

Sustainability Appraisal (SA) for the Rushmoor Local Plan

SA Adoption Statement

Rushmoor Borough Council

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Quality information

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1. Introduction

Background

- 1.1 The Rushmoor Local Plan was submitted to Government, for examination by an appointed Planning Inspector, in February 2018. Following a near year-long Examination process, the Inspector published a final report on the Plan's legal compliance and soundness in January 2019. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Local Plan, incorporating modifications, was adopted at a Full Council meeting on 21st February 2019.
- 1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM.

SA explained

- 1.3 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution to sustainable development.
- 1.4 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment (SEA) Regulations) which transpose into national law European Union Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

This SA Adoption Statement

- 1.5 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement', and inform the public and statutory consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England, and Natural England.
- 1.6 In addition, Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the SA Report alongside the adopted Local Plan.
- 1.7 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the Rushmoor Borough Local Plan must explain:
 - How environmental (and sustainability) considerations have been integrated into the Local Plan;
 - How the SA Report has been taken into account during the preparation of the plan;
 - The reasons for choosing the plan as adopted, in the light of other reasonable alternatives dealt with;

- How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account; and
- The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.8 In association with the above requirements, this SA Adoption Statement is structured as follows:

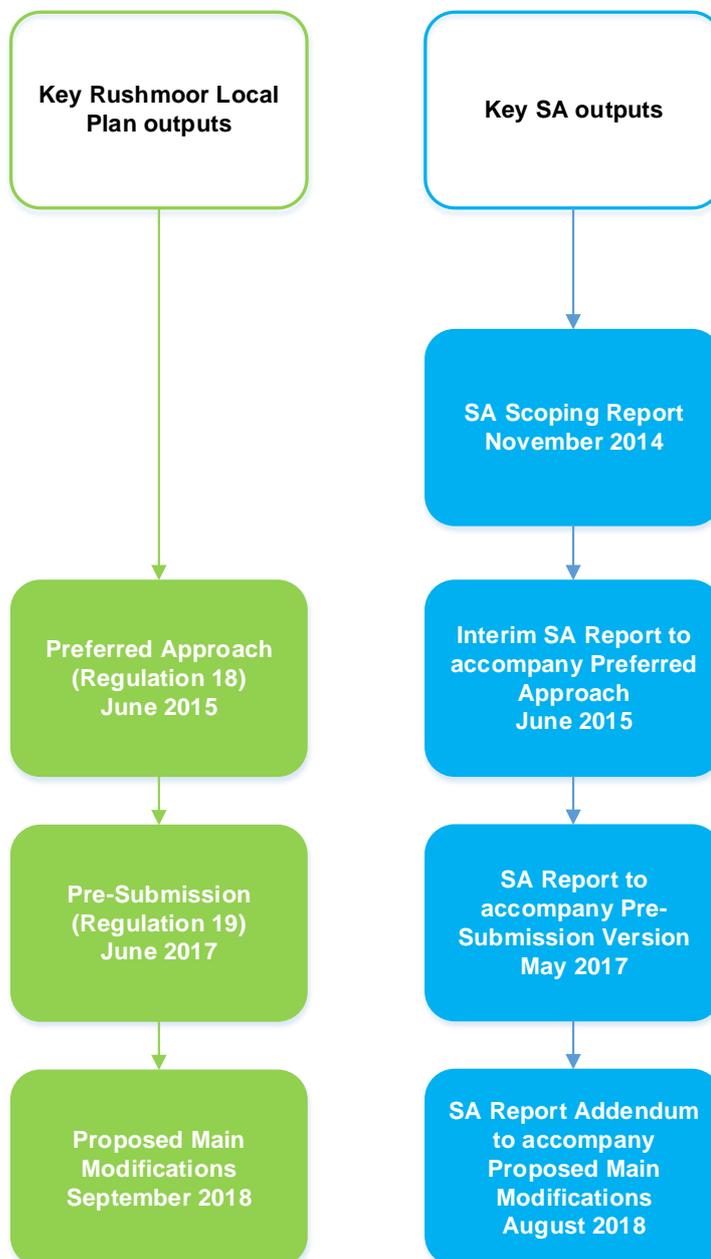
- **Chapter 2** presents the narrative for plan-making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above.
- **Chapter 3** describes how consultation responses have been taken into account through the Local Plan/ SA process.
- **Chapter 4** presents the monitoring programme for the SA.
- **Chapter 5** sets out some overall conclusions on the SA process.

2. How the SA process has informed and influenced the development of the Local Plan

Introduction

- 2.1 The SA process has informed and influenced the Rushmoor Borough Local Plan throughout its development. Reflecting this, four main SA documents have been prepared to accompany key points in plan development.
- 2.2 **Figure 2.1** below summarises the key documents which have been prepared for the Local Plan and accompanying SA process to date.

Figure 2.1: Key outputs of the Local Plan and accompanying SA process (October 2014 to January 2019)



- 2.3 As demonstrated in **Figure 2.1**, the SA process has been carried out iteratively and informed the development of the Local Plan at each key stage. The SA primarily influenced the Plan through the development and appraisal of reasonable alternatives as well as through the appraisal of the emerging Draft Plan (proposed policies and allocations). This section is structured accordingly.

Appraisal of reasonable alternatives

- 2.4 As part of the SA process, a series of reasonable alternatives or choices open to the Council with respect to the spatial development strategy were appraised and the findings fed back to the Council. In this way, the SA informed and influenced the development of the Local Plan.
- 2.5 The narrative within this section is structured according to the main plan-making/ SA steps, which are as follow:
- Preferred Approach (2015); and
 - Pre-Submission (2017)

Preferred Approach (2015)

- 2.6 The first stage of public consultation known as the 'Preferred Approach' took place in June and July 2015. The document set out a number of different options for policies and proposals for consideration based on the evidence available at that time. The purpose of the consultation was to canvass views on the options as well as preferred approaches and allow stakeholders an opportunity to suggest alternative approaches or further issues that should be addressed within the draft plan.
- 2.7 Based on evidence updates, including the Housing Market Area (HMA) Analysis (2013), the Joint Strategic Housing Market Assessment (SHMA) (2014), the Strategic Housing Land Availability Assessment (SHLAA) (2015), the Employment Land Review (2015), the Five Year Housing Land Supply Paper (2014-2019), and the Housing Delivery Topic Paper (2015) the Preferred Approach Document identified four growth options relating to the overall level of growth to be planned for over the plan period. The Interim SA Report¹ presented an appraisal of these four growth options, and the appraisal findings fed into subsequent plan-making.
- 2.8 Following this work, the Council decided to progress Option A (the provision of 8,200 new homes between 2011-2032 subject to SPA requirements being met) as it sought to reasonably meet the housing needs based on up-to-date evidence and taking account of existing constraints to development within the Borough.

Pre-Submission (2017)

- 2.9 Following the Preferred Approach consultation in 2015, the evidence base and further technical work was progressed. It was therefore recognised that further work was needed to refine understanding of spatial strategy alternatives (i.e. continue the process of refinement discussed above)² and ultimately arrive at reasonable alternatives for appraisal/ consultation. The task involved giving consideration to 'top-down' factors and 'bottom-up' factors, before establishing reasonable alternative spatial strategies.

¹ Rushmoor Borough Council (2015) Rushmoor Borough Council Local Plan: Preferred Approach Consultation Sustainability Appraisal Report [online] available at: <https://www.rushmoor.gov.uk/CHttpHandler.ashx?id=14950&p=0>

² National Planning Practice Guidance is clear that understanding of alternatives should be 'refined' over time through the SA process.

‘Top-down’ considerations

- 2.10 The Council undertook an analysis in 2013, which identified that whilst Rushmoor has cross-boundary migration and commuting links with a number of neighbouring local authorities, the strongest links are with Hart and Surrey Heath Councils. This was corroborated by work undertaken on the same issue by those two councils. The conclusion was that the three authorities form a Housing Market Area (HMA) and on this basis, the three councils commissioned the preparation of a new joint SHMA.
- 2.11 The joint SHMA was published in January 2017 and identified a housing need of 1,200 homes per annum across the HMA between 2014 and 2032. Of these, 436 homes per annum were identified as being required within Rushmoor, which equates to a total need of 7,850 dwellings to be provided in the Borough over the Plan period (2014 to 2032). This is a slight reduction (34 dwellings per annum) in the total need identified in the previous joint SHMA published in 2014.
- 2.12 The housing need figure set out in the SHMA was the starting point against which an assessment of physical and environmental constraints could be made to determine whether the housing needs could be met or, if not, what the capacity of the Borough might be.

‘Bottom-up considerations

- 2.13 The main piece of evidence which was used to help determine whether housing needs can be met is the Strategic Housing and Economic Land Availability Assessment (SHELAA). Using a base date of 31st March 2016, the SHELAA identified the potential capacity for the delivery of 7,800 dwellings up to 2032 from sites with planning permission where development has not yet started and other sites identified as having potential for housing development. In addition, 472 homes at that point had been built since 2014 and the SHELAA identified a windfall allowance (450 homes) for sites not covered by site specific identification in the SHELAA because they were too small. In total, these sources identify potential capacity in the Borough of around 8,700 new dwellings between 2014 and 2032.

Establishing the reasonable alternatives

- 2.14 The emerging findings of the joint SHMA, SHELAA and wider assessments were discussed at a meeting between Council Officers and AECOM in early November 2016. This, along with the wider evidence and consultation responses received on the Preferred Approach, informed the identification of three spatial strategy options (‘reasonable alternatives’) to be explored through the SA process for the Rushmoor Local Plan.

Option 1 - Roll forward the Preferred Approach

- 2.15 This option sets the expected yields on sites as previously set out in the Preferred Approach. This option would deliver a total of 7,609 homes over the plan period, which would have resulted in a shortfall of 239 homes against OAHN.

Option 2 - Revised Preferred Option

- 2.16 This option identified an increased scale of development on the following sites:
- The Galleries from 206 to 500 homes (SHELAA 554);
 - Meudon House/115-117 Pinehurst from 100 to 300 homes (SHELAA 518);
 - the Civic Quarter from 250 to 700 homes (SHELAA 15); and
 - Union Street East from 80 to 130 homes (SHELAA 591)
- 2.17 It also identifies capacity for housing on Blandford House and Malta Barracks (SHELAA 572), which is outside the Defined Urban Area.

2.18 This option would deliver a range between 8,762 - 8,792 homes over the plan period, resulting in 914 to 944 new homes above the OAHN.

Option 3 - Option 2 + deallocated employment sites and undeveloped land within existing employment designations

2.19 This option also identified an increased scale of development on the following sites:

- The Galleries from 206 to 500 homes (SHELAA 554);
- Meudon House/115-117 Pinehurst from 100 to 300 homes (SHELAA 518);
- the Civic Quarter from 250 to 700 homes (SHELAA 15); and
- Union Street East from 80 to 130 homes (SHELAA 591)

2.20 It also identified capacity for housing on Blandford House and Malta Barracks (SHELAA 572), which is outside the Defined Urban Area.

2.21 In addition, this option included the delivery of homes on deallocated employment sites (in the emerging Local Plan), which are currently occupied by non-residential uses (Rushmoor Borough Council offices and Esterline). It also included the delivery of homes on undeveloped land within sites protected for employment uses (Civic Enclave and Farnborough Business Park).

2.22 This option would deliver a range between 9,362 - 9,392 homes over the plan period. This would deliver 1,514 to 1,544 above the OAHN.

2.23 The majority of development proposed under each of the options is comprised of committed development, which includes completions (472) and sites with existing planning permission (5,059), including development at Wellesley (Aldershot Urban Extension). Therefore, the variation between options reflected the availability of sites for potential allocation in the Local Plan, the density of development to be delivered on them and potential development of deallocated employment sites and undeveloped land within existing employment designations.

Appraising the reasonable alternatives

2.24 The three reasonable alternatives identified above were subject to appraisal through the SA process. The SA Report³ accompanying the Pre-Submission Version of the Local Plan (which was submitted for independent Examination in February 2018) presents summary findings for this appraisal in Chapter 7, and the detailed appraisal matrices are presented in Appendix IV. The findings of the SA informed the Council's outline reasons for selecting the preferred approach (Option 2) in light of the alternatives considered (see Chapter 8 of the 2017 SA Report).

Appraisal of the Draft Plan

2.25 At various stages of plan making, the SA process has appraised and informed emerging Local Plan policies and allocations.

Preferred Approach (2015)

2.26 As highlighted in the introduction to this Section, the Preferred Approach Draft Local Plan was released for consultation in June 2015. The document presented a full Draft Local Plan, including a range of policies for guiding development in Rushmoor.

2.27 The Preferred Approach consultation was accompanied by an SA Report (2015). This was designed to inform the consultation through presenting an appraisal of the planning policies and guidance presented in the Preferred Approach document.

³ AECOM (2017) Sustainability Appraisal (SA) for the Rushmoor Local Plan SA Report [online] available at: <https://www.rushmoor.gov.uk/CHttpHandler.ashx?id=17849&p=0>

Pre-Submission (2017)

2.28 The planning policies were then updated for the Regulation 19 Pre-Submission consultation, and again appraised through the SA process and recommendations made. The findings of the appraisal and the subsequent recommendations were presented in Part 2 (Chapters 7 to 8) of the SA Report (May 2017) accompanying the Pre-Submission document on consultation in June 2017.

Proposed Main Modifications (2018)

2.29 The Rushmoor Local Plan was submitted to Government for Examination in February 2018. It was then the focus of Examination hearings in May 2018. During the hearings, the Inspector gave her preliminary views on the matters discussed and indicated that modifications would be necessary to make the Plan 'sound'. She invited the Council to develop a list of proposed modifications, for her agreement and subsequent publication.

2.30 The proposed modifications were published for consultation alongside a SA Report Addendum⁴ in September 2018. The SA Report Addendum presented an appraisal of the proposed Main Modifications to the Plan.

⁴ AECOM (2018) Sustainability Appraisal (SA) for the Rushmoor Local Plan SA Report Addendum [online] available at: <https://www.rushmoor.gov.uk/CHttpHandler.ashx?id=19531&p=0>

3. Consultation responses and how they have been taken into account

- 3.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report were taken into account.
- 3.2 As discussed in Chapter 2 (and as visualised in Figure 2.1), at each stage of the Plan's development, an SA Report was published alongside the Plan for consultation.
- 3.3 Consultation was carried out with:
 - the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England);
 - other key stakeholders; and
 - the general public.

Responses received at Regulation 18 and 19 stages

- 3.4 The responses received prior and subsequent to publication of the Local Plan have been presented in the Rushmoor Local Plan (Regulation 22) Consultation Statement. This includes a description of the key consultation processes undertaken for the Rushmoor Plan, a summary of the main issues raised by responses and how they have been addressed.
- 3.5 The Consultation Statement (January 2018) can be accessed at the following location:
<https://www.rushmoor.gov.uk/article/10619/Rushmoor-Local-Plan-examination-library>
(CD/01/06)
- 3.6 Any representations referring directly to the published SA documents were taken into account and informed subsequent stages of the SA process.

Responses received at the Main Modifications stage

- 3.7 Representations received that referred directly to the SA Report Addendum published in September 2018 were reviewed and taken into account and it was determined that no further SA work was necessary.

4. Monitoring

- 4.1 The SEA Regulations require that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”*
- 4.2 The Regulations also state that the SA Adoption Statement should set out *“...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.”*
- 4.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA are based on data that is already being routinely collected at a local level by Rushmoor Borough Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the Local Plan’s implementation in relation to the SA framework and outcomes, including areas where the SA identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Plan are achieved through the planning process.

Table 4.1: SA monitoring programme for the Rushmoor Borough Local Plan

SA topic	Relevant indicators proposed in the Local Plan
Biodiversity	<ul style="list-style-type: none"> • Improvements to green infrastructure • Quality and area of SPA • Quality and area of SSSIs • Quality and area of SINCs • Amount of land (ha) implemented as SANG. • Air quality monitoring on the SPA/SAC
Climate change	<ul style="list-style-type: none"> • Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds • Number of developments completed with SuDS measures implemented • Number of planning applications granted contrary to Thames Water’s advice on pluvial flooding • Improvements to green infrastructure
Community and wellbeing	<ul style="list-style-type: none"> • Number of Super Output Areas in the bottom 20% in the National Indices of Multiple Deprivation • Amount of open space (in terms of district parks, recreational grounds and local open space). • Annual total number of business aviation movements • Total number of weekend flight movements
Economy and employment	<ul style="list-style-type: none"> • Number of jobs in the Borough • Loss of land to non-employment uses at the defined Strategic Employment Sites • Loss of land to non-employment uses at the defined Locally Important Employment Sites

SA topic	Relevant indicators proposed in the Local Plan
Historic environment	<ul style="list-style-type: none"> • Number and status of listed buildings
Housing	<ul style="list-style-type: none"> • Net additional dwellings • Net affordable housing completions
Landscape	<ul style="list-style-type: none"> • Amount of open space (in terms of district parks, recreational grounds and local open space)
Transport and traffic	<ul style="list-style-type: none"> • Congestion-average extra journey time during the morning peak - A325 Farnborough Road
Natural resources	<ul style="list-style-type: none"> • Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds • Number of developments completed with SuDS measures implemented • Proportion of new homes meeting the Building Regulations optional requirement of 110 litres/person/day • Proportion of new major, non-residential developments reaching or exceeding BREEAM 'very good' standard

5. Conclusions on the SA process

- 5.1 This SA Adoption Statement demonstrates that a robust and iterative SA process has been progressed alongside plan-making, with appraisal findings feeding in to decision-making at numerous junctures, and with three reports having been published for consultation alongside plan documents. Any representations received were taken into account and informed subsequent stages of the SA process.
- 5.2 In summary, the following reports were published as part of the SA process:
- SA Scoping Report (2014);
 - Interim SA Report (2015);
 - SA Report (2017); and
 - SA Report Addendum (2018).
- 5.3 Most importantly, in terms of compliance with both the SEA and Local Planning Regulations, the SA Report was published alongside the Pre-Submission (Regulation 19) version of the Rushmoor Borough Local Plan in 2017, presenting the required information. The report served to inform representations on the Plan, and then served to inform plan finalisation.
- 5.4 This SA Adoption Statement is the final step in the SA process.

