

5 FEBRUARY 2019

KEY DECISION? N/A

ADOPTION OF THE RUSHMOOR LOCAL PLAN

SUMMARY AND RECOMMENDATIONS:

Approval is sought to recommend to Council the adoption of the Rushmoor Local Plan and associated Policies Map in line with the recommendations set out in the independent Planning Inspector's report, and to the consequent replacement of the Core Strategy and a number of saved former Rushmoor Local Plan Review Policies.

It is recommended that:

- i) Cabinet recommends to Council that, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, the new Local Plan, and accompanying changes to the Policies Map, as amended by the main modifications identified in the Inspector's Report dated 14 January 2019, be adopted;**
- ii) Cabinet recommends to Council that the Rushmoor Local Plan Review (2000) saved policies, and Core Strategy (2011) policies, as listed in Chapter 16 of the new Local Plan, be replaced by the new Local Plan policies upon its adoption;**
- iii) Cabinet recommends to Council that it delegates authority to the Planning and Economy portfolio holder in conjunction with the Head of Economy, Planning and Strategic Housing to agree any further minor changes to the new Local Plan and the Policies Map prior to publication.**

1. INTRODUCTION

- 1.1** This report summarises the recommendations set out in the report of the independent Planning Inspector following the Examination of the Local Plan, which relate to main modifications required for soundness, and seeks approval to recommend to Council the adoption of the Rushmoor Local Plan and associated Policies Map.
- 1.2** Whilst the adoption of the Local Plan is not an executive decision for Cabinet, clearly it is a key decision for the Council as it is very significant in terms of its effects on communities living or working in the whole Borough and for steering development into the future.

2. BACKGROUND

- 2.1 The Rushmoor Local Plan will guide the location, scale and type of future development in Rushmoor Borough up to 2032 and provides detailed development management policies to be used in determining planning applications. The Local Plan will replace the Core Strategy (adopted 2011) and saved policies from the Rushmoor Local Plan Review (adopted in 2000).
- 2.2 The Local Plan was submitted to the Secretary of State on 2 February 2018, together with copies of all representations received during the public consultation on the Plan (which took place between 9 June and 21 July 2017). An independent Planning Inspector was appointed to consider the representations, and all the supporting evidence, and to determine whether the Local Plan was 'sound'. The full definition of 'soundness' is set out in paragraph 182 of the 2012 National Planning Policy Framework (NPPF) and includes the requirement for the Plan to be positively prepared (meets local needs); justified (evidence-based); effective (deliverable) and consistent with national policy. Plans submitted before January 2019 have been examined against the 2012 version of the NPPF rather than the revised NPPF published in July 2018.
- 2.3 The Planning Inspector issued her final report on 14 January 2019. Having considered all the evidence before her, including that presented at the public hearings held on 9, 10, 16 and 18 May 2018, she has concluded that the Local Plan provides an appropriate basis for the planning of the Borough, subject to a series of main modifications. Copies of the Inspector's report and the main modifications required to make the Plan 'sound' are attached at Appendices A and B to this report.

3. DETAILS OF THE PROPOSAL

Main Modifications

- 3.1 The main modifications all concern matters that were discussed at the examination hearings and all were subject to a six-week public consultation period between 7 September and 19 October 2018. In addition to the main modifications, the Council consulted on a list of minor modifications, which did not go to the soundness of the Plan (e.g. factual corrections and typological errors), proposed modifications to the Policies Map, and a Sustainability Appraisal Addendum. The Inspector considered all the representations received during the consultation when reaching her conclusions, and two of the main modifications were amended to take account of comments made (*MM4 which updates public health data and MM71 which corrects the definition of secular as it applies in the Heritage at Risk Register*).
- 3.2 The main modifications can be summarised as follows:
- Ensuring the Spatial Strategy is positively prepared (*e.g. MM3 which explains the difference between 'Growth' and 'Step-Up' towns*);

- Ensuring that the Local Plan reflects up to date evidence for housing supply (e.g. MM9 which provides updated figures on capacity);
- Modifying employment policies so that they are effective (e.g. MM108 and MM109 which delete criteria already covered under other policies in the Plan);
- Amending the Town Centre policies so that they are positively prepared and consistent with national policy (e.g. MM17 and MM33 which add references to markets);
- Modifying housing and local needs policies so that they are effective and consistent with national policy (e.g. MM100 which removes a requirement for specialist housing proposals to show how they meet local need, since the need has already been established) ;
- Ensuring that the policies for the historic, built and natural environment are positively prepared (e.g. MM76 which addresses concerns expressed by Historic England);
- Modifying the policies for Farnborough Airport so that they are effective (e.g. MM47 which clarifies the position on monitoring); and
- Amending infrastructure and site allocations policies so that they reflect up to date evidence, and are consistent with national policy (e.g. MM14 which clarifies the Council's position on viability).

3.3 The recommendation of main modifications by an Inspector to make a Plan 'sound' is not unusual in a Local Plan examination and many of the proposed modifications have been put forward by the Council to deal with issues as they arose during the examination process.

Minor Modifications and Policies Map

3.4 The Policies Map is a graphical representation of the Council's planning policies. The Council is free to make further minor modifications to the Plan and to the Policies Map up to the point of publication. There are a number of further changes to the Policies Map, which arose during consideration of the representations. These will be incorporated into a new Policies Map, to provide a single graphical representation of the Local Plan Policies.

3.5 It is proposed that authority be delegated to the Planning and Economy portfolio holder in conjunction with the Head of Economy, Planning and Strategic Housing, to agree any minor changes to the Plan and the Policies Map prior to publication. This would only include the presentational style of the final version document, including a foreword, photographs and illustrations and any final factual, grammatical and/or typographical errors that have not previously been identified and which would not materially affect the content or meaning of the Plan.

3.6 A final draft version of the Local Plan, which incorporates all of the main modifications attached to the Inspector's report, and the minor modifications identified to date can be viewed on the Council's website at <https://www.rushmoor.gov.uk/localplanexamination>. Hard copies of the final draft Policies Map will be available to view at the meeting.

Replacement of Core Strategy and Rushmoor Local Plan Review Policies

- 3.7 The new Local Plan will form the definitive development plan against which all planning applications considered after its adoption will be assessed. Chapter 16 of the Local Plan identifies those saved Rushmoor Local Plan Review (2000) and Core Strategy (2011) policies that will be replaced by the new Local Plan once it is adopted. There have been no changes to this list during the Examination process.

Formal Adoption of Plan

- 3.8 The Local Plan needs to be formally adopted by Council at its meeting on 21st February 2019, and then, as soon as is reasonably practical, it should be made available on the Council's website and at the Council offices along with an Adoption Statement, the Sustainability Appraisal and details of where the documents can be inspected. The Council must also send copies of the Adoption Statement to interested parties and the Secretary of State.
- 3.9 The validity of the Local Plan and its adoption may be challenged in the High Court, within a six-week period from the date of adoption (no later than 4th April 2019), by way of section 113 of the Planning and Compulsory Purchase Act 2004. However, based on the objections which have been put forward to date, and which have all been considered as part of the examination, a legal challenge is not expected.

Five-Year Review

- 3.10 The 2018 NPPF (paragraph 33) requires that policies in local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from adoption, and should take into account changes to national policy and local circumstances, including changes to local housing need.

Alternative Option

- 3.11 The alternative option would be not to recommend the Local Plan for adoption by Council. However, this would conflict with the requirement in the 2018 National Planning Policy Framework (NPPF) for local planning authorities to have an up-to-date and adopted Local Plan. In the absence of such a Plan, the presumption in favour of sustainable development will apply and there is a risk of planning decisions being made on appeal against the wishes of the local community.

Consultation and Duty to Co-operate

- 3.12 Public consultation on the Local Plan has taken place at key stages throughout its development, since its initial conception as a Delivering Development DPD to sit alongside the Core Strategy, including formal six-

week public consultations at preferred approach stage in 2015 and pre-submission in 2017. This is set out in the Consultation Statement submitted with the Plan.

- 3.13 In addition, the Council has consulted a range of Duty to Co-operate bodies including neighbouring authorities, infrastructure providers and other statutory bodies, as set out in the Duty to Co-operate Statement submitted with the Plan.
- 3.14 The Inspector concluded in her report that the Duty to Co-operate has been met, with the Council engaging constructively, actively and on an on-going basis in the preparation of the Plan, and that consultation on the Plan and the main modifications was carried out in compliance with the Council's Statement of Community Involvement. The Inspector made particular mention of the steps taken by the Council to involve the Nepali community in the plan-making process.
- 3.15 As set out above, it is proposed that the Planning and Economy portfolio holder, in conjunction with the Head of Economy, Planning and Strategic Housing, be given delegated authority to agree any minor changes to the Local Plan and the Policies Map prior to publication.

4. IMPLICATIONS

Risks

- 4.1 There are not considered to be any risks associated with the implementation of the recommendations of this report. If the Plan is not adopted, the presumption in favour of sustainable development will apply, and there is a risk of planning decisions being made on appeal against the wishes of the local community.

Legal Implications

- 4.2 There are not considered to be any legal implications arising from the decision other than those already identified above.

Financial and Resource Implications

- 4.3 There are not considered to be any financial implications arising from the decision. The cost of the Examination has been included within budgetary provision.

Equalities Impact Implications

- 4.4 An Equality Impact Assessment was submitted with the Plan for Examination. The Inspector has had regard to this and to the Public Sector Equality Duty contained in the Equality Act 2010 in reaching her conclusions and has noted that the policies in the Local Plan will have a generally positive impact, in particular in relation to the protected

characteristics of older people, gypsies and travellers and those with disabilities.

5. CONCLUSIONS AND RECOMMENDATIONS

- 5.1 The Local Plan has been found 'sound' by an independent Planning Inspector, following an Examination which included four days of public hearings, subject to main modifications which have been consulted upon over a six week period. If the Plan is not adopted by Council, the presumption in favour of sustainable development will apply and there is a risk of planning decisions being made on appeal against the wishes of the local community.

BACKGROUND DOCUMENTS:

Report No PLN1701 considered by Cabinet on 4 April 2017, which approved the publication of the Draft Submission Local Plan for consultation.

The background documents that have informed the preparation of the new Local Plan can be viewed via www.rushmoor.gov.uk/newlocalplan

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Report to Rushmoor Borough Council

by Louise Gibbons MRTPI BA (Hons)

an Inspector appointed by the Secretary of State

Date: 14 January 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Rushmoor Local Plan

The Plan was submitted for examination on 2 February 2018

The examination hearings were held on 9-10 May and 16 and 18 May of 2018

File Ref: PINS/P1750/429/7

Abbreviations used in this report

ANG	Air Navigation Boundary
APPB	Airport Planning Policy Boundary
APF	Aviation Policy Framework
CAA	Civil Aviation Authority
CIL	Community Infrastructure Levy
DtC	Duty to Co-operate
FEA	Functional Economic Area
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LEP	Local Economic Partnership
LIES	Locally Important Employment Sites
LP	Local Plan
MHCLG	Ministry of Housing, Communities and Local Government
MM	Main Modification
NPPF	National Planning Policy Framework
NHTM	North Hampshire Transport Model
OAN	Objectively Assessed need
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PSZ	Public Safety Zone
SA	Sustainability Appraisal
SANG	Suitable Alternative Natural Green Space
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SEP	Strategic Economic Plan
SES	Strategic Employment Sites
SHELAA	Strategic Housing and Economic Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SuDS	Sustainable Drainage Systems
TBHSPA	Thames Basin Heaths Special Protection Area
UPC	Un-attributable Population Change
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Rushmoor Local Plan (LP) provides an appropriate basis for the planning of the Borough, provided that a number of main modifications (MMs) are made to it. Rushmoor Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared a schedule of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Ensuring the Spatial Strategy is positively prepared;
- Ensuring that the Local Plan reflects up to date evidence for housing supply;
- Modifying employment policies so that they are effective;
- Amending the Town Centre policies so that they are positively prepared and consistent with national policy;
- Modifying housing and local needs policies so that they are effective and consistent with national policy;
- Ensuring that the policies for the historic, built and natural environment are positively prepared;
- Modifying the policies for Farnborough Airport so that they are effective; and
- Amending infrastructure and site allocations policies so that they reflect up to date evidence and are consistent with national policy.

Introduction

1. This report contains my assessment of the Rushmoor Local Plan (LP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised National Planning Policy Framework was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Unless stated otherwise, references in this report are to the 2012 NPPF. Likewise where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Rushmoor Local Plan, submitted in February 2018 is the basis for my examination. It is the same document as was published for consultation in June 2017.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MMs schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted

policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Policies Map as set out in the Proposed Changes to the Policies Map.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. These further changes to the policies map were published for consultation alongside the MMs as Appendix 1a, 1b and 1c Policies Map Modifications.
7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Proposed Changes to the Policies Map and the further changes published alongside the MMs.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
9. The Council has been proactive in this respect. From 2014 the Council developed a framework for focussing on strategic cross boundary matters. A number of meetings were held between different authorities to discuss these matters both at officer level and through a Joint Members Liaison Group.
10. Key outcomes include an agreed Housing Market Area with Surrey Heath Borough Council and Hart District Council, the production of a joint Strategic Housing Market Assessment (SHMA) and Employment Land Review, and delivery of shared Strategic Alternative Natural Greenspace (SANG) to provide mitigation for the impact of housing on the Thames Basin Heaths Special Protection Area (TBHSPA).
11. Mechanisms for engagement are strong with joint consideration of key planning matters including the delivery of housing and employment within the Housing Market Area. A Statement of Common Ground (CD/01/08, Appendix 7) between the three HMA authorities sets out the aim of meeting housing needs within the HMA. The Statement of Common Ground contains commitments from the other authorities in terms of unmet need. The authorities are in agreement over the Functional Economic Area, and there are no outstanding objections from other neighbouring authorities in terms of the delivery of housing.
12. The Duty to Co-operate Statement (CD/01/08) demonstrates further co-operation on a range of matters such as the natural environment with involvement from Natural England and continuous engagement with adjoining authorities and other advisory members of the Thames Basin Heaths Special Protection Area Joint Strategic Partnership Board. Joint working with Hampshire and Surrey County Councils has taken place in relation to mitigation of potential transport impacts with additional

engagement around the development of the North Hampshire Transport Model (NHTM). There has been effective involvement in the Plan from Historic England, the Environment Agency, and infrastructure providers.

13. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Consultation

14. The Statement of Community Involvement (SCI) (CD/01/07) establishes minimum requirements for consultation. The Nepali community have a very strong connection with Rushmoor through the British Army, and many have settled in the area. The Council used a wide range of methods to consult with the Nepali community including British Forces Broadcasting, holding a meeting with the Greater Rushmoor Nepali Leader at the time the LP was being developed, and using Everest, which is a Nepali magazine with national coverage.
15. The Council's Consultation Statement (CD/01/06) includes a note of the meeting with the Nepali Leader, and the concerns discussed. The Consultation Statement indicates how the Council gave local organisations and individuals a chance to be involved and make representations on the LP. A number of other bodies representing ethnic groups in the area were also contacted. Overall I am satisfied that the Council took sufficient steps to involve the Nepali community in the LP process. Moreover that the SCI has been complied with as required by section 19(3) of the 2004 Act.

Assessment of Soundness

Background

16. Once adopted it is intended that the LP will replace the Core Strategy (2011) and the saved policies from the Rushmoor Local Plan Review (2000). Replacement of the individual saved Local Plan and Core Strategy Policies is set out in Section 16 of the LP.

Main Issues

17. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified nine main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the spatial strategy is the most appropriate having regard to all reasonable alternatives and the evidence base.

The Spatial Strategy

18. The Borough is small, generally urban and densely populated. It consists of the two main settlements of Aldershot and Farnborough which have built up areas that adjoin each other. The spatial strategy for Rushmoor set out in

Policy SS2 is mainly focused on the regeneration and redevelopment of existing sites within the towns of Aldershot and Farnborough. With the exception of the major development of Wellesley which is former military land, and some land at Blandford House and Malta Barracks, the majority of development will take place on existing town centre sites within the defined urban area. The Borough's ability to grow is very restricted by a number of factors including European and national nature designations such as the Thames Basin Heaths Special Protection Area (TBHSPA) some of which is within the Borough, areas at risk of significant flooding, and the Public Safety Zone for Farnborough Airport.

19. The Council has assessed a number of employment sites in considering whether sites could be allocated for residential development. These sites were assessed in respect of their role, function and contribution to the Borough's employment land supply. This has resulted in changes to some boundaries of existing employment sites and allocation of former employment land which would contribute about 800 homes to the supply. The release of additional employment land would have an effect on the supply of employment land particularly around Farnborough Airport and the loss of businesses elsewhere in the Borough. The options around existing employment land have been fully explored, and the approach to selecting sites for redevelopment or retaining in employment uses is justified. Other policies in the LP should ensure that economic growth will not be negatively affected.
20. In addition, the Council assessed a number of sites outside the defined urban areas. One of the sites has been allocated for housing. The other sites were identified as not being suitable for residential development either due to being isolated or difficult to access, land in active uses including sport and recreation and Ministry of Defence land amongst other things. SS2 identifies that new development will be directed to the urban areas, this is justified by the careful consideration of all potential sites for development, and the assessment of reasonable alternatives. The key role of development on previously developed land within the area was not made explicit within the plan, and this is rectified by **MM5**. **MM1** clarifies that the consideration of the LP is based on the 2012 NPPF.
21. Aldershot is identified as a 'Step Up Town' in the Enterprise M3 Local Economic Partnership (LEP) Strategic Economic Plan (SEP). This indicates Aldershot is an area facing significant challenges which require considerable investment and redevelopment in the town centre. Funding for schemes in the Town Centre is available to support the objectives of the LEP. Farnborough is a 'Growth Town' and is performing well, and it is seen by the LEP as fundamental to the economic growth of the area. To be effective the explanation of this in Section 3 should make clear the implications of the towns being identified within the two different categories, and this is set out in **MM3**.
22. The strategy and accompanying policies of the LP are designed to improve the vitality and viability of Aldershot overall, and it would complement the role of Farnborough. There is no detailed evidence to indicate that the effect of the policies for Farnborough would be to cause a worsening of the

position in Aldershot. The LP is positively prepared as it recognises the changing function of the two town centres, particularly in Aldershot.

23. The apportionment of residential development between Farnborough and Aldershot is realistic and reflects the findings of the Strategic Housing and Economic Land Availability Assessment (SHELAA) (CD/02/5a) that identifies sites that are deliverable and developable over the plan period. An increased range of facilities in both towns, development through a number of allocated sites, coupled with the delivery of regeneration schemes by the Council in Aldershot represents a balanced and sensible approach. The strategy is therefore justified. Monitoring will allow the Council to assess if any changes to the strategy are required, which would then be a matter for a review of the LP.
24. The Sustainability Appraisal (SA) 2017 (CD/01/04a) assesses three options for the spatial strategy of Rushmoor. The options included consideration of rolling forward expected yields on sites considered in 2015, which would have resulted in a shortfall against the OAN. Whilst this would have delivered some housing, it would not have delivered community and other benefits including infrastructure requirements. A second option included an assessment of delivering on additional de-allocated employment sites.
25. The selected option in the SA identifies an increase in capacity on urban sites, and the allocated site within the countryside. It is based on updated housing capacity information, and work undertaken in relation to the Functional Economic Area (FEA). It would support the increased level of residential development which is closely related to the town centres of Aldershot and Farnborough.

Thames Basin Heaths Special Protection Area (TBHSPA)

26. The Habitat Regulations Assessment (HRA) (CD/01/05) identifies elements of the Plan that have the potential to cause an adverse effect on areas designated for their special habitats. It assesses a number of SPAs and Special Areas of Conservation (SAC) both alone and in combination with other known plans or projects.
27. It follows the stages of HRA with evidence gathering, assessing likely significant effects, conservation objectives of each protected site, and then proposes mitigation for any adverse effects. Appropriate Assessment has been carried out. I am satisfied that the HRA adequately addresses the full range of potential impacts on the Plan, and that its findings have been taken into account.
28. The whole of the Borough is within 5 kilometres of the TBHSPA. The TBHSPA is a mix of heath, scrub and woodland which supports important bird species. Negative impacts of residential development on the TBHSPA include visitors and pets causing disturbance. A measure to mitigate the effect of development includes the provision of SANG. These are areas where visitors and dog walkers are encouraged to visit instead of the TBHSPA. When existing SANG capacity accessible to existing and future

residents of the Borough is set against the total identified capacity for homes there is still a need to provide SANG for approximately 2,910 homes.

29. Capacity of three existing SANG sites used by the Borough has been exhausted through permitted or committed residential development within the HMA. However, a memorandum of agreement with Hart District Council in 2017 sets out the principles that governs the support that HDC will give to Rushmoor to access to SANG capacity for approximately 1,500 dwellings. Although the memorandum is not legally binding, I am satisfied that with the history of joint working between the Councils in the HMA it is reasonable to assume that the SANG in Hart would be available to Rushmoor residents. This leaves a remaining requirement for approximately 1,410 dwellings.
30. Policy SP10 of the LP sets out that a SANG would be provided as part of the site allocation at Blandford House and Malta Barracks. The SANG has full planning permission. Some of this area will be used by residents of the development although there is spare capacity for approximately 500 homes. **MM58** clarifies that the provision of the SANG is required to mitigate the impact of the development specifically on the TBHSPA.
31. In addition, the Council also took the formal decision to close Southwood Golf Course within the Borough, and use it as an additional SANG site. This will be available sometime in mid-2019 and is estimated to be capable of providing capacity for around 2,500 homes.
32. The east part of the golf course has a public right of way, and is generally more accessible to the public than the western portion. The capacity of the site will need to take account of people who already use the east part of the site for activities associated with a SANG such as dog walking and horse riding. The changes needed to make the site useable as a SANG would be limited. Natural England considers the site is suitable and I agree with this position.
33. The decision to use the site as a SANG was undertaken outside of this examination, and the work to change the site into a SANG has already begun. Whilst the opportunity to play golf here would be lost the site would still provide recreational benefits so that the negative impacts would be somewhat limited. Although the site is not allocated within the LP it is within the control and ownership of the Council, and I am satisfied this will be sufficient to ensure the site will be made available.
34. Natural England is satisfied that an adequate amount of SANG has been identified to support the delivery of housing within the Borough. In order to ensure that the links between the provision of housing and delivery of SANG are justified and effective, **MM11** and a consequential change through **MM12** are necessary. Policy NE1 also sets out that evidence based alternative mitigation strategies may be appropriate if agreed with Natural England.
35. I conclude that sufficient and suitable SANG would be delivered in a timely fashion such that it would not prevent housing development from coming

forward within the area, and the spatial strategy would be effective in this regard.

Overall conclusion on the Spatial Strategy

36. Overall the SA has sufficiently evaluated the reasonable alternatives and is suitably comprehensive, satisfactory and legally compliant. Subject to the recommended MMs, the spatial strategy is the most appropriate having regard to all reasonable alternatives and the evidence base.

Issue 2 – Is the housing requirement justified and deliverable and has it been calculated in accordance with national policy and guidance, and whether the Council will be able to demonstrate a five year supply of housing land on adoption of the Plan

Objectively Assessed Housing Need (OAN)

Demographic starting point

37. The demographic starting point identified in the SHMA is for 785 dwellings a year informed by the 2012 population projections and the 2012 household projections with the starting point for Rushmoor being 280 dwellings per annum. A review of updated data including new household projections for 2014 was published in 2017 after the SHMA was completed (CD/02/01c). This tested a number of alternative scenarios including a partial return to the trend of household formation rates, whilst taking into account the most recent projections.
38. Un-attributable Population Change (UPC) is an adjustment made by the Office for National Statistics (ONS) for discrepancies between census data and annual monitoring data. Other sources such as the patient register indicate that the figures for Rushmoor could potentially be higher. However, the SHMA also includes some sensitivity testing around UPC with the figure for Rushmoor similar to the demographic starting point. There was no detailed evidence to suggest that the patient register as it relates to Rushmoor is an accurate source of data, and it does not have the status of other official population statistics. Therefore this would not be a practical alternative to the demographic starting point. The SHMA approach to UPC is reasonable with regards to Rushmoor, and population growth in the Borough has not been under-estimated.
39. The SHMA acknowledges that to some extent there has been a suppression of household formation rates in the area but that this is a delayed element rather than a permanent suppression of formation rates in the longer term. In terms of Rushmoor, the figures within the SHMA review are either below or within 10 dwellings of the demographic starting point. The review points out a number of concerns in respect of returning in full to household formation in 2008. The SHMA also acknowledges that there may be an effect in terms of the TBHSPA limiting some population growth, although there is no detailed evidence to suggest the scale of impact or what particular impact there would be on Rushmoor's demographic starting point. There is also no evidence that the example of another authority where a

significant adjustment has been made for household formation rates is comparable to the situation for this Plan.

Market signals

40. The SHMA considers a range of market signals including house prices, rents, sales, overcrowding, homelessness and affordability. The affordability ratios for Rushmoor as set out in the SHMA comparing median house prices to median earnings indicate that house prices are seven times workplace earnings. The SHMA recommends an affordability uplift of 15% over and above the demographic starting point for the HMA; this is based on the need to incorporate concealed households. Other information suggests that the situation within the Borough is broadly equivalent to South East England as a whole. A number of Inspectors have selected figures that provide for an uplift based on affordability indicators generating uplifts of between 20 and 30% in the South East. However, whilst the uplift set out in the SHMA is below some alternative figures elsewhere, this would still have a significant positive impact on affordability within the Borough.

Housing requirements and employment growth

41. Original forecasts for jobs growth within the HMA varied significantly and this highlights the uncertainty associated with long term employment forecasts. In terms of employment growth, the SHMA nevertheless adopts a mid-point in the range of possible job scenarios with 1,200 jobs per annum growth for the HMA. This takes into account the economic growth potential within the area and an expectation of some increase in household formation rates to ensure that there would be an adequate resident labour force. The chosen scenario reasonably takes into account both historic trends and the different forecasts. The scenario of 1,200 jobs per annum would equate to the need to provide between 1,195 and 1,254 extra homes per annum to deliver the associated labour force requirements.
42. The SHMA also addresses the potential effect of London migration within the HMA on the basis of past trends. Modelling in the SHMA incorporates a level of net in-migration including from London. The overall net in-migration over and above the 2012 projections is driven by the forecast growth in employment. No further uplift is required given that these factors have already been taken into account in order to maintain the balance of net commuting.
43. There is now evidence that jobs growth within the overall HMA will be lower than forecast (CD/02/01d). There was a stall in employment during 2015 and 2016 although which was mainly due to a loss of jobs in Surrey Heath, with a smaller proportion in Hart District. However, there was no corresponding fall in employment in Rushmoor. There is also no evidence that this would have a significant effect on the housing need in Rushmoor. The LP nevertheless recognises that any significant change to the economic context may warrant an early review of the plan or specific policies.

Affordable Housing Need

44. The SHMA follows the approach for affordable housing need set out in the 2012 PPG. In addition, further work was undertaken on the need and demand for subsidised home ownership and intermediate housing. The HMA has a need for 970 affordable homes, with Rushmoor's need at 380 homes per annum. Whilst the Core Strategy (RBC/002a) included a requirement to provide 35% of dwellings as affordable, the LP proposes 30% on sites of 11 or more, and within the town centres the percentage is set at 20%. I acknowledge that the need for affordable homes is higher in Rushmoor than the other authorities in the HMA. However, factors such as the larger stock of affordable homes and a greater rented sector are partly responsible for this.
45. The Economic Viability Study (CD/02/04a) demonstrates that the figures in the LP are realistic and will not affect the deliverability of affordable housing overall within the Borough. The SHMA provides a reasonable evidential basis for the assessment of affordable housing needs in Rushmoor.

The OAN for the Borough

46. The SHMA has considered a range of housing market signals, and under the 2012 Planning Practice Guidance (PPG) there is no prescription on what level of uplift should be applied. The OAN for the overall HMA set out in the SHMA is 1,200 homes split between the three authorities. Rushmoor's OAN figure is 436 dwellings per annum which equates to a total of 7,850 homes over the LP period from 2014 to 2032. The OAN takes into account affordability, economic growth and London migration, and this represents a significant increase for both the HMA and Rushmoor in particular over and above the demographic starting point. Whilst some components of the demographic starting point and the OAN are challenged for Rushmoor, they are based on a sensible set of assumptions which have been suitably sensitivity tested including where updated data has been produced.
47. Hart District Council and Surrey Heath Borough Council are at different stages in the plan making process. It is understood that there may be a shortfall of housing supply in the Surrey Heath area. The Statement of Common Ground refers to Surrey Heath assessing opportunities to reduce any shortfall. Any shortfall in Surrey Heath's ability to meet its OAN has yet to be examined so that Rushmoor is not in a position to respond to this possibility.
48. The Council has nevertheless confirmed with the authorities within the HMA that it can meet its portion of OAN of 436 homes per annum with a degree of flexibility. The three Councils within the HMA are in agreement that Rushmoor is meeting its share of the OAN for the HMA and there is no known unmet need. The Council has demonstrated a positive and proactive approach to delivering growth and maximising delivery in Rushmoor as far as is possible.

Overall conclusion on housing need

49. I am satisfied that the approach within the SHMA to the demographic starting point, particularly as it relates to Rushmoor, is appropriate. The approach to OAN taken in the overall SHMA area through considering economic growth and affordable housing provision is sensible and recognises the need to uplift in response to market signals. The policies in the LP would be unlikely to meet the need for affordable housing in full. However, increasing the overall housing requirement to reflect this would be unrealistic in terms of delivery especially given the existing housing targets. The housing need figure is required to meet economic needs and aspirations of growth within the Borough, reflecting its position within the FEA, the Enterprise M3 area, and the HMA. It will help to significantly increase affordability in an area which exhibits higher levels of affordable housing need within the HMA.
50. The expectation in the NPPF is that objectively assessed need should be met in full. The housing requirement should therefore reflect the OAN. As such, it is justified, and has been calculated in accordance with national policy and guidance.

Five Year Supply of Housing Land

51. The housing requirement set out in the LP for Rushmoor is 7,850 homes over the plan period. A theoretical capacity of around 8,900 homes is identified. The overall numbers of new dwellings are set out in Policy SS2 of the LP. The policy refers to providing 'at least' 7,850 of homes over the plan period to 2032, and is consistent with national policy in terms of seeking to meet housing needs.
52. Section 6 of the LP provides further details on the allocation and delivery of specific sites. In order to reflect the latest position on site capacity contained within the SHELAA (CD/02/02a), **MM8**, **MM9** and **MM10** are needed to amend the information in Section 6 of the LP (Meeting Housing Needs). These incorporate potential capacity changes, changes to sites with planning permission, and the numbers of homes built since 2014, and are required for effectiveness.
53. The figures have been updated to alter the windfall allowance from 450 to 420 homes over the plan period. The windfall allowance is set out in the SHELAA. Sites above 5 dwellings or more have been identified. Therefore, the allowance only considers sites smaller than those with potential for 5 dwellings. The estimation of windfall sites is based on the delivery of sites of under 5 homes between 2008 and 2017 amounting to 10% of homes delivered. The latest monitoring information from 2017 shows a figure of 79 homes which indicates that delivery on these sites should continue to provide a reliable source of supply. The proposed windfall allowance equates to 30 dwellings per year, with the overall amount excluding sites which have recent planning permission. There is compelling evidence to include a windfall allowance in the 5 year supply consistent with the approach set out in paragraph 48 of the NPPF.

54. **MM9** also includes the changes to the capacity of individual sites. Sites have also been removed from the calculation where there are doubts about delivery within the plan period. The majority of homes expected to come forward are on allocated sites. The housing trajectory contained in Section 15 of the LP as the Housing Trajectory and Graph should be amended through **MM131** and **MM132** to reflect the latest position on housing delivery.
55. With the MMs, the LP demonstrates how the identified capacity of 8,900 homes can be delivered across the plan period. The theoretical capacity provides a significant buffer to accommodate potentially slow delivery at a single large site, and for the longer term town centre regeneration sites. The theoretical capacity is therefore a robust approach in the context of Rushmoor's specific characteristics.
56. There is no history of persistent under-delivery within the Borough set against previous plan targets. These were 310 homes per annum in the Rushmoor Local Plan Review and 374 homes per annum in the Core Strategy. With respect to the Local Plan, the requirement for 436 homes per annum has not been met since 2014 which is the start of the LP period. However, given this is over a short period it is not sufficient to represent a persistent state. The provision of 436 homes per annum represents a significant step change in the provision of housing, particularly against the figures in the Core Strategy. The application of a 5% buffer is appropriate in the context of Rushmoor and would be consistent with national policy.
57. In accordance with the PPG the aim is to deal with any undersupply in the first five years where possible, and work with other authorities under the Duty to Co-operate when this cannot be done. The undersupply in dwellings since 2014 equates to a total of 472 homes. In this case, the Council is proposing to deal with the undersupply by means of the Liverpool method which means spreading the undersupply over the whole plan period, resulting in a total of 468 homes per annum over the 15 year period. A significant proportion of the homes within the Borough will come forward on a single site which will deliver 3,850 homes over the plan period. A number of allocations also include phases which will come forward in the medium or long term; this is due to the majority being redevelopment or regeneration sites. There is no evidence that adjoining authorities are in a position to absorb further housing in the short-term. In these circumstances the use of the Liverpool method is appropriate and justified.
58. The five year housing requirement incorporates the undersupply figure. The Council's assumptions on demonstrating a five year supply of housing land are robust and there is a healthy 7.9 years supply.
59. There is no Housing Implementation Strategy to accompany the LP. Therefore **MM11** is required to refer to the production of a Housing Implementation Strategy with detail on what will be monitored and managed, and how actions would be implemented to secure delivery of housing. Monitoring will also ensure that any additional sites that become available will be incorporated into the supply of housing land.

Overall conclusion on housing supply

60. Taking into account the above including the recommended MMs, provision is likely to meet the identified need for housing over the plan period and the Council would be able to demonstrate a five year housing land supply upon adoption of the LP.

Issue 3 – Will the Plan ensure that the aspirations for economic growth and jobs will be delivered? Are the employment policies justified, deliverable and consistent with national policy?

61. The Employment Land Review Update 2016 (CD/02/03a) concludes that across the FEA the balance between forecasts for employment requirements up to 2023, and the overall supply of office and industrial space, is tight. In terms of Rushmoor, and its role within the Enterprise M3 area, there is justification for identifying sites which will ensure the delivery of jobs and growth within the area. A number of the sites are remaining parcels of land on previously allocated sites or regeneration schemes that have yet to commence. The approach to employment sites will provide a framework to protect and enhance a realistic portfolio of sites in the Borough. The sites will contribute particularly to the number of B-use class jobs within the FEA.
62. The Council has introduced Strategic Employment Sites (SES) that fulfil a strategic function across the FEA. The sites either reflect the LEP's priorities or support core sectors for the wider area economy. The Council are supporting this through the implementation of an Article 4 Direction. **MM128** is necessary to provide further explanation on this in the interests of effectiveness. Policy PC1 supports the strategy for economic growth and investment in the area. It is in line with the spatial strategy and is positively prepared.
63. Policy PC2 relates to the designation of the SES. Its main focus is the protection of these sites that are to be safeguarded against loss of B (Business) use classes. However, it allows a measure of flexibility for small scale non-B class uses to complement the existing uses on the site. The policy is justified and would provide significant support for the employment growth aspirations of the Borough and for the wider FEA.
64. Locally Important Employment Sites (LIES) serve the local economy of Rushmoor. Policy PC3 relates to the LIES and sets out that non-B use classes will be permitted subject to a number of criteria. There is a much more flexible approach to LIES than the strategic sites. The Policy is consistent with paragraph 22 of the NPPF. It would assist in an appropriate balance between economic growth and allowing other uses to assist in retaining the vitality and viability in each LIES. However, in order for the Policy to be effective **MM106** provides clarity that criterion c) must be met, but that d) and e) are alternatives. The Policy is sound subject to this main modification.

Employment site allocations

65. Policy PC4 relates to the Farnborough Business Park which is the Borough's flagship office site. The Policy is positive towards proposals for office development. However, the site is also affected by a number of heritage assets including Listed Buildings associated with the history of Farnborough Airport. An amendment to Policy PC4 is necessary to reflect the significance of the wind tunnels on the site through **MM107**.
66. Cody Technology Park is situated in the countryside on land between Fleet and Farnborough. In order for the site to be considered in a consistent manner as other development proposals within the countryside, the criterion in Policy PC5 relating to the gap between the two settlements should be removed through **MM108**. Criterion c) of Policy NE5 of the LP already provides guidance on this matter.
67. Policy PC7 relates to Hawley Lane South as a new employment site. The land is within the ownership of the Council. The access to the site would be widened to accommodate the new uses, and new accommodation would be found for the very small number of uses currently operating from the site. Initial preparatory work has been undertaken. The site is close to other employment areas, and would be deliverable. The allocation is justified, and is sound.
68. Policy PC8 supports the Council's objectives of improving training and skills within the area. However, criterion a) relating to improvements to educational establishments overlaps with Policy IN1 relating to infrastructure, and is therefore not necessary. It is removed through **MM109**.

Overall conclusion on employment development

69. Subject to the MM, the policies in the Plan in relation to the employment development needs of the Borough are deliverable, justified and will be effective in supporting economic growth aspirations of the LP.

Issue 4 – Are the policies for Aldershot and Farnborough Town Centres and North Camp District Centre justified, deliverable and consistent with national policy

Aldershot Town Centre

70. The focus for Aldershot Town Centre is to allocate key sites for redevelopment or conversion. Policy SP1 sets out the principles for the Town Centre. Modifications to Policy SP1 are required to ensure that it will be effective in prioritising the Galleries and Union Street East, and in identifying key activities such as enhancing Aldershot's market and emphasising environmental improvements through **MM17**. **MM16** is a consequential change in terms of environmental schemes, and also confirms the importance of The Galleries (SP1.4) and Union Street East (SP1.5) allocations as key sites for the Town Centre.

Farnborough Town Centre

71. Policy SP2 sets out the principles for the Town Centre including that it should be a focus for a mix of uses that builds on the investment that has already been made in Farnborough. The strategy incorporates the evening economy, housing and transport improvements among other things, and is justified in the context of the town's role as a 'Growth Town'. However, to ensure that the policy will be effective in dealing with the wide range of town centre issues, and to be consistent with national policy, Policy SP2 should be amended through **MM33** which adds a criterion relating to the retention and enhancement of Farnborough's market.

North Camp District Centre

72. North Camp District Centre plays an important role in providing for the needs of residents within the southern part of the Borough. The area includes some specialist shops although it has a limited range of comparison goods. The strategy is focused on maintaining or enhancing the vitality and viability of the District Centre, and supporting retention of existing uses. Policy SP3 is sound as it acknowledges the particular characteristics of this Centre.

Primary and Secondary Shopping Frontages

73. Policies SP1.1, SP1.2, SP2.1, SP2.2, SP3.1 and SP3.2 relate to the primary and secondary shopping frontages in Aldershot, Farnborough and North Camp respectively. In order to avoid duplication with Policy DE1, the requirements and accompanying explanation relating to appearance and amenity of nearby residential properties are removed in the policies through **MM21, MM23, MM36, MM38 and MM42**. Necessary consequential changes to the supporting text are set out in **MM20, MM22, MM35, MM37, MM41, and MM44**.
74. The Council acknowledges that the retail environment of Aldershot is particularly challenging. In order to reflect this and to introduce further flexibility in defining the percentages of non-A1 (retail) uses classes within the Wellington Centre, Union Street East and Wellington Street, **MM21** is required to Policy SP1.1 which provides a consistent 30% threshold for A1 uses and provides further explanation on circumstances where viability will be taken into account. **MM18** provides necessary clarification on marketing requirements and this is needed for the policy to be justified. In general terms, the application of 12 months marketing is reasonable as this can start before a property becomes vacant, and is acceptable for all LP policies where marketing is a consideration. **MM19** is necessary to add a new explanatory paragraph that provides confirmation of how the policy would apply in the short term to Wellington Street as the A1 threshold is currently breached.
75. Policies SP2.1 and SP2.2 relate to Farnborough's primary and secondary shopping frontages. In order for the LP to be consistent with national policy, and with the policies for Aldershot Town Centre, it is necessary for the policies to refer to viability as well as vitality. This is reflected in **MM36**

and **MM38**. **MM34** is necessary for effectiveness and to ensure that the correct shopping frontage is identified.

76. Policy SP3.2 deals with the secondary shopping frontage in North Camp District Centre. **MM45** is needed to incorporate viability as a consideration in planning applications to be consistent within national policy. In order to reflect the limited capacity for additional retail floorspace and the role of the District Centre, **MM45** also removes the threshold of 50% for non-A1 (retail) units, with a consequential change to the supporting justification through **MM43**.

Overall conclusions on retail

77. The LP approach to its Town and District Centres is based on a realistic assessment of what can be delivered in terms of the over-arching principles for each centre, and has an appropriately flexible approach to primary and secondary shopping frontages where necessary. Subject to the MM the policies are consistent with national policy.

Issue 5 – Whether the Plan will be effective in delivering the appropriate types of housing to meet the needs of the area

Need for specialist accommodation

78. Policy LN1 seeks to deliver a balanced mix of housing within the Borough. Amongst other things it sets targets for percentage of dwellings to be built to meet the requirement of the Building Regulations M4(2) and for self-build and/or custom built houses.
79. In respect of criterion e) and accessible and adaptable standards, this sets out that a target of 15% of market dwellings should be built to meet the requirements of Building Regulations M4(2). In accordance with the Planning Practice Guidance, the assessment of need includes sources of data which demonstrate there will be a significant increase in the numbers of people with mobility problems in the Borough by 2031, 108% up from 2011. The SHMA also sets out that the number of people in the HMA with a long term health problem or disability will increase by 45% up to 2023. The evidence supports the need and is sufficient to justify the inclusion of a criterion in this respect. The Economic Viability Study (CD/02/04a) tests this and considers the average cost per dwelling. The study addresses the average over access costs for flats and houses, and concludes that there is only a minor impact on viability. As the requirement is limited to 15% of dwellings to meet the standard, this would not have an impact on overall scheme viability. The criterion also incorporates a requirement for the site to be suitable for this, and additionally criterion d) requires consideration of site specific viability. On this basis criterion e) is justified.
80. In terms of criterion f) of the policy relating to self-build, this sets out a target percentage. The Economic Viability Study indicates that the provision of these types of plots on larger sites would be neutral in terms of viability. The Council's register of self-build homes has a number of entries that require planning permission before 2021. Self-build plots are already permitted as part of the Blandford House/Malta Barracks allocation, subject

to the completion of a legal agreement. Based on local evidence, the target of 5% is realistic and achievable. The explanatory text sets out that 12 months would be the minimum time period for plots to be developed. This introduces flexibility to the policy.

81. **MM96** is necessary within the Policy to set out that the SHMA or any subsequent update should be used in considering local need, this is needed to ensure effectiveness of the policy over the plan period. **MM95** is required to the explanation of Policy LN1 to ensure it refers to a target and not a minimum in order to ensure consistency with the Policy.
82. Policy LN2 deals with affordable housing provision. This requires a minimum of affordable homes to be provided on sites above 11 homes. The Economic Viability Study indicates that the application of the different percentages is justified. In any event, the policy recognises that site viability will be considered on all sites in the first instance and it is consistent with national policy in this regard. The separate threshold for the Town Centres set at 20% is realistic based on viability evidence but it will also make a reasonable contribution to affordable housing. In order for the policy to be justified, additional wording relating to site specific circumstances is added to the explanation through **MM98**. The consideration of Vacant Building Credit has been added to the explanatory text through **MM97** to ensure consistency with the PPG.
83. Policy LN4 relates to the provision of specialist and supported accommodation. The evidence of the SHMA suggested a requirement for specialist accommodation to meet the needs of the older population. In terms of reasonableness, Policy LN4 is unsound as it was based on a requirement to demonstrate a local need. However, this need has already been established. Accordingly, **MM100** is necessary for the policy to be sound by removing this requirement.
84. The SHMA acknowledges that overcrowding in Nepali households is common. There is no detailed evidence to suggest that the use of other sources of data from the Nepali Centre or the National Health Service would be more accurate than the official statistics or that it would result in the need for separate housing requirements. Redundancies in service personnel may result in a proportion of people applying for affordable housing. Nevertheless, the Council is seeking to provide a mix of types of homes for its communities. **MM94** is necessary to explain how the Council's Housing and Homeless Strategy helps to provide other forms of access to housing for different groups including Armed Forces leavers and the Nepali population. Subject to the recommended MMs the policies of the LP including LN1, LN2 and LN4 are sufficient to provide housing for these groups without the need for specific policies.

Other local needs policies

85. There are a number of smaller neighbourhood facilities which provide a mix of uses for day to day needs of local residents that is dealt within Policy LN6. In order for the policy to be consistent in its approach to A1 (retail) uses and viability in the LP, **MM102** is required to refer to marketing and

viability. This requirement is not overly onerous in respect of the start of the 12 month marketing period, and is consistent with other policies in the plan. **MM101** also provides further explanation on this, and incorporates amendments as a result of the changes to Policy DE1.

86. The LP retail policies are supported by Policy LN7 that deals with retail impact assessments. This sets a threshold for requiring an assessment that is lower than that within the NPPF. The policy is based on evidence in the Rushmoor Retail, Leisure and Town Centres Study, 2015 (CD/05/01 and CD/05/02). The study is based on reasonable assumptions, and is consistent with the approach in the PPG for establishing local circumstances. On this basis, the policy is justified in its approach towards the thresholds in the Town and District Centres.
87. Policy LN8 deals with development that may result in the loss of a public house. The requirements within the policy relating to marketing and viability are more onerous than other policies in the LP where viability is a consideration. The policy should therefore be amended through **MM105** to remove the detailed criteria and replaced with wording relating to effective marketing for A4 use. Necessary consequential changes to the explanation are set out in **MM104**. In order for the policy to be effective **MM103** removes a paragraph in relation to permitted development as this is out of date.

Gypsy and Travellers

88. The LP is accompanied by a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (CD/02/07) with the requirement for a single pitch identified for the period up to 2017 although the need arose from a family that identified a requirement for a pitch in a rural area and included Guildford within the requirement. There are no existing sites for Gypsy and Travellers within the Borough in terms of permanent accommodation.
89. The Assessment also identified the need for a temporary or transit site for no more than five pitches but the Plan does not make provision for this. Other permanent and transit sites are located within Guildford and Waverley close to the Borough boundary, and arrangements for joint working on transit sites exist with Basingstoke and Deane and Hart councils. The Accommodation Assessment also indicates that transit needs would be met more practically as part of the wider area where other sites do exist.
90. Although the document dates from 2012, other more recent evidence from the Council suggests that the position on permanent and transit sites has not changed. Some short term unauthorised encampments have been recorded but these vary each year with the numbers generally low. No sites have been put forward in the Council's call for sites, and no planning applications have been received for pitches since 2012. Caravan counts going back to 2015 have not recorded any in Rushmoor. It is an agreed position with adjoining authorities that there are no outstanding needs from elsewhere in relation to Gypsy and Travellers. There is therefore no current compelling evidence of need for a transit site or pitch.

91. I therefore consider that Rushmoor is a Borough where a criteria based policy would be justified and consistent with the Planning Policy for Traveller Sites document (2015). Policy LN3 is unsound as it is based on demonstrating a local need. In terms of reasonableness, the policy should not be overly onerous. Accordingly, **MM99** is necessary for the policy to be sound as it would make it more positive.

Travelling Showpeople

92. The Borough does have an established Travelling Showpeople population with existing yards. Updated evidence in 2015 supported a need to provide additional space for Travelling Showpeople. The LP therefore makes provision for this. Two sites are allocated comprising of an extension to an existing site in a car park in North Camp in Policy LN3.1, and a new site at Hawley Lane South in Policy LN3.2. Both of these sites are in the Council's ownership, and are suitable and deliverable within the Plan period. Subject to the recommended MMs the policies for Gypsy and Travellers and Travelling Showpeople are reasonable and justified.

Overall conclusions on housing needs

93. Subject to the recommended MMs the policies in the Plan will be effective in delivering the appropriate type of housing to meet the needs of the area.

Issue 6 – Whether the Plan makes appropriate provision for the built, historic and natural environment

Historic environment

94. The Council acknowledges the importance of the historic environment and there are a number of policies to support this. However, neither the Vision nor Strategic Objectives of the Plan refer to the historic environment. **MM5** to the LP vision is needed to demonstrate the role that the Borough's historic and environmental assets play in promoting local identity. **MM7** updates Strategic Objective I to include 'historic' in the wording to ensure this is a fundamental objective of the Plan.
95. Policy HE1 sets out the overall approach to the historic environment. **MM76** is required to the Policy so that it is consistent with national policy, and in particular how the assessment of proposals would be undertaken and the balance of heritage assets and public benefits would be carried out. In order for the policy to be effective **MM76** also provides details on how a decision maker should react to specific proposals dealing with Listed Buildings and non-designated heritage assets. In order for the policy to be justified and effective, further explanation and the latest position on Listed Buildings and Buildings of Local Importance should be set out in the text through **MM69, MM70, MM71, MM72, MM73, MM74** and **MM75**. **MM124** updates the monitoring table in respect of these changes. **MM129** and **MM130** assist with definitions and are necessary for effectiveness. **MM71** is updated to provide for the correct definition of secular.
96. Policy HE2 deals with demolition or partial demolition of a heritage asset. The balance of this loss with public benefits was not included within the

Policy. **MM78** to Policy HE2 and **MM77** are required so that the policy is consistent with national policy and justified.

97. Policy HE3 relates to Conservation Areas, and the policy as worded is justified. However, the explanation needs to provide clarification as to the role of character appraisals and management plans in **MM79**. This is necessary to support the Council's positive and proactive approach to the historic environment.
98. To ensure consistency with national policy, Policy HE4 dealing with archaeology needs modifications. **MM81** incorporates references to scheduled monuments and field evaluation within the policy, and to incorporate the public benefits test. **MM80** is a consequential change to the accompanying text to provide clarity over what is meant by field evaluation.

Climate change

99. The SA objectives refer to improving efficiency, reducing waste and greenhouse and air pollution with ensuring that air quality improves. They also refer to managing and mitigating impacts of climate change. One of the strategic objectives of the Plan is to reduce the area's contribution to the causes of climate change and to minimise its impacts on the Borough. A number of policies seek to improve sustainability of new built development as well as mitigating the impacts of climate change. Of particular relevance in this respect are Policy SP4 as well as IN1, IN2, DE1, DE4, DE10, NE2, NE6 and NE7. However, **MM82** is necessary in the explanation to justify the Council's overall approach towards climate change and explains how criterion b) of Policy DE1 relating to the use of renewable energy will be considered. The Plan as a whole gives suitable importance to this issue.

Design

100. As submitted Policy DE1¹ would not be effective in seeking to secure a good standard of amenity for all existing and future occupants of land and buildings. The policy should also be sufficiently flexible towards all types of development, where circumstances may mean that not all of the criteria in DE1 would necessarily apply. **MM83** addresses this and also how a decision maker should react to proposals which could affect proposed, existing and adjacent users, without the need for repetition of these aims within the shopping frontage policies.
101. Policy DE2 deals with residential internal space standards. Viability evidence indicates that space standards can be accommodated from a viability viewpoint. Local evidence on standards suggests that developments are meeting this voluntarily although this could not always be guaranteed. The policy is therefore reasonable in its approach and consistent with national policy in this regard. In order for the policy to be justified **MM84** clarifies

¹ Policy D1 corrected to Policy DE1.

that the policy applies to proposals for C3 (residential) uses. This will allow flexibility for circumstances where the proposed use class is not C3.

102. Policy DE3 concerning residential amenity space standards is justified based on the evidence subject to **MM85** that introduces flexibility to the requirement to provide equivalent internal living space where it is not possible to provide external space. Policy DE4 relates to sustainable water use. In order for the policy to be effective **MM86** is necessary to ensure that any future standards can be applied.
103. In order to avoid repetition with Policy DE1 and to be effective, the bullets in Policy DE5 have been removed in **MM87**. This MM will allow the policy to be effective as it now simply relates to any proposals that would involve the net loss of residential dwellings rather than specifying other potential forms of development that are already covered within other policies of the LP.
104. Policy DE6 deals with new provision of open space, sport and recreation and also the loss of such facilities. **MM91** is necessary to ensure that the policy is consistent with paragraph 74 of the NPPF, referring to the need for an assessment to demonstrate open space is surplus to requirements. **MM89** is a consequential change, and clarifies the baseline evidence for supporting any assessment. The explanation is also amended by **MM88** to confirm that allotments are open space and how this links to the Policies Map. The classification of allotments as such is justified. **MM90** is needed to update play space age ranges and correct the number of sites required per 1,000 head of population.
105. Policy DE8 relates to indoor sport and recreation facilities. For the policy to be effective and justified when considering the potential loss of facilities **MM93** is required to enable the decision maker to assess these types of proposals. **MM92** is a necessary consequential change which sets out the Council's expectations in terms of evidence of viability and need.
106. Policy DE10 deals with all forms of pollution, and the wording is justified. However, air quality monitoring for air pollution within European protected sites is needed, and in order to be consistent with the findings of the Habitats Regulation Assessment (HRA) and to be effective, **MM125** is required to change the monitoring indicator in this regard.

Natural Environment

107. Policy NE1 sets out the basis for considering new development that has the potential to affect the TBHSPA. Subject to **MM111** relating to the exceptional circumstances of development within 400m of the SPA boundary, the policy is justified and sound. Changes to the explanation in **MM110** are necessary to reflect the involvement of Natural England in applications for new development, and to clarify that an 'appropriate assessment' is required if development is not screened out as having an effect on the SPA.
108. Policy NE2 relates to the provision of Green Infrastructure and the explanation should clarify how 'appropriate' contributions will be assessed

in **MM112**. To support the effectiveness of the Policy, the explanation requires changes through **MM114** and **MM113**.

109. In order for Policy NE4 to be consistent with national policy, **MM116** changes the wording as applying to 'priority' rather than 'key' habitat types. **MM115** explains the latest position on natural capital value in the explanatory text, and is necessary to justify the approach to green infrastructure.
110. Policy NE6 deals with fluvial flood risk. Modifications to the Policy are required to ensure that it is consistent with national policy. **MM119** sets out how development in areas at risk of flooding will be permitted, including the use of the sequential and exception tests, and the expectations in relation to Flood Zone 3b and the flood plain. Consequential changes to the explanation are set out in **MM117** and **MM118**. **MM120** sets out the latest position in the explanation in relation to surface water flooding within the Borough. **MM121** confirms the responsibilities of the Lead Local Flood Authorities, and emphasises the effect of surface water flooding within the Borough.
111. Policy NE8 relates to Sustainable Drainage Systems (SuDS). The policy is not sufficiently flexible to allow a variety of SuDS techniques to be used if necessary. **MM122** is therefore required to ensure this flexibility and to be sound.
112. Policy NE9 deals with flood risk at Farnborough Airport. In order for the Policy to be effective in relation to mitigating the effect of airport pollutants through surface water runoff, **MM123** is required.

Overall conclusion

113. Subject to the MMs recommended, the policies for the historic, built and natural environment make appropriate provision for these requirements and are justified.

Issue 7 – Whether the policies for Farnborough Airport are justified, consistent with national policy and whether they will be effective

114. Farnborough Airport is a dedicated business aviation airport, and it is home to the biennial Farnborough International Airshow and the Air and Rail Accidents Investigation Branch. There is a planning permission and legal agreement of 2010 which establishes a maximum annual number of air traffic movements relating to the civilian business aviation function, and also establishes the baseline for the policies in the LP.
115. The policies relating to the airport within the Airport Planning Policy Boundary (APPB) aim to ensure that a framework is in place to assess any proposed changes to the pattern, nature and/or number of business aviation movements above the 2010 permission. Any proposals should not result in a noise or safety environment which is any worse than the 2010 permission regime. Policy SP4 sets out the overarching requirements for any proposals including a set of criteria against which development would only be permitted if it meets these.

116. The first criteria relates to a demonstration of need in respect of any proposals to change the permitted regime. This approach is justified, without the need to be prescriptive about what that need might be. It is consistent with the approach in national policy to balancing economic benefits against all other considerations.
117. Monitoring is undertaken on aircraft noise, air quality and flight movements at the airport as a requirement of the 2010 permission. **MM47** sets this out in the accompanying text and is necessary for clarity. **MM49** to the explanation is necessary to refer to aircraft weight as being one of the factors with implications for noise and third party risk, and to be consistent with Policy SP4. **MM48** is a change to clarify how the weight of an aircraft would be defined.
118. Subject to the MMs, Policy SP4 is consistent with national policy including the NPPF, and the Airport Aviation Policy Framework (APF) 2013 in providing a framework for the consideration of the benefits and costs of business aviation at the airport in respect of any future planning applications for the civilian business aviation use.

International Conference and Exhibition Centre

119. The use of the Airport for the International Airshow also includes the provision of exhibition and associated event space within the APPB. Policy SP4 restricts development to supporting business aviation and associated airport related uses. In 2018, a permanent exhibition building was opened primarily to support the Airshow, although planning conditions attached to that permission also allow for other non-airshow events on a limited basis. **MM2** is necessary to recognise this position and to set out the importance of this site within the SEP as an economic and tourism asset to the area. **MM46** is needed to explain that supplementary proposals would be considered against policies in the LP. Subject to these modifications, the approach to focusing on supporting business aviation in Policy SP4 is sound.

Types of Flying

120. Policy SP4.1 deals with the types of flying and defines what appropriate types of flying are, and what would not be permitted. The policy is justified and reinforces the position defined by the 2010 planning permission.

Noise

121. Policy SP4.2 deals with noise and flying at Bank Holidays and weekends. The benchmark is set in criterion b). Noise guidance relating to land use planning is contained in the NPPF, the APF and the Noise Policy Statement for England (NPSE) 2010.
122. Air Navigation Guidance (ANG) 2017 is statutory guidance for the Civil Aviation Authority (CAA) on environmental objectives relating to the CAA's air navigation functions. It does refer to local government's role in land use planning which includes properly assessing noise impacts. However, it does not state that local authorities should follow the same approach to noise as set out in the ANG, or that they should be subject to CAA formal guidance

or airspace design. The responsibility of Noise Preferential Routes can rest with local authorities, although in this case it sits with the Airport owner. The proposal for Airspace Change made by the Airport owner also lies outside land use policy considerations as it is determined by the CAA.

123. The evidence on which the LP policy is based includes CD/06/03 relating to possible policy mechanisms for controlling noise at Farnborough Airport. This evidence makes reasonable assumptions and takes into account how the airport operates in respect of noise, and the steps the owner has already taken to reduce potential noise disturbance. It recommends that aircraft movement limits and noise budget contours should be kept as the central basis for the control of airport noise.
124. There is an agreed noise contour budget for the Airport. The policy would allow this to be remodelled on receipt of any planning application relevant to Policy SP4, to account for changes in modelling software or operational procedures with other parameters remaining much the same, and thereby setting a new noise contour budget. However, importantly the principle of an upper noise limit is also established.
125. In terms of whether 'Other Aviation Activity' should be included in noise considerations and Policy SP4.2, these uses include diplomatic flights, flying club and Airshow traffic. **MM46** is necessary to define these uses. The consideration of risk in terms of safety does include these other uses to inform risk contours. However, these are uses that are lawful and previously established, operating outside the planning permission which relates solely to the civilian business operation. The other uses therefore fall outside of planning control including LP policy. Policy SP4.2 is therefore justified in its purpose of dealing with planning applications for business aviation.
126. The policy is consistent with the approaches set out in national guidance including promotion of good health and good quality of life through the effective management of noise in the context of sustainable development. The policy adopts a reasonable and proportionate approach to noise considerations that will arise for any relevant planning application.

Safety

127. Policy SP4.4 relates to safety, again in relation to any proposal to change the business aviation permission. The policy uses risk contours rather than referring directly to Public Safety Zones (PSZ) as these are not specifically designed to inform decisions in the planning application process for significant change at the Airport. There is a review of the PSZ being undertaken by the Government but the results of this are not yet known.
128. The use of risk contours is clearly explained, and the use of the PSZ as a 'rough proxy' for risk contours established in the 2010 permission remains a robust approach based on the evidence. In general terms, the approach to safety and the planning regime for the Airport has been consistent for a significant period of time. It is consistent with planning decisions and based on evidence relating to safety (CD/06/01) and it is justified.

129. The lack of transparency in the modelling process relating to safety risk was a matter considered by the 2010 appeal Inspector, particularly in relation to commercially sensitive data, and this has not been resolved. However, this does not necessarily result in the policy as worded being ineffectual. Access to the use of alternative sources of data, particularly surrounding crash rates is not possible. Any specific reference to having to provide commercially sensitive data in this respect would not be effective or deliverable.
130. There was no evidence to suggest that Policy SP4.4 would not achieve the aim of any safety consequences of proposals being properly assessed and no worse than those found to be acceptable as a result of the 2010 permission. The policy requires an independent risk assessment to be submitted with any planning application, and this would ensure that the relevant safety matters are considered subject to **MM50** which is necessary to clarify in the explanation that this should relate to the risk contours, and sets out the parameters for the risk assessment.

Overall conclusion on Farnborough Airport

131. Subject to the recommended MM, the policies for Farnborough Airport are justified and consistent with national policy.

Issue 8 – Whether the infrastructure policies are justified and whether they will be effective

132. The improvement and protection of existing infrastructure and community facilities is needed to ensure that the planned growth in the LP is sustainable. Policy IN1 provides the framework to protect against loss of public and community facilities and to address needs arising from new development. The Policy makes direct reference to the Infrastructure Plan (CD/04/02) which sets out infrastructure requirements as a living document throughout the plan period, and **MM63** is necessary to acknowledge the nature of the Infrastructure Plan. To ensure that the relevant types of infrastructure are covered, **MM59** adds primary care services and SANG to the explanation where it describes the types of infrastructure covered.
133. Other policies including DE6, DE7 and DE8 make provision for sport and recreation. Specific site allocations (SP2.3, SP6, SP7, SP8 and SP10) refer to the provision of infrastructure arising from those sites. The large site at Wellesley (Policy SP5) provides for significant infrastructure. The importance of the links between the Infrastructure Plan and Policy SP5 is clarified through **MM63** and this is necessary for effectiveness.
134. The Council has not yet introduced the Community Infrastructure Levy (CIL). Until CIL is introduced the Council will continue to rely on planning obligations to secure infrastructure. In order to ensure the plan is positively prepared, **MM68** is necessary to explain the role of the Council in dealing with planning obligations and pooled contributions including SANG, supported by changes through **MM60, MM61** and **MM62**. **MM64** is a necessary consequential change.

135. **MM62** is also required as it clarifies the Council's position on viability, and it is therefore needed for effectiveness. The approach to viability is further explained through **MM14** in the accompanying text for the Spatial Strategy, which sets out the Council will seek an open book viability assessment, and commission an independent review of the assessments. This provides a more transparent approach which would be available to those who are interested in relevant planning applications, and is justified.

Critical infrastructure

136. Three of the site allocations (SP10, SP5 and SP1.4) would be likely to have a significant impact on gas infrastructure within the Borough. In addition, extensions or reinforcement proposals are unlikely to be developed by the gas provider in advance of developer requests via the formal connections process. There is some spare capacity within the existing Waste Water Treatment Works for the area. However, this is limited. It is necessary to ensure that applicants enter into early dialogue with Thames Water and the Environment Agency in relation to sewage treatment and capacity, and the gas provider.
137. The change to Policy IN1 in MM68 sets out expectations for early dialogue with relevant infrastructure providers and will ensure that significant impacts are considered early in the process. Necessary consequential changes are set out in **MM65** and **MM66**. In order for the policy to be effective, **MM67** is necessary to provide an explanation of how the decision maker should approach proposals where there is a potential loss or reduction in the capacity of an existing service or facility.

Overall conclusion on Infrastructure

138. Subject to these MMs the LP is reasonable in terms of infrastructure provision and it will be effective in bringing forward early dialogue to ensure potential issues are raised early in the planning process. It will ensure that the development is not unnecessarily delayed, and is therefore sound.

Issue 9 – Whether the site allocations are appropriate and whether they will be effective

139. A number of the site allocation policies including Town Centre allocations referred to 'working with partners' to bring forward development proposals with little indication of how a planning application would be determined. To provide clarity to the decision maker and how they should react to a proposal, a number MMs are needed to these policies. Modifications are required through **MM26, MM31, MM40, MM53,** and **MM58** and also **MM24**. These modifications assist the effectiveness of the relevant policies, and are necessary.

Wellesley (SP5)

140. This site allocation is for the Aldershot urban extension known as Wellesley. The policy seeks to deliver a significant proportion of the Borough's housing numbers. This site is on surplus military land of 150 hectares, and has been available since 2001. Outline planning permission was granted in 2014, and

it is already being built out against a delivery plan for the planned duration of the scheme until 2032. The permission includes 3,850 new homes, and a number of site requirements which are reasonable and proportionate with a Section 106 agreement that includes provision for affordable homes, transport improvements and other infrastructure.

141. The anticipated delivery rates for the homes are challenging, with significant amounts being planned to be delivered between April 2020 and March 2032. The area is already subdivided, and each area is programmed for delivery either by the same housebuilder with different brands or by separate builders. This is a realistic and appropriate approach to such a scheme. The major infrastructure to each zone is provided by the developer commissioned to oversee the development, which contributes significantly to a more prompt delivery of individual zones. Some development has been completed or is nearing completion including the building of a primary school necessary for the development. The scheme also makes sufficient provision for SANG to support the development, ensuring that residential development is not delayed. Quarterly and annual reports are submitted to the Council providing updates of completions.
142. There was no evidence presented to the examination to suggest that the build out rates are not achievable. Whilst the Council's estimates of annual delivery on the site are ambitious, ultimately on the basis of considering the positive factors of delivery set out above, the development is reasonably likely to achieve the delivery rates. The theoretical capacity built in to the overall housing requirement does account for any slowdown in build out rates. Its contribution to the overall housing numbers and knock on effects of assisting in the regeneration of Aldershot are of significance, and its allocation is justified.
143. In order to ensure that once it has been completed the new Local Neighbourhood Centre at Wellesley forms part of the retail hierarchy, and to ensure consistency with other retail centres, **MM15** is required to Policy SS2, as well as a consequential change to the accompanying text in **MM13**.
144. In order to ensure that consideration of development within the Wellesley site where this may affect historic assets within Policy SP5 is consistent with Policy HE1, **MM51** is required in stating that development should conserve and enhance the relevant conservation areas and their settings.

The Galleries (SP1.4)

145. This site allocation includes a multi-storey car park and the Arcade, as well as The Galleries shopping centre which is now closed. This allocation is a significant part of Aldershot Town Centre, and it would make a considerable contribution to residential development as well as other town centre uses. It is a phased scheme and the phasing is reasonable and represents a realistic approach to the development of the site. There is the opportunity to develop a gateway site into the town centre when arriving from the east, which would be acceptable in this area. This could be in the form of a change in building heights with the potential for a taller building to be constructed, as provided for within the policy. It is necessary to amend the

explanation through **MM25** to provide clarity on what may be appropriate in terms of building lines and heights. Other policies within the Plan such as DE1 would provide additional guidance for the decision maker in determining planning applications for taller buildings, and therefore no further changes are necessary. **MM26** is also needed to reflect the need for smaller dwelling units within the Town Centre as this is identified as a particular requirement within the SHMA.

Union Street East (SP1.5)

146. This is another large site within Aldershot Town Centre with the potential for redevelopment and refurbishment providing residential development and other uses. The policy is sound subject to **MM27** which reflects the latest understanding on the potential capacity of the site, and that there is a focus on bringing forward active town centre uses, this is necessary for effectiveness. The approach to the capacity of the site is realistic, and although viability is a consideration for the development of the site, there is no evidence that this would prevent a suitable scheme from coming forward at the proposed capacity.

147. 'Active town centre uses' are defined in the Glossary in **MM127** as a consequential change to Policies SP1.4 and SP1.5. This is necessary in order for these policies to be effective.

Hippodrome House (SP1.6)

148. This is another Aldershot Town Centre site which has the potential to provide both residential accommodation and town centre uses. The Council acknowledges that the site can be brought forward either through redevelopment or refurbishment. **MM30** and **MM29** are therefore necessary to reflect this within the policy to make it effective. The modification to the policy is also needed to set out the latest position with regards to potential capacity, and to remove references to the scale of development, as the policy already acknowledges it as a prominent gateway site. **MM28** confirms the position regarding landownership and its subsequent effect on the buildings to be covered by the site allocation.

Aldershot Railway Station and surrounds (SP1.8)

149. The proposed redevelopment for land at Aldershot Railway Station is set out in Policy SP1.8. This allocation seeks to improve the area surrounding the entrance to the train station. Alternative access, and possibly decking the existing car park following demolition of Penmark and Progress House, may not be a viable and workable alternative, and would not necessarily meet the objectives of the policy.

150. There is no detailed evidence to indicate that the allocation of the site and its requirements would have a negative effect on traffic movement to and from the station and on bus provision. The allocation is justified, and the Policy will be effective in delivering its objectives subject to **MM32** to clarify that the re-provision, not relocation, of the bus station is being sought.

Farnborough Civic Quarter (SP2.3)

151. This site is located close to the town centre and is home to a number of civic facilities. It is intended to be comprehensively redeveloped and it would make a significant contribution to the town centre principles of Policy SP2. Given the importance of the site and the number of likely stakeholders involved in the redevelopment of this site, additional wording to the explanation of Policy SP2.3 is added through **MM39** to ensure that redevelopment of the site is delivered working in partnership with these stakeholders.

Meudon House/117 Pinehurst (SP7)

152. The site is in two separate ownerships and is unlikely to be brought forward as a single comprehensive development. Policy SP7 therefore should be sufficiently flexible to provide for the site coming forward as two parcels of land, and **MM53** is therefore necessary. MM53 also sets out the latest figures on site capacity.

Aldershot Military Town (SP9)

153. Aldershot Military Town is home to the Aldershot Garrison which includes personnel accommodation, training facilities and land, administrative offices, workshops and stores as well as a number of sports facilities. In order to acknowledge the potential implications of operational and defence requirements within the area covered by Policy SP9, additional wording on how the policy requirements of the LP will be addressed, and to provide further explanation of bullet (i) of the Policy **MM54**, is needed. In order to be effective and justified the policy needs to set out that development within the area will be supported subject to certain criterion, and the first part of the paragraph is amended accordingly in **MM55**.

Blandford House and Malta Barracks (SP10)

154. This site is allocated for residential development and accompanying infrastructure. It is a key element of the delivery of SANG within the Borough. In order to represent the most up to date position in capacity, the housing number is adjusted from 150 to 165 homes in **MM56** and **MM58**. The wording in relation to SANG has also been made clearer in MM58. To ensure consistency between Policy SP9 and Policy HE2 of the LP, the wording in relation to demolition of Buildings of Local Importance in the accompanying text has been removed in **MM57**.

Conclusions on site allocations

155. Subject to the recommended MMs, the site allocations are appropriate and would be effective in supporting the spatial strategy and also the objectives for the Town centres.

Other Matters

Health and well-being

156. The policies within the Plan will contribute to the overall health and well-being of the residents and employees within the Borough. However, the role of health and well-being as being a key challenge was not recognised in the LP. This is rectified through **MM4** and is amended following the consultation on the MMs to incorporate the latest data on health issues from 2018 within the Borough.
157. I have considered whether Bovis Units, the application of the Gigahertz scale or energy grids could be used in measuring or monitoring the effects of the LP or in determining room sizes or the effect of trees on the quality of life of residents in the Borough. There is no national guidance or support for these methods. The monitoring of the LP is robust and there is no evidential support for an alternative approach. The LP requirements in terms of room sizes and the natural environment will contribute to the positive health and well-being of the residents of the Borough. It is therefore not necessary to include references to these other measures to make the plan sound.

Public Sector Equality Duty

158. In arriving at my conclusions on the issues I have had regard to the Public Sector Equality Duty contained in the Equality Act 2010 and the Council's Equality Impact Assessment (CD/01/09). In particular in relation to the protected characteristics of older people, gypsies and travellers and those with disabilities, the policies will have a generally positive impact.

Assessment of Legal Compliance

159. My examination of the legal compliance of the Plan is summarised below. The LP complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Habitat Regulations Assessment

160. The HRA including Appropriate Assessment sets out that the Plan may have some negative impacts but mitigation is secured through the plan and through the Council's approach to the provision of SANG in particular.

Sustainability Appraisal

161. Sustainability Appraisal has been carried out on the LP and the MMs, and has been adequate.

Local Development Scheme

162. The LP has been prepared in accordance with the Council's Local Development Scheme.

Statement of Community Involvement

163. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.

Overall Conclusion and Recommendation

164. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

165. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Louise Gibbons

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in italics.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Mod Ref	Paragraph/ Policy/ Criterion	Page No	Change proposed (underlined = additional text, strikethrough = deleted text)
MM1	Insert new text at the end of paragraph 2.11	10	<p><u>In July 2018, the Government published a new NPPF. The NPPF (2018) sets out, at paragraph 214, that the NPPF (2012) will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. In accordance with these arrangements, the Rushmoor Local Plan has been developed in accordance with and examined against the NPPF (2012).</u></p>
MM2	Insert new paragraph after paragraph 3.7	13	<p><u>In addition, in 2018, a permanent building to provide an exhibition facility opened at the Farnborough International site, comprising over 20,000 sq m of exhibition space and supporting infrastructure. This was conceived as primarily supporting the biennial Farnborough International Airshow, but is also available for other non-Airshow events throughout the year in accordance with conditions attached to the planning permission for its construction, offering exhibition space to the wider locality, and bringing with it direct and indirect benefits to the local economy. The future resilience of the Exhibition and Conference Centre offer on the site will be supported through the policy framework in this Local Plan, which is predicated on protecting the site for the purpose of supporting the biennial International Airshow in the first instance. Any changes to the exhibition offer, including supporting infrastructure and compatibility with the local transport network, will be considered in this context, given the desire to support the sustainable provision of exhibition facilities in this location.</u></p>

Mod Ref	Paragraph/ Policy/ Criterion	Page No	Change proposed (underlined = additional text, strikethrough = deleted text)
MM3	3.8	13	<p>The SEP has <u>identified significant variation in the performance of towns and growing extremes between more and less affluent localities in the LEP area. On the one hand, four ‘Growth Towns’ in the LEP area (including Farnborough) are currently among the best 100 performing localities in the UK and their continued success is fundamental to the economic growth of the whole LEP area. On the other hand, ‘Step-Up Towns’ (including Aldershot) face significant challenges, including an urgent requirement for the regeneration of town centres and significant investment in transport-related infrastructure to help link them with more prosperous towns. The LEP is providing significant investment for these towns through its Local Growth Deal Funding, which is awarded by the Government. In January 2017, Enterprise M3 was awarded £71.1m in the third allocation of Growth Deal Funding, which now totals £219.1m across the Enterprise M3 area.</u></p> <p><u>To support the designations of</u> identifies Aldershot as a ‘Step-Up Town’ and Farnborough as a ‘Growth Town’, To support these designations, the LEP is proposing <u>funding growth packages for both towns, the details of which are set out below.</u></p>
MM4	Section 3.2: Key Challenges (to be added after The Natural Environment)	27	<p><i>Insert new Key Challenge as follows:</i></p> <p><u>Health and Well-Being</u></p> <p><u>Context</u></p> <p><u>The relationship between planning and health is well established. As well as helping to create environments that enhance people’s health and well-being, planning can promote healthy behaviours, environmental health, mental and physical well-being, and greater equity in health.</u></p> <p>According to the Hampshire Health and Well-Being Board, psychiatric disorders were the main disabling condition for which people in Rushmoor received the Personal Independence Payment in January 2015. <u>The 2018 Health Profile for Rushmoor, produced by Public Health England, also observes that the rate of hospital stays for self-harm in the Borough was higher in 2016/17 (293 stays per 100,000 people) than in England (185.3), the South East (197.3) and Hampshire (223.1).</u></p> <p><u>Public Health England observes that the percentage of physically active adults (aged 19+) in Rushmoor in 2016/17 (65.9%) was comparable to the England average (66%) but below the South East (68.9%) and Hampshire averages (69.9%). The proportion of overweight or obese adults (aged 18+) within the Borough in 2016/17 (65.7%) was also above the England (61.3%), South East (59.7%) and Hampshire (61.6%) averages. The percentage of obese children in Year 6 (age 10-11) in Rushmoor in 2016/17 (19.8%) was comparable to the England average (20%) but above the South East (16.9%) and</u></p>

Mod Ref	Paragraph/ Policy/ Criterion	Page No	Change proposed (underlined = additional text, strikethrough = deleted text)
			<p><u>Hampshire (15.8%) averages.</u></p> <p><u>The Hampshire Health and Well-Being Board highlights that injury rates from falls in people aged 65 and over in Rushmoor were higher in 2016/17 (2,831 per 100,000 of the population) than in England (2,114), the South East (2,135) and Hampshire (2,054). However, rates of hip fracture amongst people aged 65 and over were lower in Rushmoor (482 per 100,000 of the population) than in England (575), the South East (560) and Hampshire (499).*</u></p> <p><u>Sustainability Appraisal Objective</u> Objective 2: <u>To facilitate the improved health and well-being of the population and reduce inequalities in health.</u></p> <p><u>Key Challenge 11</u> <u>To contribute to the enhancement of the physical health and mental well-being of Rushmoor’s residents.</u></p> <p><u>Role of the Local Plan</u> <u>As a cross-cutting theme, through the interaction of a number of policies:</u> <u>To promote healthy living and to facilitate good physical and mental health.</u> <u>To reduce health inequalities.</u> <u>To support locally accessible, high-quality health care.</u></p> <p><u>* Hampshire County Council (2015) ‘Joint Strategic Needs Assessment 2015: Rushmoor District’, available at http://www3.hants.gov.uk/jsna (accessed 24th August 2017); Public Health England (2018) ‘Rushmoor District Health Profile 2018’; ‘Hampshire County Health Profile 2018’, available at http://fingertips.phe.org.uk/profile/health-profiles (accessed 1st November 2018).</u></p>
MM5	Vision 2032	29	<p><u>New development optimises the use of previously developed land and is designed and built in a sustainable way (easy to get around), protecting and enhancing historic and environmental assets in the Borough and promoting local identity, particularly that relating to the Borough’s military and aviation history (great places to go, lots to do).</u> It is also designed and built in a sustainable way which meets the challenges of climate change, minimising carbon dioxide emissions and maximising energy efficiency and the use of alternative energy technologies.</p> <p><u>The Borough’s historic and environmental assets are conserved and enhanced, helping to promote local identity, particularly that relating to the Borough’s military and aviation history (great places to go, lots to do).</u></p>
MM6	Strategic Objectives F, G, H, I	32-33	Add reference to Key Challenge 11 in the relevant columns of the table.

Mod Ref	Paragraph/ Policy/ Criterion	Page No	Change proposed (underlined = additional text, strikethrough = deleted text)
MM7	Strategic Objective I	33	"To conserve and enhance the Borough's built, <u>historic</u> and natural environment..."
MM8	Paragraph 6.17	37	Using a base date of 31st March 2016 <u>1st April 2017</u> , the SHELAA identifies potential capacity for the delivery of 7,800 <u>7,739</u> dwellings up to 2032 from sites with planning permission where development has not yet started and other sites identified as having potential for housing development. In addition, 472 <u>836</u> homes have been built since 2014, and the SHELAA identifies a windfall allowance of 450 <u>420</u> homes for sites which are not covered by site-specific identification in the SHELAA because they are too small to be identified.
MM9	Table at 6.18	37-38	In total, these sources identify potential capacity in the Borough of about 8,700 <u>8,900</u> new dwellings between 2014 and 2032. This is based on: Completions - 472 <u>836</u> Sites with planning permission - 5,059 <u>4,784</u> Other sites identified in the SHELAA as deliverable/developable (not including sites identified below) - 812 <u>897</u> <u>709</u> Windfall allowance - 450 <u>420</u> The Galleries (Policy SP1.4) - 500 Union Street East (Policy SP1.5) – 130 <u>140</u> Hippodrome House (Policy SP1.6) - <u>70</u> Aldershot Railway Station and surrounds <u>Surrounds</u> (Policy SP1.8) - 30 <u>32</u> <u>30</u> Civic Quarter (Policy SP2.3) - 700 The Crescent (Policy SP6) – 159 <u>150</u> Meudon House / 115 -117 Pinehurst (Policy SP7) - 300 <u>387</u> <u>380</u> Blandford House and Malta Barracks (Policy SP10) – 150 <u>165</u> Total 8,762 <u>8,995</u> <u>8,884</u>
MM10	Paragraph 6.19	38	The estimated capacity for housing which can be delivered up to 2032 of about 8,700 <u>about 8,900</u> dwellings is sufficient to meet the objectively assessed need for 7,848 dwellings identified in the SHMA..... The estimated capacity of about 8,700 <u>about 8,900</u> dwellings, when set against the identified need...
MM11	A new paragraph to be added between paragraphs 6.19 and 6.20	38	<u>The adequacy of housing delivery, in terms of a five-year supply of housing and meeting planned housing delivery targets over the full plan period, will be assessed regularly in accordance with a housing implementation strategy. This strategy will monitor and manage delivery of this supply of housing land through annual reviews of the SHELAA, an assessment of the risks to delivery, including monitoring the availability of Suitable Alternative Natural Greenspace (SANG), and setting out actions to facilitate delivery, including proactive working with partners and developers. Progress will be reported through the Council's Authority Monitoring Report.</u>

Mod Ref	Paragraph/ Policy/ Criterion	Page No	Change proposed (underlined = additional text, strikethrough = deleted text)
MM12	Paragraph 6.20	38	The whole of Rushmoor Borough lies within five kilometres of the Thames Basin Heaths Special Protection Area (SPA), and all net new dwellings therefore need mitigation in the form of Suitable Alternative Natural Greenspace (SANG) .
MM13	Paragraph 6.26	39	<u>At Wellesley, Policy SP5 sets out that a local neighbourhood centre will be provided. This is to comprise community uses and small-scale local retail, service, and food and drink facilities within a mix of small units within Use Classes A1, A2, A3, A4 and A5.</u>
MM14	New section added after paragraph 6.27	39	<u>“Viability</u> <u>The Local Plan and Community Infrastructure Levy Economic Viability Study (2017) has considered the effect of the requirements in the Local Plan to ensure that the combined total impact of such requirements does not threaten the viability of the sites and scale of development identified in the development plan. Where schemes do not meet the policy requirements for potential viability reasons, the Council will require applicants to submit an open book viability assessment as part of the planning application submission, and this will be made available in the public domain. In such cases, the Council will commission an independent review of the viability assessment, the cost of which should be met by the applicant. Proposals will only be acceptable where the viability case is supported by the independent review and accepted by the Council.”</u>
MM15	Policy SS2	40	Rushmoor’s hierarchy of town centres, district centre, <u>local neighbourhood centre</u> and local neighbourhood facilities will be maintained and enhanced by encouraging a range of uses, consistent with the scale and function of the centres...
MM16	Paragraph 7.10	43	The Council is taking a proactive approach to regeneration in Aldershot Town Centre by working in partnership to facilitate the redevelopment of key sites. This Plan supports that approach through the allocation of key sites for redevelopment, <u>in particular (Policies SP1.4 (The Galleries) and SP1.5 (Union Street East) and SP1.6)</u> . The Council has also invested in environmental improvement schemes in the Town Centre, <u>as part of the Activation Aldershot Programme.</u>

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MM17	Policy SP1	44	<p>e. To accommodate future retail growth, which improves the health, vitality and viability of the Town Centre, prioritising the reuse and redevelopment of vacant floor space;</p> <p>f. <u>To prioritise the redevelopment of The Galleries and Union Street East to support town centre regeneration and to provide a mix of floorspace comprising retail uses, taking account of the available retail capacity, alongside other active town centre uses.</u></p> <p>f <u>g.</u> To work proactively in partnership to help to reduce the number of vacant units;</p> <p><u>h.</u> To retain and enhance Aldershot’s market and to encourage initiatives to support an attractive and competitive market;</p> <p><u>g.i.</u> To encourage linked trips...</p>
MM18	Paragraph 7.16	45	<p>The percentage threshold for the number of non-A1 uses is set at 25% <u>30%</u> for the Wellington Centre and 30% for the areas of Union Street and Wellington Street within the primary shopping frontage. This reflects the high concentration of retail units within these frontages. and more particularly within the Wellington Centre, whilst allowing for some flexibility for further changes of use. <u>In recognition of the challenging retail environment in Aldershot, the policy allows for more flexibility where the retail use is considered to be no longer viable and where there is evidence of effective marketing. For clarification, this includes situations where the percentage threshold is or would be exceeded. The Council will expect information on marketing of a retail unit to include:</u></p> <ul style="list-style-type: none"> <u>• Details of the person/company who carried out the marketing exercise;</u> <u>• Evidence that the marketing has been undertaken for a minimum period of 12 months immediately prior to the application to change the use;</u> <u>• Information explaining how the unit has been marketed (for example, for sale/rent signboard, advertisements); and</u> <u>• Details of all approaches and offers, together with full reasons as to why any offer has not been accepted.</u>
MM19	A new paragraph to be added between paragraphs 7.16 and 7.17	45	<p><u>Whilst in Wellington Street the percentage threshold is currently breached, over the plan period, the Council supports strengthening the retail function of the Wellington Street primary shopping frontage by supporting retail uses, in line with the 30% threshold. However, in the short term (2019-2024), the Council recognises the challenging retail environment, and allows for a change of use from A1, where A1 use is considered to be no longer viable and there is evidence of effective marketing for a period of at least 12 months. This area of Wellington Street forms part of the main shopping circuit around Aldershot and is a key gateway into the town centre from the High Street Multi-Storey Car Park and from the</u></p>

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			<u>Wellesley development. To deliver improvements, the Council is focusing significant regeneration work within this area of the town centre and is keen to promote a vibrant and active gateway entrance into the town centre.</u>
MM20	Paragraph 7.18	45	An assessment of the impact of the development on the appearance of the premises will be made having regard to <u>Policy DE1</u> and the content of the 'Shop Front Design Guide' supplementary planning document (SPD). <u>An assessment of the impact on the amenities of nearby residential uses will also be made having regard to Policy DE1.</u>
MM21	Policy SP1.1	46	<p>Within the primary shopping frontages in Aldershot Town Centre, development will be permitted that satisfies the following criteria:</p> <ol style="list-style-type: none"> 1. It maintains or enhances the Centre's vitality and viability; 2. It is for a use falling within Class A1, A2, A3, A4 or A5 and retains an active frontage; 3. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding <u>30%, 25% in the Wellington Centre, and 30% in Union Street and Wellington Street, unless A1 use is considered to be no longer viable and there is evidence of effective marketing for a period of at least 12 months; and</u> 4. It would not result in the loss of an A1 frontage on a visually prominent site. 5. There would be no material adverse impact on the appearance of the premises; and 6. There would be no material adverse impact upon the amenities of nearby residential uses.
MM22	Paragraph 7.22	47	An assessment of the impact of the development on the appearance of the premises will be made having regard to <u>Policy DE1</u> and the content of the 'Shop Front Design Guide' SPD. <u>An assessment of the impact on the amenities of nearby residential uses will also be made having regard to Policy DE1.</u>
MM23	Policy SP1.2	47	<ol style="list-style-type: none"> 4. It would not result in the loss of an A1 unit frontage on a visually prominent site; <u>and</u> 5. In each frontage, no more than 5% of the units will be betting shops and no betting shop is located within 400 m of the proposed site. 6. There would be no material adverse impact upon the appearance of the premises; and

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			7. There would be no material adverse impact upon the amenities of nearby residential uses.
MM24	Paragraph 7.24	48	By identifying these areas now, however, their redevelopment potential is highlighted, providing guidance as necessary for the consideration of future proposals. <u>The Council will work proactively with developers to bring forward development of these site allocations.</u> An indication of the likely phasing...
MM25	Paragraph 7.25	49	Amend paragraph wording as follows: 7.25 The Galleries site allocation comprises a purpose-built retail development, which has experienced high levels of vacancy in recent years, and extends to incorporate the High Street Multi-Storey Car Park to the north and the Arcade to the south. It is considered that the Galleries site presents an excellent opportunity to provide a residential-led mixed-use regeneration scheme in a key Town Centre location. <u>Given the expansive footprint of the site and the anticipated demolition of a number of buildings, it presents the opportunity to consider a more flexible approach to building heights and building lines that will not appear incongruous within an established street scene. In particular, the redevelopment of Phase 2 should seek to reflect the gateway opportunity presented by the Naafi roundabout as an arrival point from the east into the town centre.</u> The site is likely to come forward as a phased development, with the first phases in the short term (next five years) and the later phase in the medium term (five to ten years).
MM26	Policy SP1.4	49	Phase 1 – The Galleries (short-term): Proposals will <u>be granted planning permission where they:</u> a. Enhance retail provision along Wellington Street (primary frontage) and High Street (secondary frontage) and provide new frontage on to a public space focused on the area currently known as Little Wellington Street, <u>comprising a mix of active town centre uses;</u> b-c... d. Provide residential development in the form of a mix of 1/2/3 <u>1- and 2-bedroom units (subject to viability)</u> on upper floors, seeking to make best use of the south-facing elevation; e-f Phase 2 - High Street Multi-Storey Car Park (short term): Proposals will <u>be granted planning permission where they: ...</u> a. Provide residential development in the form of a mix of 1/2/3 <u>1- and 2-bedroom units (subject to viability)</u> and should seek to make best use of the south-facing elevation; b-d

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			Phase 3 – The Arcade (medium term): Proposals will <u>be granted planning permission where they:</u> a-b c. Provide residential development in the form of a mix of 1/2/3 1- and 2-bedroom units <u>(subject to viability)</u> .
MM27	Policy SP1.5	52	Proposals will <u>be granted planning permissions where they:</u> ... 1. deliver at least 130 <u>140</u> residential units on the upper floors of the development; ... 4. retain and reconfigure existing buildings of architectural value on the site to bring forward positive Town Centre <u>active town centre</u> uses; ...
MM28	Paragraph 7.29	53	Amend paragraph wording: The Hippodrome House site allocation comprises Hippodrome House <u>and adjacent units fronting the frontage to Birchett Road and the surface car park area</u> which are understood to be in the same ownership . It is located within the defined 'Town Centre', and a number of ground floor uses in the current building are therefore retail in nature. Hippodrome House fronts a prominent corner location, forming a key view from the arrival point of Aldershot Railway Station.
MM29	Paragraph 7.30	53	Amend paragraph wording: It is considered that an element of active frontage can be created onto Birchett Road with limited infill residential development, retaining but screening the car park to improve the street scene. With regard to Hippodrome House, Options could include refurbishment and re-cladding would have in order to improve the existing space and to enhance the visual appearance of the arrival to the Town Centre from the station. The site has the potential to come forward in the short to medium term (next five to ten years).
MM30	Policy SP1.6	54	The Council will support <u>either</u> a comprehensive <u>redevelopment or</u> refurbishment scheme that improves significantly the external appearance of Hippodrome House, a prominent <u>building in gateway into</u> Aldershot Town Centre. Ground floor uses should continue to reflect the town centre designation, with an active mix of retail, restaurants and other A-class uses. Upper floors have the potential to provide residential accommodation in a sustainable town centre location, <u>and it is considered that the allocation can accommodate at least 70 dwellings, subject to detailed design.</u> Development proposals along the frontage of Birchett Road should respect the scale

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			and massing of the surrounding townscape, noting that Hippodrome House is an exception rather than a precedent for an appropriate scale of development.
MM31	Policy SP1.7	55	The Council will work proactively with developers of Westgate Phase II. to bring forward <u>The Council will grant planning permission for</u> a comprehensive redevelopment scheme that will reinforce the established evening economy role within this part of Aldershot.
MM32	Paragraph 7.34	56	It is understood that the Bus Station site is considered surplus to requirements and can be accommodated appropriately on an alternative site. As such, <u>Subject to the a satisfactory re-provision of the bus station,</u> it is anticipated that the existing Bus Station vacated site could come forward for residential development. The existing car park to the front of the station could be reconfigured to function better as a transport interchange for train/bus/taxi drop-off with stronger pedestrian linkages into the Town Centre. Penmark/Progress House has the potential to be redeveloped for residential use. The site has the potential to come forward in the short (Bus Station, five years) and medium term (Penmark/Progress House, five to fifteen years).
MM33	Policy SP2	60	e. To improve the evening economy by supporting new leisure uses, entertainment and cultural uses, together with family restaurants, cafes and bars, particularly within Kingsmead in support of the cinema; f. <u>To retain and enhance Farnborough's market and to encourage initiatives to support an attractive and competitive market.</u> f.g. To support the development of good-quality housing... <i>Renumber criterion g, h, i and j accordingly.</i>
MM34	Paragraph 7.50	60	The primary shopping frontages are defined as ground floor units in: Queensmead (61-71 and 6056-76) <u>and</u> The Meads, including the unit occupied by Sainsbury's; and Princes Mead and the unit occupied by Asda
MM35	Paragraph 7.54	61	An assessment of the impact of the development on the appearance of the premises will be made having regard to <u>Policy DE1</u> and the content of the 'Shop Front Design Guide' supplementary planning document (SPD). <u>An assessment of the</u>

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			<u>impact on the amenities of nearby residential uses will also be made having regard to Policy DE1.</u>
MM36	Policy SP2.1	61	Amend the criteria as follows: 1. It maintains or enhances the Centre's vitality or <u>and</u> viability 2.... 3. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 20%; <u>and</u> 4. It would not result in the loss of an A1 unit frontage on a visually prominent site. 5. There would be no material adverse impact upon the appearance of the premises; and 6. There would be no material adverse impact upon the amenities of nearby residential uses.
MM37	Paragraph 7.58	62	An assessment of the impact of the development on the appearance of the premises will be made having regard to <u>Policy DE1</u> and the content of the 'Shop Front Design Guide' SPD. <u>An assessment of the impact on the amenities of nearby residential uses will also be made having regard to Policy DE1.</u>
MM38	Policy SP2.2	62	Amend the criteria as follows: 1. It maintains or enhances the Town Centre's vitality or <u>and</u> viability 2-4.. 5. It would not result in the loss of an A1 unit frontage on a visually prominent site; <u>and</u> 6. In each frontage, no more than 5% of the units would be betting shops and no betting shop is located within 400 m of the proposed site. 7. There would be no material adverse impact upon the appearance of the premises; and 8. There would be no material adverse impact upon the amenities of nearby residential uses.
MM39	Paragraph 7.61	63	Add at end: <u>To deliver this comprehensive redevelopment, the Council is committed to working closely with other landowners, developers, transport operators and public sector agencies.</u>
MM40	Policy SP2.3	64	The Council will <u>grant planning permission for</u> work with landowners, developers, transport operators and public sector agencies to secure a comprehensive redevelopment of the Farnborough Civic Quarter. This, which will be achieved through the following principles: ...
MM41	Paragraph 7.69	65	An assessment of the impact of the development on the appearance of the premises will be made having regard to <u>Policy DE1</u> and the content of the 'Shop Front Design Guide' SPD. <u>An assessment of the impact on the amenities of nearby residential uses will also be made having regard to Policy DE1.</u>

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MM42	Policy SP3.1	66	<p>Within the primary shopping frontage in North Camp District Centre, development will be permitted that satisfies the following criteria:</p> <ol style="list-style-type: none"> 1. It maintains or enhances the Centre's vitality and viability; 2. It is for a change of use falling within A1, A2, A3, A4 or A5 and retains an active frontage; 3. A change of use from A1 will not result in the number of non-A1 units exceeding 40%; <u>and</u> 4. It would not result in the loss of an A1 unit frontage on a visually prominent site. 5. The proposal would maintain or enhance the appearance of the premises; and 6. There would be no material adverse impact upon the amenities of nearby residential uses.
MM43	Paragraph 7.71	66	<p>The percentage threshold for the number of non A1 uses is set at 50%, reflecting the objective of allowing for a more diverse mix of uses. Reflecting the role of the District Centre and very limited capacity for more retail floorspace, the objective is to allow for a more diverse mix of uses in the North Camp secondary shopping frontage. ...</p>
MM44	Paragraph 7.72	66	<p>An assessment of the impact of the development on the appearance of the premises will be made having regard to <u>Policy DE1 and the content of the 'Shop Front Design Guide' SPD. An assessment of the impact on the amenities of nearby residential uses will also be made having regard to Policy DE1.</u></p>
MM45	Policy SP3.2	66-67	<p>Within the secondary shopping frontage in North Camp District Centre, development will be permitted that satisfies the following criteria:</p> <ol style="list-style-type: none"> 1. It maintains or enhances the Centre's vitality or <u>and</u> viability; 2. It is for a change of use which retains an active frontage; <u>and</u> 3. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 50%; 3. 4. <u>It would not result in the loss of an A1 unit frontage on a visually prominent site.</u> 5. The proposal would maintain or enhance the appearance of the premises; and 6. There would be no material adverse impact upon the amenities of nearby residential uses.
MM46	Paragraph 7.75	67	<p>"Since 1948, the Airport has been home to the biennial Farnborough International Airshow, a globally renowned showpiece and marketing event for the aerospace and defence industry, <u>and the use of the site for the Airshow is therefore long established.</u> Because of its occasional nature, the Airshow is exempt from planning controls. Permanent buildings to accommodate exhibition and conference facilities on the site have been constructed with the primary purpose of providing a</p>

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			<u>first class offer to support the Airshow. Supplementary proposals to support the continuation of this offer will be considered against the policies in the Local Plan, weighing into consideration the policy support for business aviation and Airshow-related activities in this location.</u> Further background information on the Airport..."
MM47	New paragraph after 7.94	70	<u>TAG Farnborough Airport provides to the Council regular monitoring reports on aircraft noise, air quality and flight movements at the Airport. These reports are prepared as a condition of the planning permission for the Airport. They cover matters such as noise monitoring, aircraft movements, and air quality and odour monitoring. They can be viewed on the Council's website at: https://www.rushmoor.gov.uk/article/3287/Airport-monitoring.</u>
MM48	Paragraph 7.115	76	...newer generations of existing aircraft types in the 50 to 80 tonne <u>MTOW</u> category...
MM49	Paragraph 7.116	76	The maximum take-off weight has direct implications <u>The weight of aircraft is one of the factors that has implications for noise output and the possible extent of third-party risk contours.</u>
MM50	Paragraph 7.126	79	The Council will consult the Civil Aviation Authority and the Health and Safety Executive on any proposals to change the pattern, nature and/or number of business aviation movements, and <u>It will</u> require the applicant to submit an independent risk assessment <u>of the implications of the changes for the 1:10,000 and 1:100,000 individual risk contours against the baseline set in Policy SP4.4 in support of any such proposals. Modelling will be based on the best available information at the time of an application and undertaken using a recognised methodology in accordance with best practice.</u>
MM51	Policy SP5	85	Amend criterion 11 as follows: 11. Has regard to the character of <u>Conserves and enhances the Aldershot Military Town and Basingstoke Canal conservation areas, and provide[s] for the retention and improvement of heritage assets and their setting[s], including listed buildings and monuments, with priority to be given to the appropriate reuse of the Cambridge Military Hospital."</u>
MM52	Policy SP6	86	The Council will work with partners to grant planning permission for a comprehensive redevelopment which provides: ...

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MM53	Policy SP7	88	Land at Meudon House/ 115-117 Pinehurst in Farnborough is allocated for sustainable, residential development. The Council will work with partners to grant planning permission for a comprehensive redevelopment which provides: 1. Approximately <u>380</u> 300 residential units, subject to further analysis and more detailed feasibility work; 2-7
MM54	Paragraph 7.155	92	<u>Where planning permission is required, for development on MoD land, the Council will expect the MoD to address the policy requirements of the Local Plan, with the specific exception of the housing mix and affordable housing policies (as set out below). Where this is not feasible due to specific operational defence requirements for the use of military buildings and land, this will be a material consideration in applying the Local Plan policies and in the determination of planning applications. During the Plan period...</u>
MM55	Policy SP9	93	The Council will work with the Ministry of Defence and other partners <u>to support development at Aldershot Military Town.</u> as appropriate, to permit development subject, where relevant, to meeting the following: <u>Proposals for development will be acceptable subject to:</u>
MM56	Paragraph 7.160	93	The site is allocated for a sustainable residential development of approximately 150 <u>165</u> homes focused on the areas of previously developed land at Blandford House and Malta Barracks...
MM57	Paragraph 7.164	94	Delete sentence: " Furthermore, the proposed development should not result in any demolition of Buildings of Local Importance. "
MM58	Policy SP10	94	The Council will work with partners to deliver <u>grant planning permission</u> for development which meets the following criteria: ... a Development of approximately 150 <u>165</u> residential homes focused on areas of previously developed land at Blandford House and Malta Barracks, using design principles which respect, and mitigate the impact on, the site's countryside setting; b. Provision of about 14 hectares of SANG <u>to avoid and mitigate the impact of development in the Borough on the Thames Basin Heaths Special Protection Area.</u> f. Measures to avoid and mitigate the impact of development upon the Thames Basin Heaths Special Protection Area, including the provision of SANG on adjacent land, and supporting Strategic Access Management and Monitoring

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			<p>measures.</p> <p><i>Renumber criterion g, h, and i accordingly to reflect deletion of criterion f.</i></p>
MM59	Paragraph 8.3	96	<p>Infrastructure includes:</p> <ul style="list-style-type: none"> • Transport: strategic and local road network, cycling and walking infrastructure, rail network, airports; • Education: further and higher education, secondary and primary education, nursery education; • Health: <u>primary care premises</u> , acute care and general hospitals, mental care hospitals, health centres, ambulance services; • Social Infrastructure: supported accommodation; facilities for groups, such as children and people with disabilities; other facilities, including community centres, cultural facilities, indoor sports facilities, open spaces, parks and play spaces; • Green Infrastructure: parks, outdoor sports facilities, waterways, residential gardens, amenity green space, allotments, natural and semi-natural green spaces; • <u>Suitable Alternative Natural Greenspace (SANG) in accordance with Policy NE1 (Thames Basin Heaths Special Protection Area)</u> • Public Services: waste management and disposal, libraries, cemeteries, emergency services, places of worship, prisons, public toilets, drug treatment centres; • Utility Services: gas supply; electricity supply; heat supply; water supply; waste water and sewerage treatment; telecommunications infrastructure, including the provision of high-speed broadband; waste and recycling facilities; • Flood Defences: informal and formal flood defences, including flood storage areas, embankments and river walls.
MM60	Paragraph 8.4	96	<p>The Council currently ensures that adequate infrastructure to help support new development is provided through the use of planning obligations (either provided directly or through pooled financial contributions). The Council may ask developers to provide contributions for infrastructure in several ways. This may be through the use of planning obligations in the form of section 106 agreements and section 278 highway agreements. Developers will also have to comply with any conditions attached to their planning permission. However, a National planning policy does not enable the Council to ask for financial contributions from small developments (ten or fewer net dwellings) or to 'pool' contributions beyond five contributors from developments for infrastructure which cannot be provided solely by one development. <u>An alternative way of funding infrastructure would be for the Council to charge a 'levy' on new development. In order to do this, the Council would need to adopt a Community Infrastructure Levy (CIL) Charging Schedule.</u></p>

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MM61	Paragraph 8.5	96	<p>"The Council remains undecided on whether <u>To date, the Council has decided not to introduce a Community Infrastructure Levy (CIL), which provides an alternative way of funding infrastructure to the use of pooled S106 contributions. The Council is mindful of the particular circumstances in the Borough whereby development is primarily on previously developed land (subject to vacant building credit), and payments are required in association with net new residential development to mitigate the impact on the Thames Basin Heaths SPA. The Council has prepared evidence on the anticipated infrastructure required and on whole plan viability to inform future progress on CIL or any future alternative infrastructure levy. The Council will report on the impact of pooling restrictions and progress on CIL or any future infrastructure levy in the Authority Monitoring Report."</u></p>
MM62	New Paragraphs to be added after Paragraph 8.5	97	<p><u>Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that are necessary to make the development acceptable in planning terms, are directly related to the development, and are fairly and reasonably related in scale and kind. The Local Plan and Community Infrastructure Levy Economic Viability Study (2017) has considered the effect of the requirements in the Local Plan to ensure that the combined total impact of such requirements does not threaten the viability of the sites and scale of development identified in the development plan. Based on this evidence and that obligations should only be sought where they are necessary to make the development acceptable in planning terms, there is limited scope for negotiation. It is also important to note that the Community Infrastructure Levy (CIL) is a non-negotiable charge.</u></p> <p><u>Under Policy NE1, new development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), including all net new dwellings, is required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Currently, in order to meet this obligation, the provision of Suitable Alternative Natural Greenspace (SANG) is required, either through contributions towards the provision of SANG identified by the Borough Council, or through the delivery of on-site SANG, the principle of which must be agreed with Natural England. The provision of new SANG falls within the definition of infrastructure¹. Therefore, in order to meet the legal obligations, the provision of new SANG will be prioritised as an item of infrastructure and delivered in accordance with Policy NE1.</u></p>

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			¹ <u>The maintenance of existing SANG, along with contributions towards Strategic Access Management and Monitoring measures (SAMM), however fall outside that definition.</u>
MM63	Paragraph 8.6	97	The Rushmoor Infrastructure Plan (IP, 2016) sets out the anticipated infrastructure required to support new development in the Borough up to 2032. (83) The Infrastructure Plan identifies the anticipated timing and phasing of infrastructure provision, where known. Some projects identified may be in the process of being delivered or be programmed to be delivered in the short-term. The delivery plans of some infrastructure providers do not run for the length of the Local Plan. Through updates to the Infrastructure Plan, future infrastructure requirements will continue to be identified in conjunction with the providers. If a CIL Charging Schedule is introduced, this will be supported by a list setting out the infrastructure which will be funded through CIL. <u>The Infrastructure Plan shows that the key requirements for new infrastructure are associated with the development of new homes at Wellesley, as set out in Policy SP5.</u>
MM64	Paragraph 8.7	97	The Infrastructure Plan shows that the key requirements for new infrastructure are associated with the development of new homes at Wellesley, as set out in Policy SP5. A further key element of infrastructure required to support new housing development in the Borough is the provision of Suitable Alternative Natural Greenspace, as set out in Policy NE1 (Thames Basin Heaths Special Protection Area). The delivery of sufficient SANG will be ongoing over the life of the Plan and will be implemented through the Council's Thames Basin Heaths Avoidance and Mitigation Strategy.
MM65	Paragraph 8.8	97	The Council will encourage <u>early</u> dialogue between <u>applicants developers</u> and service providers, including the services provided by the Council itself, to ensure that <u>the</u> new infrastructure <u>required is provided and takes account of the</u> properly acknowledges opportunities and constraints of the specific development site and its surroundings. It is important that the provision of infrastructure is timed appropriately to support new development, and the Council, where necessary, will secure this through a legal agreement, following discussion with relevant partners. In some instances, infrastructure may need to be provided prior to the occupation of the development.
MM66	Paragraph 8.9	97	The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. <u>Applicants</u> Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. This should form part of an adopted or adoptable water network. In some

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			<p>circumstances, this may make it necessary for <u>applicants</u> developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a <u>potential</u> capacity problem and no improvements are programmed by the water company, the Council will require the developer to set out how the appropriate infrastructure improvements will be completed prior to occupation of the development. <u>the applicant should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required.</u> The <u>detailed drainage strategy should be submitted with the planning application.</u></p>
MM67	A new paragraph between paragraph 8.10 and 8.11.	97	<p><u>Where a development proposal could lead to the loss or reduction in capacity of an existing service/facility, the Council will expect there to be strong justification to demonstrate why the service/facility is no longer required and that suitable alternative uses have been considered. Applicants will be required to provide adequate evidence, including evidence to demonstrate that the appropriate service providers have been consulted.</u></p>
MM68	Policy IN1	98	<p>The Council will work with partners to ensure that infrastructure and community facilities, including those set out in the Rushmoor Infrastructure Plan, are provided in a timely and sustainable manner. <u>Where appropriate, the Council will expect applicants to provide evidence that early dialogue has taken place with relevant infrastructure providers.</u></p> <p>Development will be permitted provided the following criteria are met:</p> <p>1. Development includes the provision of, or makes reasonable contributions towards providing, the infrastructure necessary community facilities, open space, transport infrastructure and other infrastructure to address the needs arising from the proposal, including the cumulative impacts of development, <u>secured either as a requirement of planning conditions or by the payment of financial contributions through planning obligations, and/or the Community Infrastructure Levy;</u></p> <p>2. Major development schemes proposed to drain to Camberley Wastewater Treatment Works will be required to consult with the Environment Agency and Thames Water at an early stage to ensure that the development can be accommodated either within the limits of capacity at the Wastewater Treatment Works or by sufficient additional capacity being made available, and that the water quality requirements of the Water Framework Directive will not be compromised;</p> <p><u>It is demonstrated that applicants proposing major development schemes have consulted with the Environment Agency and Thames Water at an early stage to ensure that the development can be</u></p>

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			<p><u>accommodated either within the limits of capacity at the Wastewater Treatment Works and wider sewerage network, or by sufficient additional capacity being made available, and that the water quality requirements of the Water Framework Directive will not be compromised as a result of the development proposals;</u>•</p> <p>3-8... The financial viability of developments will be considered when determining the extent and priority of infrastructure requirements.</p>
MM69	Paragraph 9.3	103	<p>Local planning authorities should have up-to-date evidence..... One of the The principal pieces of evidence base for the historic environment, <u>which underpins the policies in the Plan,</u> is the Historic Environment Record maintained by Hampshire County Council. <u>Other evidence that informs the Plan includes the National Heritage List for England, the Heritage at Risk Register and the list of Buildings of Local Importance, all of which are referenced below."</u> <i>Insert footnote with link to HCC Historic Environment Record.</i></p>
MM70	Paragraph 9.5	103	<p>The proposed site of the Wellesley development contains important military history, both through existing street patterns and planting and through buildings of historic interest, <u>as set out in the AUE Conservation Plan and Heritage Strategy 2012.</u> Development proposals will be expected to integrate this important historic fabric into the overall design. <i>Insert footnote with link to AUE Conservation Plan and Heritage Strategy 2012.</i></p>
MM71	Paragraph 9.7	104	<p>In January <u>September</u> 2017, Rushmoor Borough had a total of 94 <u>95</u> listed buildings^[1], including four Grade I and three Grade II*, which are the highest designations and therefore the most important listed buildings in the Borough. A total of three were 'at risk in 2015, according to Historic England Three assets were <u>included on Historic England's 2016 Heritage at Risk Register^[2], namely: [list].</u> It should be noted that <u>outside London, the Register does not include Grade II secular buildings nor Grade II listed places of worship used for worship less than six times a year and that these figures represent only a 'snapshot' in time, and the number of heritage assets which are designated and/or 'at risk' may change throughout the Plan period.</u> <i>Insert footnote with links to National Heritage List for England and the Heritage at Risk Register.</i></p>
MM72	Paragraph 9.8	104	<p>Rushmoor Borough Council also maintains <u>and updates regularly</u> a list of Buildings of Local Importance, also referred to as the Local List, <u>the criteria for which are set out in the Buildings of Local Importance SPD.</u> The Local List is a locally designated register of buildings in Rushmoor which will receive special consideration when planning proposals are submitted for approval to the Council. <u>In 2017, there were 156 buildings listed on the Local List, which is</u> The Local List is separate to the nationally designated Statutory List the latter being managed by</p>

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			Historic England. <u>It should be noted that these figures represent only a 'snapshot' in time, and the number of heritage assets which are locally designated may change throughout the Plan period.</u> <i>Insert footnote with links to the List of Buildings of Local Importance and the Buildings of Local Importance SPD.</i>
MM73	Paragraph 9.18	105	For non-designated assets (<u>including those listed as Buildings of Local Importance</u>), the Council will make a balanced judgement..."
MM74	Paragraph 9.19 Sub-heading	106	<i>Move subheading 'Heritage' to before para 9.16 on page 105.</i>
MM75	Paragraph 9.20 - 9.22	106	<i>Amend all five references in supporting text to "heritage <u>impact</u> statement"</i>
MM76	Policy HE1	106	<p><u>Proposals for development that affect heritage assets (designated and non-designated) should conserve and enhance the significance, special interest and character and appearance of the heritage asset and its setting, The Council will seek to conserve and enhance heritage assets particularly those that are recognised as having an intrinsic link to the military or aviation history of the Borough.</u></p> <p>Proposals will be assessed by reference to the significance of the asset. Substantial loss of, or harm to, nationally important sites, or military or aviation heritage assets, should only be considered in wholly exceptional circumstances.</p> <p>Proposals which affect, or have the potential to affect, heritage assets will provide a heritage <u>impact</u> statement which:</p> <p>a) Describes the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal: and</p> <p>b) Sets out the impact of the development on the heritage assets and a suggested mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and present heritage assets, as well as recording loss and advancing knowledge; and</p> <p><u>c) Demonstrates how the submitted proposals have taken into account the assessment of the impact on the significance of the asset and suggested mitigation measures.</u></p> <p><u>Proposals will be assessed by reference to the significance of the asset as detailed in the heritage impact statement. Substantial loss of, or harm to, nationally important structures, sites, or military or aviation heritage assets, should only be considered in wholly exceptional circumstances and where the loss and harm is outweighed by the public benefits of the proposals.</u></p>

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			<p>Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.</p> <p><u>The Council will support development proposals which do not adversely affect the significance, special interest and character or appearance of nationally and locally designated heritage assets including listed buildings, scheduled monuments and historic parks and gardens and their setting.</u></p> <p><u>Development proposals which affect a Listed Building or its setting will be expected to:</u></p> <p><u>a) conserve or enhance the special architectural or historic interest of the building's fabric, detailed features, appearance or character and setting;</u></p> <p><u>b) retain the special interest that justifies its designation through appropriate design that is sympathetic both to the Listed Building and its setting and that of any adjacent heritage assets in terms of its siting, size, scale, height, alignment, materials and finishes (including colour and texture), design and form; and</u></p> <p><u>c) respect the historic curtilage or context or its value within a group and/or its setting including its historic landscape or townscape context.</u></p> <p><u>When considering proposals that affect the significance of non-designated heritage assets, a balanced judgement will be made having regard to the significance of the asset, the scale of any harm and the public benefits of the development.</u></p>
MM77	Paragraph 9.23	107	<p><u>The demolition or partial demolition of a heritage asset will clearly have a harmful impact on the significance and historic fabric of the asset and its setting.</u> Any proposed demolition or partial demolition of a designated heritage asset, non-designated (local) heritage asset or structures associated with the asset will only be permitted where it is considered that the works will not have a detrimental impact on the significance or historic fabric of the Asset.</p>
MM78	Policy HE2	107	<p>The demolition or partial demolition of a heritage asset, particularly those with an intrinsic link to the aviation or military history of the Borough, will not be permitted unless every practical effort has been made to retain it, <u>the loss of the asset is necessary to achieve public benefits, those public benefits outweigh the loss, and it is demonstrated that the new development will proceed within a reasonable and agreed timescale.</u> The more significant the asset, the greater the weight applied <u>public benefits required</u>, and demolition of nationally important assets <u>of the highest significance</u> should be wholly exceptional. In particular the Council will consider:</p>

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			<p>a. The condition of the building/structure and the cost of repair and maintenance in relation to its importance and value derived from its continued use; b. The adequacy of efforts to retain the building/structure in use; and c. Whether demolition is necessary to achieve substantial public benefits.</p>
MM79	Paragraph 9.26	108	<p><u>The Council will review periodically the Borough's conservation areas and seek to develop Conservation area character appraisals/management plans to provide the analysis of what features make a is positive and or negative contribution to the significance of the conservation area, and identify so that opportunities for beneficial change or the need for additional protection and restraint including the implementation of Article 4 Directions may be identified.</u> The information in appraisals is also <u>can</u> be helpful to those considering investment in the area and can <u>also</u> be used to guide the form and content of new development.</p>
MM80	Paragraph 9.27	109	<p>New sites of archaeological remains are discovered all the time, most commonly in areas where there has been little previous archaeological investigation. <u>In cases where remains are identified but their extent and significance are unknown, the Council will require an archaeological impact assessment including field evaluation (intrusive or non-intrusive fieldwork) to determine their character, extent, quality and preservation, and to enable an assessment of their significance in a local, regional, national or international context as appropriate.</u></p>
MM81	Policy HE4	109	<p>If there is evidence....the Council will require developers to undertake an archaeological impact assessment, <u>including field evaluation.</u> Where it is subsequently identified that there are significant archaeological remains, these should normally be preserved in situ. <u>For scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equal significance to scheduled monuments, loss or substantial harm (through the removal of remains) should be wholly exceptional and any loss or harm only be outweighed by public benefits for the proposed scheme. If the Council concludes that this is the case, Where the Council concludes that preservation in situ is not justified it will seek, prior to the development, appropriate provision for the excavation, recording and public presentation of remains. The ability to record loss will not be a factor in deciding whether such loss should be permitted."</u></p>
MM82	New section to be added after paragraph 9.30 in	110	<p><u>Climate Change</u> <u>9.31 The 2012 NPPF requires local planning authorities to adopt</u></p>

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	supporting text for Policy D1		<p><u>“proactive strategies to mitigate and adapt to climate change” (paragraph 94) and have a “positive strategy to promote energy from renewable and low carbon sources” while “ensuring that adverse impacts are addressed satisfactorily” (paragraph 97). This includes supporting “community-led initiatives for renewable and low carbon energy” and identifying “opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers” (paragraph 97).</u></p> <p><u>9.32 The Council has adopted a Climate Change Strategy to help the Borough mitigate against and adapt to climate change and continues to support local initiatives to reduce energy use . The Local Plan as a whole promotes sustainable transport modes and the reduction of car use by directing development towards urban areas and away from the countryside. In respect of energy from renewable and low carbon sources, the Council will have regard to the North Hampshire Renewable Energy and Low Carbon Development Study 2010 , which assesses potential for these technologies across Rushmoor, Hart and Basingstoke and Deane. Given the Borough’s urban character, there is particular potential for:</u></p> <ul style="list-style-type: none"> <u>• district heating with combined heat and power (CHP), which could be powered by a local biomass supply; and</u> <u>• micro-generation, in particular solar water heating, photovoltaics and heat pumps, which could be used on new development or retrofitted to existing properties.</u> <p><u>9.33 Proposals for new and existing development should 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 and low energy at the appropriate scale, including micro-generation. The Council recognises that even small-scale projects can provide a valuable contribution to cutting greenhouse gas emissions and, in determining planning applications for renewable and low carbon development, will not require applicants to demonstrate the overall need for renewable or low carbon energy.</u></p>
MM83	Policy D1	110	<p><i>Amend title of Policy <u>DE1</u> and introduce a new criterion relating to amenity:</i></p> <p>New development will be required to make a positive contribution towards improving the quality of the built environment. It will, <u>where relevant to the proposal:</u></p>

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			<p>a. Include high-quality design that respects the character and appearance of the local area;</p> <p>b. 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;</p> <p><u>c. Not cause harm to the proposed, existing and/or adjacent users by reason of:</u></p> <p style="padding-left: 40px;"><u>1. loss of light, privacy or outlook;</u></p> <p style="padding-left: 40px;"><u>2. noise, light pollution, vibration, smell, or air pollution;</u></p> <p><u>d.</u> Respect established building lines;</p> <p><u>e.</u> Take account of adjacent building heights, fenestration, roof and cornice lines;</p> <p><u>f.</u> Use materials sympathetic to local character;</p> <p><u>g.</u> Give consideration to the introduction of contemporary materials that respect or enhance existing built form;</p> <p><u>h.</u> Include a level of architectural detail that gives the building visual interest for views both near and far;</p> <p><u>i.</u> Make a positive contribution to the public realm – facing the street, animating it and ensuring that all open space within the curtilage of the site is positively used and managed;</p> <p><u>j.</u> Where appropriate ensure <u>Ensure</u> that existing landscape features (for example, topography (the surface shape) and trees worthy of retention) are included within the overall design of the scheme from an early stage;</p> <p><u>k.</u> Give appropriate consideration to the relationship between public and private space;</p> <p><u>l.</u> Have regard to the relevant character appraisal if proposing development within a conservation area; and</p> <p><u>m.</u> Demonstrate, through a supporting design and access statement, that the wider, existing context has been factored into the proposals through analysis of the following.....</p> <p><u>n.</u> All development proposals will demonstrate how they incorporate sustainable construction standards and techniques. Major commercial developments over 1,000 sq m 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).</p>
MM84	Policy DE2	112	<p>Where planning permission is required, proposals for new residential (<u>Use Class C3</u>) units (including change of use or conversions) will ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers. The Council will assess <u>require</u> all <u>such</u> development proposals against to meet the following minimum standards:</p>
MM85	Policy DE3	115	<p>In exceptional circumstances, where site conditions make it impossible to provide private open space for a# dwellings, additional internal living space equivalent to the private open space requirement will <u>may be</u> added to the minimum GIA of</p>

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			the dwelling, as outlined in Policy DE2.
MM86	Policy DE4	116	New non-residential development of 1,000 sq m gross external area (GEA) or more will provide evidence on completion, through the submission of a post-construction BREEAM certificate, of achievement of the BREEAM “excellent” standard for water consumption (or any future national equivalent).
MM87	Policy DE5	116	<p>Where planning permission is required for:</p> <p>a. Residential extensions, and / or</p> <p>b. Conversions, and/or</p> <p>c. Sub-division;</p> <p>Proposals will be required to:</p> <p>a. Respect and enhance the local, natural or historic character of the environment, paying particular regard to scale, materials, massing, bulk and density;</p> <p>b. Ensure that there is no detrimental impact on neighbouring properties in respect of residential amenity and access to daylight;</p> <p>c. Ensure that there is no detrimental impact on the amenity of occupants;</p> <p>d. Ensure that an appropriate level of amenity space is provided;</p> <p>e. Provide adequate off-street parking to serve the property; and</p> <p>f. Ensure no adverse effect on trees worthy of retention.</p> <p>The Council will seek to minimise the loss of homes in the Borough by resisting development that would involve the net loss of residential units, unless it can be demonstrated that the proposal will:</p> <p>a. Enable sub-standard units to be enlarged to meet residential space standards;</p> <p>b. Enable existing affordable homes to be adapted to address an identified shortfall in larger affordable dwelling sites;</p> <p>c. Be a more appropriate use because of existing environmental conditions;</p> <p>d. Ensure that a building of architectural or historic importance can be retained or renovated;</p> <p>e. Be incorporated in a comprehensive scheme of redevelopment where there is no net loss of residential units;</p> <p>or</p> <p>f. Provide an essential community facility which cannot be provided elsewhere.</p>

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MM88	Paragraph 9.56	118	Major areas of recreational space are shown on the Policies Map, but there are also other areas of open space which are used for sport or recreation, or have visual amenity. <u>Allotments are a form of open space, used for recreational activity, and existing allotments are identified on the Policies Map as open space.</u>
MM89	Paragraph 9.57	118	Any ancillary facilities should be of a scale and siting designed to minimise the impact on the open space. <u>Criterion 3 of Policy DE6 sets out that in accordance with national policy, existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements, in meeting need in Rushmoor over the plan period. The Rushmoor Open Space, Sport and Recreation Study (2014) sets out the baseline assessment and concludes that there is a need to protect against the loss of existing open space.</u>
MM90	Paragraph 9.59	118-119	NEAPs - 1.16 sites per 1,000 head of population within 14 <u>15-19</u> age group LEAPs - 2.82 sites per 1,000 head of population within 8-14 <u>13</u> age group LAPs - 1.16 <u>4.86</u> sites per 1,000 head of population within 0-7 age group
MM91	Policy DE6	119	Development will not be permitted on areas of open space used for recreation or outdoor sport or having visual amenity unless: 1. Re-provision is made elsewhere of equivalent or better community benefit in terms of quality, quantity and accessibility; or 2. The Development is for sports and recreation provision, the need for which clearly outweighs the loss; <u>or</u> 3. <u>An assessment has been undertaken, which has clearly shown the open space to be surplus to requirements in meeting need in Rushmoor over the plan period.</u>
MM92	Paragraph 9.66	120	9.66 To demonstrate indoor and built sport and recreation facilities are no longer viable, the Council will require the submission of full financial evidence in the form of a commercial viability study. <u>The evidence should set out how retention of the facilities has been fully explored. This should include realistic, appropriate and genuine marketing of the facilities for its existing and alternative sport and recreation use, for a period of at least 12 months prior to the submission of a planning application. Evidence is also required to demonstrate that there is no longer a need for the existing facilities or an alternative indoor and built sport and recreation use.</u>
MM93	Policy DE8	121	To promote healthy lifestyles and encourage physical activity, (footnote 102) indoor and built sport and recreation facilities

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			<p>will be promoted by:</p> <ol style="list-style-type: none"> 1. Safeguarding the existing viable indoor and built sport and recreation facilities; 2. Supporting proposals for the refurbishment, replacement and extension of existing indoor and built sport and recreation facilities; and 3. Supporting development for new and improved indoor and built sport and recreation facilities in sustainable locations, for which there is a strategic need. <p><u>The loss of existing indoor and built sport and recreation facilities will be resisted unless replacement facilities of an equivalent or increased quantity and standard are proposed in a location accessible to the current catchment area or it is demonstrated that:</u></p> <ol style="list-style-type: none"> a. <u>The existing use is unviable; and</u> b. <u>There is no longer a need for the existing facilities or an alternative indoor and built sport and recreation use.</u>
MM94	Paragraph 10.3	130	<p>A mixed community requires a variety of housing to provide homes for different households. The Council recognises that a mix of types of home is required to promote sustainable communities. The Rushmoor Housing and Homelessness Strategy 2017-2022 (2017) aims to ensure that Rushmoor's residents have access to good quality homes that are affordable and appropriate to their needs. It identifies the need for housing for specific <u>different</u> groups and includes actions in relation to the delivery of specialist housing. <u>These groups include those leaving the Army and their families, who have priority status for home ownership schemes and 'local connection' status with any local authority to which they present as homeless, and the Nepali community, many of whom are former Gurkhas and their families who have settled in the Borough. The Council works in partnership with providers to meet the specialist needs of disabled veterans and the older population through the Housing and Homelessness Strategy and to address issues of access to housing.</u></p>
MM95	Paragraph 10.8	131	<p>To support self- and custom-build housing, the Council will require a minimum <u>target</u> of 5% of homes on sites of 20 or more dwellings...'</p>
MM96	Policy LN1	131	<p>b. The most up-to-date evidence on local housing needs, <u>as set out in the SHMA (2016) or any subsequent update;</u></p>
MM97	Insert new paragraph between 10.10 and 10.11	132	<p><u>Vacant Building Credit (VBC) [footnote: included in National Planning Practice Guidance in May 2016] is intended to incentivise brownfield development on sites with empty or redundant buildings. If applicable, the credit is applied when calculating affordable housing contributions on developments where a vacant building is either converted or demolished and is equivalent to the existing gross floorspace of relevant vacant</u></p>

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			<u>buildings. The credit does not apply where the building has been abandoned. In considering VBC applications, the Council will have regard to the intention of national policy, which is to incentivise brownfield development and not simply to reduce the affordable housing requirement of schemes that would have come forward anyway.</u>
MM98	Paragraph 10.15	132	tenure mix is likely to be about 70% for rent and 30% for intermediate (home ownership), subject to local needs, the size of site, its location, <u>site-specific circumstances</u> and viability.
MM99	Policy LN3	136	The Council will safeguard existing sites for Travelling Showpeople. Where additional local need is demonstrated <u>Planning permission will be granted</u> for new sites for Gypsies and Travellers and Travelling Showpeople, including transit sites, planning permission will be granted, or sites identified to meet this need- provided that the following criteria are met:....
MM100	Policy LN4	140	Proposals for housing designed specifically to meet the identified needs of older people and others with a need for specialist housing, including specialist housing care, will be permitted where: 1. They meet a proven identified need; 2. 1. Sites are appropriately located in terms of access to facilities, services and public transport; and 3. 2. An appropriate tenure mix is provided. Where there is evidence of an identified unmet need in the local area, larger- <u>Larger-scale</u> new residential developments will be expected to consider the incorporation of specially designed housing/specialist accommodation, in line with the above criteria, to meet the needs of older people and people with support needs.
MM101	Paragraph 10.48 and add new paragraph	143	10.48 The policy recognises the need to provide flexibility <u>where an individual retail use is considered to be no longer viable</u> whilst protecting a core of retail facilities. Where permission is sought for a change of use from A1 uses, <u>and</u> where there is already a significant proportion of non-A1 uses or the facilities only include one or two units, the premises should have been appropriately marketed for an A1 use for a minimum period of twelve months. Applicants will need to demonstrate that the property has been marketed at a reasonable price, appropriate to the location, and condition and quality of floorspace. 10.49 As set out in Section 2... <u>10.50 Applicants should have regard to criterion c in Policy DE1 (Design in the Built Environment) in relation to impact on the amenities of proposed, existing and/or adjacent users.</u>

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MM102	Policy LN6	143	<p>Within Local Neighbourhood Facilities, development will be permitted that satisfies the following criteria:</p> <p>a) It would not undermine the dominant local retail and service function of the Local Neighbourhood Facility, and the proposed use would attract footfall from the local area;</p> <p>b) It creates an active frontage;</p> <p>c) A change of use from A1 will not result in an over-concentration of the number of non-A1 units to the detriment of the retail function of the Local Neighbourhood Facility, <u>unless the A1 use is considered to be no longer viable and there is evidence of appropriate marketing for a minimum period of twelve months; and</u></p> <p>d) There would be no material adverse impact upon the amenities of nearby residential uses.</p>
MM103	Paragraph 10.59	145	<p>Delete paragraph: Since April 2005, under permitted development, a pub (A4 use) can change into a shop (A1 use), a 'financial and professional service', such as an estate agent and building society (A2 use), or a café/restaurant (A3 use) without the need for planning permission. Whilst planning permission may be required for certain aspects of the development, such as external alterations, the principle of the change of use is considered permitted development, in accordance with the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), unless the premises is identified as an 'Asset of Community Value'.</p>
MM104	Paragraph 10.61	146	<p>10.61 Proposals seeking the loss or re-use of a public house for alternative purposes will be required to show that the facility has been marketed appropriately <u>effectively</u>. The marketing should be realistic, appropriate and genuine. A record of all marketing should be submitted with the application proposal, <u>including the following:</u></p> <p>a) <u>Confirmation by a commercial property agent that the premises were marketed extensively for A4 use at a reasonable price in relation to use, condition, quality and location of floorspace and for a minimum period of 12 months prior to the submission of the application;</u></p> <p>b) <u>Evidence that contact information was posted in a prominent location on site, in the form of an advertising board (subject to advertising consent, if required) and that property details/particulars were made available to inquirers on request;</u></p> <p>c) <u>An enquiry log showing the number of enquiries, their nature, how they were followed up and why they were unsuccessful; and</u></p> <p>d) <u>A copy of all advertisements in the local press and relevant trade journals (spread at appropriate time intervals throughout the marketing period).</u></p>

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MM105	Policy LN8	146	<p>Development proposals resulting in the loss of a public house will be permitted where it can be proven that there is no longer-term need for the facility. In order to justify no longer-term need, the applicant will need to provide <u>the following evidence of effective marketing for A4 use for a period of at least twelve months.</u> that the premises have been marketed effectively <u>In determining such applications, the Council will have regard to the content of the 'Development affecting Public Houses' Supplementary Planning Document.</u></p> <p>a. Confirmation by a commercial property agent that the premises were appropriately and extensively marketed; b. Property marketed for the appropriate use or uses as defined by the relevant planning policy for a period of 12 months minimum prior to the submission of the application; c. Property marketed at a reasonable price, including in relation to use, condition, quality and location of floorspace; d. Contact information posted in a prominent location on site, in the form of an advertising board (subject to advertising consent, if required); e. Property details/particulars available to inquirers on request; f. An enquiry log showing the number of enquiries, their nature, how they were followed up and why they were unsuccessful; and g. A copy of all advertisements in the local press and relevant trade journals (spread at appropriate time intervals throughout the marketing period).</p>
MM106	Policy PC3	153	<p>c. The proposal would generate employment; and d. The proposal would not be detrimental to the function and operation of the wider site; and/or e. The site is not appropriate for the continuation of its present or any B-class employment use due to a significant detriment to the environment or amenity of the area.</p>
MM107	Policy PC4	154	<p>In considering the use of the wind tunnels, the Council will support proposals that enable these historic assets to be utilised whilst conserving the wind tunnels' original character <u>and significance.</u></p>
MM108	Policy PC5	156	<p>Delete criterion c)</p> <p>That the proposal would not have a harmful effect on the separation of Farnborough and Fleet.</p> <p><i>Renumber criterion d and e accordingly.</i></p>
MM109	Policy PC8	159	<p>Delete criterion a)</p> <p>Delivering improvements to primary and secondary schools, and further and higher education;</p>

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			<i>Renumber criterion b, c, d and e accordingly.</i>
MM110	Paragraph 12.7	162	All other applications for new development, including applications for non-residential development, will also need to be screened to assess, <u>in agreement with Natural England,</u> whether they will have a likely significant effect, and be subject to a habitats regulations <u>an appropriate</u> assessment where they are likely to have a significant adverse impact on the integrity of the SPA. ...
MM111	Policy NE1	163	Residential development that would result in a net gain of units will not be permitted within 400m of the SPA boundary unless, <u>in exceptional circumstances and in agreement with Natural England...</u>
MM112	Insert after Paragraph 12.14	164	<u>Where suitable, development proposals will be expected to contribute towards the improvement and enhancement of green infrastructure in accordance with the Green Infrastructure Strategy and associated standards, including those set out under Policy DE6 (Open Space, Sport and Recreation). The amount of Green Infrastructure that should be provided, along with its character and distribution, will depend on the site-specific circumstances and the type of development proposed.</u> <u>In accordance with Policy IN1, appropriate contributions may be sought towards strategic enhancement, restoration and creation projects. These projects will be set out in the latest version of the Infrastructure Plan. The size of contribution will be linked to the scale of the development and the resulting new green infrastructure should be located as close as possible to the development it is intended to serve. Each application received will be considered on its merits with respect to any contributions required for green infrastructure provision.</u>
MM113	Paragraph 12.17	164	The Council will look to strengthen these corridors, where opportunities arise, <u>for example through the use of Sustainable Drainage Systems (SuDS),</u> and will resist development which would weaken them.
MM114	Paragraph 12.18	164	Where there are developments adjacent to the river <u>a water body,</u> opportunities should be sought to maintain and enhance the river corridor and to contribute to the Borough's green infrastructure network. Such opportunities may include the provision of in-channel vegetation, especially along the margins, the creation or restoration of bank habitats and/or an undeveloped buffer zone adjacent to the river <u>water body.</u>
MM115	Insert after Paragraph 12.27	167	<u>The Government recognises that the country's prosperity, security and well-being depend on a healthy natural environment, including our landscapes, forests, air, fresh and marine waters and soils, and the habitats and wildlife they support (also known as our natural capital). The Government is working with the Natural Capital Committee, an independent</u>

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			<u>committee advising on the sustainable use of natural capital, to develop a comprehensive 25-year plan for the environment. As part of this work, practical approaches to enable people to value nature as part of decision making are being developed.</u>
MM116	Policy NE4	168-169	...clearly demonstrated that: 1. There will be no adverse effect on the conservation status of <u>key priority</u> species;...5. There will be no loss or deterioration of a <u>key priority</u> habitat type, including irreplaceable habitats; and 6. There will be no adverse effect to the integrity of linkages between designated sites and <u>key priority</u> habitats.
MM117	Replace Paragraph 12.41	171	<p>There may be a requirement for a sequential test/approach for new development proposed in Flood Zone 2 or Flood Zone 3, in accordance with national policy and guidance. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.</p> <p><u>The sequential approach should be followed for all development (i.e. locating development in the lowest risk flood areas within a site, taking account of all sources of flood risk). The Sequential Test is required for all development in Flood Zones 2 and 3 (subject to some exceptions listed in the National Planning Practice Guidance (NPPG)), and the Exception Test is required for some development in Flood Zones 2 and 3 as identified in the NPPG.</u></p>
MM118	Insert after Paragraph 12.42	171	<u>The Rushmoor Local Plan is supported by a Strategic Flood Risk Assessment which takes account of advice from the Environment Agency and other relevant flood risk management bodies, such as the lead local flood authority (Hampshire County Council) and drainage authorities. It looks at the risk from sources of flooding across the area and surrounding areas in the flood catchment. The risks examined include surface water, climate change, groundwater, sewers and flooding from reservoirs, canals and other artificial sources.</u>
MM119	Policy NE6	171	<p>New development will be directed to areas of lowest risk, giving highest priority to Flood Zone 1.</p> <p>Development with the highest vulnerability classification should be located within areas at lower flood risk, and thereafter, more vulnerable development should be considered, and then less vulnerable.</p> <p><u>Development proposals in Flood Zone 2 and Flood Zone 3 need to demonstrate that:</u></p> <p><u>1. The development provides wider sustainability benefits to the community that outweigh flood</u></p>

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			<p>risk; and 2. The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere. There may be a requirement to undertake a sequential test subject to the type of development proposed.</p> <p><u>Development proposals in areas at risk of flooding as identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment (SFRA) will be permitted provided that:</u></p> <p><u>(a) the vulnerability of the proposed use is appropriate for the level of flood risk on the site;</u> <u>(b) the proposal passes the sequential and exception test (where required) as outlined in national policy and guidance</u></p> <p>Development proposals within Flood Zone 2 and Flood Zone 3 will be appropriately flood resilient and resistant, including safe access and escape routes where required, and ensure that any residual risk can be safely managed.</p> <p><u>With the exception of the provision of essential infrastructure, 'undeveloped' Flood Zone 3b will be safeguarded for flood management purposes.</u></p> <p><u>Developments proposed within the flood plain should include an assessment of the impact of climate change using appropriate climate change allowances over the lifetime of the development so that future flood risk is taken into account</u></p>
MM120	Replace Paragraph 12.43 to 12.48	172	<p>12.43 In 2009, the Department for Environment, Food and Rural Affairs (Defra) produced a 'National Rank Order of Settlements Susceptible to Surface Water Flooding', ranked by estimated number of properties susceptible to surface water flooding resulting from severe rainfall.</p> <p>12.44 This ranked list of settlements was developed using the Environment Agency's 'Areas Susceptible to Surface Water Flooding' maps. These maps categorise areas within three bandings: less, intermediate and more susceptible.</p> <p>12.45 Priority locations within Hampshire were identified by Defra where evidence indicating the risk and potential impact of surface water flooding could be highest, and where surface water management plans (SWMPs) would be most effective to understand and manage flooding. Using this assessment as well</p>

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			<p>as historic flooding information, Defra identified a need for SWMPs to be protected for three priority areas: Rushmoor, Basingstoke and the central Hampshire chalk catchment (groundwater flooding).</p> <p>12.46 The Rushmoor Surface Water Management Plan (2012) was drafted by Hampshire County Council and describes the significant features which can impact on surface water flood risk in the Borough. This data was described and assessed on a ward by ward basis, looking at each area's susceptibility to flooding based on information from past flood events and the likelihood of future flooding based on national modelling data.</p> <p>12.47 This allowed a hierarchy of flood risk in the Borough to be identified, along with surface water flooding 'hotspots' where further, more detailed work was required into the causes of, and possible responses to, flood risk. Whilst the SWMP was never formally adopted, the findings of the document were endorsed by the Strategic Flood Risk Assessment.</p> <p>12.48 Eleven sites have a significantly higher 'risk index' of surface water flooding than other parts of the Borough. These areas are identified on the Policies Map. Within these defined areas, any new development will need to incorporate flood resilient measures that can satisfactorily address/manage the direct impacts associated with flood events. Such management options may include the raising of floor levels (typically 600 millimetres above ground level) or, where not possible, raising floor levels as high as possible and providing flood resilient measures to 600 millimetres above ground level.</p> <p><u>12.43 The Rushmoor Borough Council Level 1 Strategic Flood Risk Assessment (2015) considers flood risk from surface water and all other sources. It has taken into account and endorsed the findings of Hampshire County Council's draft Rushmoor Surface Water Management Plan (2012) (147). The assessment identifies eleven sites that have a significantly higher 'risk index' of surface water flooding than other parts of the Borough. These areas are identified on the Policies Map (148). Within these defined areas, any new development will need to incorporate flood resilient measures that can satisfactorily address/manage the direct impacts associated with flood events. Such management options may include the raising of floor levels (typically 600 millimetres above ground level) or, where not possible, raising floor levels as high as possible and providing flood resilient measures to 600 millimetres above ground level.</u></p>

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MM121	Replace Paragraph 12.49	172	<p>Since April 2015, lead local flood authorities have had the responsibility of managing surface water flood risk and commenting on surface water flood risk for planning applications.</p> <p><u>Since April 2015, Lead Local Flood Authorities who have responsibility for managing the risk of flooding from surface water have become a statutory consultee on surface water drainage on planning applications for major developments.</u></p>
MM122	Amend Policy NE8	174	<p>The implementation of integrated and maintainable SuDS (<u>using the SuDS management train principles</u>) in all flood zones for both brownfield and greenfield sites is required. Infiltration techniques should be investigated in the first instance as this mimics the natural hydrological process. In areas where infiltration is considered to be inappropriate (for example, contaminated land), other SuDS techniques will be considered. For greenfield developments, the peak run-off rate/volume from the development to any drain, sewer or surface water body for the 1-in-1-year and 1-in-100-year rainfall event must not exceed the greenfield run-off rate for the same event. For brownfield developments, the peak run-off rate/volume from the development to any drain, sewer or surface water body for the 1-in-1-year and 1-in-100-year rainfall event must be as close as reasonably practical to the greenfield run-off rate from the development for the same rainfall event, but should never exceed the rate of discharge from the existing development on site.</p>
MM123	Amend Policy NE9	175	<p>All development proposals within the Farnborough Airport Planning Policy Boundary will incorporate a site-specific flood risk assessment <u>with measures to ensure that pollutants are contained</u> and that ensures a greenfield discharge rate or better is achieved in order to not further exacerbate surface water flooding problems downstream.</p>
MM124	Indicator I4	191	<p>Delete reference to 'Heritage England' in 'Delivery Partners' column and replace with '<u>Historic England</u>'.</p> <p>Amend I4 as follows: '<u>Number and status of listed buildings heritage assets</u>'</p> <p>Amend Base figures as follows: <u>95 listed buildings, 3 scheduled monuments, one registered historic park and garden included in National Heritage List for England; 3 heritage assets on national Heritage at Risk Register; 156 heritage assets on list of Buildings of Local Importance; 8 Conservation Areas.</u></p> <p>Amend Annual Monitoring Target as follows: <u>Net gain/loss and</u></p>

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			Number of buildings <u>assets</u> at risk
MM125	Indicator I6	192	Changes proposed under following columns in the table: " I6. Air quality monitoring on the SPA/SAC and nitrogen deposition on European Sites. " " As set out in the HRA, NOx deposition: Thames Basin Heaths SPA: 15.58 Kg N/ha/yr. Thursley, Ash, Pirbright and Chobham SAC: 16.38 Kg N/ha/yr. Actual Nitrogen Deposition (Kg N/ha/yr) on habitats within European Sites, as set out in the HRA (sourced from UK Air Pollution Information System)" " Within the critical threshold load for the relevant habitat" "The Council will work with partners to consider the best way to monitor changes in air quality <u>and nitrogen deposition</u> across the Borough and on European Sites. "
MM126	Glossary	197	<i>Add:</i> <u>Other Aviation Activity: the use of the Airport by the MOD, diplomatic flights, the DERA (Defence Evaluation and Research Agency) flying club (up to 2,500 recreational movements per year) and flying at, or associated with, the Farnborough International Airshow.</u>
MM127	Glossary	197	<i>Add:</i> <u>Active Town Centre Use</u> A use that generates footfall by attracting visiting members of the public and which provides an active frontage. Defined as a use falling within Class A (A1, A2, A3, A4, A5), Class D (D1, D2) or a similar sui generis use which attracts visiting members of the public.
MM128	Glossary	198	<i>Add:</i> <u>Article 4 Direction</u> A direction made by a local planning authority or the Secretary of State under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) which withdraws specified permitted development rights across a defined area. An Article 4 direction does not prevent the development to which it applies but instead requires that planning permission is obtained from the local planning authority for that development.
MM129	Glossary	203	<i>Add :</i> <u>Heritage Impact Statement</u> A document which: a) <u>Describes the significance of the heritage asset (see above) and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential</u>

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			<p><u>impact of the proposal: and</u> <u>b) Sets out the impact of the development on the heritage assets and a suggested mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and present heritage assets, as well as recording loss and advancing knowledge; and</u> <u>c) Demonstrates how the submitted proposals have taken into account the assessment of the impact on the significance of the asset and suggested mitigation measures.</u></p>
MM130	Glossary	210	<p><i>Add:</i> <u>Secular</u> <u>Not connected with religious or spiritual matters. Examples of secular buildings include museums, town halls, university buildings and railway stations.</u></p>
MM131	Housing Trajectory Table	217	Update housing trajectory table, as below
MM132	Housing Trajectory Graph	218	Update housing trajectory graph, as below

Monitoring Year	Annual Requirement	Cumulative Requirement	Annual Projected Completions	Cumulative Projected Completions
2014/15	436	436	299	299
2015/16	436	872	173	472
2016/17	436	1308	364	836
2017/18	436	1744	516	1352
2018/19	436	2180	740	2092
2019/20	436	2616	976	3068
2020/21	436	3052	864	3932
2021/22	436	3488	777	4709
2022/23	436	3924	479	5188
2023/24	436	4360	479	5667
2024/25	436	4796	479	6146
2025/26	436	5232	479	6625
2026/27	436	5668	479	7104
2027/28	436	6104	356	7460
2028/29	436	6540	356	7816
2029/30	436	6976	356	8172
2030/31	436	7412	356	8528
2031/32	436	7848	356	8884

Housing Trajectory Table

Housing Trajectory Graph

