Sustainability Appraisal (SA) of the Hart Local Plan

SA Report
Non-technical Summary

February 2018
Limitations

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**Introduction**

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Hart Local Plan: Strategy and Sites. Once adopted, the plan will allocate land for development and set policies to guide decisions on development and changes in how land is used.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, the ‘proposed submission’ version of the plan is published under Regulation 19 of the Local Planning Regulations, and the ‘SA Report’ is published alongside, in accordance with regulatory requirements. The SA Report aims to inform the consultation, and subsequent plan-making work.

This is a Non-technical Summary (NTS) of the SA Report.

**Structure of the SA Report / this NTS**

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
   - i.e. when preparing the draft plan.

2. What are the appraisal findings at this current stage?
   - i.e. in relation to the draft plan.

3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question ‘What’s the scope of the SA?’

**What’s the scope of the SA?**

The scope of the SA is essentially reflected in a list of sustainability topics and objectives. Taken together, this list indicates the parameters of SA, and provides a methodological ‘framework’ for appraisal.

**Sustainability topics and objectives (the SA framework)**

<table>
<thead>
<tr>
<th>Topic</th>
<th>Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>1   Accessibility</td>
<td>SA2 Protect and enhance the <strong>health</strong> and well-being of the population; SA3 Encourage increased engagement in cultural activity, <strong>leisure, and recreation</strong> across all sections of the community; SA17 Improve <strong>accessibility</strong> to all services and facilities; SA19 Maintain and improve opportunities for everyone to acquire the <strong>education and skills</strong> they need to find and remain in work.</td>
</tr>
<tr>
<td>2   Biodiversity</td>
<td>SA8 Protect and enhance <strong>biodiversity</strong>.</td>
</tr>
<tr>
<td>3   Climate change mitigation</td>
<td>SA12 Reduce the <strong>emissions of greenhouse gases</strong> and manage the impacts of climate change; SA14 Increase <strong>energy</strong> efficiency, security and diversity of supply and the proportion of energy generated from renewable sources.</td>
</tr>
<tr>
<td>4   Communities</td>
<td>SA4 Reduce <strong>inequality</strong>, poverty and social exclusion; SA5 Improve community <strong>safety</strong> by reducing crime and the fear of crime; SA6 Create and sustain vibrant and locally distinctive settlements and <strong>communities</strong>; SA21 Stimulate <strong>regeneration</strong> where appropriate and encourage urban renaissance. N.B. the objectives listed above, under ‘Accessibility’ are also relevant here, i.e. there is cross-over.</td>
</tr>
</tbody>
</table>
### Topic | Objectives
---|---
5 Employment and the economy | SA20 Maintain high and stable levels of employment and promote sustainable economic growth and competitiveness.
6 Flood risk / climate change adaptation | SA12 Reduce the emissions of greenhouse gases and manage the impacts of climate change; SA13 Reduce the risk of flooding and the resulting detriment to the local community, environment and economy.
7 Housing | SA1 Provide all residents with the opportunity to live in a decent home which meets their needs.
8 Historic environment | SA7 Protect and enhance the District’s historic environment.
9 Land and other resources | SA11 Maintain and improve soil quality; SA15 Promote the efficient use of land through the appropriate re-use of previously developed land; SA16 Improve the efficiency of resource use and achieve sustainable resource management.
10 Landscape | SA9 Protect and enhance the District’s countryside and rural landscape.
11 Transport | SA17 Improve accessibility to all services and facilities; SA18 Improve efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.
12 Water | SA10 Maintain and improve the water quality of the District’s rivers and groundwaters and other water bodies.

### PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise a ‘reasonable’ range of alternative approaches to site allocation, or ‘spatial strategy alternatives’, in time to inform development of the proposed submission version of the Hart Local Plan.

Specifically, Part 1 of the report -

1) explains the process of establishing the reasonable spatial strategy alternatives;
2) presents the outcomes of appraising the reasonable spatial strategy alternatives; and
3) explains reasons for establishing the preferred spatial strategy option, in light of the appraisal.

**Who led on this work?**

It is important to be clear regarding the division of responsibilities -

1) Establishing the reasonable alternatives is ultimately the responsibility of the Council; however; in practice AECOM has worked closely with the Council, as an advisor.
2) Appraising the reasonable alternatives is the responsibility of AECOM.
3) Establishing the preferred spatial strategy option is the responsibility of the Council.
Establishing reasonable alternatives

The main report explains how reasonable alternatives were established subsequent to a lengthy process of gathering evidence and examining/refining options. The process can be summarised in a diagram.

Establishing the reasonable alternatives

The process of establishing the reasonable alternatives is discussed within Chapter 6 of the Report, which is quite lengthy. As such, it is helpful to present a brief overview of each section within Chapter 6:

Section 6.1 Introduces the process, and presents the flow diagram.

Section 6.2 Presents a brief discussion of high-level issues/options, in particular focusing on the matters of: housing needs; other strategic considerations with a bearing on the quantum of homes to be provided for through the plan (e.g. providing for affordable housing needs); and high-level considerations in respect of the broad distribution of housing (primarily as understood on the basis of the three previous Local Plan consultations).

Section 6.3 Introduces the new settlement options that are available, and hence might potentially feature within reasonable spatial strategy alternatives.

Section 6.4 Introduces the settlement edge and rural site options that are available, and hence might potentially feature within reasonable spatial strategy alternatives.

Section 6.5 Draws together information from the three work-streams discussed above, in order to establish a single set of reasonable spatial strategy alternatives for appraisal.

The reasonable spatial strategy alternatives ultimately arrived at (within Section 6.5 of the SA Report) are presented below, across a table and series of maps. The key point to note is that there are a number of ‘constants’ across the alternatives (completions, 1 commitments, 2 sites within settlements, windfall sites 3 and allocation of Hartland Park as the only new settlement) and a number of ‘variables’. There are essentially two variables: 1) the approach to growth at strategic urban extensions (Pale Lane and/or West of Hook); and 2) the approach to growth at non-strategic urban extensions (an indicative package is identified, which is either delivered in full, or not delivered at all, across the alternatives).

Finally, by way of introduction to the reasonable alternatives, there is a need to explain the final row, which shows that the total quantum of homes varies between 36% and 68% above 292 dwellings per annum (dpa). 292 dpa is the ‘local housing need’ figure for Hart according to the Government’s draft ‘standardised methodology’ for calculating local housing need. However, it is important to note that the figure is in draft at the current time. The 2016 Hart, Surrey Heath and Rushmoor Strategic Housing Market Assessment (SHMA) found Objectively Assessed Housing Need (OAHN) for Hart to be higher.

1 i.e. sites that have been built since the start of the plan period.
2 i.e. sites with planning permission plus sites allocated within a neighbourhood plan.
3 i.e. unallocated sites that will come forward as they are in accordance with Local Plan policy.
The reasonable alternatives

<table>
<thead>
<tr>
<th>Option</th>
<th>Option 1 Do minimum</th>
<th>Option 2 Non-strategic</th>
<th>Option 3 Pale Lane</th>
<th>Option 4 West of Hook</th>
<th>Option 5 Pale Lane + non-strategic</th>
<th>Option 6 West of Hook + non-strategic</th>
<th>Option 7 Pale Lane + West of Hook</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions</td>
<td>798</td>
<td>798</td>
<td>798</td>
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<td>Commitments</td>
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<td>3663</td>
<td>3663</td>
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<td>Within settlements</td>
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<td>Windfall</td>
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<td>Constatats</td>
<td>Hartland Park</td>
<td>1428</td>
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<td>1428</td>
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<tr>
<td>Pale Lane, Fleet</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>-</td>
</tr>
<tr>
<td>South of Church Crookham, Fleet</td>
<td>-</td>
<td>200</td>
<td>-</td>
<td>-</td>
<td>200</td>
<td>200</td>
<td>700</td>
</tr>
<tr>
<td>West of Hook</td>
<td>-</td>
<td>90</td>
<td>-</td>
<td>-</td>
<td>90</td>
<td>790</td>
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<tr>
<td>West of Yateley</td>
<td>-</td>
<td>170</td>
<td>-</td>
<td>-</td>
<td>790</td>
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<td>East of Yateley</td>
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<td>North West of Crondall</td>
<td>-</td>
<td>65</td>
<td>-</td>
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<td>65</td>
<td>65</td>
<td>65</td>
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<tr>
<td>North of Reading Road, Eversley</td>
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<td>25</td>
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<td>25</td>
<td>25</td>
<td>25</td>
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<tr>
<td>Long Sutton or S Warnborough</td>
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<td>25</td>
<td>-</td>
<td>-</td>
<td>25</td>
<td>25</td>
<td>25</td>
</tr>
<tr>
<td>Total</td>
<td>6348</td>
<td>6948</td>
<td>7048</td>
<td>7138</td>
<td>7648</td>
<td>7648</td>
<td>7838</td>
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<tr>
<td>Total p.a.</td>
<td>397</td>
<td>434</td>
<td>441</td>
<td>446</td>
<td>478</td>
<td>478</td>
<td>490</td>
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<tr>
<td>% over 292 dpa</td>
<td>36%</td>
<td>49%</td>
<td>51%</td>
<td>53%</td>
<td>64%</td>
<td>64%</td>
<td>68%</td>
</tr>
</tbody>
</table>
LEGEND
- District Boundary
- Allocations
- SHLAA Sites
- Settlement

REASONABLE ALTERNATIVES:
OPTION 2

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LEGEND
- District Boundary
- Allocations
- SHLAA Sites
- Settlement

This drawing is to be used only for the purpose for which it was issued and is subject to amendment.
REASONABLE ALTERNATIVES: OPTION 4
REASONABLE ALTERNATIVES: OPTION 7
Appraising reasonable alternatives

Summary appraisal findings, in relation to the alternatives introduced above, are presented below.

At this point it is worth highlighting that the SA Report does also present an appraisal of a second set of alternatives, namely alternative new settlement options. Specifically, Appendix III of the SA Report presents an appraisal of: 1) a new settlement within the Murrell Green / Winchfield Area of Search; versus 2) a new settlement at Rye Common (which lies on the A287, between Odiham and Ewhurst. The aim is not to inform a decision on whether or not to allocate a site, but rather to inform a decision on which area of land to examine further, with a view to allocation through a subsequent Development Plan Document (DPD).

Appraisal methodology

Within each row of the table below the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using red / green) and also rank the alternatives.

Summary alternatives appraisal findings

<table>
<thead>
<tr>
<th>Topic</th>
<th>Accessibility</th>
<th>Biodiversity</th>
<th>Climate change mitigation</th>
<th>Communities</th>
<th>Employment and the economy</th>
<th>Flood risk / climate change adaptation</th>
<th>Historic environment</th>
<th>Housing</th>
<th>Land and other resources</th>
<th>Landscape</th>
<th>Transport and accessibility</th>
<th>Water</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option 1 Do minimum</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>=</td>
<td>=</td>
<td>3</td>
<td>2</td>
<td>3</td>
<td>3</td>
<td>3</td>
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<td>3</td>
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<tr>
<td>Option 2 Non-strategic</td>
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<tr>
<td>Option 3 Pale Lane</td>
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<tr>
<td>Option 4 West of Hook</td>
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<tr>
<td>Option 5 Pale Lane+ non-strategic</td>
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</tr>
<tr>
<td>Option 6 W of Hook + non-strategic</td>
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<td></td>
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<tr>
<td>Option 7 Pale Lane + W of Hook</td>
<td></td>
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</tbody>
</table>
Summary and conclusions

The first point to note is that the appraisal shows Option 1 ("Do minimum", i.e. allocate Hartland Park only) to perform well in terms of the majority of sustainability objectives, reflecting the identified constraints to growth within Hart. Higher growth options do perform better from a ‘Housing’ perspective; however, all options would result in significant positive effects as there would be a land supply in place to deliver the Government’s draft local housing needs figure in practice (i.e. with a sufficient 'buffer' for non-delivery, or delayed delivery, at one or more sites). Higher growth is supported because of the size of the buffer, with Options 5 and 6 performing particularly well as they would also involve a good mix of sites, in terms of size and distribution. Option 1 could potentially give rise to a degree of risk, in respect of ensuring a housing supply (potentially with knock-on implications for other sustainability objectives), given the degree of reliance on one site (namely Hartland Park); however, the risk is considered small. Also, the Council’s support for allocating land for a new settlement through a subsequent DPD helps to allay any concerns (see further discussion of the Council’s response to the alternatives appraisal findings within Chapter 8).

Focusing on other objectives -

- Accessibility - there are a number of factors, but on balance it is fair to conclude that Option 6 is worst performing, due to concerns regarding secondary school capacity at Fleet, plus concerns regarding the distribution of growth amongst lower order villages, including several with limited or no bus service.
- Biodiversity - both strategic sites are associated with significant constraints, as are certain of the smaller sites under consideration; hence ‘do minimum’ is the preferred option. Significant negative effects are predicted, for options other than the ‘do minimum’.
- Climate change mitigation - Option 7 performs best as it would involve a concentration of growth at two strategic-scale schemes, giving rise to the potential to deliver innovative measures that enable per capita CO₂ emissions from the built environment to be minimised. However, in practice, it is not clear that there are significant opportunities (going by the proposals submitted as part of current planning applications for these two sites), plus there is also a need to factor-in CO₂ emissions from transport.
- Communities – both of the strategic urban extension options (Pale Lane and West of Hook) give rise to certain concerns (e.g. in respect of noise pollution and safe walking/cycling) but issues are fairly limited.
- Employment and the economy – None of the sites in question would involve delivery of new employment land, and hence the alternatives are judged to perform broadly on a par.
- Flood risk / climate change adaptation – the ranking of the alternatives reflects an understanding that a strategic extension West of Hook gives rise to relatively limited flood risk concerns.
- Historic environment – both strategic sites are associated with significant constraints, as are certain of the smaller sites under consideration; hence ‘do minimum’ is the preferred option. Significant negative effects are predicted, for options other than the ‘do minimum’, albeit with some uncertainty.
- Land and other resources – the ranking of the alternatives, and the conclusion on ‘significant effects’, reflect an understanding that ‘West of Hook’ does not comprise ‘best and most versatile’ agricultural land.
- Landscape - the ranking of the alternatives reflects an understanding that a strategic extension at Pale Lane gives rise to relatively limited landscape concerns.
- Transport – the ranking of the alternatives reflects an understanding that a strategic extension West of Hook gives rise to relatively limited transport concerns.
- Water - the ranking of the alternatives reflects an understanding that a strategic extension West of Hook gives rise to relatively limited concerns in respect of water-related issues/objectives.

In conclusion, all alternatives are associated with certain ‘pros and cons’. The intention is for the Council and stakeholders to take this understanding into account when considering how best to ‘trade-off’ between competing objectives, and establish the ‘most sustainable’ option.
Establishing the preferred option

The following text is the response of Council Officers to the alternatives appraisal, i.e. reasons for supporting the preferred option in-light of the alternatives appraisal.

The preferred approach is Option 1, which involves allocating Hartland Park only, and therefore putting in place an overall land supply sufficient to provide (in theory, i.e. assuming no delays in delivery) for 395 dwellings per annum (dpa). The proposal is also to commit to 388 dpa as a ‘target’

The preferred approach is Option 1, which involves allocating Hartland Park only, and therefore putting in place an overall land supply sufficient to provide 397 dwellings per annum (dpa) (assuming no delays in delivery). The plan commits to 388 dpa as a ‘target’ that delivery of the plan should be monitored against, and which should be used for the purposes of calculating the rolling ‘five year housing land supply’ position.

The appraisal finds Option 1 to have pros and cons, as per all the alternatives; however, it is apparent that Option 1 performs well in terms of the majority of sustainability objectives, which itself is a strong indicator of overall ‘sustainability’. The general message, for the majority of sustainability objectives, is that allocation of one or more additional sites (whether through a strategic extension or package of smaller extensions) would lead to conflicts, given the constraints that exist across Hart, and not lead to significant opportunities for delivering enhancements, particularly in relation to infrastructure delivery.

The appraisal highlights that allocation of one or more sites, in addition to Hartland Park, would lead to stronger performance in terms of ‘Housing’ objectives; however, it is noted that Option 1 (i.e. allocation of Hartland Park only) would still lead to significant positive effects. Even if there were some unforeseen delay to delivery at Hartland Park, the size of the contingency under Option 1 (36%) means that, in all likelihood, local housing need (as currently understood, namely 292 dpa) would still be achieved; indeed, the likelihood is that ‘above local housing need’ would be delivered. Were ‘above local housing need’ to be delivered in practice, then the effect would be that affordable housing needs are met more fully (recognising that delivering the local housing need figure will result in a shortfall in respect of affordable housing needs). It could also transpire that a modest amount of housing is available to address any unmet needs that may arise within the HMA; however, current understanding is that unmet needs are unlikely in the context of the Government’s proposed standard methodology for calculating housing needs.

With a view to addressing any residual concerns, the Council will work closely with the Hartland Park site promoters to ensure timely delivery, and it is also important to note that a policy framework is proposed to support timely housing delivery. Specifically -

- site specific policy for Hartland Park increases certainty, and should help to ensure smooth progression through the planning application process;
- policy is proposed which is supportive of specialist accommodation in the countryside on suitable sites (Policy H4), rural exceptions sites for affordable housing (Policy H5) and other housing in the countryside, where it is essential for the proposal to be located in the countryside in accordance (Policy NBE1);
- the suite of proposed thematic policy should assist with successful delivery of windfall sites, and also timely progression of neighbourhood plans (which may choose to allocate sites for housing); and
- most importantly, there is the commitment to commence work immediately on a new Development Plan Document, which will allocate land for a new settlement within the Murrell Green/Winchfield ‘area of search’ (Policy SS3), which in turn will deliver homes and infrastructure from around the middle of the plan period, ahead of 2032.
APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the Interim SA Report answers the question – What are appraisal findings at this stage? – by presenting an appraisal of the Proposed Submission Plan. Appraisal findings are presented as a series of narratives under the ‘SA framework’ headings.

Presented below is the proposed Local Plan Key Diagram, as a means of introducing the key elements of the Proposed Submission Plan that are a focus of appraisal. Subsequently, summary appraisal findings are presented under the SA framework headings.

The Key Diagram
Accessibility

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.

Biodiversity

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 Site of Importance for Nature Conservation (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 Thames Basin Heaths Special Protection Area (TBHSPA) and Fleet Pond Site of Special Scientific Interest (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.

N.B. this conclusion differs to that reached at the Draft Plan stage, when ‘significant negative effects’ were predicted, given uncertainties regarding achievement of effective avoidance/mitigation measures. The situation has moved on considerably, with the proposed strategy now essentially ‘lower growth’, with no proposal to allocate small settlement extensions (which are more likely to be at risk of not providing effective Suitable Alternative Natural Greenspace, SANG) nor an allocation for a new settlement (rather, the proposal is to plan for a new settlement in the longer term, which will include careful planning of SANG).

Climate change mitigation

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 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.
Communities
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.

Employment and the economy
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.

Flood risk / climate change adaptation
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.

Historic environment
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.

Housing
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.

**Land and other resources**

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.

**Landscape**

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**.

**Transport**

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**.

**Water**

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 Water Cycle Study 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.
SA conclusions at this current stage

In conclusion, the appraisal has highlighted the likelihood of the Proposed Submission Plan resulting in significant positive effects in respect of ‘Housing’ objectives (due to local housing needs being provided for, and potentially exceeded with positive implications for affordable housing delivery) and ‘Land’ objectives (due to the decision to focus housing growth entirely on brownfield land), with no ‘significant negative effects’ predicted.

A range of other issues and impacts are also discussed, notably -

- **Accessibility** - the proposal to focus growth at Hartland Park is broadly supported, given the potential to deliver (or fund) new community infrastructure; however, it is noted that the site is not of a sufficient size to deliver a new secondary school.

- **Biodiversity** - Hartland Park is a sensitive site, and hence there is a need to apply caution. Detailed measures are proposed to avoid, mitigate and compensate for impacts; however, the potential for additional measures to be in place can be envisaged.

- **Climate change mitigation** - whilst a concentration of growth is supported, there remains a need for further work to ensure that opportunities for delivering ambitious low carbon energy infrastructure (and energy efficiency measures) are fully realised.

- **Economy and employment** - the proposal not to allocate any new employment sites, despite the housing permission/allocation at Hartland Park is broadly in accordance with the findings of the ELR. Also, there is added comfort in the knowledge that there will be good potential to deliver new employment land in the future, as part of a new settlement in the Murrell Green / Winchfield area. It is also noted that a robust strategy is proposed in respect of safeguarding existing strategic and locally important sites.

- **Landscapes and historic environment** - the proposal to focus growth at Hartland Park, rather than allocate a package of smaller greenfield urban extension sites, is strongly supported; however, there are certain landscape sensitivities associated with Hartland Park.

- **Housing** - in addition to the ‘headline’ matter of providing for local housing need, there is also a need to consider the mix of housing sites provided for by the plan, and also the potential for the allocated sites to deliver affordable housing. In this respect, Hartland Park has a risk attached in that it may prove costly to deliver, with implications for the number of affordable homes that can be delivered, and potentially also the timing of delivery.

- **Transport** - the proposal to focus growth at Hartland Park is supported, given that this site is relatively well located from a transport perspective, and there is the potential to deliver upgrades to transport infrastructure; however, detailed investigations are ongoing.

- **Water** - there is some uncertainty regarding Wastewater Treatment Capacity to accommodate Hartland Park, which could feasibly have implications for phasing / delivery.

The appraisal is also strongly supportive of the decision to defer an allocation of land for a new settlement in the Murrell Green/Winchfield Area, i.e. the proposal to identify an area of search at the current time, and then undertake further work ahead of making a formal allocation through a separate DPD. This provides an excellent opportunity to ensure that issues are addressed (e.g. in respect of biodiversity, landscape, heritage, traffic and agricultural land quality) and opportunities fully realised (most notably in respect of secondary school delivery).

The Council, and the appointed Planning Inspector, can give consideration to these appraisal conclusions during the Examination. Similarly, consideration should be given to suggested specific changes to policy wording (highlighted as recommendations) covering -

- **Biodiversity** - including around the matter of monitoring ‘no net loss’ and ‘net gain’;

- **Design at Hartland Park** - the matter of the site’s boundaries, including implications for movement, might be more explicitly addressed through policy;

- **Housing mix at Hartland Park** - the Council might consider whether this is a policy priority that deserves the establishment of more stringent requirements.
Next steps


Plan finalisation

Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

If found to be ‘sound’ the plan will be formally adopted by the Council. At the time of Adoption an ‘SA Statement’ will be published that sets out (amongst other things) ‘measures decided concerning monitoring’.

Monitoring

The SA Report must present ‘measures envisaged concerning monitoring’.

Within the plan document, monitoring is a focus of the final chapter, where it is explained that: *“The Council’s annual Authority Monitoring Report (AMR) will be used to report on the effectiveness of delivering the Strategic Objectives of the Local Plan…”* The Chapter goes on to present a detailed monitoring framework.

The other key proposal is relates to triggers for a Local Plan Review. The proposal is –

*“The Council will commence a review of the Local Plan in 2021 unless triggered sooner by other factors which could include: results of annual monitoring on the effectiveness of the plan in line with the Plan’s Monitoring Framework and having particular regard to the monitoring of housing delivery; significant changes to national planning policy and/or legislation; duty to co-operate issues, particularly addressing housing and employment needs within the Housing Market Area / Functional Economic Area; and any other reasons that render the Plan, or part of it, out of date.”*

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 increased secondary school capacity
- Delivery of green infrastructure provision at Hartland Village
- Quality and area of SINCs

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 SINCs.