

Respondent		Summary of Response	Officer comments
01	Farnham resident	<p>1. Little evidence that the strategy is working. More protection to the SPA is required. Increase exclusion zone in to 800 metres. Fewer new houses should be allowed within the 5 km buffer zone. SANG area should not be increased.</p> <p>2. Occupancy rate should be reviewed quarterly.</p> <p>3. Developers should be required to source their own SANGS.</p> <p>4. Planning applications for replacement houses and additional space, bedrooms, etc should be taken into account in both allocation and tariff.</p> <p>5. Contributions for the upkeep of the SANGS should be based on more than 80 years as indicated in the document.</p> <p>6. The Park must not be allowed to become a dog walking space to the exclusion of Farnham residents.</p>	<p>1. The review was concerned only with the council's implementation of the Avoidance Strategy. Its fundamental principles were not proposed to be changed. The effectiveness of the strategy is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.</p> <p>2. The rate is reported to each meeting of the Western Planning Committee.</p> <p>3. The strategy allows developers the option of providing their own 'bespoke' SANG.</p> <p>4. The strategy applies only to net increases in dwelling numbers.</p> <p>5. Reference to 'in perpetuity' maintenance costs will be clarified.</p> <p>6. Issues of management of Farnham Park are noted and will be brought to the attention of the council's Parks & Countryside Team.</p>
02	Farnham resident	<p>1. The review is not a full assessment of whether the Avoidance Strategy actually works. At best, it is a very partial exercise. Evidence suggests that Farnham Park is not an effective alternative to visiting the SPA.</p> <p>2. The recalculation of the average occupancy rate is not unreasonable and the commitment to review it regularly is appropriate. However, the methodology understates the likely increased occupancy and resulting pressure on Farnham Park arising from new permissions to date and in the future.</p>	<p>1. The review was concerned only with the council's implementation of the Avoidance Strategy. Its fundamental principles were not proposed to be changed. The effectiveness of the strategy is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.</p> <p>2. The occupancy rate and resultant SANG capacity are regularly monitored.</p>
03	Farnham resident	<p>The Avoidance Strategy is not fit-for-purpose and does not satisfy the law that requires "convincing" evidence that the mitigation is effective.</p>	<p>The effectiveness of the strategy, including the SAMM project, is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.</p>

04	Farnham resident	The effectiveness of Farnham Park as SANG in dettracting visitors from the SPA has not been tested. Lower than expected Park visitor numbers suggest that more people are using the SPA instead. The 400m to 5 km zone is too arbitrary.	The visitor survey of Farnham Park confirms that the previously assumed (precautionary) capacity, as advised by Natural England (NE), was too low. The survey's findings, along with the resulting enhanced SANG capacity, have been endorsed by NE.
05	The Farnham Society	<ol style="list-style-type: none"> 1. Farnham Park is becoming an overworked asset. Alterations within the Park should be enhancing not diminishing. 2. SANGS allocation should prioritise brownfield sites over greenfield sites. 3. Enhanced SANG area should be the maximum to encourage developers to provide their own SANGS. 4. Appendix 2 (Quality Criteria) omits the qualifying text included in the 2013 updated version of the Strategy. 5. Questions the effectiveness of the Strategy in deterring people away from the SPA. The exclusion zone should be increased to at least 600 metres. Housing sites over 5 km should be developed in preference to those within the zone. Could the SANG provision be increased to 10 hectares per 1,000 population? 6. Numerous questions and observations about the basis and operation of the tariff and the ongoing maintenance costs. 7. Numerous observations about dogs in Farnham Park. 8. The restored sand pits at Runfold are the best and possibly only real option for new SANG. Farnham Quarry and Tongham Pools have limitations. 	<ol style="list-style-type: none"> 1. Issues of management of Farnham Park are noted and will be brought to the attention of the council's Parks & Countryside Team. 2. The strategy requires that allocations are made on a 'first come, first served' basis. 3. Developers always have the option to provide their own 'bespoke' SANG. 4. Omitted text in Appendix 2 will be reinstated. 5. The review was concerned only with the council's implementation of the Avoidance Strategy. Its fundamental principles were not proposed to be changed. The effectiveness of the strategy is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England. 6. Any further changes to the tariff would necessitate a comprehensive re-evaluation that is beyond the scope of the current review. 7. Dogs are a management issue for the park and not relevant to this review. 8. Comments on new SANG are noted.
06	Farnham resident	Strategy must be kept in place. Farnham cannot cope with increased house building. Traffic and parking is horrendous.	Noted.

07	Farnham resident	<p>1. Essential that the average occupancy rate is reviewed on a regular basis.</p> <p>2. The owners of Bishop's Meadow should provide the necessary investment to be designated as a SANG.</p> <p>3. WBC should object to any further relaxation of the conditions attached to the planning application already approved for Alton Road Sandpit if it is to be considered as a SANG.</p>	<p>1. Monitoring systems are already in place.</p> <p>2. Noted.</p> <p>3. Noted.</p>
08	Natural England	<p>1. The Avoidance Strategy is generally appropriate, but some details need clarification.</p> <p>2. Para 2.6 should refer specifically to the 5-7km zone. The SPA Delivery Framework states that developments of over 50 dwellings within this zone may have an impact on the SPA, and may therefore be required to provide mitigation would be advantageous for clarity. Residential development in this zone may also require an Appropriate Assessment.</p> <p>3. All avoidance and mitigation proposed, in the form of SANG and SAMM, should be in consultation and agreement with NE.</p> <p>4. The three-pronged approach (para 5.1) should be expressly outlined to make it clear that both SAMM and SANG are required per residential development in order to satisfy the Habitats Regulations.</p> <p>5. (para 5.4) NE acts to host the SAMM project, but Hampshire County Council manage the collected funds.</p> <p>6. No objection to the proposed alterations in the current SANG capacity at Farnham Park, based on the capacity calculations and changes to occupancy rates. The council should include a provision for regular monitoring of occupancy rates.</p> <p>7. Paragraph 7.3 should explain more clearly that the proposed SANG avoidance will be assessed on a case by case basis. Appropriate mitigation will always be in the form of SANG avoidance and SAMM mitigation.</p>	<p>1. Noted.</p> <p>2. Noted. Reference to the 5 - 7 km zone will be included in the final document.</p> <p>3. Noted. Reference will be added.</p> <p>4. Noted. Reference will be added.</p> <p>5. Noted. Reference will be added.</p> <p>6. Endorsement of the enhanced capacity is noted. Occupancy rates already regularly monitored.</p> <p>7. Noted. Reference will be added.</p>

09	Gladman Developments Ltd.	<p>1. For proposals within the 400m zone, the Council should consider their merits on a case by case basis in consultation with Natural England.</p> <p>2. A more flexible approach to SANG contributions should be undertaken. The Council should consider approaches that have been successfully implemented by different local planning authorities.</p> <p>3. The requirement that other rooms in new dwellings shown as a study, nursery, bonus room or other name, but which could effectively be considered as a bedroom creates an unnecessary financial contribution.</p> <p>4. Support the intention to review the SANG/SAMM tariff, but suggest that a fixed timeline should be established (i.e. on an annual basis) to ensure that these figures are kept up-to-date.</p>	<p>1. The operation of the 400m 'exclusion zone' is a fundamental part of the Strategy that was not proposed to be changed.</p> <p>2. All authorities affected by the TBH SPA have Strategies and contribution tariffs that are appropriate to their areas. The Council is satisfied that its Strategy (as reviewed) is fit for purpose.</p> <p>3. Noted, but this matter was not explicitly part of the review. Such issues are more appropriately addressed when applying for planning permission.</p> <p>4. Noted.</p>
10	Bracknell Forest Council	<p>1. There should be a reference to the 5 km – 7 km SPA buffer zone as referred to in the Delivery Framework.</p> <p>2. Plan 1 needs to be clearer and add the 5 km – 7 km zone.</p> <p>3. The monitoring of the SANG capacity of Farnham Park according to the evolving average occupancy rate seems to be a valid approach.</p>	<p>1. Noted. Reference to the 5 - 7 km zone will be included in the final document.</p> <p>2. Agreed.</p> <p>3. Noted.</p>
11	Farnham residents (duplicate submissions)	<p>1. Evidence is not provided to justify the selection of 400 metres as the distance from the SPA at which its 'Zone of Influence' commences.</p> <p>2. Since the 2014 Survey reportedly changes WBC's strategic view of the SANG capacity of Farnham Park, WBC must provide full explanatory details of the 2014 Visitor Survey within or referenced in the Avoidance Strategy document.</p> <p>3. Notwithstanding unused SANG capacity, it would be unreasonable to authorise any further development in Farnham without considering the impacts on road traffic.</p>	<p>1. The operation of the 400m 'exclusion zone' is a fundamental part of the Strategy that was not proposed to be changed.</p> <p>2. The methodology and findings of the consultants' survey are set out fully in the report and have been endorsed by Natural England.</p> <p>3. The impact on traffic is a matter for consideration at the planning application stage.</p>

12	Friends of Farnham Park	<p>1. Review neglects the Park's multi-functional role. It also does not recognize knock-on effects of additional visitors and it does not consider increases in other users of the Park. Do not believe that the current strategy provides a realistic basis for implementation.</p> <p>2. Numerous observations about the use and management of the park including the capacity of the current main car park, access paths, visitor numbers and the possibility of 'Parkruns'. No account appears to have been taken of the effect of the SAMM project in diverting people and dogs from the SPA. Serious consideration given to providing an assistant ranger or a dedicated dog warden.</p> <p>3. General comments/observations on the impact on the Park of proposed developments at Hale Road and west of Folly Hill.</p> <p>4. No consideration has been given to any impact that additional SANG usage may have on Farnham Park as a Site of Nature Conservation Importance (SNCI), an area of Historic Landscape Value (AHLV) a Grade 2 listed Historic Park and Garden (English Heritage designation), a Local Nature Reserve (LNR).</p>	<p>1. The review was concerned only with the council's implementation of the Avoidance Strategy. Its fundamental principles were not proposed to be changed. The effectiveness of the strategy, including the SAMM project, is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.</p> <p>2. Issues of management of Farnham Park are noted and will be brought to the attention of the council's Parks & Countryside Team.</p> <p>3. Not relevant to the review.</p> <p>4. Review is not concerned with 'usage' of the SANG, rather its capacity as mitigation.</p>
13	Farnham resident	<p>Objects to the Avoidance Strategy. It has very little to do with protecting wildlife habitats but has a lot to do with building the most houses possible around Farnham. If Waverley is serious about protecting wildlife habitats, it makes no sense to increase housing within 2.4kms of the SPA.</p>	<p>The review was concerned only with the council's implementation of the Avoidance Strategy. Its fundamental principles were not proposed to be changed. The effectiveness of the strategy, including the SAMM project, is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.</p>
14	RSPB	<p>Not clear whether how many of 1,057 dwellings permitted between 2007 and 2016 have been built and occupied. Concerned that the 2014 baseline visitor survey is justifying more housing allocation to the same SANG, rather than addressing the reasons why there has not been an increase in visitor numbers to the SANG.</p>	<p>The issue of using the new base date and the calculation of the unallocated capacity is not as clear as it needs to be. Further explanation will be provided.</p>

15	South Farnham Residents' Association	<p>1. The visitor numbers and the resulting capacity figure have been understated as a basis upon which to recommend changes.</p> <p>2. Before more development is allowed in Farnham, there should be evidence that the SANG is working as intended. A more cautious approach to the release of more SANG capacity should be adopted.</p> <p>3. The phrase "in perpetuity" means just that and does not mean for the expected lifetime of the development.</p> <p>4. At least a proportion of the SANG should be reserved for brownfield sites.</p> <p>5. It should be stated in the text how often the occupancy rate will be reviewed.</p> <p>6. Have any other boroughs changed the occupancy rate which the Delivery Framework recommends as part of its "consistency" approach?</p> <p>7. Fail to understand the relevance of the "base date of June 2014" for estimating SANG capacity. Query the calculation of the unallocated SANG capacity of 1462 dwellings.</p> <p>8. More prominence should be given to the wording of NRM6 as far as the priorities required by this policy are concerned.</p> <p>9. The original wording of the 'Quality Criteria' (Appendix 2) should be reinstated.</p>	<p>1. The calculations of the revised SANG capacity (including the methodology) have been endorsed by Natural England.</p> <p>2. The effectiveness of the strategy, including the SAMM project, is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.</p> <p>3. Reference to 'in perpetuity' maintenance costs will be clarified.</p> <p>4. Allocations are made on a 'first come, first served' basis.</p> <p>5. Occupancy rates are currently monitored for each meeting of the Western Planning Committee, but could change in the future.</p> <p>6. The council is not aware of other authorities using a different occupancy rate. Natural England is satisfied that the council's approach is consistent with the Delivery Framework.</p> <p>7. The issue of using the new base date and the calculation of the unallocated capacity is not as clear as it needs to be. Further explanation will be provided.</p> <p>8. Policy NRM6 is reproduced in full (Appendix 1).</p> <p>9. The original wording will be reinstated.</p>
16	Farnham resident	Farnham Park is crowded with dog walkers at all times of the day. No more dogs please!	Not relevant to the review.
17	Park View Residents' Association	The proposed planning application for the development of 110 houses on Folly Hill would breach the Guidelines for the Quality of SANGs.	Not relevant to the review.

18	Farnham resident	The Avoidance Strategy has little to do with birds, but more to do with increasing housing around and SPA. No evidence has been produced that SANGS actually protect birds.	The effectiveness of the strategy, including the SAMM project, is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England.
19	CgMS Ltd	<p>1. We act on behalf of PLOT (Farnham) LLP who own the land identified within the draft strategy as one of the sites that the Councils consultants identified for potential SANG ("Farnham Park Extension/Land off Hale Road) .</p> <p>2. Using the lower household occupation levels from the recent work the capacity at the site over and above that needed to support the development will be in excess of 300 units.</p> <p>3. Pleased that the Council recognise that there is still the need to set aside other adjoining land to meet current and future housing needs.</p>	All comments noted.
20	Neame Sutton Ltd on behalf of Bewley Homes plc	<p>1. Generally supportive of the approach in terms of increasing the capacity of the Farnham Park SANG.</p> <p>2. The increased capacity should be made available to all residential development proposals that come forward within the catchment area whether on previously-developed sites or on peripheral greenfield locations.</p> <p>3. Essential that the Council continues to pursue other opportunities to create new SANGs in the Farnham area to ensure that the objectively assessed housing need over the plan period can be accommodated.</p> <p>4. The Farnham Neighbourhood Plan should not progress to the next stage until further progress has been made with the identification and delivery of additional SANGs.</p>	<p>1. Support noted.</p> <p>2. This is the current strategy.</p> <p>3. Noted.</p> <p>4. Noted, but not relevant to the review.</p>
21	Rowledge Residents' Association	The methodology in the review seems reasonable, but increased numbers of visitors (and vehicles) using Farnham Park will themselves have an impact on the SPA. Shouldn't SANG preferably be located outside the buffer zone?	The Avoidance Strategy states that SANG should be provided within the 5km zone.

22	Farnham resident	<ol style="list-style-type: none"> 1. The SANG is not working, in that the numbers of nesting birds is now at a dangerously low level. 2. The exclusion zone should be increased so fewer houses can be built within the 5 kilometre zone. 3. Developers should source all their own SANGs to meet all criteria in full, transferring ownership to Waverley with sufficient funds to maintain space in perpetuity. 4. Wriggling to cut perpetuity down to 80 years should be banned. 	<ol style="list-style-type: none"> 1. The effectiveness of the strategy, including the SAMM project, is a matter for the TBH Joint Strategic Partnership Board, as advised by Natural England. 2. The operation of the exclusion zone is a fundamental part of the Strategy that was not proposed to be changed. 3. A basic tenet of the strategy is to give developers the option of providing SANG themselves or making financial contributions. 4. Reference to 'in perpetuity' maintenance costs will be clarified.
23	EPR Ltd on behalf of Wates Developments	<ol style="list-style-type: none"> 1. Wates Developments has land interests at Waverley Lane, Farnham, which are currently the subject of three planning applications for residential due to be heard at Appeal in June. 2. TBH Delivery Framework states that larger developments (up to 7km) could require impact avoidance measures. 3. Strategy should make it clear that the presumption against development within the 400m exclusion zone is against residential development, and more specifically in relation to Use Class C3. 4. Strategy should make it clear that it is necessary for SANG (including Farnham Park) to continue to be able to attract visitors who might otherwise visit the SPA throughout the year, not just during the bird nesting season. 5. Household occupancy rates should continue to be monitored. 6. Strategy seems to overlook the potential for a Section 106 agreement, signed at the Outline stage, to agree the framework for payments that will be made at this later date. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. Reference to the 5 - 7 km zone will be included in the final document. 3. Reference to Class C3 uses is made in para 1.4. 4. Public accessibility (at all times) is a basic requirement of all SANGs. 5. Occupancy rates are currently monitored for each meeting of the Western Planning Committee. 6. Payments agreed at outline stage can be amended later (reserved matters). 7. Noted, but not relevant to this review.

		<p>7. The site within Wates' control at Waverley Lane (Compton Fields) would meet all 14 of the SANG quality 'must/should have' criteria, as well as all 5 desirable criteria. This means that the site has been under-estimated in terms of its potential to come forward and provide effective strategic SANG. Natural England have confirmed that the proposed SANG design at this location is suitable and satisfactory.</p>	
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