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RUSHMOOR BOROUGH COUNCIL

DEVELOPMENT MANAGEMENT COMMITTEE

*at the Council Offices, Farnborough on
Thursday, 23rd April, 2026 at 7.00 pm*

To:

VOTING MEMBERS

Cllr Thomas Day (Chair)
Cllr S.J. Masterson (Vice-Chair)

Cllr Peace Essien Igodifo
Cllr A.H. Gani
Cllr C.P. Grattan

Cllr Halleh Koohestani
Cllr Dhan Sarki
Cllr Calum Stewart

Cllr Jacqui Vosper
Cllr Ivan Whitmee

NON-VOTING MEMBERS

Cllr Keith Dibble (ex-officio)

STANDING DEPUTIES

Cllr A.H. Crawford
Cllr P.J. Cullum
Cllr G.B. Lyon
Cllr Nadia Martin
Cllr Sarah Spall

Enquiries regarding this agenda should be referred to Committee Administrator, Lucy Bingham,
Democratic Services, Tel. (01252) 398128, Email lucy.bingham@rushmoor.gov.uk

A G E N D A

At its meeting on 15th April, 2026, the Development Management Committee **RESOLVED** to defer the decision on Application No. 25/00688/FULPP Devereux House, No. 69 Albert Road, Farnborough until a site visit had been carried out on 23rd April, 2026.

1. **DECLARATIONS OF INTEREST –**

All Members who have or believe that they have any interest under the Rushmoor Borough Council Councillors' Code of Conduct, adopted in April 2021, in any matter to be considered at the meeting are required to disclose that interest at the start of the meeting (preferably) or as soon as possible thereafter and to take the necessary steps in light of their interest as to any participation in the agenda item.

2. **PLANNING APPLICATIONS – (Pages 1 - 50)**

To consider the Executive Head of Property and Growth's Report No. PG2605 on planning applications recently submitted to the Council (copy attached).

The report sets out planning applications for determination at this meeting:

Item	Pages	Reference Number	Address	Recommendation
vii	5-50	25/00688/FULPP	Devereux House, No. 69 Albert Road, Farnborough	Grant subject to a s106 agreement

MEETING REPRESENTATION

Members of the public may ask to speak at the meeting, on the planning applications that are on the agenda to be determined, by writing to the Committee Administrator at the Council Offices, Farnborough by 5.00 pm on the day prior to the meeting, in accordance with the Council's adopted procedure which can be found on the Council's website at

<http://www.rushmoor.gov.uk/speakingatdevelopmentmanagement>

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**Development Management
Committee
15th April 2026**

**Executive Head of Property
& Growth
Report No. PG2609**

Planning Applications

1. Introduction

- 1.1 This report considers recent planning applications submitted to the Council, as the Local Planning Authority, for determination.

2. Sections In The Report

- 2.1 The report is divided into a number of sections:

Section A – FUTURE Items for Committee

Applications that have either been submitted some time ago but are still not ready for consideration or are recently received applications that have been received too early to be considered by Committee. The background papers for all the applications are the application details contained in the Part 1 Planning Register.

Section B – For the NOTING of any Petitions

Section C – Items for DETERMINATION

These applications are on the Agenda for a decision to be made. Each item contains a full description of the proposed development, details of the consultations undertaken and a summary of the responses received, an assessment of the proposal against current policy, a commentary and concludes with a recommendation. A short presentation with slides will be made to Committee.

Section D – Applications ALREADY DETERMINED under the Council's adopted scheme of Delegation

This lists planning applications that have already been determined by the Executive Head of Property & Growth, and where necessary with the Chairman, under the Scheme of Delegation that was approved by the Development Management Committee on 17 November 2004. These applications are not for decision and are FOR INFORMATION only.

- 2.2 All information, advice and recommendations contained in this report are understood to be correct at the time of publication. Any change in circumstances will be verbally updated at the Committee meeting. Where a recommendation is either altered or substantially amended between preparing the report and the Committee meeting, a separate sheet will be circulated at

the meeting to assist Members in following the modifications proposed. This sheet will be available to members of the public.

3. Planning Policy

- 3.1 Section 38(6) of the Town and Country Planning Act 1990 (as amended) requires regard to be had to the provisions of the development plan in the determination of planning applications. The development plan for Rushmoor comprises the Rushmoor Local Plan (February 2019), the Hampshire Minerals and Waste Plan (October 2013) and saved Policy NRM6 of the South East Plan.
- 3.2 Although not necessarily specifically referred to in the Committee report, the relevant development plan will have been used as a background document and the relevant policies taken into account in the preparation of the report on each item. Where a development does not accord with the development plan and it is proposed to recommend that planning permission be granted, the application will be advertised as a departure and this will be highlighted in the Committee report.

4. Human Rights

- 4.1 The Human Rights Act 1998 (the Act) has incorporated part of the European Convention on Human Rights into English law. All planning applications are assessed to make sure that the subsequent determination of the development proposal is compatible with the Act. If there is a potential conflict, this will be highlighted in the report on the relevant item.

5. Public Speaking

- 5.1 The Committee has agreed a scheme for the public to speak on cases due to be determined at the meeting (Planning Services report PLN0327 refers). Members of the public wishing to speak must have contacted the Meeting Coordinator in Democratic Services by 5pm on the Tuesday immediately preceding the Committee meeting. It is **not** possible to arrange to speak to the Committee at the Committee meeting itself.

6. Late Representations

- 6.1 The Council has adopted the following procedures with respect to the receipt of late representations on planning applications (Planning report PLN 0113 refers):
 - a) All properly made representations received **before** the expiry of the final closing date for comment will be summarised in the Committee report. Where such representations are received after the agenda has been published, the receipt of such representations will be reported orally and the contents summarised on the amendment sheet that is circulated at the Committee meeting. Where the

final closing date for comment falls **after** the date of the Committee meeting, this will be highlighted in the report and the recommendation caveated accordingly.

- b) Representations from both applicants and others made **after** the expiry of the final closing date for comment and received **after** the report has been published will not be accepted unless they raise a new material consideration which has not been taken into account in the preparation of the report or draws attention to an error in the report.
- c) Representations that are sent to Members should not be accepted or allowed to influence Members in the determination of any planning application unless those representations have first been submitted to the Council in the proper manner (but see (b) above).
- d) Copies of individual representations will not be circulated to members but where the requisite number of copies are provided, copies of individual representation will be placed in Members' pigeonholes.
- e) All letters of representation will be made readily available in the Committee room an hour before the Committee meeting.

7. Financial Implications

- 7.1 There are no direct financial implications arising from this report. However, in the event of an appeal, further resources will be put towards defending the Council's decision. Rarely, and in certain circumstances, decisions on planning applications may result in the Council facing an application for costs arising from a planning appeal. Officers will aim to alert Members where this may be likely and provide appropriate advice in such circumstances.

Tim Mills
Executive Head of Property & Growth

Background Papers

- *The individual planning application file (reference no. quoted in each case) Rushmoor Local Plan (Adopted Feb 2019)*
- *Current government advice and guidance contained in circulars, ministerial statements and the National Planning Practice Guidance (NPPG).*
- *Any other document specifically referred to in the report.*
- *Regional Spatial Strategy for the South East, policy NRM6: Thames Basin Heaths Special Protection Area.*
- *The National Planning Policy Framework.*
- *Hampshire Minerals and Waste Plan (2013).*

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The information, recommendations and advice contained in this report are correct as at the date of preparation, which is more than two weeks in advance of the Committee meeting. Because of these time constraints some reports may have been prepared in advance of the final date given for consultee responses or neighbour comment. Any changes or necessary updates to the report will be made orally at the Committee meeting.

Item(vii):

Case Officer	Jake Hamilton
Application No.	25/00688/FULPP
Date Valid	24 th December 2025
Expiry date of consultations	6 th February 2026
Proposal	Demolition of existing building, excluding the original façade to Devereux House which is to be retained, and construction of part two/three storey building with accommodation in the roof space to provide a care home (Use Class C2) together with parking, landscaping and associated development.
Address	Devereux House, 69 Albert Road, Farnborough, Hampshire, GU14 6SL
Ward	Knellwood
Applicant	Barcroft (Farnborough) Ltd
Agent	NWS Planning
Recommendation	Grant subject to s106 Agreement

1. Site location

The application site is located on the southern side of Albert Road, Farnborough and is host to a locally listed detached two storey building (with roofspace accommodation) which was, until December 2020, in use as a residential care home and day centre. The immediate surrounding area is largely residential in character, comprising mainly detached and semi-detached dwellinghouses, with the exception of the Bevan Lodge Nursery (67 Albert Road), located immediately to the west of the site and Farley Court, a block of purpose-built retirement homes, located to the south and fronting Church Road East.

The site is adjacent to the South Farnborough Conservation Area, which is located to the south-west.

The existing building is spans almost the entire width of the site, and is set well back from Albert Road, notably so compared to its neighbours on either side. The building is

predominantly of two storey construction with a pitched roof, with front and rear dormer windows. Whilst the front of the building, despite having been developed in three major phases, presents a fairly uniform appearance with facing brickwork, brick quoin detailing and mostly timber sash windows, the rear is less coherent, with various flat roofed elements of single and two storey construction, and external metal escape stairs, which appear to have been added at different times.

The site is served by two existing access points onto Albert Road, one of which (the eastern access) has been restricted with bollards. The forecourt includes car parking, with further parking to the rear accessed via a driveway to the western side of the building. At the rear, there is a now overgrown garden area with remains of hard and soft landscaping features. Also to the rear, and accessed via the application site, is a pair of semi-detached dwellings, known as 69a and 69b Albert Road. 69a is of single storey construction, whilst 69b contains roofspace accommodation with front and side dormers. These properties appear to pre-date the construction of the original building on the site.

The site was developed in three major phases, firstly as a private residence, constructed c1914, and known as Rosemachie. That building was subsequently converted into a cottage hospital and was opened as the Farnborough and Cove War Memorial Hospital in 1922 by Earl Haig. The building was then extended to the east in 1933 (completed 1934) with a further wing to the west added by 1963. The original central building has undergone various internal alterations including the addition of a lift shaft which removed the original staircase. The entrance lobby originally contained a Wooden Roll of Honour, installed to honour the fallen of the district during WW1. This is currently stored at the Knellwood care home, in Canterbury Road.

Albert Road has a distinctive tree-lined character. Trees are located both in the highway verge which separates the carriageway and footway and within the site itself, alongside the front boundary and the boundary with No. 73 Albert Road. There are a number of trees within the site that are protected by Tree Preservation Order (TPO) No. 439V, which is an area TPO covering land between Boundary Road, Canterbury Road, Alexandra Road and Cambridge Road East. Tree groups 28 and 29 are within, or partly within the site boundary, along with an individual tree (T21).

2. Description of proposed development

The proposed development can be described as follows:

- Demolition of existing building, with the exception of the façade of the principal element of the original building on the site, which is to be retained and incorporated into the new building
- Construction of part two/three storey building, with accommodation in the roofspace to provide new 66 bedroom care home, within use Class C2 for provision of care to the elderly
- New building to retain the original building façade and be constructed to the south of the site, aside from a new 'wing' to the east which would sit ahead of the original front building line, broadly aligning with the front of the adjacent buildings in Albert Road
- New building follows similar architectural form to existing façade to be retained
- Communal garden area at front, with landscaped walk to the east and south of the building
- Existing vehicular access to be utilised for new in and out driveway, with forecourt parking spaces and the existing access way to the western side of the building retained, leading to a further car parking area

- 22 parking spaces proposed in total, including two disabled bays and two with electric vehicle charging points, plus three dedicated parking spaces for 69a and 69b Albert Road (one each plus on shared visitor space)
- Substation and cycle store to front, near to the boundary with 73 Albert Road
- Solar panels and rooftop plant
- Refuse store and maintenance compound alongside the rear boundary with 67 Albert Road (Bevan Lodge)
- Removal of one tree group (not protected) and 4 individual trees covered by TPO 439V.

3. Relevant Planning History

There are no recent planning applications relating to the site which are considered to be of relevance to this application. Details regarding the broader history of the site and its former uses are detailed throughout the report.

4. Consultee Responses

Lead Local Flood Authority (LLFA) - Initial response received 19th February 2026:

The proposals are to utilise infiltration to manage surface water which is considered acceptable however it is noted that water reuse has not been fully considered. This is the first item on the hierarchy so further information will be required. Calculations for the infiltration tank have been provided however this indicates extremely long $\frac{1}{2}$ drain times which are not in accordance with the standards. This will need to be reviewed before we can consider that the drainage strategy is suitable for the site. In addition, calculations do not appear to have been provided for the permeable paving. Further information will also be required in relation to exceedance flow routes, and additional detail within the drainage plans i.e. cover / invert levels of the drainage features including the infiltration crates. This could be addressed by condition however the concern in relation to the $\frac{1}{2}$ drain times need to be resolved at this stage in order to demonstrate a viable drainage proposal.

Lead Local Flood Authority (LLFA) – Updated response received 5th March 2026:

There were two key elements raised in our previous response namely $\frac{1}{2}$ drain times within the calculations and adherence to the drainage hierarchy. The calculations have been updated and are now considered compliant. This demonstrates that there is a viable drainage option so we would be willing for other elements to be addressed by condition. In terms of the drainage hierarchy, the first item being water reuse has been discounted on health and safety grounds with no explanation. It has been stated that if this is insisted upon then a designer risk assessment would be required. Given that this is a requirement from the DEFRA National SuDS Standards, we would recommend that the applicant contacts Defra if this is required but as it stands, we do not consider that the drainage hierarchy has been adhered to. Further information will be required but can be dealt with by condition. It is extremely disappointing to receive the most recent response from the applicant particularly given that various water reuse systems are in use country wide.

1. No development shall begin until a detailed surface water drainage scheme for the site, has been submitted and approved in writing by the Local Planning Authority. The submitted details should include: a. A technical note demonstrating adherence to the drainage hierarchy, confirming key parameters of the drainage design and highlighting any changes to the design from that previously reviewed. b. Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations. c. Detailed drainage calculations to demonstrate existing

runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change. d. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

2. Prior to the first occupation, the following information, shall be submitted to and approved in writing by the Local Planning Authority: a. As-built drawings of the completed drainage system and a GIS shapefile of the red line boundary. b. A verification report containing as-built plans, invert levels and size of control structures and pipes, CCTV drainage survey in accordance with WRC MSCC5, commentary on any variation from approved designs and photographs of surface water drainage assets in situ to demonstrate correct construction has taken place. c. Maintenance Plan setting out the long-term maintenance arrangements including maintenance schedules for each drainage feature type, ownership, easements, the purpose of the system and restoration needs post flooding.

HCC Highways – Initial response received 13th February 2026:

Accessibility: The site is served by reasonable pedestrian infrastructure with footway provision on the southern side of Albert Road for its entire length and tactile paving at the eastern Albert Road / Alexandra Road junction. The nearest bus stops are located on Canterbury Road, to the east of the site but is only served by the route 401, which is a school route. The next closest bus stops are on Alexandra Road, located approximately 450m from the site and are served by the 1, 10 and 402 routes. The nearest train station is North Camp Station, located approximately 1.9km southeast from the site. In addition, Farnborough Station is located north of the site, approximately 2km away.

Trip Generation: A TRICS assessment has been provided and compares the existing and proposed trip generation. The 'F – Care Home (Elderly Residential)' sub land use has been used along with the 'Edge of Town Centre' and 'Suburban Area' location types for the assessments for both the existing and proposed trip generation. This approach is agreed. Existing Trip Generation The existing trip generation is 3 vehicle trips in the AM peak, 2 in the PM peak and 38 daily. Proposed Trip Generation The proposed trip generation is 12 vehicle trips in the AM peak, 10 in the PM peak and 155 daily. Net Change When compared, this shows that there is a net increase of 9 trips in the AM peak, 7 in the PM peak and a daily increase of 117 trips. This level of increase in trip generation is not anticipated to result in a significant impact to the operation of the wider local highway network.

Access: The site utilises the existing accesses from Albert Road. Albert Road is an unclassified road subject to a 30mph speed limit. An existing access to the east is not currently in use for vehicles, enforced by bollards. As a result of the proposals, this is to be reopened to provide an in / out access arrangement with the existing eastern access used for ingress and the existing western access used for egress. Alterations are proposed to the western access in that it is to be repositioned and widened to approximately 6.4m in width. Given the widths of the ingress and egress junctions, further information is required in relation to the proposed operation of the in / out access arrangement and how it will be enforced, in order to avoid vehicles accessing / egressing the site via the wrong access. The achievable pedestrian and vehicle intervisibility has been demonstrated in drawing number 240082-010 and shows y-distances of 4.3m to the left and 2.8m to the right. This is in excess of the requirement set out in HCC Technical Guidance Note 3 (TG3) however the location of the car egressing the site is likely to be closer to the left-hand kerb and therefore this visibility splay assessment should be revised. Given the expected intensification in use, it is also requested that visibility splays are shown at each of the existing accesses. The visibility splays provided should be 2.4m x 43m,

commensurate with Manual for Streets guidance for a 30mph speed limit and should comply with TG3.

Parking: Based on the provision of 66 beds and 23 FTE staff, a total of 40 parking spaces (23 for staff and 17 for visitors) are required in accordance with Rushmoor Borough Council's (RBC's) parking standards. However, it is proposed that 22 parking spaces are provided, resulting in a shortfall of 18 spaces. TRICS data has been utilised to ascertain the expected parking accumulation with the assumption of a starting accumulation of 9 vehicles (based on an expected 9 overnight staff). This assessment indicates a maximum weekday parking demand of 19 vehicles and a maximum Sunday demand of 16 vehicles. On this basis, the proposed on-site parking provision is sufficient to accommodate the expected demand. A refined dataset has also been assessed where all sites with less than 30 beds were removed. This showed a demand for 17 vehicles. Site comparisons have also been made in Table 4.7, comparing the proposed parking ratio of 0.33 with that of other local sites and shows that the proposals lie within the 15th%ile and 85th%ile values calculated from the dataset. However, no further information has been provided with regards to how these other sites operate and whether the parking provided is sufficient. Based on the accessibility of the area and the information provided with the TRICS parking accumulations the Highway Authority are satisfied that the proposed on-site parking provision is unlikely to result in any safety issues on the public highway associated with overspill parking. Notwithstanding the above, it should be noted that parking is a matter to be considered by RBC to ensure that the proposed parking arrangements accord with their adopted parking standards.

Tracking: Tracking has been provided for a refuse vehicle, fire tender and a 7.5t van accessing and egressing the site. The vehicle sizes used in the tracking provided are smaller than what is required in HCC Technical Guidance Note 2 (TG2), paragraph 3.2.6 and therefore it is requested that revised tracking is provided which accords with TG2. Further to this it is noted that the refuse vehicle is required to reverse significantly further than the recommended 12m distance and therefore the refuse collection strategy should be revised to avoid this. In addition, the tracking speed has not been provided and as such should be confirmed. In accordance with TG2, paragraph 3.2.10, vehicles should be tracked at a minimum of 10mph. In addition to the tracking requested above, tracking should also be provided which demonstrates that vehicles can safely access and egress the parking spaces provided.

Travel Plan: This Travel Plan has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of travel plans – "A Guide to Development Related Travel Plans (2025)"

The travel plan will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site.

Recommendation: The Highway Authority recommends a holding objection until further information has been provided which addresses the issues raised in this response. Should you wish to determine this application prior to these points being addressed, please contact the Highway Authority for the reasons for refusal.

HCC Highways – Updated response received 1st April 2026:

Access: As requested, revised pedestrian visibility splays have been provided with a vehicle positioned 1m to the left and shows y-distances of 3.4m to the left and 3.7m to the right. As noted in the Technical Note (TN), this is in excess of what is required in HCC Technical Guidance Note 3 (TG3) and as such is considered to be acceptable.

Visibility splays of 2.4m x 43m at each access have also been provided and are acceptable subject to being clear of any obstruction exceeding 0.6m in height. Vegetation obstructing the visibility splays has been noted in the TN and should therefore be cut back accordingly in accordance with TG3. In regard to enforcement of the in / out access arrangement, further information has been provided confirming that suitable signage will be provided to prevent vehicles from accessing or egressing the site via the wrong access. This approach is considered to be acceptable in principle, however the design of this signage should be confirmed, and this should be secured via a planning condition.

Tracking: It is proposed that fire tenders will access the site via the egress-only access in which revised tracking has been provided in drawing number 240082 TR004. Given the expected low frequencies of this movement, this arrangement is considered to be acceptable.

As requested, tracking has been provided for the car parking spaces. Whilst the vehicles tracked are smaller than the specifications detailed in HCC Technical Guidance Note 2 (TG2), paragraph 3.2.6, the Highway Authority are satisfied that the manoeuvres required to safely access and egress the parking spaces provided are achievable.

It has also been confirmed that the tracking speed for all tracking provided has been undertaken at 10mph in accordance with TG2 and therefore this matter is considered to be resolved.

Refuse Collection Strategy: Regarding the refuse vehicle tracking, it has been stated that the site will be served by a private refuse collection arrangement in which vehicles will be no greater than 8.17m in size. Given the site is private and refuse collection will be managed by a private company, it is agreed that this can be included in a Refuse Collection Management Plan (RCMP) which should be secured via a planning condition.

In addition, further information has been provided regarding the reversing distance required for refuse vehicles. Whilst it is noted that there is a footway on the southern side of the site which will segregate pedestrians from the access road and reversing refuse vehicles, this is not the case for the entirety of this section of access road.

As such it has been proposed that a banksman will be provided to manage this reversing manoeuvre. Similarly to the above, it is agreed that the details of this can be secured in a RCMP.

Travel Plan: Regarding the Travel Plan, the revisions made address our previous response and as such this is agreed and will need to be secured via a S106 agreement.

Recommendation: The Highway Authority therefore have no objection to the proposals subject to the following S106 Obligation and planning conditions:

S106 Obligations:

- The agreed Travel Plan and associated £1,500 approval fee, £15,000 monitoring fee and £15,811.40 cash deposit / bond should be secured via a S106 agreement

Planning Conditions:

- Before the development is brought into use, the means of vehicular access to the site shall be constructed in accordance with the approved plan and no structure, erection or planting exceeding 0.6m in height shall thereafter be placed within the visibility splays shown on the approved plans.

Reason: To ensure a suitable access and layout in the interests of highway safety.

- Prior to occupation the area shown on the approved plan for the parking and turning of vehicles shall be provided and reserved for these purposes at all times.

Reason: To ensure that vehicles parked on the site are able to enter and leave in forward gear

- Prior to the development being brought into use, a Refuse Collection Management Plan should be provided to include details on the proposed refuse vehicle size and the use of a banksman to assist with manoeuvring through the site. The development should operate in accordance with the Refuse Collection Management Plan for the lifetime of the development, unless otherwise agreed in writing by the Local Authority.

- Prior to the use of the vehicle accesses, design detail of the in / out signage should be provided and agreed with the Local Authority.

Reason: To ensure that suitable enforcement signage is provided and avoid vehicles from accessing or egressing the site via the wrong access

- No development shall take place, (including any works of demolition), until a Construction Method Statement has been submitted to, and approved in writing by, the LPA. The approved statement shall include scaled drawings illustrating the provision for – 1) The parking of site operatives and visitors vehicles. 2) Loading and unloading of plant and materials. 3) Management of construction traffic and access routes. 4) Storage of plant and materials used in constructing the development. 5) Wheel washing facilities.

Reason: In the interests of highway safety.

Thames Water (summary):

Thames Water would advise that with regard to the FOUL WATER network capacity, we would not have any objection to the above planning application, based on the information provided.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

RBC Ecologist:

No objections raised subject to conditions, summary of response contained within the Biodiversity section of this report.

Farnborough Airport Safeguarding Officer:

Feedback from the external review has just been received and I can confirm that we have no objection to the application due to the height increase.

However, having read through the plans there looks to be a photovoltaic element with final locations on the rooftop to be confirmed, once the plans have been finalised for this we would need an aviation glint and glare study to be carried out and sent to us for review due to the proximity to the runway, for the review it is worth noting that a 3.5 degree glide slope angle should be used.

Also, method of construction would need careful consideration as the use of cranes in this

location will prove difficult.

RBC Environmental Health Officer (summary):

Contaminated Land: The report undertakes a non-targeted inspection of the land and was not accompanied by any Phase 1 assessment. A Phase 1 assessment would be expected to include a site walkover report and a hazardous material identification report for the building together with a preliminary conceptual site model.

As a comment on the existing report, I was unable to determine which results were attributable to specific sampling points. I would ask the report is amended to make this clear. In relation to the elevated PAHs it would assist if there was further comment on this, for example whether or not this was attributable to asphalted parking/ roadway or if it may have been associated with some other activity on the site.

Although there is sufficient information to determine the application in principle a full assessment of contaminated land is required (to be secured by condition).

Noise: In relation to noise, a plant noise assessment is provided. Provided any plant installed conforms to the specification and operational standards that are contained within the report then we have no objection to the proposal. From experience, delivery and waste collection can also give rise to disturbance to neighbours. Both these matters can be controlled by condition.

Air Noise: The site appears to be located either just within the 54- 56.9 LAeq 16hour or the 57-59.9 LAeq 16 hour noise contour for the Farnborough Airport Summer Day Noise Contours 2040 With Development as shown in Figure 8.2.15 of the [Flightpath 2040, Appendix 8.2 - Air Noise part 3 of 4, April 2024](#) . That application was made in 2023 and remains extant. While the scheme is not yet determined it is the stated ambition of the Farnborough airport forming part of their masterplan. As such it is a material planning consideration. Therefore, a condition is recommended.

Waste Storage Facilities: Given that it is proposed to have a 66 bedroom property it is not clear that there is sufficient general and clinical waste storage at the site. There is a balance between storage volume and collection frequency. However, it is recommended that a scheme which includes waste storage and collection frequency is included as a reserved matter for approval.

RBC Parks Officer:

I assume that this application does not attract S106 [Public Open Space] POS allocations. I have no other comments or concerns.

RBC Tree Officer:

Category C trees should not be regarded as a constraint against development according to Industry Best Practice BS5837 (Trees and Development). You may decide to waive the requirement to replace the lost trees as establishment may be challenging under the canopy of others due to light competition unless of course there are potential planting sites elsewhere on the development. Otherwise, I offer no objection subject to the development being carried out in accordance with the submitted tree protection details.

Hampshire and Isle of Wight Fire Service:

Considered that the project appears to involve a planning application deemed to present a low to medium level of risk and referred to standing advice.

5. Neighbours notified

Two site notices were displayed, and an advertisement was published in the local press. A total of 120 individual letters of notification were sent to properties in Albert Road, Canterbury Road, Canterbury Walk, Gainsborough Close and Church Road East.

Neighbour comments

At the time of writing, a total of 30 representations have been received. Of these, 28 are recorded as objections. No representations have been received in support.

A summary of the points raised is provided below:

Principle/Need

- Whilst development is no doubt needed it appears to be a case of private profit and public debt with residents suffering the inconvenience
- Pleased to see the site being brought back into use but object to the development
- Support redevelopment of the site but ask the planning committee to ensure it is not overdeveloped
- There is already a significant number of care homes in Aldershot and Farnborough and not aware that there is a current shortage
- Devereux House should instead be refurbished, upgraded and brought up to date
- Seek allocation of at least 6 beds to local people at a more reasonable rate

Design and impact on character

- Site is located in a residential area with predominantly houses, and the proposal is not in keeping
- Planning Statement states that the existing frontage is largely screened with trees and vegetation – this is not the case and only a small percentage (to the left) is
- Building is unsightly (ugly) with three and four storey high blank brickwork – these walls will be visually prominent and unattractive
- Front building line should be set back to existing position
- Reducing the scale of the building would also reduce the overlooking
- Proposed building is over dominant in the street scene

Amount and scale of development

- Overdevelopment of the site
- Proposal is more than three times the size of the previous home and will cover virtually the entire site
- Estimated increase in Gross Internal Area of some 250-300%
- 66 bedrooms is excessive
- Scale of development does not comply with statements made in the submission (it is higher than suggested)
- Building is higher than the existing Devereux House and other buildings in the local area including Farley Court
- Has much larger footprint than the existing building

- Significantly higher than the nearest house (No. 73 Albert Road)
- The building protrudes closer to Albert Road – although in line with adjacent houses it is much further forward than existing
- Site not large enough to accommodate the proposal and all parking, utility use and access for emergency services etc.
- Scale of proposals not based on practical capacity for the site (it is based on requirement for rooms and number of residents to be profitable)
- Part three/four storey scale represents a gross overdevelopment
- Four storey building is visually dominant in incongruous
- Proposal would cause material harm to visual amenity through excessive an scale and bulky built form that is incongruous with the established suburban character
- Deep footprint and resultant massing extend well beyond neighbouring building lines
- Proposals maximise rather than respond to local context
- Would erode the suburban character of the site
- Fails to demonstrate that the development has been designed from a robust character appraisal or constraints led approach as would be expected to evidence compliance with Policy DE1 (reinforced by national policy)
-

Heritage impacts

- Only a small portion of the façade is to be retained but the heritage status applies to the whole building. More of the façade should be retained
- Façade retention is a superficial gesture – it does not preserve the asset itself
- Insufficient justification has been provided to
- Policy HE2 and the SPD require a robust options appraisal showing how the building could be retained and adapted
- The proposals start from a redevelopment premise rather than demonstrating that retention has been exhausted (failing to meet the HE2 test)
- The provision of a care home does not automatically equate to public benefits of a kind and scale that justify the loss of a locally listed heritage asset
- Benefits do not outweigh the harm
- The proposal fails to conserve and does not enhance the significance and character of a locally listed heritage asset as required by HE1
- Proposal results in the significant loss of a non-designated heritage asset
- Approach is insensitive to the historic and communal value of the building
- Preserving the façade will not happen based on the submitted drawings – question whether the retention is technically possible (and be compliant with Building Regulations)
- The existing building is a war memorial hospital – its demolition will be an insult to the brave and fallen men and women of the area
- Harm to heritage and history of the building is extreme
- Original building will be lost rather than highlighted
- Building gifted to the people of Farnborough after construction
- Façade retention is not the same as conserving the significance of the building and should be resisted
- Concern that the old memorial hospital will be used to promote private enterprise
- Memorial Board is currently stored at Knellwood (having been rescued when the home closed) and is accessible to member of the public and an annual remembrance service has continued – concern that this is unlikely to continue if the board is placed in the new building
- Suggest that the Board is retained at Knellwood along with the second world war memorial board held there

Quality of accommodation

- External amenity space too limited to accommodate events and higher demand at weekends
- Residents appear to be contained to each floor
- Query if there is an internal lounge for visitors
- Query adequacy of staff facilities

Impact on residential amenity

- Angled windows to the eastern elevation will overlook adjoining gardens from first and second floor levels
- Windows will directly overlook adjacent gardens at 73 and 75 Albert Road, causing a loss of privacy and affecting the use of private gardens
- Potential for direct inter-visibility between the care home and the windows of No. 73 resulting in a loss of privacy, exacerbated by the number of rooms and patterns of occupation associated with a care home meaning effects are likely to be persistent rather than occasional
- Building would be visually dominant, enclosing and overbearing to neighbouring gardens and result in a loss of light (including evening light)
- Loss of outlook – dominating principal outlooks from No. 73
- General increased noise and disturbance including through traffic and deliveries
- Loss of light (daylight and sunlight)
- Building is overbearing to neighbours, and height is intrusive to residents
- Plant noise not acceptable
- Access path to 96a/b Albert Road will be cut off by parking spaces and a gate, with a 1.8m high fence enclosing the footpath access restricting access and light to the path and light to side windows to 69a
- Loss of outlook and increased sense of enclosure for neighbours
- Farley Court will be dwarfed by the development, leading to loss of privacy in communal gardens and impacting outlook from some flats
- Intensified activity including more comings and goings, staff and visitor presence, internal activity visible in multiple windows would diminish the role of the garden to No. 73 as a private amenity space as well as living conditions in the dwelling.

Impact on trees

- Building closer to the road will result in the unnecessary felling of trees
- Trees will be desecrated
- Loss of mature tree cover and future pressure for pruning and management due to building footprint and proximity should be challenged
- This will result in significant environmental and aesthetic harm
- Removal of trees is directly contrary to Policy NE3
- It has not been demonstrated that the visual and townscape function of the established trees will be replicated with replacement planting

Biodiversity including BNG

- Object to loss of flora and fauna on site
- Proposal would result in an overall net deficit of biodiversity which is incompatible with Policy NE4, and failing to deliver Biodiversity Net Gain
- Insufficient detail has been provided in relation to off-site enhancement, and the

- proposal fails to demonstrate compliance with the mitigation hierarchy
- Off-site enhancement has been treated as the primary solution rather than a final step supported by evidence

Parking/Highways

- Number of parking spaces proposed is inadequate to meet the needs of the development
- Prior usage of the site was for 16 residents with 13 parking spaces, only 9 more spaces are proposed for an extra 50 residents
- 22 parking spaces for 66 bedrooms is inadequate (including 4 for disabled users and with EV points) and insufficient for staff and visitors
- Application states that the parking provision should be 40 spaces (which is itself likely to be an underestimate) and 22 is a massive under provision resulting in parking pressure and highway safety concerns
- Similar sites in TRICS data with 60-70 residents have 31 and 34 spaces
- Estimate requirement to be between 60 and 80 spaces
- Whilst residents will not have their own cars, the high level of visitor and staff traffic will be substantially different – sustainable transport modes will not be used
- Anticipated number of staff (70) is an underestimate
- Transport Statement considers that there is residual capacity in Albert Road to accommodate some parking demand, but Albert Road is clearly too narrow to accommodate on-street parking on a regular basis and is restricted by yellow lines
- Will cause nuisance parking in Albert Road, blocking through traffic and increasing safety risks, also causing difficulties for refuse collections
- Development will cause congestion in Albert Road (and surrounding roads), in conjunction with the nursery which is very busy with cars, parents and young children morning and afternoon
- Deliveries to the site will cause congestion and obstruction
- Albert Road used as a connecting road with drivers often speeding
- On-street parking would impede access for emergency vehicles
- Pedestrian environment in Albert Road is poor (poor lighting and overhanging trees) with residents often using the road instead of the footway due to safety concerns
- Given restrictions in Albert Road (and Canterbury Road) where will visitors or staff be expected to park?
- Grass verges in the highway in Albert Road and Belvedere Road have already been ruined by car parking
- Increase in vehicular traffic as set out in the Transport Statement will be significant – the development should be reduced in size
- Intensification in the use of the access to Albert Road (already used by flats at rear and Bevan Lodge)
- Presentation of traffic collision data in the submission is misleading (reported as no locations in which more than 5 collisions have occurred)
- Concerns regarding functionality of internal layout, particularly for access by emergency vehicles given tightness of parking areas and manoeuvring space
- Surrounding residential roads should not be used for parking by the development
- When site is redeveloped and Bevan Lodge pre-school parents can no longer use it for drop off and pick up this will place additional parking pressure on-street and in surrounding roads
- Poor access for fire engines to east and south elevations
- The combination of an under provision of car parking on site and reliance on constrained on street conditions creates a credible mechanism for severe cumulative impacts
- There is not compelling evidence that a Travel Plan will neutralise the parking shortfall

Drainage/Sewerage

- Plans to use existing drainage and sewerage infrastructure – how will this cope with the increase in residents, staff and visitors?
- Existing surface water flooding issues in Albert Road

Construction impacts

- There will be considerable disruption during construction, placing additional pressure on a narrow residential street
- Increase in travel, deliveries, noise, dust, workers parking etc. and a smaller development would reduce these impacts
- Request a Construction Management Plan to protect residents from noise, dust and hazardous traffic routing
- Mitigations should be secured as required by Policy DE10

Procedural matters

- Consultation period inadequate [Officer comment: the application has been publicised in accordance with the statutory requirements]

Other matters (not material to the determination of the application)

- May impact on staffing at other care homes in the area due to the high demand for carers in the sector
- Will affect property values
- Loss of shortcut from Farley Court across the Devereux House site through to Albert Road presents an enhanced safety risk for residents
- Concern that the legacy of Knellwood and all it stands for, will be adversely compromised by the proposed 66 bedded building with no history and no legacy.

6. Policy and determining issues

The application site is located within the defined built-up area of Farnborough and is adjacent to the South Farnborough Conservation Area. Conservation Areas are designated heritage assets that are defined in legislation as areas “*of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*”. However, Conservation Area designation does not prohibit development, but rather seeks to ensure that any proposed changes within are in keeping with the area’s special character; and that development beyond their boundaries does not materially harm their setting.

The existing building on the site is locally listed, being a building, structure or feature which the Council feels is of local importance because of its architectural, historical or environmental significance. Locally listed buildings are categorised as non-designated heritage assets, as defined in the National Planning Policy Framework (NPPF).

Adopted Rushmoor Local Plan Policies IN2 (Transport), HE1 (Heritage), HE2 (Demolition of a Heritage Asset), HE3 (Development within or adjoining a conservation area), DE1 (Design in the Built Environment), DE4 (Sustainable Water Use), DE6 (Open Space, Sport and Recreation), DE10 (Pollution), LN1 (Housing Mix), LN4 (Specialist and Supported Accommodation), NE1 (Thames Basin Heaths Special Protection Area), NE2 (Green Infrastructure including ‘Green Corridors’), NE3 (Trees and Landscaping), NE4 (Biodiversity),

and NE8 (Sustainable Drainage Systems) are relevant.

Also relevant is the Council's adopted Supplementary Planning Documents (SPDs) "Parking Standards" adopted in December 2023; "Locally Listed Heritage Assets" adopted December 2020; and the Thames Basin Heaths Special Protection Area Avoidance & Mitigation Strategy in its most recent form April 2024. Since these SPDs have been subject to extensive public consultation and amendment before being adopted by the Council, some significant weight can be attached to the requirements of these documents.

The advice contained in the National Planning Policy Framework (NPPF: December 2024) and National Planning Policy Guidance (NPPG) is also relevant. The NPPG notes that *"Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets..."*; and that *"In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time."* The principal judgements to be made in assessing development proposals affecting 'heritage assets' are to (a) define the 'significance' of the asset; and then (b) the extent of the harm (if any) that would arise to the asset. The NPPG defines 'significance as: *"...the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting."* The NPPG further states that: *"heritage interest may be archaeological, architectural, artistic or historic."*

NPPF Section 16 *"Conserving and enhancing the historic environment"* is particularly relevant given the various 'heritage assets' on and in the vicinity of the application site. NPPF Para. 202 states that: *"Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."*

Then Para.208: *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*

In respect of non-designated heritage assets, NPPF Para.216 says: *"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

The NPPF also acknowledges that development can have beneficial impacts upon heritage assets, stating at Para.219: *"Local planning authorities should look for opportunities for new development within Conservation Areas....., and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."*

Housing Land Supply: The Rushmoor Local Plan was adopted on 21st February 2019. It

identifies an objectively assessed housing need (OAHN) of 436 net new dwellings per annum in Rushmoor for the period 2014-2032.

As of 1st April 2025, the Rushmoor Local Plan is over five years old. The National Planning Policy Framework confirms that where strategic policies are more than five years old, the supply should be demonstrated against 'local housing need', which should be calculated using the standard method set out in National Planning Practice Guidance.

As of March 2026, the minimum annual local housing need figure for Rushmoor, as calculated using the standard method, is 598.65 dwellings per annum. Applying an additional buffer of 5%, as required by the National Planning Policy Framework, the requirement rises to 628.58 dwellings per annum (3,143 dwellings over five years).

The Council published the latest five-year housing land supply for the period 2025-2030 (1st April 2025 - 31st March 2030) on 18th March 2026. This confirms that Rushmoor has an overall supply of identifiable and deliverable housing land for 2,979 net new dwellings). This equates to a housing land supply of 4.74 years and for the purposes of assessing relevant planning applications, this means that the presumption in favour of sustainable development may apply.

In its guidance on how to calculate a five-year housing land supply, the National Planning Practice Guidance (NPPG) states that local planning authorities 'need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply' (Housing Supply and Delivery; para. 026, ref. ID: 68-035-20190722). The Housing Delivery Test Measurement Rule Book (December 2024) also makes clear that communal accommodation plays an important role in contributing to overall housing delivery. The Council has therefore reviewed recent permissions, completions and planning applications for accommodation in C2 use. In determining the level of housing contribution that C2 uses make to the housing land supply, the Council recognises that an individual bed space may not necessarily replace an individual unit of C3 accommodation. For residential institutions, the NPPG (Housing for Older and Disabled People; para. 016a, ref. ID: 63-016a-20190626) states that 'to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data'. At the time of its completion, the 2021 Census estimated that there were 80,871 adults (aged 16 or over) within 39,303 households in Rushmoor. This provides a ratio of 2.1 adults per household. The number of dwellings generated by accommodation in C2 use can therefore be derived by dividing the number of bed spaces by 2.1.

The NPPF advises in paragraph 11d) that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (including in instances where a five-year housing land supply cannot be demonstrated), permission should be granted unless:

- i) the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for refusing the development proposed; or
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

This proposal would provide a net increase of 50 care bed spaces on the site. This is equivalent to 24 new dwellings and represents a moderate contribution to the supply of housing in

Rushmoor. This will be considered in the overall planning balance set out in the conclusion of this report, having regard to the presumption in favour of sustainable development.

In the context of the above-mentioned considerations, the main determining issues in respect of the application are considered to be as follows:

- Principle and land use
- Heritage impact
- Design and impact on local character
- Impact on neighbours
- The living environment created
- Highways impacts
- Drainage issues
- Ground contamination
- Trees
- Impacts on wildlife & Biodiversity Net Gain
- Trees
- Public Open Space
- Public Sector Equality Duty
- Other issues

7. Assessment

7.1 Principle and land use

The site was, until the end of 2020, in operation as a day centre and residential care home for up to 16 people aged 65 and over. However, it is stated that the existing accommodation was no longer fit for purpose. The proposal is for a new, purpose-built residential care home to provide 66 care bedrooms for residents requiring nursing, dementia or residential care, resulting in a net increase of 50 bed spaces on the site.

The Planning Practice Guidance (Paragraph: 001 Reference ID: 63-001-20190626) states that the need to provide housing for older people is critical.

Policy LN4 of the Local Plan states that Proposals for housing designed specifically to meet the identified needs of older people and others with a need for specialist housing, including specialist housing with care, will be permitted where:

1. Sites are appropriately located in terms of access to facilities, services and public transport; and
2. An appropriate tenure mix is provided

The site is located approximately 1.6km walking distance from Farnborough Town Centre and is accessible by a range of modes of transport with bus stops on Alexandra Road some 420m away, serving routes 1 and 10 (and school services on the 410) to a range of destinations including Farnborough, Aldershot, Fleet and Camberley. Rail services are available from Farnborough Main and North Camp, both approximately 2km away. It is therefore considered that the site is appropriately located, based on the criteria set out in Policy LN4. Given the specific nature of the accommodation proposed which would comprise care bedrooms with en-suites, rather than self-contained units of accommodation, it is not considered appropriate to seek a mix of tenures.

The contribution that the proposal would make to the supply of housing in the Borough has been considered earlier in this report. In this instance, the proposal would provide specialist accommodation for older persons requiring nursing, dementia or residential care and whilst, in accordance with Policy LN4 there is no requirement to demonstrate a need for the type of accommodation proposed, the applicant has provided a Care Home Need Assessment to support the application, which seeks to demonstrate that there is an unmet need for care bedspaces in the Borough in assessing the supply of specialist care home provision in the Borough against statistical demand. The Assessment concludes that there is currently an outstanding need for 119 care bed spaces in the Borough of Rushmoor, which is forecast to increase to 177 by 2030.

The Council has been monitoring the delivery of Class C2 bedspaces in the Borough over the Local Plan period. Overall, 218 new bedspaces have been completed, but 60 bedspaces have been lost (including through change of use from C2 to C3), so there has been a net gain of 158 bedspaces. In comparison to the Local Plan targets, the Plan (p. 150) notes from the Strategic Housing Market Assessment (SHMA) that there is a registered care need for 2,160 places across the Hart, Rushmoor and Surrey Heath housing market area between 2014 and 2032. This is derived from residential care and nursing care, with the SHMA noting a requirement of around 120 'units' per annum (p. 213, para. 14.19). Table 14.10 in the SHMA shows that there's a need of 739 'units' for residential care and nursing care between 2014 and 2035 in Rushmoor, which equates to around 35 units a year, or 630 units between 2014 and 2032.

It is currently the 12th year of the Local Plan period, so this would equate to a requirement of 420 bedspaces being delivered by the end of March 2026 based on an even delivery trajectory of 35 bedspaces a year and it could therefore be concluded that there is a need for the places at Devereux House, considering the net gain so far of 158 bedspaces.

Whilst the SHMA does note that caution should be exercised when interpreting the requirement numbers (for example, suggesting that more older people will likely be cared for in their own homes than captured by the numbers) in this case it is relevant to note that the proposals would provide accommodation for residents requiring nursing, dementia, and residential care, where the nature and level of care required is considered more likely to be of a more specialist nature.

In principle, it is considered that the redevelopment of the site to provide a replacement care home is acceptable having regard to Policy LN4.

7.2 Heritage Impact

The building that is the subject of the application is locally listed and is therefore a non-designated heritage asset as defined in the NPPF.

Local Plan policy HE1 states that proposals for development that affect heritage assets (designated and non-designated) should conserve and enhance the significance, special interest and character and appearance of the heritage asset and its setting, particularly those that are recognised as having an intrinsic link to the military or aviation history of the Borough. Policy HE1 requires (in summary) proposals which affect heritage assets to provide a heritage impact statement to assess the significance of the asset and its setting, set out the impact of the development on the asset and demonstrating how the proposals have taken into account that assessment and suggested mitigation measures.

Policy HE1 goes on to state that when considering proposals that affect the significance of

non-designated heritage assets, a balanced judgement will be made having regard to the significance of the asset, the scale of any harm and the public benefits of the development.

Policy HE2 states that the demolition or partial demolition of a heritage asset, particularly those with an intrinsic link to the aviation or military history of the Borough, will not be permitted unless every practical effort has been made to retain it, the loss of the asset is necessary to achieve public benefits, those public benefits outweigh the loss, and it is demonstrated that the new development will proceed within a reasonable and agreed timescale. The more significant the asset, the greater the public benefits required, and demolition of nationally important assets of the highest significance should be wholly exceptional.

NPPF Paragraph 216 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Paragraph 217 goes on to state that Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

As required by Policy HE1, the application includes a heritage impact statement, which considers the significance of the asset, the impact of the proposed development and how the proposals have taken into account the assessment of the impact on the significance of the asset.

The building was added to the local list on 26th March 2012. The heritage asset survey carried out by the Council in support of the listing states as follows:

“c1914 house with major extensions in the mid/late 20th century. Opened as the Farnborough and Cove War Memorial Hospital in 1922 by Earl Haig and closed in 1975. Now a day care centre. Red brick, clay and concrete tile roof. Original 2-storey, 3-bay building now forms part of a very large 15 window, 2-storey plus attic range. Original central hospital building is red brick in Flemish bond with additions in stretcher bond. Entrance doorway (now blocked) with barrel projecting door canopy on brackets flanked by double-height canted bay windows. Modern lift overrun projects centrally from roofline between original dormers. Horned vertical sliding sash windows 12 panes over single light. Five dormers with paired windows to front elevation. Flat roofed additions generally of no special local interest to rear.”

The heritage assessment submitted with the application notes that an existing building was taken, which had been constructed in the Queen Anne Revival style of the early 20th century and was converted into a cottage hospital, rather than being purpose built. The assessment considers that the 1930s extension which was added in response to a need to expand the hospital, was designed as a neo-Georgian frontage, with references to the original building in the form of brick quoins, roof tiles and windows helped to harmonise the extension with the original building, although internally it was more contemporary to the 1930s with art-deco style staircases. The western wing is considered to be more muted and more functional in appearance, with smaller windows on the ground floor and differentiated with the use of a different colour brick to the original building, but still tied together through architectural detailing.

The assessment concludes that the building does hold some architectural interest but has been subject to continual adaptation. It also has historic associative interest as a building supported by the community in memory of those who lost their lives in the First World War and the desire to express their grief through a positive response as a living memorial and also holds

historic illustrative interest of how healthcare changed and developed during the 20th century. It can be considered therefore that the heritage significance of the existing building is in this case defined not just by its architectural interest, but its function and role as a memorial hospital, as well as a record of how healthcare has changed and developed over the 20th century.

In considering the impact of the proposals, the assessment acknowledges that the development would see the demolition of the majority of the original early 20th century building and the later mid-20th century wings. The façade is proposed to be retained, and this comprises the most interesting architectural features of the building with its Queen Anne Revival door canopy and canted bay windows. The assessment considers that the building has already been subject to substantial changes to its fabric, both internally (with the loss of the original staircase and entrance lobby for example) and externally with the loss of the original front door, central attic dormer and the blocking of original fenestration on the gable ends as a consequence of the later wings that were added. In summary, it is noted that the building has been continually adapted to address the changing needs and demands of health care.

The proposals would involve the demolition of the majority of the original early 20th century building, and the later wings added to each side. The heritage statement considers that the original cottage hospital was subject to substantial extensions that were not subservient to the original building, although the façade of the earliest part of the building will be retained and incorporated into the new scheme. The new building has been designed to sit harmoniously with the retained façade through the repetition and mirroring of form, architectural details and use of materials. The scheme responds to the historic interest with its links to the commemoration of those who fell during the First World War with the Roll of Honour, which is proposed to be located within the new entrance. The assessment considers that the original aspiration for the site to be a positive living memorial that is linked to health care will continue.

Assessment

It is considered that the significance of the building is derived from two elements: firstly the age and the architectural merit of the building, and secondly its historic significance as a war memorial hospital and as a representation of how healthcare provision has changed over time.

The building originally started life as a private residence, constructed in the early 20th century, and comprising just the central section of the building as it stands today. The heritage asset survey carried out by the Council in support of the local listing of the building focuses on the features of the original central hospital building, identifying the use of Flemish bond brickwork (with the extensions to either side utilising a more standard stretcher bond), the barrel projecting door canopy over the entrance and the double-height canted bay windows. The central, modern lift overrun which projects from the roof is also noted. The flat roofed additions to the rear are disregarded, being of no special local interest.

Whilst the front elevation of the existing Devereux House does, when viewed from the street, initially appear cohesive and a complete built form, closer inspection reveals the differences in construction and materials between the different phases. It is also the case that alterations previously undertaken, including the removal of the original internal staircase and the addition of an unsightly lift shaft in the front roof slope, have affected the integrity of the original building.

It could be considered that the proposed development represents the latest chapter in the life of the original building, which has been adapted and extended over the years in response to the changing demands and requirements of healthcare provision. Since being surplus to

requirements as a hospital, the building had continued to serve the local community in providing day care and residential accommodation for the elderly until its closure at the end of 2020.

The building has been vacant since that time and the applicant states that it is no longer capable of meeting the requirements of the Care Quality Commission (CQC) and that the only way to bring the site back into use as a care home would be through a purpose-built building to be constructed to the required standard.

The proposed development would retain the existing façade, with the new building constructed behind and to the front/side by way of a new north wing. The new development would provide an appropriate response to the original Devereux House in terms of its design and use of materials (including red brickwork walls, quoin detailing, brick plinth and bay windows with protruding stone sills), but would, through the use of glazed curtain walling between the retained façade and the new northern wing, to enable the old and new to be clearly differentiated.

The new northern wing would be of a similar scale to the existing Devereux House, but beyond this the proposed building would be of a greater scale, providing accommodation over four floors (three storeys with accommodation in the roofspace). However, the stepping back of the massing in this way would still enable the scale of the original early 20th century dwelling to be interpreted. A new central dormer, of the same scale and design as the existing two in the original roofslope, would replace the existing unsightly lift shaft.

With regard to the historic significance of the building as a war memorial hospital, it is considered that this is primarily derived from the former use of the building and the Roll of Honour memorial board that was originally displayed in the lobby. The building has not been used as a hospital for some time and, following its closure, the Roll of Honour has been stored elsewhere. It is proposed that the board will be re-instated in the new building, with access available for members of the public and this can be secured by condition.

Concerns have been raised regarding the location of, and access to the Roll of Honour in the public comments. It has been suggested that it should be located elsewhere and that the use of the board by a commercial operation is not acceptable. It is however considered that the retention of the board within the new building would be an appropriate way to continue to commemorate the site and its history as a former war memorial hospital, and to enable continued access to the Roll of Honour for members of the public into the future.

The proposals will result in the loss of the vast majority of the existing building on the site. It is noted that the application has not been supported by a structural survey, marketing evidence or any information relating to grant funding, as set out in the supporting text to Policy HE2 at paragraph 9.24.

Policy HE2 states that the demolition or partial demolition of a heritage asset, particularly those with an intrinsic link to the aviation or military history of the Borough, will not be permitted unless every practical effort has been made to retain it, the loss of the asset is necessary to achieve public benefits, those public benefits outweigh the loss, and it is demonstrated that the new development will proceed within a reasonable and agreed timescale. The more significant the asset, the greater the public benefits required, and demolition of nationally important assets of the highest significance should be wholly exceptional.

In accordance with the NPPF, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

As set out elsewhere in this report, it is considered that there is a need for the provision of specialist older persons accommodation within the Borough. There is broad policy support for this type of accommodation and given that the last lawful use of the site was for this purpose, the Council would not wish to see its loss for other uses. The applicant submits that the re-use of the existing building for this purpose would not meet current standards set by the CQC and therefore that a redevelopment is the only way to bring the site back into that use.

Rather than proposing its total loss, the development will retain the façade of the original element, which will be incorporated into the new development. This will impact detrimentally upon the significance of the non-designated heritage asset that is derived through the historic building fabric, although that is tempered somewhat by the extent to which the original building has been enlarged and adapted over the years, in response to the changing requirements of what was ultimately a functional building.

By virtue of the fact that the original building will for the most part, no longer remain, the significance derived from its function and status as a war memorial hospital will be diminished, although the retention of the original façade will enable the history of the site to continue to be interpreted, together with the installation of the Roll of Honour board back within the new building.

These factors will be considered in the overall planning balance, as set out in the conclusion of the report. In the event that planning permission is granted, a condition would need to be imposed to ensure that the development proceeds within a reasonable timescale following demolition works.

Impact on the South Farnborough Conservation Area

A small section of the site adjoins the north-eastern corner of the South Farnborough Conservation Area, and any proposals for the redevelopment of the site could affect the setting of this designated heritage asset, particularly when viewed from properties in Fairfax Mews and Church Circle. Given the proposed increase in the amount and scale of development on the site, the proposal could have a greater impact than the existing development, but the new building would still be reasonably well separated from the Conservation Area boundary and would be a more cohesive built form than the existing Devereux House when viewed to the rear. Accordingly, it is considered that the character and appearance of the adjacent Conservation Area would be preserved.

7.3 Design and impact on local character

Local Plan Policy DE1 requires new development to make a positive contribution towards improving the quality of the built environment. As required by Policy DE1, the application includes a design and access statement which sets out how the wider existing context has been factored into the proposals.

Albert Road is predominantly characterised by detached and semi-detached dwellings of two storeys in height (some with roofspace accommodation). The existing Devereux House occupies a large plot and is set much further back within it than its neighbours to either side, being somewhat anomalous in Albert Road in this regard.

The front elevation of the existing building has a linear quality, spanning almost the entire width of the site and positioned close to the boundary with No. 73 Albert Road. The design of the existing building has been assessed in the preceding section, but does in summary contain

interesting period architectural features, albeit that the form and scale of the original element of the building has arguably been somewhat lost due to the later additions. It is considered that the proposal would provide an appropriate response to the retained element of the existing building on the site, in terms of its architectural detailing and for the most part, the choice of external facing materials. It is disappointing to note that casement upvc windows are proposed, rather than the sash type found in the majority of the existing building, but the Design and Access Statement explains that this type of window is proposed in order to meet CQC requirements for a 100mm restricted opening, with vertical sash windows not being suitable for the proposed end user, being harder to open and with greater risk of injury on closing than casements. Full details of the external facing materials can be secured by planning condition in the event that planning permission is granted, including details of windows to ensure that the frames are of a suitable quality.

The proposed development would result in a significant increase in the extent of site coverage, projecting much further to the rear than existing, and further forward within the site by way of the new northern wing, although that element would not project ahead of the general front building line in Albert Road and would be of a lower height than the main building mass behind, helping to limit its visual impact. Additional space is proposed to the eastern flank boundary adjacent No. 73, with the new building being positioned around 9m from it and 15m to the flank wall of No. 73. The principal elevation of the new front wing will face west at 90 degrees to the retained front elevation of Devereux House, and will incorporate design features to complement it with a canted bays, quoin detailing and dormer windows. This does mean that the 'front' elevation of the northern wing facing Albert Road will have the appearance of a flank wall, but suitable visual interest is provided with the inclusion of windows and the external chimney breast.

The proposed development would have a stepped massing, remaining at two storeys with roofspace accommodation to the new northern wing, rising to three storeys with roofspace accommodation beyond. Whilst it is considered that the site is large enough to accommodate the additional massing, the development will appear much larger in scale than the neighbouring buildings which are no more than two storeys in height and has the potential to appear visually dominant, when compared to the existing building on the site. However, the main bulk of the building will continue to be well set back within the site which will help to limit its visual impact in the street scene and overall, it is not considered that the development would result in a significantly harmful impact on local character.

The proposals include a suitable landscaping scheme which incorporates the majority of existing trees on the site (tree works are considered in detail elsewhere in this report), with a new communal external area proposed to the front of the new building, and a landscaped area to the side and rear of the building featuring a 'woodland walk'.

Overall, it is not considered that the development would have an unacceptable impact on local character, when considered against Policy DE1.

7.4 Impact upon neighbours

Local Plan Policy DE1 requires all new development to make a positive contribution towards improving the quality of the built environment. With particular regard to residential amenity, point (c) requires development to not cause harm to the proposed, existing and/or adjacent users by reason of loss of light, privacy or outlook, and noise, light pollution, vibration, smell or air pollution.

When considering impacts upon neighbours, the basic question for the Council to consider is

whether or not the impacts of the proposed development on the amenities of neighbouring properties, especially residential neighbours, would be both materially and harmfully impacted in planning terms. The correct test in this respect is whether or not existing neighbouring properties would, as a result of the proposed development, maintain acceptable amenities to meet the needs of residential occupation. It is not the role of the Planning system to defend neighbours against the loss of any private views from their properties where these views are derived from over adjoining land not in their ownership. In terms of privacy concerns, a degree of mutual overlooking often exists between neighbours and this is considered both normal and acceptable. It is necessary for the Council to consider whether or not occupiers of neighbouring properties would be subjected to unacceptable undue overlooking rather than any overlooking at all.

As described in the preceding section, the proposal would result in a significant increase in the amount of development on the site, in terms of the extent of site coverage, and the overall bulk, scale and mass of development on the site. As a consequence, the development has the potential to result in visual impacts, overbearing and loss of daylight and sunlight and overshadowing. Given the increase in the level of potential occupancy on the site, the development will also result in a significant increase in the number of windows facing towards neighbouring properties and has the potential to result in overlooking and a consequent loss of privacy.

It is not considered that the properties on the opposite (northern) side of Albert Road will be harmfully impacted by the proposed building itself, given the separation distances involved, and the immediate neighbour to the west is Bevan Lodge which is a non-residential property.

Daylight, sunlight and overshadowing impacts

The application includes a Daylight and Sunlight Assessment, which has been prepared with reference to the Building Research Establishment (BRE) Guidelines "Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice 2022". Where a new development can block light to existing homes, daylight assessment for planning is usually based around the vertical sky component (VSC) with and without the new development. This is a measure of the amount of diffuse daylight reaching a window. If the layout of a property is known, the effect on the daylight distribution in the existing rooms can also be analysed. Overshadowing, or loss of sunlight to existing premises, is analysed using annual probable sunlight hours (APSH). This is a measure of how much sunlight the window can receive with and without the new development.

Whilst the BRE guidance is not an instrument of planning policy, it is an established method of determining the likely effects of development proposals with regard to daylight and sunlight impacts and it is therefore pertinent to consider the results of the submitted Assessment in reviewing the impacts of the development on the amenities of neighbouring residential properties.

The assessment considers the impacts on properties at Farley Court, 67, 69a, 69b and 73 Albert Road and 3 Gainsborough Close. All others were determined to be more remote from the development and were not considered in the assessment.

The results of the assessment found that with regard to VSC, of the 64 windows that were tested (whether known as habitable rooms or not) 62 windows (97%) of these windows will fully meet the BRE criteria by virtue of the fact that the results are within 20% of the baseline figure. The report states that 2 windows did not automatically meet the guideline, one at Farley Court and the other at 69a Albert Road, but that they are either within 2% of the target figure

and still achieve 21.64% VSC, which the assessment considers are borderline with minor impact, or are poorly lit in the existing situation and fail as existing i.e. 7.49% VSC. 43 rooms were tested for VSC and 42 pass (98%). The assessment concludes that the overall VSC result is considered to be acceptable and compliant with the BRE guidelines.

The results of the daylight distribution (DD) analysis conclude that of 43 rooms tested, 39 pass (91%) and meet the BRE target value of 80% of their former value and the majority in any event are above the 80% well-lit target. The contour plots confirm the light distribution into the room and this is derived from the amount of sky that is visible. Of the 4 rooms that do not meet the BRE guideline (3 at Farley Court and 1 at 69a Albert Road), the assessment considers that they still receive excellent light to the majority of the room, (i.e. 73%, 72%, 56% of the space is well-lit and only reduced by 3% to 6% of the existing levels so well within the permissible 20% on the other assessment criteria). The assessment concludes that the overall DD result is acceptable and compliant with the BRE guidelines. With regard to the Annual Probable Sunlight Hours assessment, the Assessment confirms that all of the properties tested pass.

The BRE suggests that for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March (Spring Equinox). The 2022 BRE Guidelines then go on to suggest that if, as a result of new development, an existing garden or amenity area (external receptor) does not meet the guidance, or the area which can receive some sun on the 21st March is less than 0.8 times its former value then the loss of sunlight is likely to be noticeable. The assessment concludes that the amenity spaces tested meet these requirements, with none being less than 0.8 times their former value.

Notwithstanding the conclusions of the Daylight and Sunlight Assessment, it is inevitable that, given the increase in the scale of built development on the site, neighbouring properties are likely to experience a sense of additional overshadowing as a result of the proposal, particularly those to the east of the site in the latter part of the day, and this is illustrated in the shadow study diagrams submitted with the Assessment.

Overlooking and loss of privacy

The proposed development introduces a significant number of new windows which would face towards neighbouring properties in Albert Road, Gainsborough Close, Canterbury Road and Church Road East. The site is fairly level, and therefore the impacts would be expected to arise from windows at first floor level and above, the majority of which will serve the new care bedrooms and would therefore have the potential to result in overlooking and a loss of privacy to neighbours. The accommodation within the roofspace of the building at third floor level will not include any windows, apart from two roof lights in the rear roofslope serving the hair salon and activities room.

Within the western flank elevation, six upper floor bedroom windows (two of which would be smaller secondary windows towards the rear of the building) and four windows serving internal circulation space, would face towards the rear garden area to the Bevan Lodge pre-school and properties in Gainsborough Close beyond. These properties are already overlooked by the existing upper floor windows in Devereux House and it is not considered that the development would result in a significantly greater impact in terms of overlooking and loss of privacy.

Within the southern (rear) elevation, a total of seven bedrooms and a lounge on each of the first and second floors would face towards Farley Court, which itself has a large number of habitable room windows facing north towards the site. Additionally, two roof windows are proposed in the southern roofslope as described above. The development would result in an

increase in the perception of mutual overlooking to Farley Court and its rear garden area, but there is existing tree screening and a minimum separation of 23m would be maintained between the buildings at their closest point. Accordingly, it is considered that the relationship with Farley Court would be acceptable in terms of privacy.

The nearest properties to the south are at 69a and 69b Albert Road, a pair of dwellings which immediately adjoin the site and would be around 8.7m from the new building at the closest point. The proposed development would have the potential to overlook these dwellings, but the nearest windows in this part of the new building would be smaller, secondary bedroom windows and windows serving the stairwell in the south-eastern corner, all of which would be fitted with obscure glazing to prevent any actual or perceived overlooking without comprising the quality of accommodation for future occupiers. There are lounge windows which would also face south towards these properties, but these are positioned further away from the boundary and views out would be partially obscured by the small three storey 'wing' containing the bedrooms referred to earlier in this paragraph.

There may be potential for some angled views towards Fairfax Mews to the south-west but the buildings are well separated from one another, and it is not considered that an unacceptable loss of privacy will arise.

The eastern flank elevation contains a significant number of windows at first and second floor level serving 8 bedrooms on each floor and a stairwell at each end. Beyond the rear building line to the adjacent dwelling at No. 73, the upper floor windows are of an oriel type, which would project out beyond the main wall of the building, with the window openings positioned at a 45 degree angle facing to the south-east. This would limit direct views out of the respective bedrooms and help to reduce the potential for overlooking, but it would not completely eradicate it or indeed the perception of overlooking to neighbouring properties, particularly the private rear gardens to Nos. 73 and 75 Albert Road and the rearmost sections of the gardens to 70 and 72 Canterbury Road.

The effect of the proposed oriel windows would mean that properties to the south-east in Canterbury Walk would have windows angled towards them, but the nearest windows in the south-east corner of the building would serve a stairwell and could be obscure glazed, and coupled with the existing evergreen tree screening along the boundary and separation distance to the other windows beyond, it is not considered that an unacceptable impact would arise.

The dwellings at 70 and 72 Canterbury Road would have a direct back-to-back relationship with the new building but would be well separated, with a minimum of 40m between them.

The building would introduce new bedroom windows alongside the flank wall of No. 73 Albert Road, which itself has two habitable room windows at ground floor level, with a small single window serving a study and a larger window serving a kitchen/diner, and upper floor non-habitable room windows serving a stairwell and bathroom. The occupiers of this property also utilise the area to the side of the dwelling as part of their private amenity space. The proposed building would introduce four bedroom windows in total at first and second floor level, along with two windows serving the stairwell at first floor level. The flank walls of the buildings would have a minimum separation of 15m between each other.

These windows would have the potential to result in overlooking towards the flank windows in No. 73, and the side garden area, and consequently have the potential to result in a loss of privacy for the occupiers of this dwelling. There are two existing upper floor flank windows in the existing building, which face towards the rear garden of No. 73 at approximately 1.5m from the boundary. Although there is currently no overlooking as the building is not occupied, there

would be the potential for this to occur should it be brought back into use. The new building would be positioned further away from the boundary with No. 73 (between 8.4m and 9m as a result of the slight taper of the boundary) and as described above, the new upper floor windows beyond the rear building line of No. 73 would be angled to reduce the potential for direct overlooking. Whilst this would be an improvement upon the existing the situation in terms of the effect on the rear garden, the new flank bedroom windows would result in overlooking and a loss of privacy to the side garden area, as well as the potential for views into the ground floor habitable room windows mentioned above, which does not currently exist at present.

Given the separation distance and the existence of trees both within the site and in Albert Road it is not considered that the properties to the north on the opposite side of the road would experience an unacceptable loss of privacy from the development.

Visual impact

As has been mentioned elsewhere in this report, the proposal would result in a significant increase in the amount, bulk and scale of built form on the site, which has the potential to appear overbearing and result in a harmful visual impact upon the residential properties surrounding the site. The main three storey (plus roofspace) massing of the building would be located towards the middle and rear sections of the site, where there is the potential to impact on Farley Court to the south, 69a 69b Albert Road also to the south, and the properties immediately to the east including 73 and 75 Albert Road and 70 and 72 Canterbury Road.

Although the building will result in a different outlook for the occupiers of Farley Court, it is considered that the buildings would be sufficiently well separated from one another, and that the building would be far enough from the shared boundary, that the development would not result in an unacceptable visual impact.

It is considered that the building would also be sufficiently well separated from Nos. 70 and 72 Canterbury Road and would not result an unacceptable visual impact.

The new building would result in a considerable depth of built form at three storeys in height, projecting beyond the rear of No. 73 Albert Road, of greater height and depth than the existing structure, but it would be positioned further from the boundary which would help to soften the impact of the additional massing. The new northern wing of the building would be directly visible from inside the dwelling at No. 73 through the existing flank windows mentioned above in relation to privacy, and would result in a greater visual impact given that these windows currently have an unobstructed view (save for existing trees) across the site frontage. However, the building is of two storeys (plus accommodation in the roof) at this point and there would be an approximate separation between the buildings of 15m which, notwithstanding the concerns raised regarding privacy and overlooking, would be considered an acceptable flank-to-flank relationship in a suburban area in terms of visual impact.

Given the separation distance to No. 75 Albert Road, it is not considered that the building would have a harmful visual impact or appear unduly overbearing.

The proposed building will result in built development much closer to Nos. 69a and 69b Albert Road, which are themselves of relatively modest scale, being predominantly of single storey construction, and could be somewhat dwarfed by the proposals. 69a has windows in the ground floor elevation which face north towards the site but the building would not be positioned directly in front of them and would not directly obscure views out, which would lessen the visual impact. 69b also has windows that face north, including dormer windows which it is assumed would serve bedrooms, but these are positioned further back from the

boundary with the site and again the proposed building would not be directly in front of them. For both properties, although the building will be positioned away from the boundary the development is likely to result in a greater sense of enclosure given the greater scale of development towards the rear of the site than currently exists.

Noise and disturbance

The proposals involve a significant increase in the level of residential occupation on the site compared to the existing/former care home on the site (were it to be brought back into use), which together with the associated activity including comings and goings by staff and visitors, deliveries and waste collection, would have the potential to impact detrimentally on the amenities of the occupiers of neighbouring residential properties.

Most of the vehicular activity would be concentrated to the site frontage and to the western site boundary, with the proposed delivery bay and refuse store located on this side of the site alongside the less sensitive (in residential amenity terms) Bevan Lodge day nursery. This would keep the majority of the activity away from the more sensitive eastern and southern boundaries which adjoin residential properties. There would be a concentration of activity in the south-western corner of the site, which is proposed to be used for parking, but this part of the site has previously been used for this purpose.

The Environmental Health Officer (EHO) has reviewed the submission and recommended conditions to manage the timings of deliveries and waste collection to manage the potential impact on neighbours. With regard to the rooftop plant, the application is accompanied by a plant noise assessment which has also been reviewed by the EHO, who has confirmed that provided any plant installed conforms to the specification and operational standards that are contained within the report there is no objection to the proposal.

No details have been provided in relation to the proposed sub-station to be positioned at the front of the site and any proposed means of enclosure – it is therefore recommended that further details are secured by planning condition.

Residential amenity - summary

In summary, it is considered that although the proposed development would have an acceptable relationship with the majority of neighbouring properties, there remains the potential for actual and perceived overlooking from the new upper floor bedroom windows in the eastern flank wall and the development is likely to appear overbearing to some properties, particularly 69 a and b Albert Road. Although the harm is in part limited by the design of the building and the use of angled windows, this will not completely mitigate the potential impacts. There is also the potential for direct overlooking and a loss of privacy to No. 73 Albert Road. The amenity harm will need to be considered in the overall planning balance, which will be set out in the conclusion of this report.

7.5 The living environment created

The application proposes specialist older persons accommodation within use class C2. Accordingly, the internal space standards set out at Policy DE2 of the Local Plan would not be applicable. However, in general terms the development would still be expected to provide an adequate level of accommodation for its intended occupation, having regard to the specific requirements of the end users. The application details state that the proposals have been designed to meet the requirements of the CQC.

The development comprises 66 individual en-suite bedrooms with communal lounge and dining areas, and leisure facilities including a cinema and hair salon. External communal amenity space is to be provided to the front of the building. The majority of the ground floor bedrooms would have access to individual external amenity areas to the sides and rear of the building. Comments have been received from local residents raising concerns that the outdoor space provided for future occupiers is not sufficient, however this is considered to be a matter for the care home operator in the absence of any specific planning standards in this regard.

The Council's Environmental Health Officer has reviewed the application and given its proximity to Farnborough Airport, recommends that a Noise Insulation Scheme, informed by a Noise Impact Assessment, is submitted to and approved by the Council before the commencement of development above ground floor slab level. This is to ensure a satisfactory living environment for future occupiers.

Subject to the above, it is considered that the living environment created would be acceptable in planning terms.

7.6 Highways impacts

Adopted Local Plan Policy IN2 states that development will be permitted that; integrates with the existing movement network, provides safe, suitable and convenient access for all potential users, and does not have a severe impact upon the operation of, safety of, or accessibility to the local or strategic road network. NPPF paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Public Highway Access

The site is currently served by a single vehicular access point onto Albert Road, to the west of the site. An existing access to the east is not currently in use for vehicles, enforced by bollards. It is proposed to reopen the eastern access as part of the proposals, to provide an in and out driveway arrangement with the eastern access used for ingress and the western access used for egress. Further information was requested by the Highway authority regarding the accesses, including how the in/out arrangement would be enforced, and a revision to the visibility splay information provided. Following receipt of further information in response, no further objections have been raised by the Highway Authority. The in/out arrangements would be secured by condition.

Trip generation

A TRICS assessment has been provided and compares the existing and proposed trip generation. The 'F – Care Home (Elderly Residential)' sub land use has been used along with the 'Edge of Town Centre' and 'Suburban Area' location types for the assessments for both the existing and proposed trip generation. This approach is acceptable to the Highway Authority. The existing trip generation is 3 vehicle trips in the AM peak, 2 in the PM peak and 38 daily. The proposed trip generation is 12 vehicle trips in the AM peak, 10 in the PM peak and 155 daily. In comparison, this shows that there is a net increase of 9 trips in the AM peak, 7 in the PM peak and a daily increase of 117 trips. This level of increase in trip generation is not anticipated to result in a significant impact to the operation of the wider local highway network.

Parking Provision

Based on the provision of 66 beds and 23 FTE staff, a total of 40 parking spaces (23 for staff and 17 for visitors) are required in accordance with the Council's parking standards. However, a total of 22 parking spaces are provided, resulting in a shortfall of 18 spaces. TRICS data has been used to determine the expected parking accumulation with the assumption of a starting accumulation of 9 vehicles (based on an expected 9 overnight staff).

The assessment indicates a maximum weekday parking demand of 19 vehicles and a maximum Sunday demand of 16 vehicles. On this basis, the proposed on-site parking provision is stated to be sufficient to accommodate the expected demand. A refined dataset has also been assessed where all sites with less than 30 beds were removed. This showed a demand for 17 vehicles. Site comparisons have also been made in Table 4.7, comparing the proposed parking ratio of 0.33 with that of other local sites and shows that the proposals lie within the 15th percentile and 85th percentile values calculated from the dataset. However, no further information has been provided with regards to how these other sites operate and whether the parking provided is sufficient.

Fundamentally, there is no further space within the site to accommodate additional car parking, and whilst the provision falls significantly short of the level required by the Council's SPD, the Highway Authority has concluded that based on the accessibility of the area and the information provided with the TRICS parking accumulations they are satisfied that the proposed on-site parking provision is unlikely to result in any safety issues on the public highway associated with overspill parking.

The acceptability of the parking provision is ultimately a matter for the Council to assess, and whilst it is clear that the level of parking would not be compliant with the Council's standards, the key consideration is the effect that any shortfall of on-site parking against those standards may have on conditions of road safety. Given the advice from the Highway Authority on that point, it is not considered that planning permission should be refused on highways grounds in this instance, having regard to NPPF paragraph 116. It is also considered that the implementation of the Travel Plan will encourage the use of sustainable travel modes to help reduce the reliance on car travel to and from the site.

The Transport Statement confirms that two active Electric Vehicle charging bays are proposed, along with four passive bays (with cable routes to enable future EV charging provision) which would accord with the SPD requirements.

A total of 10 cycle parking spaces are proposed within the on-site cycle store (located to the front of the site), which would exceed the anticipated demand as determined in accordance with the SPD (being 4 spaces based on an average of 23 FTE staff on site at any one time).

Travel Plan: Following the submission of a revised Travel Plan no objections have been raised by the Highway Authority, subject to it being secured in the S106 agreement.

Bin Storage & Collection: Refuse collection is proposed to be undertaken by a private company. Although initial concerns were raised by the Highway Authority regarding the ability of larger refuse vehicles to manoeuvre within the site, the applicant has offered to restrict the size of vehicle as part of a refuse management plan, which would also include further commitments regarding the use of an on-site banksman to assist with reversing manoeuvres.

It is considered that the proposals do not conflict with Government policy/guidance, adopted Local Plan Policy IN2, and the Council's adopted Car and Cycle SPD and are, as such, acceptable in highways terms.

7.7 Drainage issues

The making of drainage connections to a development is subject to licencing (with Thames Water) that is subject to entirely separate consideration under other legislation and, as such, is not a matter for direct and technical consideration by the Council with a planning application. Nevertheless, adopted Local Plan Policy NE8 (Sustainable Drainage Systems) requires that developments include the implementation of integrated and maintainable Sustainable Urban Drainage Systems (SUDS) in all flood zones for both brownfield and greenfield sites. For Green field developments, the peak run-off rate/volume from the development to any drain, sewer, or surface water body for the 1 in 1 year and 1 in 100 years must not exceed the greenfield run off rate for the same event. For brownfield sites, the peak run-off rate/ volume from the development shall be as close as reasonably practicable to the greenfield run-off event.

The site is located within Flood Zone 1 and, as such, fluvial flood risk is considered to be low.

The proposals are to utilise infiltration to manage surface water which is considered acceptable however it is noted that water reuse has not been fully considered. This is the first item on the hierarchy so further information will be required. Updated calculations have been provided which are now considered to be compliant, which demonstrates that there is a viable drainage option. Accordingly, the Lead Local Flood Authority have confirmed that other elements can be addressed by condition.

In terms of the drainage hierarchy, the first item being water reuse has been discounted on health and safety grounds with no explanation. It has been stated that if this is insisted upon then a designer risk assessment would be required. Given that this is a requirement from the DEFRA National SUDS Standards, the LLFA would recommend that the applicant contacts DEFRA if this is required but as it stands, it is not considered that the drainage hierarchy has been adhered to. Further information will be required but can be dealt with by condition.

In the circumstances, subject to the imposition of appropriately worded conditions to require details of the proposed SUDS drainage system prior to commencement, and confirmation of its installation prior to first occupation, it is considered that the proposals would meet the requirements of adopted Local Plan Policy NE8.

7.8 Ground contamination

Local Plan Policy DE10 concerns pollution and states that development will be permitted provided that it does not give rise to, or would be subject to, unacceptable levels of pollution and it is satisfactorily demonstrated that any adverse impacts of pollution, either arising from the proposed development or impacting on proposed sensitive development or the natural environment will be adequately mitigated or otherwise minimised to an acceptable level.

The supporting text para 9.100 states that whilst Rushmoor may not have a history of heavy industry, there has still been a diversity of land use over the years, some of which may have left a legacy of contamination. This contamination may be associated with industrial processes or activities that have long ceased operating and are no longer evident. However, it can often be present on greenfield sites and can arise from natural sources as well as from human activities. Soils and groundwater impacted by contamination can present a threat to health and the environment and may preclude some classes of development from taking place. It is therefore vital that such sites are investigated, and if necessary remediated, to ensure that future users are not adversely affected.

The application includes a Phase 2: Site Investigation Report, which has been reviewed by the Council's Environmental Health Officer. Although it was considered that there is sufficient information regarding contaminated land to be able to determine the application, a full assessment is required which can be secured by condition, to ensure that the site is safe for the development and use proposed and in the interest of amenity and pollution prevention.

7.9 Impacts on Wildlife & Biodiversity Net Gain

Thames Basin Heaths Special Protection Area (SPA)

The European Court of Justice judgement in 'People Over Wind, Peter Sweetman v Coillte Teoranta C-323/17' in April 2018 established the legal principle that a full appropriate assessment (AA) must be carried out for all planning applications involving a net gain in residential units in areas affected by the Thames Basin Heaths SPA, and that this process cannot take into account any proposed measures to mitigate any likely impact at the assessment stage. This process, culminating in the Council's Appropriate Assessment of the proposals, is overall described as Habitats Regulation Assessment (HRA).

Undertaking the HRA process is the responsibility of the decision maker (in this case, Rushmoor Borough Council) as the 'Competent Authority' for the purposes of the Habitats Regulations. The following paragraphs comprise the Council's HRA in this case:-

HRA Screening Assessment under Regulation 63(1)(a) of the Habitats Regulations: The Thames Basin Heaths SPA is designated under the E.C Birds Directive for its lowland heathland bird populations. The site supports important breeding bird populations, especially Nightjar *Caprimulgus europaeus* and Woodlark *Lullula arborea*, both of which nest on the ground, often at the woodland/heathland edge; and Dartford Warbler *Sylvia undata*, which often nests in gorse *Ulex* sp. Scattered trees and scrub are used for roosting.

Heathland is prone to nitrogen deposition due to increases in Nitrogen Oxide. Calculations undertaken for the Rushmoor Borough Council Local Plan found that there will be no in-combination impacts on the habitats as a result of development in the Local Plan, including an allowance for 'windfall' housing developments. However within the screening process it will need to be ascertained whether development outside the Local Plan within 200m of the SPA will increase vehicle movements to above 1000 extra trips/day or exceed the Minimum Critical Load by over 1% either alone or in-combination with the Local Plan.

The bird populations and nests are very prone to recreational disturbance, with birds vacating the nests if disturbed by members of the public. This leaves the young unprotected and increases the risk of predation. Dogs not only disturb the adults, but can directly predate the young.

Visitor surveys have shown that the visitor catchment area for the Thames Basin Heath SPA is 5km, with any proposals for residential development within this catchment contributing to recreational pressure on the SPA. The research also evidenced that residential development within 400m of the SPA would cause impacts alone due to cat predation of adult and young birds.

The retained South East Plan Policy NRM6 and adopted New Rushmoor Local Plan (2014-2032) Policy NE1 (Thames Basin Heaths Special Protection Area) and Thames Basin Heaths Avoidance & Mitigation Strategy (2019)], state that residential development within 400m of the SPA should be refused and development within 5km of the SPA should provide Strategic

Alternative Natural Greenspace (SANG) of 8ha/1000 additional population and contributions to Strategic Access Management and Monitoring Measures (SAMM) dependant on the number of bedrooms.

It is considered that there is sufficient information available with the planning application provided by the applicants with which the Council can undertake the HRA process. In this case the proposed development involves the creation of a 66 bedroom care home for the elderly within the Farnborough urban area. As such, the proposed development is located within the 5km zone of influence of the SPA but outside the 400-metre exclusion zone. The proposed development is neither connected to, nor necessary to the management of, the Thames Basin Heaths SPA. Furthermore, the proposed development would not result in a net increase in traffic movements in excess of 1000 vehicular movements per day in proximity to the SPA.

All new housing development within 5 km of any part of the Thames Basin Heaths SPA, of which the current proposals would make a contribution, is considered to contribute towards an impact on the integrity and nature conservation interests of the SPA. This is as a result of increased recreation disturbance in combination with other housing development in the vicinity of the Thames Basin Heaths SPA. Current and emerging future Development Plan documents for the area set out the scale and distribution of new housebuilding in the area up to 2032. A significant quantity of new housing development also results from 'windfall' sites, i.e. sites that are not identified and allocated within Development Plans. There are, therefore, clearly other plans or projects for new residential development that would, together with the proposals the subject of the current planning application, have an 'in-combination' effect on the SPA. On this basis it is clear that the proposals would be likely to lead to a significant effect on European site (i.e. the Thames Basin Heaths SPA) integrity.

Appropriate Assessment under Regulation 63(1) of the Habitats Regulations: If there are any potential significant impacts upon the Thames Basin Heaths SPA, the applicant must suggest avoidance and/or mitigation measures to allow an Appropriate Assessment to be made. The Applicant must also provide details that demonstrate any long term management, maintenance and funding of any such solution.

The project the subject of the current planning application being assessed would result in a net increase of residential accommodation within 5 km of a boundary of part of the Thames Basin Heaths SPA. In line with Natural England guidance and adopted New Rushmoor Local Plan Policy NE1 and Thames Basin Heaths Avoidance & Mitigation Strategy (2019), a permanent significant effect on the SPA due to an increase in recreational disturbance as a result of the proposed new development is likely.

Rushmoor Borough Council formally adopted the latest version of the Thames Basin Heaths SPA Avoidance & Mitigation Strategy (AMS) in 2021. The AMS provides a strategic solution to ensure the requirements of the Habitats Regulations are met with regard to the in-combination effects of increased recreational pressure on the Thames Basin Heaths SPA arising from new residential development. This Strategy is a partnership approach to addressing the issue that has been endorsed by Natural England.

The AMS comprises two elements. Firstly, the maintenance of Suitable Alternative Natural Greenspace (SANG) in order to divert additional recreational pressure away from the SPA; and, secondly, the maintenance of a range of Strategic Access Management and Monitoring Measures (SAMMs) to avoid displacing visitors from one part of the SPA to another and to minimize the impact of visitors on the SPA. Natural England raises no objection to proposals for new residential development in the form of Standing Advice provided that the mitigation and avoidance measures are in accordance with the AMS.

In order to meet the requirements of Policy NE1 and the AMS applicants would ordinarily be expected to secure an allocation of SPA mitigation capacity from either the Council's SANGS schemes, or from another source acceptable to Natural England and to the Council; and secure the appropriate SANG and/or SAMP in perpetuity by making the requisite financial contribution(s) by entering into a satisfactory s106 Planning Obligation that requires the payment of the contribution(s) upon the first implementation of the proposed development.

These requirements would normally be expected to be met to the satisfaction of Natural England and Rushmoor Borough Council (the Competent Authority) before the point of decision of the planning application.

However in this instance, the applicant has sought to demonstrate that, due to the specialist nature of the accommodation proposed and the specific care requirements of future occupiers, a significant impact on the Thames Basin Heaths SPA is considered to be highly unlikely to occur, on the basis that residents are likely to require full time care and will not be of a mobility level to be able to independently visit the SPA.

Whilst this may be the case, it is dependent on the future occupiers of the development meeting the test regarding mobility and it is therefore considered necessary to ensure that controls are in place to prevent occupation by future residents who may require lower levels of care and/or have the ability to travel independently to the SPA, with a suitable mechanism in place to require SPA mitigation should this occur. Indeed, the supporting text to Local Plan Policy LN4 (Specialist and Supported Accommodation) states that Policy NE1 may apply if the potential for increased recreation cannot be ruled out.

As such, in order to be lawfully permitted, the proposed development will need to be subject to a suitably worded planning obligation which ensures that residents are verified as being of limited mobility prior to occupation, with a requirement that evidence of such verification be available upon request. The obligation would also need to include a mechanism to secure the necessary avoidance and mitigation measures in the event that the first obligation is breached.

Given the nature of the accommodation proposed, it is also considered necessary to prevent live-in staff, who might have the potential to visit the SPA. This can be secured by planning condition.

Conclusions of Appropriate Assessment : On this basis, the Council are satisfied that, subject to the receipt of a satisfactory completed s106 Planning Obligation, the applicants will have avoided an adverse impact on the Thames Basin Heaths SPA, and will in the event that there is any breach regarding occupation requirements, be obliged to secure satisfactory mitigation for the impact of their proposed development on the Thames Basin Heaths SPA in perpetuity in compliance with the requirements of Rushmoor Local Plan Policy NE1 and the AMS. Accordingly, it is considered that planning permission could then be granted for the proposed development on SPA grounds.

On-Site Protected species

General Assessment: The application includes a Preliminary Ecological Appraisal (Nov 2025) which considers the existing site conditions and its suitability to support protected species. The site was found to hold below average suitability to support Great Crested Newts and no records of GCN within the 2km search area were returned. The vast majority of the site is considered to be unfavourable for reptiles. There was no evidence of badgers at the site. The site is considered to be sub-optimal for Hazel Dormice.

Bats: All species of bat and their roosts are protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017, as amended. They are afforded additional protection under the Wildlife and Countryside Act 1981, making it an offence to kill, injure or disturb an individual; damage, destroy or obstruct access to a breeding site or resting place of that individual. Destruction of a bat roost is an offence, regardless of whether a bat is present at the time of roost removal. The Local Planning Authority has a legal duty under Regulation 9(3) of the Conservation of Habitats and Species Regulations 2017 which requires that *“a competent authority in exercising any of its functions, must have regard to the requirements of the Directives so far as they may be affected by the exercise of those function”*.

Several trees are scheduled for felling to facilitate development. None of these trees have been identified as hosting active bat roosts, but some potential roost features are present. Trees should be felled under the watch of an ecological clerk of works in accordance with a precautionary working method statement, in line with best practice, in order to avoid breach of protected species legislation.

Building 1 (Devereux House) was identified as hosting 2 low status active roosts for common pipistrelle, during emergence surveys undertaken in summer 2023. These surveys are now too old to be relied upon as accurate. A single updated survey was undertaken in July 2025. This survey did not identify the roosts as still active, but it may be argued that a single survey is insufficient survey effort. It is therefore appropriate to assume that the building still hosts at least 2 low status roosts which would be subject to loss or disturbance as a result of proposed development works. Works must therefore be undertaken in accordance with a Protected Species Licence from Natural England which must be secured after planning permission is obtained and prior to the commencement of any works at site that may affect the roosts. It is expected that Natural England will require further bat emergence surveys to be submitted to in evidence to fully characterise roost type before the licence is issued. Dependant on the results of further bat emergence surveys, it is likely that the Natural England Protected Species Licence will accord with the proposed scheme of mitigation and compensation set out in paragraph 6.7 of the above referenced Preliminary Roost Assessment and Bat Emergence Survey Report.

Building 2 (brick outbuilding) was subject to adequate survey effort and was identified as not hosting active roosts. A protected species licence is therefore not required for works to building 2. However, bats are highly mobile and move roost sites frequently. Unidentified bat roosts may still present within Building 2. A precautionary approach to works should therefore be implemented in line with best practice guidance.

Works affecting potential roost features should be dismantled by hand to ensure any bats which may be sheltering beneath them will not be harmed. These works should ideally be timed to avoid the hibernation season (November to February inclusive). If a bat is seen work should cease immediately and advice sought from Natural England or a qualified specialist. The applicant should be aware of the requirement to apply for a bat mitigation licence for any activity that may adversely impact on a potential bat roost or disturb bats, in order to avoid contravention of the above referenced legislation.

Building 3 (wooden shed) was identified as having negligible potential for active bat roosts. Bats and their roosts are therefore not a constraint for works on building 3.

Active bat roosts are known to be present at the development site. Bats are sensitive to any increase in artificial lighting of their roosting and foraging places and commuting routes. Paragraph 198 of the National Planning Policy Framework 2019 states that planning policies

and decisions should “limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation”.

The applicant should ensure that the proposed development will result in no net increase in external artificial lighting at the development site, in order to comply with above referenced legislation and the recommendations in BCT & ILP (2023) Guidance Note 08/23. Bats and artificial lighting at night. Bats and the Built Environment. Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby”.

Biodiversity Net Gain (BNG)

The applicant is aware of their need to demonstrate that they adhere to both the planning and Biodiversity Net Gain mitigation hierarchies when considering the design of their scheme. The applicant states that they have had full regards to these mitigation hierarchies and sets out a series of design constraints to conclude that the mature trees scheduled for felling cannot be retained under submitted proposed development site layout.

The applicant acknowledges and accepts the significant costs associated with purchase of off-site biodiversity units / statutory credits as would be required under the current scheme to enable a minimum 10% biodiversity net gain to be achieved and therefore comply with statutory biodiversity net gain obligations.

It is therefore advised that delivery of a minimum 10% biodiversity net gain as a result of development can be achieved through a combination of onsite delivery and off-site unit/credit purchase. It is a matter for the planning balance to determine that the applicant has had appropriate regards to the mitigation hierarchies with regards to the delivery of statutory Biodiversity Net Gain obligations.

Onsite gains are provided predominantly through provision of ‘low’ distinctiveness habitats are moderate or poor condition. Habitats to be created are not therefore ecologically complicated to create or maintain to necessary condition. Proposed onsite gains delivery a relatively low number of biodiversity habitat units. Accordingly, the proposed onsite gains would not constitute ‘significant’ gain under Biodiversity Net Gain terminology. A Habitat Management and Monitoring Plan would not be required to accompany the Biodiversity Gain Plan that must be submitted for approval by the Council prior to the commencement of development in discharge of the deemed condition. Legal agreement to secure a HMMP is therefore also not required.

However, it is recommended that the applicant is required to submit a suitably detailed Landscape and Ecological Management Plan (LEMP) for approval in writing by the Council, prior to the commencement of development. The LEMP should detail how landscaping proposals will deliver the post-development Biodiversity Net Gain requirements set out in the approved Biodiversity Gain Plan and supporting Statutory Metric documents.

Subject to the imposition of suitably worded conditions to deal with the matters raised above it is considered that the proposed development would satisfactorily address its BNG obligations and be acceptable having regard to adopted Local Plan Policy NE4.

7.10 Trees

Local Plan Policy NE3 states that the Council will not permit development which would affect adversely existing trees worthy of retention, particularly those subject to Tree Preservation Orders (TPOs) and where appropriate will ensure that trees are protected either through

condition or the making of new TPOs.

New development will be expected to make provision for tree and general planting in appropriate situations, to improve the level of tree coverage within the Borough and, therefore, improve and enhance its contribution to visual amenity, biodiversity and climate change.

Major development schemes should include comprehensive landscaping, tree planting and Management plans for agreement, including, where appropriate, the mechanisms for long-term maintenance. All landscaping and tree planting schemes should include species appropriate to the site conditions and to anticipated forecasts of climate change.

The application is accompanied by an Arboricultural Report, which sets out the proposed tree works which are sought as part of the application to enable the development proposed. These comprise the removal of 4 individual trees (two sweet chestnuts and two oaks, each covered by TPO 439V) and the removal of one group (comprising hornbeam and oak, not protected). These trees are identified as category C in the submitted arboricultural report, and as advised by the Tree Officer would not be considered to form a constraint on development. New tree planting is proposed and will be secured as part of the detailed landscaping scheme.

In addition, the canopy of group G3 is proposed to be reduced on the eastern side boundary, and the canopies of several trees along the site frontage (of which two are covered by TPO 439V) are proposed to be selectively crown lifted to allow a 5m clearance underneath for access by vehicles. The proposed forecourt car parking would be constructed using a no dig method within the root protection areas of the frontage trees. The proposed building layout results in a small encroachment into the outer root protection area of T23 (covered by TPO 439V), where roots exceeding 25mm in diameter could be present. The method statement details proposals to dig an assessment trench in this location using handheld tools under arboricultural supervision, and if necessary, an engineer designed foundation detail shall be adopted or agreement sought from the tree officer for selective pruning.

All other trees to be retained on site will be adequately protected through the implementation of a tree protection plan during construction.

7.11 Public Open Space

The Rushmoor Local Plan seeks to ensure that adequate public open space (POS) provision is made to cater for future residents in connection with new residential developments. Policy DE6 allows provision to be made on the site, or in appropriate circumstances, a contribution to be made towards upgrading POS facilities nearby.

This is a circumstance where a contribution has not been requested due to the specific nature of the future occupiers of the proposed development which is to provide specialist residential accommodation for the elderly in need of care and of limited mobility, who are not expected to require the use of public open space or place additional burdens upon it. The proposal is considered to be acceptable within the terms of Local Plan Policy DE6.

7.12 Public Sector Equality Duty

Public Sector Equality Duty (PSED) : s149 of the Equality Act 2010 requires all public authorities to “have due regard to” (a) the need to eliminate discrimination, harassment and victimisation; (b) advance equality of opportunity; and (c) foster good relations between people with protected characteristics and those without as an essential element of their decision-making, which includes the consideration and determination of Planning Applications.

'Protected characteristics' are: age, disability, gender re-assignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex and sexual orientation.

The application proposes a specialist form of housing for older persons and future residents would therefore share a protected characteristic as defined in the PSED. The proposal would meet an identified need for this type of accommodation which would weigh in favour of the development having regard to the PSED.

7.13 Other Issues

Access for People with Disabilities: By its nature in providing specialist accommodation, it is considered that there is no reason why the proposed development would be unable to provide adequate access for people with disabilities in accordance with the Building Regulations. In the circumstances it is considered that adequate facilities would be provided for people with disabilities using the proposed development.

Airport Safeguarding: Following a review of the submission by Farnborough Airport's Safeguarding Officer no objections have been raised to the proposed increase in the height of built development on the site, however two further issues have been raised – namely the potential impact of any glint and glare from the proposed rooftop solar panels given the proximity of the site to the airport runway, and the potential use of cranes during construction. Both of these matters can be controlled by suitably worded planning conditions.

Sustainability: The Design and Access Statement submitted with the application details the proposed sustainability measures that are proposed to be incorporated into the development, which includes the use of Photovoltaic Panels on the roof and electric vehicle charging points in the car parking area. Criterion b. of Policy DE1 requires new developments to "*promote designs and layouts which take account of the need to adapt to and mitigate against the effects of climate change, including the use of renewable energy*". Criterion n. then requires that "*All development proposals will demonstrate how they will incorporate sustainable construction standards and techniques.*" Local Plan Policy DE4 also requires "all new homes to meet the water efficiency standards of 110 litres/person/day to be achieved by compliance with the Building Regulations" and there is also a lower water consumption efficiency standard available under the Building Regulations where a planning condition is imposed to require it. The Design and Access Statement confirms that the development will target the BREAAAM 'excellent' standard and that the water consumption target will therefore be met. Specific planning conditions are recommended to secure water efficiency measures, the PV panels and the EV charging points.

8. Conclusions

Given the Council's current published five-year housing land supply position, it is considered that NPPF Paragraph 11 d) is applicable and accordingly, planning permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for the refusal of planning permission, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

In this instance, following an assessment of the application it is not considered that there are any policies in the NPPF that protect areas or assets of particular importance which would provide a strong reason for the refusal of planning permission. It is therefore necessary to

consider whether any adverse impacts that would arise from the granting of planning permission, would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

The proposal would provide 66 new residential care bed spaces (net gain of 50) in a purpose-built development designed to meet the requirements set by the Care Quality Commission. The proposal would bring an existing vacant site back into use, redeveloping previously developed land and enabling the continued provision of residential care in a sustainable location in the Borough. The development would make a significant contribution towards the need for specialist accommodation in the Borough, and a contribution towards the supply of general housing in the Borough, which equates to a moderate contribution of 24 dwellings. The development would also result in economic benefits in the creation of new jobs, with 23 FTE members of staff expected to be on site at any one time. These factors are considered to attract substantial positive weight in favour of granting planning permission.

The proposed development would result in the substantial demolition of a locally listed building, which would harm the significance of the non-designated heritage asset through the loss of original built fabric and this weighs against the granting of planning permission. However, the retention of the façade of the original dwelling that stood on the site, together with the installation of the Roll of Honour memorial board within the new building which will be accessible to the public, will enable continued interpretation of the site's history whilst also facilitating the redevelopment of the site to enable the continued provision of residential care on the site, at a level commensurate with modern standards.

The development would result in harm to the amenities of neighbouring properties, predominantly through actual and perceived overlooking and the potential to result in an overbearing impact, and notwithstanding the results of the applicant's Daylight and Sunlight Assessment, is likely to result in a greater degree of overshadowing to neighbouring amenity spaces although it is acknowledged that the BRE guidelines are broadly met.

The development would result in a significant increase in the amount and scale of built development on the site, and would be of a greater height and scale than any other buildings in Albert Road, but it is not considered that it would give rise to an unacceptable impact on local character having regard to the specific circumstances of this site.

With regard to biodiversity and ecology impacts, on-site impacts have been assessed with regard to protected species and found to be acceptable subject to conditions. The requirement for BNG is proposed to be through a combination of on-site improvements and off-site credits. Subject to the matters proposed to be secured in the S106, the proposal would not have an adverse effect on the Thames Basin Heaths SPA.

The proposed car parking provision does not meet the Council's adopted standards as set out in the Car and Cycle Parking Standards SPD, but has been assessed by the applicant as being sufficient to meet the forecast needs of the development and it is noted that no objections have been raised by the Highway Authority with regard to the effects of the development on highway safety.

A redevelopment of the scale proposed will inevitably result in some adverse impacts and harm, and this is particularly so in this instance given the proposed substantial demolition of a locally listed building, the amount of development proposed and the close relationship with neighbouring dwellings. However the provision of a new purpose-built residential care home, which will enable the continued use of the site for this purpose, as well as the effective contribution towards housing supply, are considered to attract substantial weight in favour of

granting planning permission, of sufficient weight to outweigh the harm identified. Accordingly, it is recommended that permission be granted.

The proposals are therefore considered to be acceptable having regard to the criteria of Adopted Rushmoor Local Plan Policies IN2 (Transport), HE1 (Heritage), HE2 (Demolition of a Heritage Asset), HE3 (Development within or adjoining a conservation area), DE1 (Design in the Built Environment), DE4 (Sustainable Water Use), DE6 (Open Space, Sport and Recreation), DE10 (Pollution), LN1 (Housing Mix), LN4 (Specialist and Supported Accommodation), NE1 (Thames Basin Heaths Special Protection Area), NE2 (Green Infrastructure including 'Green Corridors'), NE3 (Trees and Landscaping), NE4 (Biodiversity), and NE8 (Sustainable Drainage Systems).

Full Recommendations

It is recommended that, **SUBJECT** to the completion of a satisfactory s106 Legal Agreement by 30th April 2026, or any subsequent extension of time for determination of the application that may be agreed, to secure the following:-

1. Restriction on mobility of residents (to be assessed by care home operator on admission, with records of assessments available for review upon request by the LPA)
2. Mechanism to secure payment of SANG and SAMM mitigation in the event that any resident does not meet the test set out in point 1.
3. The agreed Travel Plan and associated £1,500 approval fee, £15,000 monitoring fee and £15,811.40 cash deposit / bond

the Executive Head of Property and Growth in consultation with the Chairman be authorised to **GRANT** planning permission subject to the following conditions and informatives:

However, in the event that a satisfactory s106 Agreement is not completed by 30th April 2026 and no Extension of Time has been agreed, the Executive Head of Property and Growth, in consultation with the Chairman, be authorised to refuse planning permission on the grounds that the proposal does not secure appropriate planning obligations contrary to adopted Local Plan Policies and Government Planning Policy and Practice Guidance.

NOTE: Detailed wording of conditions to follow in the amendments sheet.

1. Commencement of development within 3 years
2. Compliance with the approved plans
3. Details of external facing materials to be submitted
4. Submission of details of a landscaping scheme
5. Restriction on hours of site operation
6. Submission of Construction Environmental Management Plan
7. Placement of Roll of Honour Board in new building, with public access to be made available
8. Submission of a façade retention scheme (prior to any demolition)
9. Compliance with the submitted Arboricultural Method Statement and Tree Protection Plan
10. Details of protected species licence
11. Details of external lighting (to accord with the Preliminary Ecological Appraisal)
12. Submission of Landscape and Ecological Management Plan
13. BNG Deemed condition
14. Details of solar panels (to include requirement for glint and glare to be addressed)
15. Refuse Collection Management Plan to be submitted

16. Implementation of vehicular access and visibility splays
17. Retention of parking and turning areas at all times
18. Details of in/out access signage to be provided
19. Construction Method Statement
20. Details of surface water drainage scheme to be submitted
21. Submission of details of as built drainage scheme before occupation
22. Details of plant
23. Restriction on hours of deliveries and
24. Submission of noise insulation scheme
25. Submission of contaminated land assessment
26. Requirement to address unforeseen contamination during construction
27. Details of obscure glazing
28. Details of sub-station enclosure
29. No overnight staying of staff permitted
30. Parking retained for staff and visitors only

Informatives

- 1 INFORMATIVE - The Council has granted permission because:-
 - a. The proposals are considered acceptable in principle in land use terms and would provide an acceptable living environment. The development would have an acceptable impact on local character. The development would result in the substantial demolition of a locally listed building and would harm residential amenity. Harm has also been identified in relation to non-compliance with parking standards, but no adverse highway safety impacts are expected to arise. Overall however it is considered that the positive weight to be given to the provision of new residential care bed spaces and the effective benefit to housing supply would outweigh that harm. The development would not result in harm to protected species, and subject to the Travel Plan and related financial contributions as well as a restriction on the mobility of future occupiers, the proposals would have no significant impact upon the nature conservation interest and objectives of the Thames Basin Heaths Special Protection Area. The proposals are therefore considered to be acceptable having regard to the criteria of Policies IN2 (Transport), HE1 (Heritage), HE2 (Demolition of a Heritage Asset), HE3 (Development within or adjoining a conservation area), HE4 (Archaeology), DE1 (Design in the Built Environment), DE2 (Residential Internal Space Standards), DE3 (Residential Amenity Space Standards), DE4 (Sustainable Water Use), DE6 (Open Space, Sport and Recreation), DE10 (Pollution), LN1 (Housing Mix), LN2 (Affordable Housing), NE1 (Thames Basin Heaths Special Protection Area), NE3 (Trees and Landscaping), NE4 (Biodiversity), NE8 (Sustainable Drainage Systems).
 - b. It is therefore considered that subject to compliance with the attached conditions, and taking into account all other material planning considerations, including the provisions of the development plan, the proposal would be acceptable. This also includes a consideration of whether the decision to grant permission is compatible with the Human Rights Act 1998.
- 2 INFORMATIVE - This permission is subject to a planning obligation under Section 106 of the Town and Country Planning Act 1990 (as amended).

- 3 INFORMATIVE - Your attention is specifically drawn to the conditions marked *. These condition(s) require the submission of details, information, drawings etc. to the Local Planning Authority BEFORE a certain stage is reached in the development. Failure to meet these requirements is in contravention of the terms of the permission and the Council may take enforcement action to secure compliance. As of April 2008 submissions seeking to submit details pursuant to conditions or requests for confirmation that conditions have been complied with must be accompanied by the appropriate fee.

- 4 INFORMATIVE - The applicant should be made aware that subject to any planning permission that may be granted by the Local Planning Authority, a subsequent permission will need to be granted by HCC as Highways Authority to undertake the access works on the highway. Details of this procedure can be found via the following link: <https://www.hants.gov.uk/transport/parking/droppedkerbs>

- 5 INFORMATIVE - No materials produced as a result of site preparation, clearance, or development should be burnt on site. Please contact the Council's Environmental Health Team for advice.

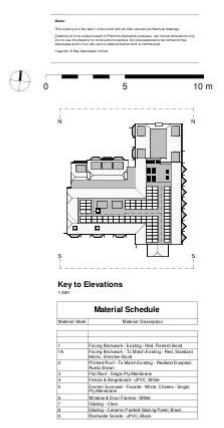
- 6 INFORMATIVE - The applicant is advised that during the construction phase of the development measures should be employed to contain and minimise dust emissions, to prevent their escape from the development site onto adjoining properties. For further information, please contact the Council's Environmental Health Team.

- 7 INFORMATIVE - Measures should be taken to prevent mud from vehicles leaving the site during construction works being deposited on the public highway throughout the construction period.

- 8 INFORMATIVE - A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

- 9 INFORMATIVE - The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

- 10 INFORMATIVE - The applicant should be made aware that subject to any planning permission that may be granted by the Local Planning Authority, a subsequent permission will need to be granted by HCC as Highways Authority to undertake the access works on the highway. Details of this procedure can be found via the following link: <https://www.hants.gov.uk/transport/parking/droppedkerbs>
- 11 INFORMATIVE - In the UK all species of bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and under Schedule 2 of the conservation (Natural Habitats & c) Regulations 2004. The grant of planning permission does not supersede the requirements of this legislation and any unauthorised works would constitute an offence. If bats or signs of bats are encountered at any point during development then all works must stop immediately and you should contact Natural England.
- 12 INFORMATIVE - Part I of the Wildlife and Countryside Act 1981 (as amended), makes it an offence to intentionally kill, injure or take any wild bird, or intentionally to damage, take or destroy its nest whilst it is being built or in use. Development activities such as vegetation or site clearance should be timed to avoid the bird nest season of March to August inclusive. If this is not possible and only small areas of dense vegetation are affected, the site should be inspected for active nests by an ecologist within 24 hours of any clearance works. If any active nests are found they should be left undisturbed with a buffer zone around them, until it can be confirmed by an ecologist that the nest is no longer in use.
- 13 12 INFORMATIVE - The applicant is requested to bring the conditions attached to this permission to the attention of all contractors working or delivering to the site, in particular any relating to the permitted hours of construction and demolition; and where practicable to have these conditions on display at the site entrance(s) for the duration of the works.
- 14 13 INFORMATIVE - The Local Planning Authority's commitment to working with the applicants in a positive and proactive way is demonstrated by its offer of pre-application discussion to all, and assistance in the validation and determination of applications through the provision of clear guidance regarding necessary supporting information or amendments both before and after submission, in line with the National Planning Policy Framework.





Proposed First Floor Plan
1:100

- Key to Colours**
- Accident
 - Horizontal Circulation
 - Resident Bedroom
 - Resident Communal Space
 - Resident Ensuite
 - Resident Living
 - Staff Use
 - Vertical Circulation
- Legend**
- Existing self-retained walls to change to 200
 - Proposed walls

0 5 10 m

Area Schedule (GIA)	
Level	Area
1st Floor	1,200.00
2nd Floor	1,200.00
3rd Floor	1,200.00
4th Floor	1,200.00
Total	4,800.00

Area Schedule (Gross Building)	
Level	Area
1st Floor	1,200.00
2nd Floor	1,200.00
3rd Floor	1,200.00
4th Floor	1,200.00
Total	4,800.00

Bedroom Schedule Summary	
Level	Area
1st Floor	1,200.00
2nd Floor	1,200.00
3rd Floor	1,200.00
4th Floor	1,200.00
Total	4,800.00



Proposed Second Floor Plan
1:100

- Key to Colours**
- Accident
 - Horizontal Circulation
 - Resident Bedroom
 - Resident Communal Space
 - Resident Ensuite
 - Resident Living
 - Staff Use
 - Vertical Circulation
- Legend**
- Existing self-retained walls to change to 200
 - Proposed walls

0 5 10 m

Area Schedule (GIA)	
Level	Area
1st Floor	1,200.00
2nd Floor	1,200.00
3rd Floor	1,200.00
4th Floor	1,200.00
Total	4,800.00

Area Schedule (Gross Building)	
Level	Area
1st Floor	1,200.00
2nd Floor	1,200.00
3rd Floor	1,200.00
4th Floor	1,200.00
Total	4,800.00

Bedroom Schedule Summary	
Level	Area
1st Floor	1,200.00
2nd Floor	1,200.00
3rd Floor	1,200.00
4th Floor	1,200.00
Total	4,800.00



