

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

Case Officer	David Stevens
Application No.	25/00537/OUTPP
Date Valid	10th October 2025
Expiry date of consultations	22nd December 2025
Proposal	Outline planning application for phased development involving demolition of existing buildings and the erection of new flexible use employment floorspace (Use Classes E(g)(i)-(iii)/B2/B8 (including data centres) and associated works. All matters reserved except access
Address	Land at Cody Technology Park and Ball Hill Ively Road Farnborough
Ward	St Mark's
Applicant	Phoenix DevCo S.a R.l
Agent	NWS Planning
Recommendation	Grant subject to s106 Legal Agreement

Introduction

The application relates to outline proposals for the expansion and re-generation of Cody Technology Park (CTP) with provision of up to 143,000 sqm of new flexible employment floorspace within Use Classes E(g)(i-iii), B2 and B8. This would involve the phased re-development of existing underused land and buildings within part of CTP, including land at Ball Hill, to the north-west of Farnborough Airport. The application site contains a range of buildings and structures of varying quality, the majority of which are under-utilised and in need of investment. Areas of the site at Ball Hill, are currently relatively undeveloped; and the wider CTP campus is also in need of substantial investment and enhancement to bring it up to modern standard and to ensure that it is capable of retaining existing as well as attracting new businesses. The proposed development seeks to secure the continued growth of CTP in order to maintain its position as one of the UK's leading aerospace and defence employment hubs.

The Application Site : The application site is of a complex irregular shape and measures approximately 33.86 ha, comprising land at Cody Technology Park (CTP South) and Ball Hill that is located within, but on the west margin of, Rushmoor BC's area. It is part of an established employment area in a relatively isolated position approximately 1.9 km south-west of Farnborough Town Centre and similarly separated from Fleet Town Centre.

Unless otherwise stated, all plans incorporated into the report are orientated with NORTH facing upwards.

To the north of the application site, the remainder of Cody Technology Park (CTP North) is to the north of Victor Way (and Old Ively Road) and is land situated within Hart District Council's area, containing further commercial floorspace, including a number of data centres.



Aerial View of the application site in relation to the Borough boundary with Hart DC's area : view looking east towards Farnborough Town Centre in the distance.

The application site is bound to the north-west by the Cody Sports & Social Club sports facilities (situated within Hart DC's area); and to the west and south by Eelmoor Marsh Site of Special Scientific Interest (SSSI) (and also a component part of the Thames Basin Heaths Special Protection Area [SPA]) that is within Rushmoor's area. Farnborough Airport is located to the south-east, with a complex of hangar buildings west of the control-tower abutting the Ball Hill section of the application site. Cove Brook arises in Eelmoor Marsh and flows north-east close to the boundary between the application site and the hangar complex portion of Farnborough Airport.

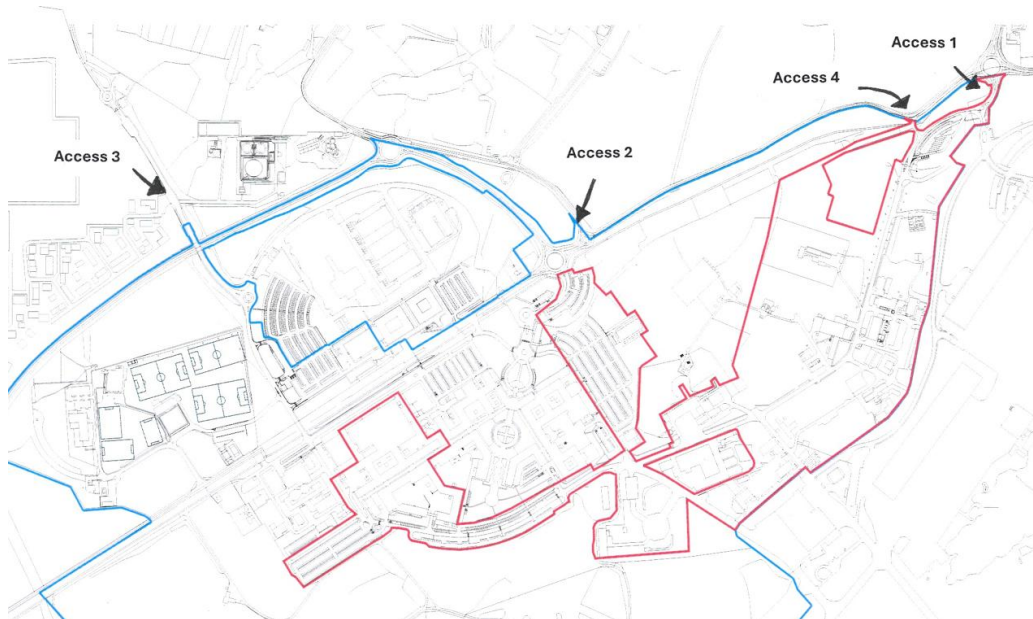
To the north of the Ball Hill portion of the application site, the site wraps around land designated as the Ball Hill Site of Importance for Nature Conservation (SINC – a local nature conservation site), with a section of Ively Road and an adjoining cycleway abutting to the north. The south-west corner of Southwood Country Park is situated on the opposite side of the road at this point.

There are four existing vehicular access points into the application site:-

- **Access 1** shared with Farnborough Airport at the Ively Roundabout at the junction of Ively Road with Elles Road (A327);
- **Access 2**, which is the existing main entrance into CTP at the Whittle Roundabouts that forms the junction of Ively Road with Kennels Lane (south) and Concorde Road; and
- **Access 3**, which is from Bramshot Lane from the Pyestock Roundabout at the west end of Summit Avenue into the north part of CTP via a bridge over New Ively Road within

Hart DC's area; and further south into CTP South within Rushmoor via a further bridge over Victor Way.

- **Access 4** (aka 'Ively Gate') is situated close to **Access 1** and is not currently regularly used, but has provided an entrance into an area of the application site close to Ively Road north of Ball Hill. This access has been used historically to gain access to land north of Ball Hill for open storage, usually of vehicles.



Location of Existing & Proposed Vehicular Accesses to serve the Proposed Development.

The whole of CTP and Ball Hill has an existing security-fenced perimeter and is not accessible to the general public.

The main internal roads within the application site are Concorde Road at Access 2, which is crossed by Victor Way, which runs along the north and east sides of CTP South. Buccaneer Way loops around the south side of CTP South adjacent to the boundary with Eelmoor Marsh. Range Road crosses the Ball Hill portion of the site from Victor Way to Ively Gate (Access 1) near the Ively Roundabout.

The nearest residential neighbours to the application site are a pair of semi-detached houses at Nos.128 & 130 Old Ively Road situated close to the Whittle Roundabouts and Access 2. These houses are within Hart DC's area. The next nearest residential neighbours are at Nos.1 & 2 Pear Tree Cottages, Kennels Lane (south), which are properties within Rushmoor. Residential properties are also situated at the south end of the new Hartland Park housing development within Hart DC's area, with the nearest dwellings being approximately 500 metres north of the nearest part of the application site. Hartland Park has a roundabout access onto New Ively Road where it loops around the north of CTP North and the Cody Sports & Social Club to join the A323 Fleet Road/Norris Hill Road between Aldershot and Fleet at the Norris Hill Roundabout that bridges the Basingstoke Canal. The Canal itself is designated as a SSSI.

The application site currently comprises a number of older office and industrial style buildings, local roads, hardstandings, paved at grade parking areas, groups of trees and managed landscape planting and grassland. The existing uses on site comprise a mix of light industrial, research & development, and manufacturing uses. A section of land north of Ball Hill adjacent to Ively Road has been used intermittently for open storage.

The Application Proposals : The application is for a phased mixed-use re-development of the site that is expressed in Outline Form with all matters except the means of access reserved for future consideration. Accordingly, the scale, layout, appearance and landscaping of the proposed development are 'Reserved Matters' and not for detailed consideration at this stage.

The description of the submitted planning application is: **“Outline planning application for phased development involving demolition of existing buildings and the erection of new flexible use employment floorspace (Use Classes E(g)(i)-(iii)/B2/B8 (including data centres) and associated works. All matters reserved except access.”**

Officer Note: An Outline planning application submits proposals in abbreviated form seeking consent in principle to a limited range of aspects of those proposals.

This form of application is normally only used for larger or more unusual development proposals. Outline applications are a preliminary planning application option provided within the planning legislation to enable developers to find out if there are any issues of principle and basic detail to resolve before they get too far into planning the details of their proposals.

If Outline planning permission is granted this does not act as consent for development to begin. Once outline planning permission has been granted, one or more 'Reserved Matters' applications must then be made in order to complete approval for the development proposals at the level of detail that is expected with a conventional fully-detailed planning application.

The details contained with Reserved Matters application must be consistent with those of the parent outline approval, including any conditions that are attached to it.

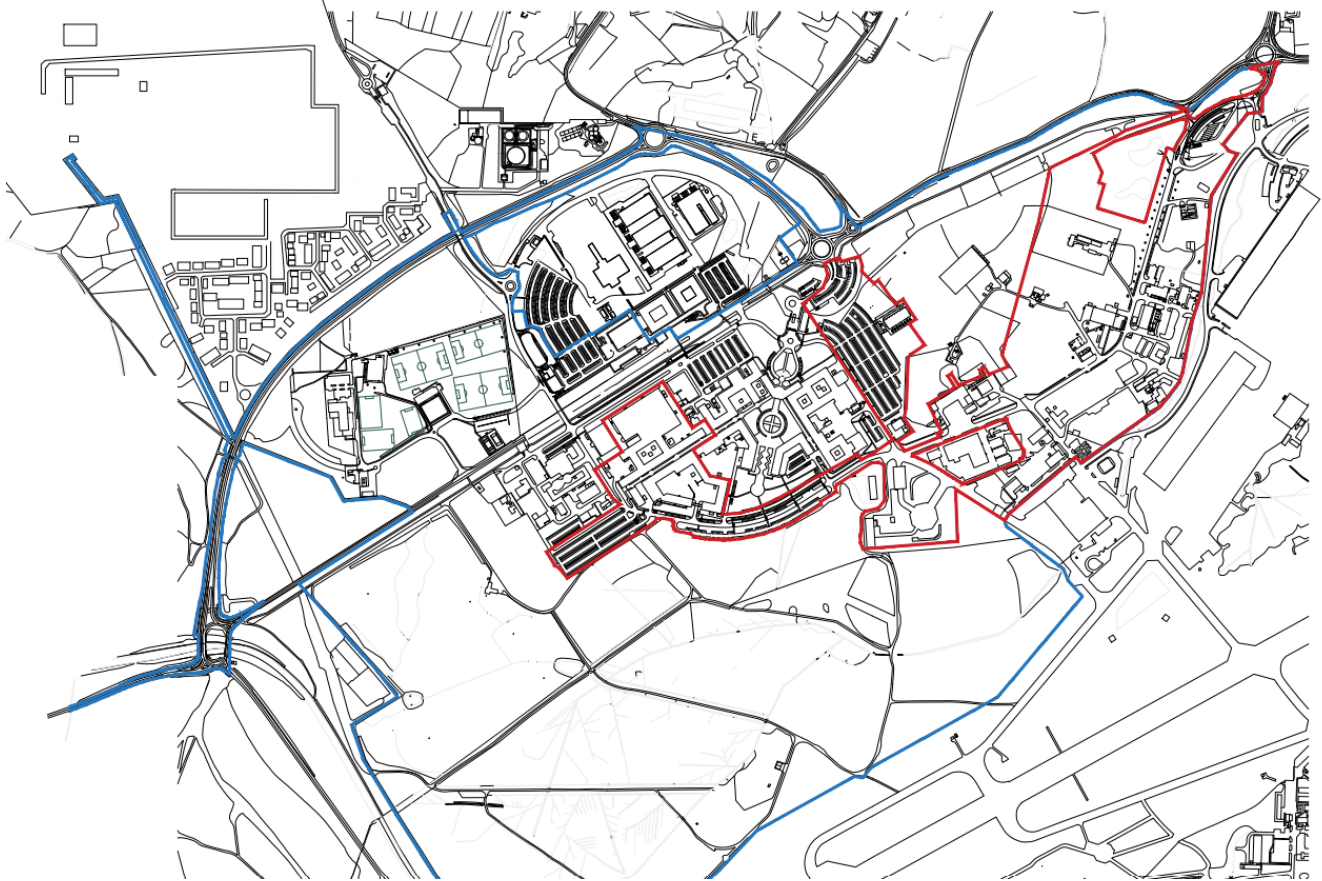
The proposed accesses to the development would be via the existing Accesses 1-4 as detailed on the Access Parameter Plan. All other 'matters' relating to 'Scale', 'Layout', 'Appearance' and (the details of) 'Landscaping' are reserved for future consideration with Reserved Matters applications.

The proposals represent a sustained, long-term investment commitment to CTP, with the proposed development to be delivered over a 15-year time frame. The proposals specifically include flexible units to accommodate new and growing businesses; plus also 'data centre' facilities - which are a growing area of commercial development within the UK. The proposals also seek to retain key tenants on the site on the site such as QinetiQ, with potential to provide a new headquarters for them as a flagship R&D facility. The application also indicates that it is intended to incorporate other sustainable features including solar photovoltaic panels and electric vehicle charging points. Biodiversity and landscaping improvements would be delivered, including biodiversity net gain to achieve at least a 10% increase in BNG value, alongside the use of sustainable drainage systems. Greener travel would also be promoted and cycleways upgraded with new lighting for the key routes to, from and within the CTP Campus. In summary, some keys points of the proposals advocated by the Applicants are as follows:-

- Providing a National centre of excellence for technology firms;
- New employment floorspace up to 143,000 sqm;
- Investment into CTP of around £1bn, boosting the local economy;
- Strengthening Farnborough's role as a national innovation hub, attracting investment and talent into the area;
- Landscaping improvements with a biodiversity net gain of at least 10%;
- Promoting greener forms of travel, including cycleway upgrades;
- Offering opportunities for collaboration between academia, industry, defence and Government;
- Providing sustainable drainage systems where there is currently little or no provision;
- A phased redevelopment, minimising disruption;
- Retaining existing tenants and provision for a new headquarters for a flagship R&D facility; and
- Creating between 632 to 872 skilled jobs, supporting economic growth across the region.

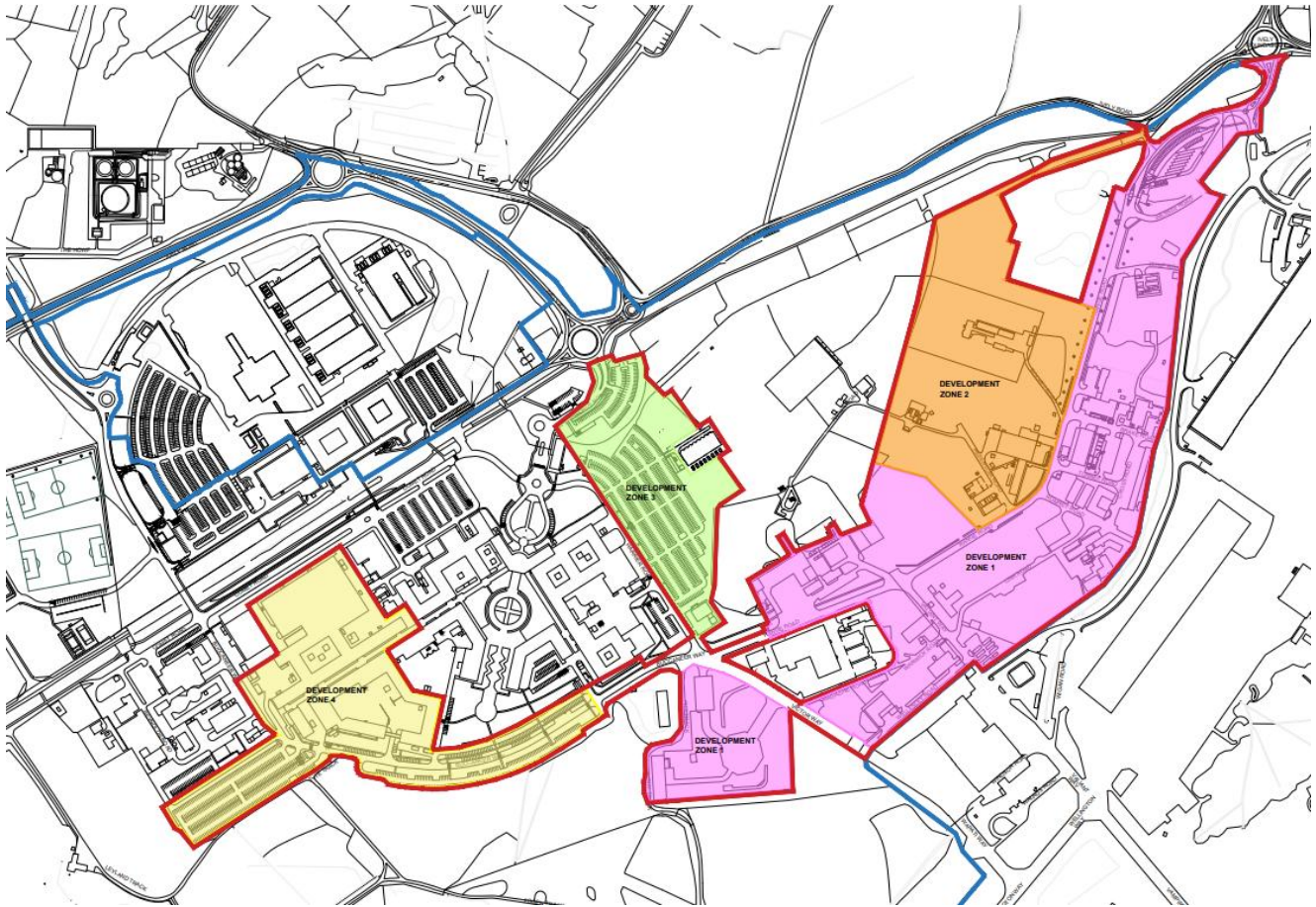
Plans for Determination : A set of Parameter Plans have been submitted for determination with the application. These variously describe the maximum built volume and distribution of the proposed development across the application site. If outline planning permission is approved and implemented, the developers would be obliged to comply with what is shown by the Parameter Plans when they submit Reserved Matters applications - including with any of the textural information contained on the plans. The Parameter Plans are comprised as follows:-

A **Site Location Plan**: See below. This simply shows a red-line defining the extent of the application site; and also, in this case, a blue-line encompassing further land beyond the red-line : this denotes land that is also within the Applicants' ownership and control that is not situated within the application site for the current planning application. Some parts of the blue-lined land are located within Hart DC's area.



Site Location Plan showing Red- and Blue-Lines : not to scale.

A **Development Zone** Parameter Plan (see overleaf) : which identifies with colour-coding 4 zones for future development phasing within which it is proposed development would take place : Development Zones 1-4 inclusive. This Development Zones Parameter Plan contains a table setting out some important written detail of the proposals for each of the proposed Development Zones (DZs 1-4) in respect of proposed uses, maximum building heights and proposed maximum floor areas for the development that they could contain, which is also set out overleaf. In this respect, for additional clarity, the applicants have indicated that DZs 2 & 4 are intended to comprise solely 'data centres' within Use Class B8 and no other form of B8 use; and, as a result, they have invited the imposition of a condition to restrict these Development Zones to 'data centre' use only.



Development Zone Parameter Plan : not to scale

COLOUR KEY	PROPOSED DEVELOPMENT USE CLASSES	PROPOSED MAXIMUM HEIGHTS PER PHASE	PROPOSED MAXIMUM FLOOR AREAS GEA M ²
	Development Zone (DZ)1 Flexible Development E(g)(ii), E(g)(iii), B2 & B8	20m (89.400m AOD)	46,000m ²
	Development Zone 2 Data Centres, B8	22m (89.050m AOD)	35,000m ²
	Development Zone 3 HQ E(g)(i), E(g)(ii), E(g)(iii), B2 & B8	25m (101.430m AOD)	32,000m ²
	Development Zone 4 Data Centres, B8	22m (97.810m AOD)	30,000m ²

NOTES:

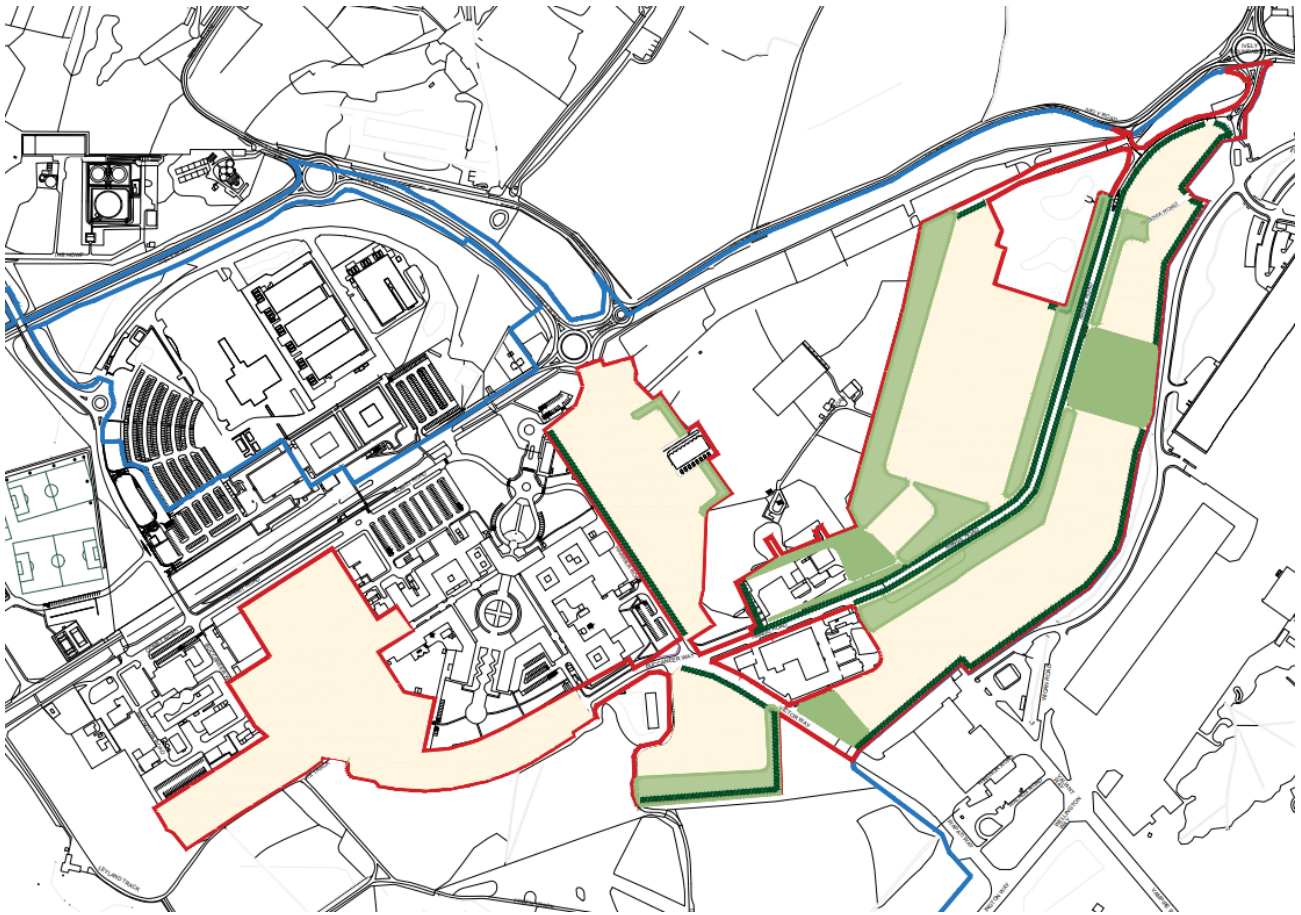
DZ- ASSOCIATED ACCESS, INFRASTRUCTURE AND LANDSCAPE WORKS MAYBE UNDERTAKEN OUTSIDE OF THE DEVELOPMENT ZONES WITHIN THE APPLICATION BOUNDARY

HEIGHT - THE MAXIMUM HEIGHT OF BUILDINGS, ANCILLARY STRUCTURES AND PLANT IS TO BE MEASURED FROM THE FFL 150MM ABOVE THE PROPOSED DEVELOPMENT PLATFORM LEVEL TO THE TOP OF THE TALLEST STRUCTURE (THIS IS INCLUSIVE OF ROOF PLANT & ENCLOSURES). NO BUILDINGS TO BE ERECTED IN LANDSCAPE ZONES. MAXIMUM BUILDING HEIGHTS AOD ARE CALCULATED IN RELATION TO THEIR INDICATIVE PLATFORM LEVELS AND HAVE A +/- 500mm DIFFERENCE TO ALLOW FOR TOLERANCE.

AREA- TOTAL MAXIMUM FLOOR AREA GEA - 143,000m²

Development Zones Parameter Plan Textural Information and colour key.

A **Strategic Landscaping** Parameter Plan and attached Key: See Overleaf. this identifies areas of land, particularly within Zones 1 and 2 that would be reserved and kept free of development in order to provide Strategic and On-Plot Planting, in effect, defining for some Zones a limited horizontal extent of development. Limited or no proposals for strategic landscaping are shown for DZs 3 & 4 because these are intended to be later phases of the development where less detail is known and presented at this early stage.



Strategic Landscaping Parameter Plan : not to scale

This Strategic Landscaping Parameter Plan also has a key to identify the position of either Strategic or On-Plot Planting; and also notes that gaps will be required in order that accesses can be formed into and out of the Development Zones, in addition to some landscaped car parking areas:-

KEY:



DEVELOPMENT ZONE



STRATEGIC PLANTING (NO BUILDING FOOTPRINTS TO BE POSITIONED IN STRATEGIC PLANTING ZONES)

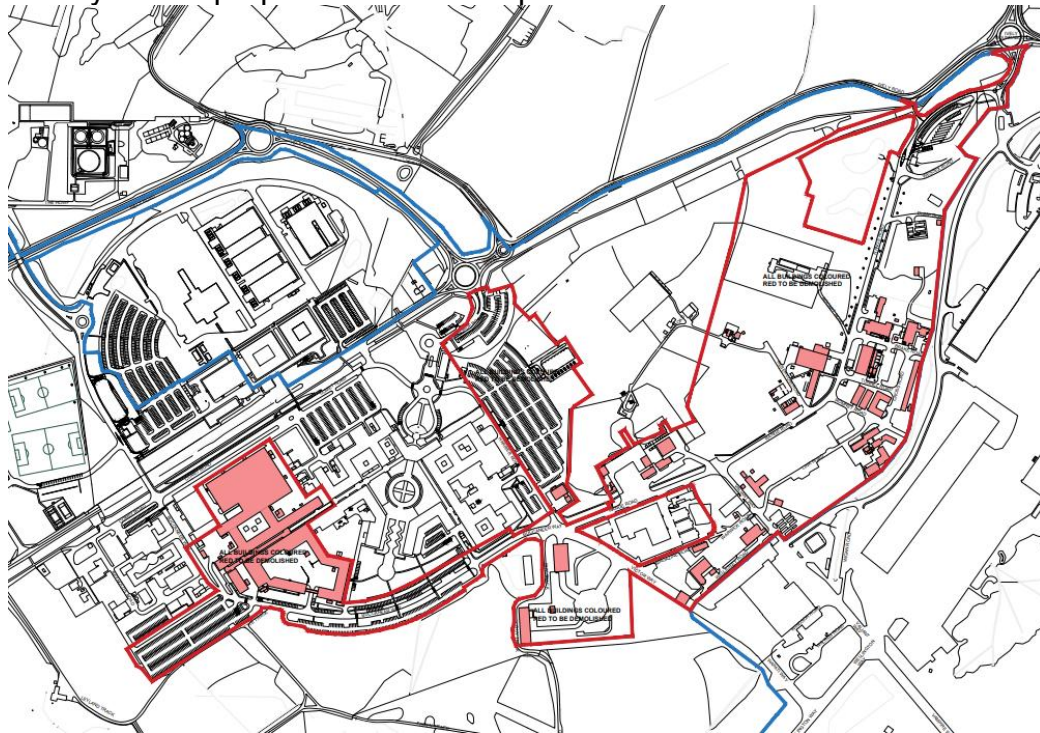


ON PLOT PLANTING SECURED BY RESERVED MATTERS

NOTE:

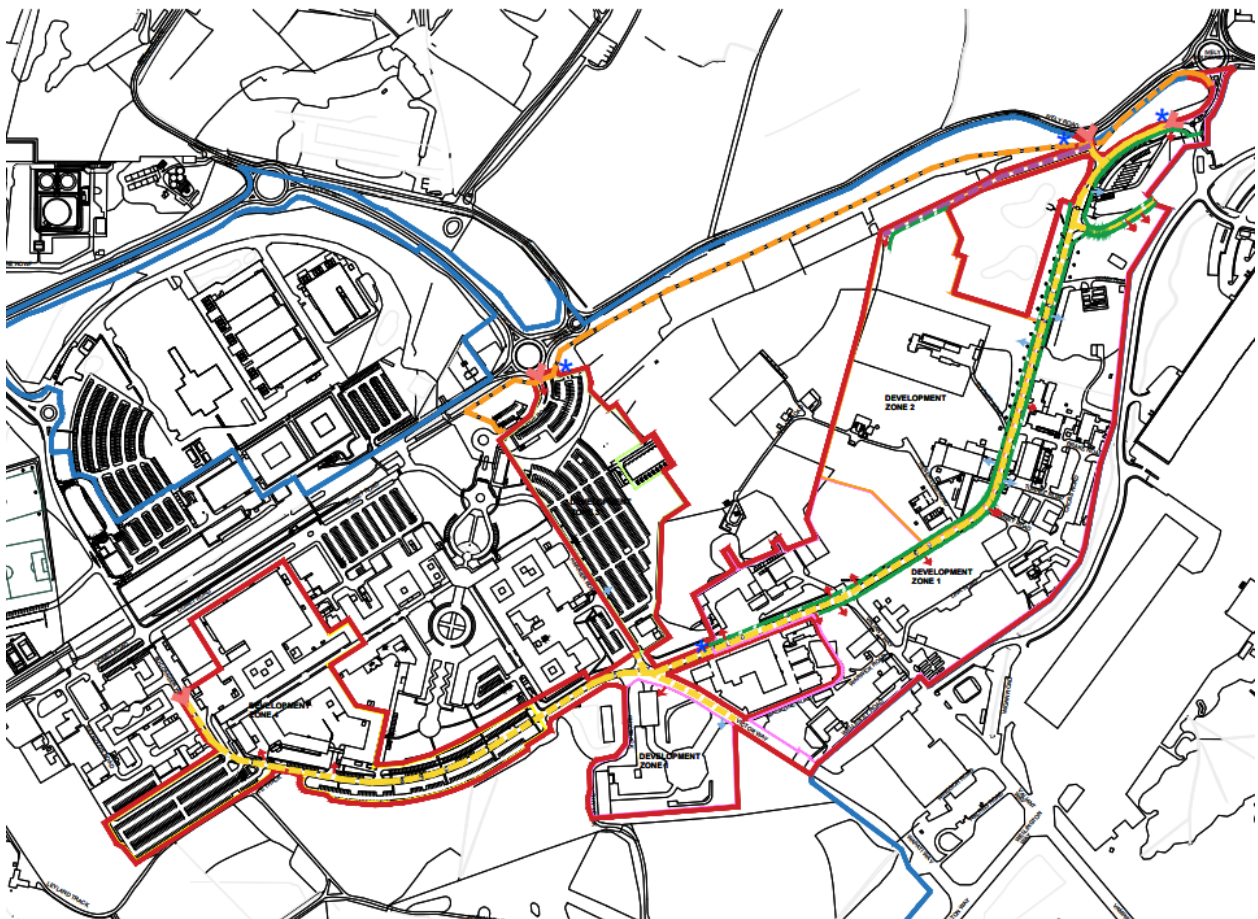
STRATEGIC & ON PLOT PLANTING ZONES WILL ALLOW BREAKS FOR PLOT ACCESS AND LANDSCAPED CAR PARKING

A **Building Demolition** Parameter Plan : this simply identifies the totality of all of the buildings and structures (shaded in red) that would be demolished and removed from the application site to make way for the proposed new development:-



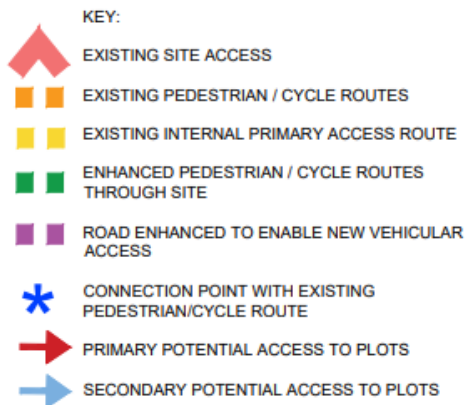
Building Demolition Parameter Plan : not to scale

An **Access** Parameter Plan : identifies the means of access to the proposed development with detailed approval sought at the outline stage, comprising Accesses 1-4 inclusive.



Access Parameter Plan : not to scale

The Access Parameter Plan shows a lot of detail, albeit largely internal to the application site, but with existing access routes to be enhanced situated within blue-lined land. The various elements of existing and proposed means of access are colour-coded with the following Key:-



NOTE:

EXISTING ACCESS, PATHS & ROADS TO BE RESURFACED, MADE GOOD AND ALTERED TO SUIT DEVELOPMENT PROPOSALS AND RECONSTRUCTED WHERE REQUIRED.

ACCESS TO PLOTS WILL GENERALLY BE PROVIDED VIA NEW ACCESS POINTS FROM RANGE ROAD, WESSEX ROAD (AND OTHER EXISTING INTERNAL ESTATE ROADS).

ACCESS POINTS INTO PLOTS WILL VARY SUBJECT TO PLOT DESIGN.

EACH PLOT WILL HAVE A RANGE OF ONE TO FOUR VEHICULAR ACCESS POINTS.

The Access Parameter Plan identifies the four principal means of vehicular and other access into and out of the proposed development, which are all existing accesses into CTP South : Accesses 1-4 inclusive. as follows:-

Access 1: Range Road - from the north-west via the A327 Ively Road to the northeast, entering the site via the Ively Road Roundabout.

Access 2: Concorde Road - from the north via the Whittle Roundabout which connects to Ively Road to the west and Kennels Lane (West) (and onward to the A327) to the north;

Access 3: Bramshot Lane – from the north-east which connects to the A327 at the Pyestock Roundabout, crossing Ively Road via an overbridge; and

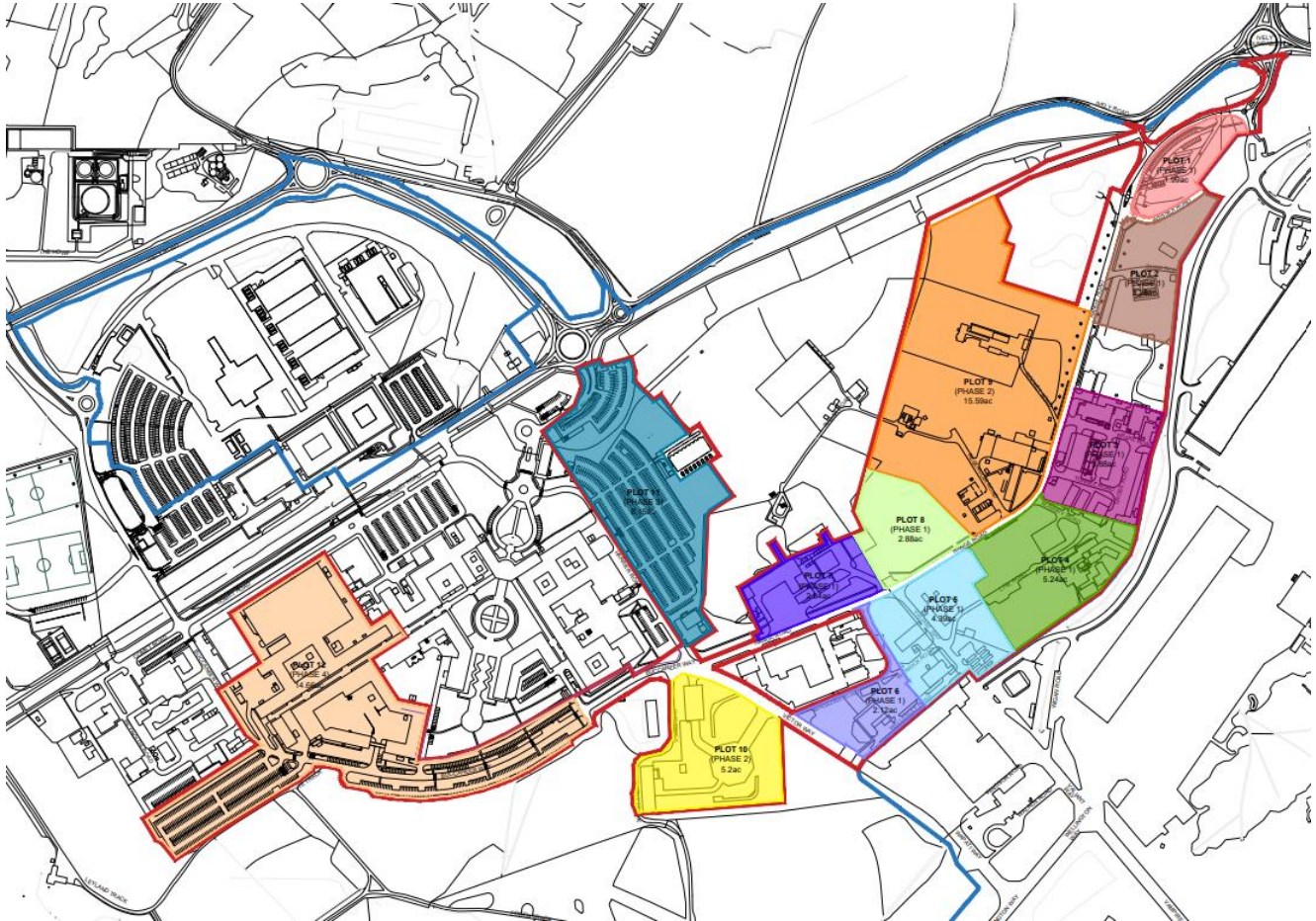
Access 4: Ively Road – a secondary access located near Access 1, the entrance to Access 4 is directly off Ively Road (known locally as 'Ively Gate'), and is indicated to principally serve the proposed data centre uses within DZ2 only.

Also proposed for determination at the outline stage with the current application are detailed development parameters that are set-out in a **Design Code** document [listed as **Doc.8 at Appendix 1 to this Report**]. The current version of this document (January 2026) was submitted on 2 February 2026:-



Cover Page of Design Code document (January 2026)

Illustrative Plans : In addition to the plans and particulars that have been submitted for determination with the current application, it is supported by illustrative plans and other material that seek to provide a vision of how the development might appear in detail when implemented. Indeed, the production of some illustrative material has been necessary in order to help to assess the various impacts of the proposed development with the Environmental Statement. However, none of the details indicated with this illustrative material are to be determined with the current outline application – the illustrative material seeks to provide a tangible vision of how the proposed development may be built-out. The principal Illustrative material that has been provided comprises (a) a Development Plots plan; and (b) an Illustrative Masterplan, as follows:-



Illustrative Development Plots Plan : not to scale

The accompanying Key to this illustrative plan is as follows:-

DEVELOPMENT ZONE 1 - BALL HILL DEVELOPMENT:

- PLOT 1 - 1.96 Acres
- PLOT 2 - 3.28 Acres
- PLOT 3 - 3.88 Acres
- PLOT 4 - 5.24 Acres
- PLOT 5 - 4.39 Acres
- PLOT 6 - 1.34 Acres

- PLOT 7 - 2.84 Acres
- PLOT 8 - 2.88 Acres
- PLOT 10 - 5.15 Acres

DEVELOPMENT ZONE 2 - BALL HILL DEVELOPMENT:

- PLOT 9 - 15.59 Acres

DEVELOPMENT ZONE 3 - NEW HQ BUILDING:

- PLOT 11 - 8.15 Acres

DEVELOPMENT ZONE 4 - CURRENT QINETIQ HQ A5 & A7 REDEVELOPMENT

- PLOT 12 - 14.66 Acres

NOTE:

PLOT CONFIGURATIONS MAY CHANGE WITHIN EACH DEVELOPMENT ZONE (I.E COMBINE, SPLIT, EXTEND OR CHANGE IN SHAPE) AT RESERVED MATTERS STAGE SUBJECT TO CHANGING MARKET DEMANDS AND OR POTENTIAL END USER DEMAND AND DESIGN DEVELOPMENT

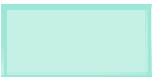
The illustrative Masterplan submitted with the application builds upon the various proposed development parameters on the basis of the illustrative Development Plots plan to provide the following pseudo-aerial image of the proposed development in respect of DZs 1 and 2:-



Illustrative Masterplan Image

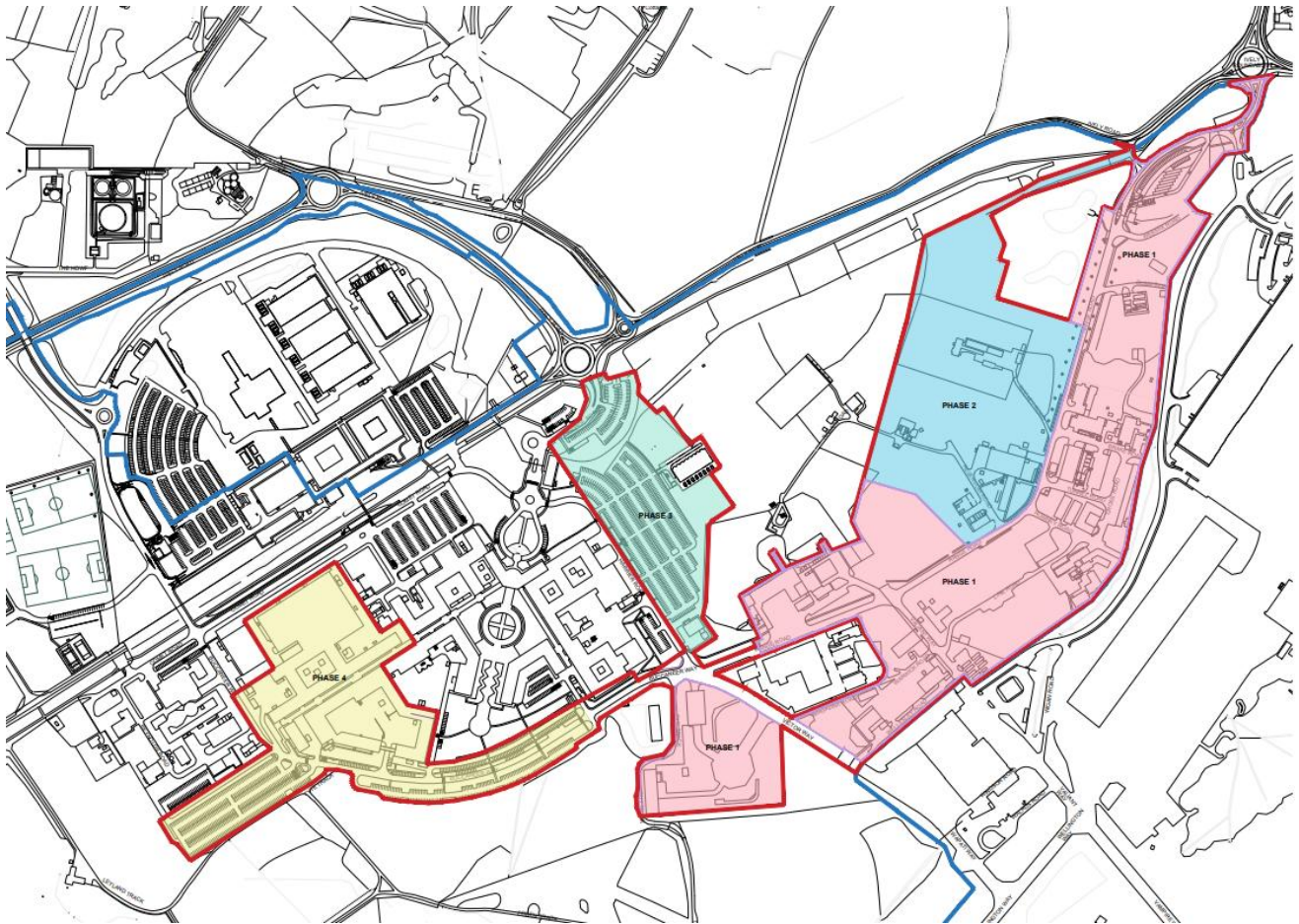
No illustrative masterplan imagery is shown for DZs 3 & 4 since these Zones are anticipated to be delivered as later phases of the proposed development and are currently less resolved even in illustrative form. In this respect, an illustrative **Phasing Plan** has also been submitted with the application that identifies 4 colour-coded tentative phases of development with DZs 3 & 4 being later phases of the proposed development, below and overleaf:-

ILLUSTRATIVE PHASING PLAN

	Phase 1 - BALL HILL FLEXIBLE EMPLOYMENT USES
	Phase 2 - BALL HILL DATA CENTRES
	Phase 3 - NEW HQ BUILDING
	Phase 4 - CURRENT HQ A5 & A7 REDEVELOPMENT DATA CENTRES

NOTE:

ACCESS, INFRASTRUCTURE & LANDSCAPE WORKS OUTSIDE OF DEVELOPMENT PLOTS WITHIN THE APPLICATION BOUNDARY MAY BE BROUGHT FORWARD ALONGSIDE DEVELOPMENT PHASES



Illustrative Phasing Plan

Application Documentation : The application is supported by an extensive suite of supporting documentation referring variously to both the Plans for Determination, Design Code document [Doc 8] and/or the Illustrative Plans as necessary. These are listed at **Appendix 1** to this Report and provided with a **Doc** numbering system to be used throughout this Report.

S106 Agreement : In addition to the controls to define and guide subsequent Reserved Matters Applications for the proposed development which are the subject of recommended Suggested Conditions [set out later in this Report following the Full Recommendation] and the Design Code document (in amended form received in January 2026) [Doc 8], the applicants indicate that they are willing to enter into a s106 Legal Agreement to secure, highways financial contributions as may be agreed with the Highway Authority (Hampshire County Council) and Ecology and Biodiversity Net Gain requirements. It is also noted, as explained in more detail in the **Relevant Planning History** section of this report to follow shortly) that there will be a need to, in some way, vary the original 1995 Legal Agreement relating to the existing former DRA development to reflect the changes that arise as a result of the current proposed development.

Environmental Impact Assessment (EIA) : Due to the scale of the proposals, the application is classed as 'EIA Development' falling within Paragraph 10(b) of Schedule 2 (Discretionary requirement for EIA) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The application is accompanied by an Environmental Statement (ES) (in 3 volumes). The ES refers to a number of its own supporting documents [**Docs ES2, ES3 & ES4 plus various appendices**] and there is a Non-Technical Summary [**Doc ES1**]. An EIA scoping opinion was originally issued by the Council on 7 May 2025, confirming the matters which should be addressed by the Environmental Statement (ES) relating to proposed development (25/00180/SCOPE). The Council's supplemental report evaluating the technical content of the ES is attached at **Appendix 2** of this Report.

Relevant Planning History

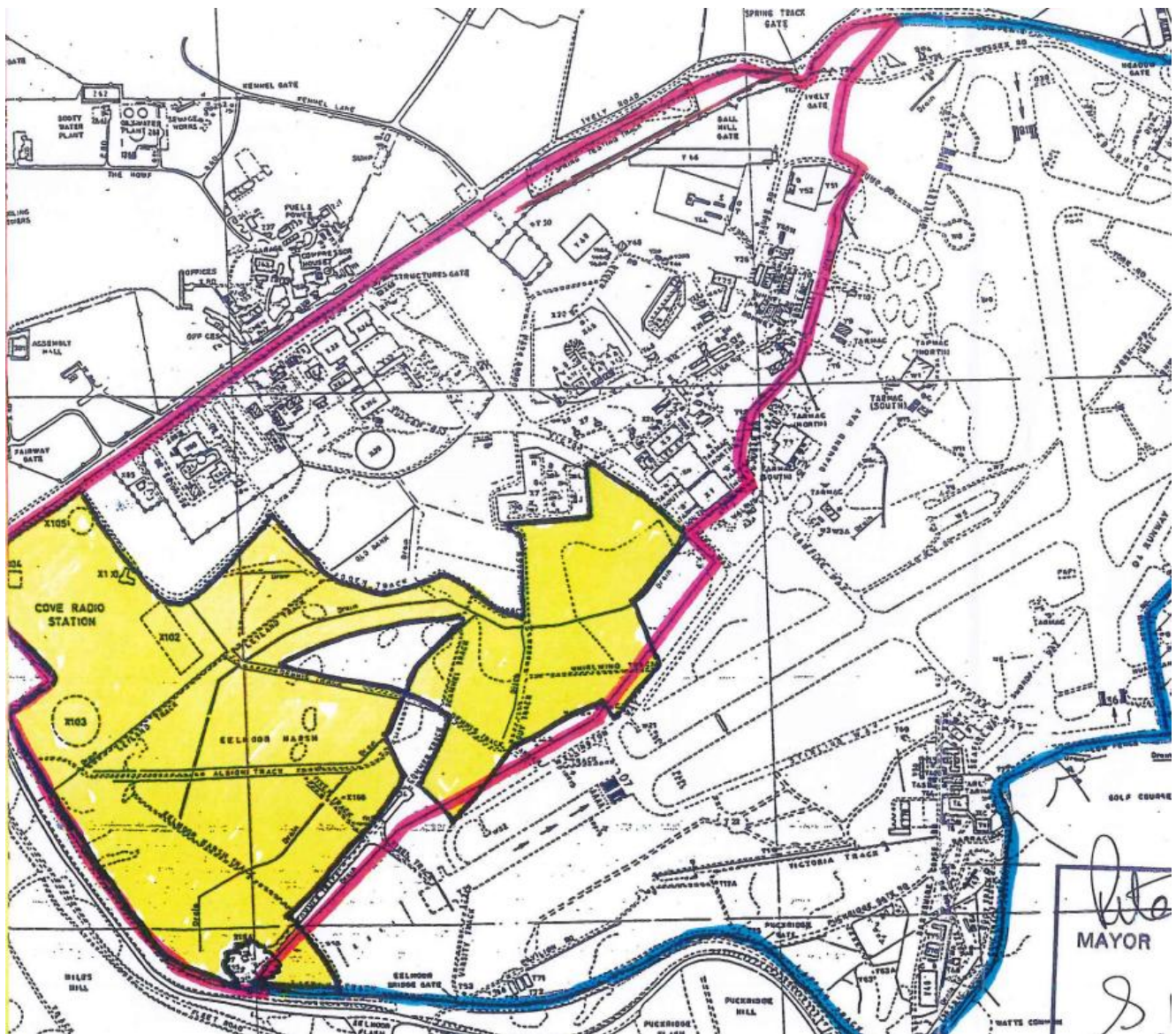
Some aspects of the planning history of the current application site are alluded to in the supporting text to Local Plan Policy PC5 (Cody Technology Park) within the adopted Rushmoor Local Plan (2014-2032) published in February 2019, which states:- *“.....it is estimated that approximately 87,000 square metres of existing floorspace has already been constructed or is committed at the site.....falling within use classes B1(a), (b) and (c)”*.

Historically, the development that has become Cody Technology Park involved land in Crown ownership, initially as the site of the Defence Research Agency (DRA) resulting from the re-location and amalgamation of the Royal Aircraft Establishment (RAE) onto the site. This amalgamation was largely from its main site near Farnborough town centre adjacent to the east side of Farnborough Aerodrome onto former RAE land at what was then known as the ‘X & Ball Hill Sites’ south of Ively Road. The ‘X & Ball Hill Sites’ contained an assortment of buildings, some dating from the 1930s, but most notably including the 5m Wind Tunnel complex constructed in the 1960s for the structural testing of Concorde. The wider Cody Technology Park also covers land situated within Hart District Council’s area at what was previously the National Gas Turbine Establishment (NGTE) situated to the north of Ively Road at Pyestock. The DRA eventually became privatised as QinetiQ, a British defence technology company, in 2001; and QinetiQ still occupy some floorspace within CTP South.

As a consequence of having Crown immunity from planning controls, the re-development of the X & Ball Hill Sites into the DRA in the early 1990s was not subject to standard planning controls. At that time development proposals of all sizes for MoD land were required to follow a formal consultation process as specified in Circular 18/84 (“Crown Land & Crown Development”). In this respect, in 1993, a Circular 18/84 Consultation (93/00577/C1884) was submitted to the Council for the *“demolition of buildings, erection of 77,000 sqm of new buildings [Officer Note : amounting to a net addition of 49,418 sqm of floorspace when existing floorspace to be removed was taken into account] and refurbishment of 600 sqm of existing buildings to provide a high-technology use, together with access, parking and landscaping”*. In January 1994, the Council’s Planning Committee (Development Control Matters) resolved to raise no objection to this consultation subject to the prior completion of legal agreements. Because the application site straddled the boundary into Hart District Council’s area, Rushmoor BC simultaneously considered and raised no objections to a corresponding adjacent authority consultation from Hart DC for the proposals, 93/00683/ADJ.

The DRA re-development of the X & Ball Hill Sites, which is land encompassing the entirety of the current application site, is subject to legal obligations under s299A (Crown Planning Obligations) of the Town & Country Planning Act 1990 (as amended) dated 17 January 1995, which was the mechanism by which some planning obligations and conditions were secured in respect of the DRA development. The Third Schedule of the s299A Agreement secures the retention, management and maintenance of the Eelmoor Marsh SSSI. It also secures Obligation No.2 to retain, repair and maintain the replica Cody Tree monument at CTP South. The Fourth Schedule requires compliance with a total of 22 planning conditions relating to the development; notably including Condition No.4, which defines the quantum and nature/use of the proposed DRA development, stating that:-

“4. The total gross external floor area of the Development shall not exceed 106,572 sqm and shall be restricted to high technology and/or light industrial use within Class B1(b) and (c) of the Town and Country Planning (Use Classes Order 1987 including ancillary office and storage use. No additional floorspace shall be created within the buildings and the buildings shall not be used for any other purpose within Class B1 of the Town and Country Planning (Use Classes) Order 1987 unless first agreed in writing by the Local Planning Authority.”



Extract from the plan attached to the 17 January 1995 s299A Agreement showing the extent of land the subject of the DRA proposals and the Agreement outlined in red. The yellow shaded area is the land at Eelmoor Marsh subject to "retention, management and maintenance". The blue line relates to the remainder of the land then in Crown ownership as the Royal Aircraft Establishment prior to the sale of the land and the advent of Farnborough Airport.

The DRA development was subsequently implemented and completed.

The DRA development was subject to three smaller-scale precursor developments also the subject of Circular 18/84 consultations that were considered individually by Committee:-

- Erection of EMC Range, EMPG building and lightning test facility and associated works at Land off Victor Way, DRA : No objection raised 30 September 1993, 93/00346/C1884. This development is located within the current application site at Plot 10 within DZ1 and proposed to be demolished;
- Erection of new rotor rig building at Wind Tunnel Complex, Ively Road : No objection raised 8 November 1993 (93/00543/C1884), albeit located within the blue-lined land outside of the red-line of the current application site; and
- Erection of high-power laser laboratory building at Land at Range Road, DRA : No objection raised 8 November 1993, 93/00559/C1884. This development is located

within the current application site at the southern end of DZ3 and shown to be demolished.

Crown immunity in respect of planning matters ceased in 2006, marked by Circular 18/84 being superseded by Circular 02/2006.

In 2004 a Certificate of Existing Lawful Use (04/01001/EDC) was issued by the Council confirming the lawful use of all buildings on the DRA site to be within Use Class B1. This established formal planning status for the existing buildings which had, until that point, benefited only from the Crown immunity granted under the 1995 consultation.

Recently, planning permission (25/00148/FULPP) was granted in June 2025 for external alterations to the front and rear façade of Building A1 within the existing CTP South campus (outside of the Application Area). This forms part of an initial phase of enhancement works aimed at bringing the existing CTP South campus buildings up to a more modern standard and creating a more attractive working environment within.

Consultee Responses

HCC
Highways
Development
Planning

Response #3 (7 May 26) : **No Highway Objections subject to the imposition of conditions** to secure/require:-

- an Operational Management Plan in respect of each phase of development (or part thereof) as requested by National Highways;
- a Construction Traffic Management Plan in respect of each phase of development (or part thereof);
- Development Zones 2 and 4 identified by the Parameter Plans as B8 use be restricted to Data Centre use only [Officer Note: as proposed by the Applicants]; and
- That the following matters be a consideration at Reserved Matters stage:
 - Improved pedestrian and cycle routes within the site to enable convenient travel to the development units from the Property entrances and between locations within the Property;
 - Secure, covered cycle parking in excess of minimum local standards to encourage cycle commuting; and
 - Facilities within development to help enable cycling, including changing rooms and showers.

and the completion of a satisfactory s106 Agreement to secure the following:-

- **An Active Travel Modes financial contribution** towards the delivery of pedestrian and cycle improvements, including identified LCWIP measures, between the proposed site and Fleet and Farnborough, amounting to:
 - a) £2,967,747.00 to be secured in the event that DZ1 comes forward as a mix of uses, or:
 - b) £3,524,602.00 to be secured in the event that DZ1 comes forward as primarily research and development uses to mitigate the transport impacts of the development and promote sustainable modes of travel;

- **Off-Site Highway Improvement Works** comprising pedestrian and cycle improvements to:-
 - the Range Road access as shown in principle on drawing 2403065-05 Rev B;
 - Ively Roundabout and Elles Road as shown in principle in drawings 2403065-07 rev B;
 - Norris Hill Roundabout pedestrian and cycle improvements as detailed in drawing 2403065-04 Rev C; and
 - Ively Road existing footway/cycleway (north of Ball Hill) – maintenance, drainage and lighting improvements.

However, should the above-mentioned highway works be deemed undeliverable, an equivalent financial contribution amount to be secured towards alternative pedestrian and cycling infrastructure on routes connecting the proposed development to Fleet and Farnborough, such measures to be consistent with, or supportive of, the principles and priorities set out within the LCWIP or any subsequent strategy as may be in the future.

[Officer Note: the Applicants will, in addition to the s106 Agreement requirements, also need to enter into a legal agreement with Hampshire County Council under s278 of the Highways Act in order to secure the undertaking of the off-site highway works and/or improvements that are identified. The s278 Agreement process operates outside of the Planning system and is not, in itself, a matter for consideration with planning applications. Nevertheless, it is important to understand that there is a separate regulatory regime and mechanism that exists to approve and require that acceptable off-site highway works are undertaken in an appropriate timescale tied to the proposed development. The s278 Agreement is usually a separate legal document, however it can sometimes be consolidated into a joint legal document combined with a s106 Agreement if the s278 processes can be completed in a similar timescale. However, whether or not this would be possible in the current case would be a matter for the Highway Authority to decide.]

- **On-Site Improvement Works** comprising:-
 - the upgrading of the existing bus stop at the Concorde Way Access to include a larger shelter, covered seating, and a real time information board; and
 - Provision of a new bus stop at the Range Road access including shelter, covered seating, and a real time information board;
- **Travel Plan Evaluation, Completion, Adoption and subsequent Monitoring** involving:- The submitted Framework Travel Plan **[Doc 14]** to be updated to reflect the preceding improvements and impose a requirement to secure individual occupier Travel Plans for each development phase (or part thereof) of development; and secured, along with appropriate cash deposits and evaluation and monitoring fees, prior to occupation
- **A Bus Shuttle Service** : to be secured and implemented in accordance with the proposed public transport strategy for the lifetime of the development to include the following improvements:-
 - Increased shuttle bus frequency to 4 buses in the AM and PM weekday

peaks;

- Provide a lunchtime service to the town centre;
- Additional services to be provided to deliver the bus capacity needed to support the mode share targets set out in the Framework Travel Plan and ensuring the need is reviewed regularly through the Travel Plan Monitoring Surveys to ensure patronage levels are catered for;
- Incorporating two additional stops on the Cody Technology Park Shuttle bus service/ route at:-
 - (a) Kingsmead in Farnborough; and
 - (b) On Range Road in addition to the existing stop on Concorde Road, serving the proposed expansion to Cody Technology Park, with passenger facilities including a shelter, covered seating, timetable information and street lighting.

[Officer Note: The #3 consultation response summarised above has resulted from the detailed comments provided with HCC with their previous #1 (8 December 2025) and #2 (18 February 2026) consultation responses and Holding Objections that requested more and amended information, subsequent discussions between the Applicants and HCC Highways.]

National Highways	Response #3 received 7 April 2026 : No objections subject to conditions to require the submission for approval and subsequent implementation of: (a) a Construction Traffic Management Plan; and (b) an Operational Management Plan in respect of each phase of the proposed development in the interests of managing the traffic impacts of the proposed development upon the strategic road network including the M3 Motorway.
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[Officer Note: the #3 response above follows Holding Objections applied by National Highways received 3 November 2025 and 26 January 2026 requiring that the planning not be determined until National Highways had reviewed the proposals and understood the potential impact of the development on the safe and efficient operation of the Strategic Road Network and the M3 Motorway. In this respect, National Highways has confirmed that they are content with the methodology and robustness of the approach taken with the application submissions.]

Scottish & Southern Energy	No response received.
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Lead Local Flood Authorities	Response #2 : 8Dec25 : No objections subject to conditions following receipt of requested additional information [Doc 20] . Response #1 : 27Oct25 : More information required.
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County Archaeologist	Response #3 (11 Feb 2026) : No objections subject to conditions confirmed. Responses #1 (27 Oct 2025) and #2 (16 Jan 2026) : No objections in principle, but more information required.
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Active Travel England	Following a high-level review of the above planning consultation, Active Travel England has determined that standing advice should be issued and would encourage the Local Planning Authority to consider this as part of its assessment of the application. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-
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sustainable-development-advice-notes

ATE would like to be notified of the outcome of the application through the receipt of a copy of the decision notice, in addition to being notified of committee dates for this application.

Basingstoke
Canal
Authority

No comments received.

HCC
Planning

No response received.

Defence
Infrastructure
Organisation

No objections: The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of MoD sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. In this case the application site is situated beneath protected airspace called the Obstacle Limitation Surface (OLS) to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting RAF Odiham can do so safely. However, the DIO has confirmed that the OLS at this location is 91.4m above ground level (AGL), therefore only buildings or structures above this height would be of concern to the MOD. [*Officer Note: none of the building height parameters proposed with the application would get near this height.*]
At this location there is no restriction on the building materials as the application site is outside of the MOD technical safeguarding zone. Nevertheless, the MOD would have concerns with the creation of any habitats at the application site which have the potential to attract and support birds hazardous to air traffic such as the creation of large bodies of open water.

RBC
Ecology
Team

No objections subject to conditions and s106 to secure statutory BNG provisions. Detailed comments set out in the Ecology & Biodiversity part of the Commentary section of this Report.

RBC
Employment
& Skills

The redevelopment of Cody Technology Park could represent a significant long term investment in one of the Boroughs key employment sites. The proposals have the potential to strengthen Farnborough's position as a hub for high value technology, aerospace, defence and innovation led businesses.
The investment programme will deliver around 143,000 sqm of new and refurbished space over a period of 10 to 15 years, representing a major redevelopment proposal in the local economy. By positioning the Park as a UK centre of excellence for advanced technology, defence, AI, and security related industries, the redevelopment is expected to deliver economic impacts at local and wider spatial levels, based on information submitted by the Applicant.
The proposals are expected to yield employment benefits. Construction activity over the lifetime of the redevelopment will create demand for skilled contractors, consultants and specialist suppliers. Once operational, the enhanced campus is projected to support hundreds of additional jobs, with early consultation material suggesting the potential for around 750 new roles as part of the wider programme of site investment. These jobs are anticipated to include roles within skilled occupational categories, (subject to occupier requirements), supporting local workforce development and cementing Farnborough's reputation as a hub for advanced technology employment.

Another economic benefit lies in the retention and growth of key occupiers. The Park already hosts large organisations with links to the defence and aerospace sectors. Ensuring the provision of modern, secure and fit for purpose premises will help to safeguard the presence of these businesses in the area. Strengthening the presence of leading technology firms contributes directly to the borough's economic stability and productivity, supporting substantial supply chain activity and helping drive innovation led growth.

Beyond direct employment, the redevelopment will stimulate wider economic value through increased local expenditure. A larger workforce, a more diverse mix of occupiers, and improved on site facilities will contribute to demand for local services, retail, hospitality and leisure across Farnborough. Supply chain benefits are also expected to extend beyond the construction phase, with specialist technology, engineering and research firms likely to benefit from the expanded cluster of innovation oriented businesses operating within the campus environment. These clustering effects can enhance knowledge exchange, encourage collaboration between firms, and support the growth of SMEs and spin outs across the region.

Environment Agency Response #2 : 15 Dec 2025 : **No objections subject to conditions** following additional information received from the Applicants **[Doc 19]** on 14 Nov & 1 Dec 2025. Previous concerns relating to unacceptable risk of pollution to surface water quality have been satisfactorily addressed.
[Officer Note: this relates to the Camberley Sewage Treatment Works running over capacity issue that has emerged in recent EA consultation comments]

Nevertheless, the EA advise that the proposed development will only be acceptable provided that conditions are imposed in respect of:-

Land contamination : The planning decision should ensure that the site is suitable for its proposed use, considering any risks from contamination and any proposed land remediation. The planning application should therefore be supported by adequate site investigation information, prepared by a competent person. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. This approach is supported by paragraph 196 of the National Planning Policy Framework.

Water Quality : The current or previous use(s) of the site may present an unacceptable risk of contamination that could be mobilised during site works and construction, potentially leading to pollution of controlled waters - which are particularly sensitive in this location because the proposed development site is located upon a Secondary A aquifer. Accordingly, a planning condition must be imposed requiring the submission and validation of a detailed land contamination management strategy for unsuspected contamination during the enabling, construction and/or development works. This approach is in line with paragraph 187 of the National Planning Policy Framework.

The EA also reminds the Applicants of the need to consider the implications and regulatory requirements if they are to use Battery Energy Storage Systems (BESS); and also that the EA also regulates the abstraction of water from surface water and groundwater.

Farnborough Airport Safeguarding Officer **No objection:** - No impact. In principle, Farnborough Airport raises no objection to this application from an airfield safeguarding perspective. We do, however, require that careful consideration is given to the design of the Sustainable Drainage Systems (SuDS), including any planting schedules and mitigations, to minimize risks to aviation. We look forward to reviewing the detailed plans

against the airport's safeguarding criteria upon submission.

[Officer Note: these comments relate specifically to Airport Safeguarding only. Farnbough Airport has, however, raised objections to the proposed development in respect of other matters : see Neighbour Comments Received section that follows.]

Hampshire Fire & Rescue Service	The proposed project appears to involve a planning application deemed to present a low to medium level of risk. Please find attached a consolidated document containing advice that may be pertinent to the project. Please adopt the relevant advice. <i>[Officer Note: the relevant advice provided is generic and has been copied to the applicants' agents for their information and any action considered necessary.]</i>
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Southern Gas Network (Formerly TRANSCO)	No comments received.
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Guildford BC	Consultation acknowledged, but no subsequent comments received.
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Hart District Council	Provisional Comments Made: concerning the impacts upon Hart DC primarily in respect of highway matters. In this respect, the proposals must be considered not only by Hampshire County Council in their capacity as the Local Highway Authority (LHA) but also by National Highways. Given the Outline nature of the application and the unknown technical aspects as to highways safety impacts, the strategic implications for Hart District Council are currently unknown at this stage.
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Separately, Hart District Council also wish to take this opportunity to raise the following additional issues for further consideration by Rushmoor Officers and the Applicants:-

Local Bus Services: Given the scale of development proposed and the additional employment generation (circa additional 750 jobs), it is suggested that consideration be given to the provision of a regular local bus service to serve the proposed development and nearby settlements (Fleet and Farnborough), to promote sustainable travel within Hart District and Rushmoor.

Cycle Infrastructure: It is noted that the existing local cycle network may need improvement, with this planning application providing an opportunity not just for provision of new cycle routes, but to upgrade existing cycling infrastructure, both within and outside of the application site. In particular "Route 140", which is a primary cycle route that connects Fleet and Farnborough, which could be included in terms of enhancements via financial contributions to include, but not limited to, lighting and surfacing enhancements. This is therefore a matter which should be given consideration at outline stage, with the Applicants encouraged to engage with Hampshire County Council regarding the feasibility and logistics of a bus service and the cycle infrastructure.

Public Consultation: Consideration should be given to extending the public consultation area and remit to include the full phase of the nearby 'Hartland Village' scheme, which is sited within 300m of the application site, given the

potential 'knock-on' impacts on that residential site.

Light and Noise Pollution: Consideration should also be given to the light pollution aspects, both in terms of any implications for Farnborough Airport, and in terms of any ecological impacts, given that the land to the south is heavily wooded and may be home to multiple species.

Consequently, Hart District Council raise the above-mentioned provisional comments and concerns and reiterate that County (Highways) Officers assess the technical matters pursuant to the matter of highways safety, weighed against the provisions of Paragraph 116 of the NPPF (2024).

[Officer Note: at the time that this consultation response was received, Rushmoor BC had yet to receive a consultation response from the Highway Authority (Hampshire County Council : HCC). However, as of 7 May 2026, HCC has raised no objections to the proposals subject to conditions and s106 requirements.

With respect to the request for application consultation to be extended to Hartland Park properties within Hart DC's area, it is usual for planning application consultation to be undertaken directed to the neighbouring Council itself, with the expectation that the neighbouring Council will then, in turn, notify those residents within their area that they judge ought to be notified. In this case Rushmoor BC has notified those Hart DC residents located in close proximity to the proposed development at Old Ively Road. However, it is considered that Hartland Park, being at its closest point, over 500 metres separated from the application site, are too distant to justify individual direct consultation of residents there. Furthermore, in any event, it is considered that the Applicants' community consultation exercise, which directly mailed all address points within the Hartland Park development, has alerted and provided residents there with the opportunity to voice any comments, concerns and queries concerning the proposals should they wish – and the cumulative range of generic issues raised by respondents to the Applicants' consultation exercise are noted and are taken into appropriate consideration in this Report. The existence of the CTP application has also been subject to media publicity and site notices have been displayed in the vicinity of the application site.]

RBC Env. Health	No objections subject to conditions to address issues identified with air-quality, noise emissions and site investigation/remediation of ground contamination. Detailed comments are set out in the Commentary section of this Report in respect of these matters.
Natural England	No objection subject to appropriate mitigation being secured.
South East Water	No response received.
Surrey Heath BC	No objections.
National Grid (Electrical Power	No response received. <i>[Officer Note: there are separate licencing and power-supply procurement requirements and processes that the Applicants must meet/observe in respect of any new or upgraded power supplies that may be required for CTP.]</i>

Supply)

RBC
Arboricultural
Officer

No objections subject to conditions : my main concern is for the unnecessary loss of good grade A & B trees particularly during the demolition stage and before layouts have been finalised. In particular, I would prefer them to be protected from demolition harm in case they can be later identified for retention. Where new planting is proposed for example in car parking areas, these should be trench planted to maximise soil volumes and irrigation provided from grey water resources (roofs etc) linked with SUDS requirements. Otherwise, I am happy with the submitted Arboricultural Impact Assessment [Doc 2], that sets out details which could feature in design coding.

Thames
Water

No objections.
Waste Comments: Thames Water would advise that with regard to the FOUL WATER network capacity, we would not have any objection to the above planning application, based on the information provided.
The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Water Comments: With regard to water supply, this comes within the area covered by the South East Water Company. For your information the address to write to is - South East Water Company, Rocfort Road, Snodland, Kent, ME6 5AH, Tel: 01444-448200

SLP Project
(ESSO
Pipeline)

No objections. Esso Petroleum Co Ltd, do have apparatus situated near the proposed works. Esso Petroleum Co Ltd have no objections to the proposals so long as the enclosed 'Special Requirements for Safe Working' booklet and the covenants contained in the Deed of Grant are adhered to.
[Officer Note: these documents have been provided to the Applicants for their information and any action necessary.]

Waverley
Borough
Council

No objections subject to a full assessment of the material planning considerations and providing the proposal accords with the Local Plan and the NPPF.

Neighbours notified

In addition to posting a site notice and press advertisement, 93 individual letters of notification were sent to address points within Cody Technology Park, Farnborough Airport, Nos.128 & 130 Old Ively Road, Nos.1 & 2 Kennels Lane, and Victor Way.

The application was subject to a public consultation exercise undertaken on behalf of the Applicants prior to the application being submitted. This involved posting an information leaflet to all properties within a radius of approximately 1 mile (1.6 km) from the application site. This radius included the entirety of the Hartland Park development and south part of the Pondtail district of Fleet within Hart DC's area; together with the whole of the Southwood district and adjoining part of Ively Road in Farnborough. People were invited to a community drop-in event on 10 July 2025 at the Aviator Hotel; and comments/replies requested, whether on-line or by email, by 31 August 2025.

The Statement of Community Involvement [**Doc 23**] submitted with the application reports the comments received and the applicants' response to them. A total of 30 responses were received, 28 by e-form and 2 by email. Responses were generally positive concerning employment generation, but raised a number of generic concerns about traffic, parking, the need for better transport links, including walking and cycling routes. Environmental issues were also raised such as noise, light pollution, and sustainability featured prominently, with particular attention directed at the need to protect and upgrading the Cody Astronomical Society's observatory. Respondents also asked for clearer information on development phases, site access, and security, while encouraging the inclusion of green spaces, community facilities, and stronger public transport connections.

In addition to neighbours engaged by the postal flyer, the Applicants also contacted the following stakeholders:-

- Leader and councillors for Rushmoor Borough Council;
- Councillors for St Marks Ward, Rushmoor Borough Council;
- Councillors for Cove and Southwood Ward, Rushmoor Borough Council;
- Leader and councillors for Hart District Council;
- Councillors for Fleet East Ward, Hart District Council;
- Leader and councillors for Hampshire County Council;
- Members of Parliament for Aldershot Constituency & North East Hampshire Constituency; and
- Farnborough Airport.

Following the initial stakeholder engagement, meetings were held with Hart District Council on Wednesday 2nd July and with councillors from Rushmoor Borough Council on Thursday 10th July. During the consultation period, the Applicants received feedback from Hart District Council indicating support in principle for the proposed the investment in Cody Technology Park; and recognition of the benefits expected for Hart's economy and local employment. Hart District Council also showed support for energy-efficient buildings and cycling to work. Nevertheless, concerns were raised relating to transport impacts on the Hart DC side of the boundary [*Officer Note: which have been re-stated in Hart DC's formal consultation response to Rushmoor BC in respect of the application as set out in the preceding Consultation Responses section of this Report.*]

Neighbour Comments Received

At the time of writing this report a total of 4 representations have been received as a result of the Council's formal neighbour notification processes commenced after the application was validated : 1 in Support and 3 raising Objections, as follows:-

Group CEO, Cody Technology Park	Support Comments: The proposal will deliver much needed investment in the site and will generate economic benefits on both a local and national scale. Cody Technology Park is home to an established cluster of defence, aerospace and IT-related companies and further investment is vital given its significant contribution to the UK Defence sector at both a national and local level. As you are aware, QinetiQ has a long-established presence at Cody Technology Park and while we remain committed to the site, there is a clear need for investment in new, modern and improved accommodation and facilities. The proposed development will deliver a step change in the accommodation currently available on the site through the initial redevelopment of the Ball Hill area fronting onto Range Road. This redevelopment will greatly enhance the site's commercial offering, expand the
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availability of ancillary accommodation and improve the quality of its secure working environment. The application also includes plans for a new QinetiQ headquarters building, offering a modern and bespoke replacement for our current accommodation. This forms part of our long-term planning and demonstrates our ongoing commitment to Cody Technology Park and is therefore welcomed and supported.

The applicant has engaged positively and proactively with QinetiQ in developing these proposals which, as outlined above, are considered fundamental to the ongoing success and future growth of Cody Technology Park. We strongly encourage the Council to support the application.

130 Old Ively Rd

Objection:

- Effect upon air quality
- Loss of light
- Noise and disturbance
- Overlooking - Loss of privacy
- Traffic congestion - Highway safety;

Zone 3 states a Multistory car park will be built. Currently the car park is hardly used, causing no congestion or impact to the 2 residential houses [Nos.128 & 130 Old Ively Road] opposite Victor Way. A multi story car park suggests an increase in traffic, noise and an eyesore.

14 Wisley Gardens,
Southwood, F

Objection: I oppose this planning application as data centers currently use huge quantities of water for cooling and electricity for running servers and equipment. This land should be used for the building of housing instead of using countryside for new homes.

[Officer Note: the application site is land identified as 'countryside' and, as such, would not be suitable for residential development. The applicants have explicitly stated that the proposed 'data centres' would not abstract water for cooling purposes.]

Farnborough Airport

Objection:

Introduction: Farnborough Airport welcomes the ambition underpinning the proposed redevelopment of Cody Technology Park and recognises its potential to reinforce Farnborough's position as a hub for aerospace, defence, and advanced technologies—an ambition that aligns closely with the Airport's role as a strategic economic driver for the region. We support investment-led, high-quality growth that fosters long-term economic resilience and complements the surrounding infrastructure.

While we value constructive engagement with the developer, our overriding priority must remain the safe and secure operation of the Airport. Our customers have exceptionally high expectations, and any disruption to secure entry protocols or congestion at peak hours would not only compromise operational resilience but also erode the premium customer experience that defines Farnborough Airport's reputation.

Outline Determination: Access : We recognise that at outline stage access is the sole matter for determination. However, the way access is managed will have direct consequences for Airport operations, particularly in relation to resilience, safety, and efficiency.

The proposed reliance on Ively Gate/Ively Roundabout as a main access point for construction traffic over an eight-year period represents a critical operational risk to Farnborough Airport. This junction is our primary secure access point, and the plan does not demonstrate that it is suitable for sustained use by large construction vehicles.

Safety, capacity, and resilience issues remain unresolved.

While the developer's objective is understandably to minimise disruption on their own site, the effect is to shift disproportionate risk onto the Airport and other users of this busy junction. This undermines operational standards and exposes critical infrastructure to congestion and disruption. It is essential that site design balances internal convenience with wider operational resilience, ensuring that benefits to Cody are not achieved at the expense of safeguarding Airport operations.

The Airport opens at 07:00 on weekdays and 08:00 on weekends, with traffic flows already busy at these times. The proposed construction traffic movements — scheduled to begin from 07:30 each weekday — would therefore coincide directly with the Airport's busiest access periods, compounding congestion and increasing the risk of operational disruption. The plan does not provide clarity on how peak construction traffic will be managed to avoid clashes with Airport peak hours.

While these concerns are significant, we do acknowledge certain positive elements of the Framework Construction Traffic Management Plan. In particular, the introduction of an HGV

booking system is a welcome measure to regulate deliveries and avoid uncontrolled vehicle arrivals. The commitment to clear signage, routing instructions, and restricted working hours also demonstrates an effort to manage impacts responsibly. These measures provide a useful foundation, but they must be strengthened and adapted to ensure they do not conflict with Airport peak access periods or compromise operational resilience.

Risks of the Proposed Arrangements

- Exacerbating congestion at Ively Roundabout, undermining a key arterial route to the M3 corridor.
- Compromising secure access protocols, where delays at Ively Gate disrupt staff, passengers, and essential services.
- Creating sustained operational disruption, with Cody construction traffic overlapping with Airport apron, taxiway and runway development works scheduled between 2026 and 2030.
- Shifting risk unfairly, as Cody avoids internal disruption while the Airport absorbs externalised impacts of congestion, safety conflicts, and reduced resilience.

Lack of Adequate Assessment : We are further concerned that the Framework Construction Traffic Management Plan does not adequately assess the suitability of Ively Gate/Ively Roundabout for sustained use by large construction vehicles. The plan provides no evidence that:

- The junction geometry can safely accommodate frequent HGVs and oversized loads.
- Visibility and turning movements have been assessed to ensure safety for other road users, including cyclists and pedestrians.
- The road surface and infrastructure can withstand prolonged heavy vehicle use without degradation.
- Queuing of construction vehicles will not conflict with Airport secure access protocols.

Without such assessment, the proposed arrangements risk creating unsafe conditions, operational disruption, and long-term damage to a key arterial route.

Required Actions : We therefore urge the Council to require the applicant to reconsider access arrangements so that the majority of construction traffic avoids Farnborough Airport's operations. Alternative access points, cumulative impact assessment, contingency planning, and phasing coordination are

essential to ensure that Cody's development proceeds without compromising the safe, efficient, and premium operational environment that Farnborough Airport provides.

Access and Transport - Long-Term Arrangements : While our immediate concern relates to construction traffic, it is equally important to consider the longer-term access arrangements once the development is complete. Permanent site traffic flows from staff, visitors, and service vehicles will overlap with Airport operations, particularly at peak hours.

The Transport Assessment provides headline trip generation figures but does not demonstrate how permanent site access will be managed in coordination with Airport operations. Clarity is needed on secure access protocols, peak-hour resilience, and the cumulative impact of background traffic growth to ensure that the Airport's ability to operate safely and securely is not compromised.

Cumulative Impacts : The Environmental Impact Assessment submitted with the Cody Technology Park application does include a section on cumulative effects, but it does not adequately assess the combined impact of Cody's construction programme with Farnborough Airport's already consented apron and taxiway works. These works are scheduled to occur simultaneously between 2026 and 2030 and will add more reliance on Ively Gate/Ively Roundabout as a secure access point.

In addition, while no planning application has yet been submitted, the Airport's runway resurfacing programme is expected to fall within the same construction period as Cody. This further increases the likelihood of overlapping traffic movements and operational pressures at the Airport's primary secure access point.

This omission is critical. Without cumulative assessment, the application underestimates traffic volumes, congestion, and operational disruption. The risk is compounded by the overlap of major construction programmes, each generating significant HGV and workforce movements at peak hours.

Failure to address cumulative impacts risks:

- Escalating congestion: simultaneous construction traffic from Cody and the Airport overwhelming Ively Roundabout.
- Secure access disruption: queuing and delays undermining Airport entry protocols.
- Operational conflict: Cody traffic overlapping with apron, taxiway, and runway works, reducing resilience and efficiency.

We therefore urge the Council to require the applicant to undertake a cumulative impact assessment before outline approval is granted. This must explicitly consider the Airport's permitted apron and taxiway works, the forthcoming runway resurfacing programme, and ensure mitigation measures are coordinated so that both projects can proceed without compromising secure access, operational resilience, or customer experience.

Drainage and Flood Risk : Another consideration is the cumulative effect on Cove Brook. Additional water flows from the Vale Croft Woods (Redrow) housing development on the former Southwood Golf Course, immediately south of the Airport, already discharge through the Airport site. With further development now proposed at Cody, it is unclear what assessment has been undertaken to ensure that Cove Brook has sufficient capacity to accommodate these combined flows.

The effect of this cumulative increase does not appear to have been properly assessed, but it is entirely feasible that the Y38 system will require substantial upgrading to provide adequate capacity and resilience. Any such works must

be secured through planning conditions, with costs borne by the developer, so that the Airport and wider community are not left to absorb the expense of safeguarding against risks created by the scheme.

Reserved Matters: Safeguards Required : Although other matters are reserved, they represent foreseeable risks that must be safeguarded now through conditions attached to any outline approval.

1. Construction-phase risks :

- Water ingress during excavation: Recent experience of local construction has shown foundations filling with water due to the high water table. This raises concerns about how excavation and piling will be managed, and whether temporary drainage and de-watering measures are adequate. The developer must provide reassurance that construction activities will not cause uncontrolled flooding, increased bird activity and water ingress affecting neighbouring land, including the Airport.

- Silt contamination of Cove Brook: Construction activities risk releasing silt and sediment into surface water run-off, which could contaminate Cove Brook. This would have adverse environmental impacts and could compromise downstream drainage. A detailed surface water and silt control strategy must therefore be in place prior to breaking ground, with monitoring and enforcement secured by condition.

2. Operational/long-term risks :

- Flood risk and infiltration: The applicant's own Drainage Strategy (p.26) notes that soakaways are not appropriate. Infiltration into ground is therefore not a sufficient long-term mitigation unless supported by robust assessment. The developer must demonstrate that permanent drainage and flood defences are adequate to protect neighbouring infrastructure, with ongoing maintenance provision.

- PFAS/PFOS contamination: Given the historic use of Cody Technology Park for MOD/QinetiQ testing, there is a credible risk of legacy contamination. All discharges into neighbouring properties should be assessed for PFAS/PFOS. If levels exceed regulatory thresholds, investigations must be undertaken to identify sources and remediate accordingly. Boreholes should be subject to the same testing.

- Outfalls and separators: All water outfalls into the Airport must be connected to separators to reduce contamination risk into Cove Brook.

- Data Centres fire risk: We note that the proposals include secure data infrastructure, which carries unique fire safety challenges. We are therefore interested in how fire risk will be managed, particularly in relation to suppression systems and water control measures. A detailed Fire Risk Assessment should support this, demonstrating how risks to both data centre operations and surrounding critical infrastructure will be mitigated.

- Ponds and wildlife: Existing ponds should be incorporated into the drainage strategy.

- Wildlife management plan: A comprehensive wildlife management plan must be prepared prior to development. This should begin with ecological surveys to assess species present and determine whether relocation is required or whether alternative mitigation is more appropriate. Crucially, the plan must also assess aviation safety risks, ensuring that wildlife is not displaced or attracted onto the Airport estate. The developer must implement and maintain measures to minimise these risks throughout construction and operation.

- Foul sewer continuity: The Airport's foul sewer enters the development site before re-entering Airport land and must remain fully functional at all times. Any interruption would have immediate operational consequences and render the developer liable for all costs incurred. The 'Existing Services Plan' does

reference this network, but it is marked as draft and the extent of the pipework does not appear complete when compared with Farnborough Airport's records. The current configuration exposes a single point of failure for the Airport, which must be eliminated through a resilient design. Responsibility for delivering and funding the necessary safeguards should rest with the developer.

Security and Boundary Integration Landscaping, elevation, and boundary treatments must be designed to prevent unauthorised access and safeguard surveillance visibility. Building structures should be adequately set back from the boundary for both aesthetic and security reasons.

We ask that the applicant proactively consult with the Airport on landscaping, elevation, and boundary design to ensure that surveillance visibility, secure access, and operational resilience are maintained. Early engagement will help balance aesthetic objectives with the Airport's critical security requirements.

Aviation Safeguarding and Flight Safety : We welcome the applicant's acknowledgement of aviation safeguarding requirements, including compliance with CAA civil aerodrome safeguarding and MOD safeguarding zones that remain relevant given the site's historic and geographic context. Detailed safeguarding assessments will be required at reserved matters stage to ensure full compliance, including:

- Protection of line-of-sight and navigational infrastructure.
- Management of glint and glare from reflective surfaces.
- Adherence to height restrictions and protected airspace contours.

Landscaping, green roofs and waste management practices must be carefully evaluated to prevent increased bird activity, which could compromise flight safety.

Land Use Definition and Change of Use : The planning consent should clearly set out the intended purpose of the site, defined as, for example, "technology park and associated research and development facilities"]. Any future change of use that could overlap with or undermine Airport operations (such as customer parking, car rental, hospitality, retail parks, or distribution centres) should be reconsidered through the appropriate planning process.

Conclusion : Farnborough Airport supports the strategic ambition of the Cody Technology Park development proposals and welcomes partners with a clear focus on quality and long-term positive impact. We are committed to continuing our collaboration with the developer and Rushmoor Borough Council to ensure the redevelopment enhances the region while safeguarding the Airport's ability to operate safely, securely, and efficiently. We recognise that access is the only outline matter for determination. However, the way access is managed will have direct consequences for Airport operations, particularly in relation to resilience, safety, and the premium customer experience that defines Farnborough Airport's reputation. Other matters such as drainage, safeguarding, and environmental management are reserved, but they represent foreseeable risks. It is therefore important that suitable conditions are attached to ensure these safeguards are delivered.

[Officer Note: the applicants' agents have responded to the Farnborough Airport representations [with Doc 21] as follows:-

"It is noted that Farnborough Airport are generally supportive of the proposed redevelopment within CTP. Notwithstanding this, comments have been provided requesting reassurances in relation to highways/access; cumulative impacts; drainage and flood risk; safeguards required for reserved matters; security and boundary integration; aviation safeguarding and flight safety; and land use definition/ change of use. A response to these matters is dealt with in

turn.

Highways/Access : The Range Road/Ively Roundabout access [Access 1] is an existing access to the Site that could be brought back into use at any time irrespective of the grant of planning consent. A detailed assessment of the road network in this location has been undertaken (as set out within the Transport Assessment (September 2025) submitted with the application [Doc 25], and the subsequent Addendum (January 2026)). This confirms that the proposal would not result in a severe or unacceptable impact on the local transport networks that would potentially justify resistance to development on transport grounds, including at the Ively Roundabout.

It is noted that the Ively Road Roundabout is intended to be utilised by the Airport for construction traffic in relation to their own development proposals and as such, it is not considered tenable to question the appropriateness of this junction for use by large construction vehicles. The roundabout has been constructed to Design Manual for Roads and Bridges (DMRB) standards and is inherently capable of accommodating large vehicles without giving rise to a highway safety issue. As requested by HCC Officers, swept path analysis demonstrating how large articulated vehicles would negotiate the roundabout is included in the updated Framework Construction Traffic Management Plan (January 2026) submitted to the Council on 27 January 2026 [Doc13] , which confirms that these vehicles can safely and efficiently access the Site. The Ively Road roundabout is considered to represent a safer access point compared to the alternatives, which would otherwise require all construction traffic to be routed via the operational campus where the propensity for a conflict between pedestrians and vehicles will be greater.

It is proposed that a development-specific Construction Transport Management Plan (CTMP) will be submitted to the Council for approval prior to the commencement of each phase of development (or part thereof). This will need to align with the Framework CTMP (updated January 2026) and provides an opportunity to consult with Farnborough Airport to ensure any disruption associated with construction traffic is appropriately managed. A restriction on deliveries (both HGVs and LGVs) is incorporated within the Framework CTMP, alongside a number of other measures which we note Farnborough Airport are in general support of. Development specific CTMPs will ensure that the proposed measures can be tailored to specific circumstances to ensure effectiveness, including having regard to any parallel works being undertaken at the Airport.

The modelling presented both in the Transport Assessment (September 2025) [Doc 25] and the sensitivity test modelling provided in the Transport Assessment Addendum (January 2026) [Doc 26] demonstrates that the severe operational impacts referred to in the NPPF as reasonable grounds to resist development would not occur. In the worst-case scenario, where unconstrained traffic growth occurs, minor additional mitigation works would be required, with a suitable scheme and delivery mechanism having been identified.

The Applicant has agreed in principle to a condition requiring an Operational Management Plan (OMP) to be implemented. Amongst others, the OMP will include measures to:

- Minimise peak hour traffic impacts, particularly those associated with HGVs;

- *Manage on-site parking and servicing; and,*
 - *Manage pedestrian and cycle movement with and adjacent to the Site.*
- With respect to secure access protocols, it is intended that technological solutions will be implemented to ease potential friction at the site entry points. It is noted that the secure boundary on Range Road is approximately 160 metres south-west of the Airport access junction. It is therefore highly unlikely that any vehicles waiting to enter the site would in any way impact on the Airport's operations.*

Cumulative Impacts : *We are aware of the Airport's proposals to increase hardstanding as part of the apron and taxiway works, consented in 2023. However, despite the proximity to the Site, these proposals were not considered substantive enough to warrant inclusion as part of the cumulative assessment within the ES. Where information is available in respect of these proposals, it is noted that there will be no increase in operational traffic and construction traffic is anticipated 'to be minimal and will be managed through the Construction Environmental Management Plan'.*

In terms of other potential environmental and ecological impacts (e.g. on the Airport SINC and Cove Brook), these will be suitably mitigated with conditions in place to secure such mitigation. Therefore, changes to the cumulative effects identified within the ES are not anticipated. It is also noted that neither of these proposals have been identified for inclusion within the Airport's own cumulative assessment within the ES's submitted pursuant to Ref: 23/00794/REVPP or Ref: 25/00615/REV. Having regard to the above, it is not considered that the inclusion of these development proposals within the cumulative assessment would materially alter the outcome of the ES assessment. No update to the ES is therefore considered necessary.

Drainage and Flood Risk : *As detailed within the submitted Flood Risk Assessment (September 2025) [Doc 12], the drainage strategy confirmed that discharge from the Site will be restricted to greenfield (Qbar) rates, utilising a combination of on-site attenuation and SuDS. Currently the Site drains to Cove Brook in an uncontrolled manner and there are little to no SuDS or other water control or treatment. As such, the Proposed Development will not increase peak flows to Cove Brook and will actually deliver a betterment compared to the existing situation. On this basis, there is no reliance on Cove Brook having additional space capacity, and no requirement to assess or model cumulative third-party development flows where each scheme adheres to policy-compliant discharge controls. This approach has been accepted by both the LLFA and Environment Agency.*

Reserved Matters: Safeguards Required : *It is considered that the comments raised in relation to Construction Phase risks can be adequately managed via the implementation of CEMPs. In terms of the operational risks identified, these are matters which can be appropriately addressed at reserved matters stage once the detailed proposals are known.*

Security and Boundary Integration : *We acknowledge the Airport's concerns in relation to security and boundary treatment and indeed, as a secure site, share the importance of maintaining a high level of security. To provide additional reassurance, we have amended Character Area 4 within the Design Code (January 2026) [Doc 8] to relate specifically to Airport Boundary Screening. This includes mandatory codes to ensure a consistent approach is*

*taken to planting
along this boundary, noting the Airport's concerns.*

Aviation safeguarding and Flight Safety : *It is noted that the Airport's Safeguarding Officer confirmed no objection to the application and that the additional comments provided by the Airport as adjacent landowner also confirm support for further consideration to be given to aviation safety and safeguarding at the reserved matters stage, as set out within the application. There are also requirements within the Design Code which will manage proposed landscaping, green roofs and waste management having regard to the Airport's concerns regarding increased bird activity.*

Land Use Definition and Change of Use : *As noted within the Airport's response, any alternative uses to those proposed under the outline application would require planning permission."]*

Planning Policy

The red-lined application site is, with the sole exception of the existing roadway leading up to the Ively Roundabout shared with Farnborough Airport at Access 1, identified by the Proposals Map for the adopted Rushmoor Local Plan (2014-2032) as 'Countryside' and as a Strategic Employment Area. Cove Brook is near the south-east boundary of the Ball Hill portion of the application site and is identified as a 'Green Corridor'. Land outside the site near the Ively Roundabout is identified as a fluvial 'flood zone' also associated with Cove Brook. To the north of the Ball Hill portion of the site and to the east of CTP South is land designated as the Ball Hill Site of Importance for Nature Conservation (SINC). Land south of mainly the CTP South portion of the application site is variously designated as comprising part of the Eelmoor Marsh Site of Special Scientific Interest (SSSI) and, thereby, also a component part of the Thames Basin Heaths Special Protection Area (SPA). A section of Eelmoor Marsh located centrally south of CTP South is also separately a SINC. Portions of the Farnborough Airport SINC adjoin the application site to the south-east; and the nearest part of the Basingstoke Canal SSSI is situated approximately 500 metres west of the application site.

Accordingly, adopted Local Plan Policies SS1(Presumption in Favour of Sustainable Development), SS2 (Spatial Strategy), IN1 (Infrastructure), IN2 (Transport), IN3 (Telecommunications), HE4 (Archaeology), DE1 (Design in the Built Environment), DE4 (Sustainable Water Use), DE10 (Pollution), PC1 (Economic Growth & Investment), PC2 (Strategic Employment Sites), PC5 (Cody Technology Park), PC8 (Skills, Training & Employment), NE1 (Thames Basin Heaths Special Protection Area), NE2 (Green Infrastructure – including 'Green Corridors'), NE3 (Trees & Landscaping), NE4 (Biodiversity), NE5 (Countryside), NE6 (Managing Fluvial Flood Risk), NE7 (Areas at Risk of Surface Water Flooding), and NE8 (Sustainable Drainage Systems) are relevant.

Policy PC2 (Strategic Employment Sites) in conjunction with the Local Plan Proposals Map identifies CTP and the adjacent land at Ball Hill as a Strategic Employment Site; wherein, where possible and appropriate, the redevelopment and regeneration of these sites will be supported to provide B-class employment floorspace that meets the needs of the market. The policy also makes an allowance for small-scale proposals for non B-class uses where they would provide complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site.

Local Plan Policy PC5 (Cody Technology Park) is clearly directly and highly relevant to the consideration of the current planning application and seeks to protect the land identified as the Strategic Employment Site there for specified business uses. The policy states:-

“Land at Cody Technology Park will be protected for business use comprising offices, research, test evaluation and light-industrial processes falling with use classes B1(a), (b) and (c) [Offices, research & development and light industrial uses] of the Town and Country Planning (Use Classes) Order 1987 (as amended), furthering the secure research and development, and high capacity communications and energy infrastructure, provided at the site. Development in accordance with the Deed dated 17 January 1995 and the Certificate of Lawful Use dated 12 January 2005 will be supported. Where any proposals for development are submitted which exceed or fall outside these established development rights, the following criteria will be relevant to their determination:

- a. That the need for such proposals in this location is demonstrated;***
- b. That the economic benefits to the local and wider economy can be demonstrated;***
- c. That any proposals can be appropriately screened to minimise their visual impact;***
- and***
- d. That any impacts on the local highway network are appropriately mitigated.”***

In this respect, the ‘Deed’ that is referred to in this policy is the 1995 s299A Agreement imposing conditions in respect of the original Defence Research Agency development creating CTP South in the mid-1990s : see **Relevant Planning History** section of this Report. The 2005 Certificate of Lawful Use established that the lawful use of CTP South falls within Use Class B1.

Also relevant are the Councils adopted Supplementary Planning Documents (SPDs) Car and Cycle Standards (March 2024) and Biodiversity Net Gain (April 2024).

The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) are also relevant. The NPPF *“represents up-to-date government planning policy and is a material consideration that must be taken into account where it is relevant to a planning application or appeal. This includes the presumption in favour of development found at paragraph 14 of the Framework. If decision takers choose not to follow the National Planning Policy Framework, where it is a material consideration, clear and convincing reasons for doing so are needed.”*

Where planning policies conflict with each other, which is more likely with complex large proposals such as that the subject of the current application, s38(5) of the Planning and Compulsory Purchase Act 2004 states that, if a policy contained in a Development Plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last development plan document to be adopted, approved or published. Conflicts between development plan policies adopted, approved or published at the same time must be considered in the light of all material considerations, including local priorities and needs, as guided by the National Planning Policy Framework. In this respect, it is necessary for the Council to consider and attach weight to the various planning issues and decide which issues over-ride other issues in the balance of consideration of the proposals in order to make a decision on the application.

Public Sector Equality Duty (PSED) : s149 of the Equality Act 2010 requires all public authorities to *“have due regard to”* (a) the need to eliminate discrimination, harassment and victimisation; (b) advance equality of opportunity; and (c) foster good relations between people with protected characteristics and those without as an essential element of their decision-making, which includes the consideration and determination of Planning Applications. ‘Protected characteristics’ are: age, disability, gender re-assignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex and sexual orientation. In the context of the current outline planning application it is considered that the primary PSED consideration that is

identified is the need to have due regard to access for people with disabilities within the proposed development. Whilst sex, sexual orientation and gender re-assignment could potentially have implications for the provision of appropriate toilet and changing facilities within the proposed development these are not determining issues for planning applications since they are internal details not subject to planning control, but also, even more fundamentally, because the current application is expressed in outline form where the design of the proposed buildings and external spaces is to be subject to future Reserved matters submissions. In this context it is considered that the detailed internal arrangements for toilet and changing facilities within the proposed development would not be prejudiced by the granting of outline planning permission because flexibility in the internal layout of the proposed floorspace remains and is, indeed, for future consideration at Reserved Matters stage.

Officer Note: An Outline planning application submits proposals in abbreviated form seeking consent in principle to a limited range of aspects of those proposals.

This form of application is normally only used for larger or more unusual development proposals. Outline applications are a preliminary planning application option provided within the planning legislation to enable developers to find out if there are any issues of principle and basic detail to resolve before they get too far into planning the details of their proposals.

If Outline planning permission is granted this does not act as consent for development to begin. Once outline planning permission has been granted, one or more 'Reserved Matters' applications must then be made in order to complete approval for the development proposals at the level of detail that is expected with a conventional fully-detailed planning application.

The details contained with Reserved Matters application must be consistent with those of the parent outline approval, including any conditions that are attached to it.

Determining Issues

Applications for outline planning permission allow developers to seek to establish whether the overall scale and nature of a proposed development presented in outline form would be acceptable before fully detailed proposals are put forward. Granting an Outline planning permission gives consent in principle for a proposed development and requires the later submission of Reserved Matters applications to complete the specifics and level of detail needed for the overall planning consent to be equivalent to a fully-detailed planning approval.

In determining an Outline Planning Application, the Local Planning Authority must consider whether those limited plans, details and other matters on which the outline planning permission is being sought provide a credible framework for an acceptable development to be realised. In this respect, the Local Planning Authority must do so by considering whether and what planning conditions are necessary to shape and control the eventual development and to inform the subsequent Reserved Matters submissions. Various enforceable controls can be imposed in this respect using Planning Conditions and clauses in a s106 Legal Agreement to ensure that the subsequent Reserved Matters will be of an acceptable quality and result in good development in detail at a later stage.

Development cannot commence until Reserved Matters approval has been obtained and it is possible for the Council as Local Planning Authority to refuse Reserved Matters applications should it be considered that the detailed proposals that they put forward are unacceptable by

not following the principles already established at the Outline planning permission stage; or by not meeting the expectations established for the design quality of the proposed development at the Outline stage.

For larger or more complex developments, such as the current application proposals, it is usual for Reserved Matters applications to be submitted in phases reflecting the long period of time over which larger-scale developments are likely to be implemented. In this case the Applicants currently indicate that the first phase of the proposed development under the outline planning permission (if granted) could commence in 2024 with an expected completion date for the whole development taking until at least the end of 2034, a period of 9 years, but possibly longer. Indeed, the Applicants have requested that the planning permission be granted with a time period for implementation of 15 years to allow flexibility in this respect.

Whilst focus is usually placed on considering planning proposals in detail and, indeed, to be concerned about the absence of the details usually submitted with conventional detailed planning applications, it is necessary for the Council to consider outline planning applications solely on the basis of what has been submitted for determination. The Council must consider whether the more limited plans and details submitted for determination, in this case the Parameter Plans under the application description, and with the means of access to the proposed development only being considered for determination at this stage, together with the Design Code document (January 2026) **[Doc 8]**, collectively describe a credible and acceptable framework for the proposed development of the application site in principle.

In the above context, it is considered that the main determining issues are as follows:-

1. Principle : : Regeneration Objectives & Policy Compliance;
2. Environmental Impact Assessment;
3. Environmental Considerations : Ground Contamination, Air Quality, Noise, Water Quality, & Climate Change;
4. Quantum of Development;
5. Design;
6. Landscape & Visual Impact;
7. Heritage Impact;
8. Trees;
9. Impacts on Neighbours;
10. Highways Considerations : Proposed Means of Access, Traffic Impact, Parking, Active Travel;
11. Impacts on Wildlife & Ecology/Biodiversity Net Gain;
12. Flood Risk & Drainage;
13. Other Issues : Sustainability, Access for People with Disabilities, & Phasing.

1. Principle –

National Policy Context : The National Planning Policy Framework (NPPF) advises that the purpose of the planning system is to contribute to the achievement of sustainable development. In this respect, there are three dimensions to sustainable development: economic, social and environmental. These roles are defined as:-

- *"contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and co-ordinating development requirements including the provision of infrastructure;*
- *supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*

The NPPF advises that these roles should not be taken in isolation because they are mutually dependent, and the planning system should play an active role in guiding development to sustainable locations.

Under the title "*Building a strong, competitive economy*" NPPF Para.85 encourages decisions to help create the conditions in which businesses can invest, expand and adapt and "*.....significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*".

Data Centres : The Applicants have clarified that all of DZs 2 & 4 are proposed to be data centres rather than being a mix of data centres and general B8 (Storage & Distribution) uses – and a condition is invited to restrict the uses within DZs 2 & 4 solely to being data centres and their ancillary equipment and installations. A 'data centre' is currently considered to be a use of land falling within Use Class B8 and comprises a physical structure that includes a data hall for housing, connecting, and operating IT equipment. They are associated with ancillary supporting infrastructure including electrical supply systems, environmental control (such as heating, cooling, ventilation and air-conditioning; and dust, humidity and flame control); and security and resilience systems, most notably including back-up electricity supply capacity with generators and/or batteries. Data centres are typically sited within security-cordoned sites.

In September 2024, the Government designated data centres as Critical National Infrastructure, which gave data centres the benefit of additional cyber security support, underscoring their importance to National economic resilience. The Government has also confirmed that large-scale data centres (defined by their rated IT load [RITL] rather than their physical size) have been added to the list of Nationally Significant Infrastructure Projects (NSIPs) meaning that they can, alternatively, be developed under a Development Consent Order (DCO) should a developer wish. A DCO is a streamlined consent process under the Planning Act 2008, designed for major infrastructure projects.

Unlike seeking traditional planning permissions, which are determined by Local Authorities, DCOs are determined by the Secretary of State following a public examination. However, in this instance the Applicants have opted to seek planning permission from Rushmoor BC, the Local Planning Authority, instead.

Further emphasising the national importance of data centres and digital infrastructure, the current version of the NPPF (December 2024), at Para.87, requires planning policies to consider the economic need for data centres and digital infrastructure and to take into account their specific locational needs. This includes making provision for:-

- clusters or networks of knowledge and data-driven, creative or high technology industries and infrastructure that are needed to support the growth of these industries (**including data centres** and grid connections);
- storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and
- the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

Accordingly, it is considered that the inclusion of proposals for data centres within the application clearly accords with current Government planning policy.

Efficient Use of Land : The proposed development is seeking to make more efficient use of previously-developed land. NPPF Para.124 encourages decisions which promote the effective use of land and Para.125c) calls for substantial weight to be given to the value of using suitable brownfield land within settlements to meet identified needs: “proposals for which should be approved unless substantial harm would be caused”.

Within reason the regeneration of such land, is a clear objective of both Government planning guidance and local planning policy.

Policy SS1 (Presumption in Favour of Sustainable Development) establishes the principle that, in considering the merits of planning proposals, the Council “*will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF....*” And “*Planning applications that accord with the policies in the Rushmoor Local Plan.....will be approved without delay, unless material considerations indicate otherwise.*”

Accordingly, the proposals are also considered acceptable in basic principle having regard to the Council’s adopted Planning policies and Government Planning Policy & Guidance.

Proposed Uses : The Rushmoor Local Plan does not exist in a vacuum and, like any planning policy document it is inevitable, with time, that it would, in some respects, become out-dated by subsequent events, most notably changes in Planning legislation. Whilst the Local Plan considers the protection and retention of Strategic Employment Sites for traditional B-class employment uses (i.e. B1, B2 & B8 uses) to be critical to the economy of Rushmoor, Local Plan Policies PC1 and PC2 predate the coming into effect of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations

2020. This made significant changes to the Town and Country Planning (Use Classes) Order 1987 by re-classifying certain uses of property and land, including the incorporation of the former B1 business employment Use Class (comprising office, research & development and light industrial uses) within a broader commercial, business and service use (Use Class E : Commercial, Business & Service). The advent of Use Class E means that references to the affected former B-Class uses within pre-2020 planning policies such as Local Plan Policies PC1 & PC2 must now be considered to include Class E(g) (i)-(iii) uses; i.e. the equivalent Use Class designations for office, research & development and light industrial uses now included within Use Class E. It must also be noted that, for the purposes of Policies PC1 & PC2, "B-Class employment uses" continue to include both B2 (general industrial) and B8 (storage & distribution) uses, which have remained unaffected by the 2020 changes to the Use Classes Order. On this basis it is considered that the current application proposals do not conflict with Local Plan Policies PC1 & PC2 since the proposed uses are considered to correspond with those uses that these policies indicate are appropriate within Strategic Employment Sites.

However, it is noted that the s299A Agreement specifying the original implemented and built-out 1995 planning consent for the DRA development is subject, at the Fourth Schedule, to Condition No.4. This condition firstly specifies a maximum quantum of floorspace (106,572 sqm) for the CTP South and the X & Ball Hill Sites, which appears to simply reflect the maximum quantum of existing and proposed floorspace that has arisen as a result of the DRA re-location proposals; amounting to the existing floorspace minus demolitions plus proposed new floorspace. No Planning reason or justification for the floorspace limitation is specified within the s299A Agreement.

Secondly, Condition No.4 also restricts the uses that were permitted to being "*high-technology and/or light industrial uses within Class B1(b) and (c) of the Town and Country Planning (Use Classes Order 1987 including ancillary office and storage*" thereby apparently excluding primary Use Class B1(a) office uses from the mix of uses, albeit office uses were clearly expected to exist within CTP on an ancillary basis. No reason is specified for why office use (as a primary use rather than being ancillary) was excluded with Condition No.4. Nonetheless, the January 2005 Certificate of Existing Lawful Use (04/01001/EDC) confirmed that the lawful use of CTP South and the X & Ball Hill Site was for "*business use (Use Class B1) comprising offices, research, test evaluation and light industrial processes together with ancillary uses...*" on the basis that all B1 uses had, in any event, at that time existed within the DRA site for in excess of 10 years.

The Applicants have indicated that it would be necessary to extinguish the 1995 s299A Agreement on the basis that the development to which it relates has long since been completed. In particular, it is considered that it would be necessary to delete Condition No.4 to reflect the current proposed flexible mix of uses for the application site and, in doing so, to also reflect the mix of uses including office use, now Use Class E(g) (i), that is proposed with the current application. The Applicants' suggested mechanism to make this change is either through clauses to be inserted into the s106 Agreement required in respect of the current application, or the use of a separate Deed of Variation of the original s299A Agreement. In principle this is considered that either mechanism would be an acceptable approach.

Many of the provisions of the s299A Agreement can now be considered to be spent : as a notable example, the s299A Agreement refers to “Remaining Land” then, in 1995, within the ownership of the MoD that has since been sold into private ownership comprising Farnborough Airport, Farnborough Business Park and the adjacent Redrow housing development. Additionally, it is considered that a number of the Third Schedule Obligations and Fourth Schedule Conditions imposed in respect of the DRA development are not considered to retain any useful Planning purpose : most are considered to either be spent or did not impose any enforceable on-going obligations or requirements. However, notable exceptions are Third Schedule Obligations Nos.1, which has secured the retention, management and maintenance of the Eelmoor Marsh SSSI; and No.2 that requires the on-going retention, repair and maintenance of the replica Cody Tree monument in a good condition. Fourth Schedule Condition No.4 is the use restriction already mentioned; but further Fourth Schedule Conditions that also remain effective are:- No.7 a prohibition on further plant tank rooms or other structures on the roof of any building; No.8 requiring no outside storage of goods, plant and equipment other than within the buildings or in areas that are agreed by the Council to be used for such purposes; No.11 retention of parking and service areas solely for these purposes; and No.12 the retention of Structures Gate and Ively Gate to be used only by emergency vehicles and otherwise kept locked. Accordingly, whilst it is considered appropriate in principle to use the s106 to extinguish the s299A Agreement, there are, therefore, clearly some elements of the Obligations and Conditions of the s299A Agreement that either need to be retained in a remnant s299A Agreement or replicated and/or amended by the s106. The following table summarises the recommended actions in this respect:-

1995 s299A Legal Agreement : Recommended Actions			
Obligation		Description	Recommended Action(s)
Schedule 2	Part 1		Extinguish.
“ ”	Part 2		Continue.
Schedule 3	Para.1	Retention, management and maintenance Eelmoor Marsh SSSI	Continue.
“ ”	Para.2	Replica Cody Tree Monument	Continue Obligation to retain, repair and maintain monument in its current position; but Extinguish re-location requirement, which related to the placing of the monument in its current position at CTP South.
“ ”	Para.3	Construction Traffic Access for 1995 development	Obligation spent, so Extinguish.
“ ”	Para.4	Notification of 1995 owners of ‘Remaining Land’.	Obligation spent, so Extinguish.
Schedule 4	-	Spent DRA Conditions : 1. 3, 4, 5, 6, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21 & 22.	Extinguish.
“ ”	-	Extant DRA Conditions : 7 (further roof plant), 8 (external storage) & 11(retention of parking)	Continue : to bind CTP South land, but only where this is land situated outside the current red-lined application site.

Countryside (Policy NE5) : Whilst the application site is identified by the Local Plan Proposals Map as being almost completely land that is Strategic Employment Site where Local Plan Policies PC1, PC2 and PC5 are applicable, it is also entirely identified as 'Countryside' where Local Plan Policy NE5 applies. However, the application site is a security-cordoned commercial site of mostly existing or previously-developed land of long standing that has contained significant permanent employment development authorised with planning consent since 1995. The continued identification of the application site as 'countryside' arises from the previous designation of a broad area of land between Farnborough and Fleet/Church Crookham, including the application site, as 'strategic gap' prior to the approval of the DRA development in 1995, which was justified as an 'exceptional circumstance' and approved as a departure from the then Local Plan. In the circumstances, it is considered that the Strategic Employment Site planning policy designation of the application site must now take primacy over the countryside policy. In any event, given the long-standing permanent development of the land, its relatively isolated position with swathes of countryside surrounding, together with the enclosure of the entire site, it is considered the proposed development would be appropriate in principal in terms of sustainability, leaving consideration of the proposals having regard to Policy NE5 in respect of criteria b. and c : whether or not the proposals would preserve the character and appearance of the countryside; and not lead to harmful physical or visual coalescence between surrounding built-up areas. These matters are considered in the **Landscape & Visual Impact** section later in this report.

Conclusions on matters of Principle: In the circumstances, it is considered that the proposals are acceptable in general principle.

2. Environmental Impact Assessment -

The Council's evaluation of the Environmental Statement (ES) [**Docs ES1 to ES4.40 inclusive**] is attached at the end of this Report at **Appendix 2**. It is considered that the ES remains relevant and appropriate to the development proposals as corrected and clarified; and that the submitted ES satisfactorily passes the two tests required by the relevant EIA legislation. The conclusion in the light of the evaluation is that, subject to the delivery of mitigation and other measures through conditions and/or a s106 Agreement, the development would not give rise to significant or harmful environmental consequences. The recommendations for mitigation and other measures in this respect are incorporated into proposed conditions and aspects of the s106 heads of agreement and, also, additionally in respect of design and design-quality matters, a Design Code document [**Doc 8**].

3. Environmental Considerations -

Local Plan Policy DE10 states that: *"Development will be permitted provided that:-*

- 1. It does not give rise to, or would be subject to , unacceptable levels of pollution; and*
- 2. It is satisfactorily demonstrated that any adverse impacts of pollution, either arising from the proposed development or impacting on proposed sensitive development or the natural environment will be adequately mitigated or otherwise minimised to an acceptable level."*

The assessment of impacts in the light of this policy is limited by the fact that the application is submitted in outline form, with detailed designs to be submitted at a later date as Reserved matters applications. As such, there is only an indicative layout in place at this stage and the Council's consideration of these matters must be high-level and theoretical. The following paragraphs in this section of the Report consider the principal potential pollution effects of the proposed development identified in the assessment of the current planning application, as follows:-

Ground Contamination : Land contamination is a material planning consideration because it can harm human health, soils, ecosystems, property, drinking waters supplies, groundwater and surface water etc. Without appropriate remediation of contaminated land it may not be suitable for development. In considering planning proposals, Local Planning Authorities must ensure that the development site is suitable for its proposed use, considering any risks from contamination and any proposed or required land remediation. In this respect planning applications should be supported by adequate site investigation information prepared by competent persons. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990, which is the approach supported by Para.196 of the NPPF.

The planning application has been accompanied within the ES by a desk-top Preliminary Risk Assessment (PRA) [**Docs ES2.12 and ES4.40**]. The key impacts of the proposed development that are considered potentially significant in terms of ground conditions and contamination are:-

- Potential contamination of surface water, groundwater (there is an underlying Secondary A Aquifer) and soils from historical MoD/defence uses of parts of the site;
- Potential for construction/demolition workers to be exposed to ground contamination from historic MoD/defence uses; and
- Potential for contamination to be mobilised to affect the adjacent Eelmoor Marsh SSSI/TBHSPA and watercourses downstream (i.e. Cove Brook) either as a result of the demolition and construction phases of the development, but also activities being undertaken on-site by occupiers of the proposed development when operational.

Both DZ3 & 4 have already been subject to relatively recent comprehensive development such that it is likely that any ground contamination within these areas was identified and eradicated or neutralised during the construction of the DRA development in the mid-1990s. However, it is noted that the available site investigation information from the 1990s DRA development is incomplete. Additionally, in any event, DZs 1 & 2 have been subject to more sporadic and ad hoc development over many years pre-dating modern practices of assessment and dealing with ground contamination, such that it is considered that there is greater potential for ground contamination to remain and require handling there. The current or previous use(s) of the development site relating to the Royal Aircraft Establishment and DRA, including a nearby former aircraft disposal ground, bomb dump, gun range, explosives and chemical and hazardous material storage suggests that the land at the application site, especially with DZs 1&2 is, or may be, affected by historical ground contamination.

The Environment Agency (EA) has, accordingly, raised concerns that ground contamination could, if it exists, present a risk of contamination being mobilised and

disturbed as a result of site works and construction, potentially leading to pollution of the water environment and, in particular, controlled waters. These are particularly sensitive in this location because the proposed development site is located upon a Secondary A Aquifer and close to Eelmoor Marsh, which feeds into Cove Brook.

Given the nature and limitations of both desk-top assessments (such as ambiguous or incomplete historical information) ground sampling, and the variability of groundwater conditions seasonally, it is acknowledged that a number of assumptions have had to be made to enable an assessment to be undertaken and, indeed, this situation is not unusual. However, it is considered that there is nothing to suggest that any ground contamination cannot be adequately addressed with the proposed development. Accordingly, the EA has raised no objections to the proposed development subject to the imposition of conditions requiring the submission and validation of a detailed land contamination management strategy for suspected contamination during the enabling, construction and/or development works; and also an unforeseen contamination condition. These are similar in wording and intent to the Council's own standard site investigation conditions to the same effect. The Council's Environmental Health Team are also content for conditions to be imposed to require the necessary intrusive on-site ground investigations and any appropriate remedial action that may be required to be undertaken within Development Plots at the Reserved Matters stage as they come forward.

Once the proposed development is operational it is considered that the risk of exposure to ground contamination would be much reduced, if not eliminated, due to the implementation of various mitigation and avoidance measures that would be incorporated into the development at Reserved Matters stage. The proposed development is not a residential development where people would be likely to come into prolonged/significant or any contact with the ground and, further, it is to be expected that any potential pathways for contaminants would have been cut in order to isolate them from the water environment during construction.

The Council's Ecology Officer is also satisfied that appropriate conditions can be imposed to ensure that the adjoining nature conservation sites are not adversely affected by mobilisation of pollutants during demolition and construction, and also during the operational usage of the proposed development.

Air Quality : The NPPF states that planning decisions should take account of Air Quality Management Areas (AQMA); and the cumulative impacts from individual sites. Furthermore, opportunities to improve air quality or mitigate impacts should be identified.

The application site does not fall within an AQMA and, indeed, there are none located within Rushmoor's area. Regular air quality monitoring across the Borough demonstrates that the air quality within Rushmoor consistently sits well within the limits of the National Air Quality Standards set by the Government.

An Air Quality Assessment [**Docs ES2.8 and ES4.9-ES4.14 inclusive**] has been submitted with the application as part of the ES that considers the likely impacts on air quality for both the construction and operational stages of the proposed development. During the construction phases of the development this would arise from construction activity itself in terms of both dust and fumes from plant and machinery operating at the

site; but also from the traffic associated with demolition and construction activity. Once elements of the proposed development are operational, air-quality would be affected by traffic associated with occupiers/users of, and visitors to, the proposed development travelling to and from the development, but possibly also the operational use of the proposed development itself by its occupiers.

In these respects, and in the context of the existing good air quality in the Borough, the ES has concluded that air quality impacts arising in isolation from traffic, whether construction or operational and individually or cumulatively, would not be significantly and adversely affected. It is also concluded that dust and other emissions during the demolition and construction periods of the development, which would be temporary effects, can be satisfactorily controlled, mitigated and minimised through the operation of appropriate control measures within a Construction & Environmental Management Plan (CEMP). Plant and equipment used within the operational development, including the operational management of service yards, would also be subject to assessment and consideration at Reserved Matters stage - and the possible imposition of further conditions if necessary at that stage in response to any specific issues that may then be raised. Officers are satisfied that these measures will suitably limit dust and other pollution during the construction and operational phases of the proposed development, thereby maintaining adequate air quality.

Operation of Data Centres : However, the Review of the ES and the consultation responses of the Council's Environmental Health Officer in terms of possible air quality impacts has focused particular attention on potential significant air quality impacts that could arise from the operation of the proposed data centres - when these are considered in combination with other modelled air quality impacts as a worst-case. This is specifically because data centres rely on a significant amount of electrical power for their daily operation and it is crucial that this power supply remains secure and uninterrupted at all times. The electrical supply required for the proposed data centres would be provided via the National Grid. However, in the unlikely event of any failure or outage in this power supply, a backup local power source would need to be brought into operation. In this respect, theoretically for the purposes of the ES, the Applicants have assumed that up to approximately 80 back-up diesel generators may be required with the proposed development as a potential worst-case. Whilst it is considered an unlikely scenario that there would be regular, or even at all, any significant power outages, any back-up generators would still have to undergo regular periodic testing and preventative maintenance for resilience insurance purposes - and this element of the operation of data centres has the potential to impact adversely on air quality in combination with other atmospheric emissions (i.e. road traffic) associated with the operation of the proposed development.

The development of data centres is a burgeoning area of critical national infrastructure provision required to support the maintenance and growth of the UK digital economy - and power supply security and resilience measures and their potential consequences and impacts are an integral part of the consideration of such developments nationwide. It is, however, important to consider and note that, as the Applicants are also well aware, there are other potential means of providing emergency back-up power for data centres, such as use of battery systems; and that new forms of power supply resilience and back-up systems may well emerge over time that could affect the nature of the final designs

and specification for the proposed data centres to be submitted for consideration at Reserved Matters stage.

In this context it is noted by the Council's Environmental Health Team that the Environment Agency (EA) administers a licensing/permit regime for the installation and operation diesel generators. This is an entirely separate matter to the planning process. Presumably for this reason, the EA has not raised any objections with regards to air quality in respect of the current planning application - because it is a matter that the EA themselves have regulatory control over. Nevertheless, Environmental Health recommend the imposition of conditions to (a) restrict the use of the proposed backup generators to emergency backup power supply and testing/ maintenance; and (b) to establish measures to manage and co-ordinate the maintenance/testing regime to be operated for any diesel back-up to ensure that these are undertaken on a rotating basis across the development in order that there are no times when significant generator testing activity is unduly concentrated within the development as a whole.

Subject to the imposition of appropriately-worded conditions it is considered that this provides an appropriate basis for addressing the human air quality impacts of the proposed development at the Reserved Matters stage. The air quality impacts of the proposed development are also considered later in this Report with respect to the ecological interest and integrity of adjoining and nearby nature conservation sites.

Noise/Vibration : Noise and vibration effects were scoped into the ES and some potentially significant effects may arise during the demolition/construction and operational phases of the proposed development unless this is adequately mitigated. This is covered in ES Chapter 9 [**Docs ES2.9 and ES4.15-ES4.20 inclusive**] and considers cumulative effects primarily in respect of the operations of Farnborough Airport in Chapter 13 [**Doc ES2.13**]. The Council's Environmental Health Team were consulted on the submitted details and have provided comments.

The proposed development is situated in a relatively isolated position such that human noise and vibration nuisance impacts arising from demolition/construction and the development once operational are considered to be limited to occupiers of the remainder of CTP South and the occupiers of a small number of residential properties located in the vicinity of the site, namely the occupiers of Nos.128 &130 Old Ively Road and Nos.1 & 2 Pear Tree Cottages. In this respect, a number of effects are not considered to be significant, including noise and vibration from construction activities; construction and operational road traffic noise; noise affecting the site; and vibration affecting the site and vibration from operation of the proposed scheme.

Furthermore, planning permission could not be refused on the basis of demolition/construction phase noise impacts, which are by their nature a temporary impact and, indeed, it is long-standing Government guidance that these matters are not taken into material account in the consideration of planning applications. It is considered that mitigation measures would, in any event, minimise any noise and vibration issues given the degree of separation from the neighbouring residential properties. Neighbours comprising the occupiers of existing commercial premises within CTP South to be retained, although situated closer to the proposed development plots, by their nature do not require consideration of noise impacts to the same degree. Nonetheless, it is considered that noise impacts upon human neighbours can be acceptably and

adequately dealt with by imposition of standard conditions, principally in the form of requiring the production and implementation of a Construction and Environmental Management Plan (CEMP) setting out, inter alia, measures to be taken to eliminate or at least mitigate and reduce noise emissions during the demolition and construction phases to be considered in detail at the Reserved Matters stage.

Noise (and much less likely, vibration) nuisance affecting humans arising from the proposed development once operational is not considered likely to be significant in the context of existing continuing noise sources. Indeed, increases in operational phase road traffic noise are considered unlikely to be particularly noticeable given the historically more intensive use of CTP South pre-Covid, and that the surrounding roads already carry significant road traffic past the site travelling between Farnborough and Fleet. Whilst the majority of employees are likely to drive to the site this would primarily arise during rush hours; and cycle access to the site and bicycle parking would continue to be provided and enhanced. Enhanced shuttle bus services and facilities are also proposed to improve and enable better access to the site via mass transport; and pedestrian and cycle access would also be retained and be enhanced. Furthermore, other potential sources of noise from the operational development, such as the management/operation of service yards and the running of plant and equipment (including back-up generators required by the proposed data centres) can be considered once full details of the proposed development come forward at Reserved Matters stage. Subject to appropriate conditions being imposed to apply controls in these respects it is considered that human noise nuisance impacts would be adequately addressed.

The impacts of noise on the nature conservation interests and integrity of adjoining and nearby nature conservation sites are considered separately later in this Report in the Ecology section.

Water Quality : The proposed development is situated in relative proximity to the water environment at the adjoining Eelmoor Marsh, which feeds into Cove Brook. Accordingly, in particular, the ES process has identified the potential for demolition and construction activities to mobilise ground contamination and/or to generate pollution since there are existing potential pathways for mobilised pollutants to find their way into Cove Brook. However, these potential risks are well known and understood and, as a result, it is considered that they can be adequately and conventionally avoided and mitigated through management and other measures to be implemented and retained for the duration of works on site that would be incorporated into Phase (or part thereof)-specific Construction Environmental Management Plans (CEMPs) to be required with each Reserved Matters stage. It is not anticipated that the proposed development, once operational, would be likely to give rise to any significant water quality issues and clear objectives and expectations in terms of water quality measures are set out in the revised Design Code document **[Doc 8]**; and the application is also accompanied by a Drainage Strategy **[Doc12]** that identifies and considers water quality issues in the design strategy of the drainage scheme for the proposed development.

Camberley Sewage Treatment Works (STW) : Notwithstanding the acknowledged lack of evidence of any adverse impact being likely and raising no water quality objections in respect of the potential impact of the proposed development upon the STW issue, the Environment Agency (EA) has nonetheless highlighted the risk and advised LPAs to be satisfied that proposed development would not have an impact on water quality as a

result. The EA's concern in this respect is, however, essentially a regulatory matter between Thames Water (the operators of the Camberley STW) and the EA the subject of other legislation outside of planning. This requires Thames Water to make the necessary improvements to the Camberley STW so that it can operate within the requirements set by EA permits. Furthermore, although the proposed development the subject of the current planning application is of large-scale, it is considered unlikely to generate high volumes of wastewater discharge into the foul sewerage system given the likely low employment density of the proposed mix of employment uses. Further, the CTP proposals are a phased development to be implemented over an extended time period, such that it is not considered likely to pose any undue demand upon surface water drainage capacity that could give rise to unacceptable risk of pollution to surface water quality due to impact on the Camberley STW. In this respect Thames Water has raised no objections to the proposals; and the EA has confirmed that it will work with the Council through the plan-making process to ensure that there is sufficient wastewater capacity for all future developments to be identified within the new Local Plan, with residential development in the Borough being the largest potential source of wastewater. This would, of course, be required even if the operation of the Camberley STW is improved given the usual focus of planning activity upon providing new residential development. The EA has confirmed that they have no objections to the CTP proposals in respect of the STW issue they have raised.

External Lighting : This is primarily a potential impact that could arise during night-time hours when external lighting within a proposed development can give rise to visual impacts and, indeed, potentially draw attention to the presence of the site that may not be so significant, or occur at all, during daytime hours. There is also the potential for disturbance effects in respect of on- and off-site ecology. In closer proximity to the proposed development, external lighting has the potential to give rise to nuisance issues for neighbours. However, no material and adverse impacts have been identified and these potential impacts have, indeed, been screened-out of consideration in the ES as a result. An External Lighting Strategy **[Doc 11]** has been submitted with the application. Nevertheless, in the circumstances, it is considered that it would be sensible to condition phase (or part thereof)-specific details of proposed external lighting to ensure that there is no adverse impact on residential amenity or other sensitive receptors. It is considered that this can be appropriately addressed as a Reserved Matter requirement and, indeed, the revised Design Code document **[Doc 8]** also sets out clear expectations for the minimisation where possible, specification and deployment of external lighting development in various respects.

Climate Change : This principally relates to seeking to reduce greenhouse gas emissions in order to curb global warming, which is the driver for climate change. In this respect, the UK Government is pursuing measures to achieve net-zero in greenhouse gas emissions to meet the UK's international obligations under the Paris Agreement 2015 with targeted reductions in a UK national greenhouse gas emission budget rather than setting requirements for the climate change performance of individual proposed developments. Nevertheless, the UK Government is legally required to consider climate change when making plans at a national, regional, and local level and, as result, the NPPF now explicitly requires that climate adaptation and mitigation be central in the preparation of planning applications and the formulation of planning policies. However, whilst climate change may be a material consideration in making individual planning decisions, there is neither a statutory UK legislative requirement for decision makers to

explicitly consider climate change as a determining issue, nor statutory guidance in the UK on the assessment of climate change issues in the context of the determination of planning applications.

Additionally, although Rushmoor BC declared a Climate Emergency and published a Climate Change Action Plan in June 2019, this is not an adopted planning policy that forms part of the Council's 'Development Plan' for the purposes of making decisions on planning applications. Local Plan Policy DE1 (Design in the Built Environment) requires new development *"....to make a positive contribution towards improving the quality of the built environment...."* such that the Council will, where relevant to the proposal at Criterion b. of the policy *"Promote designs and layouts which take account of the need to adapt to and mitigate against the effects of climate change, including the use of renewable energy"*; however this is more a statement of intent and encouragement to developers rather than a policy capable of justifying refusal of planning permission on climate change grounds.

ES Chapter 10 [**Docs ES2.10 and ES4.21-ES4.24**] assesses climate change in the light of a Greenhouse Gas (GHG) Assessment submitted with the application. This can only make broad assumptions about GHG emissions given the outline nature of the proposals. However, the Assessment acknowledges that, as is the case for most development proposals, the proposed development would, both directly and indirectly, release GHGs into the atmosphere during both its construction and operational phases. However, it is asserted that, on balance, the proposed development would emit GHGs more efficiently than existing buildings that would be replaced as a result of the development. Also that, since approximately three-quarters of the GHG emissions would relate to consumption of electricity, these are expected to reduce over time as electricity generation in the UK switches increasingly to electricity generation from renewable sources. Ultimately, the current UK Government approach to climate change focuses on the UK meeting its national budget for GHG emissions as it reduces over time, whether this is through GHG emission reduction measures being taken within the UK, or through off-setting GHG emissions abroad. Within this overall context the contribution to GHG emissions attributable to the proposed development is expected to reduce over the lifetime of the development and is, in any event, a very small proportion of the overall UK's National GHG budget set by the Government. Accordingly, it is considered that there is no reason to consider that the proposed development would harmfully, or at all, compromise the Government's stated climate change obligations.

4. Quantum of Development -

The Parameter Plans submitted for determination with the application describe a volume of built development that could, if built to the maximum extents indicated by the application proposed 'Control Documents', provide up to 143,000 sqm of floorspace, although there is no obligation on the developer to achieve this maximum floorspace provision and; indeed, a combination of other constraints imposed on the proposed development could render a lower quantum of floorspace achievable than the maxima sought with the application within some of the Development Plots.

Making generous estimates for robustness, it is calculated that the total developable area of land within the red-line of the application site as defined by the submitted Development Zone Parameter Plan is approximately 250,000 sqm (or 25 Ha) and the

total floorspace proposed is 143,000 sqm. Accordingly, even if, improbably, all of this proposed floorspace to be built were to be single-storey only, the footprint of buildings would therefore comprise 57% of the developable land area within the application site, thereby leaving 43% of the developable land area for parking, service areas, ancillary equipment and other installations etc.

Furthermore, breaking-down the proposed floorspace by Development Zone indicates that the maximum single-storey only building footprints in respect of DZs 1 (Ball Hill), 2 (Ball Hill Data Centres) and 4 (Data Centres) relative to the developable land areas within these DZs would be 45%, 56% and 53% respectively, which is lower than the overall average. This indicates that the proposed quantum of development there is realistic and that there is no reason why the proposed quantum of development and associated installations and ancillary facilities within DZs 1, 2 & 4 could not be accommodated satisfactorily and in accordance with all required standards.

In contrast, DZ3 (Proposed Headquarters Site), having an estimated developable area of 2.97 Ha (29,700 sqm), is proposed to accommodate a maximum of 32,000 sqm of floorspace, such that this quantum of proposed floorspace would, if built solely at single-storey height, have a building footprint exceeding the estimated developable area of this DZ (i.e. 108% ground coverage). However, if the proposed building(s) within this DZ were solely 2-storeys in height, the developable land-take within DZ3 reduces to 56%; and it would reduce to 36% with solely 3-storey building. Given that DZ3 is indicated to provide a 'Headquarters' and also indicated within the Design Code document **[Doc 8]** to contain a multi-storey car-park it is clear that it is envisaged that this DZ would contain buildings with a number of storeys, such that the proposed maximum quantum of floorspace (and, indeed, its parking provision) for DZ3 could also be plausibly accommodated satisfactorily within the developable land area there.

It is considered that the proposed maximum building heights (to include the tallest structure attached above the roof of a building) also indicated by the Development Zones Parameter Plan are consistent with the preceding floorspace-to-developable land area analysis and, as such, are also realistic since they clearly provide the option for buildings or parts of buildings to contain at least 3, or maybe 4, storeys. The maximum building height parameter for DZ 1 is 20 metres, 22 metres for DZs 2 and 4; and 25 metres for DZ 3. Storey heights for offices are typically 4 to 4.5 metres, possibly 4 to 5 metres for laboratory buildings and multi-storey car parks; and the height parameter would comfortably accommodate the typical heights of larger single-storey industrial or storage buildings with their roofs and any ancillary structures, plant and roof installations. Therefore, it is considered that there is clearly adequate and appropriate flexibility provided within the maximum height parameters that are being sought.

In the light of this analysis of the proposed building parameters, it is concluded that the proposed total maximum quantum of development proposed with the Development Zones Parameter Plan could be plausibly, realistically and satisfactorily accommodated within the confines of the developable parts of the application site.

5. Design -

It is considered that high quality design is an essential requirement and expectation of the proposed development for both the Developer and the Council and is, indeed, a

requirement within the Local Plan, and Government planning policy and guidance. However, except for considering the basic layout design for the proposed development that is described collectively by the Parameter Plans, consideration of the detailed design and external appearance of the proposed development is otherwise reserved for future consideration at the Reserved Matters stage.

Nevertheless, it is considered that the basic layout design of the proposed development to be determined with the current outline application is acceptable and provides a credible framework on which the detailed design elements of the development can be formulated, considered and approved at Reserved Matters stage.

The proposed 'Control Documents' of the outline application, principally the proposed Parameter Plans, have been formulated and informed by a careful and considered design process that is described in the submitted Design & Access Statement **[Doc 7]**.

A Design Code document **[Doc 8]** has also submitted with the application as a further proposed 'Control Document' to be determined at the outline stage. This is in recognition of the need to formulate mandatory and advisory design elements to inform and shape the detailed design of the proposed development to be prepared for submission and consideration at the Reserved Matters stage. The evolution of the Design Code has resulted in some feedback being provided by consultees and the case-officer, which has resulted in a revised improved version of the Design Code document being submitted in February 2026. This is now considered to be acceptable for the purposes of backing-up and providing detail beyond that shown by the submitted Parameter Plans. In this respect, although much of the proposed development would be inward-looking, the revised Design Code document contains an extensive suite of mandatory design expectations for the external design and appearance of buildings, external finishing materials, width and surfacing of external roads, paths, servicing areas etc. This is in addition to clear requirements for means of enclosure, structural streetscape, screen, buffer and structural planting of both the boundaries of the site, but also divisions between the building plots and DZs.

On this basis it is considered that the proposed development exhibits acceptable good design in basic site layout form; and appropriate and robust means and measures would be put into place to ensure that the design quality of the proposals can be positively influenced and maintained thereafter.

6. Landscape & Visual Impact –

Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by, among other things, protecting and enhancing valued landscapes and by recognising the intrinsic character and beauty of the countryside. It is also general Government planning guidance that, in assessing impact of proposed development upon the visual character and appearance of an area, this should be considered in the light of the impact upon the area as a whole. As a result, the existence of mere differences in visual appearance are not likely to be sufficient to identify material harm to the character and appearance of an area. Indeed, it is extremely rare for the visual appearance of an area to be so narrowly defined : the character of most landscapes is usually defined by a mixture of features and characteristics and the extent to which material planning harm would arise depends upon how important (and

sensitive) the landscape and visual character is when considered against the extents to which a proposed development would affect this character and how discernable, and from what distance, this would be from publicly-accessible vantage-points.

Because the proposals are in outline form, the appearance of the development is not a matter on which planning permission is being sought with the current application; and the visual impact can only be assessed in terms of the basic outline form of the development as described by the submitted Parameter Plans. The Landscape & Visual Impact Assessment (LVIA) of the proposed development at Volume 2 of the ES **[Doc ES3]** has also, necessarily, assessed the proposals on the basis of the maximum extent of the building envelopes for the development described by the submitted control documents of the application, namely the Parameter Plans and Design Code document **[Doc 8]**. However, this means that the worst-case for the proposals has been considered and, as the previous section of the Report has noted, the level of development proposed appears likely to fit comfortably within the maximum parameters for which permission is being sought. It is therefore considered that the LVIA makes a robust and realistic assessment of the landscape and visual impacts of the proposed development both whilst under construction, but also when completed and operational.

The application site is situated in a relatively isolated position on the western margin of the Borough between the Farnborough and Fleet urban areas – and the land at CTP and surrounding is identified by both the Rushmoor and Hart Local Plans as being countryside. Although already the site of substantial existing built development, CTP and the adjacent Ball Hill site have limited visibility from publicly-accessible places and, as such, have limited landscape and visual impact. There are large areas of woodland and heathland, including the Eelmoor Marsh SSSI/SPA and the Ball Hill SINC directly surrounding parts of the application site to which there is currently, and would continue to be, no public access. There are also few public rights of way within the vicinity of the site. There is a bridleway (089/725/1) 600 metres west of the site that runs north from Old Ively Road and the Basingstoke Canal towpath past the western side of Hartland Park to join the bridleway between Fleet and Southwood (Farnborough) adjoining the SW main-line railway. There is also a short distance local footpath (202/10/1) 320 metres north-east of the site that crosses the eastern side of Southwood Country Park. Finally, a cycle/footway adjoins the northern boundary of parts of the Ball Hill portion of the application site to the south side of Ively Road between the Ively and Whittle Roundabouts. However, it is considered that, even from this adjoining path, any views into the site would be fleeting and limited due to the screening effect of intervening trees and vegetation within the site and between the adjacent path and Ively Road to be retained – some of which is within the Ball Hill SINC. As such, it is considered that, despite significant proposed development within DZ2 in particular being close, views of it and the application site from the nearby section of Ively Road would remain limited.

In addition to the tree and other vegetative cover that restricts and filters views of the application site, the topography of the land surrounding the application site also influences the extent to which site is visible within the landscape and, indeed, much reduces the public places from which the site as existing and as proposed can/could be seen to more distant views only. The application site and its immediate surrounds are relatively flat land on the margins of the much wider expanse of relatively level land at Farnborough Airport that ranges from approximately 65-70 metres AOD (Above Ordnance Datum; i.e. sea-level), as is much of the Farnborough urban area west of the

A325 Farnborough Road; but only, in parts, up to approximately 80 metres AOD east of the A325. Ball Hill is a relatively small topographical feature on the immediate margin of the application site and, as such, of limited significance in terms of the visibility of the site from public places. The Fleet urban area sits between 70 metres AOD in the north, rising to 105 metres AOD to the south. There is more pronounced topography some distance to the south, east and west, with the highest ground being at Caesars Camp (184 metres AOD), which is approximately 4km distant to the south. Views to the north towards the application site from Caesars Camp are of a landscape that appears to be mostly heavily wooded, but through which distant views of the upper parts of some larger buildings, such as the aircraft hangars, can be glimpsed adjacent to the runway at Farnborough Airport.

Existing and proposed development at the application site is/would be partially visible from some land within Farnborough Airport, which adjoins the site to the south-east; however these would not be public views; and any views of the site from publicly-accessible places over and beyond the Airport are only possible at considerable distance - and only then because the Airport is a large expanse of open land mostly entirely devoid of the tree and other vegetative cover that is typical of most of the other countryside areas surrounding the boundaries of the application site.

The LVIA specifically scopes-out some public places from further consideration where the visual impact was assessed as either being non-existent or negligible, notably including the Southwood amenity open areas, residents of properties on the nearest edge of Fleet, residents of Hartland Village, workers at businesses on the western edge of Farnborough, users to Templar Avenue and Fowler Avenue and users of Watts Common (largely the Army Golf Club).

The LVIA concludes that the application site is visible primarily in near distance views (i.e. within 100 metres), such as from viewpoints within the wider Cody Technology Park itself and from within the adjacent Farnborough Airport, with more fleeting partial views from Ively Road and Elles Road. Any medium- and longer-distance views, being, at best, partial and heavily 'filtered', are considered much less significant. As such, although the proposals would result in noticeable changes on the ground, these would only be readily evident to people within CTP and passers-by and occupiers of adjacent and nearby properties in the immediate locale of the application site - and this impact would largely be limited to the demolition and construction phases only. Nevertheless, it is considered that the visual mitigation measures embedded within the design of the proposed development, namely the strategic landscape proposals, would quickly soften these adverse effects. It is concluded that none of the identified landscape and visual receptors would be subject to significant adverse impact as a result of the proposed development once completed and operational, even when the landscaping is new. Indeed, it is considered that there would be some beneficial effects arising from the replacement of some older buildings with newer structures, combined with the strategic and structural planting that forms part of the committed proposals. Further it is concluded that there would be no significant and adverse cumulative landscape and visual impacts arising due to the significant landscape and visual separation between the proposed development and the other major developments that may arise in the area with in a similar timescale.

Accordingly, provided that careful attention is paid to the design and external materials of the buildings, and the new tree planting and other strategic and structural landscaping to be provided, at the Reserved Matters stage, it is considered that the visual impact of the proposals would be acceptable. Although focused on the appearance of the streetscape within the proposed development, the Design Code document **[Doc 8]** provides a strong means of ensuring good quality design for the proposed buildings and the treatment of the spaces around them and, of particular relevance to external visual and landscape impacts possibly discernible from public places, the roofscape and roofing materials to be used. The impact on the wider landscape beyond as seen from more distant view-points would not be anywhere near as significant as the local visual impact and is also acceptable in visual terms. That said, it is considered that the scale and character of the proposed development would not appear out of place in this location and be seen as an extension to CTP : which is, indeed, exactly what the proposals are.

Local Plan Policy NE2 states that the Council will expect proposals within or adjoining green corridors, in this case the adjacent Cove Brook corridor, to enhance their landscape and amenity value. The landscaping of the proposed development is a Reserved Matter for future consideration, however the proposals clearly offer the opportunity for substantial improvements to enhance the quality, amenity value and function of the Cove Brook corridor as a result of the boundary structure planting to be secured with the proposed development, notably including the strategic planting defined by the Structural Landscaping Parameter Plan.

Overall, it is not considered that the proposed development would materially and harmfully affect the landscape and visual character and appearance of the area such that the proposals are considered acceptable having regard to the requirements of Local Plan Policy NE5. Furthermore, the proposals provide an appropriate framework for detailed proposals to come forward that would be acceptable in visual and landscape terms.

7. Heritage Impact –

A Cultural Heritage Desk Based Assessment **[Doc 6]** has been submitted with the application to assess the archaeological and cultural heritage potential of the application site having regard to Para.207 of the NPPF. Accordingly, this section considers impacts upon designated and non-designated heritage assets and archaeology, as follows:-

Conservation Areas : The application site is not located within or near a Conservation Area : the Basingstoke Canal Conservation Area is located a minimum of approximately 700 metres west of the application site (at DZ4 only); and it is not considered possible to gain any significant view, if at all, of any part of the application site land from within this Conservation Area. Without having any visual relationship, it is considered that the setting of the CA cannot therefore be materially affected by the proposed development.

Listed & Locally-Listed Buildings : Nor are there any statutorily Listed or locally-listed buildings within or adjoining the site. The nearest statutory Listed Buildings within Rushmoor are the Airship Hangar Frame and Wind Tunnels at Farnborough Business Park; and also the nearby Buildings G29 (the ‘Black Shed’) and G1 (Trenchard House); all of which are located on the east side of Farnborough Airport over approximately 1.5 km distant from the application site. The nearest Listed Building with Hart DC’s area is

Fleet Infant School on Velmead Road, Fleet, approximately 2.5 km distant from the application site. In terms of locally-listed buildings with Rushmoor, a similar pattern arises, with the Swan Inn on the Farnborough Road being one of the nearer identified buildings of local importance with at least a distant line of sight towards the application site. Accordingly, it is not considered that the historic character and setting of these or any other Listed buildings would be materially affected by the proposed development.

Archaeology : The nearest designated archaeological heritage asset to the application site is the tumulus at the Queens Roundabout in South Farnborough; and the site is not situated within an Area of High Archaeological Potential. Furthermore, the majority of the site has already been subject to severe below ground disturbance as a result of site levelling and excavations before and after the DRA development of the application site. The least disturbed ground in this respect is located with DZs 1 & 2, the Ball Hill portion of the site, where, historically, less development has taken place to date.

The County Archaeologist has been consulted and has responded in respect of the application and, indeed, also commented previously upon the proposals in respect of the EIA Screening to agree that archaeology could be scoped-out of the ES. In response to consultation in respect of the planning application itself they have confirmed that there is little archaeological interest noted in the area and that the historic landscape character of the area implies a lower archaeological potential overall; and, as such, agrees that there are not any below ground archaeological issues. However, they have noted that a number of existing buildings at the application site are to be demolished and have requested additional information regarding their origin, date, historic purpose and an assessment of whether they may have any heritage value as 'above-ground' archaeology, if only for the purposes of compiling a record of them prior to their loss in view of the importance of the site in the origins and development of aviation.

A revised Cultural Heritage Desk Based Assessment **[Doc 6]** was submitted in January 2026 that includes a brief review of the older built components of the former RAE/DRA establishment that are to be demolished to address this issue. This was followed by a Written Scheme of Investigation for Historic Building Recording Report (February 2026) (a WSI) received on 10 February 2026 **[Doc 34]**. The buildings proposed for demolition mostly post-date the Second World War and, due to the evolution of the site, it is noted that neither the Second World War nor later buildings have any legibility within the current site context and the nearby airfield. Accordingly, the County Archaeologist accepts that they are not of local importance, albeit it is recommended that an archaeological condition be imposed with any planning permission to be granted in order to secure a record of the affected buildings prior to demolition. In this respect, it is advised that, unless the buildings are known or found to be associated with particular projects in the work of the RAE in the ushering in of the Jet Age, a Level 1 Written Scheme of Investigation (WSI) record – simple photographic and descriptive – would suffice. It is considered that a suitably-worded condition in this respect can be imposed to require the appropriate WSI to be undertaken when necessary.

A metal facsimile replica of Cody's Tree is situated within the existing CTP South site near the front entrance at Concorde Way (Access 2) and, as such, is located outside but near the red-line of the current application site between DZs 3 & 4, albeit within the blue-lined area within the ownership and control of the Applicants. It is a reminder of the early history of aviation and the contribution made to this by Samuel Franklin Cody

during the testing of his first aeroplane in the early 19th Century. This monument would not be affected by the current proposed development. However, obligations on the owners of the CTP site to retain and maintain this monument are currently secured with the 1995 S299A Legal Agreement that the Applicants' wish to either amend or extinguish and re-cast within a new s106 Agreement. However, provided that the requirements to retain and maintain the Cody Tree monument are, by whatever means, continued, it is considered that the future of the replica Cody's Tree monument would be satisfactorily secured.

The Cody Astronomical Observatory mentioned in some of the comments made as a result of the community engagement exercise undertaken by the Applicants is not a statutory or non-statutory heritage asset. It is located within the existing CTP South complex of buildings to be retained outside the red-lined application site, but within the blue-lined land denoting land within the ownership and control of the Applicants. The Applicants are, accordingly, aware of the concerns communicated to them by representatives of the Observatory. However, they are not considered to be matters that can be taken into material account in the consideration of the current planning application.

It is considered that the proposed development would have an acceptable impact upon heritage issues.

8. Trees -

Adopted Local Plan Policy NE3 (Trees and Landscaping) seeks to protect existing trees which are worthy of retention, particularly those subject to Tree Preservation Orders (TPOs). In this respect, proposed new development will be expected to make provision for tree and general planting in order to improve the level of tree coverage within the Borough. However, this is not a policy that can be considered in isolation of other policies within the Local Plan, especially those with objectives and/or requirements that could have consequences for tree loss.

In this context, the proposed development seeks to deliver a high-quality design incorporating an appropriate level of landscaping in order to create an attractive and functional working environment. In this respect, the key landscape components are shown on the Strategic Landscape Parameter Plan; and additional principles for landscape design and the approach to be taken to considering tree loss and avoiding unnecessary losses are set out within the Design Code document **[Doc 8]**.

There are a large number of trees across the site including areas of mixed broadleaved woodland, pine plantations, areas of birch/willow as well as many individual trees including some mature oaks. The small number of larger trees are survivors of previous developments/uses of the land within the Ball Hill portion of the site; however the majority of trees within CTP South were planted as a result of the re-development of the land in the mid-1990s and, as such, are now early mature specimens of approximately 30 years in age at most. The application site is also, of course, also bordered by significant areas of land containing trees that would not be affected by the proposed development.

The Arboricultural Impact Assessment Report (AIA) **[Doc 2]** submitted with the application has identified, surveyed and recorded a total of 472 trees and tree groups

within the application site; comprising approximately 17 % Category A, 55% Category B and 18% Category C trees, with the remaining 10% being Category U, which are, by definition, trees that best arboricultural practice recommends ought to be removed.

None of the trees and tree groups within the application site are subject to a Tree Preservation Order; and none are situated within a Conservation Area either. There are also no legal obligations and/or planning conditions relating to the application site from previous planning consents that restrain the loss of trees at the site. It is also of note that none of the trees on site meet the definition of ancient or veteran specimens on the basis of their size and characteristics and, as such, are not subject to additional protection as irreplaceable habitat.

Based upon the Illustrative Masterplan, the AIA considers the potential consequential tree loss that might arise from the construction of the proposed development for the purposes of the Environmental Impact Assessment; and also to inform consideration of the proposals generally. In doing so, some general assumptions are made, with the indicative results shown on a Tree Removal Plan. However, the indications for tree removal are **not** definitive and the Tree Removal Plan is not submitted for determination with the current outline application. As such, granting outline planning permission would not authorise the removal of any trees from the application site until Reserved Matters approval(s) have been obtained which, at a later stage, would be required to explicitly identify and justify the tree loss involved and, indeed, also require consideration be given to retaining trees of higher value if at all possible within the detailed proposals. In this respect, the Applicant is aware that mature individual trees have a high biodiversity unit value for the purposes of BNG calculations and, as such, that there may be cost savings for the developer associated with retaining trees where possible.

Based on the Illustrative Masterplan, the AIA anticipates the possible removal of 175 trees and 38 tree groups, thereby comprising approximately 45% of the trees/tree groups within the application site. These comprise the following:-

- Category U – unsuitable for retention: 35 trees
- Category C – low quality: 28 trees and 13 groups.
- Category B/C – between categories B and C: 17 trees – T36, T55, T56, T97, T98, T110, T118, T121, T125, T126, T130, T380, T391, T400, T427, T430 and T451; and 9 groups – G24, G27, G32, G37, G44, G53, G73, G83 and G84.
- Category B – moderate quality: 37 trees and 9 groups:- T11, T35, T52, T65, T240 – mature oak trees showing die back or poor form; T24, T51, T61, T67 – early mature oak; T30, T31 – mature alder showing moderate vigour; T44, T110, T116, T247 – semi mature oak; G38 – a 180 sqm group of oak/birch; T58 – early mature walnut; G79 – one early mature beech; G80 – 5 early mature Horse chestnut; T101, T181, T246, T364 – mature birch; G108 – a group of birch (170 sqm); T111, T114 – early mature pine; G115 – approx. 8,700 sqm of mature pine plantation which has reached maturity and would normally be felled and replanted as part of normal forestry operations; G120 – a group of 4no mature pine; T124 – a 5m walnut; T131 – a 15m alder; G165 – a group of two early mature pine, up to 11m in height; G167 - a group of two early mature pine, up to 14m in height; G366 – a 150m2 group of closely spaced oak and birch; T368 – a semi mature birch; T369, T370, T371 – semi mature Horse chestnut up to 9.5m in height; T381, T399, T405, T406, T410, T419, T431 –

a semi mature Norway maple; T448 – a semi mature pine; T459 – a semi mature field maple; and T472 – an early mature birch.

- Category A and A/B– good quality: 25 trees and 3 groups:- T18, T28, T40, T41, T42, T46, T50, T62, T71, T72, T127 – early mature oak; G19 – 5no early mature oak; G29 – a pair of early mature oak; G33 - 4no closely spaced mature oak; T34, T39, T43, T45, T54, T63, T64, T66, T76, T96 – mature oak; T102, T119 – a mature pine; T123 – an early mature walnut; and T176 – an early mature sycamore.

The Arboricultural Method Statement within the AIA **[Doc 2]** is, of necessity, only preliminary at this stage. Should outline planning permission be granted, a detailed Arboricultural Method Statement would be prepared before work on site starts on any development phase or plot, to include consideration of the provision of all proposed works required in addition to the erection of the proposed buildings themselves - such drainage runs, hard surfacing and other ancillary infrastructure installations and facilities.

Protection measures are also specified to protect the Root Protection Areas of all trees to be retained. No-Dig construction has been specified for new hard surfacing within the Root Protection Area of retained trees. For 6 trees (T23, T47, T48, T78, T104 and T148) more than 20% of the Root Protection Area is anticipated to be covered in new hard surfacing. Although this is greater than recommended in BS5837 and some loss in vigour is likely, the Applicants' Arboricultural Consultants consider that the retention of these trees is both feasible and desirable.

Although a considerable number of trees will be removed, the Council's Arboricultural Officer is content that an appropriate approach is being taken to balance tree loss against other objectives and benefits of the proposed development. It is considered that the site would still continue to contain a significant number of trees - and that these would be enhanced by significant new tree planting. Indeed, the Design Code document **[Doc 8]** commits the Applicants to both (a) the planting of a significant number of new trees in excess of the numbers required to be removed; and (b) embeds requirements for developers to seek to retain as many existing trees as possible during the detailed design process. Indeed, it is also noted that, in order to meet BNG requirements, the developer would be required to provide at least 2 replacement trees for every one lost and, as such, there is an incentive not to undertake any needless tree removals. These requirements are also mandated within the revised Design Code document.

Combined with strong tree protection measures and a clear framework of structural boundary and internal landscaping to be introduced throughout the development, it is considered that the objectives of Local Plan Policy NE3 would be met.

9. Impacts on Neighbours -

The Council must consider whether or not the impact of the proposed development, as submitted in Parameter Plan outline form only, is likely to be materially and demonstrably harmful to neighbours in planning terms to the extent that refusal of outline planning permission would be justified.

When considering impacts upon residential neighbours, the basic question for the Council to consider is whether or not the impacts of the proposed development on the amenities of such neighbouring properties would be both materially and harmfully impacted in planning terms. The correct test in this respect is whether or not existing

neighbouring residential properties would, as a result of the proposed development, maintain acceptable amenities to meet the needs of residential occupation. It is not the role of the Planning system to defend neighbours against the loss of any private views from their properties where these views are derived from over adjoining land not in their ownership. In terms of privacy concerns, a degree of mutual overlooking often exists between neighbours and this is considered both normal and acceptable. It is necessary for the Council to consider whether or not occupiers of neighbouring residential properties would be likely to be subjected to unacceptable undue overlooking rather than any overlooking at all. The considerations in respect of any non-residential neighbours are simpler, in this case the occupiers of existing commercial units within CTP South, in that the Council should consider whether the proposed development would be likely to have any material and harmful impacts upon the continued operation of neighbouring non-residential uses.

Other than adjoining and nearby existing occupiers of commercial properties within CTP South, the proposed development has very few adjoining or nearby properties that could be considered to be neighbours. The site is situated in a relatively isolated position. The nearest neighbours comprise a pair of semi-detached houses at Nos.128 & 130 Old Ively Road, which have front facades that are situated approximately 100 metres north of the nearest part of DZ3; and much greater distances from the other proposed DZs : at the nearest points approximately 450 metres from both SZs 1 (Plot 7), 2 and 4; and a minimum of approximately 700-800 metres from most parts of DZ1. It is considered that the considerable separation distances involved mean that no material and harmful impacts upon these neighbouring residential properties could arise from the physical presence of the proposed buildings given a maximum building heights capped at 25 metres above ground level, despite the likelihood that the buildings would nevertheless be large in scale relative to these semi-detached houses. Although objection has been raised concerning the potential for undue overlooking, the possibility of this having a material adverse impact is also ruled out by the separation distances involved. In terms of traffic noise and activity using Concorde Gate (Access 3), this has now for many years been the principle vehicular access into CTP South and was considerably busier in the past when the DRA (and then Qinetiq) occupied all of the CTP South site. Whilst it is evident that the occupiers of Nos.128 & 130 Old Ively Road would be well aware of the proposed development once built, most particularly in respect of DZ3, it is not considered that the proposed development, once completed and operational, would have material and harmful impacts on occupiers sufficient to justify refusal.

The next nearest residential neighbours to the application site are new residential properties at the Hartland Park development, which are located a minimum of approximately 500 distant from the north side of DZ4, with CTP North situated in-between. Nos.1 & 2 Pear Tree Cottages are situated a minimum of approximately 600 metres distant from any part of the application site. On this basis, it is also considered that none of these other residential properties would be materially and adversely impacted by the proposed development.

It is not considered that adjoining and nearby commercial premises would be materially and harmfully impacted by the proposed development, despite, in many cases, their closer proximity to the new development than any residential neighbour.

In the case of Farnborough Airport, the largest neighbour to the application site, the Applicants have noted and, it is considered, satisfactorily responded to the various concerns expressed in their objections. Subject to some conditions that have been identified it is not considered that the operations of the Airport would be materially and harmfully impacted by the proposed development and any issues can be resolved once full details of the proposals come forward at Reserved Matter stage. In this respect, it is understood that the Applicants and Farnborough Airport are maintaining an on-going dialogue concerning the CTP proposals and this would, no doubt, continue.

Other than those neighbours specifically identified in this section of the Report, it is not considered that there are any other neighbours who could conceivably be materially and harmfully impacted by the proposed development.

Demolition & Construction Period Impacts : The ES and other application supporting documents submitted with the application dealing with Noise in particular, inevitably identify likely impacts on neighbours, albeit on a temporary basis, as a result of the demolition and construction phases of the development, but also as a result of traffic generation.

Although planning applications cannot be refused on account of the likely demolition and construction phase impacts, given the scale, the phased implementation of the proposed development over an extended period, and the clear potential for such activities to give rise to nuisance and inconvenience to neighbours in this location, it is considered appropriate and reasonable that conditions be imposed to seek to mitigate such impacts – if only to alert the developer to the need to have regard to such matters. The primary condition considered necessary in this respect would be a Construction Environmental Management Plan (CEMP) to set out the measures to be employed during the demolition and construction phases to minimise noise, vibration, dust and other emissions to, as far as practicable, limit impacts upon the amenity of neighbours and people in the vicinity in general. Likewise, the parking and traffic generation impacts of the demolition, construction and fitting-out periods of the development can be addressed within the Construction Traffic Management Plan required by National Highways **[in framework form at Doc 13]**.

Subject to the imposition of appropriately-worded conditions, it is considered that impacts on neighbours would be adequately addressed at Reserved Matters stage.

The impacts of the proposed development upon the adjoining and nearby nature conservation sites are considered later in the Report within the **Ecology** section.

10. Highways Considerations –

It is current Government Planning Policy in the NPPF (Para.116) that development should only be prevented or refused on highway grounds *“if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*

Further, at Para.117 the NPPF continues by stating that:

“Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

NPPF Para.118 then notes that:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”

It is also long-standing Government guidance that it is neither appropriate nor reasonable for developers to be required to resolve existing highway problems in the vicinity of their site in order to secure planning permission that they are neither responsible for, nor would materially exacerbate, as a result of their proposals.

General : The proposals have been the subject of extensive discussions between the applicants, their highway consultants, the Council, and local highway authority (Hampshire County Council : HCC). Following initial consultation responses received on 8 December 2025 and 18 February 2026 requesting more and amended information, HCC Highways has concluded, by consultation response letter dated 7 May 2026, that the proposals are now acceptable in transportation and highways terms subject to conditions and a legal agreement.

Proposed Means of Access to the Development : The means of access to the proposed development in principle is to be determined at the outline stage. In this respect, it is proposed that the development uses the four existing accesses to CTP South that are either already in active use or the Applicants are already legally entitled to use. In this latter respect, the proposed data centre on DZ2 would use Access 4 (Ively Gate) which would, as a result, be used more regularly than it is at present. HCC Highways has not raised any technical objections to the continuation of the use of any of these existing accesses with additional traffic or, indeed, required any modifications to them and their forward visibility site-lines.

Traffic Impact : A full Transport Assessment (TA) [Doc 25] was submitted with this outline planning application and the accompanying ES (Chapter 7) [Docs ES2.7 and ES4.7 & ES4.8] further considers the potential transport impacts of the proposals from an environmental perspective. The traffic generation potential of the proposed development has been a particular focus of the examination of the application by HCC Highways and National Highways. Given the significant increase in commercial floorspace that is proposed (up to 143,000 sqm) it is inevitable that there will be additional traffic generation. Both HCC Highways and National Highways have very

carefully considered whether the traffic impacts of the proposals can be accommodated acceptably within the surrounding local and strategic road network.

The consideration of the traffic impacts of outline planning applications for large developments presents difficulties for assessment because the development will not usually be built and become operational all at once. Most large-scale developments, such as the current proposals, are built in phases over a significant number of years, which means that the traffic impacts increase gradually or in steps over a period of time. Large-scale developments also give rise to extended periods of construction activity, which can also temporarily add to traffic on the highway network; and there will be a mix of both construction and operational traffic for a number of years.

HCC Highways has, in particular, considered the flexible mix of uses that is being sought with the application and has questioned whether the submitted Transport Assessment (TA) has correctly modelled worst-case traffic generation potential. The flexible range of uses sought with the application has the potential to give rise to a wide range of employment densities within a development, thereby resulting in a wide range of potential traffic generation outcomes. The originally submitted TA modelled traffic generation based upon assumptions for the mix of uses that are envisaged by the Applicants, but these assumptions have been critically examined by HCC Highways, whom have asked for additional modelling to be undertaken to consider the possibility of an overall more employment dense mix of commercial uses occupying the proposed development. It is also necessary to consider that the proposals are for a permanent development where the continued occupation of the development is required to remain flexible over time to allow firms occupying units to evolve in place : for example from the evolution of research & development into a manufacturing operation over time.

In this respect, HCC Highways initially suggested that a condition be imposed to limit the degree of flexibility of the flexible range of commercial uses being sought with the application as a way of pinning the traffic generation potential of the development to the mix used in the TA. However, this option is unacceptable to the Applicants because limiting the flexible mix of uses in this way would render the scheme unviable and unlikely to obtain the necessary development finance to enable it to proceed. HCC Highways has, however, welcomed the Applicants' invitation to the Council to clarify by condition that the proposed commercial floorspace for DZs 2 & 4 is to be solely data centres rather than general Use Class B8 (storage & distribution uses) since data centres give rise to considerably less employment generation than an open B8 use.

Following the earlier consultation responses from HCC Highways, the Applicants have provided a sequence of additional information and clarifications for HCC Highways to review, most recently in the form of a Highways Technical Note 10 (dated 30 March 2026) produced by Motion, the Applicants' Highways Consultants **[Doc 32]**. However, Note No.10 was preceded by Technical Notes 5 (3 February 2026), 7 (24 February 2026), 8 (4 March 2026), and 9 (23 March 2026); and also a TA Addendum (27 January 2026) **[Docs 26-31 inclusive]**. Collectively these have provided HCC Highways with a range of options for highway improvements to consider.

As a result, HCC Highways have subsequently concluded that the traffic impacts of the proposed development can be satisfactorily addressed through the undertaking of off-site highway works aimed at encouraging better and safer access to and from the proposed development by cyclists and pedestrians, thereby reducing overall demand for vehicular traffic on local roads towards both Farnborough and Fleet as a result of the

proposed development. These proposed highway improvements will need to be the subject of a s278 Highway Works Agreement and comprise the following:-

Pedestrian and cycle improvements to:-

- (a) At the Range Road access as shown in principle on drawing 2403065-05 Rev.B, which involves the provision of a widened footway at Access 1 at the Ively Roundabout from Ively Road/Elles Road to enable safer access for pedestrians into Range Road within the proposed development;
- (b) East of the Ively Roundabout on Elles Road as shown in principle in drawings 2403065-07 Rev.B, which is the provision of a proper marked pedestrian/cycle crossing of Elles Road in the place of the current more informal road crossing provision that is currently a limitation on the use of the cycleway towards CTP from Farnborough Town Centre. The works proposed with this plan also propose some improvement to the width of the cycleway along Elles Road towards the Meadow Hall Roundabout;
- (c) Norris Hill Roundabout pedestrian and cycle improvements as detailed in drawing 2403065-04 Rev.C. These would involve upgrades in the vicinity of the existing crossing point at the west end of New Ively Road to provide a staggered signalised road crossing for cyclists and pedestrians to and from CTP from Fleet – where there is an existing security gate from Old Ively Road into CTP from the west side;
- (d) The existing footway/cycleway that runs north of Ively Road north of Ball Hill just outside the site west of the Ively Roundabout leading towards the Whittle Roundabout (i.e. running between Accesses 1, 4 and 2 respectively) be subject to maintenance, drainage and lighting improvements.

However, HCC Highways has stipulated that, in the event that the above highway works are found to be undeliverable, that an equivalent financial contribution amount be secured instead to be secured by Legal Agreement towards alternative pedestrian and cycling infrastructure on routes connecting the Development to Fleet and Farnborough, such measures to be consistent with, or supportive of, the principles and priorities set out within the Council's Local Cycling and Walking Infrastructure Plan (LCWIP) or any subsequent strategy.

HCC Highways additionally requires, to be secured by Agreement, the undertaking of various improvement works within the application site involving: (a) the upgrade of the existing bus stop at the Concorde Way (Access 2) to include a larger shelter, covered seating, and a real time information board; and (b) provision of a new bus stop at the Range Road access (Access 1) including shelter, covered seating, and a real time information board

HCC Highways has also requested, in consultation with National Highways, the imposition of a planning condition to require the submission, approval and implementation of an Operational Management Plan prior to the first occupation of each phase, or part thereof, of development, in order to set out details of the day to day operation of that phase of development inter alia including arrangements to servicing, deliveries etc; on-site parking and service management.

As will have been noted from the listing of HCC Highways' consultation response earlier in this Report, these measures are part of a wider package of s106 requirements also including an Active Travel Modes financial contribution, Travel Plan requirements and

fees, the securing of improvements to shuttle bus services to and from CTP; and also the imposition of a condition requiring the submission of a Construction Traffic Management Plan for each phase (or part thereof) of proposed development to build-upon the framework document **[Doc 13]** already submitted. These are set out further in following sections/paragraphs of the Highways Considerations below.

Bus Service Facilities : HCC Highways requires that the shuttle bus services serving CTP are upgraded as a further s106 agreement requirement. This would require the shuttle bus service to be secured and implemented in accordance with the proposed Public Transport Strategy for the lifetime of the development to include the follow improvements: (a) Increased shuttle bus frequency to 4 buses in the AM and PM weekday peaks; (b) provision of a lunchtime service to Farnborough town centre; (c) additional services to be provided to deliver the bus capacity needed to support the mode share targets set out in the proposed draft Framework Travel Plan; (d) ensuring the need for the shuttle bus service is reviewed regularly through the Travel Plan Monitoring Surveys to ensure patronage levels are catered for; and (e) incorporating two additional stops on the CTP shuttle bus service/route at Kingsmead in Farnborough and a proposed new bus stop on Range Road in addition to the existing stop on Concorde Road, serving the proposed expansion to Cody Technology Park, with passenger facilities including a shelter, covered seating, timetable information and street lighting.

Travel Plan : An amended draft Framework Travel Plan **[Doc 14]** has been submitted with the application (received 27 January 2026) and is a further way in which vehicular traffic demand as a result of the proposed development would be managed by encouraging usage of non-car travel modes. HCC Highways advise that further work is needed with this framework document before it can be approved by HCC, however this is not unusual with Travel Plans and it already requires that, in turn, detailed Travel Plans are created for each phase, or part thereof, of the proposed development to be adopted and implemented by the actual occupiers of the new commercial units. The finalised version of the Framework Travel Plan, and associated approval and monitoring fees, is to be secured as a planning obligation within the s106 Agreement and the associated fees payable to HCC.

Active Travel : In addition to off-site works to improve cycle and pedestrian access, the proposals would incorporate pedestrian and cycle links throughout the proposed development that are specified and mandated by the revised Design Code document **[Doc 8]**, in order to facilitate easy movement across the site, thereby providing better active travel permeability through the site. Whilst further consideration will need to be given to the design of routes through the development and the possibilities for creating better connections within and beyond the site it is considered that these are matters for the Design Requirements document and for detailed consideration at Reserved Matters stage.

In recognition of the need for the development to encourage and promote active travel, HCC requires a substantial Active Travel Modes financial contribution towards the delivery of pedestrian and cycle improvements, including identified LCWIP measures, between the proposed site and Fleet and Farnborough, amounting to:

a) £2,967,747.00 to be secured in the event that DZ1 comes forward as a mix of uses (i.e. as anticipated by the Applicants), or:

b) £3,524,602.00 to be secured in the event that DZ1 comes forward as primarily research and development uses to mitigate the increased employment density (and therefore transport impacts) of the development and promote sustainable modes of travel, but making an appropriate allowance for the possibility that the mix of uses that arising may be different from that currently envisaged by the Applicants.

HCC has been working in partnership with active travel charity, 'Sustrans', and local Borough and District authorities in developing Local Cycling & Walking Infrastructure Plans (LCWIPs) within Hampshire, including, currently in adopted form since April 2023, for Rushmoor, as set out in the Government's Cycling and Walking Investment Strategy (2017). LCWIPs enable a long-term approach (typically 10-year periods) towards developing local cycling and walking networks and form a crucial part of the Government's ambition to increase the number of trips made by walking and cycling. HCC see LCWIPs as a way to be aspiring and ready for future National funding opportunities to provide improvements in walking and cycling infrastructure, across the County.

It is considered that the CTP proposals are compatible with the objectives of the adopted LCWIP and, indeed, that the proposals would also secure the sort of improvements that are espoused by Active Travel England and requested by Hart DC. Subject to completion of an appropriate s106 Agreement with HCC in this respect it is considered that the proposals would make acceptable provision for active travel and accessibility.

HCC Highways has also requested that other provisions to encourage active travel mode use internal to the proposed development be design considerations at Reserved Matters stage, namely:-

- Improved pedestrian and cycle routes within the site to enable convenient travel to the development units from the CTP site entrances and between locations within the Property;
- Secure, covered cycle parking in excess of minimum local standards to encourage cycle commuting; and
- Facilities within development to help enable cycling, including changing rooms and showers.

These are all matters that mandated by the revised Design Code document **[Doc 8]**.

Parking Provision : Being in outline form, the proposals do not, at this stage, provide any details of parking provision and distribution within the proposed development. The provision of full details of parking provision, including the design of car parking areas etc are issues for consideration the Reserved Matters stage. Nevertheless, the Council needs to be satisfied at the outline stage that the proposed development would be provided with adequate on-site parking to meet the functional needs of the development and comply with the Council's adopted policies. In this respect the submitted Design Code document **[Doc 8]**, which is for determination at the outline stage, establishes the clear requirement that the detailed design of the development shall provide parking in full accordance with the Council's adopted Parking Standards existing as may exist at the time Reserved Matters submissions are under consideration [revised DC document Page 20 refers]. Earlier in the Commentary section of this Report the Quantum of Development being proposed has been considered and it is considered that the scale of development that is proposed given the areas of land involved are realistic and, as such, that it is considered that it would be possible to accommodate on-site parking in

each phase (or part thereof) of development within all DZs in full accordance with the Council's adopted Parking Standards. Albeit, in respect of DZ3 only, it is anticipated that this will require the use of a multi-storey car park. On this basis, it is considered that the submitted parking proposals provide an acceptable framework for parking provision to the Council's adopted parking requirements.

Internal Layout Design and Refuse Collection & Servicing : Refuse and servicing areas would need to be provided in the design of the layout of the proposed development. HCC Highways are satisfied that, through following the provisions of the revised Design Code document **[Doc 8]**, the internal layout design and geometry of the proposed development and the refuse and servicing arrangements would be acceptable.

Construction Traffic : It is long-standing Government policy and guidance that the various impacts of the demolition and construction phases of development cannot be taken into material account in determining planning applications. However, it is not considered unreasonable for the Council to have some influence on the conduct of the implementation stages of large developments such as CTP given the long period of time over which it is anticipated the works would take place. This would be in order to encourage considerate behaviour and working practices. In terms of potential highways impacts, it is considered that demolition and construction traffic relating to the proposed development would, in part, be mitigated through the effective phasing of the development works, which could limit the amount of the proposed development that would be taking place at any one time. Furthermore, it is considered that the routing of demolition and construction traffic to and from the sites, albeit using public highways, are matters that should be incorporated into the Construction Traffic Management Plan for the development that has already been identified to be secured by planning condition **[in framework form as Doc 13]**.

It is considered that the routing of demolition and construction traffic to and from the sites, albeit using public highways, are matters that should be incorporated into the requested Construction Traffic Management Plan for the development to be required for each phase, or part thereof, of the proposed development.

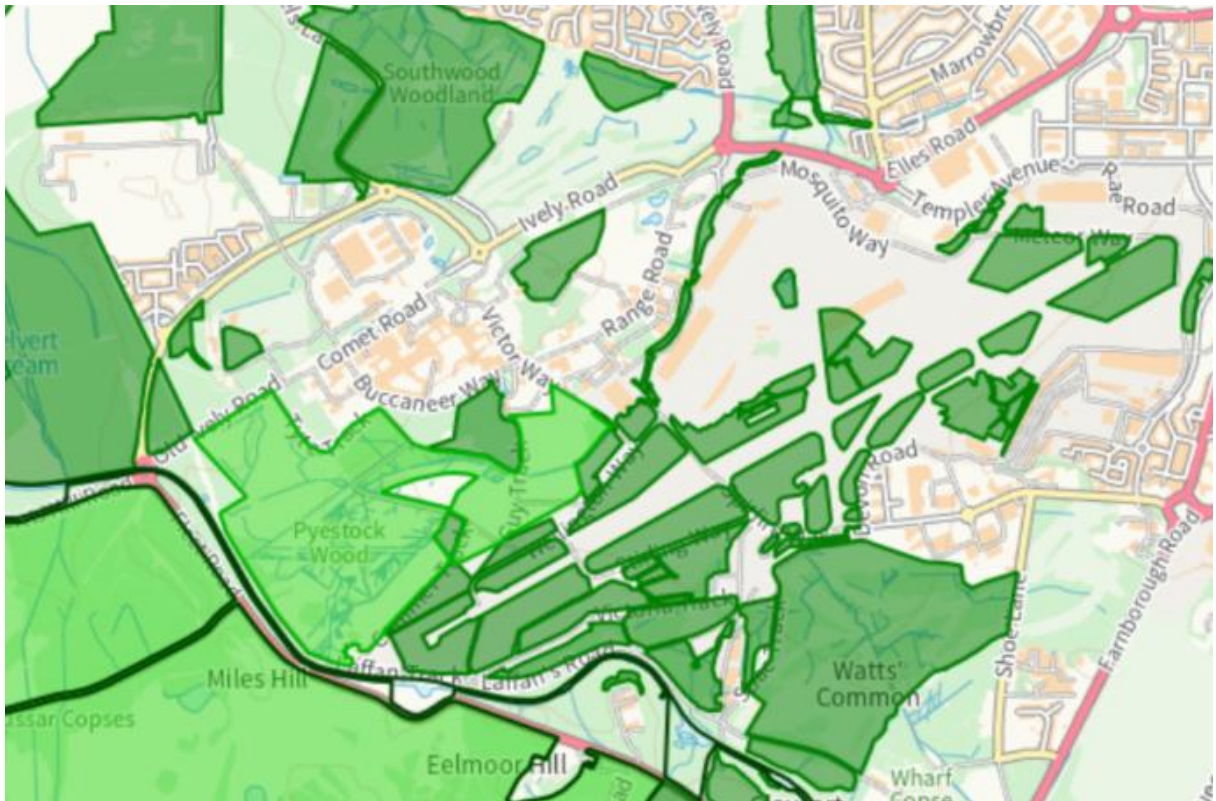
Conclusions of the Highway Considerations - Subject to the various s106 provisions and conditions that have been identified, it is considered that the outline planning permission would provide an appropriate and framework for the detailed design of the proposed development that would be acceptable in highways terms.

11. Impacts on Wildlife & Ecology/Biodiversity Net Gain -

General Context : The application site is situated effectively surrounded by land/sites designated with nature conservation interest that are variously of international, national and local importance - see plan below. The nature conservation sites situated closest to the application site are as follows:-

- Ball Hill Site of Importance for Nature Conservation (SINC) situated largely outside the application red-line between DZs 2 & 3.

- Eelmoor Marsh Site of Special Scientific Interest (SSSI) and, thereby, also a component part of the Thames Basin Heaths Special Protection Area (SPA) directly adjacent and south of DZ1 (part) and DZ4.
- A section of Eelmoor Marsh located centrally south of CTP South is also separately a SINC.
- Farnborough Airport SINC; and
- Basingstoke Canal SSSI.



Plan showing designated nature conservation sites within both Rushmoor BC and Hart DC surrounding the application site (situated within the area defined by Ively Road, Range Road, Victor Way, Buccaneer Way and Comet Road centrally on the plan) : Light Green is SPA and SSSI, Dark Green is SINC. Source Hart District Council on-line mapping.

As a consequence there are a number of layered nature conservation issues to consider with the current planning application that are comprehensively addressed by the Applicants with supporting documentation submitted with the application **[see Docs 15, ES2.11 and ES4.25-ES4.38 inclusive]** that is set out in the following paragraphs within this section of the Report.

Although some nature conservation sites directly border the application site, only a small part of DZ2 is designated as being with the Ball Hill SINC, this arises from a recent adjustment to the boundary of this SINC that was decided and confirmed only recently.

Habitats Regulation Assessment : The European Court of Justice judgement in 'People Over Wind, Peter Sweetman v Coillte Teoranta C-323/17' in April 2018 established the legal principle that a full appropriate assessment (AA) must be carried out for all planning applications that have the potential, alone or in combination, to have a significant impact

upon the nature conservation interest and integrity of European designated nature conservation sites : Special Protection Areas (SPAs) and SACs (Special Areas of Conservation). Furthermore, that the AA process cannot take into account any proposed measures to mitigate any likely impact at the assessment stage. This process, culminating in the Council's Appropriate Assessment of the proposals, is overall described as Habitats Regulation Assessment (HRA). Undertaking the HRA process is the responsibility of the decision maker (in this case, Rushmoor Borough Council) as the 'Competent Authority' for the purposes of the Habitats Regulations.

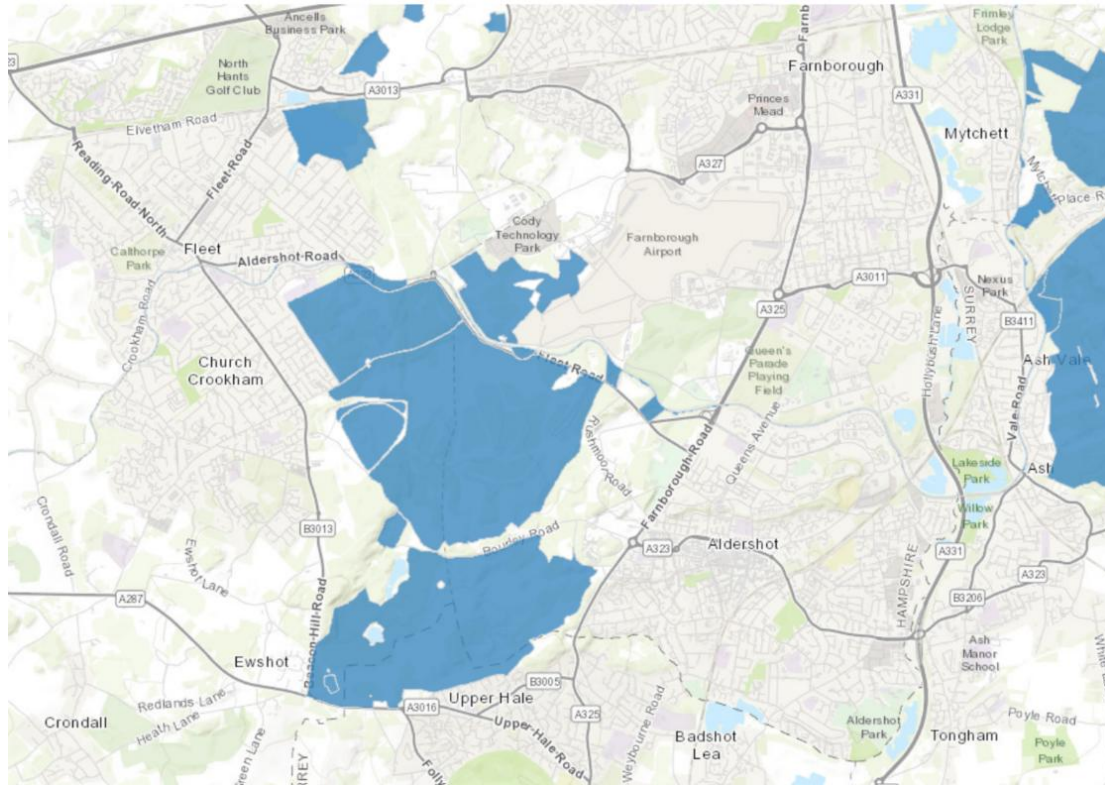
A 'shadow' HRA [**Doc 16**] has been submitted with the planning application which has been examined by the Council's Ecology Officer and has been subject to amendments and clarifications as a result of queries raised. In this respect Appendix 5 'Visitor Survey' now includes additional information regarding visitor survey methodology. The Applicants' Shadow HRA seeks to evaluate whether their proposed development is likely to have a significant effect on the conservation objectives and integrity of two European Sites (Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC [Special Area of Conservation]). The Council's Ecology Officer is, as a result of the amendments and clarifications received, content that the shadow HRA provides sufficient information for the Council to undertake its formal HRA.

The following potential impacts are identified by the shadow HRA from the ES for consideration and assessment that were scoped-in with the EIA Screening in consultation with the Council's Ecology Officer:-

- Disturbance effects resulting from recreational visitors;
- Air quality impacts – SO₂ and Ammonia (eutrophication and acidification effects);
- Increased atmospheric nitrogen deposition (Ndep) resulting from diesel back-up generators that are considered likely to be required for the proposed data centres in combination with emissions from road vehicle traffic;
- Increased atmospheric nitrogen oxides (NO_x) also arising from diesel generator emissions, also in combination with emissions from road traffic;
- Smothering of habitats due to deposition of particulates/dust arising from demolition and construction activity;
- Mobilisation of pollutants into the water environment of the SPA as a result of demolition/construction and operational phases of the proposed development; and
- Disturbance to qualifying bird species as a result of increased exposure to noise events over 69.9 LAmax dB. The ES (Chapter 9 : Noise) concludes that this has the potential to arise as a result of demolition and construction activity.

The following paragraphs comprise the Council's formal HRA in this case:-

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



Special Protection Area SSSI components (shaded blue) in closest proximity to the application site.

Source: Natural England on-line open data mapping.

Recreation Disturbance Effects : The bird populations and nests within the SPA are very prone to recreational disturbance, with birds vacating the nests if disturbed by members of the public. This leaves the young unprotected and increases the risk of predation. People exercising dogs, often off lead, increase the disturbance effect and its range; and dogs not only disturb the adults, but can also directly predate the eggs and young if they encounter the nests.

Assessment of potential recreational visitor impact on Thames Basin Heaths SPA is informed by the following documents:-

- Visitor Survey for Eelmoor Marsh SSSI, Adjacent to Cody Technology Park, author Tyler Grange, dated 30th September 2025, submitted as Annex 12 to Chapter 11 of the ES **[Doc ES4.36]**; and
- The Applicants' 'Shadow' Habitats Regulations Assessment, author Tyler Grange, dated 1st October 2025 **[Doc 16]**.

The shadow HRA draws the conclusion of no adverse effect on integrity on the qualifying bird features of the TBH SPA as a result of recreational visitor disturbance. The current extrapolated visitors per day is increased in accordance with the expected proposed (approximately 50%) increase in employees at CTP post-development. The proposed increase in employees expected to be present at CTP as a result of the proposed development (approx. 872 additional) represents the expected increase resulting from all proposed phases of new development across the full site. This expected increase in employees is modelled to translate to an increase in recreational visitors to the Eelmoor Marsh SSSI component part of the SPA adjacent to CTP within the range of 27-66

visitors per day on weekdays only. However, unlike most other component parts of the TBHSPA, the Eelmoor Marsh SSSI is not open to the general public and access is only accessible for recreation to employees of firms located within CTP. Furthermore, whilst there would be an increase in recreational visitors to Eelmoor Marsh, thereby increasing the risk of disturbance effects occurring as a result of the proposed development, overall visitor numbers of approximately 54-132 per day are considered relatively low in the context of the 1000s of visitors per day to the TBHSPA as a whole.

Chapter 11 of the ES [Doc ES2.11] (para 11.79) states; *“Access and management controls – the recreational impacts of the Proposed Development are limited by the secure nature of the Site, this is to be continued in the operational phase and is considered embedded, as are the existing access controls to Eelmoor Marsh SSSI which is only open during the day (gates between the Site and Eelmoor Marsh SSSI are locked at night)”*. The applicant intends to continue to apply existing controls on visitor access into Eelmoor Marsh and, as such, relies on these existing measures to draw a conclusion of ‘no likely significant effect’.

Nevertheless, for robustness, it is considered that it cannot be ruled-out that the recreational disturbance effects could overall be significant when considered in combination with the impacts of other developments within the sphere of influence (i.e. catchment) of the wider TBHSPA. Indeed, visitor surveys have shown that the visitor catchment area for the overall Thames Basin Heath SPA is 5km covering a wide area across North-East Hampshire, Surrey and parts of the former Berkshire, with any proposals for residential development alone within this catchment contributing to recreational pressure on the overall SPA amounting to a large overall quantum of potential recreational disturbance.

Air Quality Impacts : Heathland is prone to atmospheric nitrogen deposition (Ndep) due to increases in atmospheric Nitrogen Oxide (NOx) arising from hydrocarbon combustion, principally generated by road traffic. This has the effect of providing increased nutrient levels to the ground that encourage the growth of plant species that are not native to the heathland, which is characteristically nutrient deficient. Ndep and NOx are alternative ways of conceptualising the distribution of Nitrogen combustion products.

NOx critical level : Data and modelling presented by the applicant indicates that the process contribution of the proposed development for back-up diesel generator usage and traffic combined is locally above 1% of the NOx critical level for the relevant habitat types. However, it is appropriate to consider the spatial scale of the predicted above 1% process contribution on TBH SPA and the ecological functionality of the affected area. Natural England report NECR205 *“Small-scale effects: How the scale of effects has been considered in respect of plans and projects affecting European sites - a review of authoritative decisions”* (February 2016) states *“Where the spatial extent of the affected area is small then the risk to the integrity of the site needs to be approached in a reasonable and proportionate manner”*. Report NECR205 also states *“In the case of small-scale effects on a supporting habitat for a species, the decisions reviewed suggest it is the ecological functioning of that supporting habitat which is most influential”*. Furthermore, report NECR205 is unable to identify *“any formula or ‘rule-of-thumb’ that either a certain level (expressed in say square metres or hectares) or a certain proportion (expressed as a percentage) of loss or deterioration of habitat is to be regarded as a significant or an insignificant effect, or is or is not to be considered as an*

adverse effect on site integrity”.

The TBHSPA has a total area of 8274.72ha. As a worst-case scenario involving the proposed development containing 80 back-up diesel generators, the area of TBHSPA affected by an above 1% process contribution of NO_x critical level as a result of the proposed development is modelled as 8.7ha within the Eelmoor Marsh SSSI component adjacent to the application site. However, this represents 0.11% of the total area of TBHSPA overall that would be exposed to elevated process contribution of NO_x. Accordingly, it is considered that the presented data demonstrates that the Predicted Environmental Contribution remains significantly below, and does not exceed, the stated NO_x critical level of 30 µg/m³ for the TBHSPA within the 8.7ha subject to an above 1% critical level process contribution worst-case modelled for the proposed development.

It is also considered pertinent to consider that the most recently available ‘condition status’ survey or the Eelmoor Marsh SSSI (October 2020) undertaken by Natural England identifies all features and units of the SSSI as in ‘favourable’ condition. This includes the supporting habitats of the TBHSPA qualifying bird species. Accordingly, the ecological functioning of the SSSI and TBHSPA is meeting expected ecological condition and does not show any current obvious signs of habitat deterioration as may be expected as a result of elevated NO_x.

Therefore, having regard to the small-scale effect on supporting habitats, a Predicted Environmental Concentration far below exceedance of the critical level, a European site that is meeting its ecological function requirements for the relevant supporting habitats, it is considered reasonable and proportionate to conclude that modelled NO_x emissions predicted to arise as a result of the proposed development, will not have an adverse effect on the integrity of Thames Basin Heaths SPA in view of the site’s conservation objectives.

Ndep : Data shows that background Ndep levels exceed the recommended critical load for the relevant vegetation types found at Eelmoor Marsh and TBHSPA - modelling presented by the Applicants indicates that the process contribution of the proposed development for back-up diesel generator usage and traffic combined would be locally above 1% of the Ndep critical load for the relevant habitat types. However, again, it is appropriate to consider the spatial scale of the predicted above-1% process contribution on the TBHSPA as a whole and the ecological functionality of the affected area. The area of TBHSPA affected by an above 1% process contribution of Ndep critical load in combination with traffic emissions, is modelled as 5.2ha. This represents 0.06% of the total area of TBHSPA exposed to elevated process contribution of Ndep as a result of the proposed development. The process contribution of the proposed development is therefore considered relatively marginal when viewed in this context.

Again, it is considered relevant that the most recently available ‘condition status’ survey undertaken by Natural England for Eelmoor Marsh SSSI (October 2020) identifies all features and units of the SSSI as in ‘favourable’ condition. Current management of Eelmoor Marsh has a focus on effective grazing, which helps nutrient reduction. This management regime appears to be effective at maintaining favourable condition status and resilience to nitrogen air pollution, which is beneficial to the protected habitats and the species these habitats support.

Furthermore, it is noted that ES Chapter 8 (Air Quality) contains significant caveats regarding the assumptions made about back-up generator numbers, location, model and operation schedules because of the outline nature of the proposals; and that a worst-case scenario is tested. It is, therefore, considered that there is some likelihood that actual emissions into Eelmoor Marsh are likely to be lower than modelled when detailed proposals for the data centres come forward and detailed assessment of actual proposals can be assessed.

Calculations undertaken for the Rushmoor Borough Council Local Plan found that there will be no in-combination air-quality impacts on SPA habitats as a result of development in the Local Plan, including an allowance for 'windfall' housing developments. However, it is considered that it cannot be ruled-out that there would be overall significant in-combination air quality impacts upon the SPA associated with residential *and* other developments within 200m of the TBHSPA overall that will increase vehicle movements to above 1000 extra trips/day or exceed the Minimum Critical Load by over 1%.

Water Quality/Pollution Impacts : The Eelmoor Marsh SSSI is selected for wetland features which rely on maintenance of appropriate water quality and quantity of surface and groundwater, including permanent wet mire, sphagnum bog, lowland mire grassland and associated invertebrate fauna. However, no surface water drainage systems at CTP South currently drain into the Eelmoor Marsh SSSI and no new connection for drainage into Eelmoor Marsh is proposed. Accordingly it is not considered that the development would give to any additional risk of surface water pollutant contamination of Eelmoor Marsh SSSI. Additionally the Applicants clearly state at Para.3.20 of the shadow HRA **[Doc 16]** (and have since re-iterated this in response to specific query concerning this matter) that there will be no water abstraction of either groundwater or surface water sources to serve the proposed development (such as to provide cooling for the proposed data centres) that could depress the existing water table within the SSSI and, therefore, cause drought conditions. The Council's Ecology Officer therefore concludes and agrees with the Applicants that no likely significant effect on habitats supporting the bird features of Thames Basin Heaths SPA would arise due to adverse impacts on surface water quality and quantity.

Noise : The shadow HRA **[Doc 16]** and Chapter 9 of the ES **[Doc ES2.9]** (specifically para.9.126) conclude a maximum demolition and construction noise level of 102dB and a post-development operational noise level of 88.6dB as the worst-case scenarios with a closest working location to the boundary of the SPA. In this respect, it is considered that the CTP proposals give rise to noise impacts potentially affecting the SPA that are materially different from those arising from aircraft noise arising from the operation of Farnborough Airport. Firstly, the noise sources are ground-based with likely localised impacts upon the margins of SPA land arising from direct proximity, whereas aircraft noise impacts are likely to affect wider areas of SPA land. Secondly, the impacts are likely to be intermittent and occur for a finite temporary periods of time only that are considered to be capable of being identified and appropriately mitigated for and, as such, can be subject to conditions to this effect.

Suitable nesting habitat to support the three qualifying bird species of the TBHSPA is present across Eelmoor Marsh SSSI up to the boundary with the proposed development site. A threshold level of 69.9dB L_{Amax} has been accepted previously by the Council and Natural England as a threshold above which noise levels would cause unacceptable

disturbance to birds within the TBHSPA because this is considered to be the point at which noise would prompt behavioral changes in the birds, most notably prompting them to fly away from their nests and giving rise to the same impairment to breeding success as recreational disturbance effects. In this respect, a further Natural England consultation response comment for 23/00794/REVPP (Farnborough Airport) dated 5th November 2024 states:

“A noise level at or above 69.9db Lmax is considered the threshold for negative behavioural response in birds. Loud noise events are considered those that reach or exceed a noise level of 69.9db Lmax”.

As a result, NE requested either:- *“Evidence to demonstrate beyond reasonable scientific doubt that the modelled increase to noise pollution, via frequency of noise events at or above a 69.9 decibel threshold, will not lead to an adverse effect on integrity of the Thames Basin Heaths SPA Annex 1 qualifying bird species – Nightjar, Woodlark and Dartford Warbler”, or*

“Appropriate mitigation or compensation measures [be] secured to offset any adverse effects, including appropriately funded management and monitoring, and details of how the measures will be secured for the lifetime of the development.”

[Officer Note: The 69.9dB L_{Amax} impact threshold is taken from research paper M. Wright, P Goodman, T Cameron 2010: ‘Exploring behavioural responses to shorebirds to impulsive noise.’ Uni of Leeds report to Wildfowl and Wetlands Trust, ‘Wildfowl’ 60:150-167).]

The Applicants’ amended shadow HRA uses 70dB as the maximum permissible noise threshold, which is considered to be insignificantly different from the 69.9 dB threshold used by the EA and the Council previously in considering noise impacts upon the SPA. On this basis, noise modelling results presented within Chapter 9 (Noise & Vibration) of the ES reflects a worse-case scenario for noise emissions that would be moderate adverse and arise temporarily during the demolition and construction phase of development, but only likely in respect of those portions of the Development Zones that directly adjoin the boundary with Eelmoor Marsh; i.e. DZs1 and 4 because noise levels reduce with increased separation distances. Nevertheless, it cannot be ruled-out that there could be overall significant in-combination noise impacts upon the SPA.

Dust Emissions and SO₂ & Ammonia (eutrophication and acidification) Effects :

Both of these have the potential to result in a deterioration of habitats supporting the qualifying bird species by damaging and compromising the growth of heathland plants. However, air quality in these respects in Rushmoor is well below the levels that would trigger Air Quality Management Area intervention. Further, it is not anticipated that SO₂ and Ammonia emissions are likely to be emitted from the proposed development such that it is considered that no likely significant effects would arise in this respect. The Council’s Ecology Officer has accepted these findings following clarification of the basis on which these conclusions were reached in respect of the ES. In respect of dust emissions, there is considered to be potential for these to occur temporarily as a result of the demolition and construction phases of the development, most likely in respect of the development of DZs1 & 4, since these are situated the closest to Eelmoor Marsh.

Thursley, Ash, Pirbright and Chobham Common SAC : Due to the substantial separation distance of the proposed development to this other European site to the east

side of Farnborough it is considered that no likely significant effects to the integrity and qualifying features of this SAC would arise from the proposed development.

The proposed development is a phased new-build re-development of up to 143,000 sqm of flexible use employment floorspace anticipated to be built-out over a period of at least 8 years. The application is expressed in outline form with all matters except the means of access reserved for future consideration; and seeks approval of control documents comprising Parameter Plans and a Design Code document **[Doc 8]** at this stage. The application site is situated immediately adjoining the Eelmoor Marsh SSSI, which is a component part of the Thames Basin Heaths SPA. As a consequence, a number of potential adverse impacts upon this part of the SPA absent mitigation have been identified through a screening process as likely to have effects upon the SPA in respect of increased recreational pressure, air quality, and noise and dust emissions during the demolition and construction phases of the proposed development. The proposed development is neither connected to, nor necessary to the management of, the Thames Basin Heaths SPA; albeit Eelmoor Marsh is within the ownership, control and management of the Applicants.

On this basis it cannot be ruled out by the HRA screening process that the proposals would not, alone or in combination, lead to significant effects on the ecological integrity and nature conservation interest of a European site (i.e. the Thames Basin Heaths SPA). It is therefore necessary to proceed to Appropriate Assessment.

Appropriate Assessment under Regulation 63(1) of the Habitats Regulations : The retained South East Plan Policy NRM6 and adopted New Rushmoor Local Plan (2014-2032) Policy NE1 (Thames Basin Heaths Special Protection Area) state that; *“New development which is likely to have a significant effect on the ecological integrity of the Thames Basins Heaths Special Protection Area (SPA),....., will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.”*

If there are any potential significant impacts upon the Thames Basin Heaths SPA, the applicant must suggest avoidance and/or mitigation measures for consideration with the Appropriate Assessment. The Applicant must also provide details that demonstrate any long-term management, maintenance and funding of any such solution. These requirements must be met to the satisfaction of Natural England and Rushmoor Borough Council (the Competent Authority) before the point of decision of the planning application.

The Applicants' shadow HRA document **[Doc 16]** sets out draft proposals for a range of mitigation measures which are considered in context as follows:-

Mitigation for Recreational Disturbance : It is considered that the in-combination impacts of other development, largely residential schemes within the SPA catchment, are neutralised (and thereby addressed) by avoidance and mitigation measure schemes financed by s106 financial contributions. In the case of the proposed development in isolation it is considered that recreational disturbance effects can be, as they are now, minimised through the continuation of the on-going management and very restricted visitor access which, indeed, also maintains this SSSI component-part of the SPA in favourable condition. In this respect, in addition to maintaining or possibly alternatively

re-casting the Obligations within Schedule 3 of the 1995 s299A Agreement concerning the retention, maintenance and management of the Eelmoor Marsh SSSI, the Council's Ecology Officer recommends that the various mitigation measures proposed by the applicants to reduce risk of recreational disturbance from existing and new recreational visitors be amalgamated into a Visitor Access & Monitoring Plan (VAMP) to be required as a condition of the outline planning permission based on, but not limited to, the following measures:-

- Management and retention of Eelmoor Marsh vegetation (such as Gorse) adjacent to paths, in order to encourage screening of the most heavily used paths and, indeed, to discourage people from wandering off these paths;
- Provision/renewal of signage and information boards, potential closure of some access routes, and discouragement of walkers leaving footpaths or stopping in particular locations - especially within the nesting season;
- Continuation of the 'no dogs' policy;
- Establishment of alternative accessible natural greenspace within the development site to retain recreational visitors within the Technology Park - in effect the creation of mini- SANGS;
- Continued monitoring of both visitor numbers and relevant bird population/nesting sites within the SSSI; and
- Contingency actions to be taken should adverse effects upon the breeding bird population be identified.

Mitigation for Air Quality Impacts : The most significant effects identified in this respect without avoidance and mitigation measures arise from dust emissions during demolition and construction; and also from the potential use and assumed installation and operation of back-up diesel generators for the proposed data centres. The shadow HRA rules out impacts resulting from construction phase dust emissions on Thames Basin Heaths SPA concluding 'no likely significant effect' on the basis that these impacts can be avoided through embedded mitigation measures secured via the implementation of a CEMP; as set out in paragraph 8.84 of Chapter 8 (Air Quality) of the ES **[Doc ES2.8]**, which in turn refers to Annex 3 Construction Dust risk Assessment **[Doc ES4.11]**.

The impacts arising for human receptors from dust emissions have already been considered earlier in this Report and it has been concluded that this can be the subject of specific avoidance and mitigation measures for dust emission control within Construction Environmental Management Plans (CEMPs) to be submitted for consideration at Reserved Matters stage. In respect of back-up generator usage with data centres, exhaust fumes would arise only when the back-up generators are in use, which is considered most likely to arise as a result of the periodic maintenance and testing required for resilience assurance. However, it is considered that it is possible that alternatives to use of diesel generators may arise, such as battery back-up power systems and/or even use of renewable energy back-up power systems. Additionally, in the event that diesel generators were to be used, it is considered that management measures could be required by condition to ensure that back-up generator testing activities are undertaken on a staggered basis across the Technology Park to avoid concentrations of such activity taking place. The Council's Ecology Officer recommends the following specific additional avoidance and mitigation measures for air quality

issues:-

- Continuation of the close management and maintenance of Eelmoor Marsh habitats in favourable condition - with continued focus of nutrient reduction measures to mitigate the effects of Nitrogen deposition; and
- Details required to be submitted with Reserved Matters submissions to demonstrate how those detailed proposals have sought to reduce N_dep critical loads (1%) within Eelmoor Marsh as a result of any proposed plant and machinery that emits exhaust fumes to be installed, including its proposed location, specification and any necessary mitigation measures to manage and minimise emissions. In this respect, whilst there has been a focus of consideration on the potential for installation of back-up diesel generators with the proposed data centres, it cannot be ruled out that other emitting plant and machinery may be used that also emits exhaust fumes to the same potential effect.

Mitigation for Noise Impacts : is identified as most likely to generate significant disturbance effects to the bird species relevant to the SPA temporarily during the demolition and construction phases of the proposed development only. The impacts of noise nuisance on human receptors has already been considered earlier in this Report with the conclusion that appropriate measures would be incorporated into CEMPs to be submitted and considered at Reserved Matters stage and it is considered that they are also pertinent to an extent in respect of the consideration of noise impacts upon the SPA. In this respect the Council's Ecology Officer has considered the avoidance and mitigation measures indicated by the Applicants and recommends the following additional measures:-

- Details to be required to be submitted with Reserved Matters submissions to demonstrate and specify how those detailed proposals would bring noise levels at the boundary with Eelmoor Marsh at or below 70dB to be implemented in full prior to commencement of any works on site which may result in noise generation; together with noise monitoring and contingency measures in the event that the 70dB threshold is exceeded. It is anticipated that the provision of a substantial hoarding fence on the margin of the development site adjoining Eelmoor Marsh would go some way towards achieving the required noise reduction with few, if any, other measures required on those development plots that do not adjoin the SSSI.

Water Quality Impacts : On the face of the submissions and subsequent clarification on this specific point, there would be no drainage from the proposed development directed into Eelmoor Marsh, and no water abstraction as a result of the proposed development generally. These matters would be subject to conditions. In any event, the Environment Agency is the licencing authority in respect of water abstraction in any event.

Conclusions of Appropriate Assessment : On the above basis, the Council are satisfied that it is reasonable and proportionate to conclude that the applicants can satisfactorily mitigate for the impact of their proposed development on the integrity and nature conservation interest of the Thames Basin Heaths SPA in perpetuity in compliance with the requirements of New Rushmoor Local Plan Policy NE1. Accordingly, it is considered that planning permission can be granted for the proposed development on SPA grounds.

Site Specific Protected Species : The Council has no role or jurisdiction in the enforcement of protected wildlife legislation. Nevertheless, in the context of land use planning, Local Plan Policy NE4 (Biodiversity) seeks new development to avoid significant harm to biodiversity and, if not possible, to ensure that adequate mitigation is proposed that clearly demonstrates that there would be no adverse effect on the conservation status of priority species. This policy states, inter alia:-

“Development proposals will be permitted if significant harm to biodiversity ... resulting from a development can be avoided or, if that is not possible, adequately mitigated such that it can be clearly demonstrated that:

1. *There will be no adverse effect on the conservation of priority species*
5. *There will be no loss or deterioration of a priority habitat type, including irreplaceable habitats; and*
6. *There will be no adverse effect to the integrity of linkages between designated sites and priority habitats.”*

Additionally, Paragraph 175 of the National Planning Policy Framework (2021) (NPPF) explains that if significant harm to biodiversity cannot be avoided, mitigated or compensated for then permission should be refused. Government Circular 06/2005 (Biodiversity and Geological Conservation) Paragraph 99 states that:-

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

Circular 06/2005 appended in full to the NPPF states that the use of planning conditions to secure ecological surveys after planning permission has been granted should only be applied in exceptional circumstances. British Standard BS42020:2013 advises that circumstances may be ‘exceptional’ where *“original survey work will need to be repeated because the survey data might be out of date before commencement of development”*. The time period within which ecological survey data becomes outdated varies depending upon the mobility and habits of the particular species concerned, but also depending upon what, if anything, was found with previous surveys. Noting the long timeframe for this proposed development and the ‘outline’ nature of this current submissions, it is there considered appropriate and reasonable that further ecological survey works be conditioned to be undertaken and submitted with Reserved Matters applications when they come forward should previous survey work have become out-dated. Best-practice guidance in this respect is provided by the Chartered Institute of Ecology and Environmental Management (CIEEM).

In the preparation of the current outline planning application detailed Ecological Surveys of the application site and surrounding habitats have been undertaken on behalf of the Applicants in order to assess both the current ecological condition of the application site and the potential impacts of the proposed development. These have been prepared by

qualified ecological consultants. The following paragraphs set out the findings by species or species group:-

Badgers [Doc ES4.25]: Badgers are specifically protected by the Protection of Badgers Act 1992. They are highly mobile and excavate new setts readily. Active badger setts are identified within the red-line boundary of the application site within DZs 1, 3 & 4; and survey work confirms the general presence of badgers across the Cody TP site. Development within DZs 3 & 4 are intended to be brought forward in later phases accordingly the Council's Ecology Officer accepts that it is appropriate that detailed surveys for DZs 3 & 4 are undertaken closer in time to when these DZs are due to come forward for development; i.e. to be submitted for consideration with Reserved Matters applications. They also advise that the Applicants will need to secure appropriate protected species licensing for badgers for any setts that need closure and, indeed, that the Applicants should have regard to the need to provide replacement setts in an appropriate location where closure of a main sett is required. Additionally, further surveys will be required prior to submission of Reserved Matters applications to identify any new active setts that have been excavated since the original surveys were completed.

The Ecology Officer confirms that a condition be imposed at this stage to require that development be undertaken in accordance with the recommendations set out Section 3 of the submitted report 'Badger Survey Methodologies and Results'.

Bats : are protected under the Wildlife & Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2018, which apply to all bat species. Bat activity surveys and bat roosting surveys submitted as Annex 2 and 3 to Chapter 11 of the ES [**Docs ES4.26 & ES4.27**] are all considered appropriate in scope and methodology. The Ecology Officer advises that the activity survey results should be used to inform the identification and protection of dark corridors across the development site to enable foraging and commuting for nocturnal species and inform the development of a sensitive external lighting strategy. This is codified with requirements to be met in the revised Design Code document (January 2026) at Page 15.

Bat roost surveys identified a bat roost within tree T31, identified as inactive at time of survey and, as such, this tree should be subject to appropriate survey effort in line with best practice prior to any works commencing that may adversely impact an active roost at this location. Buildings B20 and B26 were also identified as hosting a active roosts. These roosts appear to be low status, although the bat species is not characterised. Since both of these buildings are proposed for demolition such that any roosts present will be lost, the Ecology Officer advises that a protected species licence will be required from Natural England will be necessary prior to the commencement of any demolition works. Further works must progress only in accordance with the methodology set out within the approved mitigation licence. The Applicants are aware that it is likely that further repeat surveys will be required by Natural England prior to grant of a licence.

Breeding birds : The Breeding Bird Survey Methodology and Results report, submitted as Annex 4 to Chapter 11 of the ES [**Doc ES4.28**], confirms the likely absence from the development site of the Special Protection Area qualifying species (Dartford Warbler, Nightjar and Woodlark). This is unsurprising since the application site itself would not appear to provide appropriate habitat to support these species and, of course, the adjacent Eelmoor Marsh SSSI does. Nevertheless, surveys identify the development site as having 'local importance' for birds more generally, presumably on account of the

existing CTP South buildings and landscaped surroundings. Accordingly, the development should proceed in accordance with best practice methodology to avoid, mitigate and compensate for adverse impacts on the local bird population.

Great Crested Newts (GCN) : The Great Crested Newt Surveys Methodology and Results report submitted as Annex 5 of Chapter 11 of the ES [**Doc ES4.29**], is considered appropriate in scope and methodology and identifies GCN as likely absent from the development site. Accordingly, the Ecology Officer has advised that they do not consider GCN to be a constraint to development in this case. The applicant is advised that unidentified GCN may still present. Nevertheless, as an informative, if a GCN is seen, work should cease immediately and advice sought from Natural England or a qualified specialist in order to avoid contravention of protected species legislation.

Hazel Dormice : Similarly, the Hazel Dormouse Survey Methodology and Results report submitted as Annex 6 of Chapter 11 of the ES [**Doc ES4.30**], is considered appropriate in scope and methodology and identifies Hazel Dormice as likely absent from the development site such that they are also not considered a constraint to development. However, since Hazel Dormice may still be present, it is considered appropriate to use an informative to remind the Applicants that, should a Hazel Dormouse be seen, work should cease immediately and advice sought from Natural England or a qualified specialist in order to avoid contravention of protected species legislation.

Reptiles : The Reptile Survey Methodologies and Results report submitted as Annex 7 of Chapter 11 of the ES [**Doc ES4.31**], is considered appropriate in scope and methodology and identifies the presence of 4 species of reptile within the proposed development site. In this respect, the confirmed presence of Sand Lizard will require a Protected Species Licence to be obtained from Natural England prior to any works that may disturb, kill or injure this species, in order to avoid breach of protected species legislation. The Ecology Officer advises that works must be undertaken only in accordance with the methodology specified within the mitigation licence.

Significant populations of three more common reptiles (large Common Lizard population, medium Slow Worm population and small Grass Snake population) also identify the site as a 'key reptile site'. Accordingly, the Ecology Officer advises that, prior to the commencement of works (including demolitions and vegetation clearance), the Applicants should submit to the Council for approval in writing, an appropriately detailed Reptile Translocation Plan in respect of the 3 more common reptile species present. Any proposed translocation site should have regard to the existing reptile population present at that site and whether the site can accommodate the influx of new individuals translocated in.

Invertebrates : The Terrestrial Invertebrates Methodologies and Results report submitted as Annex 9 of Chapter 11 of the ES [**Doc ES4.33**], is considered appropriate in scope and methodology. The species diversity and conservation status of the invertebrate assemblage is identified as being of national importance. The grass/heath mosaic at survey locations by Victor Way are identified as hosting a particularly diverse invertebrate fauna. The high species diversity and high number of species with conservation status reflects the habitat diversity present at site and connectivity to optimal habitats in the immediately adjacent SSSI environment. The Ecology Officer advises that development works should seek to retain and enhance the habitat mosaics identified in this Report as particularly important and ensure that functional habitat corridors are maintain between on-site habitat mosaics and similar adjacent habitats.

Indeed, the applicant should ensure that habitat creation and compensation measures proposed (for example under Biodiversity Net Gain) has appropriate regard to retaining and enhancing habitat mosaics valuable to the on-site invertebrate population.

Other Site Specific Ecology Considerations :

External Lighting : The applicant has submitted an External Lighting Strategy [**Doc 11**]. The site is known to host legally protected nocturnal species which are vulnerable to disturbance due to excess artificial lighting (active bat roosts, badgers, and Nightingale known to nest adjacent). The Council's Ecology Officer has recommended that the proposed development should result in no net increase in external artificial lighting in compliance with protected species legislation and the recommendations in BCT & ILP (2023) Guidance Note 08/23 '*Bats and artificial lighting at night. Bats and the Built Environment*' : Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby, including, where possible, identified dark corridors. Any identified dark corridors should be connected and functional across the site; and light spill at these corridors and adjacent site areas of retained / created vegetation should be at or below 1.0 lux. Bulbs of warm white below 2700k only should be installed. In this respect, the revised (January 2026) Design Code document establishes design controls in respect of external lighting at Page 15.

Furthermore, it is considered that details of external lighting can be required to be provided with Reserved Matters submissions applications for consideration in detail; including whether the external lighting proposals are informed by ecological input and accompanied by appropriately detailed isolux models that demonstrate, where possible, that dark corridors are maintained and/or created both at ground level and at vertical heights relevant to bat foraging and commuting.

In addition to Policy NE4, Local Plan Policy NE2 (Green Infrastructure) requires that development provides green infrastructure features within the development and maximises opportunities for improvement to the green infrastructure network, including restoration of fragmented parts of the network. This approach is supported by the NPPF.

Cove Brook : is a Main River and is therefore a Habitat of Principal Importance. It is also identified as a Site of Importance for Nature Conservation (SINC), immediately downstream of Farnborough Airport and, indeed, of the application site. The Council has a statutory obligation under the Natural Environment and Rural Communities Act 2006, to conserve and enhance the Brook. The Council's Ecology Officer therefore advises that as a condition of planning consent, the Council should require the applicant to submit for approval in writing, a suitably detailed document that sets out demonstrably effective measures to avoid deterioration of drained surface water entering the Cove Brook along with monitoring and mitigation measures to ensure that quality of water is maintained. In this respect it is considered that the submitted revised Design Code document [**Doc 8**] mandates a number of design requirements relating to 'blue infrastructure' on Pages 22 and 27 in this respect.

Basingstoke Canal SSSI : As with the Eelmoor Marsh SSSI, the Canal SSSI is also selected for wetland features that rely on maintenance of appropriate water quality and quantity of surface and groundwater, including aquatic macrophytes and associated invertebrate fauna. Accordingly, this SSSI is also potentially impacted by water pollution and/or drought effects (should any water abstraction take place) as a result of the proposed development. However, on the same basis as with the Eelmoor Marsh SSSI,

it is considered that there is no pathway for a likely significant effect in terms of water pollution and no water abstraction is to take place. As such, the Council's Ecology Officer concurs with the Applicants' submissions that no likely adverse impacts on the wetland features of the Basingstoke Canal would arise.

Farnborough Airport SINC : relates to a multitude of areas of species rich grassland within the perimeter of the Airport. It is subject to a site-specific management regime. Despite its proximity to the current application site it is considered that there are no likely significant effects that arise as a result of the development proposal because any effects would be isolated from this nearby SINC.

Ball Hill SINC : SINC's are selected by formally convened panel to a suite of both local and national Local Wildlife Site criteria. Selection criteria have regard to habitats and species present, identify those which are of particular rarity and local value; together, where relevant, with consideration of other supporting issues such as educational/recreational opportunities.

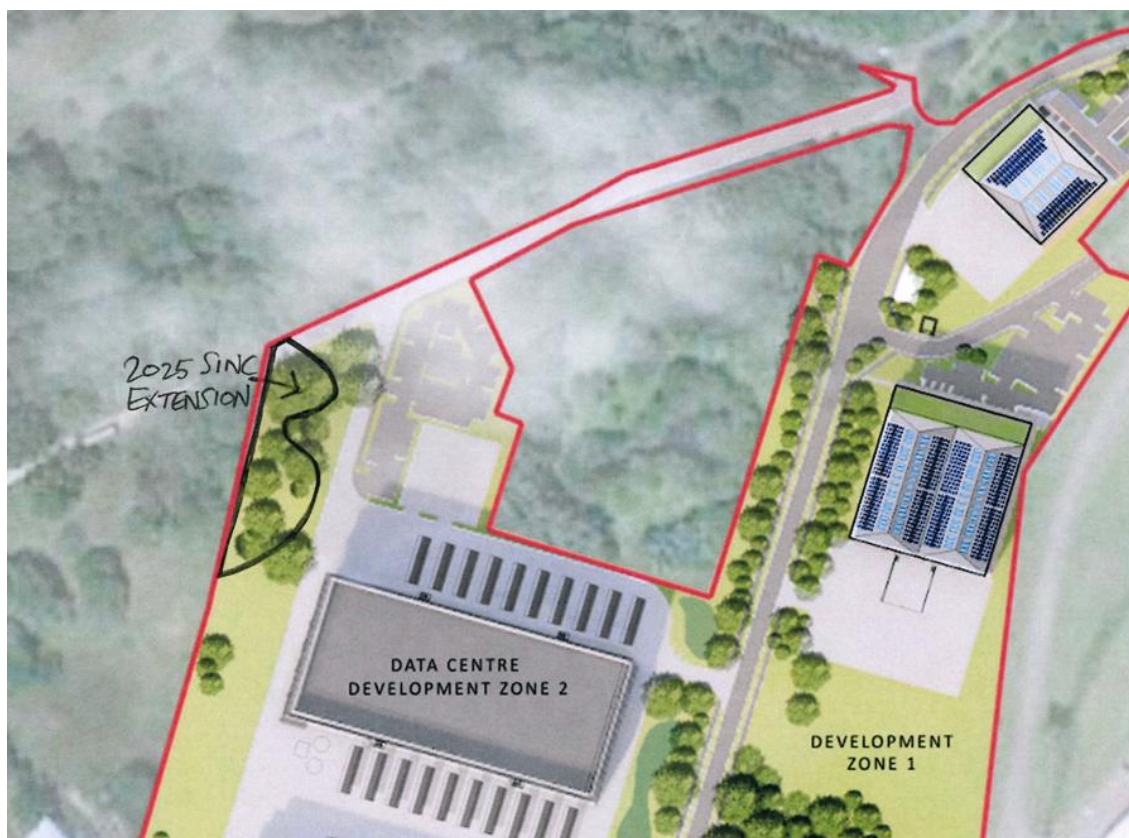
The Ball Hill SINC was subject to detailed botanical survey by the Hampshire County Council Ecology Team, in October 2023 as part of a rolling survey programme undertaken on an approximate 10-year cycle at the request of Rushmoor BC. This enables Rushmoor BC to keep an eye on our SINC's, identify those that need management support and ensure that our suite of SINC's reflects accurate conditions on the ground. Although there is no statutory protection for SINC's per se, they receive local planning policy protection with adopted Local Plan Policy NE4 (Biodiversity'), which requires that "development proposals will be permitted if significant harm to biodiversity ... resulting from a development can be avoided or, if that is not possible, adequately mitigated such that it can be clearly demonstrated that:... 4. There will be no adverse effect to locally designated sites".

Following the 2023 survey, the Panel chose to review both the boundary and species relevant to selection of the Ball Hill SINC. Specifically, the panel assessed whether to change the boundary to exclude a developed area in west from SINC; and add a section of willow wood to east. The Panel met in February 2025 and proposed amendments were accepted on 30th June 2025. The revised boundary extends the boundary of the SINC in the north east corner to include an area of wet willow woodland and, as a result, takes the SINC boundary within the red-line of the current application site where some development is proposed. The following plan shows the extent of the overlap of the extended SINC with the application site:-



Extract of Plan showing the Ball Hill SINC boundary including the extent of the 2025 extension that overlaps with the application site : Not To Scale : Source : HBIC

In this respect it can be seen that the area of land within the application site that is designated as SINC is small. This corresponds to a small marginal part of DZ2 that is wet woodland and is shown by the Illustrative Masterplan to be retained as a stand of trees adjacent to the vehicular access into the data centres proposed for DZ2 and adjoining an existing hard-surfaced vehicular access from Access 4 (Ively Gate: see annotated extract of the Illustrative Masterplan below:-



**Extract of Illustrative Masterplan showing approximate location of 2025 Ball Hill SINC extension :
Not To Scale**

Although there is no legislative protection for SINC, it appears that the Applicants anticipated the extension of the SINC in formulating their plans for DZ2 such that it is considered unlikely that there would be any need for development to be undertaken within the SINC. Indeed, the revised Design Code document **[Doc 8]** has mandatory requirements for the retention and/or provision of significant ecological buffers with the SINC and for no building to be sited within the SINC: DZs 1 & 2 are identified as Character Area 2 within the revised Design Code document; Pages 34 and 24 respectively. Together with the recommended s106 requirement to be secured for the Ball Hill SINC to be retained, maintained and managed, it is considered that the proposals would have no material and adverse impact upon the extended Ball Hill SINC and would, indeed, secure its long-term future as a nature conservation site.

Biodiversity Net Gain

The Environment Act 2021 introduced a statutory footing for securing measurable net gains for biodiversity, requiring a 10% minimum uplift post-development. These requirements took effect from April 2024 and, as such, it is necessary for the proposed CTP development to comply with the BNG Regulations.

The BNG Regulations require developers to measure habitat value using the DEFRA Statutory Biodiversity Metric (this is a tool which is used to assess habitat type, condition, distinctiveness, and location to calculate biodiversity unit value for existing and proposed situations to calculate the BNG units required) and secure enhancements to reflect the habitat categories in the BNG Metric for at least 30 years. Developers are, before first implementation of development, required to submit a Biodiversity Gain Plan detailing how the 10% increase is to be achieved. BNG loss compensation can be delivered on-site or off-site. In specifying their proposals for BNG delivery developers must follow a hierarchy, starting with seeking to avoid habitat loss in the first instance, followed by compensating for habitat loss on site, before, only then, being able to opt for off-site compensation, first adjacent to or near the application site and secondly more remote compensation sites that must be registered as such. Irreplaceable habitats, by their nature, cannot be compensated for and, as such, it is expected that the developers' proposals would seek to retain such habitat. Proposed habitat loss of higher distinctiveness is also subject to stricter consideration of whether or not this can be feasibly and adequately compensated for off-site. If actual appropriate habitat loss compensation cannot be achieved on- or off-site following the hierarchy, a developer can then proceed to purchase statutory biodiversity credits instead.

Local Planning Authorities must take into account how the Biodiversity Gain Hierarchy has been applied and, if it has not been applied, the reason for that, or absence of a reason, when determining whether or not to approve the Biodiversity Gain Plan. If it is decided not to approve the Overall Biodiversity Gain Plan the LPA must give reasons for that stating the elements of the plan that are relevant to the determination.

The consideration of BNG requirements with outline planning applications requires some modification to the standard approach to BNG delivery. This is because the grant of outline planning permission, especially with large developments such as proposed with the current application, involve the reservation of matters for subsequent approval (i.e. the 'Reserved Matters') and this usually has the effect of (whether or not that was what the developer intended) requiring or permitting development to proceed in phases. Further, large and phased developments are usually implemented over a long period of time where full (or even any) details of all phases may, as in this case, not be known at the time of the outline planning permission being granted. As such, the precise nature and extent of habitat loss is not yet known, making the determination of the nature and extent of BNG compensation also unknown. Clearly, in such circumstances, the standard BNG approach of locking-in specific BNG delivery at the point of granting permission is not possible.

Nevertheless, a phased development must still demonstrably meet the biodiversity gain objective of at least 10% net gain, so a different approach for meeting the biodiversity gain condition is allowed within the BNG Regulations. In this respect, the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 modifies the general biodiversity condition for planning permissions which are phased development. Instead of the standard approach for the Biodiversity Gain Plan:

- an **Overall Biodiversity Gain Plan** must be submitted to and approved by the planning authority before any development can begin; and
- a **Phase Biodiversity Gain Plan** for each phase must be submitted to and approved by the planning authority before the development of that phase can begin.

The purpose of the Overall Biodiversity Gain Plan is to confirm that there is a clear upfront framework for how it is envisaged that the biodiversity gain objective of at least a 10% gain could be met across the entire development. Then each Phase Biodiversity Gain Plan will subsequently set out a phase's contribution to biodiversity net gain and confirm progress towards the overall biodiversity gain objective for the development once clear proposals for each phase have been developed.

The Applicants' submissions in respect of BNG comprise:-

- ES Chapter 11 (Ecology and Biodiversity) [**Doc ES2.11**] and associated technical and supporting appendices, in particular comprising Habitat Assessments and Biodiversity Net Gain Strategy at Annex 8 to the ES [**Docs ES4.25-ES4.37 inclusive**];
- A Statutory Biodiversity Metric spreadsheet [**Doc 5**];
- An Outline Habitat Management and Monitoring Plan (HMMP) dated 5th November 2025 [**Doc 4**]; and
- Rushmoor Borough Council BNG Statement Form dated 2nd October 2025 [**Doc 3**].

The Council's Ecology Officer confirms that the submitted BNG Statement Form is appropriately completed in line with Council requirements; and all habitat surveys are comprehensive and undertaken in accordance with best practice. The detailed National Vegetation Classification (NVC) survey of the lowland heath area is also considered particularly helpful. As such, the application submissions provide a clear evaluation of current baseline habitat distinctiveness and condition, which is also clearly mapped (Baseline Habitat Plan 16727/P03a). The Statutory BNG Metric is also appropriately completed.

Outline Habitat Management & Monitoring Plan: The applicant has submitted a draft Habitat Management and Monitoring Plan (HMMP) for that which will need to accompany the Overall Biodiversity Gain Plan submitted in support of the deemed statutory Biodiversity Net Gain pre-commencement condition. The outline HMMP is indicative and broadly in accordance with other ecological documentation submitted with this application. It sets out management and monitoring prescriptions that are considered appropriate to the habitat types, distinctiveness and their target condition; and follows good practice methodology and is a helpful addition to the submitted suite of documentation.

Habitats and Mapping : The submitted baseline documentation identifies a broad range of habitats currently present at the development site. The development site includes an important mosaic of predominantly medium and low distinctiveness habitats. BNG Metric trading rules allow flexibility with regards to how loss or deterioration of these habitats are mitigated or compensated for. Primarily, low and medium distinctiveness habitats can be compensated for through delivery of same broad habitat group, of the same or higher distinctiveness. It is considered that many of these habitats can be created within the development site as part of post-development landscaping; or through the enhancement of existing/creation of new habitats within blue-line boundary land.

For example in this respect, the adjoining Ball Hill SINC predominantly situated within blue-lined land beyond the application red-line boundary contains very similar and contiguous habitats to the development site, but is not currently subject to a regular

maintenance regime and habitats present are therefore not in optimal condition. Therefore, the presence of the Ball Hill SINC within the ownership and control of the Applicants provides a significant opportunity for enhancement of existing SINC habitats and potential for compensation of lost or deteriorated low/medium distinctiveness habitats within the red-lined application site area arising from the proposed development. In a manner similar to the way in which the on-going management and maintenance of the Eelmoor March SSSI was secured with the DRA development in 1995, it is considered that the management and maintenance of the Ball Hill SINC should also be secured as a requirement of the s106 Agreement relating to the current development.

However, the baseline also identifies the presence of the following high and very high distinctiveness habitats within the red-line boundary that are potentially subject to loss or deterioration as a result of development having regard to a worst-case scenario development footprint.

- Lowland meadow – a very high distinctiveness habitat : The proposed development is considered likely to result in direct losses of lowland meadow situated centrally within DZ3, albeit this is existing habitat that may already be compromised due to its small parcel size and location within a built development setting. However, adjacent blue-lined land appears to host existing lowland meadow habitats and the indicative post-development proposals show enhancement of existing lowland meadow habitats there, together with the creation of new lowland meadow. Accordingly, the Ecology Officer is content that such gains are ecologically feasible.
- Lowland heathland – a high distinctiveness habitat. The proposed worst-case scenario built-form for Plot 10 within DZ1 would appear likely to result in some loss and deterioration of lowland heathland habitat that would need to be compensated for with the same habitat type. Lowland heathland needs very specific soil conditions and habitat surveys submitted with the application indicate that this habitat type is not found elsewhere within the development site. Accordingly, it is considered most unlikely that lowland heathland could be realistically and sustainably created within the red- or blue-lined boundaries of the site, indicating that expensive off-site unit/credit purchase is likely to be required.
- Lowland mixed deciduous woodland – a high distinctiveness habitat. This is located in patches along the south and west edges of the the Ball Hill SINC as a continuation of this habitat as a larger block within the southern third of the SINC - and, as such, crosses the boundary of the application site along the south-east edge of DZ3 and also parts of the northern edge of Plots 7 & 8 in DZ1. The revised Design Code document **[Doc 8]** mandates that generous ecological/landscape buffer zones are required on these margins [DC document Character Area 2, page 34] such that no significant loss of this high distinctiveness habitat is considered likely - indeed, the intention appears to be to retain this habitat. Similarly, there is a further existing area of this habitat type to be found along the south edge of Range Road along the frontage of Plot 4. Here the Strategic Landscaping Parameter Plan identifies this swathe of land to be Strategic Planting and it is considered likely that this habitat area will be retained as part of the structural landscaping of the development and, indeed, the revised Design Code document has a welcome bias towards ecological considerations and objectives by mandating native planting, species enhancement features, and retention of existing vegetation.

- Wet woodland – a high distinctiveness habitat. This is a habitat type found occupying land largely outside the application site red-line north of DZ2 and to the west of Range Road opposite Plots 1 & 2 : unsurprisingly land that contains two ponds here. Just small sections of this habitat extend into DZ2 at its northern margin, with the most significant area of wet woodland being the land added to the Ball Hill SINC last year. On the basis of the proposed development parameters and revised Design Code document it is considered likely that only a very small portion, if none, of this habitat type would be lost. Further, as already noted previously, the wet woodland situated within the application site that is now designated as SINC is mandated not to be subject to development.

The Ecology Officer has already noted the high value of these habitats for nationally important invertebrate species assemblage.

It is acknowledged that the post-development plans provided with the application are indicative due to the outline nature of the proposals. Nevertheless, the principle that habitat avoidance and mitigation as appropriate can be achieved, needs to be demonstrated. Although working to a worse-case development impact scenario is a robust approach that should ensure that BNG delivery problems do not arise later, it is clearly conceivable that the worse-case scenario of impacts will not arise, which would reduce the site's overall biodiversity unit deficit; in turn reducing the cost and complexity of BNG compensation provisions and, indeed, possibly avoiding the need for the developer to justify and obtain statutory BNG credits.

The Government's template 'Overall Biodiversity Gain Plan: Form for Phased Developments', sets out expectations for the level of detail required for discharge of the deemed BNG statutory condition with outline permissions. The Form requires that the developer set out "*...your overall strategy for meeting the target BNG percentage across the overall development*". Documentation submitted indicates that the developer is seeking to use the size of development footprint within each Reserved Matters submissions as a percentage of overall development footprint, as the means of defining a BNG delivery strategy. It is considered that this approach would have the benefit of being relatively easy to calculate and monitor over time as the development is built-out.

However, the Ecology Officer is concerned that development footprint may not be a reliable proxy for biodiversity unit loss, such that this approach may not be appropriate; or that a hybrid approach to BNG delivery may work better. Indeed, the majority of the on-site biodiversity value and therefore greatest likely biodiversity unit losses would likely arise within the early phases of development; i.e. DZs 1 & 2. DZ4 appears to host low existing biodiversity value and therefore might not have a significant unit loss, due to its existing large built form and/or sealed surface footprint, so the development of DZ4 is unlikely to offer significant opportunity for biodiversity unit delivery within itself. Furthermore, it may be difficult to justify DZ4 proposals off-setting any BNG delivery deficit from earlier phases of the development, especially in respect of the loss or deterioration of higher distinctiveness habitats across all development zones.

The Ecology Officer therefore recommends that loss of higher distinctiveness habitat ideally be avoided when detailed designs are drawn-up; however, if not, that these losses are proactively addressed within early Reserved Matters applications. This would reduce the risk that BNG delivery falls into deficit, leaving later phases of development with a higher burden of BNG unit delivery, or, in the absence of on-site options, the need to purchase expensive off-site third party units/credits - which are particularly expensive

for higher distinctiveness habitat compensation. This approach would also enable the developer to better demonstrate that the planning and BNG spatial mitigation hierarchies are met.

BNG Statutory Metric trading rules require that adverse impacts on high distinctiveness habitats have to be compensated for through provision of the same habitat type. High distinctiveness habitats are identified as such, because these habitats are rare, particularly species rich and/or require long time-frames or specific ecological conditions to develop. Acknowledging that the loss/deterioration of these habitats may be less than forecast when detailed development plans come forward at reserved matters, the Ecology Officer advises that the Applicant should ideally seek to retain these habitats as a priority; and the Applicants argue that some opportunity to compensate for high distinctiveness habitat losses appears to be feasible within adjacent blue-lined land. In this respect, the Applicants are aware of the likely significant cost, technical complication, and the potential risk of failure associated with this approach. The Applicants are also aware that high distinctiveness habitat units are not commonly available to purchase via habitat banks due to their complexity and statutory credits can be particularly expensive to acquire.

The submitted Post-Development Habitat Plan (16727/P14) **[with Doc 5]** provides an appropriate level of detail regarding the quantum and distinctiveness of habitats to be achieved within the red-line boundary. However, the blue-line boundary land is not currently included on this plan, such that, whilst a narrative assumption is put forward that residual losses of the high distinctiveness habitats could be effectively compensated for on adjacent land also within the ownership and control of the applicants, this is not currently quantified and demonstrated. This raises the question of whether the narrative proposals for dealing with any losses of high distinctiveness habitats are practically implementable. Significant swathes of the blue-lined land are already identified nature conservation sites where it is not obvious that any significant BNG enhancements could be achieved. The narrative of the submitted BNG documentation also indicates an expectation that the development will likely result in a biodiversity deficit, but that the full 10% biodiversity gain can, if necessary, be achieved through purchase of 'top-up' habitat bank units/statutory credits. However, the Ecology Officer is concerned that this approach may not accord with the BNG mitigation hierarchy.

Whilst an element of front-loading for BNG compensation delivery may raise legitimate concerns for the Applicants regarding initial cost outlay, given the possibility that later losses may not subsequently arise if, for example, reserved matters applications do not build-out to the full worst-case scenario set out at the outline stage, the Applicants have been made aware of the Council's concerns. It is considered necessary that, insofar as some areas of high distinctiveness habitats may be lost, the developer clearly demonstrates the extent to which it is feasible for this to be mitigated/compensated for within the blue-line boundary. In this respect, a suitably-worded condition can be imposed to require the submission of a revised Post-development Habitat Plan 16727/P14 to demonstrate that the planning mitigation hierarchy is applied, that where high distinctiveness habitat is subject to loss or deterioration within the red-line boundary that these losses can be clearly justified, and that it is technically feasible to compensate for these losses as far as possible within the blue-lined land. In effect these requirements will result in the submission of an **Overall Biodiversity Gain Plan** to be submitted to and approved by the Council before any development can begin as is required by the

BNG Regulations. The Applicants are aware that this is the approach that the Council is minded to take.

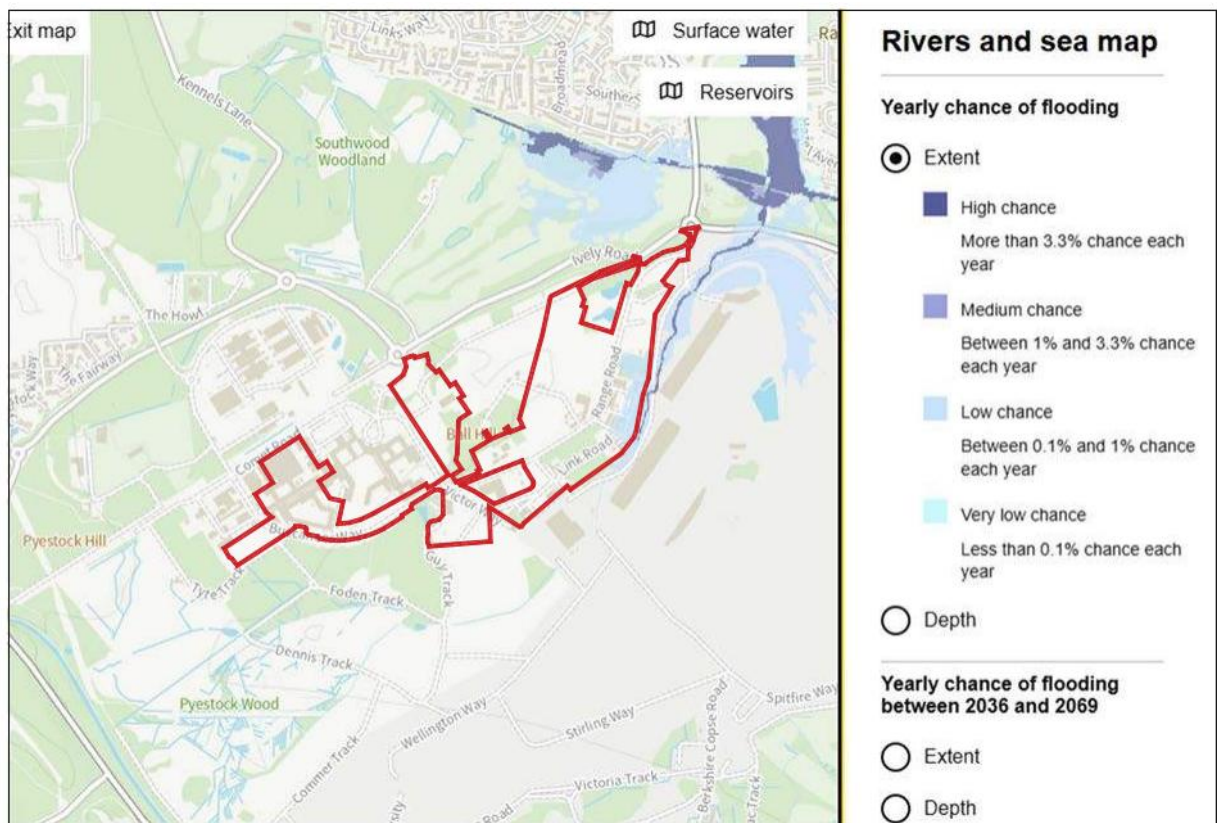
Subject to appropriately-worded conditions being imposed as set out in the preceding paragraphs it is considered that an appropriate framework would be established to ensure that the proposed development meets its BNG obligations.

12. Flood Risk & Drainage –

The application site is previously developed land, indeed the site of existing substantial development, that already possesses drainage systems and connections to off-site drainage systems and networks.

The application is supported by a Flood Risk Assessment (FRA) **[Doc 12]** which indicates that surface water drainage from CTP South currently drains into the Cove Brook. The FRA also contains a Drainage Strategy which outlines in general terms how it is envisaged that the proposed development would be drained having regard to the drainage context within which the application site sits. Proposals appear to be primarily connecting new development drainage to the Cove Brook via the existing drainage system. This Strategy also has regard to other site constraints and issues that the development also needs to address - such as the fact that there are likely pockets of chemical pollutant contamination within the development site resulting from previous and historical uses that need to be isolated at all times from the water environment; and also the need to avoid the creation of larger bodies of open water by design or otherwise that could attract flocks of large birds (i.e. waterfowl) that would present a risk to air navigation, most immediately for the adjacent Farnborough Airport.

Fluvial Flood Risk : Even taking into account climate change, the application site is almost entirely land identified by current Environment Agency (EA) Flood Risk Mapping as being at lowest risk of fluvial flooding : mainly Flood Risk Zone 1 (less than 1 in 1000 chance of fluvial flooding each year). This is with the exception of a small part of the application site within DZ1 close to Cove Brook near the boundary with Farnborough Airport, which is within Flood Risk Zone 2 (medium risk : between 1 in 1000 and 1 in 100 probability of fluvial flooding each year). In this location there are existing multiple drainage ditches that drain from the application site into Cove Brook. Adjacent land that is subject to elevated fluvial flood risk (Flood Risk Zones 2 & 3) is situated in the vicinity of Cove Brook beyond the site to the south east of DZ1 and crosses Elles Road east of the Ively Roundabout at Southwood Country Park – see blue shadings on the plan overleaf:-



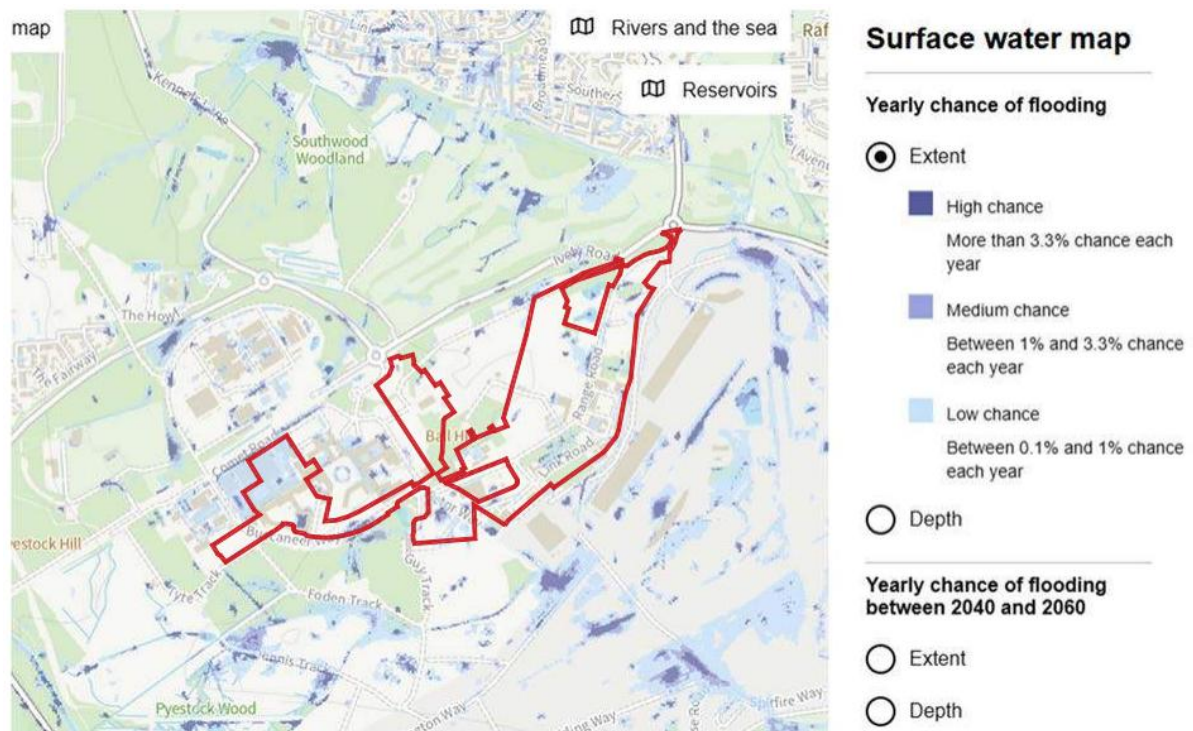
EA Flood Risk Map for Fluvial Flooding

The EA Flood Risk Map predicting flood risk for 2026-2069 taking into account climate change rise in sea level does not appreciably alter the fluvial flood risk situation in respect of the application site and its immediate surroundings in terms of the extent and depths of floodwaters.

Since the proposed development is for employment uses that are classified as “Less Vulnerable,” this means that the development is appropriate in principle in terms of flood risk considerations and does not require application of the Flood Risk Exception Test. The existence of small area of land at the application site (within DZ1) being within Flood Risk Zone 2 does not alter this conclusion.

Surface Water (Pluvial) Flood Risk : The application site is not land that is at elevated risk of surface water flooding. This is flooding that can arise when heavy rainfall overwhelms a local drainage network; and the extent and depth of surface water flooding will be dependent upon ground topography and levels, the amount of rainfall, and the effectiveness of the local drainage network. EA Surface Water Flooding mapping shows that there are numerous small areas dotted across the application site that are identified as being vulnerable to surface water flooding, which are generally localised low-points where water collects after rainfall; albeit the majority of the site area is at lowest annual risk of surface water flooding - see plan overleaf:-

Once again, the EA do not predict this extent and distribution of surface water flood risk to alter significantly when climate change is taken into account.



EA Flood Risk Map for Surface Water Flooding

Groundwater Flood Risk : Rushmoor BC's Strategic Flood Risk Assessment (SFRA : a supporting document to the current Rushmoor Local Plan) identifies the application site as land being wholly at medium risk of groundwater flooding vulnerability. Groundwater flooding arises when and where the level of the water table (i.e. the top of ground saturated with water) rises so that it is above the level of the ground, so vulnerability is a function of water table levels relative to ground levels. This form of flooding usually occurs on a seasonal basis, with the wetter autumn and winter months being the most likely times when seasonally fluctuating groundwater flooding might arise. The likelihood of more elevated groundwater levels will influence the type of surface water drainage systems that can be used : for example, infiltration drainage systems variously seeking to let drainage water soakaway into the ground are unlikely to be effective and desirable where groundwater levels are high, since there may then be little or no volume of ground available to accommodate drainage water.

Drainage Strategy : Since the planning application is expressed in outline form, the layout of the development is not yet fixed, and any proposals for the drainage of the application site can only be illustrative at this stage. Accordingly, it also follows that it is not yet possible to put forward detailed designs for the modification and upgrading of the existing drainage facilities and features that will be needed to serve the proposed development alongside the existing development at CTP to be retained. From such necessity, the Drainage Strategy within the FRA submitted with the application **[Doc 12]** is a framework to guide and inform the detailed design at Reserved Matters stage and is backed-up with specific requirements in the revised Design Code document for which permission is sought alongside the proposed Parameter Plans at the outline stage [revised DC document Pages 22 and 27 for example.

The submitted Drainage Strategy identifies some key requirements for the detailed design stage, including:-

- Surface water drainage installations must be designed to restrict discharge rates to Greenfield levels, or provide betterment where practicable, in line with Lead Local Flood Authority requirements.
- Attenuation storage will be required to accommodate up to the 1 in 100-year storm event, plus a 40% allowance for climate change.
- Sustainable Drainage Systems (SuDS) should be incorporated wherever feasible, including permeable paving, swales, tree pits, filter drains and geo-cellular storage, with allowance for exceedance routing within the site (i.e. any overflows from drainage installations shall be routed within the site).
- Finished floor levels for buildings should be set to provide resilience against surface water flood risk, including safe overland flow routes directed away from buildings and towards drainage infrastructure.
- Foul water drainage is to connect into the existing on-site foul drainage network of pumping stations and discharge to the Thames Water public sewer off-site.
- Infiltration (i.e. SUDS) drainage to ground is unlikely to be viable across much of the site due to ground conditions, such that the Drainage Strategy likely needs to rely primarily on attenuation and controlled discharge to existing watercourses.

Additionally, the Strategy identifies an appropriate theoretical hierarchy for drainage water disposal options that would seek to discharge surface water run-off as locally as possible to its source, as follows:- 1. infiltration (only where technically possible on the application site); then 2. to surface water body; and only then 3. to surface water sewers or other fixed drainage infrastructure.

Consultation responses from Drainage consultees following their careful assessment of the proposals concludes that flood risk issues can be managed appropriately and that the development will not increase flood risk on-site or elsewhere. In this respect, Reserved Matters submissions will need to provide detailed drainage designs and layouts that reflect these principles and the requirements identified in the submitted Drainage Strategy and/or enshrined within the proposed Design Code document **[Doc 8]**.

The Environment Agency (EA) has not raised any concerns about flood risk as a result of the proposed development. Indeed, as previously described in this Report, the EA focus on requesting the imposition of conditions to deal with ground contamination and the adoption of appropriate procedures to ensure that any ground contamination that may be present is not mobilised into the water environment as a result of development and thereafter. This concern is also mirrored in comments from the Council's Ecology Officer and it is noted that the revised Design Code document incorporates mandatory requirements to ensure the drainage system incorporating SuDs features is designed to maintain good water quality.

Following receipt of some additional clarifications from the Applicants **[Doc 20]** the LLFA have responded to confirm that they are content that the principles identified with the Drainage Strategy are acceptable in principle and form a sound basis on which to design a detailed drainage scheme. Accordingly, the LLFA raises no objections subject to conditions requiring submission of fully-detailed surface water drainage installation proposals at Reserved Matters stage.

The making of drainage connections to a development is subject to licencing with Thames Water that is, consequently, subject to entirely separate consideration under other legislation. As such, it is not a matter for direct and technical consideration by the Council with a planning application. Thames Water are currently working with the applicants to identify and deliver the off-site surface and foul water infrastructure needed to serve the development and have raised no objections subject to the imposition of appropriate conditions and informatives to ensure that implementation of the development does not outpace the delivery of the essential drainage infrastructure that is required.

Whilst the technical details/specification of any proposed SUDS drainage installation are the subject of separate consideration and licence approval by Thames Water and the Lead Local Flood Authority, Local Plan Policy NE8 (Sustainable Drainage Systems) requires that developments include the implementation of integrated and maintainable Sustainable Urban Drainage Systems (SUDS) in all flood zones for both brownfield and greenfield sites. In this respect it is considered that the Drainage Strategy and the requirements of the submitted Design Code document provide an appropriate and credible framework and drainage hierarchy for the detailed Reserved Matters submissions sufficient to ensure that they would be acceptable having regard to the objectives and requirements of Local Plan Policy NE8.

In the circumstances, subject to the imposition of appropriately-worded conditions as requested by the drainage authorities to apply to future Reserved Matters submissions, it is considered that the proposals would meet the requirements of adopted Local Plan Policy NE8.

13. Other Issues -

Sustainability : Criterion b. of Policy DE1 requires new developments to “promote designs and layouts which take account of the need to adapt to and mitigate against the effects of climate change, including the use of renewable energy”. Criterion n. then requires that “All development proposals will demonstrate how they will incorporate sustainable construction standards and techniques.” And: Major commercial developments over 1,000 sqm gross floorspace will be required to meet BREEAM ‘very good’ standard overall (or any future national equivalent) and BREEAM ‘excellent’ standard for water consumption (or any future national equivalent).” In this respect, the application is supported by a Sustainability & Energy Statement [**Doc 24**] that demonstrates that it would be possible for the proposed development to achieve BREEAM ‘Very Good’ rating. The revised Design Code document [**Doc 8**] mandates that the detailed designs for the development to be submitted at Reserved Matters stage are required to meet this standard [Revised DC document Page 21 refers].

Local Plan Policy DE4 also requires new non-residential development of 1000 square metres gross external area or more, which applies in respect of the proposed Aquatic Sports Centre, to provide evidence on completion of achievement of the BREEAM ‘excellent’ standard for water consumption. This can typically be achieved by undertaking measures such as the installation of water fittings with restricted flow rates.

It is indicated that the scheme would meet appropriate energy efficiency and other sustainability requirements. These are detailed matters for Reserved Matters consideration, nevertheless specific planning conditions are recommended to secure BREEAM compliance, water efficiency measures, provision of EV charging points. A final version of the Design Requirements document for the development will also require sustainability measures to be incorporated into the development.

Aviation/Flight Safety Issues for Farnborough Airport & RAF Odiham : The airspace above and around aerodromes is safeguarded to maintain an assured obstacle free environment for aircraft manoeuvre. However, Farnborough Airport has raised no objections to the proposed development from an Airport height safeguarding perspective. The Defence Infrastructure Organisation (DIO) has advised that the proposed development would sit beneath a piece of protected airspace called the Obstacle Limitation Surface (OLS) in respect of RAF Odiham that needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from, or circuiting, RAF Odiham can do so safely. The DIO advise that the OLS at this application site is set at 91.4 metres above ground level. However, since the maximum height of buildings of the proposed development is proposed with the parameter plans to be just 25 metres above ground level, they would be well below a height above ground level that would be of concern of the MOD in respect of flight operations at RAF Odiham. The DIO also advise that the proposed development is within the bird-strike safeguarding zone such that the MOD would have concerns with the creation of any habitats which have the potential to attract and support birds hazardous to air traffic such as larger SUDS and swale schemes, or the creation of a large body of water. This matter has been raised by Farnborough Airport also; and the concern has been anticipated by the applicants such that the Design Code document **[Doc 8]** incorporates requirements to ensure that larger open water features are not to be provided within the development [revised DC document Page 16].

The DIO has confirmed that there is no restriction on the building materials for the proposed development since the site is outside of the MOD technical safeguarding zone.

Farnborough Airport welcome the Applicant's acknowledgement of aviation safeguarding requirements, including compliance with CAA civil aerodrome safeguarding and MOD safeguarding zones and note that detailed safeguarding assessments will be required at Reserved Matters stage to ensure full compliance, including:

- Protection of line-of-sight and navigational infrastructure;
- Management of glint and glare from reflective surfaces; and
- Adherence to height restrictions and protected airspace contours.

It is commented that landscaping, green roofs and waste management practices must be carefully evaluated to prevent increased bird activity, which could compromise flight safety.

A Solar PV Glint & Glare Report **[Doc 22]** has been submitted with the application that concludes that, even in respect of the possibility of roof-mounted PV solar panels, no significant impacts upon aviation safety are predicted; and that no specific mitigation is required. Nevertheless, the Report notes that this is a matter that should be re-examined at Reserved Matters stage when detailed designs for the proposed development are

forthcoming. See also revised Design Code document **[Doc 8]** requirements in this respect at Page 16.

It is considered appropriate that Construction Environmental Management Plans (CEMPs) for all phases of the proposed development be required to consider height safeguarding in the context of any cranes or other tall temporary structures that may be required on site during the construction period; albeit there is a separate licencing system operated with the Airport in respect of this matter.

Provision of Utilities to Serve the Proposed Development : A Utilities Strategy Report **[Doc 33]** has been submitted with the application which confirms that the proposed development can be fully supported by existing and proposed utility infrastructure in respect of electricity, telecommunications, gas and water and drainage. The applicants will have to work with utility providers to design and provide the necessary infrastructure to serve the proposed development. Much of this work falls outside the determination of this application because the development could not proceed without the separate consent of the utility providers and the necessary infrastructure improvements taking place even if planning permission had already been granted. Where consultation responses have been received, no utility provider has indicated that it would not be possible to undertake any necessary upgrades to their networks to serve the proposed development.

Access for People with Disabilities : It is considered that there is no reason why development would be unable to provide adequate access for people with disabilities in accordance with the Building Regulations. It is appropriate that consideration of access in respect of external areas of the development be identified as a Reserved Matter for future detailed submissions and the issue is flagged with requirements to be met set out in the revised Design Code document. In the circumstances it is considered that adequate facilities would be provided for people with disabilities using the proposed development.

Development Phasing : A tentative Target Delivery Strategy is provided at Fig.5.1 of the ES and also Appendix 3 of the Planning Statement **[Doc 18]** in the form of an illustrative diagram identifying a total of 7 phases of development based on an existing OS plan base rather than the Development Zone Parameter Plan. This plan does not specifically identify Development Zones or Plots; and does not indicate a timescale, albeit the phase numbers appears to imply an order in which the proposed development may be undertaken:-

Employment & Skills : The Council holds National Skills Academy for Construction status and works in partnership with the construction industry to generate skills, training and employment opportunities on large development sites in the Borough. In addition to benefitting local employment opportunities, this initiative also benefits employers, especially where there are skill shortages that make it difficult to find appropriately skilled staff. Where it is considered appropriate to do so, early engagement with developers is fostered, often through commencing a dialogue with developers even when planning applications are still under consideration : consequently this process must operate outside of the planning system and the consideration of planning applications. In this case, the applicants are well aware of this initiative and have submitted an appropriate outline Employment & Skills Plan **[Doc 10]** on which it is considered that a long-term

working partnership with the Council can be developed as the proposed development is implemented.

Overall Conclusions –

The determination of this outline planning application for the development/re-development of CTP South and the adjoining land at Ball Hill is a key step in securing the injection of significant investment into the CTP Strategic Employment Area. It is considered that the submitted application provides the necessary framework within which the detailed proposals can come forward to make the development a reality. It is considered that the principles of the proposed development accord with planning policy at National and local level. Measures are to be put in place to ensure that the resulting development will achieve good design quality founded upon the principles of sustainable development.

The application seeks to establish development principles described by parameter plans and a Design Code document with the aim of securing significant elements of flexibility in the planning uses to be allowed, but with a detailed design that will be subject to future consideration with Reserved Matters applications that will have to conform with the Parameter Plans and the Design Code.

The development is also accompanied by an Environmental Statement. This Statement properly identifies the significant environmental impacts of the development and identifies and proposes acceptable mitigation measures.

In this context it is considered that the proposals are acceptable in principle and in highway terms; to have an acceptable impact on the visual character, appearance and heritage assets of the area; to have no material or adverse impact on neighbours; no significant impact upon the nature conservation interest and objectives of the Thames Basin Heaths Special Protection Area and upon land subject to National and Local nature conservation designations. The proposals are also considered acceptable in terms of trees, flood risk & drainage, air quality, ecology & biodiversity, sustainability and access for people with disabilities. The proposals are thereby acceptable having regard to the requirements of Policies SS1, SS2, IN1, IN2, IN3, HE4, DE1, DE4, DE10, PC1, PC2, PC5, PC8, NE1, NE2, NE3, NE4, NE5, NE6, NE7, and NE8 of the adopted New Rushmoor Local Plan (2014-2032); adopted Car and Cycle Standards SPD (2024); adopted Biodiversity Net Gain SPD (2024); and the advice contained in the National Planning Policy Framework and National Planning Practice Guidance.

Full Recommendation

It is recommended that **subject to:-**

A. confirmation from the Secretary of State for Housing, Communities and Local Government (HCLG) that the application will not be subject to call-in; and

B. the prior completion of a satisfactory legal agreement under Section 106 of the Town and Country Planning Act 1990 to secure the following:-

- (a) An appropriate Active Travel Modes financial contribution, secured by appropriate trigger points, towards the delivery of pedestrian and cycle improvements, including identified LCWIP measures, between the proposed site and Fleet and Farnborough to mitigate the transport impacts of the development and promote sustainable modes of travel; in accordance with an agreed mechanism to secure different amounts for the financial contribution depending upon whether either (i) DZ1 comes forward as a mix of uses, or: (ii) DZ1 comes forward as primarily research and development uses;
- (b) The undertaking of Off-Site Highway Improvement Works comprising pedestrian and cycle improvements to:-
 - the Range Road access (Access 3) as shown in principle on drawing 2403065-05 Rev B;
 - Ively Roundabout and Elles Road as shown in principle in drawings 2403065-07 rev B;
 - Norris Hill Roundabout pedestrian and cycle improvements as detailed in drawing 2403065-04 Rev C; and
 - Ively Road existing footway/cycleway (north of Ball Hill) – maintenance, drainage and lighting improvements.

However, should the above-mentioned highway works be deemed undeliverable, in accordance with an agreed mechanism, an equivalent Transport financial contribution amount to be secured towards alternative pedestrian and cycling infrastructure on routes connecting the proposed development to Fleet and Farnborough, such measures to be consistent with, or supportive of, the principles and priorities set out within the LCWIP or any subsequent strategy as may be in the future.

- (c) On-Site Improvement Works comprising:- the upgrading of the existing bus stop at the Concorde Way Access to include a larger shelter, covered seating, street lighting and a real time information board; and provision of a new bus stop at the Range Road access including shelter, covered seating, street lighting and a real-time information board;
- (d) Travel Plan Evaluation, Completion, Adoption and subsequent Monitoring involving:- The submitted Framework Travel Plan to be updated to reflect the preceding improvements and impose a requirement to secure individual Travel Plans for each development phase (or part thereof) of development; and secured, along with appropriate cash deposits and evaluation and monitoring fees, prior to occupation;

- (e) A Bus Shuttle Service : to be secured and implemented in accordance with the proposed public transport strategy for the lifetime of the development to include the following improvements secured by appropriate trigger points:-
- Increased shuttle bus frequency to 4 buses in the AM and PM weekday peaks;
 - Provide a lunchtime service to the town centre;
 - Additional services to be provided to deliver the bus capacity needed to support the mode share targets set out in the Framework Travel Plan and ensuring the need is reviewed regularly through the Travel Plan Monitoring Surveys to ensure patronage levels are catered for;
 - Incorporating two additional stops on the Cody Technology Park Shuttle bus service/ route at:- (i) Kingsmead in Farnborough; and (ii) On Range Road in addition to the existing stop on Concorde Way, serving the proposed expansion to Cody Technology Park;
- (f) Requirements for the management and monitoring of the biodiversity improvements to be provided with the proposed development for a minimum period of 30 years, including provision of an appropriate BNG monitoring fee;
- (g) Partial extinguishment of the obligations of the 1995 s299A Agreement and, as necessary, the retention and incorporation of existing Obligations within s299A to be continued into any new Agreement; and
- (h) the retention, management and maintenance of the Ball Hill SINC for the lifetime of the development.

the Executive Head of Economy & Growth, in consultation with the Chairman, be authorised to **GRANT** outline planning permission subject to the following **Suggested Conditions** and **Informatives**:-

1. Timescale for Submission of Reserved Matters Applications

The first application for approval of Reserved Matters shall be made to the Local Planning Authority before the expiration of three years from the date of this Outline Permission. All subsequent applications for approval of Reserved Matters shall be submitted before the expiry of 15 (fifteen) years from the date of this Outline Permission.

Reason - To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

2. Timescale for Implementation of Reserved Matters

The development hereby permitted shall be begun either before the expiration of 15 (fifteen) years from the date of this Outline Planning Permission, or before the expiration of 2 (two) years from the date of approval of the last of the reserved matters to be approved, whichever is later.

Reason - To comply with the requirements of Section 92 of the Town & Country Planning Act 1990.

3. The Approved Plans & Control Document

The development shall be implemented in accordance with the submitted Parameter Plans (Drawing Refs.PL001 (Application Area Plan, PL003 (Development Zone Parameters), PL005 (Access Plan), PL006 (Strategic Landscape Plan) & PL007 (Demolition Plan), and Design Code document (revised version dated January 2026) hereby approved.

Reason - To ensure that the development proceeds on the basis of the scheme on which the accompanying Environmental Impact Assessment has been undertaken.

4. Overall Biodiversity Net Gain Plan

Notwithstanding any information submitted with the application, an Overall Biodiversity Net Gain Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the first implementation of development subject to a Reserved Matters approval. This shall identify how a minimum of 10% Biodiversity Net Gain is to be delivered with the development overall in accordance with best practice (including BS 8683:2021 or as may be revised), including details of any off-site Biodiversity Net Gain provision to be made. The Overall Biodiversity Net Gain Plan shall subsequently be updated as necessary in order to reflect any changes and/or opportunities with BNG provision that may arise during the course of the implementation of the development hereby approved.

Reason - To accord with the requirements of the BNG Regulations and to ensure that the required minimum provision of 10% Biodiversity Net Gain is achieved with the development. *

5. Reserved Matters Details

No development (excluding demolition) shall commence on any Phase of development or part thereof until details of the following Reserved Matters have been submitted to and approved in writing by the Local Planning Authority in respect of that Phase or part thereof:-

- a) The layout and siting of all buildings, structures and associated areas on site;
- b) The appearance and architectural design of all buildings and structures on site specifying and/or providing samples of the type, quality, colour and/or surface finish of external materials to be used including details of fenestration, rainwater goods, and external plant and tanks;
- c) The scale of the buildings indicating massing and building bulk;
- d) The landscaping of the site specifying both the hard, soft treatments and means of enclosure including a detailed landscaping design and specification showing the planting proposed to be undertaken, the materials to be used for paved and hard surfaces, details of ecological enhancement features (including locations, specifications and management measures) and the proposed finished levels in relation to existing levels;

- e) The remaining means of access to all buildings from an existing or proposed highway, specifying vehicular, cycle and pedestrian routes and including the layout, construction and sight-lines;
- f) An accurate plan showing the position, type and spread of all existing trees to be retained on and adjacent to the specific development phase; a schedule detailing the size and physical condition of each tree and, where appropriate, the steps to be taken to bring the tree(s) to be retained to a satisfactory condition, and, also details of any proposals for the felling, lopping, topping or up-rooting of any tree;
- g) A Phase (or part thereof) Biodiversity Gain Plan;
- h) The strategy for Foundation Design & Construction;
- j) Details of the provision of utility and telecommunications connections (including high speed broadband) including sub-stations, street boxes and other installations;
- k) The provision to be made for the parking of vehicles;
- l) The provision to be made for the turning, loading and unloading of vehicles;
- m) The provision to be made for Electric Vehicle Charging Point installations;
- n) The provision to be made for the storage and removal/collection of refuse and recyclable materials from the development and use(s) to be located within that development phase;
- o) Details of cycle parking/storage provision to be located within that development phase;
- p) Details and appropriate specifications of all external plant, equipment and other installations (including, if required, external satellite/aerial systems) to be provided;
- q) Means and measures to be taken to manage air pollution to reduce N₂O critical loads within Eelmoor Marsh as a result of any generator and/or other plant installations emitting fumes to the atmosphere that are required. This information to be presented graphically with the 1% significant effect line shown.
- r) Detailed safeguarding assessments in respect of air navigation and safety in respect of, in particular, Farnborough Airport, to include:-
 - Protection of line-of-sight and navigational infrastructure;
 - Management of glint and glare from reflective surfaces; and
 - Adherence to height restrictions and protected airspace contours.

Note: landscaping, any green roofs, provision of larger water features and waste management practices must be carefully evaluated to prevent increased bird activity, which could compromise flight safety; and

- s) Details of the provision to be made for external access facilities for people with disabilities;

each of the Reserved Matters as may be approved shall be implemented in accordance with the approved details before the development featured in the relevant Reserved Matters application is occupied, unless otherwise first agreed in writing by the Local Planning Authority.

In respect of the approval of any external and/or surfacing materials the materials used in the development shall be either those specified and approved; or materials of similar type, quality, colour and surface finish to those specified and approved.

Reason - As required by Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004. *

6. Conformity with the Outline Application Control Plans and Document

All development detailed within Reserved Matters applications submitted pursuant to Condition No.5 shall be in general accordance with the Parameter Plans and Design Code approved as part of this outline planning permission. Each Reserved Matters submission shall be accompanied by a statement explaining how and why this would be the case.

Reason - To ensure that the detailed proposals submitted as Reserved Matters conform sufficiently to the indicative details submitted with this outline application that have formed the basis of the Environmental Impact Assessment (EIA) supporting the proposals.

7. Data Centre Development at Development Zones 2 and 4

Notwithstanding the reference to provision of general B8 use on the approved Parameter Plans for Development Zones 2 & 4, all of the development to be implemented within Development Zones 2 and 4 shall comprise data centres and associated infrastructure only.

Reason – For the avoidance of any doubt and to ensure that there are no significant additional impacts arising from the detailed proposals for Development Zones 2 and 4 beyond those identified with the outline application and EIA.

8. Construction Traffic Management Plan

No phase or part thereof of development shall commence until a Construction Traffic Management Plan (CTMP) for the relevant phase or part thereof has been submitted to and approved in writing by the Local Planning Authority (in consultation with National Highways and the Highway Authority). The approved CTMP shall be implemented for the duration of the construction of that phase or part thereof of the development. Each CTMP shall set out measures to manage the movement of construction traffic and shall include:-

- a. a programme and phasing for demolition (if any) and construction work;

- b. the arrangements and routing of construction vehicles to and from the site associated with all demolition and construction works including appropriate junction tracking diagrams (if required);
- c. details of site access arrangements and any proposed temporary traffic management measures, particularly including road closures and diversion routes;
- d. arrangements for the parking of contractors' vehicles and site operatives;
- e. loading and unloading arrangements, including the timing of deliveries;
- f. means and measures to prevent mud, debris and dust from being deposited on the public highway; and any onward migration of such material should the approved means and measures fail, such as deployment of mechanical road sweepers and any subsequent remedial works required to repair damage to the public highway, including to signage and road lining/markings;
- g. measures to safeguard pedestrians and cyclists; and
- h. the hours during which construction traffic may operate including measures to minimise construction traffic during peak periods.

The development of each phase or part thereof shall thereafter be carried out in accordance with the approved CTMP for the relevant phase or part thereof unless otherwise agreed in writing by the Local Planning Authority.

Reason – At the request of National Highways and the Highway Authority in the interests of the safety and convenience of highway users on the surrounding highway network during the construction period. *

9. Operational Management Plan

Prior to first occupation (or first use) of each phase or part thereof of the development, an Operational Management Plan (OMP) for the relevant phase or part thereof shall be submitted to and approved in writing by the Local Planning Authority (in consultation with National Highways and the Highway Authority). The approved Plan shall thereafter be implemented in full for the lifetime of each phase or part thereof of the development unless otherwise agreed in writing by the Local Planning Authority. Each OMP shall include (but not be limited to) details of:-

- a. the day-to-day operation of the site, including hours of operation;
- b. arrangements for servicing, deliveries and refuse collection (including the identification of opportunities to minimise HGV movements during peak periods);
- c. on-site parking and servicing management;
- d. measures to manage noise, disturbance and amenity impacts on neighbouring occupiers;
- e. the safeguarding and management of pedestrian and cycle movements within and adjacent to the site; and
- f. a named site or premises manager responsible for implementation of the Plan.

The development of each phase or part thereof shall be operated in accordance with the approved Operational Management Plan for the relevant phase or part thereof.

Reason – At the request of National Highways and the Highway Authority to mitigate any adverse impact from the development on the M3 Motorway, to ensure that the M3 Motorway continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety. *

10. Demolition/Construction Hours

Construction or demolition work of any sort within the area covered by the application site shall only take place between the hours of 0800-1800 Hours on Monday to Fridays and 0800-1300 Hours on Saturdays. No work at all shall take place on Sundays and Bank or Statutory Holidays.

Reason - To protect the amenities of neighbouring properties in the vicinity.

11. Site-Specific Construction Environmental Management Plan (CEMP)

No phase or part thereof of development shall commence until a site-specific Construction & Environmental Management Plan (CEMP) to be implemented to avoid or mitigate impacts of emissions to air, water and ground; and impacts on species and habitats arising from the demolition and/or construction works for the relevant phase or part thereof has been submitted to and approved in writing by the Local Planning Authority.

The CEMP to be submitted must include, but not be limited to, addressing and/or provide details in respect of the following, including as appropriate any necessary risk assessment(s) undertaken by suitably qualified and experienced persons according to current best practice:-

- the location of any temporary site buildings, compounds, construction material and plant storage areas;
- Dust Control Measures, including provisions for monitoring and actions in the event that controls are not maintained;
- Noise Management Measures (particularly in proximity to the Eelmoor Marsh SSSI);
- Vibration Control Measures (also particularly in proximity to the Eelmoor Marsh SSSI) including in respect of the construction of any piled foundations with an assessment of the impact of piling on sensitive receptors including residential premises as well as potentially sensitive users on site. The method shall include details of requirements for surveys of premises before and after piling as may be required;
- Mitigation of Visual impacts;
- Ground contamination, including in respect of any radiological hazards and unexploded ordnance;
- Biodiversity Protection Zones and Ecological Watching Brief requirements;
- Ecological mitigation and protection measures as recommended in the species ecological surveys hereby approved and/or to be undertaken;
- Risks to ground water;
- Tree Protection Measures;
- Site hoarding arrangements;
- Height Safeguarding in the context of any cranes or other tall temporary structures;
- Site compound arrangements – with welfare facilities and storage of materials, chemicals, vehicles and equipment to be located away from ecological designations;
- Control measures to reduce and mitigate the risk of spillages/run-off of chemicals and fuel from construction areas into adjoining/nearby watercourse(s) and to respond to any unexpected contamination encountered;
- Waste Management : the means and methods of waste storage and disposal;
- Any requirement for temporary lighting, including measures to ensure boundary habitats are not illuminated;

- Hours of work on site and the timing of works to avoid ecological impacts, for example, the bird-nesting season;
- A Community Liaison and Complaints procedure;
- Means and measures for the management of emergency or unforeseen works; and
- Monitoring and review of compliance with CEMP measures.

The development of each phase or part thereof shall thereafter be carried out in accordance with the approved CEMP for the relevant phase or part thereof unless otherwise agreed in writing by the Local Planning Authority.

Reason - To ensure a satisfactory implementation of the approved development in the interests of amenity and convenience and to ensure the protection of wildlife in the interests of nature conservation in accordance with the National Planning Policy Framework. *

12. Surface Water Drainage Scheme

No phase or part thereof of development shall commence until a detailed Surface Water Drainage Scheme for the relevant phase or part thereof has been submitted to and approved in writing by the Local Planning Authority. The detailed Surface Water Drainage Scheme to be submitted shall as a minimum include:-

- a. The location, layout and means of construction of foul sewers and surface water drains (including any off-site disposal requirements);
- b. Suitably detailed measures to avoid deterioration of drained surface water entering Cove Brook, together with monitoring and mitigation measures to ensure that quality of water is maintained during the operational use of the proposed development;
- c. A technical summary detailing the key parameters used in design, linked to the principles within the submitted Flood Risk Assessment;
- d. Infiltration test results undertaken in accordance with BRE365, providing a representative assessment of those locations where infiltration features are proposed demonstrating the 1m unsaturated zone;
- e. Detailed drainage plans to include type, layout and dimensions of all drainage features including references to link to the drainage calculations;
- f. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change;
- g. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753;
- h. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria; and
- i. Details of long-term ownership and maintenance of all drainage features.

The development of each phase or part thereof shall thereafter be carried out in accordance with the approved Drainage Scheme for the relevant phase or part thereof unless otherwise agreed in writing by the Local Planning Authority.

Reason – At the request of the Drainage Authorities and to reflect the objectives of Policy NE8 of the Rushmoor Local Plan (2014-2032). *

13. Tree Protection

With the exception of any emergency works that may be required subject to the prior written agreement of the Local Planning Authority, no existing trees within the application site shall be lopped, topped, felled, destroyed or damaged until Reserved Matters approval has been obtained for the area of land where they are located. With the exception of any trees specifically approved at Reserved Matters stage to be removed, or as may be otherwise agreed in writing by the Local Planning Authority, no existing tree, or hedge within the application site shall subsequently be felled, destroyed or damaged unless otherwise agreed in writing by the Local Planning Authority.

Reason - To preserve the amenity value of existing trees.

14. Ecology : SPA Visitor Disturbance Management Measures

An appropriate visitor access management and monitoring plan shall be submitted to and approved by the Local Planning Authority prior to the first occupation of any development approved by this outline planning permission in order to ensure, beyond reasonable scientific doubt, that the proposed development will not have an adverse effect on the designated bird features of the Thames Basin Heaths Special Protection Area (TBHSPA) as a result of recreational visitor disturbance. Measures to be considered could include closure of certain gates, closure of certain paths, stay on the path / sensitive ecology signage, promotion of recreational greenspace within the Cody campus and away from Eelmoor Marsh, monitoring of visitor access to ensure that predicted numbers are correct, a suite of mitigation measures should visitor numbers exceed those predicted.

Reason – To protect the integrity and nature conservation interest of the TBHSPA. *

15. Ecology : Bat Surveys

Except where up-to-date (in accordance with industry best practice guidance) bat survey information submitted with the outline application confirms the presence or absence of bats for a specific phase, or part thereof, each Reserved Matters submission shall be supported by:

- (a) full bat roost assessment and emergence/roost characterisation surveys completed as necessary in accordance with best practice survey guidelines, including access to all relevant roof voids where safety allows; and
- (b) full bat survey results, commentary and detailed mitigation & compensation Any necessary mitigation and compensation measures shall be incorporated into the Reserved Matters submissions as appropriate and thereafter implemented in full.

Reason: To ensure the protection of wildlife in the interests of nature conservation in accordance with the National Planning Policy Framework. *

16. Ecological Walk-Over Survey Prior to Commencement of Development on any Phase (or part thereof)

No development or site clearance shall commence on any phase of development or part thereof until, and in accordance with industry best practice guidance, an ecological walk-over survey has been undertaken by a suitably qualified ecologist to identify the presence of any protected species and any changes in the presence and distribution of protected wildlife species within the relevant phase or part thereof. In respect of badgers, this would identify any new active setts that have been excavated within the area of the

works to be undertaken within the relevant phase or part thereof since any original surveys are completed and appropriate proposals and details for the provision of any replacement setts required where closure of a main sett is necessary.

In the event that protected species are identified within the area of the development involved, no works shall start and a survey report incorporating a scheme of mitigation measures to protect any such protected species as are found shall be submitted to the Local Planning Authority for consideration and approval as appropriate. The scheme of mitigation as may subsequently be approved shall thereafter be implemented in full in accordance with the approved mitigation details prior to and/or during the commencement of works within the relevant phase or part thereof as specified in all respects.

Reason: To ensure the protection of wildlife in the interests of nature conservation in accordance with the National Planning Policy Framework. *

17. External Lighting Details

No phase or part thereof of development shall commence above slab level until details of external lighting to be implemented for the relevant phase or part thereof has been submitted to and approved in writing by the Local Planning Authority.

The submissions pursuant to this condition shall incorporate a Sensitive Light Management Plan (SLMP) detailing the provision to be made for street and other external lighting including measures to prevent spillage and light pollution; and, where appropriate, creation of dark vegetated corridors for commuting and foraging habitat for bats to be informed and designed by best practice ecological input and accompanied by appropriately detailed isolux models that demonstrate that dark corridors can be maintained both at ground level and at vertical heights relevant to bat foraging and commuting.

The development of each phase or part thereof shall thereafter be carried out in accordance with the approved External Lighting Details and SLMP for the relevant phase or part thereof unless otherwise agreed in writing by the Local Planning Authority.

Reason - To ensure no unnecessary illumination is used; and to ensure the protection of wildlife in the interests of nature conservation in accordance with the National Planning Policy Framework. *

18. Reptile Translocation

No development or site clearance shall commence on any phase of development or part thereof until, and in accordance with industry best practice guidance, an appropriately detailed Reptile Translocation Plan in respect of the reptile species found to be present at the application site has been submitted to and approved in writing by the Local Planning Authority. The Reptile Translocation Plan as may be approved shall subsequently be implemented in full.

Any proposed translocation site shall have regards to the existing reptile population present at that site and demonstrate that the site can accommodate the influx of new individuals translocated in.

The development of each phase or part thereof shall thereafter be carried out in accordance with the approved Reptile Translocation Plan for the relevant phase or part thereof unless otherwise agreed in writing by the Local Planning Authority.

Reason – To ensure the protection of wildlife in the interests of nature conservation in accordance with the National Planning Policy Framework. *

19. Noise Emission Controls

No phase or part thereof of development shall commence until details of the means and measures to be taken to manage noise emissions and protect adjacent areas from excessive noise as a result of the proposed development, including the measures to be taken to bring noise levels at the boundary with Eelmoor Marsh to at, or below, 70dB(A)_{Leq,T} as a result of the operation of the proposed development, have been submitted to and approved in writing by the Local Planning Authority.

The efficacy of the means and measures are to be quantified and demonstrated to the Local Planning Authority through predictive modelling prior to commencement of development and operation, together with details of management measures and procedures for ongoing monitoring and contingency to ensure levels do not exceed 70dB(A)_{Leq,T} at the boundary with Eelmoor Marsh.

In this respect, in the event that the details submitted pursuant to this condition relate to the proposed installation and operation of back-up power supply generators the details to be submitted shall include the maintenance and testing regime to be operated; management measures to be established to have due regard for the bird-nesting season; and co-ordinate the maintenance/testing regime to ensure that this is undertaken on a rotating basis across the development in order that there are no times when significant generator testing/maintenance activity is unduly concentrated within the development as a whole.

The development of each phase or part thereof shall thereafter be carried out in accordance with the approved Noise Emission Control means and measures for the relevant phase or part thereof unless otherwise agreed in writing by the Local Planning Authority.

Reason - To protect the integrity and nature conservation interest of the Thames Basin Heaths Special Protection Area; and to ensure the protection of wildlife generally in accordance with the National Planning Policy Framework. *

20. Retention of Parking

The use of any new premises within the development shall not commence until car parking facilities have been provided and made available to support the operation of those premises. The parking areas shall thereafter be retained solely for parking purposes, and made available to the occupiers and visitors to the premises unless otherwise first agreed in writing by the Local Planning Authority. *

Reason - To ensure that provision for adequate vehicle parking is available for users of and visitors to the development in the interests of highway safety.

21. Plant & Machinery

Any building servicing plant and machinery (including mechanical ventilation) to be installed associated with any of the new premises within the development hereby approved shall, as appropriate and reasonably feasible, be enclosed with soundproofing materials and mounted in a way which will minimise transmission of structure-borne sound and any external visual impact.

Reason – In the interests of visual amenity and to protect adjoining land and property from undue noise disturbance and/or nuisance.

22. Retention of Refuse/Recycling Facilities

No new premises hereby permitted shall be occupied and brought into use until the refuse/recyclable bin storage and collection measures approved as a Reserved Matter have been implemented and these facilities shall be maintained and retained thereafter in accordance with the approved details, unless otherwise first agreed in writing by the Local Planning Authority.

Reason - To safeguard the amenities of the area.

23. Site Investigation & Remediation Measures

Prior to each Phase or part thereof of development approved pursuant to Condition No.5 of this planning permission, no development (excluding demolition) pursuant to that phase or part thereof shall commence until there has been submitted to and approved in writing by the Local Planning Authority a scheme to deal with contamination of land and the hazards it poses to the workers, future occupiers, the water environment and ecosystems within the relevant phase. The scheme shall be designed and undertaken in accordance with BS 10175: 2011+ +A2:2017 Investigation of Potentially Contaminated Sites – Code of Practice and the Environment Agency Risk Management model (LCRM).

The scheme shall include all of the following sequence of measures, unless the Local Planning Authority specifically agrees to dispense with any such requirement(s) in writing:-

- a. A Phase I site investigation report carried out by a competent person to include a desk study, site walkover, the production of a site conceptual model and a human health and environmental risk assessment;
- b. A Phase II intrusive investigation report detailing all investigative works and sampling on site, together with the results of the analysis. The report shall include a detailed quantitative human health and environmental risk assessment;
- c. A remediation scheme detailing how the remediation will be undertaken, what methods will be used and what is to be achieved. A clear end point of the remediation shall be stated, and how this will be validated/verified. The need for any ongoing monitoring shall also be determined;
- d. If during the works contamination is encountered which has not previously been identified, then works in that area shall be stopped until such time as an appropriate assessment has been made in accordance with a. to d. inclusive has been undertaken.

e. A validation report detailing the proposed remediation works and quality assurance certificates to show that the works have been carried out in full accordance with the approved methodology shall be submitted prior to the development within the Reserved Matters phase being brought into use. Details of any validation post-remedial sampling and analysis to demonstrate that the site has complied with the remediation objectives and targets shall be included, together with the necessary documentation detailing what waste materials have been removed from the site.

Reason - (1) To ensure that the site is safe for the development permitted and in the interests of amenity and pollution prevention; and to ensure that the development does not contribute to, and is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution; and (2) to ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete; in line with Paragraph 170 of the National Planning Policy Framework. *

24. Unforeseen Ground Contamination

If unforeseen ground conditions or materials which suggest potential or actual contamination are revealed at any time during implementation of the approved development it must be reported, in writing, to the Local Planning Authority. A competent person must undertake a risk assessment and assess the level and extent of the problem and, where necessary, prepare a report identifying remedial action which shall be submitted to and approved in writing by the Local Planning Authority before the measures are implemented.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared and is also subject to approval in writing by the Local Planning Authority.

Reason - To ensure that the site is safe for the development permitted and in the interests of amenity and pollution prevention.

25. No Sound Reproduction Equipment

No sound reproduction equipment, conveying messages, music, or other sound which is audible outside the development hereby permitted shall be installed without the prior written consent of the Local Planning Authority.

Reason – To protect the integrity and nature conservation interest of the Thames Basin Heaths Special Protection Area and other adjoining and nearby nature conservation sites.

26. Sustainability : Electric Vehicle Charging Point Provision & Details

Any Electric Vehicle Charging Point installations approved at the Reserved Matters Stage shall subsequently be installed and made operational and available to occupiers of the development prior to the car parking area(s) in which they would be located being first brought into use and shall be retained thereafter.

Reason - To reflect the objective of enabling a sustainable development.

27. Sustainability : Water Efficiency

In respect of all new buildings to be provided exceeding 1000 sqm of floorspace (excluding data centres), the development shall be designed to achieve the BREEAM 'excellent' standard for water consumption (or any national equivalent) to be confirmed by the submission to the Local Planning Authority of a post-construction BREEAM certificate.

Reason - To manage water consumption efficiently consistent with the requirements of Policy DE4 of the adopted Rushmoor Local Plan (2014-2032) and the advice in NPPF Paragraph 154.

28. Archaeology : Written Scheme of Investigation of Buildings to be Demolished

The development shall be carried out in full accordance with the Written Scheme of Investigation (WSI) for Historic Building Recording Report (February 2026) hereby approved. No part of the development hereby permitted shall be occupied until the site investigation and post-investigation assessment of the relevant demolished buildings on site has been completed in accordance with the approved WSI and the provision for analysis, publication, and dissemination of results has been secured.

Reason - To ensure that any remains relating to the aviation history of the site are properly identified and appropriately recorded for posterity and potential future study in accordance with the requirements of the National Planning Policy Framework (NPPF).*

29. Skills & Employment Plan Implementation

The submitted Skills & Employment Plan hereby approved shall be implemented in full and the measures introduced retained thereafter.

Reason - To maximise opportunities for associated skills and employment in the local area. *

Informatives:

1. **INFORMATIVE - REASONS FOR APPROVAL** - The Council has granted permission because the proposal would be in general conformity with the Development Plan and the merits of the proposal have been considered in the planning balance.

The determination of this outline planning application for the development/re-development of CTP South and Ball Hill is a key step in securing the injection of significant investment into the CTP Strategic Employment Area. It is considered that the submitted application provides the necessary framework within which the detailed proposals can come forward to make the development a reality. It is considered that the principles of the proposed development accord with planning policy at National and local level. Measures are to be put in place to ensure that the resulting development will achieve good design quality founded upon the principles of sustainable development.

The application seeks to establish development principles described by parameter plans and a Design Code document with the aim of securing significant elements of flexibility in the planning uses to be allowed, but with a detailed design that will be

subject to future consideration with Reserved Matters applications that will have to conform with the Parameter Plans and the Design Code. The development is also accompanied by an Environmental Statement. This Statement properly identifies the significant environmental impacts of the development and identifies and proposes acceptable mitigation measures.

In this context it is considered that the proposals are acceptable in principle and in highway terms; to have an acceptable impact on the visual character, appearance and heritage assets of the area; to have no material or adverse impact on neighbours; no significant harmful impact upon the nature conservation interest and objectives of the Thames Basin Heaths Special Protection Area and upon land subject to National and Local nature conservation designations. The proposals are also considered acceptable in terms of trees, flood risk & drainage, air quality, ecology & biodiversity, sustainability and access for people with disabilities. The proposals are thereby acceptable having regard to the requirements of Policies SS1, SS2, IN1, IN2, IN3, HE4, DE1, DE4, DE10, PC1, PC2, PC5, PC8, NE1, NE2, NE3, NE4, NE5, NE6, NE7, and NE8 of the adopted New Rushmoor Local Plan (2014-2032); adopted Car and Cycle Standards SPD (2024); adopted Biodiversity Net Gain SPD (2024); and the advice contained in the National Planning Policy Framework and National Planning Practice Guidance.

It is therefore considered that subject to compliance with the attached conditions, and legal agreements, and taking into account all other material planning considerations, including the provisions of the development plan, the proposal would be acceptable. This also includes a consideration of whether the decision to grant permission is compatible with the Human Rights Act 1998.

2. **INFORMATIVE** - This permission is subject to a Legal Agreement under Section 106 of the Town and Country Planning Act 1990 (as amended). If your legal obligations includes payment of sums, then you must contact the Council (at plan@rushmoor.gov.uk) at least 20 days prior to the commencement of the development or other trigger for the payment both stating your intended date of commencement or the reaching of the trigger and requesting an invoice to pay such funds. The payment of all contributions as required by such s106 must be received prior to the point at which the commencement of development or development trigger point is reached.
3. **INFORMATIVE** - Your attention is specifically drawn to the conditions marked *. These condition(s) require the submission of details, information, drawings etc. to the Local Planning Authority **BEFORE WORKS START ON SITE** or, require works to be carried out **BEFORE COMMENCEMENT OF USE OR FIRST OCCUPATION OF ANY BUILDING**. Failure to meet these requirements is in contravention of the terms of the permission and the Council may take enforcement action to secure compliance.
4. **INFORMATIVE** - The applicant is recommended to achieve maximum energy efficiency and reduction of Carbon Dioxide emissions by:
 - a) ensuring the design and materials to be used in the construction of the buildings are consistent with these aims; and
 - b) using renewable energy sources for the production of electricity and heat using efficient and technologically advanced equipment.

5. INFORMATIVE - The planning permission hereby granted does not authorise the applicant, or his agents, to construct a new/alterd access to, or other work within, the public highway. A separate consent for works within the highway must first be obtained from the highway authority who may be contacted at the following address:- Hampshire County Council Highways Sub Unit, M3 Motorway Compound, Hook, Hampshire, RG27 9AA.
6. INFORMATIVE - No materials produced as a result of site preparation, clearance, or development should be burnt on site. Please contact the Council's Environmental Health Team for advice.
7. INFORMATIVE - Measures should be taken to prevent mud from vehicles leaving the site during construction works being deposited on the public highway throughout the construction period.
8. INFORMATIVE - The applicant is advised that during the demolition and/or construction phase(s) of the development measures should be employed to contain and minimise dust emissions, to prevent their escape from the development site onto adjoining properties. For further information, please contact the Council's Environmental Health Team.
9. INFORMATIVE - It is a legal requirement to notify Thames Water of any proposed connection to a public sewer. In many parts of its sewerage area, Thames Water provides separate public sewers for foul water and surface water. Within these areas a dwelling should have separate connections: a) to the public foul sewer to carry waste from toilets, sinks and washing machines, etc, and b) to public surface water sewer for rainwater from roofs and surface drains. Mis-connections can have serious effects: i) If a foul sewage outlet is connected to a public surface water sewer this may result in pollution of a watercourse. ii) If a surface water outlet is connected to a public foul sewer, when a separate surface water system or soakaway exists, this may cause overloading of the public foul sewer at times of heavy rain. This can lead to sewer flooding of properties within the locality. In both instances it is an offence to make the wrong connection. Thames Water can help identify the location of the nearest appropriate public sewer and can be contacted on 0845 850 2777.
10. INFORMATIVE - The applicant is advised to follow good practice in the demolition of the existing buildings on site including the re-use of all material arising from demolition as part of the redevelopment wherever practicable.
11. INFORMATIVE - In the UK all species of bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and under Schedule 2 of the conservation (Natural Habitats & c) Regulations 2004. The grant of planning permission does not supersede the requirements of this legislation and any unauthorised works would constitute an offence. If bats or signs of bats are encountered at any point during development then all works must stop immediately and local Natural England office and Rushmoor Borough Council must be informed.
12. INFORMATIVE - It is an offence to intentionally kill, injure or take any wild bird, or intentionally to damage, take or destroy its nest whilst it is being built or in use.

Development activities such as tree felling, vegetation removal or site clearance should be timed to avoid the bird breeding season of 1st March to 31st August inclusive. If this is not possible and only small areas of dense vegetation are affected, the site should be inspected for active nests by a competent ecologist within 24 hours of any clearance works. If any active nests are found they should be left undisturbed with a buffer zone around them, until it can be confirmed by an ecologist that the nest is no longer in use.

13. INFORMATIVE - Industry best practice guidance for avoidance of adverse impacts on nocturnal species as a result of artificial lighting is set out in BCT & ILP (2018) Guidance Note 08/18 Bats and Artificial Lighting in the UK. Bats and the Built Environment. Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby.
14. INFORMATIVE - The Applicants are reminded that the proposed commercial premises should be made accessible to all disabled people, not just wheelchair users, in accordance with the duties imposed by the Equality Act 2010. This may be achieved by following recommendations set out in British Standard BS 8300: 2009 "Design of buildings and their approaches to meet the needs of disabled people - Code of Practice". Where Building Regulations apply, provision of access for disabled people to the premises will be required in accordance with Approved Document M to the Building Regulations 2000 "Access to and use of buildings".
15. INFORMATIVE - Water Efficiency : the applicants can find out how to achieve BREEAM 'excellent' standard for water efficiency by going to the Building Research Establishment Ltd website BREEAM - BRE Group.
16. INFORMATIVE - The applicants are reminded that an underground ESSO Pipeline and associated apparatus is routed close to the application site. In this respect, the Applicants' attention is drawn to the information and advice provided by Fisher German LLP representing ESSO that has already been provided.
17. INFORMATIVE – The Applicants are reminded of the consultation comments from Farnborough Airport and the Defence Infrastructure Organisation (on behalf of the MoD) concerning height safeguarding etc in proximity to Farnborough Airport and other nearby aerodromes.
18. INFORMATIVE – The Environment Agency advises the Applicants that, in the event that the proposed development is to include Battery Energy Storage Systems (BESS), the Applicants are advised as follows:- Should battery containers become exposed in the event of a fire, highly polluting chemicals in batteries could enter groundwater through firewater or rainfall runoff potentially affecting groundwater quality. Accordingly, appropriate mitigation must be put in place with BESS for the containment of surface water and rainfall runoff in the event of a fire and subsequent disposal of this contained water off-site.

Whilst in the event of a fire involving a BESS, it is accepted best practice to let the containers on fire burn out, it is likely water will be used to cool neighbouring containers. This water could enter burning containers through surface water run off or directly from spray cooling neighbouring containers. Furthermore, during or

following a fire at a BESS development, water could enter exposed containers through rainfall during the period it takes to remove or cover burnt out containers. Any development proposal utilising BESS should have emergency response/contingency plans which detail how those risks as detailed above will be managed and environmental impacts prevented, reduced, removed or contained. These plans should ensure that no polluted runoff enters groundwater under the site. The Department for Energy publication “Security and Net Zero: Health and Safety in Grid Scale Electrical Energy Storage Systems”, provides guidance on emergency planning. Any plan for each site must include the EA Incident Number 0800 80 70 60 for prompt operator reporting so that the EA can risk assess the incident and risk to the environment.

19. INFORMATIVE – The Environment Agency advises the Applicants as follows in respect of boreholes to abstract water in the event of a fire – Groundwater Investigation Consents : The Environment Agency regulates the abstraction of water from surface water and groundwater. An abstraction licence is not needed to install and test a borehole solely for the purpose of firefighting (including training and testing). It is recommended the operator of the site obtains a groundwater investigation consent (under section 32/3 of the Water Resources Act 1991) so they can find out whether there is adequate water available. See Apply for consent to investigate a groundwater source - GOV.UK (www.gov.uk) for further information.
20. INFORMATIVE – The Lead Local Flood Authority (Hampshire County Council) advises the Applicants as follows:- It is important to ensure that the long-term maintenance and responsibility for Sustainable Drainage Systems is agreed between the Local Planning Authority and the Applicant. This should involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies. For SuDS systems to be adopted by Hampshire Highways it is recommended that you visit the website at: <https://www.hants.gov.uk/transport/developers/constructionstandards> for guidance on which drainage features would be suitable for adoption. Where the proposals are connecting to an existing drainage system it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.
21. INFORMATIVE - The Lead Local Flood Authority (Hampshire County Council) advises the Applicants as follows:- Works in relation to ordinary watercourses : PLEASE NOTE: If the proposals include works to an ordinary watercourse, under the Land Drainage Act 1991, as amended by the Flood and Water Management Act 2010, prior consent from the Lead Local Flood Authority is required. This consent is required as a separate permission to planning. Information on ordinary watercourse consenting can be found at the following link: <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/change-watercourse> It is strongly recommended that this information is reviewed before Land Drainage consent application is made. For guidance on providing the correct information, we recommend you use our Ordinary Watercourse Consents Pre-application service and help avoid delays occurring at the formal application stage. A Pre-application service for Ordinary

Watercourse Consents is available, allowing consents to go through in a smoother, often more timely manner. For full information please visit: <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/changetwatercourse>

- 22.INFORMATIVE - In respect of condition No.15 best-practice guidance in respect of whether existing ecology survey data remains up-to-date is provided by the Chartered Institute of Ecology and Environmental Management (CIEEM) : Advice Note “On the lifespan of Ecological Reports & Surveys (April 2019).
- 23.INFORMATIVE – The Applicants are reminded that the control of display of advertisements is subject to separate controls within the Planning system. Please contact the Council’s Development Management Team if any advice is required concerning this matter at: plan@rushmoor.gov.uk
- 24.INFORMATIVE - The Applicant is requested to bring the conditions attached to this permission to the attention of all contractors working or delivering to the site, in particular any relating to the permitted hours of construction and demolition; and where practicable to have these conditions on display at the site entrance(s) for the duration of the works.
- 25.INFORMATIVE - The Local Planning Authority's commitment to working with the applicants in a positive and proactive way is demonstrated by its offer of pre-application discussion to all, and assistance in the validation and determination of applications through the provision of clear guidance regarding necessary supporting information or amendments both before and after submission, in line with the National Planning Policy Framework.

Statutory Biodiversity Net Gain Informative

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition)” that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and*
- (b) the planning authority has approved the plan.*

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Rushmoor Borough Council until 30 April 2028 and North Hampshire Council from 1 May 2028.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed below.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements listed below are considered to apply.

The permission which has been granted has the effect of requiring or permitting the development to proceed in phases. The modifications in respect of the biodiversity gain

condition which are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 apply.

In summary: Biodiversity gain plans are required to be submitted to, and approved by, the planning authority before development may be begun (the overall plan), and before each phase of development may be begun (phase plans).

Statutory exemptions and transitional arrangements in respect of the biodiversity gain condition.

1. The application for planning permission was made before 12 February 2024.

2. The planning permission relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.

3. The planning permission was granted on an application made under section 73 of the Town and Country Planning Act 1990 and (i) the original planning permission to which the section 73 planning permission relates was granted before 12 February 2024; or (ii) the application for the original planning permission* to which the section 73 planning permission relates was made before 12 February 2024.*

4. The permission which has been granted is for development which is exempt being:

4.1 Development which is not 'major development' (within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015) where:

iv) the application for planning permission was made before 2 April 2024;

v) planning permission is granted which has effect before 2 April 2024; or

vi) planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 where the original permission to which the section 73 permission relates was exempt by virtue of (i) or (ii).*

4.2 Development below the de minimis threshold, meaning development which:

iii) does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and

iv) impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

4.3 Development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. A "householder application" means an application for planning permission for development for an existing dwellinghouse, or development within the curtilage of such a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse which is not an application for change of use or an application to change the number of dwellings in a building.

4.4 Development of a biodiversity gain site, meaning development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the Biodiversity Gain Planning condition which applies in relation to another development, (no account is to be taken of any facility for the public to access or to use the site for educational or recreational purposes, if that access or use is permitted without the payment of a fee).

4.5 Self and Custom Build Development, meaning development which:

i) consists of no more than 9 dwellings;

ii) is carried out on a site which has an area no larger than 0.5 hectares; and

iii) consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015).

** "original planning permission means the permission to which the section 73 planning permission relates" means a planning permission which is the first in a sequence of two or more planning permissions, where the second and any subsequent planning permissions are section 73 planning permissions.*

Irreplaceable habitat

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

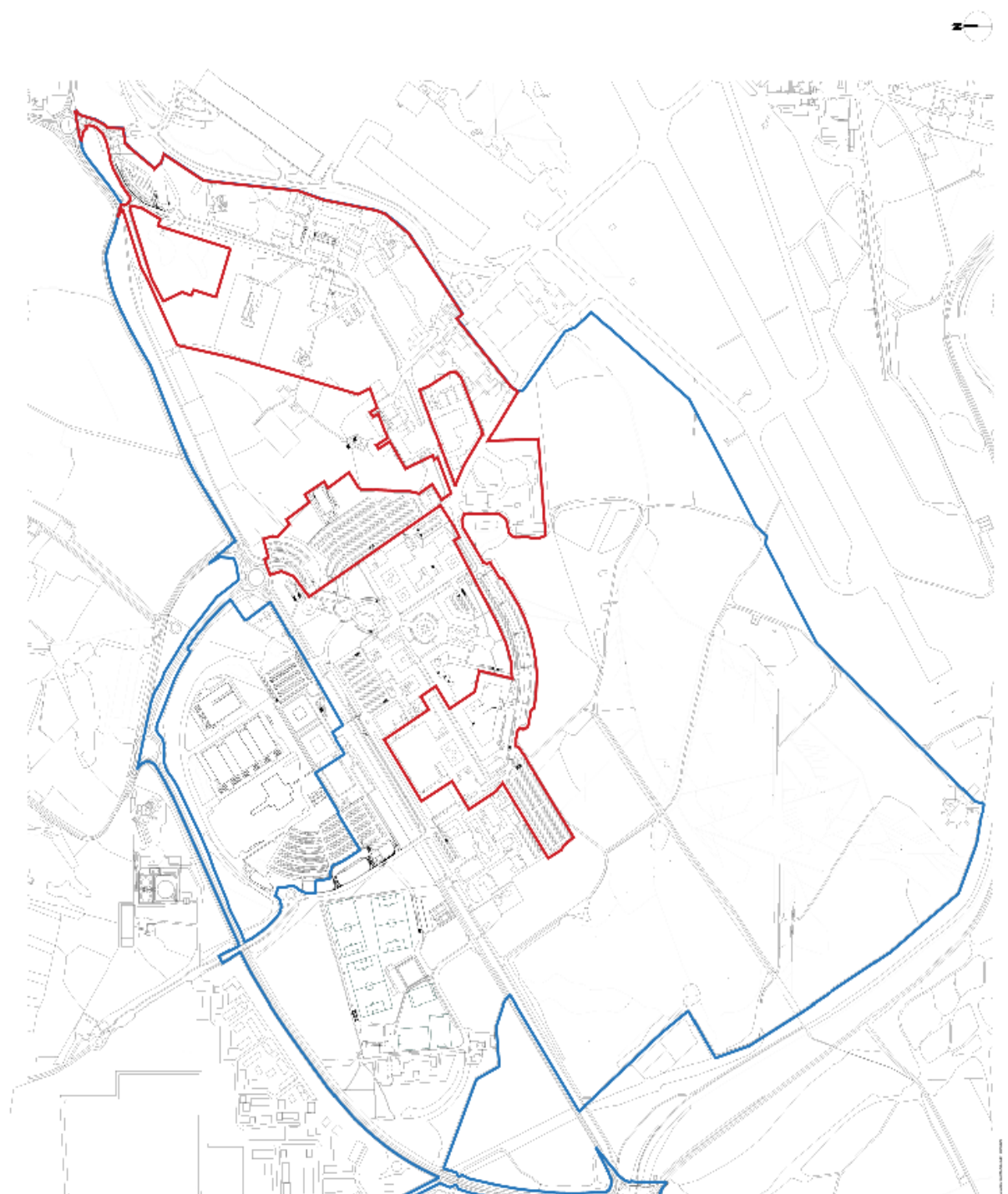
The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

The effect of section 73D of the Town and Country Planning Act 1990

If planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 (application to develop land without compliance with conditions previously attached) and a Biodiversity Gain Plan was approved in relation to the previous planning permission ("the earlier Biodiversity Gain Plan") there are circumstances when the earlier Biodiversity Gain Plan is regarded as approved for the purpose of discharging the biodiversity gain condition subject to which the section 73 planning permission is granted.

Those circumstances are that the conditions subject to which the section 73 permission is granted:

- i) do not affect the post-development value of the onsite habitat as specified in the earlier Biodiversity Gain Plan, and*
- ii) in the case of planning permission for a development where all or any part of the onsite habitat is irreplaceable habitat the conditions do not change the effect of the development on the biodiversity of that onsite habitat (including any arrangements made to compensate for any such effect) as specified in the earlier Biodiversity Gain Plan.*



Appendix 1 : Application Documents Table

Planning Application Documents

Document No.	Document	Received	Notes
1	Agents' Covering Letter	07/10/2025	
2	Arboricultural Impact Assessment	07/10/2025	Contains Tree Protection Plans as an Appendix
3	BNG Statement Form	07/10/2025	
4	BNG Draft Outline Habitat Management & Monitoring Plan	05/11/2025	
5	BNG Statutory Metric	07/10/2025	Included Existing & Post-Development Habitat Plans
6	Cultural Heritage Desk-Based Assessment	15/01/2026	Revised version : original received on 07/10/25
7	Design & Access Statement	07/10/2025	
8	Design Code (January 2026)	03/02/2026	Revised version : original received on 07/10/25
9	Economic Benefits Statement	07/10/2025	
10	Employment & Skills Plan	07/10/2025	
11	External Lighting Strategy	07/10/2025	
12	Flood Risk Assessment	07/10/2025	Incorporating Outline Drainage Strategy
13	Framework Construction Traffic Management Plan	27/01/2026	Revised version : original received on 07/10/25
14	Framework Travel Plan	30/03/2026	Revised version : original received on 07/10/25 and first revision 26/01/26
15	Habitat Assessment & BNG Strategy (2 Feb 2026)	03/02/2026	Revised version from original received 07/10/25
16	Habitats Regulation Assessment (2 Feb 2026) ; 'Shadow' document	03/02/2026	Revised version from original received 07/10/25
17	High-Level CNS Equipment Impact Assessment	07/10/2025	CNS = Communications, Navigations & Surveillance
18	Planning Statement	07/10/2025	
19	Response to Environment Agency consultation comments	01/12/2025	and also 14/11/25
20	Response to HCC Lead Local Flood Authority consultation comments	13/11/2025	
21	Response to EHO & Farnborough Airport comments	03/02/2026	
22	Solar PV Glint & Glare Assessment	07/10/2025	
23	Statement of Community Involvement	07/10/2025	
24	Sustainability & Energy Statement	07/10/2025	
25	Transport Assessment	07/10/2025	
26	Transport Assessment Addendum & Appendices A-M	27/01/2026	
27	Transport Technical Note TN05 : Mitigation Modelling Update	03/02/2026	Appending Hartland Park/Bramshot Lane TA
29	Transport Technical Note TN07 : Highway Comments Response	24/02/2026	Appendices contain plans for proposed off-site highway works
30	Transport Technical Note TN08 : Additional Assessment	05/03/2026	Contains Appendices
31	Transport Technical Note TN09	23/02/2026	Appendices contain plans for proposed off-site highway works
32	Transport Technical Note TN10	30/03/2026	Appendices contain plans for proposed off-site highway works & also TN06 also containing further appendices
33	Utilities Strategy Report	07/10/2025	
34	Written Scheme of Investigation for Historic Building Recording (February 2026)	10/02/2026	See also Document No.6 above

Appendix 1 : Application Documents Table

Environmental Statement Documents

Document No.	Document Title	Received Date	Notes
ES1	EIA Environmental Statement : Non-Technical Summary	07/10/2025	
ES2	EIA Environmental Statement : Volume 1 : Main Report	07/10/2025	
ES2.1	Chapter 1 : Introduction	"	
ES2.2	Chapter 2 : EIA Methodology	"	
ES2.3	Chapter 3 : Alternatives & Design Evolution	"	
ES2.4	Chapter 4 : Proposed Development	"	
ES2.5	Chapter 5 : Demolition & Construction	"	
ES2.6	Chapter 6 : Socioeconomics	"	
ES2.7	Chapter 7 : Traffic & Movement	"	
ES2.8	Chapter 8 : Air Quality	"	
ES2.9	Chapter 9 : Noise & Vibration	"	
ES2.10	Chapter 10 : Climate Change	"	
ES2.11	Chapter 11 : Ecology	"	
ES2.12	Chapter 12 : Ground Conditions	"	
ES2.13	Chapter 13 : Effect Interactions	"	
ES2.14	Chapter 14 : Likely Significant Effects	"	
ES2.15	Chapter 15 : Mitigation	"	
ES3	EIA Environmental Statement : Volume 2 : Landscape & Visual Impact Assessment	07/10/2025	Contains Appendices A-D
ES4	EIA Environmental Statement : Volume 3 : Technical Appendices	07/10/2025	
ES4.1	Introduction : Annex 1 : Table of Contents, Competent Experts & Relevant Expertise	"	
ES4.2	Introduction : Annex 2 : Location of Information within the ES	"	
ES4.3	Introduction : Annex 3 : Glossary of Terms & Abbreviations	"	
ES4.4	Methodology : Annex 1 : EIA Scoping Opinion Request Report	"	
ES4.5	Methodology : Annex 2 : EIA Scoping Opinion	"	
ES4.6	Methodology : Annex 3 : Cumulative Schemes List & Map	"	
ES4.7	Traffic & Movement : Annex 1 : Transport Policy	"	
ES4.8	Traffic & Movement : Annex 2 : Transport Data	"	
ES4.9	Air Quality : Annex 1 : Legislation, Policy & Guidance Documents	"	
ES4.10	Air Quality : Annex 2 : List of Cumulative Sites included in traffic data	"	
ES4.11	Air Quality : Annex 3 : Construction Dust Risk Assessment	"	
ES4.12	Air Quality : Annex 4 : Road Traffic Model Input & Methodology	"	
ES4.13	Air Quality : Annex 5 : Combustion Plant Model Input Data & Methodology	"	
ES4.14	Air Quality : Annex 6 : Combustion Plant Scenarios - Full Results	"	
ES4.15	Noise & Vibration : Annex 1 : Legislation, Policy & Guidance	"	
ES4.16	Noise & Vibration : Annex 2 : Noise & Vibration Survey	"	
ES4.17	Noise & Vibration : Annex 3 : Demolition & Construction Noise Analysis	"	
ES4.18	Noise & Vibration : Annex 4 : Highways Road Traffic Noise Details	"	
ES4.19	Noise & Vibration : Annex 5 : Use of Service Yards Analysis	"	
ES4.20	Noise & Vibration : Annex 6 : Use of Car Parks Analysis	"	
ES4.21	Climate Change : Annex 1 : Policy Review	"	
ES4.22	Climate Change : Annex 2 : Embodied Carbon Calculations	"	
ES4.23	Climate Change : Annex 3 : Operational Energy & Water Calculations	"	
ES4.24	Climate Change : Annex 4 : Transport Carbon Calculations	"	
ES4.25	Ecology & Biodiversity : Annex 1 : Badger Survey Methodology & Results	"	
ES4.26	Ecology & Biodiversity : Annex 2 : Bat Activity Survey Methodology & Results	"	
ES4.27	Ecology & Biodiversity : Annex 3 : Roosting Bat Survey Methodology & Results	"	
ES4.28	Ecology & Biodiversity : Annex 4 : Breeding Bird Survey Methodology & Results	"	
ES4.29	Ecology & Biodiversity : Annex 5 : Great Crested Newt Survey Methodology & Results	"	
ES4.30	Ecology & Biodiversity : Annex 6 : Hazel Dormouse Survey Methodology & Results	"	
ES4.31	Ecology & Biodiversity : Annex 7 : Reptile Survey Methodology & Results	"	
ES4.32	Ecology & Biodiversity : Annex 8 : Habitats Assessment & BNG Strategy	"	
ES4.33	Ecology & Biodiversity : Annex 9 : Terrestrial Invertebrate Survey Methodology & Results	"	
ES4.34	Ecology & Biodiversity : Annex 10 : Statutory Sites Plan	"	
ES4.35	Ecology & Biodiversity : Annex 11 : Sites of Importance for Nature Conservation Plan	"	
ES4.36	Ecology & Biodiversity : Annex 12 : Visitor Survey	"	
ES4.37	Ecology & Biodiversity : Annex 13 : Baseline Habitat Plan	"	
ES4.38	Ecology & Biodiversity : Annex 14 : Air Quality Technical Annex	"	
ES4.39	Ground Conditions & Land Contamination : Annex 1 : Legislative & Policy Context	"	
ES4.40	Ground Conditions & Land Contamination : Annex 2 : Preliminary Risk Assessment	"	

**APPENDIX 2 : Cody Technology Park – Planning Application reference 25/00537/OUTPP
Assessment of the Environmental Statement submitted with this planning application.
Supplementary report for the Development Management Committee**

1.0 Recommendation

- 1.1 That the Development Management Committee note the findings of this report (see sections 6 and 7) as it relates to the level of information submitted with the Environmental Statement (ES) submitted by NWS Planning (formerly Stantec) and its quality.

2.0 Introduction

- 2.1 This report reviews an ES that has been prepared and coordinated by Trium in conjunction with contributions from XLB, Stantec (now NWS Planning), Hoare Lea, Tyler Grange, Geo² and Envision on behalf of Pheonix DevCo S.à r.l (the Applicants) that is required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regs) in connection with the Cody Technology Park outline planning application.
- 2.2 It considers whether the ES has complied with the law with regard to its content to enable for the Committee to proceed to determine this case and thereafter reviews the adequacy of the information provided having regard to best practice and other policy requirements.

3.0 Background

Site and context

- 3.1 The site is of an irregular shape illustrated with Figures 1.1 and 1.2 in the Introduction Chapter of the ES Main Report (Volume 1) to be a red-lined area within a wider blue-lined area of land, denoting other land within the applicants' ownership and control not situated within the application site. Whilst the red-lined application site sits wholly within Rushmoor Borough Council's (RBC's) administrative area, parts of the blue-lined land cross the border into land within the jurisdiction of the neighbouring Local Authority, Hart District Council (HDC). The application site is therefore situated on the west margin of RBC's area and is part of an established employment area in a relatively isolated position approximately 1.9 km south-west of Farnborough Town Centre.
- 3.2 The application site is described as comprising "...several older office and industrial style buildings, access roads, pave at-grade parking areas, groups of trees and managed grassland" that is "....home to over 90 businesses and primarily consists of employment buildings of varying scales and business sectors in the defence, aerospace and high-tech industries. The redline boundary of the Site incorporates part of the existing Cody Technology Park campus...".
- 3.4 The description of the submitted planning application is:

"Outline planning application for phased development involving demolition of existing buildings and the erection of new flexible use employment floorspace (Use Classes E(g)(i)-(iii)/B2/B8 (including data centres) and associated works. All matters reserved except access."

3.5 A detailed description of the proposed development is set out in ES Volume 1 Chapter 4 (The Proposed Development), summarised as follows:-

- Detailed approval for 'Means of Access' is sought into and out of the Site via the Ively roundabout, off Ively Road; the Whittle roundabout, and Pyestock roundabout / Bramshot Lane, which currently provide access to the existing site and are to be retained to access the Proposed Development as detailed on the Access Plan (Drawing Reference: 11652_PL005);
- All other 'matters' relating to 'Scale', 'Layout', 'Appearance' and (the details of) 'Landscaping' are reserved for future consideration with Reserved Matters applications, with the Proposed Development defined with outline design Parameters Plans:-

Development Zone Parameters (Drawing Reference: 11652_PL003);
Access Plan (Drawing Reference: 1162-PL-005);
Strategic Landscape Plan (Drawing Reference: 11652-PL-006); and
Demolition Plan (Drawing Reference: 11652-PL-007).

- The nature of the proposals is further defined by a Design Code document (revised version January 2026) that is also to be determined at the outline stage;
- The Proposed Development is comprised of the following key components:
 1. Up to 143,000m² Gross External Area (GEA), broken down by Development Zones into:
 - Development Zone 1 (Ball Hill – Industrial Research and Development);
 - Development Zone 2 (Ball Hill - Data Centre Campus);
 - Development Zone 3 (Headquarters Development (i.e. QinetiQ HQ); and
 - Development Zone 4 (Data Centre Campus).
 2. Buildings will range in height, depending on the Development Zone with a maximum building height for each as follows:
 - Development Zone 1: 20m (89.40m AOD);
 - Development Zone 2: 22m (89.05m AOD);
 - Development Zone 3: 25m (101.43m AOD); and
 - Development Zone 4: 22m (97.81 AOD).
 3. Public realm and open space; and
 4. Car parking to be provided in accordance with adopted local standards.

Requirements of an ES

3.6 Regulation 4(2) of the EIA Regs states that an ES must identify, describe and assess the direct and indirect significant effects of the proposed development on the following factors—

- (a) population and human health;
- (b) biodiversity, with particular attention to species and protected habitats;
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in paragraphs (a) to (d); and
- (f) any additional information relevant to the specific characteristics of the site and proposal.

3.7 The ES must identify the operational effects of the proposed development, where the proposed development will have significant effects. This can sometimes be pertinent for

projects with extended lead times to build out and then operate such as nuclear power stations or sites that will be “in operation” for long periods of time such as landfill sites. Further, it must assess the cumulative effects of the proposal it promotes alongside other schemes in the vicinity. This will be pertinent for matters such as traffic but also the impacts on air quality and the Thames Basin Heath Special Protection Area (TBHSPA).

- 3.8 The council has authority under Regulation 15 of the EIA Regs to identify (“scope”) the detailed topics the ES must cover and the topics that can be “scoped out” following consultation with a number of consultees¹. It did so in an 2025 EIA scoping opinion². This opinion determined that the following topics must be scoped-in to the ES:

- Air Quality;
- Climate Change and Greenhouse Gases;
- Ecology and Biodiversity;
- Ground Conditions;
- Landscape and Visual Impact Assessment;
- Noise and Vibration;
- Socio-Economics; and
- Transport and Movement.

And the following topic areas were scoped-out : Archaeology (buried heritage); Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare; Water Resources and Flood Risk; Human Health; Materials and Waste; Project Vulnerability; Built Heritage; and Wind Microclimate.

- 3.9 Based on the expert advice from technical consultees it received, the Council agreed that the ES did not need specifically to cover archaeology and Flood Risk, but the applicants have submitted studies or given explanations about these topics as part of the planning application in the usual way. The site is previously developed land and there is therefore no need to provide information on agricultural land quality.
- 3.10 In addition to information on biodiversity and ecology, the Applicants were obliged to submit a Shadow Habitats Regulation Assessment (HRA). This – and other documents that form part of the planning application – are assessed in the main part of the report to Committee. The Shadow HRA was subject to amendment in February 2026 following consultee comments.
- 3.11 Before the Committee determines this application, it must be satisfied that the ES has addressed the legal requirements set out above and, further, that there is sufficient information in the ES on the scoped-in matters to enable it to assess the likely significant effects of the application proposal and therefore to determine the case. The council also has powers to ask the Applicants to supply more information under Regulation 25 of the EIA Regs. This report therefore addresses the level of information submitted as well as its quality.
- 3.12 As is required with planning applications accompanied by an Environmental Statement, the applicants’ agent notified the Secretary of State of the Ministry of Housing, Communities & Local Government of the submission and validation of the outline planning application and

¹ Natural England, internally with Rushmoor Borough Council (Environmental Health, Ecology, Employment & Skills & Arboricultural Officer), the County Council (Highways, Local Lead Flood Authority, Archaeology), Thames Water, Farnborough Airport, Defence Infrastructure Organisation, Gas, Electricity & Hart District Council.

² Decision letter dated 18th July 2025 – reference 25/00328/SCOPE

ES on 14 October 2025 and received an automated email acknowledgement of receipt from their Planning Casework Unit on the same date. The Ministry has not made any further response since.

Structure and content of the ES

- 3.13 The ES comprises three volumes of technical reports and analysis alongside a non-technical summary which is required by Schedule 4 to the EIA Regs. The following sections of this report summarise the contents of the ES.
- 3.14 Volume 1 contains the Main Text and Figures. It sets out the structure for the preparation of the ES (Chapter 2 : EIA Methodology) including consideration of alternatives and the evolution of the scheme (Chapter 3). Chapter 5 covers the demolition and construction methodology and programme. Chapters 6 to 12 cover the various topics included in the ES. Chapter 13 considers possible effect interactions; Chapter 14 provides a summary of the likely significant effects that the research underpinning the ES has raised; and Chapter 15 summarises the proposed mitigation. Volume 2 comprises a Landscape & Visual Impact Assessment (LVIA) of the proposals; and Volume 3 contains the Technical Reports that support Volumes 1 & 2. Volume 3 contains Technical Appendices supporting, as required, the Topic Area chapters of Volume 1.

Volume 1

- 3.15 **Chapter 2** describes the methodology for preparing the ES. It confirms that public consultation took place as the project was being developed. It states the scope of the ES and technical studies that inform it were prepared based on consultation with relevant technical and other stakeholders. By establishing Parameter Plans describing the maximum extent of development for each of the proposed Development Zones, it is possible to establish the likely effects of the proposal. The applicants purport to assess the worst-case scenario when assessing the likely significant effects of the proposals having regard to any 'sensitive receptors' that are identified. It is acknowledged that the outline nature of the proposals requires a number of reasonable assumptions to be made since detailed information about the proposals is not available; and that there are, as a result, necessarily limitations to the analysis undertaken as a result. Each technical report contains a baseline condition report, likely significant effects, mitigation measures, cumulative effects and a summary thereafter. The technical reports identify the magnitude of the effect, the sensitivity of any receptor and the significance of the effect. Any adverse effects identified have then been considered for any avoidance/mitigation in the design process. The ES states that cumulative effects have been identified, taking into account 6 major schemes inside Rushmoor and in Fleet (Hart District Council). In this respect it is noted that, since the application and ES was submitted, there have been some changes to the cumulative schemes, with the withdrawal of the more recent Hartland Village application (Ref: 25/00478/OUT) and an application for a new leisure centre (Ref: 25/00583/FULPP) involving some of the land that was part of the, to date, undetermined Farnborough Civic Quarter application (Ref.22/00193/OUTPP), which indicates that the FCQ application is now unlikely to come forward in the form originally envisaged, if at all.
- 3.16 **Chapter 3** considers alternatives and design evolution. Three alternatives have been identified and rejected. These are: "do nothing"; an alternative site for the development; and alternative designs/layouts for the proposed development. The applicant states that the submitted scheme has been developed and evolved formed by a desire to regenerate the site and as a result of the findings of community engagement and pre-application

consultations; and the resulting detailed design is a carefully considered response to the various constraints of the site that has addressed matters such as ecology & biodiversity, landscape & visual impacts, transport infrastructure, noise & vibration and potential land contamination.

- 3.17 **Chapter 4** describes the site and proposals in detail, identifying building heights and maxima for floorspace; and the creation of a hierarchy of Since this is an outline application, matters such as the amount of construction materials cannot be quantified. Relevant parameter-defining plans are attached that identify spatial and maximum scale parameters for the identified development plots; and how the different Development Zones and Plots within would be accessed. A Design Code document has been submitted (in revised form received on 2 February 2026) in order to lock-in further elements of detailed design in a document that is also proposed for approval at the outline stage.
- 3.18 **Chapter 5** (Demolition & Construction) describes the anticipated construction methodology, construction sequencing and indicative construction programme for the proposed development. It is assumed that it will take will take eight years to build-out starting in Q4 of 2026. Construction will take place over four distinct main phases. There will be measures in place to protect the site and nearby residents and other neighbours during construction (a Construction Environmental Management Plan (CEMP). Working hours will be agreed with the Council through the CEMP, but indicated that it is likely that standard hours of work would be adhered to, namely 8am-6pm Mondays to Fridays, 8am to 1pm Saturdays, and no noisy activities on Sundays or Bank Holidays if any working takes place then at all.
- 3.19 **Chapter 6** (Socio-Economics) seeks to assess the social impacts of the development in respect of jobs and employment, economic output, wages and skills in respect of both the construction phase of the proposed development, but also the operation of the completed development thereafter. The main conclusions are that the likely significant effects would be moderate beneficial impacts in terms of jobs and employment and economic output. It is considered unlikely that there would be cumulative impacts in these respects arising from the identified other major development schemes – and this conclusion is reinforced as a result of the withdrawal of the Hartland Park application and the significant scaling-back of RBC's ambitions for the Farnborough Civic Quarter.
- 3.20 **Chapter 7** (Traffic & Movement) and its technical appendices sit alongside a detailed Transport Assessment (TA) also prepared by Motion that has also been submitted with the planning application. The TA identifies likely impacts having regard to the baseline position (as of March 2025) and likely future baseline position at envisaged completion of the proposed development (2040) along with the cumulative impacts of this development alongside other major developments on the road network. The Highway Authority (Hampshire County Council : HCC) has indicated in response to consultation their support for the proposals in principle subject to various technical aspects being resolved. In this respect, amendments and additions to the TA in the form of an Addendum were submitted on 27 January 2026 in response to comments/requests for more information made by HCC on 8 December 2025. These combined further TA documents are accompanied by a substantial amount of appendices in respect of, inter alia, trip generation, junction modelling, and a revised Framework Travel Plan (FTP) containing measures that promote use of transport modes other than the car and reduce reliance on the private car; and identifies initiatives to be undertaken to promote other forms of transport and thereby mitigate the impact of the proposed development on the road network. The FTP would be secured via a s106 agreement.
- 3.21 HCC has further responded to re-consultation following the receipt of the TA Addendum by letter dated 18 February 2026 to query the floor area mix assessed within the TA as a result

of the concern that higher trip generation than that modelled by the TA could arise in the event that a greater proportion of DZ1 of the development were to be in Class E use than envisaged. In the very extreme, considering the full flexibility in terms of the mix of uses that is being sought by the applicants, HCC consider that, if all of the development within DZ1 were to come forward as Class E use, this could result in close to 280 additional two-way vehicular trips in the AM peak compared to what has been assessed : a significant extra amount of traffic generation on adjoining roads. As such, in respect of DZ1 alone, HCC do not consider that the worst-case has been considered. However, concern is also expressed in respect of the data centres proposed for DZs2 & 4 on the basis of the possibility that, as a worst-case not considered by the TA, were these to be developed as conventional B8 uses rather than primarily as data centre uses, this would also be likely to generate substantially more traffic than modelled with the TA, further increasing traffic volumes on surrounding roads within the public highway network. HCC has advised that they accept that DZ3 can be assessed as a like for like replacement of QinetiQ, such that the current TA modelling in this respect is agreed.

3.22 Following the submission of amended and additional highway submissions, HCC confirmed by letter dated 7 May 2026 that they had no highway objections to the proposals subject to:-

- conditions mirroring those requested by National Highways at the end of April 2026 (to require submission of a Construction Traffic Management Plan and Operational Management Plan to be approved in respect of each phase (or part thereof) of the proposed development; and
- completion of a s106 Agreement to secure/require an Active Travel Modes financial contribution; off-site highway improvement works or a further financial contribution; on-site improvement works to upgrade existing shuttle bus facilities; Travel Plan evaluation, adoption and monitoring, including monitoring and evaluation fees and bonds; and a bus shuttle service to be implemented.

3.23 **Chapter 8** (Air Quality) in respect of NO₂, PM₁₀ and PM_{2.5} is supported by six appendices (Volume 3, Appendix Air Quality Annexes 1-6) that seeks to assess the likely significant air quality effects associated with the proposed development. The application site is not situated within an Air Quality Management Area (AQMA) and the area surrounding the application site (indeed, the entire Borough) is currently compliant with the Air Quality Objectives based on a review of existing monitoring data. Potential impacts on air quality as a result of the proposed development are identified to arise in respect of increased road traffic on the local road network. Air quality dispersion modelling has been used to quantitatively assess the impacts of operational phase traffic flows on existing human (nearby residents and also users/occupiers of the proposed development) and ecologically-sensitive receptors. Additionally, the proposed development includes provision of data centres that are thought likely to require diesel generators for back-up power and, as a worst case, it is assumed that this could necessitate up to 80 separate generators that would have to be periodically run-and start-tested and maintained even if not actually required to be run because of a power outage. A combination of the air quality impacts arising from both road traffic and the generators has been assessed; also having regard to the indicative sequencing of the construction phases of the proposed development. The assessment methodology was prepared in consultation with Natural England (with particular regard to the TBHSPA) and the Council's Environmental Health Team; and modelled assuming the maximum extent of development proposed against baseline air quality conditions (assuming a 'likely evolution' over time) on the basis of the planned expansion of flight numbers at Farnborough Airport.

- 3.24 The research also assesses impacts on the SPA (off-site traffic generation) as well as more localised impacts during construction on neighbours and models post-construction air quality for future occupants of the development. It states that additional traffic movements would be below the screening threshold for the TBHSPA, and would have a negligible/ not significant impact on it. Off-site impacts through the demolition/ construction stages would be mitigated via a CEMP and there would, accordingly, be negligible/not significant impact on human health.
- 3.25 The Council's Environmental Health Team (EH) have raised a number of queries in respect of the ES Air Quality chapter (8) and a response was received from the Applicants on 19 December 2025. Firstly EH noted that the referencing of the annexes to Chapter 8 contained a number of typographical errors, however these have now been corrected with an Errata Sheet. Secondly, EH initially raised concerns that not all particulate matters had been modelled : it appeared that PM10s had been considered, but not PM2.5s, which have a greater potential to impact on respiratory health. Clarification was sought from the applicant as to the rationale for this and the clarification provided that, if modelling concludes the annual mean PM10 emission figures are below the PM2.5 Air Quality Standards, it follows that the PM2.5 emissions should be acceptable - a clarification that has been accepted. Therefore, based upon the anticipated negligible impact of PM10s upon surrounding relevant receptors, it is considered that no further modelling with respect to PM2.5s is necessary.
- 3.26 Thirdly, EH has questioned the worst-case assumptions made concerning the operation of the diesel back-up generators assumed likely to be required with the proposed data centres on the basis that a worst-case scenario of a 72-hour power outage (i.e. a longer time period within which the back-up generators would need to be running) should be considered. The need for fuel storage to serve the back-up generators has also been questioned. However, in response, the applicants' agents do not consider that the 72-hour power outage scenario is likely or reasonable. Furthermore, back-up generator plant would be subject to an entirely separate Environmental Permit licencing regime by the Environment Agency outside of Planning. Nonetheless, it is clear from this exchange that particular attention will need to be paid to addressing and mitigating the potential air quality impacts of back-up generator requirements for the proposed data centres in considering the planning application; and, indeed, whether it would be appropriate, and in what ways, to impose conditions for consideration in this respect at Reserved Matters stage.
- 3.27 The Council's Ecology Officer also raised queries concerning Chapter 8 and its associated annexes in terms of the presentation of the air quality data to aid understanding of the potential effects upon the adjoining Eelmoor Marsh SSSI and SPA. The potential air quality impact of back-up generators with the data centres was also raised. The requested clarification and information has subsequently been provided by the Applicants. In terms of atmospheric nitrogen deposition (Ndep) critical load and atmospheric nitrogen oxides (NOx) critical level, the Ecology Officer notes that the data and modelling presented by the Applicants in respect of worst-case back-up generator usage combined with road traffic indicates that 8.7 ha of the SPA would be elevated above 1% of the NOx critical level, which is just 0.11% of the total area of the TBHSPA exposed to elevated concentration of NOx. The most pertinent adverse effect on the integrity of the SPA in this respect is the potential deterioration of habitats supporting the qualifying bird species, although there is currently no measure or standard defining the limits of 'significance' or 'insignificance' with respect to the loss or deterioration of SPA habitat. However the Ecology Officer notes that NE Report NECR205 states that "where the spatial extent of the affected area is small then the risk to the integrity of the site needs to be approached in a reasonable and proportionate manner"

and “In the case of small-scale effects on a supporting habitat for a species, the decisions reviewed suggest it is the ecological functioning of that supporting habitat which is most influential.”. On this basis, and noting that the SPA is currently in favourable condition, does not show any obvious signs of habitat deterioration currently and is meeting its ecological function requirements, the Ecology Officer concludes that it would be reasonable and proportionate to conclude that modelled NO_x emissions as a result of the proposed development would not have an adverse effect on the integrity and conservation objectives of the SPA.

- 3.28 With respect to atmospheric nitrogen deposition (Ndep), the modelling presented by the Applicants shows that background Ndep levels would also exceed the recommended critical load for the relevant vegetation types found at Eelmoor Marsh SSSI and SPA as a result of the proposed development likely to contain back-up diesel generators for the data centres. In this respect, Ndep is predicted to exceed 1% of the critical load over an area of 5.2 ha of the SPA locally, representing 0.06% of the total area of the TBHSPA. For the same reasons as considered for NO_x, the Ecology Officer considers this impact to be marginal, also noting that the management regime for Eelmoor Marsh has a focus on effective grazing that helps with nutrient reduction; and that the worst-case scenario in respect of back-up generators leaves room for some reductions in emissions to be achieved with the detailed design of the data centres and their attendant back-up power supplies in terms of number, location and specification at Reserved Matters stage.
- 3.29 **Chapter 9** (Noise & Vibration) is, in effect, accompanied by the components of a noise impact assessment supported by 6 annexes within the Technical Appendices. This assesses noise impacts from road traffic, construction traffic and activity, including in combination with Farnborough Airport operations. The nearest residential receptors reside at Nos.128-130 Old Ively Road close to the Whittle Roundabout. The impacts upon the sensitive ecological receptors of the adjacent Thames Basin Heaths Special Protection Area (TBHSPA) are also included in the Assessment as requested by the Council’s Ecology Officer and EIA Screening stage. The following key considerations have been identified:-
- Potential noise and vibration (ground-borne) generation through the demolition and construction stage of works;
 - Potential noise generation from the worst-case proposed planning Use Class (B2 and B8) for each Development Zone;
 - Use of external service yards for unloading and loading HGVs via diesel power forklifts with audio reversing warning beacons both daytime and at night;
 - Use of external car parks for each Development Zone both during daytime and at night;
 - Cumulative effects with identified cumulative schemes, mainly Farnborough Airport;
 - Existing sensitive receptors identified include both human and ecological receptors, with assessment criteria allocated for both; and
 - The future introduced sensitive receptors include the Development Zones and a recommended extension by others of the Ball Hill Site of Importance for Nature Conservation (SINC) by Hampshire SINCS Advisory Panel.
- 3.30 The methodology for the Assessment was agreed by the Council beforehand. Similar to the assessment of air quality, noise and vibration impact was assessed against an existing evolving baseline of noise and vibration conditions; and predictions made about cumulative future noise emissions based upon the indicative sequencing of development, the maximum

extent of development proposed and likely noise emitters within the proposed development once operational.

- 3.31 The findings of the Assessment are that the proposed development is expected to have temporary moderate adverse effects on nearby sensitive receptors due to demolition and construction activity. These effects would, however, be limited to the closest parts of each sensitive receptor at shared boundary locations, and that effect reduces with separation distance from the noise source(s). It is not predicted that the cumulative effect of demolition and construction activity associated with any of the other major schemes identified with the ES would be significant due to the separation distances between the major developments involved. In this respect, the original Hartland Park development continues to be built-out at present, but an application proposing additional dwellings there has been withdrawn; and the nearest other major proposed development at FCQ at Farnborough town centre is not currently going ahead.
- 3.32 In terms of operational noise, the predicted noise contribution from the proposed development at the end of year 8 (Q4 2034) is assessed to be negligible and, crucially, 10 dB(A) [an order of magnitude] lower than that generated by airport/aircraft noise. As a result, it is concluded that the operation of the proposed development would have a not significant negligible impact upon cumulative noise levels when considered together with the operation of the adjoining Farnborough Airport. As with construction impacts, the cumulative impact when considered alongside other major developments considered by the ES is not considered to be significant due to the separation distances involved.
- 3.27 It is concluded that the other noise & vibration generating impacts are generally negligible (and at worse, for the nearest neighbours, minor adverse) and universally not significant. Accordingly, it is concluded that these matters could be satisfactorily addressed at Reserved Matters stage through noise mitigation measures such as acoustic glazing/ventilation, acoustic attenuation/insulation measures, and noise management measures.
- 3.28 The Council's Environmental Health Team acknowledge that the assessment is limited by the fact that the design is at an early stage and there is only an indicative site layout in place. A direct, local, temporary, short-term moderate adverse significant effect is predicted for the nearest residential properties. Nevertheless, impacts of the construction period of a development cannot be taken into material account in determining planning applications as a result of long-standing Government guidance. Accordingly, the imposition of a condition requiring the submission, approval and implementation of a Construction Environmental Management Plan (CEMP) is considered to be an appropriate response.
- 3.29 The Council's Ecology Officer notes that a threshold level of 69.9 dB L_{Amax} has been accepted previously by the Council and Natural England and used as a threshold above which noise levels result in unacceptable disturbance to birds within the Thames Basin Heaths SPA - being a threshold above which a behavioural response in the birds is likely. Disturbance effects are the primary cause of breeding failure for the qualifying bird species in respect of the SPA and suitable nesting habitat to support these species exists at Eelmoor Marsh up to the boundary of the application site. Noise modelling has been undertaken on behalf of the applicants that seeks to predict the worst-case extent of noise levels that robustly considers demolition and construction activity taking place within all DZs concurrently with all plant operating simultaneously. Assumptions are made concerning the operation of a framework CEMP and the sound levels that various items of plant and equipment would emit. Given that the sensitivity of the Eelmoor Marsh SSSI & SPA to noise is high, and the magnitude of impact also high, it is predicted that the SPA would be subject to direct, local, temporary medium-term effects that are considered significant major adverse in respect of DZs 1 & 4, being the closest DZs to the SPA. Accordingly, the need for secondary mitigation is identified to reduce

noise emissions are reduced to a level of 70 dB at the boundary with the Eelmoor Marsh SPA. The Ecology Officer notes the suite of potential noise reduction measures within the Applicants' Shadow Habitats Regulation Assessment and is content the appropriate measures be secured by imposition of condition.

- 3.30 **Chapter 10** (Climate Change) provides a Greenhouse Gas (GHG) assessment for the proposed development undertaken in accordance with best practice guidance from the Institute of Environmental Management and Assessment (IEMA) for Assessing Greenhouse Gas Emissions and Evaluating their Significance (2nd Edition), February 2022. There is no statutory guidance on the assessment of climate change issues, however the IEMA guidance is generally considered to be current best practice. This chapter is supported by 4 annexes within the Technical Appendices. As is the case for all development activities, the proposed development will, directly and indirectly, release GHGs into the atmosphere during both its construction and operational phases. However, these are concluded to be minor adverse and, therefore, not significant in accordance with IEMA guidance on the basis that the proposed development lifetime carbon emissions would be small compared with the UK National budgets and, indeed, compliant with all current policies relating to GHG and climate change. The proposed development would, furthermore, emit carbon more efficiently than existing buildings at the site to be replaced. The main source of GHG emissions that is identified (74% of the total) relates to consumption of electricity, albeit this expected to reduce over the lifetime of the development as a result of measures being implemented through Government policy to de-carbonise the National Grid, based on a balanced net-zero pathway. The development of data-centres is supported by national planning policy for the growth of the digital economy.
- 3.31 **Chapter 11** (Ecology & Biodiversity) is accompanied by a total of 14 Annexes within the Technical Appendices that address the developer's other legal obligations – most notably the Conservation of Habitats and Species Regulations 2019 as they relate to the TBHSPA; and the Wildlife and Countryside Act 1981 which protects SSSIs - as well as those of the EIA Regs. The ecology and biodiversity studies were informed by a workshop between the Council's Ecology expert and other ecology specialists. The studies assess the site's current ecological value in terms of badgers, bats, roosting bats, breeding birds, great crested newts, hazel dormice, reptiles and terrestrial invertebrates. There are also a Habitat Assessments & Biodiversity Net Gain Strategy (30 September 2025) (Annexe 8), together with plans for the Statutory (TBHSPA & SSSI) and Non-Statutory (SINC) conservation sites; visitor survey data; a Baseline Habitat Plan; and air quality technical data. It is noted that the Habitat Assessments & BNG Strategy (30 September 2025) document was also separately submitted with the planning application together with other BNG submissions in order to comply with the statutory planning application validation requirements of the BNG Regulations. Furthermore, this document was recently amended and submitted to replace the original document in 2 February 2026 in order to address consultation comments made by the Council's Ecology Officer concerning the presentation of noise and air quality material in the assessment of the impact on wildlife sites adjoining/near the application site.
- 3.32 The Council's Ecology Officer has examined the ES in detail, including the ES Chapters relating to noise, demolition & construction and air quality in addition to Ecology & Biodiversity (11).
- 3.33 **Chapter 12** (Ground Conditions & Land Contamination) is supported by 2 annexes in the Technical Appendices that set out the legislative and policy context relating to this topic area (Annex 1) and provide a Preliminary Risk Assessment (PRA) (Annex 2). The key impacts of the proposed development that are considered potentially significant in terms of ground conditions and contamination are:-

- Potential contamination of surface water, groundwater (there is an underlying Secondary A Aquifer) and soils from historical MoD/defence uses of parts of the site, which include a former aircraft disposal ground with associated radiological contamination, explosives testing, chemical /hazardous substances storage, and also a former travellers' camp;
- Potential for construction/demolition workers to be exposed to unexploded ordnance, chemical and radiological hazards due to historic MoD/defence uses; and
- Potential for contamination to be mobilised to affect the adjacent Eelmoor Marsh SSSI/TBHSPA and watercourses downstream.

- 3.34 Assessment of the potential effects of the demolition and construction phase has been undertaken in accordance with the Environment Agency's Land Contamination: Risk Management (LCRM) framework, the Environmental Protection Act 1990, Institute of Environmental Management & Assessment (IEMA). Potential existing ground contamination has been identified in the conventional industry-standard manner, which is through review of an Envirocheck report, historical mapping, planning history, third-party desk-based/ground investigation data (for unexploded ordnance and radiological material and involving intrusive survey with boreholes and trial pits) and a site walkover. By these combined means the PRA establishes the existing baseline ground conditions and identifies contaminant sources and, thereby, contaminant pathways and receptors (and their sensitivity). As is standard practice, a Conceptual Model has been developed within the PRA in order to identify the significance or otherwise of potential contamination linkages using the source-pathway-receptor linkage approach; i.e. ways in which the construction of the proposed development could mobilise existing contamination into the environment and impact upon identified receptors. Since contamination is located in the ground, only demolition and construction works involving disturbance of the ground have been considered in the assessment. Furthermore, the assessment does not consider effects which might interact with receptors other than long-term human health, soils, groundwater and surface water.
- 3.35 Given the outline nature of the application proposals, the nature and limitations of both desk-top assessments (such as ambiguous or incomplete historical information) ground sampling, and the variability of groundwater conditions seasonally (and therefore the time-bound nature of any observations), it is acknowledged that a number of assumptions have had to be made to enable an assessment to be undertaken. Nevertheless, it is noted that the assessment should be reviewed and updated as necessary as the implementation of the development proceeds as site-specific information become available to better inform and/or validate the assessment. This approach is unavoidable and conventional. The assessment has taken account of a nominal construction sequencing as shown in Chapter 5 (Demolition & Construction), assumes the implementation of a Construction Environmental Management Plan (CEMP), and considers the worst-case scenario of maximum possible ground disturbance within the limits indicated by the submitted Parameter Plans with particular focus on localised areas of known contamination.
- 3.36 Once the proposed development is operational, it is considered that the risk of exposure of receptors to ground contaminants would be much reduced due to the various mitigation and avoidance measures incorporated into the development, such as hardstanding, clean-cover systems and protected/upgraded drainage and drinking water supply infrastructure. In this respect, assessment of the operational use of the completed development has taken account of a typical range of embedded design measures to either isolate the development from potential contaminant pathways and/or through the installation of permanent mitigation measures to isolate potential receptors from contaminated ground within the new

development. Sensitive ecological features (the adjacent SSSI/SPA and SINC and associated watercourses) would be protected from hazardous chemicals/materials that may be used by occupiers of the proposed development through appropriate storage/management under the Control of Hazardous Substances Regulations (COSHH); together with, as necessary, operational hydrological controls such as drainage isolation and run-off controls such as interceptors.

Volume 2 : Landscape & Visual Impact Assessment

3.37 This Topic Area occupies an entire Volume of the ES and describes the landscape and visual sensitivity of the application site in order to identify likely landscape and visual effects that may arise as a result of the proposed development. The LVIA has three basic objectives:-

- To appraise the landscape character and quality of the application site and its context, together with its function within its wider setting;
- To appraise the visibility of the application site and the nature and quality of existing views towards the application site; and
- To assess the likely effects upon landscape character, landscape features and visual amenity that would arise as a result of the proposed development - which includes the demolition and construction phases.

The LVIA is accompanied by 4 large-format Appendices A-D. Appendices A and B set out the LVIA Methodology and Published Evidence Extracts respectively. Appendices C and D are Site Appraisal and Site Context Photographs that display panoramic photographs taken (a) within the site to record its appearance for the baseline; and (b) views towards the application site from a collection of 20 near and far potential publicly-accessible viewpoints of the application site respectively. Reference was made to Natural England, Rushmoor BC and Hart DC documents describing and categorising the landscape character of the areas around the application site and, indeed, using these to identify some of the viewpoints (actual or theoretical) and to attribute landscape value and sensitivity to them with which to assess changes in their visual context as a result of the proposed development.

3.38 The methodology that is employed in producing the LVIA is an industry standard and is based on Natural England publication GLVIA3 “An approach to Landscape Character Assessment”. The LVIA has considered the maximum and worst-case scale of the committed elements of the development that are defined by the ‘control documents’ of the outline planning application, namely the description of the proposed development, Parameter Plans, and the Design Code document proposed for determination at the outline stage. These are compared against a baseline assessment to establish the extent of any landscape and visual effects predicted to arise. A realistic worst-case scenario is obtained from considering the landscape and visual effects with any landscape planting only just planted and not yet grown and established. Residual best-case landscape and visual impacts are assessed against the baseline by extrapolating the appearance of 15 years of landscape planting growth into maturity. Judgements of the landscape and visual effects are subjective and made informed by field observations, but are illustrated in the LVIA using photographs. Seasonal effects are taken into account, with field observations undertaken in both summer and winter in order to understand the extent to which trees and vegetation impact upon views towards the application site. All of the 20 viewpoints examined by the LVIA are considered to provide a comprehensive selection of near and far viewpoints of the application site - and all have been visited in reviewing the LVIA for this report. It is considered that they capture a representative sample of the range of publicly-accessible locations from which the proposed development would be seen, such that it is possible to discern and consider the visual significance and impact of the proposals.

- 3.39 The LVIA demonstrates that the application site is visible primarily in near distance views (i.e. within 100 metres), such as from viewpoints within the wider Cody Technology Park and the adjacent Farnborough Airport, with more fleeting partial views from Ively Road and Elles Road. This arises from the topography of the site and the nature of its surroundings : the topography of the application site is gently sloping and is at an elevation similar to its immediate surroundings. The land in question is relatively low-lying with more pronounced topography some distance to the south, east and west and woodland cover is characteristic of the land surrounding and enclosing much of the site from full view. As a result medium distance (i.e. 100-500 metres) views of the site are, at best, partial and heavily ‘filtered’. Longer distance (i.e. 500 metres plus) views towards the application site, such as from Caesars Camp, reveal a landscape that generally appears to be heavily wooded through which the upper parts of larger buildings can be glimpsed. A number of landscape and visual receptors were scoped out where the impact was assessed as being insignificant or non-existent. These notably include the Southwood Amenity Open Areas, residents of properties on the edge of Fleet, residents of Hartland Village, workers at businesses on the western edge of Farnborough, users to Templar Avenue and Fowler Avenue and users of Watts Common (largely the Army Golf Club).
- 3.40 In conclusion, the LVIA identifies just 4 landscape receptors and one visual receptor that would be subject to significant adverse effects as a result of the proposed development - and this would be limited to the demolition and construction phase only. The landscape receptors are all in the vicinity of the application site itself and/or because the site is rendered visible to and from them by virtue of adjoining the large intervening open expanse of Farnborough Airport: namely the overlapping landscape areas of Thames Basin Heaths SPA; Eelmoor Marsh SSSI; NE Hampshire Landscape Character Area (LCA) 1b “woodland and plantation on heath” also containing the SPA and SSSI areas plus the adjoining SINCS; and military training lands that are further “heathland and forest” within Rushmoor LCA 9. The visual receptors subject to significant adverse impact during the demolition and construction phases are workers located within the parts of Cody Technology Park to be retained and the immediate environs of CTP South. The LVIA notes that visual mitigation measures embedded within the design of the proposed development, namely the strategic landscape proposals, would quickly soften the adverse effects.
- 3.41 It is concluded that none of the identified landscape and visual receptors would be subject to significant adverse impact as a result of the proposed development once completed and operational, even when the structural and other landscaping is still new. It is considered that there would be some beneficial effects arising from the replacement of some older buildings with newer structures combined with the strategic and structural planting that forms part of the committed proposals. Further it is concluded that there would be no significant and adverse cumulative landscape and visual impacts arising due to the significant landscape and visual separation between the proposed development and the other major developments that may arise in a similar timescale.

Volume 1 Continued

- 3.42 **Chapter 13** (Effect Interactions) summarises the likelihood for in-combination effects due to interactions between multiple individual effects. **Chapter 14** (Likely Significant Effects) presents a summary of the likely significant environmental and socio-economic effects of the proposed development during its construction phases and, thereafter, once complete and in operation.
- 3.43 No significant residual effects are considered to arise as a result of demolition and construction works having regard to Transport & Movement, Air Quality, Climate Change, Visual Impacts and Ground Conditions. However, significant effects during demolition and

construction are identified in respect of Noise & Vibration, Socio-economics and Landscape. Significant adverse effects due to Noise arise as a result of the construction of CTP Development Zones 1 & 2, but would not be realised continuously over the duration of the entire demolition and construction period – they would be temporary short- to medium-term impacts that would cease once the development is completed; and which can be managed. Such impacts and their means of management and mitigation are not unusual; and planning conditions are typically used to secure the operation of a range of measures to provide some control over the nature and extent of noise and vibration emissions, most notably with the use of Construction Environmental Management Plans (CEMPs). Suggestions for a range of possible mitigation measures in this respect are set out in ES Volume 9 (Noise & Vibration). Also not unusual as an impact of the demolition and construction phases of a development, temporary significant adverse impacts upon the character of the site are also identified, but can also be mitigated to an extent by CEMPs.

- 3.44 A significant adverse impact in terms of the changes to the built-form occupying the site is also identified, arising from the demolition of existing buildings and the erection of new ones, although it is concluded that the proposed new built form would be an improvement. In this respect it is noted that the Design Code document proposed to be determined at the outline stage is intended to ensure the quality and consistency of the design of new buildings and the spaces around them; and that this would be within the framework established by the Parameter Plans also proposed to be approved at the outline stage that would establish strategic screen and structural landscape planting. A further significant adverse effect of the demolition and construction phase of the development that is identified is the moderate loss of existing grassland within the application site as a landscape resource; however this is to be compensated by the new landscape planting.
- 3.45 Clearly, the demolition and construction phases of the proposed development would result in the interaction of likely significant temporary effects arising from noise & vibration, ground conditions and visual & landscape (built-form) changes : this is inevitable with proposed development activity and is therefore an unsurprising and expected conclusion to reach. Also unsurprisingly, significant temporary beneficial socio-economic effects are identified directly as a result of the employment generation (699 full-time equivalent jobs) arising from the demolition and construction of the proposed development; and also from the indirect economic boost arising from spending in the local economy.
- 3.46 In terms of the impacts of the proposed development once completed, no significant effects are identified in respect of Air Quality, Transport & Movement, Noise & Vibration, Climate Change, Socio-Economics, Ground Conditions and Visual Impact. However, significant effects are identified as likely in respect of Landscape and Ecology & Biodiversity. In terms of landscape impacts, this results from the replacement of existing built-form with a new built-form. As a result of the improved design quality and consistency to be introduced into the design of the development with the Design Code and Parameter Plans, and the introduction of screen and structural landscape planting, it is argued that, by the completion of the proposed development in Year 15, the development is expected to have a significant beneficial impact.
- 3.47 Similarly, with respect to Ecology & Biodiversity, the proposed development will secure via a s106 Agreement legal commitments for Biodiversity Net Gain the subject of a Habitat Management & Monitoring Plan (HMMP) to enhance habitats within the Ball Hill SINC targeting the improvement of lowland meadow habitats. Recreational use of the SINC by employees of the proposed development would also be limited and managed similar to those access measures adopted for many years to date in respect of the Eelmoor Marsh SSSI. In these ways it is argued that the proposals would have a significant beneficial impact upon the SINC.

3.48 Likely significant cumulative effects identified as arising from demolition and construction are the short-term impacts of non-weekday demolition and construction activity noise and vibration on residential receptors at Kempton Court, Brook Gardens and Hazel Avenue (south) were the proposals for increased volume of flights and greater weekend flying at Farnborough Airport as proposed by planning application ref.23/00794/REVPP to be permitted and implemented whilst works are also underway at CTP. However, it is noted that the principal noise effect would be generated by the proposed increased flying operations rather than the proposed CTP development. No likely significant cumulative effects are anticipated once the proposed development is complete and operational.

3.49 **Chapter 15** is the concluding chapter of the ES and is an Environmental Management, Mitigation and Monitoring Schedule in tabulated form that summarises the 'measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment' which have been incorporated into the proposed application submissions. These catalogue the various mitigation measures identified throughout the ES and are a logical conclusion to the document.

4.0 Relevant policies, guidance and legislation

Legislation

4.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) are the relevant legislation against which to assess this ES.

The Development Plan

4.2 The following policies in the Rushmoor Local Plan are relevant to this case:

- SS1 (Presumption in Favour of Sustainable Development)
- SS2 (Spatial Strategy)
- IN1 (Infrastructure & Community Facilities)
- IN2 (Transport)
- IN3 (Telecommunications)
- HE1 (Heritage)
- HE4 (Archaeology)
- DE1 (Design in the Built Environment)
- DE4 (Sustainable Water Use)
- DE10 (Pollution)
- PC1 (Economic Growth & Investment)
- PC2 (Strategic Employment Sites)
- PC5 (Cody Technology Park)
- PC8 (Skills, Training & Employment)
- NE1 (Thames Basin Heaths Special Protection Area)
- NE2 (Green Infrastructure)
- NE3 (Trees and Landscaping)
- NE4 (Biodiversity)
- NE5 (Countryside)
- NE6 (Managing Fluvial Flood Risk)
- NE7 (Areas at Risk of Surface Water Flooding)
- NE8 (Sustainable Drainage Systems).

Supplementary Planning Documents/Guidance (SPDs)

4.3 The following topic-based SPDs are relevant:

- Car and Cycle Standards SPD

National planning policy and guidance

4.4 National Planning Policy Framework (2024) (NPPF):

- Section 2 - Achieving sustainable development
- Section 4 – Decision-making
- Section 6 – Building a strong competitive economy
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 10 – Supporting high quality communications
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

Paragraph 43 of the NPPF (Section 4) advises that having the right information is crucial to good decision-making, particularly where formal assessments (such as EIA) are required.

4.5 Noise Policy Statement for England (NPSE).

4.6 The Planning Practice Guidance ('the PPG') has a chapter on the preparation and consideration of Environmental Impact Assessments. It also has other chapters which advise on the preparation of other technical studies which form part of this ES.

Emerging policy

4.7 None.

5.0 Consultations and representations

5.1 The Council has consulted local people and other internal and external consultees. This report only reviews the views of RBC internal consultees, the county and other statutory bodies to assess the technical information submitted with this ES.

6.0 Appraisal of the ES

6.1 In considering the ES, the Council's Development Management Committee needs to be satisfied with the ES on two points. These are:

- (a) whether NWS Planning (formerly Stantec) has submitted sufficient information and evidence with their ES and, if not, whether the council should serve a notification under Regulation 25 of the EIA Regs on the appellant seeking "further information"; and

- (b) the quality of information submitted and the main findings of the ES are sufficient to allow the Committee to proceed with determining the planning application.

(a) Whether sufficient information and evidence has been submitted

- 6.2 The ES broadly follows the EIA Regs and the Planning Practice Guidance in its content and scope. It describes the site and development proposal. It identifies and considers four alternatives to the scheme being progressed. It purports to show ways in which the appellant has mitigated the impacts of the proposal on the surrounding area. The ES is informed by a number of technical reports that align with the EIA scoping opinion. The non-technical summary contains the information required in Schedule 4 to the EIA Regs.
- 6.3 Using the findings of these technical reports, the ES purports to identify the likely significant effects of the proposal.
- 6.4 The ES concludes that the scheme will have some beneficial residual effects through site regeneration, economic development and the introduction of biodiversity net gain, but its adverse residual effects are limited to ecology and landscape/visual effects during the demolition/construction period; and potential air quality effects in the event that back-up generators are required for the proposed data centres once operational.
- 6.5 The ES remains relevant and appropriate to the development proposals. Overall, the ES has largely followed relevant professional practices in the preparation of the various technical reports that underpin it. It remains for officers agree with some of the findings or have other concerns in these respects which will be examined in the usual way in the main body of the Officer Report to Committee to which this supplemental report will be attached.

(b) Comments on the quality of the information submitted

- 6.6 Where there are potential concerns about the information submitted this is considered to arise as a result of the outline nature of the planning application proposals and serves to identify areas where additional information must be required by imposition of planning conditions. This approach is supported by the comments received from consultees in respect of the planning application.

7.0 Conclusions

- 7.1 It is considered that the submitted ES satisfactorily passes the two tests required by the relevant EIA legislation.
- 7.2 The ES does not raise any obvious matters having regard to the council's public sector equality duty, as required by section 149 of the Equality Act 2010 or to local finance considerations (as far as they are material material), as required by section 70(2) of the Town and Country Planning Act 1990 (as amended), as well as climate change and human rights legislation (including Article 8 and Article 1 of the First Protocol regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions). More details about the ES can be found on the council's Planning web-pages at www.rushmoor.gov.uk for the planning application, ref.25/00537/OUTPP.