

Sustainability Appraisal (SA) of the Hart Local Plan

SA Report Addendum

July 2019

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	July 2019	SA Report Addendum published alongside proposed main modifications to the Hart Local Plan	Mark Fessey Associate Director	Steven Smith Technical Director	Steven Smith Technical Director

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NON-TECHNICAL SUMMARY

Introduction

Background

Hart District Council submitted the Hart Local Plan - Strategy and Sites (the plan) to the Secretary of State on 18 June 2018 for independent examination. One of the associated documents submitted alongside the plan was the Sustainability Appraisal (SA) Report.

Examination hearings were held in late 2018, overseen by a Planning Inspector. Subsequently, the Inspector wrote to the Council on 26th February 2019, confirming the need for modifications to the plan in order to make it 'sound'.

Proposed modifications are published for consultation at the current time and this SA Report Addendum is published alongside these, with a view to informing the consultation.

This SA Report Addendum

The primary aim of this SA Report Addendum is to present an appraisal of the proposed modifications that are currently being consulted upon. Additionally, there is a need to present an appraisal of the 'the plan as modified', thereby updating the appraisal findings presented within the SA Report (2018).

Appraisal findings

The task is to appraise the further proposed modifications against the established SA framework, i.e. the list of sustainability topics, objectives and issues established through 'scoping' and also discuss the plan as modified, i.e. the submission plan plus proposed modifications.

Overview of the proposed modifications

The headline proposed modification is **MM19**, which proposes two key changes to Policy SS1 (Spatial Strategy and Distribution of Growth):

- Firstly, it proposes to increase the housing requirement¹ (with the housing supply unchanged).
- Secondly, it proposes to remove the new settlement area of search from the plan (leading to a number of consequential modifications, most notably **MM32**, which deletes Policy SS3: New Settlement at the Murrell Green/Winchfield Area of Search).

However, it is a challenge to conclude with any certainty that either change leads to implications for the sustainability baseline / achievement of sustainability objectives.

Increase in the housing requirement

The proposed modifications increase the housing requirement from 388 dpa from 2016-2032 to 423 dpa from 2014-2032. This is to accommodate an unmet housing need arising in Surrey Heath (part of the same housing market area as Hart) and to better address the need for affordable housing in Hart (see Inspector's letter (EXAM 60) paragraphs 5 to 10). However, the housing supply remains unchanged. This results in a shortfall of 230 homes which arises only in the final year of the plan. The Inspector states that this would not result in the plan being found unsound, particularly as the plan would need to be reviewed within 5 years in any event (see paragraph 13 of the Inspector's letter (EXAM 60)).

In appraising this change, the first point to make is that it is only increases in supply that enable sustainability effects to be attributed with any certainty. It is much more of a challenge to conclude with certainty that increasing the housing requirement without increasing the supply leads to sustainability effects (national planning practice guidance is clear that there is a need to "*focus on what is needed to assess the likely significant effects of the Local Plan*").

¹ i.e. the number of homes to be delivered, against which performance of the plan is monitored.

The Inspector's letter (paragraph 10) states: "*Further and importantly, such an additional uplift in the housing requirement would also result in more affordable housing being delivered in Hart, which I consider to be necessary.*" However, the "additional affordable housing" (i.e. additional supply) would, it is assumed, come about as a result of a Local Plan review being triggered sooner than would have been the case under the lower requirement,² the implications of which cannot be foreseen at the current time with any certainty (N.B. the next Local Plan will be subject to its own SA process). That said, it is fair to highlight that a decision now that leads to an increased likelihood of an early plan review is both a positive from a 'housing' perspective and leads to tensions in respect of a number of community and environmental objectives.

Deletion of the new settlement AoS policy

With regards to the implications of deleting the new settlement AoS, it is very difficult to draw conclusions recognising that the submission Local Plan policy is of a procedural nature (i.e. one designed to start a process of preparing a New Settlement DPD, which might or might not ultimately lead to allocation of a new settlement). However, having said this, the SA Report comments on the new settlement AoS policy, and hence it is appropriate to consider the sustainability implications of removing the policy.

The SA Report found some support for the new settlement AoS largely on the grounds that it provided some comfort against risks such as housing and employment needs increasing. This was in the context of uncertainty over the method to be used in identifying housing needs (SHMA OAHN v standard method) and uncertainty over duty to cooperate considerations (i.e. unmet housing need in Surrey Heath). The AoS also provided a means by which a strategic new development, centred on Winchfield railway station, could be planned comprehensively for the long term, with the advantage of a critical mass to help achieve the infrastructure (including green infrastructure) necessary to support growth.

This made sense from a sustainability perspective; however, the SA Report also discussed a number of environmental concerns, not unsurprisingly given the size of the AoS and the scale of a new settlement. Concerns were raised in respect of matters including flood risk, landscape, heritage, biodiversity and agricultural land, albeit with much uncertainty in the absence of clarity over development scale and location.

Removing the AoS means that a DPD process focussed solely on the AoS cannot start once the plan is adopted. It does not remove a site allocation where there is clarity over the scale and location of development. It is therefore not possible to reach clear conclusions on sustainability implications / effects.

The AoS/DPD process will effectively be replaced by a different process, most likely a new Local Plan. That new Local Plan will be the subject of its own SA process, as part of which reasonable alternatives will be considered. The implication of removing the AoS is therefore that all reasonable options for future growth will be 'on the table'. This raises the possibility of a different outcome in the next plan, but one which is informed by an up to date appraisal of reasonable alternatives in the context of housing and other needs at that time.

Other proposed modifications

The most notable 'other' proposed modification is **MM82**, which proposes deletion of Policy NBE2 (Gaps between Settlements); however, the proposal (**MM83**) is to compensate for the deletion of this policy by adding general policy support for avoiding settlement coalescence within Policy NBE3 (Landscape). It is then open to the Council to revisit the matter of designating Gaps through the Development Management DPD, and for Gaps to be designated through Neighbourhood Plans. There will be an absence of designated Gaps in the short-term,³ but by adding a new criterion to Policy NBE3 the plan still addresses the issue but in a different way. It is worth noting that the NBE2 Gaps policy was not designed to prevent all development in Gaps - just those developments which would result in settlement coalescence and loss of separate identity, which is what the new NBE3 criterion seeks to achieve. The modification therefore has a neutral effect.

Other proposed modifications discussed within the appraisal, on the basis of having positive sustainability implications, including the following of particular note:

² The higher requirement means that the identified supply will not last quite as long in terms of maintaining a five year housing land supply.

³ Except at Odiham/North Warnborough where Gaps are designated in the adopted Neighbourhood Plan.

- **MM16** introduces the following new strategic objective: “To encourage the re-use of previously developed land.” This new objective provides a clearer message that re-using previously developed land will be encouraged. In practice, it will serve to emphasise the importance of the following key statement made at the start of Policy SS1 (Spatial Strategy and Distribution of Growth): *“Development will be focused within defined settlements, on previously developed land in sustainable locations, and on allocated sites as shown on the Policies Map.”*
- **MM52-53** (Policy H4: Specialist and Supported Accommodation) aim to make the policy more supportive of delivery. Policy H4 allows for specialist accommodation to be provided in the countryside provided certain criteria are met, one of which is that sites within settlement boundaries are considered first (a form of sequential test). The proposal is to amend the policy and supporting text so that applicants need only look at sites within settlement boundaries *where the need arises*, as opposed to the approach in the submission plan which simply refers to alternative sites within settlement boundaries (which could mean all settlements across the district).
- **MM55-56** (Policy H5: Gypsies, Travellers and Travelling Showpeople) - involves two notable changes. Firstly, the proposal is to clarify that the policy criteria apply to proposals for new sites or site extensions where the potential occupants are recognised as Gypsies and Travellers, regardless of the national definition.⁴ Secondly, there is a new commitment to *“prepare a new Gypsy and Traveller Accommodation Assessment in 2019 and, within two years of this Plan being adopted or by August 2021 (whichever is soonest), submit... a Gypsy and Traveller Development Plan Document addressing any identified needs.”*
- **MM65** (Policy ED2: Safeguarding Employment Land and Premises) - proposes new policy criteria for proposals at non-designated employment sites, offering support for regeneration and intensification for B-class uses, and clarifying that loss of an existing employment use will only be permitted where *“market signals indicate that the premises / site are unlikely to be utilised for employment use; or the site is not appropriate for the continuation of its employment use due to [environmental considerations]”*.
- **MM71 and 72** insert the following statement into Policies ED5 (Fleet Town Centre) and Policy ED6 (District and Local Centre) respectively: *“Residential use may be appropriate above retail or commercial units providing the active frontage is not compromised and that satisfactory residential amenity can be achieved”*. This change sends a more positive message about residential uses in town centres which in turn should help to ensure the continued vitality of Fleet Town Centre and District/Local Centres.
- **MM79** (Policy NBE1: Development in the Countryside) adds several new criteria to elaborate on the types of developments and uses that can be appropriate in the countryside, notably stating that development can be appropriate where it would secure the future of heritage assets. Also of note are proposed changes to the supporting text which remove reference to protecting the open nature of the countryside, protecting landscape character and preventing coalescence (MM74). This change reflects national policy and, in respect of coalescence, avoids duplication with proposed new text at Policy NBE3 (see MM84).
- **MM112** (Policy I3: Transport) - proposes to replace reference to “maximum flexibility in the choice of travel modes, including walking and cycling” with a reference to “promoting the use of sustainable transport modes prioritising walking and cycling.”

Appraisal of the submission plan plus proposed modifications

The overall conclusion reached by the SA Report (February 2018), in respect of the submission Local Plan as a whole (see Section 10.14 of the report), focused extensively on policy support for Hartland Park; however, the importance of that policy support is now more limited, because Hartland Park has outline planning permission, and the first phase has full planning permission (such that the only planning applications likely to be submitted are ‘reserved matters’ applications for latter phases). Also, whilst the SA Report (February 2018) concluded support for the new settlement AoS, the proposed modifications remove the AoS from the plan, a step that is justified in light of the Inspector’s letter to the Council of February 2019 (see discussion above on sustainability implications).

⁴ Planning Policy for Traveller Sites, DCLG, August 2015 contains at Annex 1 Glossary definitions of ‘gypsies and travellers’ and ‘travelling showpeople’ for the purposes of planning policy.

However, broadly speaking, the conclusion of the SA Report that the Local Plan leads to limited tensions with sustainability objectives holds true for the submission plan plus proposed modifications. The key point is that the Local Plan provides for objectively assessed housing needs (and as modified accommodates an unmet need in Surrey Heath, and includes an uplift for affordable housing) without making any allocations over-and-above Hartland Park (which now has planning permission). It also proposes a robust framework of thematic policies to guide planning applications (i.e. reserved matters applications at Hartland Park, applications for windfall and rural exception housing sites, potentially applications for change of use at employment sites, and other applications with less potential for strategic sustainability implications).

Next steps

The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before then reporting on the plan's legal compliance and soundness.

Assuming that the Inspector is able to find the plan (as modified) to be legally compliant and sound, it will then be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

1 INTRODUCTION

1.1 Background

1.1.1 Hart District Council submitted the Hart Local Plan – Strategy and Sites (the plan) to the Secretary of State on 18 June 2018 for independent examination. One of the associated documents submitted alongside the plan was the Sustainability Appraisal (SA) Report (February 2018).

1.1.2 Examination hearings were held in late 2018, overseen by a Planning Inspector. Subsequently, the Inspector wrote to the Council on 26th February 2019, confirming the need for modifications to the plan to render it ‘sound’.

1.1.3 Proposed main modifications are now published for consultation.

1.2 This SA Report Addendum

1.2.1 The primary aim of this SA Report Addendum is to present an appraisal of the proposed modifications, with a view to informing the current consultation.

1.2.2 Additionally, this report presents an appraisal of ‘the plan as modified’, thereby updating the appraisal findings presented within the SA Report.

1.2.3 It is important to emphasise that this is an *addendum* to the SA Report. It seeks to present information relevant to the current stage in plan-making, and does not attempt to present all of the information required of the SA Report.

Reasonable alternatives?

1.2.4 As required by Regulations,⁵ the SA Report (February 2018) presented detailed information in relation to reasonable alternatives, in that it presented an appraisal of reasonable alternatives and also “an outline of the reasons for selecting the alternatives dealt with”. More specifically, the SA Report presented an appraisal of reasonable alternative approaches to the allocation of land to deliver housing in the plan period, or ‘spatial strategy alternatives’. Further work in relation to reasonable spatial strategy alternatives was then undertaken post-submission, with a report submitted to the examination in August 2018; however, the Inspector’s letter (EXAM 60) to the Council of February 2019 (henceforth ‘the Inspector’s letter’) concludes that this report should not be relied upon in support of the plan (see paragraph 32).

1.2.5 When determining the scope of SA work necessary in support of proposed modifications there was a need to consider the possibility of once again giving formal consideration to reasonable alternatives. Considerations were as follows:

- Spatial strategy - the guidance provided by the Inspector’s letter (see paragraph 9) is that there is a need to increase the housing requirement⁶ by 41 dwellings per annum (dpa) to 423 dpa, or 7,614 homes over a plan period from 2014 to 2032 (as opposed to the period of 2016 to 2032 in the submitted plan), to address unmet housing need arising from Surrey Heath Borough⁷ and to reflect need for affordable housing in Hart. However, this did not trigger the need for further work to explore spatial strategy options involving allocation of land for housing over-and-above the submission strategy. This is because the housing land supply trajectory within the submission plan (see pg. 143) remains sufficiently robust, as explained at paras 11 to 15 of the Inspector’s letter.

⁵ The Environmental Assessment of Plans and Programmes Regulations (2004)

⁶ The housing requirement is the figure against which housing delivery will be monitored annually, for five year housing land supply and housing delivery test purposes.

⁷ As identified in the Surrey Heath Draft Local Plan Issues Options/Preferred Options, 2018 - see www.surreyheath.gov.uk/residents/planning/planning-policy/draft-local-plan-2016-2032

- New settlement AoS - in line with the recommendation at paragraph 37 of the Inspector's letter, the Council determined that retaining the AoS policy in its current form would be unsound and is therefore not a reasonable option. The Inspector has said that the policy is not needed for the plan to be found sound and he 'strongly recommends' deleting the policy to allow the plan to come forward without significant delay.

There is potentially another option that considers a new settlement policy in a different form, but the same issue arises that the policy is not needed and it would create unnecessary delays to the plan. There are therefore no reasonable alternatives to deleting the AoS policy.

- Other plan issues - a range of other issues are a focus of proposed modifications; however, all are of lesser strategic significance, relative to the spatial strategy and the matter of a new settlement AoS. No issue(s) stood out to the Council / AECOM as giving rise to a choice between alternative approaches that might be described as strategic, or which would give rise to the potential for differentiation in terms of significant effects.

1.2.6 In conclusion, in light of the above considerations, the Council (in discussion with AECOM) found there to be no reasonable alternatives warranting appraisal at the time of formulating proposed modifications, hence this report does not present an appraisal of reasonable alternatives.

2 APPRAISAL OF PROPOSED MODIFICATIONS

2.1 Introduction

2.1.1 This chapter presents an appraisal of the proposed modifications, and also discusses the 'submission plan plus proposed modifications' (thereby updating the SA Report).

2.1.2 The appraisal is structured under the 12 sustainability topics identified through SA scoping (and used to structure the appraisal findings within the SA Report).

Screening the proposed modifications

2.1.3 A number of the 151 proposed modifications can be screened-out of this appraisal on the basis that they would not lead to significant implications for the sustainability baseline / achievement of any sustainability objective. **Table 2.1** presents screening conclusions.

2.1.4 The remaining proposed modifications are screened-in as warranting appraisal, and hence are discussed within the sections below.

Table 2.1: Screening proposed modifications

Main Mod (MM)	Screening conclusion	Discussion
1-15	Out	Introductory text, including text setting out the issues to be addressed through the plan, and the Local Plan vision
16	In	New strategic objective to encourage the re-use of previously developed land
17	Out	Amendments to Policy SD1 to bring it into line with the new National Planning Policy Framework (NPPF)
18-26	These MMs deal with changes to Policy SS1 (Spatial Strategy); however, it is difficult to draw conclusions regarding sustainability implications with any certainty - see discussion in Box 2.1 .	
27-31	Out	Proposed changes to Policy SS2 (Hartland Village) to bring the policy into line with the approved hybrid planning permission. One of the changes involves removing reference to provision of older persons accommodation, which is perhaps regrettable in respect of the achievement of certain 'community' and 'housing' sustainability objectives, but cannot be identified as leading to negative effects, as it is more or less an essential change at the current time, following the decision made through the planning application process.
32	This MM deletes Policy SS3 (New Settlement at the Murrell Green/Winchfield Area of Search); however, it is difficult to conclude on sustainability implications - see discussion in Box 2.1 .	
33-51	Out	Minor amendments to housing policies
52-53	In	Amendments to Policy H4: Specialist and Supported Accommodation
54	Out	Consequential to removal of Policy SS3
55-56	In	Amendments to Policy H5 (Gypsies, Travellers and Travelling Showpeople)
57-59	Out	Minor amendments to housing policies
60-63	Out	Minor amendments to employment policies
64	In	Amends the designation of Bartley Wood employment.
65	In	Amendment to Policy ED2 (Safeguarding Employment Land and Premises)
66-69	Out	Minor amendments to Policy ED2 and also Policy ED3 (the Rural Economy)
70	Out	Minor amendments to town centre policies
71-72	In	Amend Policies ED5 (Fleet Town Centre) and ED6 (District and Local Centre)
73	Out	Minor amendments to supporting text in respect of Policy NBE1 (Development in the Countryside)
74	In	Amends Policy NBE1
75-78	Out	Minor amendments to Policy NBE1
79	In	Amends Policy NBE1
80-81	Out	Minor amendments to Policy NBE1 supporting text
82-84	In	Deletion of Policy NBE2 (Gaps between Settlements) and consequent change to Policy NBE3 (Landscape)
85-87	Out	Minor amendments to Policy NBE4 (Thames Basin Heaths Special Protection Area), relating to the required Habitats Regulations Assessment (HRA) process in light of the 'Sweetman ruling' of the European Court of Justice.

Main Mod (MM)	Screening conclusion	Discussion
88-99	Out	Minor amendments to Natural and Built Environment (NBE) policies
100	In	Amends Policy NBE12 (Pollution)
101-109	Out	Minor amendments to Policy I1 (Infrastructure), which deal with process
110-111	Out	Minor amendments to Policy I2 (Green Infrastructure)
112	In	Amendment to Policy I3 (Transport)
113	Out	Minor amendment to Policy I3 (Transport)
114-117	Out	Minor amendment to Policy I4 (Open Space, Sport and Recreation)
118-120	Out	Minor amendment to Policy I5 (Community Facilities) and I6 (Broadband or Successor Services)
121	Out	Explanatory text, not a policy
122-136	Out	Amendment to the monitoring framework - see Section 3 of this report
137-140	Out	Updates to the glossary
141-148	Out	Updates to housing supply figures/trajectory
149-150	Out	Updates to list of strategic policies for NP purposes consequential to deletion of SS3 and NBE2
151	Out	Update to appendix of saved policies to be superseded

Box 2.1: Discussion of MM19 and MM32 (Increase in housing requirement and deletion of AoS)

The headline proposed modification is **MM19**, which proposes two key changes to Policy SS1 (Spatial Strategy and Distribution of Growth). Firstly, it proposes to increase the housing requirement⁸ (with the housing supply unchanged). Secondly, it proposes to remove the new settlement area of search from the plan (leading to a number of consequential modifications, most notably **MM32**, which deletes Policy SS3: New Settlement at the Murrell Green/Winchfield Area of Search).

However, it is a challenge to conclude with any certainty that either change leads to implications for the sustainability baseline / achievement of sustainability objectives.

Increase in the housing requirement

The proposed modifications increase the housing requirement from 388 dpa from 2016-2032 to 423 dpa from 2014-2032. This is to accommodate an unmet housing need arising in Surrey Heath (part of the same housing market area as Hart) and to better address the need for affordable housing in Hart (see Inspector's letter paragraphs 5 to 10). However, the housing supply remains unchanged. This results in a shortfall of 230 homes which arises only in the final year of the plan. The Inspector states that this would not result in the plan being found unsound, particularly as the plan would need to be reviewed within 5 years in any event (see paragraph 13 of the Inspector's letter).

In appraising this change, the first point to make is that it is only increases in supply that enable sustainability effects to be attributed with any certainty. It is more challenging to conclude with certainty that increasing the housing requirement without increasing the supply leads to effects (national planning practice guidance is clear that there is a need to "*focus on what is needed to assess the likely significant effects of the Local Plan*").

The Inspector's letter (paragraph 10) states: "*Further and importantly, such an additional uplift in the housing requirement would also result in more affordable housing being delivered in Hart, which I consider to be necessary.*" However, the "additional affordable housing" (i.e. additional supply) would, it is assumed, come about as a result of a Local Plan review being triggered sooner than would have been the case under the lower requirement,⁹ the implications of which cannot be foreseen at the current time with any certainty (N.B. the next Local Plan will be subject to its own SA process). That said, it is fair to highlight that a decision now that leads to an increased likelihood of an early plan review is both a positive from a 'housing' perspective and leads to tensions in respect of a number of community and environmental objectives.

Deletion of the new settlement AoS policy

With regards to the implications of deleting the new settlement AoS, it is very difficult to draw conclusions recognising that the submission Local Plan policy is of a procedural nature (i.e. one designed to start a process of preparing a New Settlement DPD, which might or might not ultimately lead to allocation of a new settlement). However, having said this, the SA Report comments on the new settlement AoS policy, and hence it is appropriate to consider the sustainability implications of removing the policy.

The SA Report found some support for the new settlement AoS largely on the grounds that it provided some comfort against risks such as housing and employment needs increasing. This was in the context of uncertainty over the method to be used in identifying housing needs (SHMA OAHN v standard method) and uncertainty over duty to cooperate considerations (i.e. unmet housing need in Surrey Heath). The AoS also provided a means by which a strategic new development, centred on Winchfield railway station, could be planned comprehensively for the long term, with the advantage of a critical mass to help achieve the infrastructure (including green infrastructure) necessary to support growth.

This made sense from a sustainability perspective; however, the SA Report also discussed a number of environmental concerns, not unsurprisingly given the size of the AoS and the scale of a new settlement. Concerns were raised in respect of matters including flood risk, landscape, heritage, biodiversity and agricultural land, albeit with much uncertainty in the absence of clarity over development scale and location.

Removing the AoS means that a DPD process focused solely on the AoS cannot start once the plan is adopted. It does not remove a site allocation where there is clarity over the scale and location of development. It is therefore not possible to reach clear conclusions on sustainability implications / effects.

The AoS/DPD process will effectively be replaced by a different process, most likely a Local Plan review. When the Local Plan is reviewed it will be the subject of its own SA process, as part of which reasonable alternatives will be considered. The implication of removing the AoS is therefore that all reasonable options for future growth will be 'on the table'. This raises the possibility of a different outcome in the next plan, but one which is informed by an up to date appraisal of reasonable alternatives in the context of housing and other needs at that time.

⁸ i.e. the number of homes to be delivered, against which performance of the plan is monitored.

⁹ The higher requirement means that the identified supply will not last quite as long in terms of maintaining a five year housing land supply.

2.2 Accessibility

Sustainability objectives are to: Protect and enhance the **health** and well-being of the population; Encourage increased engagement in cultural activity, **leisure, and recreation** across all sections of the community; Improve **accessibility** to all services and facilities; Maintain and improve opportunities for everyone to acquire the **education and skills** they need to find and remain in work.

Appraisal of the proposed modifications

2.2.1 None of the screened-in proposed modifications have implications for Accessibility.

Appraisal of the submission plan plus proposed modifications

2.2.2 The SA Report (2018) concluded:

“The proposed spatial strategy performs well, in that Hartland Park will involve delivery of new community infrastructure, thereby helping to ensure that housing growth does not put undue strain on existing community infrastructure. The recently approved (subject to a legal agreement) hybrid application for the site proposes 1.6 ha for a primary school, 1ha for a local centre and almost 12 ha of open/amenity space (the total site area being 55ha).”

The commitment to plan for a new settlement, through a separate DPD, is also strongly supported, as this will ensure that opportunities for delivering a new secondary school, and other community infrastructure, are fully realised.

The proposed development management policy framework is robust and helps to alleviate concerns, with Policies I8 (Safeguarded land for Education) and I4 (open space, sport and recreation) of particular note.

*Whilst the plan performs well, **significant positive effects are not predicted**, recognising that there are no existing strategic problems/issues set to be addressed as a result of the plan. Much hinges on delivery of a new secondary school through a future new settlement.”*

2.2.3 There is a need to revisit this conclusion in two respects. Firstly, Hartland Park has outline planning permission, and early phases have full planning permission, such that Local Plan policies will have limited effect, as they are only likely to apply to the planning applications remaining to be submitted for ‘reserved matters’. Secondly, the new settlement AoS has been removed from the plan. In respect of the proposed new secondary school that was envisaged with the new settlement, the Local Education Authority is not reliant on it to meet the levels of growth set out in the plan (needs can be met at existing schools expanded where necessary).

2.2.4 Overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’.

2.3 Biodiversity

Sustainability objective: Protect and enhance **biodiversity**.

Appraisal of the proposed modifications

2.3.1 None of the screened-in proposed modifications have implications for biodiversity.

Appraisal of the submission plan plus proposed modifications

2.3.2 The SA Report (2018) concluded:

“On balance, it is fair to conclude that the proposed spatial strategy performs well. At Hartland Park there is good potential to take a strategic approach to biodiversity mitigation, albeit this does involve some relocation of SINC habitat (this has been successful in the past, which helps to allay any concerns). There remains a degree of uncertainty regarding impacts to the TBHSPA and Fleet Pond SSSI at this stage, with careful monitoring necessary (and committed to, in the form of a detailed management plan and monitoring programme).

The commitment to planning for a new settlement, through preparation of a separate DPD, is quite strongly supported, as the Murrell Green/Winchfield area is less sensitive than other areas to the north/east (albeit still within the 5km TBHSPA buffer), and there is very good opportunity to deliver effective new strategic SANG.

The proposed development management policy framework is robust and helps to alleviate concerns, although there could be potential to strengthen site specific policy for Hartland Park.”

*In conclusion, whilst there are significant biodiversity sensitivities (TBHSPA, SSSIs and locally important habitats) within proximity to proposed areas of growth, there is confidence in the ability to deliver effective avoidance / mitigation measures. **Significant negative effects are not predicted.***

2.3.3 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission, and the concern raised regarding impacts to the TBHSPA and Fleet Pond SSSI no longer stand, given the planning permission. Secondly, the new settlement AoS has been removed from the plan.

2.3.4 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’. The key point to note is that the Local Plan does not propose any allocations (over-and-above Hartland Park, which has planning permission).

2.4 Climate change mitigation

SA objectives: Reduce the **emissions of greenhouse gases** and manage the impacts of climate change; Increase **energy** efficiency, security and diversity of supply and the proportion of energy generated from renewable sources.

Appraisal of the proposed modifications

2.4.1 The only screened-in proposed modification with implications for climate change mitigation is **MM112** (Policy I3: Transport) - proposes to replace reference to “maximum flexibility in the choice of travel modes, including walking and cycling” with a reference to “promoting the use of sustainable transport modes prioritising walking and cycling.”

Appraisal of the submission plan plus proposed modifications

2.4.2 The SA Report (2018) concluded:

“There is support for the decision to allocate a single large brownfield site (Hartland Park), as there will be economies of scale achieved that should lead to good potential to design-in measures to minimise per capita CO₂ emissions from the built environment; however, current proposals (as understood from the current planning application) perhaps lack ambition, and the proposed site specific policy does not deal with this matter.

The commitment to planning for a new settlement, through preparation of a separate DPD, is also strongly supported, as this will help to realise opportunities for delivering decentralised renewable or low carbon heat and/or electricity generation.

The proposed development management policy framework is fairly robust, albeit support for low carbon measures is caveated, i.e. numerous other competing factors are highlighted as potentially overriding.

*Whilst the plan performs well, although **significant positive effects are not predicted**, recognising that climate change mitigation is a global issue.”*

- 2.4.3 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan (N.B. the SA Report conclusion might also have made reference to arguments in respect of minimising per capita greenhouse gas emissions from transport).
- 2.4.4 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’.

2.5 Communities

SA objectives: Reduce **inequality**, poverty and social exclusion; SA5 Improve community **safety** by reducing crime and the fear of crime; Create and sustain vibrant and locally distinctive settlements and **communities**; Stimulate **regeneration** where appropriate and encourage urban renaissance. N.B. the objectives listed above, under ‘Accessibility’ are also relevant here, i.e. there is cross-over.

Appraisal of the proposed modifications

- 2.5.1 None of the screened-in proposed modifications have implications for ‘communities’ objectives (although see discussion below, under ‘housing’).

Appraisal of the submission plan plus proposed modifications

- 2.5.2 The SA Report (2018) concluded:
- “The proposal to allocate a new community at Hartland Park potentially gives rise to certain environmental health, and safety considerations, reflecting the fact that this is something of an unusual site (past industrial uses, surrounded by woodland and MOD land). However, detailed work has been undertaken to demonstrate that issues can be overcome, and a robust policy framework is proposed, such that concerns are alleviated. Of particular note are policies NBE10 (Design), I3 (Transport) and NBE12 (pollution). The plan broadly performs well, although **significant positive effects are not predicted**.”*
- 2.5.3 There is a need to revisit this conclusion on the basis that Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’. It remains the case that there is no basis upon which to conclude that positive effects resulting from the plan will be *significant*.

2.6 Employment and the economy

SA objectives: Maintain high and stable levels of **employment** and promote **sustainable economic growth** and competitiveness.

Appraisal of the proposed modifications

- 2.6.1 Firstly, **MM64** (Policy ED2: Safeguarding Employment Land and Premises) designates Bartley Wood, Hook, as a Locally Important Employment Site rather than a Strategic Employment Site. This change, which reduces the degree of protection, is reflective of the role and function of the site; however proposals for non-employment uses will still need to pass strong policy tests. The 'employment and economy' implications of this modification are therefore neutral.
- 2.6.2 Secondly, **MM65** (Policy ED2: Safeguarding Employment Land and Premises), which proposes new policy criteria for proposals at non-designated employment sites, offering support for regeneration and intensification for B-class uses, and clarifying that loss of an existing employment use will only be permitted where *"market signals indicate that the premises / site are unlikely to be utilised for employment use; or the site is not appropriate for the continuation of its employment use due to [environmental considerations]"*.
- 2.6.3 Thirdly, **MM71 and 72** insert the following statement into Policies ED5 (Fleet Town Centre) and Policy ED6 (District and Local Centre) respectively: *"Residential use may be appropriate above retail or commercial units providing the active frontage is not compromised and that satisfactory residential amenity can be achieved"*. This change sends a more positive message about residential uses in town centres which in turn should help to ensure the continued vitality of Fleet Town Centre and District/Local Centres.

Appraisal of the submission plan plus proposed modifications

- 2.6.4 The SA Report (2018) concluded:

"The emphasis is on protecting existing employment sites, encouraging their optimum use, and also facilitating the rural economy. This approach is broadly in accordance with the findings of the 2016 ELR, albeit supply of industrial and warehousing land will be 'tight'. Comfort is provided by the proposal to deliver a new settlement in the Murrell Green/Winchfield Area in the long term, given the potential to deliver significant new employment land.

The proposed policy framework is also supported, given a clear focus on protecting existing employment sites from change of use (with sites of strategic importance given greatest protection), and also maintaining the existing hierarchy of town, district and local centre. Policy NBE1 (Development in the Countryside) is also supported, given the importance of maintaining of new development, and changes of use, to supporting a vibrant rural economy.

*In conclusion, effects are somewhat mixed, with **significant effects not predicted**. There may be a need to monitor the employment land supply/demand position, particularly in respect of warehousing and industrial uses."*

- 2.6.5 This conclusion **broadly holds true** for 'the submission plan plus proposed modifications'. The proposed modifications include a notable degree of additional support for safeguarding existing employment sites, and there is also a new measure proposed in support of town/district/local centre vitality; however, it remains the case that there is no basis upon which to conclude that positive effects resulting from the plan will be *significant*.

2.7 Flood risk and other climate change adaptation issues

SA objectives: Reduce the emissions of greenhouse gases and manage the **impacts of climate change**; Reduce the risk of **flooding** and the resulting detriment to the local community, environment and economy.

Appraisal of the proposed modifications

2.7.1 None of the screened-in proposed modifications have implications for 'flood risk and other climate change adaptation' objectives.

Appraisal of the submission plan plus proposed modifications

2.7.2 The SA Report (2018) concluded:

*"The proposed spatial strategy performs well, with the proposal to focus growth at Hartland Park supported, given that this site is largely unconstrained in respect of flood risk. The commitment to planning for a new settlement, through preparation of a separate DPD, gives rise some concerns, given there are some flood risk constraints; however, there is confidence in the ability to masterplan a new settlement that avoids, or addresses, these constraints. In conclusion, the plan performs well, although **significant positive effects are not predicted.**"*

2.7.3 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan.

2.7.4 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for 'the submission plan plus proposed modifications'.

2.8 Historic environment

SA7 Protect and enhance the District's **historic environment**.

Appraisal of the proposed modifications

2.8.1 None of the screened-in proposed modifications have implications for historic environment objectives.

Appraisal of the submission plan plus proposed modifications

2.8.2 The SA Report (2018) concluded:

"The proposed spatial strategy performs well, with the proposal to focus growth at Hartland Park supported, given that this site is largely unconstrained in respect of heritage.

The commitment to planning for a new settlement, through preparation of a separate Development Plan, gives rise to some issues/concerns, given some notable constraints (listed buildings and a conservation area, and more generally a rural landscape with historic character); however, there is confidence in the ability to masterplan a new settlement that avoids/mitigates impacts. A robust development management policy framework is proposed which should help to ensure that this is the case.

*In conclusion, the Proposed Submission Plan performs well, although **significant positive effects are not predicted.**"*

- 2.8.3 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan.
- 2.8.4 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’.

2.9 Housing

SA objective: Provide all residents with the opportunity to live in a decent **home** which meets their needs.

Appraisal of the proposed modifications

- 2.9.1 Firstly, there is a need to note MM19, which proposes to increase the housing requirement and delete the AoS. The implications of this proposed modification are discussed above, within Box 2.1.
- 2.9.2 Secondly, **MM52-53** (Policy H4: Specialist and Supported Accommodation) aim to make the policy more supportive of delivery. Policy H4 allows for specialist accommodation to be provided in the countryside provided certain criteria are met, one of which is that sites within settlement boundaries are considered first (a form of sequential test). The proposal is to amend the policy and supporting text so that applicants need only look at sites within settlement boundaries *where the need arises*, as opposed to the approach in the submission plan which simply refers to alternative sites within settlement boundaries (which could mean all settlements across the district).
- 2.9.3 Thirdly, **MM55-56** (Policy H5: Gypsies, Travellers and Travelling Showpeople) propose two notable changes. Firstly, the proposal is to clarify that the policy criteria apply to proposals for new sites or site extensions where the potential occupants are recognised as Gypsies and Travellers, regardless of the national definition.¹⁰ Secondly, there is a new commitment to “prepare a new Gypsy and Traveller Accommodation Assessment in 2019 and, within two years of this Plan being adopted or by August 2021 (whichever is soonest), submit... a Gypsy and Traveller Development Plan Document addressing any identified needs.”

Appraisal of the submission plan plus proposed modifications

- 2.9.4 The SA Report (2018) concluded:

*“The plan will lead to **significant positive effects**, in light of the proposal to provide for local housing need (as currently understood), and indeed potentially provide for a quantum of homes above local housing need. The proposal to focus growth at Hartland Park is potentially associated with a degree of risk, given that it is a large brownfield site that could prove challenging to deliver, with implications for the number of affordable homes that can be delivered, and potentially also the timing of delivery. However, the planning application indicates that the vast majority of the site will be delivered within the plan period. Furthermore this single allocation needs to be seen in the context of the array of other sites all around the District with planning permission, and which will contribute to supply over the plan period.*

Finally, there is strong support for the proposal to plan for a new settlement in the long term, and there is also strong support for the proposed framework of development management policies, which should serve to ensure that the full range of housing needs are met. The policy on rural exception sites helps to alleviate concerns regarding the lack of any proposed allocations within the rural area, and the policy on specialist accommodation helps to alleviate concerns regarding the removal of the Cross Farm site, which was included in the 2017 Draft Plan.”

¹⁰ Planning Policy for Traveller Sites, DCLG, August 2015 contains at Annex 1 Glossary definitions of ‘gypsies and travellers’ and ‘travelling showpeople’ for the purposes of planning policy.

2.9.5 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan.

N.B. as discussed elsewhere, the Policy was for a DPD process and not a site allocation. The assumption now is that future growth needs will be planned for through future plans, in the usual way, with no detriment to housing supply.

2.9.6 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for 'the submission plan plus proposed modifications'. Most importantly, there is confidence in the robustness of the Local Plan housing trajectory, in light of the new housing requirement. Also, the proposed detailed changes to Policies H4 and H5 are supported.

2.10 Land and other resources

SA objectives: Maintain and improve **soil** quality; Promote the efficient **use of land** through the appropriate re-use of previously developed land; Improve the efficiency of **resource use** and achieve sustainable resource management.

Appraisal of the proposed modifications

2.10.1 **MM16** introduces the following new strategic objective: "To encourage the re-use of previously developed land." This new objective provides a clearer message that re-using previously developed land will be encouraged. In practice, it will serve to emphasise the importance of the following key statement made at the start of Policy SS1 (Spatial Strategy and Distribution of Growth): "*Development will be focused within defined settlements, on previously developed land in sustainable locations, and on allocated sites as shown on the Policies Map.*"

2.10.2 Also, following on from the above, **MM136** proposes a new monitoring indicator relating to previously developed land. Specifically, the proposal is to monitor: "*The amount of development granted permission and completed on previously developed land.*" More specifically, the process will involve monitoring "*the uptake of sites on the brownfield register (completions and permissions)*".

2.10.3 Finally, **MM100** introduces 'cumulative effects' into criterion (a) of Policy NBE12 (Pollution). Criterion (a) prevents development that would give rise to, or would be subject to, unacceptable levels of pollution. Introducing 'cumulative effects' increases the stringency of the policy with clear benefits. As explained within the supporting text, pollution means "*anything that affects the quality of land, air, water or soils which might lead to an adverse impact on human health, the natural environment or general amenity.*"

Appraisal of the submission plan plus proposed modifications

2.10.4 The SA Report (2018) concluded:

*"The plan will lead to **significant positive effects**, in light of the proposal to focus growth at Hartland Park. The proposal to plan strategically for a new settlement in the Murrell Green/Winchfield Area is also supported, as this will enable time for detailed agricultural land surveys to be completed, and considered as a key element of the evidence-base; however, it seems likely that significant loss of best and most versatile agricultural land will be inevitable."*

2.10.5 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan (N.B. a new settlement within the AoS would likely result in significant loss of best and most versatile agricultural land).

- 2.10.6 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’. The Local Plan does not propose any allocations over-and-above Hartland Park (which has planning permission), and hence is supported from a ‘land and other resources’ perspective. Furthermore, the added emphasis on previously developed land through the new Local Plan objective is supported.

2.11 Landscape

SA objective: Protect and enhance the District’s **countryside** and rural landscape.

Appraisal of the proposed modifications

- 2.11.1 The most notable ‘other’ proposed modification is **MM82**, which proposes deletion of Policy NBE2 (Gaps between Settlements); however, the proposal (**MM83**) is to compensate for the deletion of this policy by adding general policy support for avoiding settlement coalescence within Policy NBE3 (Landscape). It is then open to the Council to revisit the matter of designating Gaps through the Development Management DPD, and for Gaps to be designated through Neighbourhood Plans. There will be an absence of designated Gaps in the short-term,¹¹ but by adding a new criterion to Policy NBE3 the plan still addresses the issue but in a different way. It is worth noting that the NBE2 Gaps policy was not designed to prevent all development in Gaps - just those developments which would result in settlement coalescence and loss of separate identity, which is what the new NBE3 criterion seeks to achieve. The modification therefore has a neutral effect.
- 2.11.2 The only other screened-in proposed modification with implications for landscape objectives is **MM79** (Policy NBE1: Development in the Countryside), which adds several new criteria to elaborate on the types of developments and uses that can be appropriate in the countryside, notably stating that development can be appropriate where it would secure the future of heritage assets. Also of note are proposed changes to the supporting text which remove reference to protecting the open nature of the countryside, protecting landscape character and preventing coalescence (MM74). This change reflects national policy and, in respect of coalescence, avoids duplication with proposed new text at Policy NBE3 (see MM84).

Appraisal of the submission plan plus proposed modifications

- 2.11.3 The SA Report (2018) concluded:

“The proposed spatial strategy performs well, with the proposal to focus growth at Hartland Park supported, given that this is a brownfield site (albeit nonetheless a site with landscape sensitivities to be addressed through future detailed planning applications).

The commitment to planning for a new settlement, through preparation of a separate DPD, gives rise to some landscape issues/concerns; however, there is confidence in the ability to masterplan a new settlement that avoids/mitigates these constraints. A robust development management policy framework is proposed which should help to ensure that this is the case.

*In conclusion, the plan performs well, but **significant positive effects are not predicted.**”*

- 2.11.4 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan.
- 2.11.5 However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’.

¹¹ Except at Odiham/North Warnborough where Gaps are designated in the adopted Neighbourhood Plan.

2.12 Transport

SA objectives: Improve **accessibility** to all services and facilities; Improve efficiency of **transport** networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Appraisal of the proposed modifications

- 2.12.1 The only screened-in proposed modification with implications for transport objectives is **MM112** (Policy I3: Transport), which proposes to replace reference to “*maximum flexibility in the choice of travel modes, including walking and cycling*” with a reference to “*promoting the use of sustainable transport modes prioritising walking and cycling.*”

Appraisal of the submission plan plus proposed modifications

- 2.12.2 The SA Report (2018) concluded:

“The proposed spatial strategy performs well, with the proposal to focus growth at Hartland Park supported, given that this site is relatively well located from a transport perspective, and there is the potential to deliver significant upgrades to transport infrastructure.

The commitment to planning for a new settlement, through preparation of a separate DPD, gives rise to some transport issues/concerns; which will require further detailed examination. A robust development management policy framework is proposed which should help to ensure that this is the case.

*In conclusion, the plan performs well, but **significant positive effects are not predicted.**”*

- 2.12.3 There is a need to revisit this conclusion in two respects. Firstly, as discussed above, Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. Secondly, the new settlement AoS has been removed from the plan (N.B. the SA Report conclusion might additionally have made reference to the rail station within the AoS). However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’.

2.13 Water

SA10 Maintain and improve the water quality of **rivers and groundwaters** and other water bodies.

Appraisal of the proposed modifications

- 2.13.1 The only screened-in proposed modification with implications for water objectives is **MM100**, which introduces ‘cumulative effects’ into criterion (a) Policy NBE12 (Pollution). Criterion (a) prevents development that would give rise to, or would be subject to, unacceptable levels of pollution. Introducing ‘cumulative effects’ increases the stringency of the policy with clear benefits. As explained within the supporting text, pollution means “*anything that affects the quality of land, air, water or soils which might lead to an adverse impact on human health, the natural environment or general amenity.*”

Appraisal of the submission plan plus proposed modifications

- 2.13.2 The SA Report (2018) concluded:

“There is understood to be some capacity issues associated with Camberley Wastewater Treatment Works, and so it will be important to ensure that this does not have an unforeseen impact on delivery of the proposed Hartland Park allocation. In other respects, the proposed spatial strategy performs well, and a robust policy framework is proposed. In particular, it is noted that the Proposed Submission Plan responds to the Council’s WCS through Policy NBE8, which requires that a high standard of water efficiency is achieved by development.

*In conclusion, one issue has been highlighted; however, **significant negative effects are not predicted** on the basis that developers will work with the Environment Agency and Thames Water to ensure delivery of timely infrastructure upgrades.”*

- 2.13.3 There is a need to revisit this conclusion as Hartland Park policies are now likely to have limited bearing, given the hybrid planning permission. However, the overall headline conclusion reported in the SA Report nonetheless **broadly holds true** for ‘the submission plan plus proposed modifications’.

2.14 Conclusions

Appraisal of the proposed modifications

- 2.14.1 The headline proposed modification is **MM19**, which proposes two key changes to Policy SS1 (Spatial Strategy and Distribution of Growth):
- Firstly, it proposes to increase the housing requirement¹² (with the housing supply unchanged).
 - Secondly, it proposes to remove the new settlement area of search from the plan (leading to a number of consequential modifications, most notably **MM32**, which deletes Policy SS3: New Settlement at the Murrell Green/Winchfield Area of Search).
- 2.14.2 However, it is a challenge to conclude with any certainty that either change leads to implications for the sustainability baseline / achievement of sustainability objectives (see discussion above, within Box 2.1)
- 2.14.3 The most notable ‘other’ proposed modification is **MM82**, which proposes deletion of Policy NBE2 (Gaps between Settlements); however, the proposal (**MM83**) is to compensate for the deletion of this policy by adding general policy support for avoiding settlement coalescence within Policy NBE3 (Landscape). It is then open to the Council to revisit the matter of designating Gaps through the Development Management DPD, and for Gaps to be designated through Neighbourhood Plans. There will be an absence of designated Gaps in the short-term,¹³ but by adding a new criterion to Policy NBE3 the plan still addresses the issue but in a different way. It is worth noting that the NBE2 Gaps policy was not designed to prevent all development in Gaps - just those developments which would result in settlement coalescence and loss of separate identity, which is what the new NBE3 criterion seeks to achieve. The modification therefore has a neutral effect.
- 2.14.4 Other proposed modifications discussed within the appraisal, on the basis of having positive sustainability implications, including the following of particular note:
- **MM16** introduces the following new strategic objective: “To encourage the re-use of previously developed land.” This new objective provides a clearer message that re-using previously developed land will be encouraged. In practice, it will serve to emphasise the importance of the following key statement made at the start of Policy SS1 (Spatial Strategy and Distribution of Growth): “*Development will be focused within defined settlements, on previously developed land in sustainable locations, and on allocated sites as shown on the Policies Map.*”
 - **MM52-53** (Policy H4: Specialist and Supported Accommodation) aim to make the policy more supportive of delivery. Policy H4 allows for specialist accommodation to be provided in the countryside provided certain criteria are met, one of which is that sites within settlement boundaries are considered first (a form of sequential test). The proposal is to amend the policy and supporting text so that applicants need only look at sites within settlement boundaries *where the need arises*, as opposed to the approach in the submission plan which simply refers to alternative sites within settlement boundaries (which could mean all settlements across the district).

¹² i.e. the number of homes to be delivered, against which performance of the plan is monitored.

¹³ Except at Odiham/North Warnborough where Gaps are designated in the adopted Neighbourhood Plan.

- **MM55-56** (Policy H5: Gypsies, Travellers and Travelling Showpeople) - involves two notable changes. Firstly, the proposal is to clarify that the policy criteria apply to proposals for new sites or site extensions where the potential occupants are recognised as Gypsies and Travellers, regardless of the national definition.¹⁴ Secondly, there is a new commitment to *“prepare a new Gypsy and Traveller Accommodation Assessment in 2019 and, within two years of this Plan being adopted or by August 2021 (whichever is soonest), submit... a Gypsy and Traveller Development Plan Document addressing any identified needs.”*
- **MM65** (Policy ED2: Safeguarding Employment Land and Premises) - proposes new policy criteria for proposals at non-designated employment sites, offering support for regeneration and intensification for B-class uses, and clarifying that loss of an existing employment use will only be permitted where *“market signals indicate that the premises / site are unlikely to be utilised for employment use; or the site is not appropriate for the continuation of its employment use due to [environmental considerations]”*.
- **MM71 and 72** insert the following statement into Policies ED5 (Fleet Town Centre) and Policy ED6 (District and Local Centre) respectively: *“Residential use may be appropriate above retail or commercial units providing the active frontage is not compromised and that satisfactory residential amenity can be achieved”*. This change sends a more positive message about residential uses in town centres which in turn should help to ensure the continued vitality of Fleet Town Centre and District/Local Centres.
- **MM79** (Policy NBE1: Development in the Countryside) adds several new criteria to elaborate on the types of developments and uses that can be appropriate in the countryside, notably stating that development can be appropriate where it would secure the future of heritage assets. Also of note are proposed changes to the supporting text which remove reference to protecting the open nature of the countryside, protecting landscape character and preventing coalescence (MM74). This change reflects national policy and, in respect of coalescence, avoids duplication with proposed new text at Policy NBE3 (see MM84).
- **MM112** (Policy I3: Transport) - proposes to replace reference to “maximum flexibility in the choice of travel modes, including walking and cycling” with a reference to “promoting the use of sustainable transport modes prioritising walking and cycling.”

Appraisal of the submission plan plus proposed modifications

- 2.14.5 The overall conclusion reached by the SA Report (February 2018), in respect of the submission Local Plan as a whole (see Section 10.14 of the report), focused extensively on policy support for Hartland Park; however, the importance of that policy support is now more limited, because Hartland Park has outline planning permission, and the first phase has full planning permission (such that the only planning applications likely to be submitted are ‘reserved matters’ applications for latter phases). Also, whilst the SA Report (February 2018) concluded support for the new settlement AoS, the proposed modifications remove the AoS from the plan, a step that is justified in light of the Inspector’s letter to the Council of February 2019 (see discussion of sustainability implications within Box 2.1).
- 2.14.6 However, broadly speaking, the conclusion of the SA Report that the Local Plan leads to limited tensions with sustainability objectives holds true for the submission plan plus proposed modifications. The key point is that the Local Plan provides for objectively assessed housing needs (and as modified accommodates an unmet need in Surrey Heath, and includes an uplift for affordable housing) without making any allocations over-and-above Hartland Park, (which now has planning permission). It also proposes a robust framework of thematic policies to guide planning applications (i.e. reserved matters applications at Hartland Park, applications for windfall and rural exception housing sites, potentially applications for change of use at employment sites, and other applications with less potential for strategic sustainability implications).

¹⁴ Planning Policy for Traveller Sites, DCLG, August 2015 contains at Annex 1 Glossary definitions of ‘gypsies and travellers’ and ‘travelling showpeople’ for the purposes of planning policy.

3 NEXT STEPS

- 3.1.1 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before reporting on the plan's legal compliance and soundness.
- 3.1.2 Assuming that the Inspector is able to find the plan (as modified) to be legally compliant and sound, it will then be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

Monitoring

- 3.1.3 At the current time, there is a need to present 'measures envisaged concerning monitoring'.

- 3.1.4 With regards to monitoring, the SA Report stated:

The... key proposal relates to triggers for a Local Plan Review. This focus on monitoring of housing delivery, in light of changing understanding of housing needs, is appropriate. Other proposed indicators presented within the monitoring framework are also strongly supported, in light of the appraisal presented above (Chapter 10): Net affordable housing completions at Hartland Village; Provision of social and community infrastructure at Hartland Village; Delivery of educational facilities at the new settlement; Delivery of green infrastructure provision at Hartland Village; Quality and area of SINC. A focus of monitoring delivery at Hartland Park is supported; however, there might be the potential to go further, e.g. through specific monitoring targeted at ensuring no 'net loss' of biodiversity, potentially to include specific monitoring of the planned translocation and management of the on-site SINC.

- 3.1.5 At the current time, MM136 proposes a new monitoring indicator relating to the amount of development granted permission and completed on previously developed land. Additionally, the proposed modifications potentially suggest a need to monitor current and projected secondary school capacity especially closely, working with the Local Education Authority under the duty to cooperate.