needs of the population - buildings where developers can make most profit, destroying family homes and replacing them with flats. Farnham is full. Living accommodation must be spread further around and not continued in Farnham.
106	16/07/2009	Mrs E Finding	Objection. The houses planned for the Farnham area are too many and the area has had more than its fair share of houses over the last few years - the infrastructure cannot cope. The town is being overdeveloped. Future development should only progress once the impact assessments have been completed. Traffic, pollution and schooling issues are not being addressed
P46			Objection. Regard the Avoidance Strategy consultation as an unnecessary exercise. With reference to SE Plan NRM6, why is the Council not looking first at the possibilities of new housing development being delivered elsewhere in the Borough and not in the 5 km zone? For development in the 5km zone, the developer should provide the SANG. Why does the Council regard it as necessary to provide it? Waste of resources to carry out this work. Why is additional SANG needed for any development as there is already an over provision of 25% in the Park with the existing car parking? Is there a survey that shows the actual visitor numbers in existing SANG compared to the number it was designed for. Has there been an increase in visitor numbers resulting from the enhancements? Access to the Park from the north side will serve residents from Rushmoor, but the handover of the Park was for the use of Farnham residents. Why is the Council concerned with making this provision?
107	16/07/2009	Farnham Society	Mitigation is the responsibility of the developer. The consultation assumes public assent to the proposition that WBC should assist developers to build in the 5km zone. This public assent has never been established. Cites Regional Policy NRM6, Circular 6/2005, the SE Panel Report and the Examination in Public of the Core Strategy. Does not agree with either tariff. Consultation is premature and assumes WBC has decided
		(Continued)	Farnham should accommodate at least 540 houses before the SHLAA is complete and there has been any consultation. There is no schedule of specific deliverable sites to deliver housing (PPS3). Until there is conclusive proof that the housing allotted to WBC cannot be accommodated by small adjustment to urban boundaries that would not conflict with environment designation -prematurity
108	16/07/2009	JM Bray	Strong objection. The Park is not a new recreational area. It is the developers responsibility to provide mitigation. Why is WBC putting the developer first and the residents last? Has there been a survey to take stock of potential development outside the 5km zone? Does the Council have proof that the SPA is working? Dartford warblers are decreasing drastically. Has there been an ecological study in the Park? Wont rare species in the park be put at risk? An access is proposed adjacent to Poachers Barn - the Hotel was refused partly on the grounds that it would be reliant on travel by private cars. Farnham does not have the infrastructure to support more development - Farnham is full.

109	16/07/2009	Mr GC Gandy	<p>Objection. The Miniplan increased the population by 1300. There is not the infrastructure to cope. Schools are full and roads congested, pollution levels are high. There is no obligation by WBC to produce an Avoidance Strategy. Mitigation is supposed to introduce new recreational areas not increase access to existing ones. WBC should have the interest of the residents in mind not the developers. Farnham needs protection from developers and high priced flats replacing houses of character.</p> <p>Objection. Opposed to increase the SANG in the Park to facilitate more development within the 5km zone. The consultation is premature. First priority must be to build outside the 5km protected zone. The SE Plan did not expect targets to be met within the 5 km zone. The addition of 500 houses to the 567 already approved will put a considerable strain on the infrastructure. Issues: pollution, congestion, capacity of schools, doctors under pressure, water services. Where are dwellings to be built? No land availability assessment. Survey of alternative sites beyond the 5km zone? Since the 2007 Miniplan has there been monitoring of dog walkers or evidence that dog walkers have transferred from the SPA? WBC attitude appears to be supporting the developers which is not in their remit</p>
110	16/07/2009	D and K Griffiths	<p>Objection. The first priority must be to build outside the 5km zone. The SE Plan did not expect housing targets to be met within the 5km zone. No scientific evidence that the SANG attracts people away from the SPA. Until the LDF is published the Local Plan does not protect Farnham from overdevelopment. Development over the past two years has been high priced flats at the expense of houses of character. The Avoidance Strategy will generate more garden grabbing. The infrastructure cannot cope. Public transport is poor. The eastern access is unsuitable without a direct footpath. No proposal to protect the SPA. The 567 houses approved in 2 years is more than the target for the whole of Waverley. The Park is recognised by English Heritage and will become urbanised. Any alternative SANG will mean the same for Farnham. There should be no building in central Farnham. WBC is putting the interests of developers before residents.</p>
111	16/07/2009	D Simmons	<p>Objection. The elected members should wish to know that the electors don't want the Avoidance Strategy. WBC is jumping the gun and does not have public agreement with the proposal. The consultation is inappropriate and premature.</p>
112	16/07/2009	Mrs O Cotton	<p>Objection. Mitigation is the responsibility of the developer. WBC has no legal responsibility. The consultation assumes that public assent to development in the 5km zone has been given, which has not been established and that the distribution of the SE Plan allocation has already been determined. The consultation assumes that WBC has already decided that Farnham will accommodate at least 540 houses in the 5km zone, but the SHLAA has not been completed. WBC has not consulted the public on the specific deliverable sites to deliver housing. Until there is conclusive proof that the SE Plan housing allocation cannot be delivered by small adjustments to urban boundaries which would not conflict with environmental designations, the consultation is inappropriate and premature.</p>
113	16/07/2009	Patricia Gibson	<p>Support. Avoidance Strategy is a proactive way of facilitating development. Already been a significant investment in the Park. Capacity should be increased here in the first instance. Merit in having other sites in reserve for when the capacity of the Park is exhausted. Agreed the tariff for SANG but not the Natural England tariff for the SPA.</p>
114	16/07/2009	Taylor Wimpey UK	<p>Objection. The Avoidance Strategy is not the right approach. (See response for the Farnham Society 107)</p>
115	16/07/2009	Mrs DJ Georghiou	<p>Objection. Avoidance Strategy is a backhanded way of allowing more building in Farnham even though 567 houses have been permitted in 2 years which is 2 1/4 years of the target for the whole of Waverley. The strategy would lead to development within the Park (itself). Mitigation is the responsibility of the developer not WBC. The consultation assumes the public agrees with building in the 5km zone. Does not agree with further housing. The SE Plan Panel said the 5000 houses for Waverley could be provided outside the 5km zone. The SHLAA has not been completed or consulted on. The consultation is inappropriate and premature.</p>
116	16/07/2009	Helen Michel	<p>Objection. Cites the traffic congestion in Upper Hale, Six Bells Roundabout and the Shepherd and Flock. WBC putting the interests of the developer first before residents. Permission for 567 dwellings in just two years is more than the target for the whole of Waverley and all within the 5km zone. The SE Plan stated that it did not expect any of the targets to be met within the 5km zone. The first priority must be to build outside the 5km zone.</p>
117	16/07/09	Jan Blatchford	

118	16/07/2009	Moor Park Residents Assoc.	<p>Objection. Moor Park lies entirely within Zone B and is an integral part of Farnham. The consultation is not clear what effect the SANG or tariff would have on housing development in Farnham. No figures of new housing. In recent years development has been highly inappropriate - destruction of large properties, flats in subdivided gardens. Avoidance Strategy is wrong approach. The protection zones have been established to provide a buffer for the SPA. Additional housing should go outside the zone.</p> <p>Objection. WBC using an Avoidance Strategy to sidestep a 2005 EU Directive intended to preserve the heathland threatened by nearby urban development by prohibiting such development within 5km of the SPA boundary. WBC intends to allow further housing such as followed the Miniplan: 567 houses in 20 months twice the annual target for the whole of Waverley; most of the development is 2 bed flats when what is needed is family and affordable houses. Land for flats has led to garget grabbing. The infrastructure is already lacking - schools, doctors, dentists, roads policing, sewers. The plan would lead to 500-800 dwellings and 1800 people. Mitigation in the park is not valid it is a different habitat to the heath.</p>
119	16/07/2009	DJ Culshaw	<p>Objection. Extreme concern about the Park. Given to the people of Farnham and district by a covenant. Cites the importance of the deer park, its beauty and history and the business the visitors bring. Interference with the Park to enable further housing may change it for the worst. Suggests spreading the load and using one of the other options (alternative SANG sites). Would ease burden and the delicate balance of the flora and fauna.</p>
120	16/07/2009	Mrs CJ Rosenberg	<p>Objection. Avoidance Strategy ought to be called an enabling strategy for developers. The Park is in danger of losing its natural character. There is no scope for extension of SANG. The other sites are inaccessible unobtainable or trying to conserve their wildlife. The total housing quota for Waverley should be reduced. The whole strategy needs a complete and comprehensive rethink.</p>
121	16/07/2009	Mrs M King-Hele	<p>Objection. Avoidance Strategy is not the right approach. Mitigation is the responsibility of the developer not WBC. WBC is bound by Policy NRM6 "priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures". The SE Panel Report 2007 allocated 5000 on the assumption that they could all be located outside 5km zone. (Re options for SANG) Continued use of the Park is utterly unacceptable. No knowledge of Farnham Quarry, land to the east of Farnham Park or Blackwater Valley. Riverside is part of East Street and the south side is wet and noisy ;should ask the owner about the water meadows; Bourne Woods and Alice Holt - the Forestry Commission are against. No other ideas for SANG and against the whole idea so against the tariffs. Consultation is premature. Based on an assumption that the SE Plan apportionment has been determined when there is no SHLAA and no consultation on it. Opposes existence and detailed suggestions unreservedly. Farnham to be used as a dumping ground for development that should be shared among the towns and villages of the Borough in a fair and proportionate way.</p>
122	16/07/2009	David Wyde	<p>Objection. Totally opposed to using Farnham park for SANG. Has there been a survey of the Park? Has there been a survey of the birds and wildlife? Urbanisation would have a bad effect on the Park. Permissions have been for flats which haven't improved the south entrance of Farnham. No plans for more services such as the sewage works. Many councillors would be happy to see it go through outside their area. The plan should be for affordable housing across Waverley; protect the south entrance; complete surveys of the Park.</p>
123	17/07/2009	Gordon Williams	<p>Most strong objection. To the plan that would allow a further 500 dwellings. Farnham is the place it is because of the people who live here and their concerns should be listened to.</p>
124	17/07/2009	Helen Hellier	<p>Generally supports. Needs to make clear in the document the two pronged approach, ie the provision of SANG but also the provision of access management and monitoring measures - not clear in the document that this is an integral part of the package of avoidance measures : should be included in paragraph 1.3 and Section 7. Refer to Policy NRM6 in the introductory sections. References to 8ha per 1000 and the zones should be updated to reflect the fact that these are now included in the SE Plan. Section 14 should be clear that all new housing developments are expected to make a contribution to the access management measures. Paragraph 1.4 should reflect NRM6 that large housing developments are expected to provide mitigation that provides a combination of benefits. Correction : the guidance on SANG quality is a Natural England document. Policy NRM6 suggests developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land. Not necessary in Waverley but may allow for more flexibility in the longer term.</p>
125	17/07/2009	SE England Partnership Board	

126	17/07/2009	Stephen Cockrane Ian Crammond	Strong objection to using Farnham Park as mitigation for further overdevelopment of Farnham without the following: an impact assessment; a new Farnham Town Plan; infrastructure improvement of traffic, air quality, sewage, flood plain, water, parking, communications, green spaces and recreation, schools, doctors and dentists lists. Plan doesn't take into account NRM16; Circular 06/2005; The SE Plan; the EU Court of Justice ruling Waddensee C-127/02; PPS 3. WBC is acting irresponsibly. The Avoidance Strategy is fundamentally flawed and will have a detrimental effect of the conditions and community in Farnham.
127	17/07/2009	(Maj. Rtd)	Objection. Existing and proposed plans for expansion will destroy the town. The East Street development followed by others associated with the alterations to the Park are scandalous and unjustified. They will adversely affect every resident in the town.
128	17/07/2009	Roger Withington	Objection. (As for 111 above). Councillors to take full account of all the objections received and to act in accordance with the local residents whom they represent and to whom they are accountable by rejecting the proposal. Objection. Does not believe that increasing the allocated area of SANG within the confines of the Park is the best option. Further inappropriate development should not be encouraged without considering why Farnham is so appealing and lacking in blandness and without a considerable improvement in infrastructure and general amenity particularly with regard to all aspects of traffic. Development outside the 5km zone would be a more appropriate strategy, spreading development over all of the Borough, reducing the effects on Farnham, complying with the legislation and meeting Government targets. (Spreading development) would allow better opportunities for improvement of access and other critical infrastructure.
129	17/07/2009	Ian Burgess	Objection. Nothing to do with improving the Park and everything to do with building an excessive number of houses in and around East Street. Mitigation is the responsibility of the developer. WBC should be following the second part of the regional policy NRM6. Other SANG may be possible but WBC has failed to spell out the real purpose of the exercise and failed to be open and honest with the public.
130	17/07/2009	Dr R Thomas	Objection. The Avoidance Strategy is not the right approach. Mitigation is the responsibility of the developer and WBC has no legal responsibility. No public assent has been established for building within the 5km zone and cites the Regional Policy NRM6, Circular 06/2005 and The SE Panel Report 2007 and Inspector for Core Strategy. None of the potential sites for SANG are suitable. Doesn't agree with the tariffs as doesn't agree with SANG. Proposed Avoidance Strategy is invalid in that it proposes very significant development where mitigation is required and it is premature. It assumes that WBC has already decided that Farnham will be expected to accommodate at least 540 houses within 5km of the SPA, but the SHLAA has not been completed or published. No conclusive proof that the housing allocation cannot be accommodated in accordance with PPS3 - small adjustments to urban boundaries or Dunsfold. The enhancements haven't attracted people away from the SPA. Will not be attracted to an urbanised Park. Until there is proof the Avoidance Strategy can have no legitimacy.
P49			
131	17/07/2009	Michael Thurston	Objection. Does not agree that the Avoidance Strategy is right for Waverley and Farnham. Better to restrict development and then the need for a strategy would not arise. There are other parts of Waverley where development could take place without needing a strategy. Main reason for restricting development is that the infrastructure would struggle to cope - tackling the sewage problem is a priority.
132	17/07/2009	GJ Watson	Objection. The road transport network around Farnham will be significantly affected by the new Eco Town at Whitehill/Bordon which has been given the go ahead. It will also impact on the nearby SPAs (Wealden Heaths) which will need to be taken into account when considering development in the Farnham-Haslemere corridor. The Avoidance Strategy should not be put together in isolation because of the other factors that would be material and might outweigh the influence of the heaths. No consideration to cross border development, and how this should be accommodated.
133	17/07/2009	AG Goodall (2nd submission)	Objection. The Avoidance Strategy seems to have been designed solely to ensure that Farnham's housing grows. Provision of schools, social care, hospitals, police have not been expanded. Best approach would be to allow only one house for one house within the 5 km zone. The Avoidance Strategy avoids the spirit and intentions of the Directive and does nothing to protect wildlife. WBC is intentionally and knowingly attempting to violate the law. All the proposed SANG are unsuitable. Doesn't support the tariffs.
134	17/07/2009	Christi Daugherty	

135	17/07/2009	Mount Green Housing Assoc.	Support. A good thing to minimise the impact on the SPA but the Avoidance Strategy may over estimate the potential impact of the new homes on the 5km zone. Re the potential SANGs, continued use of the Park is probably easier to implement. A contribution from developers to the enhancement tariff is fair but not the full cost, WBC should contribute. Does not support the Natural England tariff. Moratorium affecting their housing association project which is having an impact on delivering much needed affordable housing - placed uncertainty on the timescales for implementation and reduces the possibility of securing HCA social housing grant. Tariff putting costs up and means additional social housing grant.
136	17/07/2009	Jennifer E Flack	Strong objection. 567 have already been built in Farnham which is now bursting at the seams. Not enough roads schools or water supply to cope and because of the density of traffic the air quality is below standard. WBC shouldn't assist developers. Cites Circular 06/2005. Why is WBC bending over backwards to allow overdevelopment when it is given clear advice that this is avoidable?
137	17/07/2009	John Ely	Objection. To the principle of WBC taking the initiative rather than developers to establishing SANG, and especially to the Park being used as SANG. By the covenants of 1930 it was given to Farnham UDC for local recreation and pleasure only - WBC is in breach of the covenant by inviting use to a wider audience.
138	17/07/2009	Christine Culham	Objection. Agrees with response No 99 (above). Much concerned about what will happen to the Park re signposts and pathways and car parking. No evidence that the Avoidance Strategy has done anything to protect the SPA. Look to the Councilors for protection
139	17/07/2009	Simon Bradbury	Objection. Cites Regional Policy NRM6, Circular 06/2005, South East Panel and Examination of the Core Strategy. WBC should not permit further development in Farnham until other options have been evaluated. No SHLAA has been published. Cites PPS3. Infrastructure of schools, doctors dentists, roads public transport is inadequate. What are the plans to upgrade the infrastructure? The effect of the Miniplan has not been evaluated, which is necessary before any decision can be made on any further Avoidance Strategy.
140	17/07/2009	Pamela Taylor	Objection. Has there been monitoring to find out whether any actions positively affect the birds that are under threat? If not all action will be invalid. The car park at Six Bells won't work. There are much more readily accessible places for dog walkers. Has anyone considered the history of the Park? There has been free and ready access for a long time. Farnham people feel the Park is being sacrificed so houses can be built in their overcrowded town. Against any action in the Park.
141	17/07/2009	Lancaster Ave. Residents Ass.	Objection. The infrastructure cannot cope. Road system hugely overloaded and poorly maintained; the schools cannot accommodate more pupils; the sewage system is at its limit and beyond. Many areas of the town have been blighted by recent overdevelopment and Farnham must now be protected to preserve its unique character for further generations.
142	17/07/2009	Mrs Jennifer Aird	Objection. Priority to build outside the 5km zone. SE Plan did not expect any of the targets to be met within the 5km zone. No scientific evidence that SANG attracts people away from the SPA. No impact assessments have been carried out. The Local Plan does not protect the unique character of Farnham. Development has been for high priced flats at the expense of houses of character in original plots. Infrastructure cannot cope. Public transport is poor. Eastern access unsuitable. No proposal to protect the SPA. Permission for 567 houses in 2 years more than the target for the whole of Waverley. The Park is recognised as a park of great natural beauty by English Heritage. any alternative site for a SANG would have the same effect there should be no building in central Farnham or its environs. WBC is putting the interests of developers before the residents.
143	17/07/2009	Christine J Silver	Objection in the strongest possible terms. The Avoidance Strategy is ill conceived, misleading and wholly inappropriate, disastrous for residents, business and visitors. WBC is imposing a disproportionate burden of housing on Farnham and the infrastructure cannot cope. Farnham is full. The Park should not be misused. Keep you hands off Farnham Park. There is no proof that SANG has any effect. Such plans benefit developers and not residents business or wildlife. The Miniplan resulted in vastly more housing than Farnham can cope with or needs. Housing must be at an equal rate across the Borough. The Avoidance Strategy is not necessary, contravenes the SE Plan and is not needed legally. It is based on a falsehood. WBC has no right to dictate to Farnham what they should do with the Park.
144	17/07/2009	Mike Silver	Objection in the strongest possible terms. Comments as for No 143
145	17/07/2009	SM Ward	Strong objection. There is no scientific evidence that by classifying the Park as SANG that it attracts people away from the SPA; the infrastructure cannot cope with more development; the Avoidance Strategy will generate more garden grabbing and further change the character of a cherished town.

146	17/07/2009	Mr and Mrs Sorgliti	<p>Strong objection to WBC seeking to increase SANG in the Park which will lead to a second phase of the Avoidance Strategy commenced in 2007. Would have a detrimental effect on a historic Park and destroy its informal layout. Further ignoring of the EU Directive will limit rejection rights of WBC in relation to planning applications and lead to overdevelopment.</p> <p>Objection. Not clear whether the Avoidance Strategy is to be a SPD or DPD. WBC is experiencing a level of conflict in discharging its roles as competent authority and local authority. The purpose of the Avoidance Strategy is to assist developers to build at least 540 new dwellings within the 5km zone. Cites Regional Policy NRM6 and Circular 06/2005, which WBC is ignoring and circumventing. There is no legal obligation on WBC to provide an Avoidance Strategy. Since there is no objective scientific evidence that the Park SANG will achieve the claimed level of avoidance which would eliminate the impact arising from the erection of dwellings within the 5km zone, the precautionary principle must be applied. Cites Circular 06/2005 re the Waddenzee judgement. Competent national authorities must be convinced that there will not be an adverse effect. Given the lack of certainty WBC has no alternative but to comply with the Circular and Regional Policy NRM6 and wherever possible site all new residential developments outside the 5km zone of influence.</p>
147		BG Davey	<p>The status of the Avoidance Strategy is unclear. The regional Policy NRM6 is relevant. WBC should be seeking development sites that do not require mitigation before starting a process that deliberately seeks to circumvent the priority action specified by the policy. The original Miniplan was based on an unverified opinion that only 50% of the potential capacity of the Park was being used by the public. Natural England proposed a survey method for obtaining reliable objective scientific evidence. The survey needs to be carried out in full detail. Cites a letter in 2006 from Natural England expressing concern about using the Six Bells car park. The proposal has not been subject to open debate by Councillors. Further considerations should the Avoidance Strategy be included in the Core Strategy: this consultation is premature and is based on an assumption that the housing allotted to WBC in the SE Plan has already been determined, and Farnham will be expected to accommodate at least 540 new houses in the 5km zone. WBC has yet to complete the SHLAA. PPS 3 requires that WBC should identify</p>
P51		(continued)	<p>deliverable sites in the first five years and WBC has not consulted the public or published a schedule. There is absolutely no legal requirement for WBC as competent authority to involve itself in the provision of SANG. WBC can discharge its obligations in respect of the Habitat Regulations without an Avoidance Strategy. Only a small area of SPA is in the Borough. Cites NRM6 and Circular 06/2005; WBC has not given any evidence that it has given priority to directing development to other areas of the Borough that do not need mitigation. SE Panel Report assumes that the 5000 houses allocation could be provided outside the 5km zone. Cites the Pre Examination meeting and criticism about lack of development options. WBC got it wrong the last time and is proposing to get it wrong again. WBC has pre-determined the outcome of the SHLAA and allocated at least 540 houses to the 5km zone. The Core Strategy will fail Test vii. Includes a diagram of the sequential step determination of housing location for the Core Strategy and apparent WBC approach.</p>
	17/07/2009	(Continued)	<p>Objection. Is there any absolute legal obligation on WBC to provide a Avoidance Strategy? In the light of Policy NRM6 should WBC be giving priority to directing development to those areas of the Borough where mitigation is not needed? Is the Avoidance Strategy based on a SHLAA and is it available to the public? Does the SHLAA demonstrate that it is not possible to accommodate the 5000 houses outside the 5km zone? Is the Avoidance Strategy based on a 5 years supply of deliverable housing sites in Waverley? Will WBC provide details of the 5 years sites which are planned in the 5km zone? Why is the Avoidance Strategy needed and what is its status? Will WBC assure the public that the Avoidance Strategy will be robust and not fail Test vii?</p>
148	17/07/2009	Abigail McKern	<p>Objection: Farnham is already overloaded - road services, parking and congestion. Public transport does not keep pace. WBC should resist developers attempts to building in the 5km zone and their attempts to profit at the town's expense. The Park and the area of the old Park should be sacrosanct. East Hants has already overdeveloped north of WBC boundary.</p>
149	17/07/2009	(Signature not identifiable)	

150	17/07/2009	J Parker	Objection. Astonished that as a consequence of the Miniplan, permission has been granted for over 500 houses in less than 2 years. No public argued requirement nor a public assessment of the impact on Farnham as a whole. Has grave misgivings about doubling the number of units and would like to see if there is a compelling case for having them in the 5km zone. If there is a case, would like to be assured that the infrastructure can stand this very sizeable development because it will impose intolerable strains on services already under severe pressure. WBC should carry out assessments of the impact and if the results are unfavourable then the infrastructure should be improved before proceeding.
151	17/07/2009	Rose Marie Knowles	Objection. It is the town, its history and people, human beings that need protection. Overdevelopment has led to traffic gridlock, poor air quality and a mindless destruction of the quality of life. Farnham is full. The Bordon Eco town will lead to a vast conurbation that will swallow up completely what is the distinctive attraction of Farnham. The centre is quite small, the roads are narrow and surrounding space needs to be preserved and protected.
152	18/07/2009	Dr and Mrs Dumoulin	Objection. Farnham is full, the infrastructure is creaking and the congestion has to be seen to be believed.
153	18/07/2009	Alicia Buckle.	Objection. No analysis that demonstrates that the Miniplan was effective. WBC should undertake a study to confirm the effectiveness of the previous plan. Does not believe there is further scope for development in Farnham. There has been overdevelopment in the form of unwanted flats and these have had a major impact on infrastructure: congested roads, schools oversubscribed, increasing pressure on dental medical and hospital services and on parking.
154	18/07/2009	Sharon Buckle	Objection. (As for No 153)
155	18/07/2009	AE Arathoon	Objection. Avoidance Strategy is not the right approach, it is the responsibility of the developers. As a resident of south Farnham, deplores the effort to destroy the environment. The roads and infrastructure in the area cannot support a larger population.
156	18/07/2009	KB Parfitt	Objection. With planning permission having been given for 567 dwellings in the Miniplan, astonished that WBC is even planning further developments. Infrastructure already unable to cope. The expansion in local schools and the hospice has created an intolerable situation on local roads. Gives rise to safety considerations and a considerable increase in air pollution. Further development must take place outside the 5km zone, to avoid further overcrowding. No further expansion of South Farnham schools or hospice without due consideration of development outside 5km zone. Long term planning is essential.
157	18/07/2009	Penelope Simmonds	Objection. Farnham is a historic town with a unique character. Attractions of the town are an asset to the SE. The proposed plan is not supportable by the current infrastructure: services, transport and facilities. Not commenting on the policy to increase housing in the SE, but unreasonable to expect Farnham to absorb the extra loading on behalf of the greater part of Waverley and the existing population to accept this burden.
158	18/07/2009	Christopher Bryan	Objection. Opposed to the further enhancement of any existing SANG and to any new SANG. Increasing the area of SANG implies an increase in development within the 5km zone. Not convinced there is a need for mitigation and that all other options for development outside the 5km zone have been scrutinised.
159	18/07/2009	Alicia Hellier	Objection to the Avoidance Strategy.
160	19/07/2009	RG Hutton	Objection, to more SPA to be established in the Farnham area, (may mean SANG). Allocation of additional parts of the Park does not enhance wildlife but serves to enable further housing development. More than enough new housing for the limited infrastructure, traffic is excessive air quality poor and services are stretched.
161	19/07/2009	Rosemary Thomas(Friends of Farnham Park Committee)	Strong objection. Consultation is dishonest because it doesn't explain what the strategy is, does not indicate that avoiding overuse of the SPA could be achieved by other means such as limiting the number of houses within the 5km zone. An unnecessary exercise. The Park has already been improved by the allocation of money from the first SANG, further work is not required. The proposals for the Park will alter its character which WBC should be protecting.

162	19/07/2009	VC and RE Green	<p>Objection. Does not agree with the Avoidance Strategy approach. Why is WBC doing something that developers should be doing? Owns part of the water meadows. Contains a myriad of flora and fauna that would be adversely affected by an additional influx of animals and humans. Already have dog faeces, out of control dogs, horses chased - more dogs we do not need. Identifying other SANG is the developers' responsibility. Agrees with both tariffs. Giving advice to developers is a responsibility that the Council must accept. Preparing a means whereby they can get round the provision of the SPA is not the Council's responsibility.</p> <p>Objection. To the imminently threatened excessive increase in house building in Farnham, proposed under the guise of a Draft Avoidance Strategy. Town already has problems of traffic congestion and air pollution. How can it support an ever increasing population without damaging its character.</p>
163	19/07/2009	John and Mary Watkins	<p>Objection. In 1930 the Park became the property of the people of Farnham to be preserved for the inhabitants of the town and district. Its uses was restricted to pleasure or recreation ground purposes only. The use of the Park (as SANG) contravenes the 1930 conveyance. The Park does not belong to WBC (in fact it does). People of Farnham don't think it is fair that WBC appear intent on building up its quota of new dwellings in gridlocked, polluted and full up town.</p> <p>Objection. Avoidance Strategy not the right approach. Mitigation is not the responsibility of WBC, but that of the developer. Shouldn't be aiming to assist developers to build within the 5km zone. Cites the Regional Policy NRM6. Inconceivable that all areas in the rest of Waverley are less suitable for development. Cites Circular 06/2005. WBC hasn't completed or consulted on a SHLAA. Re other potential SANG, the question is premature and Avoidance Strategy states reasons why most of sites are unsuitable. Does not agree with tariffs. WBC feigning concern about rare birds but has a firm intention to allow development in an inappropriate area. The consultation paper assumes that WBC has already decided Farnham should accommodate 540 new houses in the 5km zone. This is contrary to Government policy. Cites the SE Panel. The consultation is premature and a gross misuse of council tax payers money</p>
165	19/07/2009	Mike Bryan	<p>Objection. Opposed to the second phase of the Avoidance Strategy increasing the amount of SANG in the Park and permitting the granting of further development permissions. Farnham does not need any further dwellings and is not able to provide their logistic support. The Park should be allowed to retain its natural character and original purpose when presented to the people of Farnham in 1930.</p>
166	19/07/2009	Michael Stacey	<p>Objection. Is there a legal obligation on WBC to produce an Avoidance Strategy? Cites Policy NRM6. Is there a SHLAA and is it available to the public? Does the SHLAA demonstrate that it is not possible to accommodate the 5000 allocated house in Waverley outside the 5km zone? Is the Avoidance Strategy based on an identified five years supply of deliverable housing sites in Waverley? Will WBC provide the public with details of all the 5 year deliverable housing sites in the 5km zone? Why does the community need an Avoidance Strategy and what is its status? Will the Avoidance Strategy be robust and not found to be unsound against Test vii? Objects strongly to 567 dwellings being given permission in just two years, more than the target for the whole of Waverley and all within the 5km zone. Development has been high priced flats at the expense of houses of character in original plots. The Avoidance Strategy will generate more garden grabbing. Farnham infrastructure cannot cope. First priority must be to build outside the 5km zone.</p>
167	19/07/2009	Mary Parker	
168	19/07/2009	Lesley Parker	
169	19/07/2009	AS Murdoch	<p>Objection (See No 167)</p> <p>Objection. Does not agree that the Avoidance Strategy is the right approach to avoiding adverse impact on the SPA.</p> <p>Objection. Avoidance is the responsibility of developers. WBC has no legal responsibility. The paper assumes public assent to WBC assisting developers to build in the 5km zone - this has never been established. Cites Policy NRM6, Circular 06/2005, the SE Panel and the pre Examination meeting. Does not agree with the tariff. Consultation is premature. Assumes housing allotted to Waverley has already been determined and Farnham will be expected to accommodate at least 540 houses in the 5km zone, but Waverley has yet to complete or consult the public on a SHLAA. Cites PPS3. WBC has not consulted the public on or produced a schedule of 5 years specific deliverable sites to deliver housing. Until there is conclusive proof that the housing allocation allotted to WBC by the SE Plan cannot be accommodated by small adjustments to urban boundaries that would not conflict with environmental designations the consultation is inappropriate and premature.</p>
170	19/07/2009	David Georghiou	

171	Mrs Marion Smith		<p>Objection. Cites Policy NRM6. Strategy does not give evidence as to whether it is necessary to consider development in the 5km zone. Therefore it is premature. And WBC should set compliance with Policy NRM6 as a priority over the strategy. The surveys were carried out in the summer so WBC should not extrapolate from this to the winter situation when the Park is unattractive for recreation. Supports the recommendation of Natural England that a precautionary approach be adopted. WBC should see if there is increased use of the heaths in winter when the Park is less attractive. Dartford warbler and woodlark over-winter, so not satisfied that the Avoidance Strategy affords sufficient protection for them. Fails to cover Wealden Heath 1 and 2. Therefore the Avoidance Strategy is not the right approach. Development in the 5km zone should not be considered until sites not requiring a strategy have been identified. The Bordon Eco town has not been taken into account. Re the potential SANG sites, part of Farnham Quarry is an SNCI. The case for the Park as a SANG is not made because of its reduced winter carrying capacity. Funding works and monitoring should not be at any cost to the council tax payer.</p>
172	KRA Denne	19/07/2009	<p>Objection. Does not agree with use of the Park as a SANG or with the extension. No evidence that there is tangible benefit from the Miniplan. What evidence is there that more people use the Park than did prior to the Miniplan and has there been a check to see if people using the Park would have gone to the SPA instead? The proposed parking near St John's Church is totally unsatisfactory. The Park was not given in 1930 to the people of Farnham for use as a SANG to justify more development. Already more than enough development in the Park. Cites Policy NRM6 - housing should be directed outside the restricted area (5km zone). Housing already permitted will soon have an impact on the infrastructure. Future permissions likely to be for expensive flats. Farnham is reaching saturation point re building and infrastructure.</p>
173	David Howell	19/07/2009	<p>Objection. Understands that no Avoidance Strategy is required to be introduced by WBC. Developers should propose their own strategy. WBC should not dictate housing policy unreasonably to Farnham. Developers should pay both tariffs except for social housing when an appropriate payment should be made. WBC should have challenged the SE Plan but did not. Now attempting to burden Farnham with additional housing, leaving other areas less affected.</p>
174	JAM Cockburn		<p>Objection. Concerns that the Avoidance Strategy may draw conclusions before the Core Strategy is complete. Had responsibility for the North Wealden SPA. Concerns: timing- to come to a conclusion on the Avoidance Strategy before the Core Strategy is inappropriate because there is a risk of inconsistency; a decision being made for convenience; assumptions on behavioural change of people and traffic that is speculative, incomplete and out of date. Environment: in the Core Strategy WBC should consider all the Conservation Areas (for wildlife?) and develop a coherent strategy. The Avoidance Strategy seems to ignore the possibility of a more radical solution. More research is needed. May be able to justify more housing but may prove impossible to justify infrastructure necessary to support development. Necessary to look at areas more than 5km from the SPA. A full risk assessment should be carried out on the Park. Concerned about deer and dogs. People behaviour: no data to show that any increase of use in the Park has been matched by a decrease in people visiting the SPA. Evidence needed of a fall in the use of the SPA at a level which justifies the initial SANG and the extension. No targets and to what extent they are being met. Conclusion: consultation does not present an adequate case to justify the extension of SANG and does not explain the original assumptions. The argument of the extension is based on poor, incomplete and not wholly relevant data. More work is needed. Responsible approach would be to take measurable steps to reduce use of the SPA and when the evidence is available determine to what extent to extend the SANG</p>
175	Mary Hunt	19/07/2009	<p>Objection. Opposed to the first SANG. The Park was given to the people of Farnham and not for the economic gain of developers who should provide mitigation and not look to WBC. Garden grabbing ignores the fact that many beautiful houses have been lost in south Farnham. Any violations of the EU law will be dealt with in the European Court of Justice. Cites the zones. Has WBC taken details of the number of people who have visited the existing SANG? Does not agree with developer's tariff. An extension to the SANG would mean urbanisation of the Park. Infrastructure should be explored and supplied before any speculative development should take place. Traffic is quite untenable in Farnham and the east access point would mean more traffic on the A325.</p>

176	19/07/2009	David Lambert	<p>Objection. Applications are likely to be for south Farnham which is already a magnet for developers. South Farnham already suffers from major traffic holdups. The schools in south Farnham are already full. Have not seen the full effect of 567 permissions already granted. If the Strategy is accepted it could mean an increase of 500-800 houses which would further stretch the town's education health, roads and parking infrastructure. The Strategy would spoil the nature of the Park. Fanciful to think that additional residents will take walks in the Park, rather than trample on the SPA and disturb the birds.</p> <p>Objection. Does not think the Avoidance Strategy is the right approach. Does not agree with the potential SANG sites and does not agree with the tariffs. Strategy contradicts EU, Government and SE (Plan) directives relating to SPAs. Mitigation cannot be an excuse to allow residential planning when areas that would not be adversely affected have not yet been considered. Why has WBC not produced a Planning Assessment? (SHLAA?) Developers are responsible for applications with due regard to the SPA. WBC should be defending the residents needs before the developers.</p>
177	20/07/2009	Wrecclesham Village Society	<p>Strong objection to building of 500 additional houses in Farnham. The resources, schools etc are not available. WBC should publish the number of houses required in Godalming, Haslemere and Cranleigh and indicate why Farnham bears the brunt of the total requirement. The Bordon Eco Town requires access and it will be via Farnham and Wrecclesham. Any sign of a bypass 30 years late?</p> <p>Strong Objection. Opposed to the Avoidance Strategy which will result in 500-800 new dwellings in Farnham which is grossly overpopulated. Explains location of the town. Overpopulation can be seen in the use of the roads to the south and the dangerous all day free parking. SCC does nothing about it. Cites traffic problems in the town. All the indoor spaces are overcrowded. No attention is given to the capacity of the schools or the sewerage treatment plant. Developers add to the congestion and leave the town less workable and the residents bitterly discontented.</p>
179	20/07/2009	Mr and Mrs RJ Francis	Objection. (As for No 170)
180	20/07/2009	Roger Hull	Objection. (As for No 170)
181	20/07/2009	Krish Kakkur	Objection. Does not believe the Strategy is viable or in line with the needs of the area
182	20/07/2009	Dee Lecoq	Objection. Does not agree that the Avoidance Strategy is the right approach. Building should not take place in the 5km zone, that is the only way to protect endangered species. No proof that identifying a nearby area and promoting it will persuade people to go there rather than the SPA. Until there is proof that the Miniplan has provided protection the Avoidance Strategy is premature. The mediaeval deer park should not be urbanised. It is a very different habitat to the SPA. The other potential sites have been discounted in the text. Does not agree with SANGS therefore does not agree with either tariff. Cites Policy NRM6. WBC has not done a SHLAA which is essential before the Avoidance Strategy is considered.
183	20/07/2009	Ann Thurston	Objection. Cites the history of the Miniplan and the current position re SANG. Has WBC looked at the possibility of looking for development elsewhere in the Borough? Should have done a SHLAA. Did the Miniplan work? Has WBC checked how many people used the Park in the first place so they would know that more go there now since the Miniplan? Would extra visitors have otherwise gone to the SPA? Has the bird population been checked? Is the eastern access near the church at Heath End acceptable for people with dogs and children? The Park was given for the enjoyment of the people of Farnham in 1930s. Is it to be hijacked and urbanised by the addition of special pathways, signage and organised car parks? Farnham will soon feel the impact of the permissions given over the past few years, which will be great enough without adding an extra burden of housing to the services. Many of the permissions have been for flats which are not required but what developers want to build. Increasing the SANG could mean 500-800 new dwellings. Cites the Regional Policy NRM6. No reason for WBC to create an Avoidance Strategy at all. Told to build outside the restricted area.
184	20/07/2009	Tim Clay	Objection. On the grounds that it will not fulfil an advantageous outcome for the residents of Farnham, dog walkers and ground nesting birds alike. Further consultation is required.
185	20/07/2009	SE Green	Objection. Does not agree that the Avoidance Strategy is the right approach. Does not think any of the potential sites would be suitable. A site in Hampshire would be a good idea. Does not agree with either tariff. Why is WBC helping out Rushmoor? Can prove that the tariffs have been ring fenced. Say no to the EU telling England what to do, its just a waste of time effort and energy. Lives in south Farnham and would not walk the dog in the SPA or the Park.
186	20/07/2009	Nick Green	

187	20/07/2009	Joe Michel	<p>Objection. Disagrees vehemently with the Avoidance Strategy which would lead to overcrowded development because the first priority must be for developers to build outside the 5km protected zone which would affect their business. Mitigation is the responsibility of the developer not WBC. The consultation assumes the public agrees with WBC assisting developers to build in the 5km zone. Does not agree with the despoilation of the park or any other area of Farnham by further housing. The infrastructure cannot cope. Cites the SE Panel Report. The alternative open spaces have already been considered unsuitable in the document. There is not Strategic Farnham Development Plan. The consultation is premature and based on an assumption that the housing requirement in the SE Plan has been determined and Farnham will be expected to accommodate 540 houses even though there is no SHLAA.</p> <p>Objection. Does not agree that the Avoidance Strategy is the right approach. The SANG at the Park should not be increased until WBC's Local Development Framework (LDF) is in place to protect Farnham. This would allow time for Natural England to carry out tests to prove, as required by the EU, that SANG work. The SANG at the Park should not be increased as it is a park graded of natural beauty and historic significance. Re alternative sites, these should be investigated, but scientific evidence is needed to ensure that SANG work to protect the SPA. Re other potential SANG, smaller sites should be considered for SANG away from the centre of town that people do not have to drive to. These would attract people more than one large area. Agree with both the tariffs. The Town Council does not wish to see the SANG extended in the Park because it would conflict with the Waverley Borough Local Plan (2002). It should be left as a natural Park without improvements. What work has WBC done to look for alternative sites for development rather than building in the 5km zone, and what has it done to scientifically</p>
188		Farnham Town Council	<p>prove whether SANG protects the SPA? The validity of the questionnaire is questioned and whether people had enough information. Have developers been asked whether they would provide their own SANG? What is the position on the Six Bells car park and how much pressure is on WBC to agree to the development of the Hotel to get access to the Park. Increasing the SANG at the Park would have such a dynamic effect on the town that the Town Council needs to be confident that SANG works. Development growth, traffic, schools and transport infrastructure would only be taken into account once the LDF is in place. Any development that was allowed now would not take these issues into account. This would put Farnham at risk of losing its character and individuality.</p>
189	20/07/2009	(Continued)	<p>Objection. To WBC's proposal to designate the Park as SANG in order to allow inappropriate development in the town centre. WBC has no right to make this designation as the park belongs to the people of Farnham (in fact it is owned by WBC). Developers must provide SANG themselves. The proposal goes against the spirit and the letter of EU legislation and should be dropped.</p>
190	20/07/2009	Andrew Jones	<p>Objection. To the use of the park as part of the Avoidance Strategy for the building of even more houses in an already congested town. The infrastructure of Farnham cannot support any further development.</p>
191	20/07/2009	Juliet Evans	<p>Support. Agrees the Avoidance Strategy is the right approach as an interim measure in advance of the adoption of the Joint Delivery Plan. All the potential SANG are suitable. Have not identified any other sites. A flat rate tariff for SANG is not reasonable. Affordable housing with an associated legal agreement should be excluded from the tariff. Does not agree with the Natural England tariff as they should work to their own budgetary constraints. Welcomes the effort WBC is making to try and resolve the issue, and urges that the every effort is made to reach a final solution.</p>
192	20/07/2009	John Price	<p>Objection. The Avoidance Strategy is not the right approach at the present time. Further use of the Park as SANG or land to the east is not suitable. Farnham Quarry, the water meadows and the Blackwater/Valley could be considered. Other SANG could be the Wrecclesham sand pit and land near the Rural Life Centre. Population living east (south?) of the bypass should be discouraged from travelling to the Park. Agrees with both tariffs. Scheme is premature and should be considered when the development plans for Farnham are available for consultation. All other areas of Waverley should be examined first. Infrastructure is overstretched. Could SANG be discontinued leaving residual problems? Do developers have to purchase land or lease it? What legal agreements will there be for SANG permanent future? Urbanisation of the Park must be discouraged. Is there liaison with adjoining LAs? More roads in Farnham should be conservation areas. WBC wilfully ignoring Government, the SE Plan and Planning Inspectors.</p>

193	20/07/2009	Brian Martin	<p>Objection-Avoidance Strategy not the right approach. Damage already done by allowing the Sandy Hill Estate. Idea of SANG ill considered. Plenty of green spaces around Farnham. Premature of Waverley Borough Council to take money from developers for works in the Park. Doesnt agree with the two tariffs. Questions the results of the 2007 surveys. Takes issue with assertion that WBC owns the Park. Does not believe it was the EU legislation that identified ground nesting birds in the SPA.</p> <p>Objection. Does not agree with the draft Strategy which is imprecise and obtuse in contrast to the Guildford Strategy. The measures outlined are the responsibility of the developer. The role of the competent authority is to check that applications are legally compliant, including compliant with the Directive. Absence of evidence that mitigation will be effective. Nowhere is there a clear unequivocal statement that WBC considers that the Strategy will ensure that a residential development will have no likely significant effects on a protected site. According to the Delivery Framework, SPD/DPD need an appropriate assessment. Cites Bracknell Forest BC. Empirical evidence on the effectiveness of SANG remains absent. Should draw up the Strategy on SMART principles. Document lacking any detailed analysis or evidence which would permit decision makers to judge the effectiveness of the Strategy. Specific comments: the April 2007 version of the Miniplan not formally approved. Detailed editing points on paragraph 9.1. Para 9.5 Results of visitor survey should be included in the document. No case of</p>
194		Marin Clegg	<p>abandoning the precautionary approach recommended by Natural England of assuming a 75% user capacity. Para 11.2 should be rewritten - needs a table. The available SANG only used up if it includes allocations to developments that have not yet been decided.- If they are excluded around 5ha would remain and several years in the future other SANG may be available. A further allocation in the Park only represents an option if it can be objectively justified. SANG in the Park may not be exclusive to Farnham. The SE Plan and the Delivery Framework give cross border priority. The 5 km zone covers a substantial part of Rushmoor and Hart and Guildford. The location of the Six Bells roundabout car park will reinforce allocation of the Park as SANG for the Aldershot Urban Extension and other developments falling in the 5km zone.</p>
P 57		(continued)	<p>Para 11.5 Editing. Para 11.6 Without the direct link to the Park the Six Bells car park will be unconnected, cites access problems. Users of the car park would be from other LAs which would lead to greater pressure but would not decrease the risks to the SPA. Paras 12.7 Supports the use of Farnham Quarry and the watermeadows as SANG. Para 12.8 Guildford takes a more positive attitude towards the use of the Blackwater Valley as SANG. Redraft para 12.9. Para 13.1 Costs in Appendix 3 and 4 should be updated. Why WBC has no 35% endowment should be explained. Tariffs are lower than Guildford. Para 13.2. Calculation of the tariff based on a 21.25 capacity only appeared in the April 2007 document, not the February 2007 version. Para 14.3 The access management and monitoring tariff will fail disproportionately on smaller affordable dwellings. Para 16.2. Visitors survey a poor baseline for measuring changes in visitor use over time. Detailed assessment of the survey. Para 17.4 Case law has established that the Habitat Regulations are applicable at each stage of the planning process.</p>
195	20/07/2009	Clive Kiley	<p>Objection. Does not agree that the Avoidance Strategy is the right approach. All development in the SPA should stop. WBC should eradicate all feral cats and stray dogs in the SPA area and the Borough. WBC should develop a programme for residents to - lease and muzzle all dogs in the SPA at all times; cat should be fitted with a device to alert birds and WBC should campaign for this; ban all walkers and dogs on the SPA during the breeding season; encourage cat owners to have bird feeders which has been proven to reduce the number of birds killed.</p>
196	20/07/2009	Kathy Smyth	<p>Objection. It is illogical to consult on more SANGS for Farnham in advance of any subregional consideration of the need for SANG and prior to publication of a SHLAA.</p>
197	20/07/2009	Sue Hull	<p>Objection. (As for No 170)</p>

198	Friends of Farnham Park		<p>Objection. Poses 6 questions: 1. Can WBC assure us that the Bishop's 1930 Terms of conveyance to Farnham precluded the use of the Park as commercial mitigation for development in Rushmoor and many thousands of diverted non-scooping SPA users, that being an unavoidable risk of the creation of a new eastern access to the Park? 2. How can a compensatory strategy that at best only aims to mitigate parts of the major risks be considered to constitute full avoidance? 3. Can WBC provide a reliable Legal Opinion stating that the Interim Avoidance Strategy and Delivery Framework can be used to grant lawful consents to non-imperative reasons of over riding public interest (IROPI) 4. Is there any evidence that the advertising of existing facilities as SANG will not encourage dog ownership and so have the opposite effect of that intended? 5. Is there any evidence that the proposed SPA access restrictions will not be counter productive by causing harmful displacement to other areas of the SPA.</p>
	(Continued)	20.07.09	<p>6. What enhancements have attracted how many people away from the SPA and at what cost? What restrictions to access to the park have been removed? (A further entry is made into this schedule under Mr. J Hyman's submission at No 217)</p> <p>Support. Welcomes proactive approach and prompt revision of Miniplan. Suggests should make clear that under Policy NRM6 larger developments may be expected to provide bespoke mitigation including SANG, biodiversity enhancement, green infrastructure and potentially new recreational facilities. Large schemes must be assessed on a case by case basis. and may require an appropriate assessment. The approach should be clearly set out. Not clear that the developers who provide their own SANG will also have to pay the strategic access management and monitoring tariff. The mitigation tariff is based on a bedroom calculation, but most other LAs use the average occupancy rate. Should be considered further. Suggests remove the text of the Delivery Strategy from the document. On the proposed SANG: the Park -supports precautionary approach, robust visitor monitoring important.</p>
199	RSPB		<p>Supports efforts to secure other SANG and agrees with assessment. Farnham Quarry: concerned that the restoration to wetland is to be a smaller area. Does not want SANG to compromise the viability of the wetland. Bourne Woods and Alice Holt - supports Forestry Commission concerns about the impact on heath land birds. Questions WBC ability to satisfy the Habitat Regulations without an appropriate assessment. Text needed to explain the relationship with the LDF. New housing will affect the Wealden Heaths too should seek Natural England's advice and work with East Hampshire and Chichester to adopt a joined up approach.</p>
200	20/07/2009 (continued)	20/07/2009	<p>Objection. Does not agree with the proposals or the sites suggested, in particular the Park.</p> <p>Objection. Does not agree that the Avoidance Strategy is the right approach. WBC focusing on mitigation which is not its responsibility but that of the developer. WBC should identify those areas most suitable for housing outside the 5km zone surrounding any SPA in the Borough. It can't be hard to find pockets of suitable infill in the wider region of Waverley that will spread the load and ease congestion of all services. re the potential sites - it would be a travesty to impinge further on the Park. Leave the other areas understated. WBC needs to explore the big picture first. Re the SANG tariff, has overtones of blood money. Developers should respect a no area bigger than the 5km. Does not support the Natural England tariff. A rushed Strategy. No new housing should go anywhere near a SPA nor should it burden a community with overcrowding.</p>
201	Helen Robinson	20/07/2009	<p>Strong objection. Initiative has little to do with protection of birds and everything to do with unwelcome development. Has written to object to many apartment developments. The Avoidance Strategy will open the floodgates to more development in an area already suffering in terms of its infrastructure. Treasures the Park and to see it used as a way of justifying more dwellings is appalling. What is needed is a north-south bypass. WBC should look elsewhere for ways of supporting the SE Plan, such as Dunsfold.</p>
202	JL Pye	20/07/2009	

203	20/07/2009	Andy Macleod	<p>Objection. No evidence that the approach works to protect ground nesting birds. Does not use the Park to walk his dog. Have there been any surveys of dog walkers? No information about the relative scale of the problem caused by cats or dogs. Facilitating development will increase the cat population. Why asking about other SANG when the document gives good reasons why they are unsuitable except the Park. If a SANG proves necessary then agrees with both tariffs. Agrees with Derrick Price (See No 63).</p> <p>Objection. The Avoidance Strategy is about residential building development in the 5km zone and is only considering one element of the overall problem of reconciling housing development with the need to protect wildlife. Premature because no consideration of the Wealden Heath or the impact of future regulations on it. No idea of how much housing and where. This should be determined by the SHLAA, so Strategy is premature. Related factors Bordon Eco Town and Dunsfold. Re the other potential SANG sites, do not substantially disagree. Concerned about the management of Bourne Woods and sites in the River Wey valley. Do not know of any other sites. Agrees with both tariffs. Opening up to more development will be to the detriment of existing local wildlife, the Group's main concern.</p>
204	20/07/2009	Bourne Conservation Group.	
205		Penny Macleod	Objection. (See No 203)
	21/07/2009	REPLIES ARRIVED LATE	
206		Bob Milton	<p>Objection. Avoidance Strategy does not meet the Wadenzee certainty test that there is any evidence that it works. Plan relies on the use of an existing area of public open space and the unproven theory of discounted capacity put forward by Natural England and there is no evidence to support this approach - it was invented to circumvent and illegally avoid the duties set out in the Habitat Directive. Theory of access management fails as it relies on the introduction of primary legislation to restrict public access rights. Removes the legal basis of the Strategy and Delivery Framework. The Park was acquired and covenanted to the people of Farnham and the powers of WBC under the 1990 Local Government Act do not negate the legal duties in place at that time. Cross border mitigation or avoidance would be unlawful. The eastern access car park would be used by Rushmoor residents. The Park bylaws say dogs must be on leads in the presence of stock but the Natural England criteria state that dogs must run free. The Delivery Framework will increase the awareness of the SPA so increasing the use from Rushmoor. The incorporation of the Habitats Directive into CROW 2000 is not enforceable against existing public rights of access, so basis of the plan in access management is false. The park and over 80% of the SPA is public access. Considered by many to extract the developers' levy is fraud. Negligent not to have an appropriate assessment. Adds support to the Friends of Farnham Park.</p>
	12/07/2009	(continued)	

207	David Wyld (second submission, received late)	21/07/2009	<p>Objection. No legal obligation on WBC to produce a strategy or SANG. The three options open to developers implicitly concedes that mitigation rests with the developer. WBC could refuse to permit any residential building within the 5km zone unless it complies with the Directive. WBC has not undertaken a SHLAA. Cites PPS3. WBC has assumed the outcome will show that it has no alternative but to build in Farnham. The need for an avoidance strategy has been predetermined and its implementation is premature. Annex 1 on the SE Plan Policy NRM6 not included in the document. Cites the Policy, Circular 6/2005 and the SE Panel - the Strategy is in conflict and ignores. Questions : is there a legal obligation on WBC to produce an Avoidance Strategy to implement the Habitat Regs? Is WBC directing development to areas where potential adverse effects can be avoided without the need for mitigation? where is the SHLAA? Does it show it is impossible to accommodate the 5000 outside the 5km zone?</p> <p>Where is the 5 year supply of deliverable housing sites and where are they in the 5km zone? If there are none why do we need an Avoidance Strategy? Dartford warblers are in decline. Should not be a developer's charter for Farnham. Makes a case that the villages in Waverley would benefit from development as they are dwindling away. The Avoidance Strategy has three examples of questionable and incomplete process : no legal requirement, the NRM⁶ and no SHLAA, incomplete information: social housing and the bird population and Annexe 1 missing could the consultation be run again so there could be a serious debate.</p> <p>Objection. Proposal is impossible to sustain within the present infrastructure and within 2 years. Farnham needs a better proportion of family houses and those affordable for first time buyers. Is the SHLAA available for the public? Is the Avoidance Strategy based on it? Hopes that WBC will consider concerns before developers.</p> <p>Support for finding a solution that allows development to take place but strong concerns about the further designation of the Park. Does not meet the Natural England standards; land already open to the public so SANG unlikely to result in additional visitors and there will be conflict with existing users. The following standards are not met by the Park SANG: adequate car parking; accessible car parks; appropriate access points; paths easy to use; interpretation panels at access points; access largely unrestricted with space for dogs to exercise freely. The Park as SANG will not either be in the spirit of the law or meet the statutory requirements. Land to the east of the park will. 10 ha available as SANG and site will comply with Natural England standards as follows: 32 new car parking spaces; circularat 2.3km path; car park will be a new facility; circular route will start and end at the car park; no steep gradients so suitable for wheelchairs; site open so perceived as safe; meadow with tree planting semi natural in character; plenty of space for dogs to run free; no unpleasant intrusions; will be clearly signposted and</p>
208	Maureen Briggs	17/07/2009	<p>advertised; benches will be provided. Will meet all the SANG requirements and will give enhanced facilities to the Church and landscaping through new planting. Asks that the land be considered as SANG.</p> <p>Objection. Appalled by the plan for the Park to enable an increase in housing. Increasing its usage will make it an urban commercial Park. Why destroy gardens and knock down a house and build several smaller ones? The increased population will exacerbate the local facilities such as the schools. Farnham is full and now an Eco Town on the doorstep.</p> <p>Strong objection. Avoidance Strategy abrogates management decisions to Natural England. Areas under their influence include the huge Defence Area, and their demands should be a warning against acceding to their wishes. Dartford warblers only recently spread up to the area, but have been set back by cold weather. Dogs disturb them and woodlarks and nightjars but there are worse predators : foxes and badgers, crows and grey squirrels. Natural England should be challenged.</p> <p>Objection. Does not agree with more houses in Farnham. Have too much traffic; air pollution; water pressure problems and the sewerage system cant cope; there is a shortage of school places doctors and dentists. The Park should be left as it is.</p>
P60			
209	D and M Partnership		
	(continued)		
210	J Crammond	18/07/2009	
211	DF Fourt	18/07/2009	
212	Mrs Primrose Carter	24/07/2009	

213	05/08/2009	CPRE	<p>Objection. Avoidance Strategy fails to distinguish between avoidance of harm and mitigation of harm. How will WBC avoid harm which will depend on the policies for the allocation of 5000 homes required by the SE Plan. Premature to consider further SANG until distribution of housing known. Premature to consider further SANG in the Park, which is for the benefit of the people of Farnham. Should not take into account Government targets. Sceptical about the efficacy of the Six Bells roundabout and the measures taken in the Park for which there is no evidence base that it has drawn people away from the SPA. Uncertainty about how the potential sites would mitigate harm to the SPA. Bourne Woods and Alice Holt Forest should not be SANG, both at full capacity. The Strategic Gap could be SANG. Do not underestimate the private sector to come up with sites. Agrees with the tariffs. More monitoring needed and evidence base. Residents of south Farnham have other areas to go to and no evidence base for the use by them of the SPA. Access to the SPA is poor.</p>
214		Surrey Rural Housing Group	<p>Objection. Affordable housing will not be exempt from the developer's tariff and there will be additional cost on the viability of the schemes. Needs an approach that takes into account the specific circumstances in rural areas and measures to ensure the tariffs do not have an adverse impact on the provision of affordable housing.</p>
	30/06/2009	LOCAL AUTHORITIES	
215	16/07/2009	Guildford (Officer comments)	<p>Support. Agrees the Avoidance Strategy is the right approach. Suggests annual surveys. Supports the Quarry as SANG and the Blackwater Valley and suggests cross border working. Agrees with both tariffs. Guildford tariff has risen considerably.</p>
216		WBC Housing Officer	<p>Explains the housing situation in Farnham: the need is higher than WBC is able to meet, so new affordable houses are needed. The current freeze on planning applications is preventing WBC from enabling new affordable houses and is an issue that should be resolved as soon as possible</p>
217	20/07/2009	SEPARATE RESPONSE	<p>Objection. Summary of Questions to be asked. 1) Can Waverley Borough Council assure us that the Bishop's 1930 Terms of conveyance to Farnham preclude the use of the Park as commercial mitigation for development in Rushmoor and many thousands of diverted non-scooping SPA users (that being an unavoidable risk of the creation of a new eastern access to the park)? 2) How can a compensatory strategy that at best only aims to mitigate parts of the major risks be considered to constitute full avoidance? 3) Can WBC provide a reliable Legal Opinion stating that the Interim Avoidance Strategy and Delivery Framework can be used to grant lawful consents to non-IROPI applications? 4) Is there any evidence that the advertising of existing facilities as SANGs will not encourage dog ownership, and so have the opposite effect to that intended? 5) Is there any evidence that the proposed SPA access restrictions will not be counter-productive by causing harmful displacement to other areas of the SPA? 6) Which enhancements have attracted how many people away from the SPA and at what cost?</p>
	20/07/2009	Mr J Hyman	<p>7) What restrictions to access to the Park have been removed?</p>
	20/07/2009	(continued)	<p>Comments: Natural England confirms that, providing enhancement and monitoring measures are in place, the capacity of the Park can increase from 10.9ha to 21.25ha. Natural England accepts that the area adjacent to Six Bells Roundabout with the estimated capacity of 25 cars with the footpath link has the potential to attract extra visitors. However, the area must be clearly signposted. There should be monitoring of the Park as SANG from the main access routes to demonstrate an increase in use, as well as surveys to identify that visitors are using the Park instead of the SPA, from this access point created from the Six Bells area. The document could be shortened using web site references. Re alternative sites- the Quarry and Tongham Pools together provide an excellent opportunity for cross boundary working and strongly encourage Rushmoor Guildford and Waverley to negotiate. Supports use of the east side of the Park as a SANG. 7.4ha is on the small side but with its strategic position providing a 2.4km walk should be possible. If the whole of the site cannot be secured then a direct footpath should be secured. The current route from the eastern car park is not ideal. No knowledge of the Riverside and the south side of the Bypass, the water meadows or Bourne Woods. Latter might</p>
218		Natural England	

219	12/08/2009	GOSE (continued)	<p>Riverside site and the south side of the bypass, the watermeadows or Bourne Woods. Latter might be a useful benchmark for further investigations into visitor capacity issues. Pleased to see the in-perpetuity calculations being included in the tariff for the Park SANG. Supports the inclusion of the access management and monitoring tariff. Supports the monitoring of visitors to establish trends of use. Vital that the approach to visitor management assessment should be comparable to other areas. Has advised other LAs that an AA will be taken for the Core Strategy. Reference to the AA for the SE Plan and the Policy NRM6 would also be included within the Waverley assessment. If WBC accepts the view that avoidance strategies are measures designed to eliminate significant effects from housing development on the SPA then stating it within the document would help to meet the commitment as competent authority under the Habitat Regulations.</p>
No comments			