

21 NOVEMBER 2023

KEY DECISION? YES

REVIEW OF THE RUSHMOOR LOCAL PLAN 2014-2032

SUMMARY:

The Council is required to review the Rushmoor Local Plan by 21 February 2024 in line with planning legislation. A review has been undertaken using the Planning Advisory Service (PAS) toolkit which concludes that the Local Plan policies need to be updated and that a full update of the Local Plan policies is required.

RECOMMENDATIONS:

It is recommended that the Cabinet:

Agree the conclusions of the review of the Local Plan, which are that:

- i. the Local Plan policies need to be updated; and
- ii. a full update of the Local Plan policies is required.

1. INTRODUCTION

- 1.1. The purpose of this report is to present the findings of the technical review of the Rushmoor Local Plan 2014-2032 and to seek the Cabinet's agreement of the conclusions of the review.
- 1.2. This is a key decision because it will be significant in terms of its effects on communities living or working in an area comprising two or more wards within the Borough, as the Local Plan is a Borough-wide document.

2. BACKGROUND

- 2.1. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the Local Planning Regulations) sets out that a local planning authority must review a local plan every five years, starting from the date of adoption of the local plan, in accordance with section 23 of the Planning and Compulsory Purchase Act 2004 (the PCPA). The National Planning Policy Framework (NPPF) paragraph 33 clarifies the purpose of this review and sets out that policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.

- 2.2. The Rushmoor Local Plan was adopted on 21 February 2019 so the policies must be reviewed to assess whether they need updating by 21 February 2024.

3. DETAILS OF THE PROPOSAL

General

- 3.1. The process for and content of the review of local plan policies is not prescribed in law or set out in national guidance, however the Planning Advisory Service (PAS), a branch of the Local Government Association (LGA), has provided a toolkit guide local planning authorities through the process of reviewing a local plan.
- 3.2. The toolkit is split into two parts:
- Part 1 considers the plan and policies against key requirements for the content of local plans set out in the PCPA, Local Planning Regulations, the NPPF, Planning Practice Guidance (PPG), Written Ministerial Statements and the National Model Design Code (NMDC).
 - Part 2 considers the plan against the key requirements for the content and form of local plans set out in the NPPF.
- 3.3. The Rushmoor Local Plan has been reviewed using the two parts of the toolkit (see Appendices 1 & 2). The outcome of the review is two decisions:
1. Whether the plan policies need to be updated
 2. Whether a partial or full update of the plan policies is required.

Do the plan policies need to be updated?

- 3.4. Based on the review using the toolkit, officers have determined that the plan policies do need to be updated, for the following reasons.
- 3.5. There have been a number of changes to national planning policy requirements since the adoption of the Local Plan in 2019, and further changes are expected to come forward in the next 12 months following the royal ascension of the Levelling Up and Regeneration Bill.
- 3.6. Applying the Standard Method for calculating local housing need and using the latest affordability data published in 2023, the housing need figure for Rushmoor reduces by 38% from 436 homes per year to 272 homes per year. This is considered to be a significant change which requires a review of the strategy in the Local Plan. There has been an over delivery of 2-bed homes and under delivery of 1, 3 and 4 bed homes against the recommended affordable housing mix in the Strategic Housing Market Assessment (SHMA). The recommended mix has not been reviewed since the SHMA was produced in 2016. There is a political aspiration to deliver more 3 and 4 bed affordable homes.
- 3.7. The Local Plan and its policy (along with the Hart Local Plan and Surrey Heath Local Plan) are not meeting the forecast employment floorspace need for the Functional Economic Area (FEA) for the plan period of between

210,644 and 229,029 sqm. There has also been a significant change in the national economic conditions and the lasting effects of the Covid-19 pandemic which are likely to have changed this need and also the type of site requirements due to shifts in the commercial market. There have also been changes to the Use Class Order and continual changes to permitted development rights for commercial and retail uses.

- 3.8. Prices specifically for construction material and in general have been rising since the start of the Covid-19 pandemic and this is likely to make development overall less viable. High interest rates for mortgages are also having impacts on the ability to sell new-build properties, particularly to first-time buyers, which may also impact on cash-flow and overall viability of developments. A number of developments have come forward since the adoption of the Local Plan either no or less than policy requirement affordable housing has been agreed due to the proposed development not being viable.
- 3.9. Additionally, there have been changes to the environmental context which have implications for the current Local Plan approach. The most significant of which is the statutory requirement to deliver 10% Biodiversity Net Gain. The requirement for mitigation in the form of Suitable Alternative Natural Greenspace (SANG) also presents a barrier to the delivery of homes in Rushmoor and a long-term strategy for its delivery is required.

Is a partial or full update of the plan policies is required?

- 3.10. Based on the review using the toolkit, officers have determined that a full update of the planning policies is required, for the following reasons.
- 3.11. The amendments to policies and changes to the national policy context is expected to result in a material change to the housing requirement, which will in turn have implications for other plan requirements and the overall evidence base.
- 3.12. The required update to policies is expected to affect one or more strategic policies, notably the housing, employment and environmental policies, which will have consequential impacts on the rest of the plan.
- 3.13. As a result of the expected implications for other plan requirements and the overall evidence base from the material change to the housing requirement, and the expectation that one or more strategic policies will need to be updated, officers do not consider it possible to undertake a partial update of the plan or update policies in isolation. A full update will therefore be required.
- 3.14. The consequence of this decision is that a new Local Plan will need to be prepared for Rushmoor. The Levelling Up and Regeneration Act 2023 paves the way for reforms to the plan-making process and the form and content of local plans. The Government has recently consulted on some of the detail of these reforms, but the full implications of the reforms will not be known until the secondary legislation is published, which is proposed for next year.

The reforms are likely to impact on when we can begin preparing a new Local Plan and the timescales that will need to be met. A report further detailing proposals for the new Local Plan is proposed to be brought to the Cabinet in due course, subject to the progress of further guidance and secondary legislation.

Alternative Options

- 3.15. One alternative option is to determine that the Local Plan policies do not need to be updated, or that only a partial update of the Local Plan policies is required. This option is rejected because the evidence and assessment set out in Appendices 1 & 2 does not support this approach.
- 3.16. The second alternative option is not to make a determination on whether the Local Plan policies need to be updated. This option is rejected because it would be in conflict with Rushmoor's requirements under section 23 of the PCPA. The Council has a reputation as a competent local planning authority, has prepared two development plans since the introduction of the PCPA and is one of only 35% of local planning authorities which have adopted a local plan in the last five years. This option would put that reputation at risk.

Consultation

- 3.17. Reviewing Local Plan policies is deemed to be an activity under paragraph (3)(d) of section 33A of the PCPA – a 'Duty to Cooperate' activity – because it prepares the way for the preparation of development plan documents. The following Duty to Cooperate bodies were written to on 4th September 2023:
 - Local planning authorities: Basingstoke and Deane Borough Council, Bracknell Forest Council, Elmbridge Borough Council, Guildford Borough Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Runnymede Borough Council, Spelthorne Borough Council, Surrey Heath Borough Council, Waverley Borough Council, Woking Borough Council, Wokingham Borough Council
 - Enterprise M3 Local Enterprise Partnership
 - Environment Agency
 - Hampshire County Council
 - Hampshire and Isle of Wight Local Nature Partnership
 - National Highways
 - Historic England
 - Natural England
 - Frimley Integrated Care Board
 - Surrey County Council

The bodies were given the opportunity to make comments on any strategic issues which may be relevant to the review of the policies in the Rushmoor Local Plan. The responses received are summarised in Appendix 3.

- 3.18. The completed PAS templates (Appendices 1 & 2) and conclusions of the review were discussed at the meeting of the Strategic Housing and Local Plans Group (SHLPG) on 19th October 2023 and endorsed by the Group.

4. IMPLICATIONS (of proposed course of action)

Risks

- 4.1. The Council is required by law to review its Local Plan no later than five years after adoption to decide whether an update to the policies is necessary. Although the conclusion of the review is that a full update of the Local Plan policies is required, the Rushmoor Local Plan is considered to provide an up-to-date development plan for the purpose of decision-making whilst an updated Local Plan is brought forward. It is therefore considered that there are no direct risks of the recommendation to accept the conclusions of the review.

Legal Implications

- 4.2. There are not considered to be any legal implications arising from the recommendation to accept the conclusions of the review, as the Rushmoor Local Plan will remain the development plan for Rushmoor until such time that a new Local Plan is prepared and adopted. Further details of the proposals for a new Local Plan and any legal implications of this will be brought to the Cabinet at a future date.

Financial and Resource Implications

- 4.3. This decision means that a new Local Plan will need to be prepared for Rushmoor. Further details of the proposals for a new Local Plan and the financial and resource implications of this will be brought to the Cabinet at a future date.

Equalities Impact Implications

- 4.4. There are no equalities impact implications arising from the recommendation to accept the conclusions of the review. Equalities impact assessment work will accompany the preparation of a new Local Plan.

Other

- 4.5. There are not considered to be any other implications.

5. CONCLUSIONS

- 5.1. The conclusion of the review is that a full update of the Local Plan policies is required due to changes in national policy and the economic and environmental context within which the plan was prepared. The update to policies is expected to affect one or more strategic policy, notably the housing, employment and environmental policies, which will have

consequential impacts on the rest of the plan and therefore requires a full rather than partial review of the plan.

- 5.2. The outcome of the review has been supported by SHLPG, including Cllr Lyon the Portfolio Holder for Planning and Economy. The recommendation is made to Cabinet to ensure that the Council can meet its legal obligation to review the Local Plan within five years of its adoption.

APPENDICES

- Appendix 1 – PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment
- Appendix 2 – PAS Local Plan Route Mapper Toolkit Part 2: Local Plan Form and Content Checklist
- Appendix 3 – Responses from Duty to Cooperate Bodies on Local Plan Review

BACKGROUND DOCUMENTS:

There are no background documents.

CONTACT DETAILS:

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PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date [NPPF](#), [PPG](#), Written Ministerial Statements and the [National Model Design Code](#). To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#). Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.

Appendix 1 – PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position, any local design guides or codes and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

Appendix 1 – PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>The NPPF has been updated on a number of occasions since the adoption of the Local Plan. The Local Plan has been assessed against the current NPPF requirements in Part 2 of the toolkit. In assessing the Local Plan against the NPPF, a coding system of green for wholly accords with, orange for partially accords with and red for does not accord with the NPPF has been used. Based on Part 2 of the toolkit, the Local Plan either wholly or partially accords with the majority of the relevant key requirements in the NPPF. The areas where the Local Plan does not accord with the NPPF are largely new requirements introduced into the NPPF since the adoption of the Local Plan, such as the requirement to outline which policies are ‘strategic’, the requirement for strategic policies to look forward over a minimum 15-year period from adoptions and the requirement to use the standard method as a starting point for a local housing need assessment. The key areas where the Local Plan does not wholly accord with the relevant key requirements in national policy are: plan content, housing, healthy & safe communities, design, climate change & flooding and the natural environment.</p>
A2.	<p>There has not been a significant change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Local Plan has an objectively assessed housing need (OAN) of 436 homes a year for a total of 7,848 homes required over the plan period from 2014 to 2032. It seeks to deliver 8,884 homes over the plan period. Applying the standard method and using the latest affordability data published in 2023, the housing need figure for Rushmoor is 272 homes a year. This is a 38% decrease on the Local Plan OAN which is considered to be a significant change in the local housing need.</p> <p>There are no formal agreements to meet unmet need from neighbouring authority areas.</p> <p>The whole of Rushmoor is within 5km of the Thames Basin Heaths Special Protection Area (TBHSPA) which means that all development which increases the number of persons must mitigate potential impacts through SANG provision. Therefore, delivering the current housing requirement is dependent on SANG availability.</p>

Appendix 1 – PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement								
	example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.										
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The latest five-year housing land supply position statement was published in March 2022 and covers the period 2021-26 with a base date of 1 April 2021. The position statement sets out that Rushmoor has an oversupply of identifiable and deliverable housing supply of approximately 6.9 years. The Inspector appointed to undertake the examination of the local plan set out in her report that the Liverpool method for delivering the undersupply was appropriate and justified. The position statement has therefore used the Liverpool method to calculate the housing supply position.</p>								
A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Agree	<table border="1" data-bbox="1146 898 2004 967"> <thead> <tr> <th data-bbox="1146 898 1359 930">2018</th> <th data-bbox="1359 898 1574 930">2019</th> <th data-bbox="1574 898 1789 930">2020</th> <th data-bbox="1789 898 2004 930">2021</th> </tr> </thead> <tbody> <tr> <td data-bbox="1146 930 1359 967">123%</td> <td data-bbox="1359 930 1574 967">141%</td> <td data-bbox="1574 930 1789 967">199%</td> <td data-bbox="1789 930 2004 967">179%</td> </tr> </tbody> </table> <p>Rushmoor’s housing delivery test measurement has always been in excess of 100% and has been increasing since 2018. There was a slight drop in 2021 likely due to disruption to completions resulting from the initial Covid-19 lockdown in 2020.</p>	2018	2019	2020	2021	123%	141%	199%	179%
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A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Disagree	<p>(i) Affordable housing</p> <table border="1" data-bbox="1146 272 2119 408"> <thead> <tr> <th>2014-15</th> <th>2015-16</th> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> <th>2019-20</th> <th>2020-21</th> <th>2021-22</th> <th>2022-23</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>No data</td> <td>-72</td> <td>103 (28%)</td> <td>238 (53%)</td> <td>146 (48%)</td> <td>69 (9%)</td> <td>81 (36%)</td> <td>200 (47%)</td> <td>108 (29%)</td> <td>873 (26%)</td> </tr> </tbody> </table> <p>Affordable housing has consistently delivered against the policy requirement, which is that on sites of 11 or more dwellings, 20% affordable housing must be delivered within town centres and 30% delivered outside town centres. There was a net loss of affordable housing in 2015-16 due to significant demolitions as part of a redevelopment scheme in North Town. There was also a significant under-delivery of net new affordable homes in 2019-20 because of demolitions associated with the North Town redevelopment scheme.</p> <p>Whilst the overall delivery of affordable housing is consistent with the policy requirement, there have been a number of applications granted in the plan period which provide reduced or no affordable housing as it was determined that the development would not be viable.</p> <table border="1" data-bbox="1146 834 2002 1305"> <thead> <tr> <th>Year</th> <th>1-bed</th> <th>2-bed</th> <th>3-bed+</th> </tr> </thead> <tbody> <tr> <td><i>LP recommended mix based on SHMA</i></td> <td>30%</td> <td>30-40%</td> <td>30% (10% as 4-bed)</td> </tr> <tr> <td>2014-15</td> <td>No data</td> <td>No data</td> <td>No data</td> </tr> <tr> <td>2015-16</td> <td>22%</td> <td>78%</td> <td>0%</td> </tr> <tr> <td>2016-17</td> <td>15%</td> <td>55%</td> <td>31% (7% 4-bed)</td> </tr> <tr> <td>2017-18</td> <td>24%</td> <td>58%</td> <td>18% (2% 4-bed)</td> </tr> <tr> <td>2018-19</td> <td>50%</td> <td>44%</td> <td>3%</td> </tr> <tr> <td>2019-20</td> <td>16%</td> <td>45%</td> <td>40% (8% 4-bed)</td> </tr> <tr> <td>2020-21</td> <td>16%</td> <td>48%</td> <td>36% (11% 4-bed)</td> </tr> <tr> <td>2021-22</td> <td>14%</td> <td>53%</td> <td>34% (4% 4-bed)</td> </tr> <tr> <td>2022-23</td> <td>10%</td> <td>63%</td> <td>34% (3% 4-bed)</td> </tr> <tr> <td>Average 2014-23</td> <td>21%</td> <td>56%</td> <td>25% (4% 4-bed)</td> </tr> </tbody> </table>	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL	No data	-72	103 (28%)	238 (53%)	146 (48%)	69 (9%)	81 (36%)	200 (47%)	108 (29%)	873 (26%)	Year	1-bed	2-bed	3-bed+	<i>LP recommended mix based on SHMA</i>	30%	30-40%	30% (10% as 4-bed)	2014-15	No data	No data	No data	2015-16	22%	78%	0%	2016-17	15%	55%	31% (7% 4-bed)	2017-18	24%	58%	18% (2% 4-bed)	2018-19	50%	44%	3%	2019-20	16%	45%	40% (8% 4-bed)	2020-21	16%	48%	36% (11% 4-bed)	2021-22	14%	53%	34% (4% 4-bed)	2022-23	10%	63%	34% (3% 4-bed)	Average 2014-23	21%	56%	25% (4% 4-bed)
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Appendix 1 – PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

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			<p>The overall mix of affordable housing delivered does not differ significantly from the local plan recommended mix as it recommends slightly more 2-bed homes than 1-, 3- and 4-bed homes. However, there has been an over delivery of 2-bed homes and under delivery of 1-, 3- and 4-bed homes. The recommended mix has not been reviewed since the SHMA was produced in 2016. There is a political aspiration to deliver more 3- and 4-bed affordable homes.</p> <p>The local plan policy does not refer to First Homes as these were introduced after the adoption of the local plan. The Council has a First Homes Interim Policy Statement, but this needs to be incorporated into a local plan policy so that it forms parts of the development plan.</p> <p>(ii) Commercial</p> <table border="1" data-bbox="1144 644 2002 1086"> <thead> <tr> <th>Year</th> <th>New employment floorspace (sq m)</th> <th>Employment floorspace lost (sq m)</th> <th>Net gain or loss of employment floorspace (sq m)</th> </tr> </thead> <tbody> <tr> <td>2014-15</td> <td>7,706</td> <td>4,757</td> <td>2,949</td> </tr> <tr> <td>2015-16</td> <td>19,370</td> <td>4,997</td> <td>14,373</td> </tr> <tr> <td>2016-17</td> <td>5,858</td> <td>255</td> <td>5,603</td> </tr> <tr> <td>2017-18</td> <td>15,082</td> <td>7,884</td> <td>7,198</td> </tr> <tr> <td>2018-19</td> <td>1,074</td> <td>1,095</td> <td>-21</td> </tr> <tr> <td>2019-20</td> <td>600</td> <td>22,337</td> <td>-21,737</td> </tr> <tr> <td>2020-21</td> <td>20,191</td> <td>13,474</td> <td>6,717</td> </tr> <tr> <td>2021-22</td> <td>17,395</td> <td>14,572</td> <td>2,823</td> </tr> <tr> <td>2022-23</td> <td>0</td> <td>138</td> <td>-138</td> </tr> <tr> <td>Total</td> <td>87,276</td> <td>69,509</td> <td>17,767</td> </tr> </tbody> </table> <p>The Hart, Rushmoor and Surrey Heath Joint Employment Land Review (November 2016) identifies a gross floorspace requirement for the FEA for 2014-2032 of between 210,644 and 229,029 sq m. Up to March 2021 (latest available data for Hart and Surrey Heath), there was a net gain of 15,082 sq m of employment floorspace in Rushmoor, a net loss of 35,688 sq m in Hart and a net gain of 14,681 sq m in Surrey Heath. The local plan and its policy (along with the Hart Local Plan and Surrey Heath Local Plan) are therefore not meeting the forecast employment floorspace need for the FEA for the plan period.</p>	Year	New employment floorspace (sq m)	Employment floorspace lost (sq m)	Net gain or loss of employment floorspace (sq m)	2014-15	7,706	4,757	2,949	2015-16	19,370	4,997	14,373	2016-17	5,858	255	5,603	2017-18	15,082	7,884	7,198	2018-19	1,074	1,095	-21	2019-20	600	22,337	-21,737	2020-21	20,191	13,474	6,717	2021-22	17,395	14,572	2,823	2022-23	0	138	-138	Total	87,276	69,509	17,767
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			<p>However, as set out below there have been changes in economic conditions which mean that the forecast employment floorspace is out of date and likely to have changed.</p>
<p>A6.</p>	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	<p>Disagree</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There has been a significant change in the national economic conditions since the adoption of the local plan. Firstly, there was the unforeseen Covid-19 pandemic and associated lockdowns which appear to have permanently changed shopping and working habits. High streets and town centres are still struggling to recover as people have continued to shop more online and many businesses have moved to a hybrid working model meaning that either less office space is required, or a different type of office space is required.</p> <p>Changes to the Use Class Order and the introduction of Use Class E has also had an impact on retail and employment uses as there is now more flexibility to change between these uses without the need for planning permission.</p> <p>As of 2023, the country has fallen into a ‘cost of living crisis’ due to a combination of factors including the lasting impact of the Covid-19 pandemic, the war in Ukraine and politics in the UK. It is not clear at this stage how long the economic downturn will last and when the turning point will be. The impacts of these for the local plan will not be completely understood until up-to-date evidence is prepared, such as a HEDNA.</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement								
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>BCIS All-in Tender Price Index:</p> <table border="1" data-bbox="1146 831 1924 898"> <thead> <tr> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>334</td> <td>333</td> <td>332</td> <td>355</td> </tr> </tbody> </table> <p>Prices for construction materials have been rising since the start of the pandemic in March 2020. There is some evidence that price increases seemed to have plateaued in the summer of 2022, however due to high demand worldwide, prices are expected to remain elevated for at least a couple of years. This is likely to make development overall less viable and make challenges against policy requirements on viability grounds more likely. Small- and medium-sized housebuilders will be the most affected.</p> <p>Evidence from planning decisions suggests that most developments are viable and generally deliverable, however some brownfield sites are unable to deliver affordable housing.</p>	2020	2021	2022	2023	334	333	332	355
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A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>On 31st March 2023:</p> <table border="1" data-bbox="1144 336 2002 1273"> <thead> <tr> <th>Site</th> <th>Planning permission granted</th> <th>Development commenced</th> <th>Development complete</th> </tr> </thead> <tbody> <tr> <td>Wellesley (Aldershot Urban Extension)</td> <td>Yes</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Westgate (Aldershot)</td> <td>Yes</td> <td>Yes</td> <td>Yes</td> </tr> <tr> <td>The Galleries (Aldershot)</td> <td>Yes</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Union Street East (Aldershot)</td> <td>Yes</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Hippodrome House (Aldershot)</td> <td>Yes, subject to s106</td> <td>No</td> <td>No</td> </tr> <tr> <td>Westgate Phase II (Aldershot)</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Aldershot Railway Station and Surrounds</td> <td>Yes, subject to S106</td> <td>No</td> <td>No</td> </tr> <tr> <td>Farnborough Civic Quarter</td> <td>Outline permission granted, subject to s106</td> <td>No</td> <td>No</td> </tr> <tr> <td>The Crescent (Farnborough)</td> <td>Yes</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Meudon House/ 117 Pinehurst (Farnborough)</td> <td>Yes</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Land at 68-70 Hawley Lane (Farnborough)</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Blandford House and Malta Barracks (Aldershot)</td> <td>Yes</td> <td>No</td> <td>No</td> </tr> </tbody> </table> <p>The majority of the site allocations have been granted planning permission and are therefore on track to deliver within the plan period. There are two sites where there has</p>	Site	Planning permission granted	Development commenced	Development complete	Wellesley (Aldershot Urban Extension)	Yes	Yes	No	Westgate (Aldershot)	Yes	Yes	Yes	The Galleries (Aldershot)	Yes	Yes	No	Union Street East (Aldershot)	Yes	Yes	No	Hippodrome House (Aldershot)	Yes, subject to s106	No	No	Westgate Phase II (Aldershot)	No	No	No	Aldershot Railway Station and Surrounds	Yes, subject to S106	No	No	Farnborough Civic Quarter	Outline permission granted, subject to s106	No	No	The Crescent (Farnborough)	Yes	Yes	No	Meudon House/ 117 Pinehurst (Farnborough)	Yes	Yes	No	Land at 68-70 Hawley Lane (Farnborough)	No	No	No	Blandford House and Malta Barracks (Aldershot)	Yes	No	No
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			<p>been no progress: Westgate Phase II and 68-70 Hawley Lane. Westgate Phase II is not anticipated to come forward until later in the plan period due to the current uses on the site. If 68-70 Hawley Lane does not come forward, it is not considered to put the spatial strategy at risk as it is only anticipated to deliver a relatively small number of dwellings (10 dwellings). Although Hippodrome House is allocated for 70 dwellings, the Council's Development Management Committee resolved in March 2023 to grant planning permission for 30 dwellings, subject to the completion of a satisfactory s106 legal agreement. The number of dwellings is less than that allocated, but this is not considered to put the spatial strategy at risk.</p> <p>The key site for delivering the spatial strategy is Wellesley (Aldershot Urban Extension) which will deliver up to 3850 homes. The local plan sets out that the site will deliver 898 homes by 2020, 2178 by 2025 and 3850 by 2031. By 31 March 2020, 804 homes had been completed on the site and it was therefore on track to complete the 898 homes by the end of 2020 and by 31 March 2021 972 homes had been completed. By 31 March 2023 1,282 homes had been completed but reserved matters approval has only been granted for 1,743 homes. The latest phasing plan (adjusted by RBC) predicts that 1772 homes will be completed by March 2025 and that the remaining 2568 homes will not be complete until March 2032. Delivery of this will depend on the timing of the remaining reserved matters applications. Progress is continuing on the site, and it is not currently considered to put the spatial strategy at risk.</p>

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A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The most significant change in relation to the environment is the statutory requirement to deliver 10% Biodiversity Net Gain (BNG), now expected to be introduced in January 2024. Rushmoor will require policies which set out how this will be dealt with locally and, if considered appropriate, to require a higher percentage of BNG on developments in Rushmoor than is required nationally. The current local plan encourages a net gain in biodiversity, but this predates the introduction of a mandatory requirement for BNG.</p> <p>The whole of Rushmoor is within 5km of the Thames Basin Heaths Special Protection Area (TBHSPA) which means that all development which increases the number of persons must mitigate potential impacts through SANG provision. There are a few strategic SANGs in Rushmoor with limited remaining capacity and the majority of development is brownfield redevelopment on urban sites and so there is no capacity for on-site SANG provision. The provision of SANG is a potential barrier to the delivery of homes in Rushmoor. Following the adoption of the Local Plan, the Council undertook a joint authority project to explore the potential for alternative mitigation approaches for the TBHSPA. This led to amendments to the Natural England guidance on SANG. The identification of new SANG and policy relating to the TBHSPA will need to take this amended guidance into account.</p> <p>Surface water flooding is a major concern and restricts the areas available for housing development. There is also a need to improve the quality of the rivers and watercourses across the Borough as the River Blackwater, Cove Brook and Basingstoke Canal all failed the assessment of chemical status in 2019, whereas all of them had been rated ‘good’ in 2016.</p> <p>There are no AQMAs in the Borough and the only known area of low air quality is along the A331 at the edge of the Borough. Rushmoor Borough Council, along with Surrey Heath Borough Council, was directed by the Secretary of State to develop a plan to achieve air quality improvements along the A331, and to bring about compliance with legal limits in the shortest possible time. After the adoption of the Local Plan in February 2019, a speed restriction of 50mph along a 1.8 km section of the A331, between Coleford Bridge and Frimley was implemented in June 2019. The 2019 Clean Air Strategy sets out the case for action, with goals to reduce exposure to harmful pollutants. The Road to Zero sets out the approach to reduce exhaust emissions from road transport through a</p>

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			<p>number of mechanisms. Rushmoor Borough Council declared a Climate Emergency in 2019, and our Climate Change Action Plan was approved in November 2020. This provides a set of actions aimed at making the council carbon neutral and Aldershot and Farnborough more sustainable by 2030.</p> <p>There are a wide mix of heritage assets across the Borough and very few of them are designated as heritage assets at risk. A programme of Conservation Area review has taken place since the adoption of the Local Plan. This has led to boundary changes and is expected to increase the total number of Conservation Areas.</p> <p>No concerns have been raised by statutory consultees in relation to planning applications or planning appeals which may impact on the plan.</p>
<p>A10.</p>	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p>	<p>Disagree</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There are a number of new sites which have been promoted or identified through the SHELAA (as of September 2023):</p> <p><u>Aldershot:</u></p> <p>610 - Upper Union Terrace and 182-192 Victoria Road (Deliverable) 616 - Parsons Barracks Car Park, Ordnance Road (Deliverable) 620 - 2-4 Mount Pleasant Road (Deliverable) 621 - Land adjacent to 1 Pickford Street (Developable) 622 - 84-86 and Land to the Rear of 88-90 Victoria Road (Developable)</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>		<p>626 – 235-237 High Street (Developable) 627 - Redan Road Depot, Redan Road (Developable) 633 - 103-105 High Street (Developable) 635 – Interpower House, Windsor Way (Developable) 639 – 3-5 Pickford Street (Developable)</p> <p><u>Farnborough:</u></p> <p>612 - Land adjacent to Green Hedges, Hawley Road (Deliverable) 624 - Randell House, Fernhill Road (Deliverable) 629 - 68 Alexandra Road (Deliverable) 630 - 125-127 Alexandra Road (Deliverable) 631 - 2 Alexandra Road (Deliverable) 637 – 30 Camp Road (Developable) 640 – Land at Orchard Rise 127 and La Fosse House, 129 Ship Lane and Farnborough Hill School, 312 Farnborough Road (Developable)</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Rushmoor Infrastructure Plan was prepared in January 2018 and sets out the infrastructure which was considered necessary at the time to deliver the Local Plan. Whilst there are a range of infrastructure projects identified to cope with the increase of residents as a result of the delivery of the housing set out in the spatial strategy, none of these are critical to enable the delivery of the Local Plan. In July 2013, the Council granted a hybrid planning permission for the Wellesley development. A Section 106 obligation relating to the provision of appropriate infrastructure was finalised soon after and this infrastructure has, or will be provided as the development progresses.</p>

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A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Mostly agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>From discussions with Development Management officers, the majority of the policies in the plan are achievable and effective for the purpose of decision-making. However, there are issues with individual policies which have been raised:</p> <ul style="list-style-type: none"> • Policy DE13 ‘development within residential curtilages’ / Policy DE1 ‘Design in the Built Environment’ – the policy reference to unacceptable tandem development is worded to only be a policy conflict if within residential back gardens. • Policy DE1 – the policy makes no reference to overbearing impacts. • Policy PC8 – Skills and Employment Training – there are challenges with the enforceability of this policy. • Policy DE11 – there are challenges with the enforceability of this policy. • Farnborough Airport – since the development of the policy, a section 73 application has been submitted and the Public Safety Zone has been changed. • Policy IN2 – there are some issues with parking provision, although these may be resolved by a review of the Car and Cycle Parking SPD.

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A13.	<p>There are no recent or forthcoming changes to another authority’s development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Surrey Heath – progressing a new local plan covering period 2019-2038 and consulted on a Reg 18 draft in 2022. Rushmoor has a close working relationship with Surrey Heath and a Statement of Common Ground was signed between the two authorities in early 2022. Surrey Heath is heavily constrained and is unable to identify sufficient capacity to meet its housing needs under standard method. The Authority is also facing challenges meeting Gypsy and Traveller and Travelling Showpeople needs.</p> <p>Hart – Local Plan 2014-2032 adopted in 2020. Hart are not currently progressing a new Local Plan and will need to complete a review by April 2024. Rushmoor has a close working relationship with Hart and there are not anticipated to be any impacts at this stage, but this will be kept under review.</p> <p>Waverley – Strategic policies and allocations in Local Plan Part 1 (LPP1) (adopted 2018) and detailed development management policies and allocations for some settlements in Local Plan Part 2 (adopted 2023). Following review of LPP1, Waverley agreed that an update was necessary and should be comprehensive, however the Council has not yet set out in detail the scope, approach and timetable for the new local plan. It is too early to understand potential impacts, but this will be kept under review.</p> <p>Guildford – Part 1 of Local Plan (Strategy and Sites) adopted in 2019. This meets OAN but was prepared under NPPF 2012 and will need to be reviewed by April 2024. Part 2 of Local Plan (Development Management Policies) currently at examination. No impacts arising from either plan at this stage, but this will be kept under review.</p> <p>In relation to adjoining authorities, it should be noted that there are national proposals to make changes relating to matters that may need to be considered when assessing whether a plan can meet all of the housing need which has been identified locally. The proposals would make clear that Green Belt does not need to be reviewed or altered when making plans. Surrey Heath, Waverley and Guildford have areas of Green Belt so these changes may affect whether they meet their housing need in the future.</p> <p>Hampshire Minerals and Waste Local Plan – Hampshire CC and its partner authorities are in the process of preparing a new Minerals and Waste Local Plan for the county. There are no anticipated impacts for Rushmoor arising from this draft local plan.</p>

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			<p>Hampshire Local Transport Plan – a new draft Local Transport Plan (LTP4) has been produced by Hampshire CC which covers the period up until 2050. This has a focus on the climate emergency declared across the county and on the impact of Covid-19. The local plan currently does not go far enough in terms of climate change, sustainable transport and active travel to support the delivery of LTP4.</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>In summer 2019 the Council declared a climate emergency in Rushmoor and pledged to make the Council carbon neutral and Aldershot and Farnborough greener and more sustainable. The Climate Change Strategy 2020-2030 and Climate Change Action Plan 2020-2030 were subsequently adopted. The Local Plan does not have a specific policy to address climate change.</p> <p>‘Your future, your place’ – A vision for Aldershot and Farnborough 2030 Six areas of the vision: vibrant and distinctive town centres, housing for every stage of life, strong communities who are proud of our area, healthy and green lifestyles, a growing local economy which is kind to the environment and opportunities for everyone including quality education and a skilled local workforce. The key areas for the local plan are the town centres, housing, heritage and public/community spaces, access to parks and green spaces and the local economy.</p> <p>Strategic Economic Framework and Action Plan 2022-2025 The Strategic Economic Framework also reflects current government policy (as outlined in the Levelling Up White Paper) and is intended to inform the development of a UK Shared Prosperity Fund Investment Plan, helping to leverage funding into the borough. The vision in the SEF will be supported through four Strategic Pillars which represent the main aspects of economic growth in Rushmoor. The most relevant for the Local plan is SP4: Place – Our Town Centres, Sites, Homes and Workspaces and includes identified key outcomes relating to town centre regeneration, right range and mix of employment land, workspaces and business environment, strategic and local connectivity and delivering of a range of housing tenures.</p> <p>Rushmoor Housing and Homelessness Prevention Strategy 2023-2027 The new Housing and Homelessness Strategy has three core themes:</p> <ol style="list-style-type: none"> 1. Increase the supply of good quality homes, for all residents and prospective residents, for every stage of life 2. Support residents to access affordable, well managed and maintained housing in the private and social sectors 3. Work proactively to improve the condition and energy efficiency of housing in the borough

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>The Strategy includes the following objective under theme 1 which is relevant to the Local Plan: Objective 2 - Implement plans and policies which encourage the delivery of a diverse range of housing types and tenures, and which supports the local housing market.</p> <p>Green Infrastructure Strategy The vision is: <i>“By 2032 the Council and its partners will have worked with the local community to achieve a high quality, connected and multi-functional green and blue infrastructure network that extends across the Borough, which is sustainable and provides benefits for people, place and nature.”</i></p>

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	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p>If no go to question A16.</p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p><u>Decision:</u> Update plan policies</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>There have been a number of changes to national planning policy requirements since the adoption of the Local Plan in 2019, and further changes are expected to come forward in the next 12 months following the royal ascension of the Levelling Up and Regeneration Bill.</p> <p>Applying the Standard Method for calculating local housing need and using the latest affordability data published in 2023, the housing need figure for Rushmoor reduces by 38% from 436 homes per year to 272 homes per year. This is considered to be a significant change which requires a review of</p>		

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	<p>the strategy in the Local Plan. There has been an over delivery of 2-bed homes and under delivery of 1-, 3- and 4-bed homes against the recommended affordable housing mix in the SHMA. The recommended mix has not been reviewed since the SHMA was produced in 2016. There is a political aspiration to deliver more 3- and 4-bed affordable homes.</p> <p>The Local Plan and its policy (along with the Hart Local Plan and Surrey Heath Local Plan) are not meeting the forecast employment floorspace need for the FEA for the plan period of between 210,644 and 229,029 sqm. There has also been a significant change in the national economic conditions and the lasting effects of the Covid-19 pandemic which are likely to have changed this need. There have also been changes to the Use Class Order and continual changes to permitted development rights for commercial and retail uses.</p> <p>Prices specifically for construction material and in general have been rising since the start of the Covid-19 pandemic and this is likely to make development overall less viable. High interest rates for mortgages are also having impacts on the ability to sell new-build properties, particularly to first-time buyers, which may also impact on cash-flow and overall viability of developments. A number of developments have come forward during the Local Plan period either with no or less than policy requirement affordable housing has been agreed due to the proposed development not being viable.</p> <p>Additionally, there have been changes to the environmental context which have implications for the current Local Plan approach. The most significant of which is the statutory requirement to deliver 10% Biodiversity Net Gain. The requirement for mitigation in the form of SANG also presents a barrier to the delivery of homes in Rushmoor and a long-term strategy for its delivery is required.</p> <p>Other actions that may be required in addition to or in place of an update of plan policies A number of the evidence documents produced to support the Local Plan are now out of date and will need to be replaced/updated.</p>		
	<p>B. POLICY UPDATE FACTORS</p>	<p>YES/NO (please indicate below)</p>	<p>Provide details explaining your answer in the context of your plan / local authority area</p>
<p>B1</p>	<p>Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.</p>	<p>Yes</p>	<p>Applying the Standard Method for calculating local housing need and using the latest affordability data published in 2023, the housing need figure for Rushmoor reduces by 38% from 436 homes per year to 272 homes per year. This is considered to be a material change which will likely have implications for other plan requirements and the overall evidence base.</p>
<p>B2</p>	<p>The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.</p>	<p>No</p>	<p>The spatial of distribution of growth set out in the Local Plan is still fit for purpose and unlikely to change as a result of any policies update, as there are limited options for alternative growth distribution. Wellesley (Aldershot Urban</p>

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			Extension) will continue to be the focus of development alongside regeneration projects within Aldershot and Farnborough Town Centres due to constraints which restrict development opportunities outside of these locations.
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	Yes	The policies update is likely to affect one or more strategic policies, notably the housing, employment and environmental policies, which will have consequential impacts on the rest of the plan.
	You have answered yes to one or more questions above.		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above		If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
B4	<p>Decision: Full Update of Plan Policies</p> <p>Reasons for scope of review:</p> <p>The amendments to policies and changes to the national policy context is expected to result in a material change to the housing requirement, which will in turn have implications for other plan requirements and the overall evidence base.</p> <p>The update to policies is expected to affect one or more strategic policy, notably the housing, employment and environmental policies, which will have consequential impacts on the rest of the plan.</p>		

Date of assessment:	September 2023
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Assessed by:	Alice Knowles/Anna Lucas/Jamie Adcock
Checked by:	Tim Mills
Comments:	

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies. You should also be mindful of Written Ministerial Statements which form material considerations in plan-making.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

- Local Plan Review:** The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:
- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.
 - Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

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Scoping your policies update: The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

Assessing your draft policies update: The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	The Local Plan includes any relevant material set out in government policy statements up to the point of the examination of the plan. Additional policy statements will have been made in the four years since the adoption of the Plan.
2.	Contribute to the achievement of sustainable development and the UN Sustainable Development Goals.	NPPF Para 7, 8, 9, 16	The Local Plan contributes to the achievement of sustainable development but does not contribute to the achievement of all of the UN Sustainable Development Goals.
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	Policy SS1 applies the presumption in favour of sustainable development in the 2012 NPPF and any successor policy.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	The Local Plan contains a Vision 2032 of how the Borough might look in 2032 when the Local Plan policies have been implemented. This addresses a prosperous and healthy local economy, provision of 7850 new homes to make a significant contribution to meeting local housing need, town centre investment and regeneration, provision of a sustainable historic and natural environment and reduced deprivation. The framework for delivering this vision is set out in the spatial strategy and the strategic policies in the Plan.
5.	Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication	NPPF Para 16	The Local Plan is aspirational and deliverable and contains clear and unambiguous policies as tested at the examination stage. There is a digital version of the adopted policies map but otherwise the Plan is not particularly accessible through digital tools other than the download of a PDF of the plan. There is some duplication of national policy within the Local Plan.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>Plan Content</i>		
6.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places.	NPPF Para 17, 20	The Local Plan includes strategic policies to address the priorities for development and use of land in the Borough. Policy DE1 sets out the high-level strategy for design in the built environment but lacks detail in relation to the pattern, scale and design quality of places.
7.	Outline which policies are ‘strategic’ policies	NPPF Para 21	The Local Plan does not currently identify which policies are ‘strategic’ policies and which are ‘non-strategic’.
8.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> . Where larger scale developments are proposed that form part of the strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years).	NPPF Para 22, having regard to the transitional provisions at NPPF para 221	The Local Plan was adopted in 2019 and covers the period up to 2032 – it therefore only looks ahead over a 13-year period from adoption.
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	The Local Plan contains a key diagram and land use designations and allocations on a policies map.
10.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	The Local Plan policies provide a clear strategy for bringing forward land to deliver up to 8,884 homes over the plan period against an OAN of 7,848.
11.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	The Local Plan includes non-strategic policies for specific areas, but these are not labelled in the Plan as ‘non-strategic’.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
12.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 58	The Local Plan is supported by a viability assessment which concludes that the policies and any required contributions are viable and will not undermine the delivery of the Plan.
13.	Local Plans and development strategies are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.	NPPF Para 35	The Local Plan was examined under the 2012 NPPF and found, subject to main modifications, to be positively prepared, justified, effective and consistent with national policy.
<i>Housing</i>			
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point. Any housing needs which cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for within the plan.	NPPF Para 61	The Local Plan was prepared prior to the introduction of the standard method and therefore is informed by a Strategic Housing Market Assessment which established an objectively assessed need (OAN).
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 62	Local Plan Policies LN1 and LN2 refer to the size, type and tenure of housing set out in the SHMA (2016) or subsequent update and differentiate between market and affordable housing but do not identify need for other groups. The SHMA is now out-of-date, and no subsequent update has been undertaken.
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 63	Local Plan Policy LN2 sets out that predominantly subsidised rented affordable housing, in order to best meet local needs as set out in the SHMA (2016) and any subsequent update, with a smaller proportion of intermediate affordable housing, to help create mixed communities should be provided. The SHMA is now out-of-date, and no subsequent update has been undertaken.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
17.	Expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. A minimum of 25% of all affordable homes should be First Homes, subject to the transitional requirements set out in the Planning Practice Guidance.	NPPF Para 65	The Local Plan requires 30% of dwellings to be provided as affordable homes and 20% of dwellings to be provided as affordable homes within the town centres. The priority is for subsidised rented affordable housing to best meet local needs. There is no requirement for First Homes as this was introduced after the adoption of the Local Plan.
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 66	N/A
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 68	The Local Plan does identify some specific sites which are deliverable and developable, however some sites allocated in the plan are not specified as deliverable or developable and it is not indicated when these are likely to come forward.
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 69	The Local Plan allocated 250 dwellings on sites no larger than 1ha – this is 2.8% of the housing requirement identified in the Local Plan.
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 72	The Local Plan does not address this issue. Given the high house prices within the Borough, it is unlikely that the need for such homes is already being met.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
22.	Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	NPPF Para 73	The Local Plan refers to masterplans in relation to the Wellesley (Aldershot Urban Extension) site and the Farnborough Civic Quarter site. There is also an agreed design code for the Wellesley site which has been agreed through the DM process. The Local Plan could make better use of design guides and codes for other large scale developments.
23.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 74	The Local Plan includes a trajectory setting out the expected rate of housing delivery over the plan period.
24.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 78	N/A
25.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 79	N/A
26.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 80	N/A
<i>Economy</i>			
27.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 81	Policy PC1 (Economic Growth and Investment) supports the growth and retention of existing business and inward investment into the Borough by protecting strategic and locally important employment sites (Policy PC2 and PC3) and contributing to the improvement of the skills and education of residents (Policy PC8). The Policy also supports

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			opportunities to develop the key employment sectors in the Borough. However, it does not refer to economic growth and business needs more generally (e.g., in relation to sites which are not strategic or locally important employment sites or economic sectors beyond those mentioned).
28.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 82	The Local Plan includes a clear economic strategy and vision which is supported by a suite of policies and was informed by the Enterprise M3 LEP Strategic Economic Plan (SEP). Since the adoption of the Local Plan, the LEP has published a new SEP, and the Council has prepared a Strategic Economic Framework. A Local Industrial Strategy for the Enterprise M3 LEP area has not yet been published.
29.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 82	The Local Plan allocates Strategic Employment Sites and Locally Important Employment Sites. The strategic sites are identified to contribute towards meeting the future economic growth needs of the Borough, the Functional Economic Area of Hart, Rushmoor and Surrey Heath, and the wider Enterprise M3 LEP area over the Plan period. The locally important sites are identified as being crucial to the economy of Rushmoor and the Functional Economic Area. .
30.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 82	The LEP SEP (published in 2014) identified Aldershot as a 'Step-Up Town', an area of latent economic potential which currently experiences barriers to growth that impact upon the performance of the Enterprise M3 area. The Local Plan supports the LEP SEP (published in 2014), which identified growth packages for Step-up Towns. The Local Plan provides a land use planning framework which supports the aims and objectives of these growth packages and seeks

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			to address other potential barriers to investment (including physical and social infrastructure).
31.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 82	Policy PC2 (Strategic Employment Sites) and PC3 (Locally Important Employment Sites) supports the redevelopment and regeneration of these sites to provide employment floorspace that meets the needs of the market. There are also a number of site-specific policies for particularly significant employment sites which build upon the overarching policies (Policy PC4: Farnborough Business Park; Policy PC5: Cody Technology Park; Policy PC6: East Aldershot Industrial Cluster; Policy PC7: Hawley Lane South). For example, Policy PC6 supports the redevelopment of existing employment units which have reached the end of their functional economic life, the refurbishment of existing stock and the subdivision of larger units to provide multiple units. There is no specific reference to new and flexible work practices in the Local Plan. The Policies were adopted prior to the changes in the use classes, which revoked B1 uses and incorporated some of these uses under the new Use Class E.
32.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 83	The Local Plan recognises and address the specific locational requirements of different sectors. Policy PC1 supports opportunities to develop the following key employment sectors: <ul style="list-style-type: none"> • Specialist/advanced manufacturing, • Manufacturing and distribution, • Business services. Policy PC5 (Cody Technology Park) supports the expansion of Cody Technology Park, as specialist research and development offer, supported by excellent telecommunications infrastructure and high-capacity power supplies, in a secure, controlled environment.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			There is no specific reference to storage and distribution operations within the Local Plan.
33.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 84	Rushmoor is predominantly urban, with only small pockets of countryside and no identifiable rural economy. There is therefore no specific policy in the Local Plan which covers the sustainable growth and expansion of business in rural areas. However, Policy NE5 (Countryside) supports development within the countryside, outside the defined urban area, subject to proposals meeting certain criteria.
34.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 84	N/A
35.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 84	Rushmoor is predominantly urban, with only small pockets of countryside and no identifiable rural economy. Whilst there is no policy in the Local Plan covering rural tourism and leisure development within the countryside, Policy NE5 (Countryside) supports development within the countryside, outside the defined urban area, subject to proposals meeting certain criteria. However, since the adoption of the Local Plan a leisure development has come forward at the Former Lafarge Site (Hollybush Lakes) in the countryside.
36.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 84	The Local Plan defines 17 Local Neighbourhood Facilities across Aldershot and Farnborough which are protected under Policy LN6. These provide local retail facilities to meet residents' daily needs and are accessible for those with mobility issues.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
37.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 85	N/A
38.	<i>Town centres</i>		
39.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 86	The Local Plan identifies two town centres: Aldershot and Farnborough and one district centre: North Camp.
40.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 86	The extent of the town and district centres and the primary and secondary frontages within these are also mapped. There are policies to set out the range of uses which will be acceptable within these different town/district centre zones.
41.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 86	Policy SP2 sets out that part of the strategy for Farnborough Town Centre is to retain and enhance Farnborough market.
42.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 86	The Local Plan allocates a number of sites in Aldershot town centre to be delivered over the plan period. It also allocates the Civic Quarter site which is mostly within Farnborough town centre and will be delivered over the plan period.
43.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 86	The Local Plan allocated the Civic Quarter development in Farnborough which is largely edge-of-centre and will contain some town centre uses.
44.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 86	The Local Plan allocates a number of sites for regeneration within town centres either for a mixed use or residential development to support the regeneration and vitality of the town centres.
45.	<i>Healthy and safe communities</i>		

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
46.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 92	There are a number of policies within the Local Plan which seek to achieve healthy, inclusive and safe places and enable and support healthy lifestyles. Policy DE8 supports healthy lifestyles by safeguarding existing indoor and built sport and recreation facilities and supporting development for new and improved facilities. Similarly, Policy DE6 protects open space and outdoor sport and recreation facilities. Policy LN1 requires 15% of market dwellings to be built to accessible and adaptable standards (Building Regulations M4(2)). Policy LN5 seeks to achieve neighbourhood improvement in deprived areas by ensuring that development addresses these issues. The Local Plan is silent on creating healthy, inclusive safe and accessible public realm.
47.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 93	The Local Plan defines 17 Local Neighbourhood Facilities across Aldershot and Farnborough which are protected under Policy LN6. These provide local retail facilities to meet residents' daily needs and are accessible for those with mobility issues. New community facilities and shared spaces are to be provided as part of some of the larger developments in the Borough such as Wellesley and Farnborough Civic Quarter. Policy IN1 sets out the criteria for provision of new community facilities as part of developments.
48.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 93	The Local Plan takes account of the following evidence relating to health: Hampshire County Council (2015) ' Joint Strategic Needs Assessment 2015: Rushmoor District', available at www.hants.gov.uk/socialcareandhealth/publichealth Public Health England (2018) 'Rushmoor District Health Profile 2018';

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>'Hampshire County Health Profile 2018', available at http://fingertips.phe.org.uk/profile/health-profiles</p> <p>There are a number of health and social strategies prepared by Hampshire County Council which have been adopted in the last few years since the Local Plan was prepared, and therefore the Local Plan does not take these into account.</p>
49.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 93	The Local Plan defines 17 Local Neighbourhood Facilities across Aldershot and Farnborough which are protected under Policy LN6. These provide local retail facilities to meet residents' daily needs and are accessible for those with mobility issues.
50.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 93	The Local Plan defines 17 Local Neighbourhood Facilities across Aldershot and Farnborough which are protected under Policy LN6. These provide local retail facilities to meet residents' daily needs and are accessible for those with mobility issues.
51.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 93	This is undertaken as part of the site assessment and site allocation process.
52.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 94	<p>Policy LN5 (Neighbourhood Deprivation Strategy) states that the Council will take a partnership approach will be taken towards neighbourhood improvement in deprived areas in the Borough and consideration of development proposals in these areas will need to take this into account.</p> <p>The Local Plan does not include explicit reference to estate regeneration, the focus instead is on regeneration of the two town centres. The redevelopment of North Town Estate in Aldershot,</p>

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			formerly one of the Borough's most deprived areas, was already underway prior to the adoption of the Local Plan. This is a joint project between the registered housing provider (VIVID, formerly First Wessex Housing Association) and the Council.
53.	Plan positively to meet school place requirements and to encourage development which will widen choice in education.	NPPF Para 95	Two new primary schools, pre-school facilities and secondary school places in existing schools are being provided as part of the Wellesley development. The Council was proactive in engagement with Hampshire County Council regarding the need for additional school places associated with other development proposed in the Plan. The Local Plan does not refer to development which will widen choice in education, however education is a County matter.
54.	Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure.	NPPF Para 96	This was done as part of the preparation of the Local Plan.
55.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 97	There are minor references to public safety, but this is not fully addressed through the Local Plan.
56.	Provide open space, sports and recreational facilities which meets the needs of the local area. Consider how they can deliver wider benefits for nature and support efforts to address climate change.	NPPF Para 98	Policy DE6 provides for the retention of areas of open space uses for recreation or sport or having visual amenity. It also sets out that new residential will be permitted where it makes on-site provision for open space in accordance with the Council's standards (or a financial contribution is provided where appropriate).
57.	Protect and enhance public rights of way and access.	NPPF Para 100	Policy NE2 (Green Infrastructure) seeks to protect and enhance the existing Green Infrastructure network, which includes public rights of way and open space with existing access. This policy is supported by the Green Infrastructure Strategy, adopted in 2022. However, the

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			Local Plan does not explicitly protect and enhance public rights of way and access.
58.	<i>Transport</i>		
59.	Should actively manage patterns of growth in support of objectives in Para 104. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 105	The three largest allocations in the Local Plan are Wellesley, Farnborough Civic Quarter and The Galleries. Wellesley is such a large development that the everyday needs of the new community will be met within the site and therefore can be made sustainable. Both Farnborough Civic Quarter and The Galleries are located in Farnborough/Aldershot town centre where the everyday needs of the community can be met by walking, and they are both well served by buses and trains.
60.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 106	The local plan supports a mix of uses, particularly within the town centres to reduce journeys required to access services and other facilities. Where appropriate and compatible, a mix of uses are also supported elsewhere, for example on employment sites. Larger allocated sites in the Local Plan such as Wellesley and the Farnborough Civic Quarter contain a range of uses so that residents everyday needs can be met without needing to travel outside of the site.
61.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 106	There are no such sites or routes within Rushmoor.
62.	Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 106	The LCWIP for Rushmoor was recently adopted (2023) and therefore the Local Plan does not draw on this.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
63.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 106	There is no evidence of a need for large-scale transport facilities in Rushmoor.
64.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 106	Farnborough Airport is located within the Borough and there are a number of policies to address it in the Local Plan.
65.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 109	There is no evidence of a need for overnight lorry parking facilities in Rushmoor.
66.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users, the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 110	A number of these areas were considered in allocating land for development through the Local Plan process, however these did not reflect the National Design Guide and National Model Design Code as these have been published more recently.
67.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 111	Local Plan Policy IN2 sets out that development will be permitted where it does not have a severe impact on the operation of, safety of, or accessibility to the local or strategic road networks.
68.	<i>Communications</i>		

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
69.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 114	Local Plan Policy IN3 sets out that new development will be expected to provide for appropriate telecommunications provision, including for high-speed broadband. It does not specify that this must be full fibre broadband. The Borough generally has good coverage of mobile data on one or more networks but there are some areas which suffer from poor broadband speeds. The Local Plan does not set out how high-quality digital infrastructure is expected to be delivered and upgraded over time.
70.	<i>Making effective use of land</i>		
71.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 119	There is only one reference to making effective use of land which is in the site allocation for Farnborough Civic Quarter. The Local Plan does not promote an effective use of land as part of the overall strategy.
72.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.	NPPF Para 119	The Local Plan sets out a clear strategy for accommodating the OAN and whilst the strategy does not specifically refer to making as much use as possible of previously developed or 'brownfield' land, the majority of the site allocations are on previously developed ('brownfield') land and some are on long-derelict sites.
73.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 120	A number of the sites allocated in the Local Plan are for a mix of uses. Policy NE4 – Biodiversity requires proportionate measures to contribute to a net gain in biodiversity but does not seek to take opportunities to achieve wider net environmental gains. Policy NE2 (Green Infrastructure) includes requirements relation to the provision of enhanced green infrastructure, which will assist in achieving wider net environmental gains.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
74.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 120	Paragraph 12.13 recognises the importance of green infrastructure in the many functions it can perform, including providing sustainable transport links, mitigating and adapting to the effects of climate change, and improving physical and mental health.
75.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 120	The Local Plan gives substantial weight to using suitable brownfield land within settlements as a number of site allocations within the Plan involve the redevelopment of brownfield sites. Paragraph 9.100 recognises that whilst Rushmoor does not have a history of heavy industry, there may still be contamination due to the diversity of land use over the years. It emphasises the importance that sites are investigated and, where necessary, remediated. This is implemented through Policy DE10.
76.	Promote and support the development of under-utilised land and buildings.	NPPF Para 120	The Local Plan contains allocations which take the opportunity to make use of under-utilised sites such as 68-70 Hawley Lane.
77.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 120	The Local Plan does not support opportunities to use the airspace above existing residential and commercial premises for new homes.
78.	Reflect changes in the demand for land.	NPPF Para 122	The Local Plan does reflect changes in the demand for land, such as the allocation of the Wellesley site as MOD land which was no longer required for that purpose, and the allocation of sites for regeneration within Aldershot and Farnborough town centres.
79.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 124	There is only one reference to making effective use of land which is in the site allocation for Farnborough Civic Quarter. The Local Plan does not promote an effective use of land as part of the overall strategy.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
80.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards. Area-based character assessments, design guides, design codes and masterplans are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.	NPPF Para 125	There is not currently an existing or anticipated shortage of identified housing needs and therefore was not necessary for the Local Plan to include the use of minimum density standards. There are currently no area-based character assessments or design codes (prepared by Rushmoor) but masterplans have been developed for larger sites (Wellesley and Farnborough Civic Quarter).
81.	<i>Design</i>		
82.	Set out a clear design vision and provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.	NPPF Para 127, 128 & 129	There are no design codes or guides associated with the current Local Plan.
83.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 130	Policy DE1 (Design in the Built Environment) covers some of the requirements set out in Para 130. Further detailed is required in the design policies to ensure that all of these requirements are met by developments.
84.	Ensure new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that	NPPF Para 131	Policy NE2 (Green Infrastructure) includes requirements relation to the protection and provision of enhanced green infrastructure, which

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.		could include trees. Policy NE3 (Trees and Landscaping) seeks to retain trees worthy of retention and includes the expectation that new development includes the provision for new trees. It also refers to the need for management plans on major development sites, which include mechanisms for the long term maintenance. There is no specific requirement in the Local Plan for new streets to be tree-lined..
85.	<i>Green Belt</i>		
86.	Ensure proposals for new Green Belts demonstrate why development management policies would not be adequate, any major changes in circumstances to warrant the creation of a new Green Belt, the consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 139	N/A
87.	Establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 140	N/A
88.	Give first consideration to land which has been previously-developed and/or is well-served by public transport, including increasing density within town and cities centres. Set out the ways in which the impact of removing land from the Green Belt can be offset through compensatory	NPPF Para 141 & 142	N/A

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	improvements to the environmental quality and accessibility of remaining Green Belt land.		
89.	Where Green Belt boundaries are being defined, they should be clearly outlined and be consistent with the plan’s strategy for meeting identified requirements for sustainable development.	NPPF Para 143	N/A
90.	<i>Climate change, flooding and coastal change</i>		
91.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 153	Policy DE1 promotes 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. It also requires proposals to demonstrate how they will incorporate sustainable construction standards and techniques. BREEAM ‘very good’ standard overall and ‘excellent’ standard for water consumption are required for major commercial developments over 1,000 sq m in floorspace.
92.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 153	The current Local Plan policies focus on adaptation and mitigation in relation to climate change but there is little mention of the resilience of communities and infrastructure.
93.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 155	This is not addressed in the Local Plan.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
94.	Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	NPPF Para 160 & 161	Policies NE6, NE7 and NE9 cover the management of fluvial flood risk and surface water flooding. For fluvial flood risk a sequential test is applied to ensure that development is first located in Flood Zone 1.
95.	Steer new development to those areas with the lowest risk of flooding from any source. If this is not possible, the exception test may have to be applied, informed by the potential vulnerability of the site and of the development proposed. Where this is the case, sites needs to demonstrate that the development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its lifetime without increasing flood risk elsewhere (and where possible will reduce flood risk overall).	NPPF Para 162, 163, 164 and NPPF Annex 3	Policy NE6 seeks to manage fluvial flood risk and steer development towards the lowest risk of flooding. Policy NE7 and NE9 seeks to manage areas of surface water flood risk. The policies do not contain a requirement to demonstrate that the development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its lifetime where proposals are on areas of higher risk of flooding.
96.	Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 171	N/A
97.	<i>Natural environment</i>		
98.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 174	As a predominantly urban Borough, much of this is not relevant/applicable to Rushmoor. However, Policy NE4 seeks to protect, maintain and enhance the Borough's biodiversity and geological resources and Policy NE5 (Countryside) seeks to preserve the character and appearance of the countryside
99.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the	NPPF Para 175	Policy NE4 and the supporting text distinguishes between the hierarchy of international, national and locally designated sites. The importance of maintaining and enhancing networks of habitat and green infrastructure is covered in Policy NE4 and throughout the Plan. There is no policy reference to natural capital.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	enhancement of natural capital at a catchment or landscape scale across local authority boundaries.		
100.	Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty. The scale and extent of development within these designated areas should be limited. Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	NPPF Para 176	N/A
101.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 178	N/A
102.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 179	Some of the habitats and ecological networks are mapped, but further work is needed to ensure that they are all mapped. Policy NE4 seeks to promote the conservation, restoration and enhancement of priority habitats. The Local Plan does not require measurable net gains for biodiversity.
103.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 183 & 185	The Local Plan contains Policy DE10 on Pollution.
104.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and	NPPF Para 186	Paragraph 9.92 sets out that: 'Proposals for development that risks non-compliance of EU limit values or the Council having to designate an area as an AQMA will be refused', but this is not carried through to the Policy DE10.

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	Clean Air Zones, and the cumulative impacts from individual sites in local areas.		
105.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 187	There is no policy reference to ensuring that new development can be integrated effectively with existing businesses and community facilities.
106.	<i>Historic Environment</i>		
107.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 190	Policies HE1, HE2, HE3 set out a positive strategy for the conservation and enjoyment of the historic environment.
108.	<i>Minerals</i>		
109.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 210	N/A
110.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 210	N/A
111.	Safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas.	NPPF Para 210	N/A
112.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 210	N/A
113.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the	NPPF Para 210	N/A

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	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.		
114.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 210	N/A
115.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 210	N/A
116.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 210	N/A

Appendix 3 - Responses from Duty to Cooperate Bodies on Local Plan Review

DtC body	Comments
Basingstoke and Deane Borough Council (BDBC)	<ul style="list-style-type: none"> • BDBC is currently at the early stages of review its Local Plan, with Regulation 18 timetabled from January 2024 • Proposing to meet its housing need in full over Local Plan period to 2040 so no outstanding housing need issues • Currently proposed to use a stepped trajectory to provision to allow for development of strategic sites and deal with infrastructure provision • Due to location of proposed development, do not consider there are any specific duty to cooperate issues that would directly impact on Rushmoor
Bracknell Forest Council	<ul style="list-style-type: none"> • The emerging Bracknell Forest Local Plan (BFLP) covers the period 2020 – 2037 and is currently at Examination with Proposed Main Modifications having been published for consultation for 6 weeks on 31st October • The BFLP identifies sufficient sites to meet our housing needs. • Bracknell do have unmet needs for gypsies and travellers over the longer term, following the Inspectors' recommendation to remove a strategic site which was going to include the provision of pitches. The Inspectors appear to have accepted that these needs can be met through the development management process, and, there is a policy in the BFLP for this purpose. • Bracknell also have unmet need for industrial and warehousing floorspace. Given the current stock of floorspace, uncertainty about future demand and support given to the retention and intensification of existing employment areas by our policies, the Inspector appears to have accepted this position. • Request that they kept informed about evidence relating to housing (including gypsies and travellers) and economic needs together with any associated policy issues. • Request that we discuss any matters relating to the Thames Basin Heaths Special Protection Area, including air pollution and issues relating to the Blackwater Valley River and its surrounds. • Initial view that there is unlikely to be any strategic implications relating to transport, but unable to confirm this prior to studying outputs from future transport models.
Elmbridge Borough Council (EBC)	<ul style="list-style-type: none"> • As part of preparation of the Elmbridge Local Plan 2037, EBC twice contacted all authorities in the South East informing them that the Council was unable to meet its housing requirements in full and sought to discuss if there were opportunities to accommodate some/all of EBC's unmet need • RBC's response was that considering the recent adoption of the Rushmoor Local Plan and constrained nature of the Borough, we are unable to meet any of EBC's unmet need and this position is unlikely to change in the future • EBC ask that RBC keep in mind the previous request of meeting some or all of EBC's unmet housing need in reviewing the local plan policies and to contact them if the position changes
Enterprise M3 LEP	<i>No response received.</i>

Environment Agency	<ul style="list-style-type: none"> • The Environment Agency would expect your local plan to cover these range of topics including, but not limited to: <ul style="list-style-type: none"> ○ Net Gain - an approach to managing the environment that leaves it in a measurably better state ○ Flood risk management - ensuring development is steered towards areas of lowest flood risk, underpinned by a robust and up-to-date strategic flood risk assessment that follows our guidance. Securing contributions to flood risk management infrastructure to unlock development potential ○ Climate change - ensuring policies, site allocations and design of development takes climate change into account ○ Strategic water planning - quality, quantity and efficiency to support new development and safeguard the environment ○ Drainage and infrastructure - ensuring new development has adequate infrastructure to manage waste water and surface water disposal ○ Green and blue infrastructure - for flood risk management, water quality management and biodiversity ○ Contaminated land - bringing land back into beneficial use ○ Water Framework Directive objectives - no deterioration and water body improvements ○ Biodiversity - safeguarding protected species and habitats, highlighting opportunities for habitat creation and ○ Waste management - advising on waste management strategies and providing advice that spans the planning and permitting interface. • Advise that the Council focuses on preparing an evidence base (i.e. SFRA level 1 and 2 and the Water Cycle Study) which are useful in helping plan for sustainable growth in Rushmoor as well as inform the local plan. The Environment Agency offer to assist in the preparation of this evidence and provide links to relevant guidance.
Frimley Integrated Care System	<ul style="list-style-type: none"> • NHS Frimley are keen to ensure the impact of population growth on local healthcare provision is taken into consideration more formally • The impact comes in many forms but could include: increase in care and nursing home requirements and therefore staff, ensuring size of GP practices is suitable to register new patients, ensuring condition of GP practices is suitable, requirement to increase the size of community teams, and increase in required dental provision
Guildford Borough Council (GBC)	<ul style="list-style-type: none"> • Share a number of cross-boundary issues • Most notable is meeting housing need and associated infrastructure to support this – within different HMA but respective HMAs share strong linkages • GBC have up to date plan which meets OAN but was prepared under NPPF 2012 and will need to be reviewed by April 2024 • Number of sites are delayed and GBC does not have excess supply than can help contribute to neighbouring authority's unmet need

	<ul style="list-style-type: none"> • Until GBC begins new round of plan-making, it is not clear the extent to which it will be able to accommodate increased standard method figure
Hampshire County Council (HCC)	<ul style="list-style-type: none"> • As the local education authority, HCC request that the impact of development on education infrastructure is considered • Greater level of detail is required to understand how the necessary education infrastructure will be provided to support planned growth within Wellesley and across the rest of the borough in the local plan period and beyond • As the local highway authority, HCC recently shared a long list of transport problems and issues that will form part of the delivery plan for the Local Transport Plan 4 (LTP4) – there is nothing significant in terms of large highways schemes, but HCC is happy to revisit this should need arise as a result of new local plan work and future planned development • HCC take the opportunity to flag up the reference in section 11 of the local plan to the EM3 LEP Strategic Economic Plan and that RBC may wish to review this section in light of the changing economic landscape and Local Enterprise Partnership disaggregation
Hampshire and Isle of Wight Local Nature Partnership	<i>No response received.</i>
Hart District Council (HDC)	<ul style="list-style-type: none"> • HDC Local Plan 2014-2032 was adopted in April 2020 • HDC are not currently progressing a new local plan • Under the current system, HDC need to complete a review by April 2025 • Please see Annual Monitoring Report for background information on plan-making timetable and other matters
Historic England (HE)	<ul style="list-style-type: none"> • Rushmoor Local Plan was examined against the 2012 NPPF and although most significant changes have been made outside of the chapter on historic environment, many of these changes have heritage implications • Local Plan would more clearly articulate its positive strategy for the historic environment if it were to include a strategic heritage policy • Rushmoor may wish to consider whether its to design guidance is appropriate in light of changes to national policy and guidance • Rushmoor has declared a climate emergency and one area not covered by the current local plan is the energy efficiency of buildings including retrofit • The local plan could do more to acknowledge the overlap between the natural environment and historic environment – currently the plan risks divorcing heritage assets from environmental assets • Highlight the importance of up-to-date evidence and role of local plan process in assessing potential heritage impacts should the quantum, nature and scale of housing and business needs change
National Highways	RBC officers met with officers from National Highways and the feedback was as follows:

	<ul style="list-style-type: none"> • National Highways will be concerned with ensuring new allocations are deliverable and achievable • This will be a joint effort with HCC as there are likely to be considerably more direct impacts on the local road network with secondary impacts on the SRN • Suggestion that statements of common ground are used throughout the local plan process • Will need to consider in-combination effects as traffic from Surrey Heath, Hart and Berkshire filters into M3 junctions 4 and 4a
Natural England	<ul style="list-style-type: none"> • A strategic approach for networks of biodiversity should support a similar approach for green infrastructure • Plans should set out the approach to delivering net gains for biodiversity and requirements to monitor biodiversity net gain • Should consider the requirements of the NPPF (paras 72, 102, 118 and 170) and seek opportunities for wider environmental gain where possible • A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outline in NPPF para 171 • Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change
Royal Borough of Windsor and Maidenhead (RBWM)	<ul style="list-style-type: none"> • RBWM adopted a local plan in February 2022 and therefore has sufficient allocated land to meet its OAN for housing and employment in full • Key strategic, cross-boundary issue needing continued cooperation is Thames Basin Heaths SPA and there is an established mechanism through the JSPB to support cooperation between all 11 authorities affected
Runnymede Borough Council	<ul style="list-style-type: none"> • Consider the two key areas for cooperation are housing and the Thames Basin Heaths Special Protection Area (SPA) which were agreed as part of Runnymede's Duty to Cooperate scoping exercise in 2022 • In the early stages of preparing for a review of the Runnymede 2030 Local Plan but do not have detail in relation to changes to future housing needs yet • Will continue to cooperate with Rushmoor as/when this information becomes available
Spelthorne Borough Council	<i>No response received.</i>
Surrey County Council	<ul style="list-style-type: none"> • Changes to the NPPF and associated guidance on flooding which need to be considered • As previously stated in responses, developer contributions will be required to fund necessary additional infrastructure to mitigate significant cross-border impacts of new development, particularly in regards to education and transport • Likely that there will be a requirement for additional school places during the plan period – there is heightened demand in many Surrey areas bordering Rushmoor

	<ul style="list-style-type: none"> • Significant number of secondary aged pupils in Hampshire attend Surrey secondary schools (as many as 50% at some schools) • Concerned that the development proposed in the Rushmoor Local Plan could create increased cross-boundary pressure on Surrey schools • Farnborough Airport has the potential to impact on Surrey residents and with the forthcoming application to expand operations, it is important that any review of the Local Plan should maintain a clear policy framework against which to assess proposals for change or development at Farnborough Airport
Surrey Heath Borough Council (SHBC)	<ul style="list-style-type: none"> • SHBC is progressing a new local plan covering period 2019-2038 and consulted on a Reg 18 draft in 2022 • SH is heavily constrained and is unable to identify sufficient capacity to meet its housing needs under standard method – some unmet need included in Hart Local Plan but in the long term there will continue to be challenges regarding meeting housing needs • Also facing challenges meeting Gypsy and Traveller and Travelling Showpeople needs • Spatial strategy in the emerging local plan seeks to focus new homes in the west of the borough, particularly Camberley Town Centre – no significant cross boundary issues arising from this have been identified or raised • Currently updating future employment needs and capacity evidence • SANG and BNG are other relevant cross-boundary issues
Waverley Borough Council (WaBC)	<ul style="list-style-type: none"> • Meeting held on 25th September 2023 • Strategic policies and allocations in Local Plan Part 1 (LPP1) (adopted 2018) and detailed development management policies and allocations for some settlements in Local Plan Part 2 (adopted 2023) • Following review of LPP1, WaBC agreed that an update was necessary and should be comprehensive, however the Council has not yet set out in detail the scope, approach and timetable for the new local plan • Strategic issues provisionally identified as requiring cross boundary cooperation: housing need and supply including traveller accommodation, employment/economic development, infrastructure including transport, green infrastructure including sites for BNG, mitigation for SPAs, site allocations • Not currently in a position to confirm whether any, or how much, development will need to be met outside WaBC in neighbouring authorities and it is considered that WaBC will not be able to accommodate development needs from neighbouring areas in new Local Plan
Woking Borough Council (WoBC)	<ul style="list-style-type: none"> • If Policy SP4 is to be updated, WoBC would like to ensure that any proposed changes would not allow for the airports operations to prejudice development in Woking and would ensure the amenity in relation to noise pollution is protected • Currently no changes to WoBC housing or Traveller pitch needs and the Site Allocations DPD meets the need in full • WoBC is highly constrained and would be unable to meet any unmet need from surround authorities

	<ul style="list-style-type: none"> • Following matters are of interest to WoBC: SANG capacity, impact of increased development on the rail and road networks, Basingstoke Canal
<p>Wokingham Borough Council (WhBC)</p>	<ul style="list-style-type: none"> • WhBC intend to consult on Proposed Submission Plan in November 2023 • Seeking to accommodate scale of housing need consistent with the NPPF and do not consider proposed development allocation are likely to raise infrastructure implications for Rushmoor • Latest evidence on employment need and supply shows there is insufficient opportunity to meet all need – WhBC will be approaching neighbouring authorities to seek opportunities to accommodate unmet need in their area • Note existing and continuing arrangements for Thames Basin Heath SPA and emerging evidence suggests there is opportunity to mitigate impact from housing throughout the plan period • Do not foresee any cross boundary impacts relating to climate change