

OBJECTIONS - 20th NOVEMBER 2014

The first list consists of typical reasons - further down you will find new 'technical objections'.

Further Suggested Grounds for Objections to 35 Frensham Vale will be added to this list regularly - please email Frensham Vale Action Group if you have other objections to this Planning Application so we can share them with the wider community

frenshamvale@gmail.com.

You must submit your objections ahead of the deadline of 22nd December 2014 you can do this either online OR in writing see samples and guidance at the end of this document.

IMPORTANT NOTE: The objections below are not listed using any specific criteria - please feel free to select any combination in any order and as many objections that are important to you personally and please try to use your own voice/words. If objections are identical, they do not have the same impact as individually phrased objections because it may appear as if people do not care as much. Technically, objection and the issues in it are addressed in the decision making process. However, Waverley Planning is interested in how much concern there is in the local area, so our advice is to give your objections your own emphasis and express any concerns you may have. Also, if you have been online you may have noticed a couple of objections 'for' this application from outside of the local area - these seem to be associated with the developer or the owner(s) of 35 and 37 Frensham Vale, so taking their lead - after registering your own objections why not notify your friends and family even if they live outside of the local area.

Planning Application WA/2014/1890 for the erection of up to forty six (46) dwellings with vehicular access, car parking and landscaping by Bargate Homes Limited at 35 Frensham Vale Farnham

Neighbours directly affected in the immediate vicinity of the intended build have come together to seek professional advice on how to fight the application and a hired expert will be presenting arguments against the development to the case offer in due course. If you would like to know more about this and are able to help support the cause at a more tangible level please feel free to contact us by email at frenshamvale@gmail.com or telephone 0844 412 5772 (local rates - you can leave a message and your phone number for a call back). However, weight of opinion is paramount within which every objection counts (please note every individual has the right to register their opinion - it is not limited to a household). In this regard, please consider and feel free to draw from the list below, therein the key arguments, when submitting an objection:

- A. The timing of this application can be deemed entirely inappropriate in that it was submitted during the consultation period for Waverley's New Local Plan. Clearly this consultation must be allowed to run its full course to guard against the wrong development in the wrong places taking place at this time - especially when, as in this case, development is on a large scale such that it stands to count for 10% of Waverley's annual development quota.
- B. Frensham Vale is a high-risk flood area (Flood Zone 3) within which the natural soak provided for by the trees is critical to managing an already delicate situation. The felling of trees in the area in anticipation of development is already entirely unacceptable and the wider felling planned, the reducing grassland and adding additional hard surfaces to an area which floods can only exacerbate the problem for existing home owners and road users in Frensham Vale.
- C. If we are to see genuinely 'sustainable development' in Waverley, the surrounding infrastructure must first be significantly advanced BEFORE builds of this size can be put into the area.
 - o Traffic is already a problem on the Vale during the school run and during periods of adverse weather and flooding when the dangers of falling into the ditch are very real (as a large coach and a Dust Cart can recently testify). At 4m in width at its widest Frensham Vale cannot accommodate 92 (or more) extra cars that the new development has allocated parking space. The increased danger to cyclists, and particularly to children walking to school/the bus stop at the end of the Vale, will be such that residents will all have to take to cars themselves, when currently they may walk or cycle, further exacerbating the traffic issue.
 - o The pressure on schools in the area is well documented and of huge concern - the catchment area for South Farnham Infants is today at less than 300m already ruling all of Frensham Vale out of the catchment (and leaving one family on the Vale travelling to Puttenham on a daily basis - this the nearest good state school with a place in recent years). We are categorically

told there is no space to build new classes at Farnham's current primary schools so where will the young children of these families go to school? The pressure will continue to increase on Weydon secondary school, a school that is already oversubscribed. All of these new builds are within the Weydon catchment and will serve to reduce the catchment net across the Bourne.

More typical Reasons to object:

1. The proposed site - 35 Frensham Vales is located within the Wealdon Heath Buffer Zone. This is an area where there are ground nesting birds e.g. the Dartford Warbler.
2. Impact on wildlife - birds, bats, badgers, slow worms, toads, deer, butterflies, moths and many other species of insect inhabit and forage for food on this woodland site. Particular attention should be made to protected species. This woodland environment is rural and provides a *wildlife corridor*.
3. The proposed site - 35 Frensham Vale is located in 'Countryside beyond Greenbelt.' This means that although it is not greenbelt, 'Countryside beyond Greenbelt' is a policy to help protect the rural environment.
4. The site is adjacent to protected 'Ancient Woodland'.
5. The proposed site at 35 Frensham Vale is not located within a 'Settlement Boundary' or near one. This boundary is a requirement for town planners when considering granting planning.
6. 35 Frensham Vale has TPOs on some of the trees.
7. Destruction of woodland. Attempted breach of the Forestry Commission's Felling Licence. 'Thinning' was halted to prevent clear felling. The Forestry Commission have been unclear about the replanting requirement.
8. Farnham already exceeds EU Environmental levels. More houses and more cars will exacerbate this already significant challenge to reduce carbon emissions causing known problems to our health and longevity.
9. Impact on the character of the area from semi-rural to urban.
10. Traffic impact - condition of access onto Frensham Vale (opposite designated river/stream). Level of traffic dangerously high and car speed often recklessly high. Road safety at junction of access road onto Frensham Vale.
11. Access from Frensham Vale to the proposed site is not adequate for emergency vehicles. Flooding would exacerbate Emergency Vehicle Access.
12. Drainage impact - fewer trees = more concreate. Significant reduction to 'Functional Flood Plain'.
13. Flooding impact. Frensham Vale is located in Flood Risk Zones 2 & 3. The land at the end of the drive at number 35 adjoining Frensham Vale is a 'Functional Flood Plain'. During heavy rainfall, the Frensham Vale river/stream floods and becomes invisible to road users.
14. Education, insufficient schools to provide education to existing population and there is no plan to expand this essential provision. Families hoping to enrol their children into South Farnham School will discover that they are not in the school's catchment area.
15. Health, Social Services - Hospitals/doctors/dentists. Not enough doctor surgeries in the area for the existing local population. Local hospitals are under pressure to deliver the

expected level of NH Service (there is a recent threat of Farnham Hospital closure). All healthcare provision, pregnant mothers, mid-wives, new born right through to care for the elderly is operating at or beyond capacity.

16. Sewage. The system which runs from Gardeners Hill to Frensham Vale functions on overcapacity. There have been several incidents of sewage spills with and without flooding as a cause.
17. Significant disruption during building time to pedestrians, cyclists, horse riders and all vehicular traffic.
18. Inappropriate, out of scale size of development for the site area.
19. Proposal to build mainly 'luxury' homes cannot be 'affordable' to first time buyers or the 'average family'.
20. According to WBC's report 'Tour of Potential Greenfield Housing Sites' 29 April 2014, the proposed site (35 Frensham Vale) is located on contaminated land which is not brownfield.
21. BATS - A bat survey carried out on the development site and reported in the Ecological Appraisal found four species of bat foraging (common and soprano pipistrelle, brown long-eared and serotine). Bats were also seen emerging from the house which is proposed to be demolished to facilitate the development. The vague and unspecific mitigation steps which are proposed in the Ecological Appraisal cannot adequately mitigate or compensate for the negative impact on bats of the large-scale tree felling, reduction in foraging area, demolition of existing house roost, and major increase in artificial light which this proposal entails.

The vague and unspecific mitigation steps which are proposed in the Ecological Appraisal cannot adequately mitigate or compensate for the negative impact on bats of the large-scale tree felling, reduction in foraging area, demolition of existing house roost, and major increase in artificial light which this proposal entails. Brown long-eared bat roost of county importance and so we would be concerned that the loss of a significant number of trees in the area would have a negative impact on this important colony. Brown long-eared bats are woodland feeders and are particularly averse to light and so a development of this nature would certainly be harmful to the conservation status of this species, which is included in the UK biodiversity action plan.

The presence of both crevice-dwelling and roof-void dwelling bats, as recorded in the report, has been confirmed by numerous sightings (and hearings) over the years.

22. The Developer's **Biodiversity** report states there are no Water courses (rivers or streams) within 50m of the site - this is incorrect (Frensham Vale stream is about 5m from the site).
23. The Developer's **Biodiversity** report states no heathland is within 50m of the site - this is incorrect, it is bordered by heath to the West.
24. The Developer's **Biodiversity** report states there are no ponds within 200m with a surface area greater than 225 sq metres. This is incorrect, there is one that straddles the land of 44/46 Frensham Vale which is larger and closer than 200m and is **clearly marked on the OS map**.
25. The Developer's **Ecological** report states the OS map shows no ponds within 250m - again this is incorrect.
26. The Developer's **Flood Risk Report** claims the site is in flood zone 1 and has a < 0.1% of flooding per year. This is incorrect. The environment agency flood maps quite clearly

show the northern part of the site to be flood zone 3 (the highest possible) and in the last 2.5yrs has flooded on numerous occasions. The true risk of flooding each year is probably > 90%.

27. The Developer's **Flood Risk Report** states several times the site has low natural run-off rates and high infiltration capacity of the soils. So concreting over the site will greatly increase run-off rates and exacerbate the already severe flooding problems that occur in Frensham Vale every year and downstream in Latchwood Lane. It will also slightly increase flood risk on the River Wey (which the stream flows into near Waverley Abbey) at Tilford, Elstead, Eashing, Guildford etc. When the road is flooded the river course is hidden, human life is endangered.
28. The Developer's **Traffic survey** - The survey by amazing coincidence coincided with half-term. These traffic figures should be totally disregarded since a large portion of the traffic in Frensham Vale is school traffic.
29. The Developer is suggesting some sort of cycle lane. This suggestion increases the risk of fatal accidents as the road is already far too narrow and the cycle lane is not continuous on the A287 or Gardeners Hill Road.
30. The Developer's **Accident Data** fails to mention the coach that fell into the stream last winter 2013/14. The road was closed for several hours while a heavy-duty crane was drafted in to lift it out. The reason for the accident was the road is too narrow for the current traffic levels - This happened about 100m from 35 Frensham Vale. A Waverley Borough Council commissioned refuse lorry suffered the same fate in recent years. The accident does not mention the data held by Surrey Highways which includes a fatal accident.

Technical Planning Objections.

1. Summary

- 1.1. The location of this site and the harms that the proposed development would cause mean that this proposal is not sustainable development in terms of the National Planning Policy Framework (NPPF) policies. Therefore there is no presumption that planning permission should be granted.
- 1.2. The harms that would be caused would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. Therefore, planning permission should be refused.
- 1.3. There is a potential reason for refusal in terms of flood risk. It has not been satisfactorily demonstrated that there would be safe access and egress from the site in the event of flooding. There is potential that a sequential test and exception test would need to be passed before planning permission could be granted.
- 1.4. The new Waverley Local Plan is being prepared quickly and is expected to be adopted in less than 18 months. Therefore, there is a reason for refusal in terms that the outcome of the local plan should be awaited before granting planning permission in the face of national and local policies that would otherwise require refusal.

1.5. Main issues

- 1.6. The main issues in this application are:
Adverse impacts would arise if planning permission were to be granted which significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole

- 1.7. The presumption contained in the NPPF is in favour of **sustainable development**. The NPPF describes this as a golden thread running through decision taking. It follows therefore that for this planning application to be acceptable the proposed development would have to be sustainable. The NPPF definition of sustainable development has three parts. The first two can be considered together in this case.
- 1.8. Economic and social roles
- 1.9. The NPPF definition of sustainable development includes that "*sufficient land of the right type is available in the right places and at the right time to support growth and innovation*".
- 1.10. This could include the provision of land for housing. The social role specifically refers to provision of:
 - 1.11. "*a supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being*".
- 1.12. Environmental role
- 1.13. This includes:
 - contributing to protecting and enhancing our natural, built and historic environment;
 - using natural resources prudently, minimising waste and pollution; and
 - mitigating and adapting to climate change including moving to a low carbon economy
- 1.14. The site is about 2 miles from Farnham town centre. It has poor access to the town centre, a local centre, schools a GP/health facility and a train station. The nearest bus service is on A287 at the eastern end of Frensham Vale and is hourly. It therefore does not have accessible local services that reflect the community's needs and support its health, social and cultural well-being, which is specified in the NPPF social role definition of sustainable development.
- 1.15. Environmental impact
- 1.16. The Application Site is mostly wooded, Greenfield with a relatively small area of garden land. Its development would represent use of a natural resource. Sustainable development requires that natural resources are used prudently. This must mean that this type of site should only be developed if there are no alternatives which would be more sustainable. The SHLA rates the Application Site as RED and not suitable for identification as a housing site compared with many other sites.
- 1.17. The Application Site is within a relatively small area surrounded by land which is designated as AONB, AGLV or the SFASEQ. Its wooded character and appearance makes an important contribution to the environment of Frensham Vale and the setting of the designated areas.
- 1.18. The plans and information submitted with the planning application are all illustrative because the application is in outline with all matters reserved. Any grant of planning permission could not therefore be based on a detailed assessment of the impact of the proposed development. Given the sensitivity of this site, its wooded character and that it is surrounded by land with environmental designations, planning permission should not be granted in the absence of a detailed scheme.
- 1.19. The proposed development, far from integrating into this wooded area, would stand out as a densely developed treeless housing estate.
- 1.20. The Farnham Design Statement Landscape Study indicates that there could be some potential for low-density development adjacent to the settlement edge within the woodland, as long as the forest character still predominates. Otherwise, development in this segment is more likely to

have a negative landscape impact due to a combination of character, landscape quality and designations. The site layout would have this negative impact.

- 1.21. The application's Ecological Appraisal indicates that there are protected species at the site including slow worms, bats and nesting bird habitat. It proposes measures to mitigate the impact that the development would have on these. It is obvious that if the site remains undeveloped there would be no impacts at all. Therefore, the impact on ecology has to be regarded as a harm, in terms of protected species, to be taken into account in assessing the application.
- 1.22. The site lies within 5km of the Wealden Heaths SPA. Therefore, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects. The issue of effect on these SPAs does not appear to have been addressed in the application. Proposals for provision of SANG should be required on this issue in the event that Waverley were to consider granting planning permission.
- 1.23. The location of this site, remote a railway station and with a very limited bus service, would mean that in practice most access could be expected by cars. This is not desirable in terms of the Government's climate change agenda, referred to in the NPPF, since it increases the carbon footprint of the development.
- 1.24. Frensham Vale is a narrow road which carries significant traffic as confirmed in the applicant's transport assessment, which confirms that:

"You will note that traffic flows on Frensham Vale during peak periods are high"

- 1.25. Furthermore, and notwithstanding the transport assessment that the "*junctions have very substantial capacity*", local residents report that vehicles frequently queue on the road at both ends and that it is hazardous for pedestrians, including parents and children who try to walk to school.
- 1.26. The addition of almost 50 additional houses to this narrow lane with high peak period traffic flows represents a harm that would arise from the proposed development.

The proposed development is not acceptable in terms of the specific NPPF policy relating to flood risk

- 1.27. The second requirement of the NPPF for determining applications that the proposed development should not conflict with specific policies in the Framework that indicate development should be restricted. In this case the Application Site is in an area subject to flood risk which is the subject of specific NPPF policy.
- 1.28. No flood risk assessment is included with the report. Instead a Flood Risk Screening has been submitted (the FRS). The FRS does not seem to accord with the Flood Risk Map. The map shows an area of FZ3 (highest risk) covering Frensham Vale outside the access to the Application Site and spreading onto part of the site itself. The site would, therefore, appear to have an access which may not be safe, being within FZ3.
- 1.29. The planning application should include a flood risk assessment. If, as appears to be the case, the access and part of the site is within FZ3, then in line with the NPPF a sequential test would be required to demonstrate that there are no other sites less vulnerable to flooding where the proposed houses could be located.
- 1.30. Flooding is an issue where further evidence is required before this application could be considered for approval.

Other material considerations that should affect the planning decision

- 1.31. There has been tree felling this year which has removed some trees but it is still an undeveloped wooded site. Local residents are concerned that the removal of even greater numbers of trees

must have some implications for surface water drainage. This issue has not been addressed in the application and further information should be required from the applicants.

- 1.32. An application for 43 houses on land at Baker Oates Stables on Gardeners Hill Road, which is close to the site, has recently been submitted. Should Waverley conclude that planning permission should be granted for development at the Application Site then it could be expected that a similar decision could be made at the Baker Oates Stables site, and potentially other sites. The cumulative effect would be to likely to destroy the semi-rural character of Frensham Vale and have even more adverse effect on the settings of the designated areas. Plainly if land is to be released in an unplanned way to address the lack of a 5 year housing land supply, these would be more appropriate locations to grant planning permission.
- 1.33. The Local Plan process involves a proper examination of how land for housing should be identified which will continue over the next 18 months, including draft plans, public consultation and a hearing, leading to adoption of the New Local Plan early in 2016. Therefore, it is not the case that there is a shortfall in a five year supply of housing land which will not be addressed in the near future through the development plan up-date process. Granting planning permission for the proposed development would therefore be in appropriate at this stage.

Continued

A simple guide to filling in your objection on line:

Click here <http://waverweb.waverley.gov.uk/live/wbc/pwl.nsf/webdisplaypubliclist?openform>

Alternatively, cut and paste the url above into your browser window such as Internet Explorer, Chrome, Mozilla etc.

1. Enter Reference number WA/2014/1890 as seen below and click 'Find'



Planning Applications On-Line Enquiry System

Search for an application
 Recent Applications List
 Decision Pending List
 Decided List
 Appeals List
 Parish List
 Ward List
 Locality Office List
 Tree Applications
 EIA Applications

Reference: WA/2014/1890
Street:
Postcode:
Agent:
Other Text:
Number of results to display at a time: 20

[How to search](#)
[Return to Planning Pages](#)

[Waverley Planning Applications on a map](#)
[Video Tutorial #1 Basic Use](#)
[Video Tutorial #2 Viewing Plans & Documents](#)

You may search for applications or you may view certain pre-defined lists of applications. The different options work as follows:

Search for an application	Search on Application Reference, Street, Post Code, Agent name or any other text contained in the application details. For help of searching, click here .
Recent Applications List	Display the most recent applications
Decision Pending List	Display applications still awaiting a decision
Decided List	Display the most recently decided applications
Appeals List	Display applications which are subject to appeal or which have a recent appeal decision
Committee List	Display applications by the committee which will consider them
Parish List	Display applications in a given Parish. You may choose to show all applications, those decided by committee or those where a decision was delegated to officers
Ward List	Display applications in a given Ward. You may choose to show all applications, those decided by committee or those where a decision was delegated to

2. Click on the blue reference number WA/2014/1890

Search Results

1 result found	Back to search					
<table><tr><td>WA/2014/1890</td><td>20/10/2014</td><td>Agent : Neame Sutton Limited</td><td>35 Frensham Vale, Lower Bourne, Farnham GU10 3HS</td><td>Outline Application for the erection of up to 46 dwellings together with vehicular access, car parking and landscaping, following demolition of existing dwelling (all matters reserved except access).</td></tr></table>	WA/2014/1890	20/10/2014	Agent : Neame Sutton Limited	35 Frensham Vale, Lower Bourne, Farnham GU10 3HS	Outline Application for the erection of up to 46 dwellings together with vehicular access, car parking and landscaping, following demolition of existing dwelling (all matters reserved except access).	
WA/2014/1890	20/10/2014	Agent : Neame Sutton Limited	35 Frensham Vale, Lower Bourne, Farnham GU10 3HS	Outline Application for the erection of up to 46 dwellings together with vehicular access, car parking and landscaping, following demolition of existing dwelling (all matters reserved except access).		

3. Click on the blue 'On-Line Comment' box

Applicant	Mr David Neame of Neame Sutton Limited
Agent	
Received Date	30/09/2014
Valid Date	20/10/2014
Case Officer	Rachel Kellas
Phone	01483 523471
Email	planconsult@waverley.gov.uk
Site Visit	
Parish	Farnham
Ward	Farnham Bourne
Grid Ref	484325 143694
Decision Target	19/01/2015
Likely Committee Date (if required)	07/01/2015
Decision	Pending Decision
Decision Date	

Summary of Responses

Latest date for comments: 28-NOV-14

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4. Fill in the form using the instructions in the box below, obviously the box you see will be empty waiting for you to enter your objection.

Application Number	WA/2014/1890
Your Name *	<input type="text"/>
House Number/Name *	<input type="text"/>
Street *	<input type="text"/>
Town *	<input type="text"/>
Post Code *	<input type="text"/>
Telephone	<input type="text"/>
Email Address	<input type="text"/>
Do you want to	<input checked="" type="radio"/> Object to the proposal <input type="radio"/> Support the proposal <input type="radio"/> Make a general observation
Your Comment *	<p>Enter your Name, Address, Telephone Number and Email Address above. Click 'Object to proposal' button. Type in or 'Cut & Paste' your objection into this box. NB. Use your own words or voice to make it personal to you. See guidance on home page of www.frenshamvale.info - Finally, enter the code (on this page it is DG;=) and press 'Submit Comments' button below.</p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>
<p>To help us prevent improper use of this program, please enter the verification code you see below before pressing the 'Submit Comments' button. Please ignore spaces and just enter the 4 characters. D G ; =</p> <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 10px;"></div> <p>Submit Comments</p> <p>This will display a printer friendly version of your comments</p>	

A guide to filling in an objection in writing:

When sending a letter by post ([download an editable MS Word document version from Home Page](#)).

- Make it clear that you are objecting to the application
- All adults in a household can make their own individual objections
- Please add at the beginning, your own description and say why you like living here, say how long you have lived here and maybe you intend to go on doing so but perhaps not if the area is going to change through ad hoc development schemes. Refer to family or whatever your local interests are to make it personal, and show that you love and care about Frensham Vale and the local area.

Delete this entire box when you are ready to print and post to the address below

You must enter your address here

Address 1

Address 2

Address 3

Address 4

Postcode

02 December 2014

Planning Services
Waverley Borough Council
The Burys
Godalming
Surrey GU7 1HR

Dear Sirs,

**WA/2014/1890: LAND AT 35 FRENSHAM VALE, FARNHAM
OUTLINE APPLICATION FOR THE ERECTION OF UP TO 46 DWELLINGS (all matters reserved except access).**

I am writing to object to the above application on a Greenfield site and wish to make the following observations and objections.

Sustainability and Infrastructure

This site cannot be adjudged sustainable in this local semi-rural area around Frensham Vale. I have serious concerns regarding the effect of this particular Greenfield site (as well as other pending applications close by) due to insufficient local infrastructure. There is no evidence of significant improvements to local roads, air pollution, school places, doctor's surgeries, hospital beds, dentists, nurseries etc. In addition, the existing sewerage system has previously over spilt so adding more sewage will increase the threat to health.

Fig 4.9 of Surrey's Strategic Traffic Assessment Report, Sept 2014, states that Farnham has by far the worst traffic congestion in Waverley Borough, which has created very high levels of air pollution in excess of EU levels. This application adds 92 car parking spaces (plus roadside parking) which will increase pollution in Farnham. In addition, the run-off from car engines and stationary catalytic exhausts parked at 35 Frensham Vale will flow down into the river that runs alongside Frensham Vale and flows to the east into rivers delicate to environmental pollution.

The river, which is within 5 metres of the site floods in winter and therefore the large-scale tree felling required for this residential development would exacerbate this already acute problem.

Traffic using Frensham Vale turning into Frensham Road (A287), has poor sightlines as it enters this busy road. A fatal accident was recorded at this junction that provides tragic evidence of the problem directly related to poor sightlines. The weight of existing traffic already backs up at peak times resulting in a tailback along Frensham Vale which adds further pollution to the area. Similarly, traffic turning into Gardeners Hill Road also has poor sightlines and several accidents have occurred at this junction. Whilst there is provision for 'affordable housing' in this planning application it is less likely that they will have their own means of transport. The walk from 35 Frensham Vale (a very perilous walk for school children and the elderly in particular as *there is no pavement*) to the bus stop on the A287 is approximately $\frac{1}{2}$ mile (in each direction). The bus service is limited to one per hour, consequently people housed in affordable accommodation who do not own private transport are most likely to be effectively stranded and *without access to shops*.

At the heart of the NPPF is a presumption in favour of sustainable development this site and the surrounding area does not have the necessary infrastructure and is therefore not a sustainable site.

Semi-rural Nature of Frensham Vale and the surrounding area

A development of this kind is unreservedly and entirely out of character with the semi-rural nature of this area.

Trees and Wildlife

In response to the *Farnham Society* letter, dated 7th July 2014, requesting a Tree Preservation Order (TPO). The Tree Officer stated; that it would not be expedient (serve no purpose) to make a TPO on land under the control of the Forestry Commission with a Felling Licence for woodland 'thinning' (removing, one in three trees for the betterment of those remaining). Although he was aware of some clear felling and the prospect of an application for housing, he stated '*I do not consider that wholesale felling in contravention of the licence agreement is foreseeable*'. He also stated that '*The Forestry Commission have an assurance from the land owner that the area subject to the licence will not be subject to any additional felling beyond that granted consent*'.

It is evident that locating and building up to 46 dwellings on this site would require the removal of virtually all the trees except a few in the centre and on the boundaries. Such clear-felling is in contravention of the licence. If we take the authority of Government Agencies, our environment and the known bio-diversity in this location seriously, then refusal of planning permission must be the outcome.

The site adjoins ancient woodland and the required buffer zone would again result in pressure to fell more trees from the rest of the site. A few road frontage Oak trees are covered by a TPO, but due to the flooding shown on the Environment Agency's flood map as Flood Zone 3, the required construction of a substantial access road to serve this kind of development and accommodate heavy construction traffic and plant would likely cause damage to these TPO designated trees. The wooded nature of the site also provides considerable habitat for a variety of wildlife, including Brown Long-Eared bats, Slow Worms, Badgers, etc. which are protected, would mean that removal of most of the trees and construction of houses would destroy this habitat.

Most importantly, access to this site for emergency vehicles during times of flood would be, to say the least, problematic and at worst may result in loss of life.

SPAs and SANGS's

This site is within the catchment area of the Wealden Heath Special Protection Area (SPA). Suitable Alternative Natural Greenspace (SANG) should be reserved for brownfield sites elsewhere in Waverly Borough.

A note on the National Planning Policy Framework (NPPF) which states:

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF must be taken into account in the preparation of local and Neighbourhood Plans, and is a material consideration in planning decisions.

Neighbourhood Plan

The Summary Assessment of this site in the Farnham Town Council's Neighbourhood Plan Consultation document, October 2014, states:

'The site is currently occupied by a low density development in a woodland setting. Any substantial development would have an adverse impact on the dominant landscape character of the area and the setting of the southern part of the town. The site is not the most sustainable and is unsuitable for a potential housing development option'.

This should rule out any substantial residential development at 35 Frensham Vale.

In conclusion, there are more suitable housing sites in Waverly Borough with less infrastructure or immediate environmental problems; because of this 35 Frensham Vale is particularly unsuitable for development.

Yours faithfully,