THE RUSHMOOR LOCAL PLAN 2014 - 2032

Rushmoor Local Plan Draft Submission

Habitat Regulations Assessment

June 2017



Table of Contents

1	Introduction	6
1.1	Scope of the assessment	6
1.2	Current Legislation	6
1.3	Rushmoor Borough	7
1.4	This report	10
2	Methodology	11
2.1	Introduction	11
2.2	Likely Significant Effects (LSE)	12
2.3	Appropriate Assessment and Mitigation	13
2.4	Confirming other plans and projects that may act in combination	13
3	Pathways of impact	
3.1	Introduction	
3.2	Urbanisation	
3.3	Recreational pressure	19
3.4	Atmospheric pollution	21
3.5	Water abstraction	27
3.6	Water Quality	27
3.7	Summary of Screening	
4	Thames Basin Heaths SPA	
4.1	Introduction	
4.2	Features of European Interest	
4.3	Conservation Objectives	
4.4	Key environmental conditions	
4.5	Potential effects of the Rushmoor Local Plan	
4.6	Conclusion	
5	Thursley, Ash, Pirbright and Chobham SAC	
5.1	Introduction	
5.2	Features of European interest	
5.3	Conservation Objectives	41
5.4	Key environmental conditions	41
5.5	Potential effects of the plan	
5.6	Conclusion	

6	Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA	
6.1	Introduction	
6.2	Features of European Interest	
6.3	Conservation Objectives	
6.4	Key environmental conditions	
6.5	Potential effects of the Local plan	
6.6	Conclusion	55
7	Thursley & Ockley Bogs Ramsar site	
7.1	Introduction	
7.2	Features of international interest: Ramsar criteria	
7.3	Key environmental conditions	
7.4	Potential effects of the plan	
7.5	Conclusion	
8	East Hampshire Hangers SAC	
8.1	Introduction	
8.2	Features of European interest	
8.3	Conservation Objectives	59
8.4	Key environmental conditions	60
8.5	Potential effects of the Local Plan	60
8.6	Conclusion	61
9	Wealden Heaths Phase II SPA	62
9.1	Introduction	
9.2	Features of European interest	
9.3	Conservation Objectives	
9.4	Key environmental conditions	62
9.5	Potential effects of the plan	63
9.6	Conclusion	
10	Shortheath Common SAC	69
10.1	Introduction	69
10.2	Features of European interest	69
10.3	Conservation Objectives	69
10.4	Key environmental conditions	
10.5	Potential effects of the plan	
10.6	Conclusion	70

11	Windsor Forest & Great Park SAC	71
11.1	Introduction	71
11.2	Features of European interest	71
11.3	Conservation Objectives	71
11.4	Key environmental conditions	71
11.5	Potential effects of the plan	71
11.6	Conclusion	72
12	Overall conclusions	73
Арре	endix 1 – Screening the Rushmoor Local Plan policies	77
Арре	endix 2 – Air Quality Analysis	148

1 Introduction

1.1 Scope of the assessment

- 1.1.1 The objective of this Habitat Regulations Assessment (HRA) is to identify any areas of the Rushmoor Local Plan that have the potential to cause an adverse effect on Natura 2000 or European sites, either in isolation or in combination with other plans and projects, and to devise appropriate mitigation strategies where such effects were identified.
- 1.1.2 European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.
- 1.1.3 An HRA report was prepared to support the Rushmoor Local Plan: Preferred Approach, which was published for consultation in June 2015. Natural England and the Environment Agency were consulted on the draft HRA. The purpose of this update to the HRA is to support the latest version of the Rushmoor Local Plan (Draft Submission).

1.2 Current Legislation

- 1.2.1 The need for HRA is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2010 (as amended). The ultimate aim of the Habitats Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 The Habitats Directive applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the SEA Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; merely that the assessment findings (as documented in the 'environmental report') should be 'taken into account' during preparation of the plan or programme. In the case of the Habitats Directive, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.2.3 All the European sites referred to in this document are listed in Table 1 and shown on Figure 1. In order to ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question:

Box 1. The legislative basis for Appropriate Assessment

Habitats Directive 1992

Article 6 (3) states that:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

Conservation of Habitats & Species Regulations 2010 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

1.3 Rushmoor Borough

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of an HRA of a Local Plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:
 - All sites within the borough boundary; and
 - Other sites shown to be linked to development within the Borough boundary through a known 'pathway' (discussed below)
- 1.3.2 Briefly defined, pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, CLG guidance states that the Appropriate Assessment (AA) should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (CLG, 2006, p.6).
- 1.3.3 There is one European site within the Borough of Rushmoor the Thames Basin Heaths Special Protection Area, from which the entire Borough is within 5km. This site is made up of many components, spread across numerous local authorities (as shown in Figure 1). There are a number of other European sites in the surrounding area and the potential for longer range and indirect effects upon these sites has been considered (Table 1). Figure 1 shows the location of these European sites in relation to Rushmoor Borough.
- 1.3.4 A summary in relation to each of these sites is set out in Chapters 4 to 11, including a brief description, reasons for its designation¹ and a summary of its environmental

¹ The designation of the Natura 2000 sites is determined by the EU Birds Directive and the EU Habitats Directive. Annex I of the Birds Directive relates to a list of endangered and migratory species requiring habitat protection. Annex I habitats and Annex II species are listed in the Habitats Directive as being under threat.

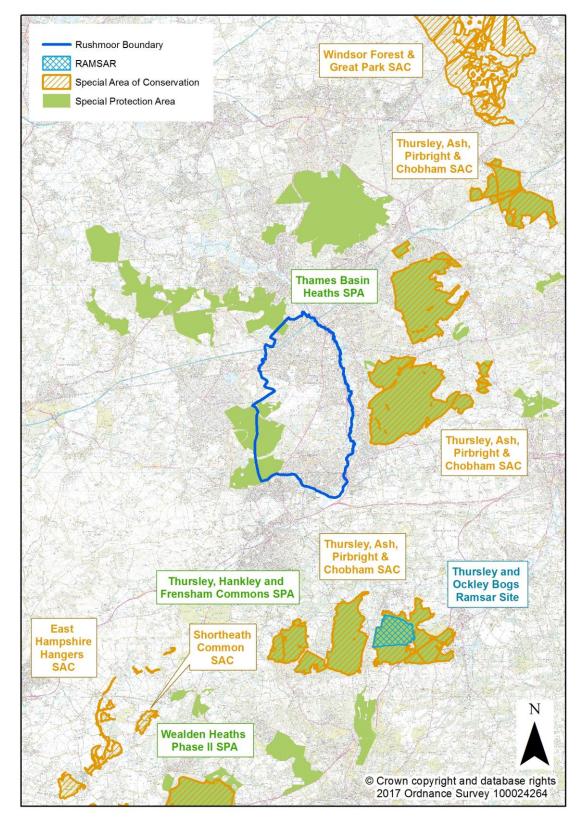
condition and conservation vulnerabilities. Unless otherwise stated, information in relation to these sites has been obtained from www.jncc.gov.uk².

Site	Minimum distance from Rushmoor Borough
Thames Basin Heaths SPA	Within the Borough
Thursley, Ash, Pirbright and Chobham SAC	0.9km
Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA	5.2km
Thursley and Ockley Bogs Ramsar site	5.2km
East Hampshire Hangers SAC	10km
Wealden Heaths Phase II SPA	11.5km
Shortheath Common SAC	13.5 km
Windsor Forest & Great Park SAC	14 km

Table 1: European sites considered in this Habitats Regulations Assessment

² The Joint Nature Conservation Committee (JNCC) is a statutory advisor to UK Government and devolved administrations

Figure 1: Location of European sites considered in this Habitats Regulations Assessment



1.4 This report

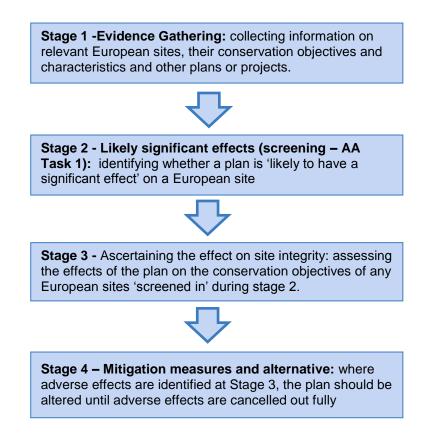
1.4.1 Chapter 2 of this report explains the process by which the HRA has been carried out. Chapter 3 explores the relevant pathways of impact and summarises the screening assessment of the policies. Chapters 4 to 11 are organised on the basis of one chapter per European site. Each chapter begins with a consideration of the interest features and ecological condition of the site and environmental process essential to maintain site integrity. An assessment of the Rushmoor Local Plan (Draft Submission version) in respect of each European site is then carried out. The key findings are summarised in Chapter 12: Overall Conclusions.

2 Methodology

2.1 Introduction

- 2.1.1 The HRA has been carried out in the absence of formal Government guidance. Communities and Local Government released a consultation paper on Appropriate Assessment of Plans in 2006³. As yet, no further formal guidance has emerged. Natural England has also produced its own internal guidance, which has been referenced in undertaking this HRA.
- 2.1.2 Figure 2 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

Figure 2: Four-Stage Approach to Habitat Regulations Assessment Source (CLG, 2006)



 $^{^{3}}$ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

2.2 Likely Significant Effects (LSE)

2.2.1 The first stage of any Habitat Regulations Assessment (AA Task 1) is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.

Box 2. The steps involved in screening a Habitat Regulations Assessment

- 1. Make a decision as to whether there is any mechanism by which the plan can affect any European site by altering its environmental conditions, focussing on those sites within the administrative boundary or which may be linked to development within the boundary by a pathway.
- 2. Determine the reasons for the European designation of these sites and review their conservation objectives.
- 3. Explore the environmental conditions required to maintain the integrity of the selected sites and become familiar with the current trends in these environmental processes.
- 4. Gain a full understanding of the plan and its policies and consider each policy within the context of the environmental processes could the policy lead to an impact on any identified process?
- 5. Decide if the identified impact is likely to lead to a significant effect.
- 6. Identify other plans and projects that might affect these sites in combination with the Plan and decide whether there is likely to be a significant effect "in combination". In practice 'in combination' assessments are only really necessary if the plan element in question has been screened out when considered in isolation.
- 7. If Likely Significant Effects have been identified, the HRA must progress to AA Task 2 (Appropriate Assessment), which will involve consideration of mitigation and avoidance measures.

2.3 Appropriate Assessment and Mitigation

- 2.3.1 With regard to those European sites where it was considered not possible to 'screen out' the Rushmoor Local Plan without detailed appraisal, it was necessary to progress to the later 'Appropriate Assessment' stage to explore the adverse effects and devise mitigation.
- 2.3.2 The steps involved are detailed in Box 3 below.

Box 3. The steps involved in the Appropriate Assessment exercise

- 1. Explore the reasons for the European designation of these sites.
- 2. Explore the environmental conditions required to maintain the integrity of the selected sites and become familiar with the current trends in these environmental processes.
- 3. Gain a full understanding of the plan and its policies and consider each policy within the context of the environmental processes would the policy lead to an impact on any identified process?
- 4. Decide if the identified impact will lead to an adverse effect.
- 5. Identify other plans and projects that might affect these sites in combination with the Plan and decide whether there any adverse effects that might not result from the Plan in isolation will do so "in combination".
- 6. Develop measures to avoid the effect entirely, or if not possible, to mitigate the impact sufficiently that its effect on the integrity of the European site is rendered effectively inconsequential.
- 2.3.3 The level of detail concerning developments permitted under land use plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with CLG guidance, which advises that the level of detail of the assessment should be 'appropriate' to the level of plan or project that it addresses (whilst meeting the relevant requirements).
- 2.3.4 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans, which in themselves have minor impacts, are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

2.4 Confirming other plans and projects that may act in combination

2.4.1 It is clearly neither practical nor necessary to assess the 'in combination' effects of the Rushmoor Local Plan within the context of all other plans and projects being undertaken in neighbouring authority areas. In practice therefore, in combination assessment is of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial

allocations proposed for other neighbouring authorities over the lifetime of the Local Plan.

2.4.2 Table 2 below identifies the annual housing allocations for each local authority area that either adjoin Rushmoor or are located in close proximity to the Borough. All of the local authorities listed below (with the exception of Basingstoke and Deane) contain European designated sites (Natura 2000). The table provides a useful overview of the scale of development proposed for the areas surrounding the borough of Rushmoor.

Local Authority	Annual Development Plan Housing Allocations*	Document
Basingstoke & Deane	850	Adopted Local Plan 2011-2029 (adopted May 2016)
Bracknell Forest	557	Adopted Core Strategy (Feb 2008) OAHN in latest SHMA is 635 dwellings per year. Preparing a comprehensive Local Plan (Issues and Options consultation June/July 2016)
Guildford	693	Proposed Submission Local Plan: Strategy and Sites (June 2016)
Hart	485	Draft Hart Local Plan: Strategy and Sites 2011 - 2032 (April 2017). OAHN in latest SHMA is 382 dwellings per year.
Surrey Heath	190	Adopted Core Strategy and Development Management Policies Development Plan Document (February 2012) OAHN in latest SHMA is 382 dwellings per year.
Waverley	519	Local Plan Part 1: Strategic Policies and Sites Pre- Submission Draft (June 2016). Submitted to government in December 2016.

Table 2: Annual housing requirements of other local authority areas

*For a number of authorities the housing figures detailed above are still being finalised and have not been formally been adopted.

2.4.3 There are other plans and projects that are often relevant to the 'in combination' assessment, most notably Thames Water's Water Resource Management Plan (2015 – 2040) and the Environment Agency's River Loddon Catchment Abstraction Management Strategy. These have all been taken into account in this assessment. Table 3 summarises documents that we have reviewed to inform our assessment:

Document		Relevant content
Assessors Report by Peter Burley (2007)	Report to the Panel for the Draft South East Plan Examination in Public on the Thames Basin Heaths Special Protection Area and Natural England's Draft Delivery Plan. 19 February 2007.	Comments on Natural England's Draft Delivery Document.
Core Strategies and Local Plans for other neighbouring authorities	Spatial development policies for Basingstoke and Deane, Bracknell Forest, Guildford, Hart, Surrey Heath and Waverley.	Provides projected levels of housing for authorities surrounding the borough of Rushmoor.
Rushmoor Borough Council (2017)	Rushmoor Borough's Draft Local Plan Draft Submission	Document under assessment.
Environment Agency (various)	Stage 3 and Stage 4 Appropriate Assessments: Review of Consents	Understanding of existing conditions at European sites
Environment Agency (2003)	The Loddon Catchment Abstraction Management Plan	Sets out the Environment Agency's position regarding future abstraction within the Loddon Catchment

Table 3: Documents reviewed in order to inform this assessment

Document		Relevant content
Environment Agency (2012)	Loddon Catchment Abstraction Licensing Strategy	
Environment Agency (2006a)	Water Resources in the South East report to latest South East Plan housing provision and distribution received from SEERA. May 2006, for commentary to SEERA	Water resources.
Environment Agency (2006b)	Creating a Better Place: Planning for Water Quality and Growth in the South East. Version 10.4	Sewage treatment capacity.
Hampshire County Council (2011)	The Hampshire Full Local Transport Plan, 2011 – 2031.	Transport schemes.
Natural England (2006)	Thames Basin Heaths Special Protection Area: Mitigation Standards for Residential Development. May 2006.	Avoidance and mitigation for recreational impacts on heathland SPA.
Rushmoor Borough Council (2014)	Thames Basin Heaths Special Protection Area: Avoidance and Mitigation Strategy	Sets out the approach that the Council will follow to seek to avoid harm to the heathlands arising from additional residential development.

Document		Relevant content	
Thames Basin Heaths Joint Strategic Partnership Board (2009)	Thames Basin Heaths SPA Delivery Framework	Sets out the agreed Framework regarding the Thames Basin Heaths SPA	
Thames Water (September 2014)	Water Resource Management Plan 2015-2040	Sets out the proposed approach to providing water resources in the future	
Rushmoor Borough Council, Hart District Council and Surrey Heath Borough Council (May 2017)	Water Cycle Study	Provides evidence on the effect of proposed development on water infrastructure and the water environment.	

3 Pathways of impact

3.1 Introduction

3.1.1 In carrying out an HRA, it is important to determine the various ways in which land use plans can have an impact on European sites, by following the pathways along which development can be connected with European sites. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon a European site.

3.2 Urbanisation

- 3.2.1 Urbanisation impacts result from an increase in population within close proximity to sensitive European sites. The detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:
 - Increased fly-tipping Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out⁴. Alien species may also be introduced deliberately or may be birdsown from local gardens.
 - Cat predation A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period⁵. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.
 - Uncontrolled fires Research in Dorset⁶ has indicated that a high proportion of heathland fires appear to be started by children, and are more likely to occur outside school time. The study identified a high frequency of wildfires associated with urban areas, and these were more likely to be reported in SSSIs that had densely developed areas within 500m of their boundaries.
- 3.2.2 The most detailed consideration of the link between relative proximity of development to European sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.
- 3.2.3 After extensive research, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework, which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this European site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated since this was the range within cats could be expected

18

⁴ Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. British Wildlife 8: 213-218.

 ⁵ Woods, M. et al. 2003. Predation of wildlife by domestic cats Felis catus in Great Britain. Mammal Review 33, 2 174-188
 ⁶ Kirby, J.S. & Tantrum, D.A.S. (1999). Monitoring heathland fires in Dorset: Phase 1. Terra Environmental Consultancy, Northampton.

to roam as a matter of routine and there was no realistic way of restricting their movements. As such, no new housing should be located within this zone.

3.2.4 Rushmoor Borough Council is a participatory organisation within the Thames Basin Heaths SPA Delivery Framework. Therefore, the Rushmoor Local Plan Policy NE1 states that:

"Residential development that would result in a net gain of units will not be permitted within 400 m of the SPA boundary unless, in agreement with Natural England, an appropriate assessment demonstrates that there will be no adverse effect on the SPA."

3.2.5 Urbanisation could also present a potential pathway of impact where development on employment sites is located within 400m of the SPA. This will not contribute to recreational pressure but could be a source of other proximity-based urbanisation impacts (i.e. fly-tipping).

3.3 Recreational pressure

- 3.3.1 Recreational use of a site has the potential to:
 - Cause disturbance to sensitive species, particularly ground-nesting birds such as woodlark and nightjar, and wintering wildfowl;
 - Prevent appropriate management or exacerbate existing management difficulties;
 - Cause damage through erosion; and
 - Cause eutrophication as a result of dog fouling.
- 3.3.2 Different types of European sites (e.g. heathland, chalk grassland) are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.
- 3.3.3 The effects of recreation on heathland sites have been described in a series of Reports⁷ ^{8 9 10 11 12}. It would appear that recreational pressure can have a significant adverse effect on the Annex 1 bird species for which the SPAs in this area are designated. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs likely to be a particular problem. A literature review on the effects of human disturbance on bird breeding found that 36 out of 40 studies reported reduced breeding success as a consequence of disturbance¹³. The main reasons given for the reduction in breeding success were nest abandonment and increased predation of eggs or young. Over years, studies of other species have

 ⁷ Liley, D. and R.T. Clarke (2002) – Urban development adjacent to heathland sites in Dorset: the effect on the density and settlement patterns of Annex 1 bird species. *English Nature Research Reports*, No. 463.
 ⁸ Murison, G. (2002) – The impact of human disturbance on the breeding success of nightjar *Caprimulgus europaeus* on

⁸ Murison, G. (2002) – The impact of human disturbance on the breeding success of nightjar *Caprimulgus europaeus* on heathlands in south Dorset, England. *English Nature Research Reports*, No. 483.

⁹ Land Use Consultants (2005) – Going, going, gone? The cumulative impact of land development on biodiversity in England. *English Nature Research Reports*, No. 626.

¹⁰ Rose, R.J. and R.T. Clarke (2005) – Urban impacts on Dorset Heathlands: Analysis of the heathland visitor questionnaire survey and heathland fires incidence data sets. *English Nature Research Reports*, No. 624.

 ¹¹ Tyldesley, D. and associates (2005) – Urban impacts on Dorset heaths: A review of authoritative planning and related decisions. *English Nature Research Reports*, No. 622.
 ¹² Underhill-Day, J.C. (2005) – A literature review of urban effects on lowland heaths and their wildlife. English Nature

¹² Underhill-Day, J.C. (2005) – A literature review of urban effects on lowland heaths and their wildlife. English Nature Research Reports, No. 623.

¹³ Hockin, D., M. Oundsted, M. Gorman, D. Hill, V. Keller and M.A. Barker (1992) – Examination of the effects of disturbance on birds with reference to its importance in ecological assessments. *Journal of Environmental Management*, **36**, 253-286.

shown that birds nest at lower densities in disturbed areas, particularly when there is weekday as well as weekend pressure¹⁴.

- 3.3.4 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer (Underhill-Day, 2005). In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces¹⁵.
- 3.3.5 Underhill-Day (2005) summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54%.
- However, these studies need to be treated with care. For instance, the effect of 3.3.6 disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population¹⁶. A literature review undertaken for the RSPB¹⁷ also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.
- 3.3.7 It should be emphasised that recreational use is not inevitably a problem. Many European sites are also National Nature Reserves (e.g. Thursley Common) or nature reserves managed by wildlife trusts and the RSPB. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.3.8 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites; Local Plans (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
 - Access management restricting access to some or all of a European site is not usually within the remit of the Borough Council and restriction of access may contravene a range of Government policies on access to open space, and Government objectives for increasing exercise, improving health etc. However, active management of access is possible, for example as practised on nature reserves.

¹⁴ Van der Zande, A.N., J.C. Berkhuizen, H.C. van Letesteijn, W.J. ter Keurs and A.J. Poppelaars (1984) - Impact of outdoor recreation on the density of a number of breeding bird species in woods adjacent to urban residential areas. Biological Conservation, **30**, 1-39.

Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) - Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. The London Naturalist, 74, 77-82.

⁵ Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance.

Biological Conservation, **97**, 265-268 ¹⁷ Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. RSPB research report No. 9.

- *Habitat management* is not within the direct remit of the Council. However, the Council can help to set a framework for improved habitat management by promoting cross-authority collaboration and S106 funding of habitat management.
- *Provision of alternative recreational space* can help to attract recreational users away from sensitive European sites, and reduce additional pressure on them. Some species for which European sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to other, less sensitive, sites. However, the location and type of alternative space must be attractive for users to be effective.

3.4 Atmospheric pollution

- 3.4.1 The information contained in table 4 was obtained from the Air Pollution Information System (APIS) website, which has been developed in partnership by the UK conservation agencies, regulatory agencies, and the Centre for Ecology and Hydrology.
- 3.4.2 APIS provides a Site Relevant Critical Load (SRCL) screening method, by which it is possible to explicitly review the Critical Loads, which are of most relevance to the most sensitive habitat type or species at the SSSI habitat location chosen.
- 3.4.3 It contains information on the Critical Loads for pollutants. That is the level of pollutant above which, habitats and species will be subject to detrimental effects, which include, damage to tissues, reduction in growth and alteration in species communities.

Pollutant	Source	Effects on habitats and species
Acid deposition	SO ₂ , NOx and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased N emissions may cancel out any gains produced by reduced S levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bedrock geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ +)- containing aerosol, which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one-half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (nitrates (NO_3) , nitrogen dioxide (NO_2) and nitric acid (HNO_3)) can lead to both soil and freshwater acidification. In addition, NO_x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive

Table 4. Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
		species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive mainly from NO_X and NH_3 emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species, which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O_3 above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide (SO ₂)	Main sources of SO_2 emissions are electricity generation, industry and domestic fuel combustion. Total SO_2 emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

- 3.4.4 The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH₃) and sulphur dioxide (SO₂). NOx can have a directly toxic effect upon vegetation. In addition, greater NOx or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.
- 3.4.5 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with Local Plans. NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NOx (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison¹⁸. Emissions of NOx could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.

¹⁸ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php

3.4.6 According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is $30 \ \mu gm^{-3}$; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'critical loads'¹⁹ of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH₃) for key habitats within the European sites considered within this assessment (Table 5). All sites currently exceed their critical loads for nitrogen deposition although all also have NOx concentrations below the critical level.

Table 5: Critical nitrogen loads, actual rates of nitrogen deposition and NOx concentrations²⁰ for the eight European sites considered within this assessment (APIS data accessed April 2017).

Site	Grid reference ²¹	Habitat	Minimum Critical Ioads (Kg N/ha/yr)	Actual nitrogen deposition (Kg N/ha/yr) ²²	Actual NOx concentrat ion (µgm ⁻³)
Thames Basin Heaths SPA	SU848518	Coniferous woodland	10	23.52	16.96
		Dwarf shrub heath	10	14.84	16.96
Thursley, Ash, Pirbright and Chobham SAC	SU897527	Raised bog and blanket bog	10	15.68	22.89
		Wet heaths	10	15.68	22.89
		Dry heath	10	15.68	22.89
Thursley, Hankley and Frensham	SU890433	Coniferous woodland	5	20.86	13.14
Commons SPA		Dry Heaths	10	13.58	13.14
Thursley and Ockley Bogs Ramsar site	SU906442	Raised bog and blanket bog	5	14.84	15.02
East Hampshire Hangers SAC	SU790404	Coniferous Woodland	5	26.74	13.43

¹⁹ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

 ²⁰ As NO2
 ²¹ For sites outside Rushmoor District, grid references relate to the closest points to the Borough.

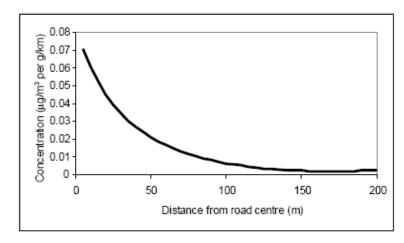
²² To a resolution of 5 km

Site	Grid reference ²¹	Habitat	Minimum Critical Ioads (Kg N/ha/yr)	Actual nitrogen deposition (Kg N/ha/yr) ²²	Actual NOx concentrat ion (µgm ⁻³)
		Fagus Woodland	10	26.74	13.43
		Meso- and eutrophic Quercus woodland	15	26.74	13.43
		Sub-Atlantic semi- dry calcareous grassland	15	16.94	13.43
Wealden Heaths Phase II SPA	SU810382	Coniferous woodland	5	24.64	13.27
		Dry Heaths	10	15.68	13.27
Shortheath Common SAC	SU779370	Raised and blanket bogs	5	25.48	12.6
		Valley mires, poor fens and transition mires	10	16.38	12.6
		Dry Heaths	10	16.38	12.6
Windsor Forest and Great Park SAC	SU957690	Oak woodland	10	23.88	23.05
		Beech forest	10	23.88	23.05

Local air pollution

3.4.7 Department for Transport guidance as expressed in the Design Manual for Roads and Bridges (DMRB) states that: *"beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant".*





- 3.4.8 This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by development proposed by the Rushmoor Local Plan. Given that sites detailed in Table 6 lie within 200m of major roads that may be regularly used by vehicle journeys arising from Rushmoor as a result of the increased population, it was concluded that air quality should be included within the scope of this assessment.
- 3.4.9 In March 2017, a high court judgement quashed part of the Lewes Joint Core Strategy. This judgement related to the assessment of nitrogen deposition impacts from increased traffic flows on Natura 2000 sites and the potential for in-combination effects. The Council has considered the implications of this judgement and assessed the potential incombination effects on Natura 2000 sites through:
 - The identification of 23 road links within 200m of Natura 2000 sites, which may be used by vehicle journeys arising from Rushmoor as a result of increased population (see Table 6 below).
 - The use of strategic transport modelling, which takes account of growth outside of the Borough, to identify the change of flows predicted on these road links.
 - Further investigation of road links where more than a minimal increase in flows are predicted (i.e. over 100 AADT rather than the previously accepted threshold of 1,000 AADT).
 - Consideration of findings of HRAs prepared to support other Local Plans, which result in an increased population and therefore could increase the number of vehicle journeys on roads identified in Table 6.
- 3.4.10 Further detail on this process is set out below and under the sections, which deal with potential atmospheric pollution impacts on the relevant designated sites.

Table 6: Roads within 200m of the European sites considered in detail within this assessment

Site	Roads within 200m considered in this assessment		
Thames Basin Heaths SPA	 M3 A30 A287 A3095 A322 A323 A324 A325 	 A327 A3016 B3012 B3015 B3411 B311 B3272 Bourley Road 	
Thursley, Ash, Pirbright and Chobham Common SAC	 M3 A3 A286 A287 A324 	 B3001 B3012 B3015 B3411 B311 B3272 	
Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA	 A3 A286 A287 B3001 		
Wealden Heaths Phase II SPA	A3A287A325		

- 3.4.11 Transport evidence has been prepared to support the Local Plan, using an evidence based Land Use and Transport Interaction model, which was commissioned by Hampshire County Council to produce the North Hampshire Transport Model Suite (NHTM). From this evidence, the Annual Average Daily Traffic (AADT) for the link roads listed above has been modelled and this identifies the change in flows between the Do Minimum and Do Something scenarios on roads within 200m of internationally designated sites.
- 3.4.12 The Design Manual for Roads and Bridges states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to further investigate road links where more than a minimal increase in flows is predicted (i.e. over 100 AADT).

3.4.13 Using three traffic forecast scenarios, information on average vehicle speeds²³ and percentage heavy-duty vehicles, both of which influence the emissions profile, nitrogen deposition rates were calculated. The difference between the Do Minimum and Do Something scenarios is essentially the Process Contribution (PC). Each road was investigated in a transect up to 200m away from each of the affected roads as recommended within guidance note HA207/07. For nitrogen deposition, if the numbers fall on or below 0.1 kgNha-1yr-1 (1% of the lowest point in the Critical Load range) then it can be screened out. More information is provided in Appendix 2.

3.5 Water abstraction

- 3.5.1 Water resources are recognised as an issue in the South East and the region is acknowledged as being an area of high water stress. However, water supply to meet the needs of future growth can be provided over the plan period, as outlined in the South East Water Resource Management Plan (WRMP). Sustainable use of water is a key issue for the borough and firm implementation of water efficiency standards is essential to manage demand on the water environment.
- 3.5.2 According to the Loddon Catchment Abstraction Licensing Strategy (2012), Rushmoor Borough lies within Assessment Point 7 (Blackwater) and this identifies that water is available for licencing. Rushmoor Borough is located within Water Resource Zone (WRZ) 4. South East Water's assessment of available water identifies that WRZ4 is in surplus from 2015/16 (+21.64 MI/d) through to 2031/32 (+6.77 MI/d). South East Water has identified a number of schemes that will benefit the Water Resource Zone. The measures which are proposed to maintain the supply-demand balance show that the available supplies will be sufficient to meet expected demand. The measures include:
 - Reinforce pumped delivery mains at Cookham and Boxalls,
 - Leakage reductions (2015-2020),
 - Ensure water efficiency (2015-2040),
 - Complete Boxall's Lane groundwater scheme (2015-2020),
 - Improvements to existing treatment works (2030-2040), and
 - Windsor to Surrey Hills regional transfer scheme (2030-2040).
- 3.5.3 The determination of surplus or deficit does take account of environmental limits and the implication is that there should be no requirement for damaging levels of abstraction from any aquifers connected to these European sites.

3.6 Water Quality

- 3.6.1 Development within Rushmoor Borough over the plan period will increase wastewater production. Wastewater from the Borough is treated by Thames Water and discharged to the River Blackwater, which ultimately drains to the River Thames. Development within Rushmoor falls into the catchments of three Waste Water Treatment Works (WwTWs): Camp Farm, Aldershot and Camberley.
- 3.6.2 A Joint Water Cycle Study (WCS) for Rushmoor, Hart and Surrey Heath was published in May 2017. The WCS includes an ecological appraisal, which identified a need for water quality modelling to take place for the following Waste Water Treatment Works (WwTWs)

²³ The speed limit was used as a default in keeping with HA207/07 guidance.

- Camp Farm WwTW
- Fleet WwTW
- Hartley Wintney WwTW
- Camberley WwTW
- Lightwater WwTW
- Eversley WwTW
- 3.6.3 The water quality modelling identifies the designated wildlife sites with pathways linking to WwTWs. The Thames Basin Heaths SPA is identified as being located in proximity to a waterbody that receives discharge from the Hartley Wintney and Fleet WwTWs. As noted above, planned development in Rushmoor will not be within the catchment of either of these WwTWs.
- 3.6.4 The only other internationally important wildlife site that is geographically close to the WCS area is Thursley, Ash, and Pirbright & Chobham SAC. This internationally designated site does not receive surface water from the watercourses linked to the modelled WwTWs, and its features for designation are not sensitive to changes in water quality that could be associated with the six WwTWs modelled.

3.7 Summary of Screening

- 3.7.1 All policies within the Rushmoor Local Plan were screened for potential conflicts within European sites. The majority of the policies could be 'screened out' as there was no potential for any of these policies to result in adverse effects on European sites. The full screening table for the policies is contained within Appendix 1.
- 3.7.2 The following policies were deemed to require consideration as they may lead to adverse effects on European sites generally because they promote and determine the location or scale of development (particularly housing and commercial development):
 - SS2 Spatial Strategy
 - SP1 Aldershot Town Centre
 - SP1.3 Westgate
 - SP1.4 The Galleries
 - SP1.5 Union Street East
 - SP1.6 Hippodrome House / Victoria Road
 - SP1.7 Westgate Phase II
 - SP1.8 Aldershot Railway Station and Surrounds
 - SP2 Farnborough Town Centre
 - SP2.3 Farnborough Civic Quarter
 - SP4.5 AAIB/RAIB
 - SP5 Wellesley
 - SP6 The Crescent
 - SP7 Meudon House/ 115-117 Pinehurst

- SP8 Land at 68-70 Hawley Lane
- SP10 Blandford House and Malta Barracks
- DE5 Proposals Affecting Existing Residential (C3) Uses
- DE11 Development on Residential Gardens
- LN3 Gypsies, Travellers and Travelling Showpeople
- LN3.1 Peabody Road Car Park
- LN3.2 Land at Hawley Lane South, Farnborough
- PC1 Economic Growth and Investment
- PC2 Strategic Employment Sites
- PC3 Locally Important Employment Sites
- PC4 Farnborough Business Park
- PC5 Cody Technology Park
- PC6 East Aldershot Industrial Cluster
- PC7 Hawley Lane South
- 3.7.3 It should be noted that only policies that have the potential for negative impact on European sites are screened in for assessment. Those policies that might have a beneficial effect are referred to, where appropriate, but have not been assessed. This is because the HRA is only concerned with adverse effects.

4 Thames Basin Heaths SPA

4.1 Introduction

- 4.1.1 Thames Basin Heaths Special Protection Area (SPA) covers an area of 8,400 hectares and consists of a number of fragments of lowland heathland scattered across Surrey, Hampshire and Berkshire. It is predominantly dry and wet heath but also includes areas of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations. Around 75% of the SPA has open public access being either common land or designated as open country under the Countryside and Rights of Way Act 2000. The SPA supports significant populations of three important bird species and consists of 13 Sites of Special Scientific Interest (SSSI). Three of the SSSIs are also designated as part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).
- 4.1.2 Eelmoor Marsh SSSI, part of Bourley and Long Valley SSSI and part of Castle Bottom to Yateley and Hawley Commons SSSI lie within Rushmoor Borough. An additional site, Ash to Brookwood SSSI lies outside, but close to, the Rushmoor boundary.
- 4.1.3 The location of the Thames Basin Heaths has resulted in the sites being subject to high development pressure. English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005²⁴. This was updated by the 'Thames Basin Heaths Special Protection Area Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009. These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.

In addition, Rushmoor Borough Council has produced a Thames Basin Heaths Avoidance and Mitigation Strategy (2014), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.

4.2 Features of European Interest²⁵

- 4.2.1 Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
 - During the breeding season:
 - Nightjar *Caprimulgus europaeus*: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);
 - Woodlark *Lullula arborea*: 9.9% of the breeding population in Great Britain (count as at 1997);
 - Dartford warbler *Sylvia undata*: 27.8% of the breeding population in Great Britain (count as at 1999).

²⁴ Prior to October 2005, the UK's approach to determining any significant effects on the integrity of Natura 2000 sites was not extended to an assessment of plans. However, an ECJ Judgement 3 on 20 October 2005 ruled that this approach did not meet the requirements of Article 6 of the Habitats Directive.
²⁵ Features of European Interest are the features for which a European sites is selected. They include habitats listed on

²⁵ Features of European Interest are the features for which a European sites is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive.

4.2.2 These species nest on or near the ground and as a result are susceptible to predation and disturbance.

4.3 Conservation Objectives

- 4.3.1 The Conservation Objectives for the European interests on the SSSI are, subject to natural changes:
 - to maintain²⁶, in favourable condition, the habitats for the populations of Annex 1 bird species²⁷ of European importance, with particular reference to:
 - lowland heathland and rotationally managed plantation

4.4 Key environmental conditions

- 4.4.1 The key environmental conditions that support the features of European interest have been defined as:
 - Appropriate management
 - Management of disturbance during breeding season (March to July)
 - Minimal air pollution
 - Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
 - Maintenance of appropriate water levels
 - Maintenance of water quality

4.5 Potential effects of the Rushmoor Local Plan

- 4.5.1 Three potential impacts of the Rushmoor Local Plan upon the SPA have been identified:
 - Urbanisation
 - Recreational pressure
 - Atmospheric pollution

Urbanisation

4.5.2 After extensive research, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework, which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this European site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated since this was the range within cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements. As such, no new housing should be located within this zone.

²⁶ maintenance implies restoration if the feature is not currently in favourable condition

²⁷ Nightjar, Woodlark and Dartford Warbler

4.5.3 Rushmoor Borough Council is a participatory organisation within the Thames Basin Heaths SPA Delivery Framework. Therefore, the Rushmoor Local Plan Policy NE1 states that:

"Residential development that would result in a net gain of units will not be permitted within 400 m of the SPA boundary unless, in agreement with Natural England, an appropriate assessment demonstrates that there will be no adverse effect on the SPA."

- 4.5.4 However, urbanisation could present a potential pathway of impact where development on employment sites is located within 400m of the SPA. This will not contribute to recreational pressure but could be a source of other proximity-based urbanisation impacts (i.e. fly-tipping). Two Strategic Employment Sites allocated in the Local Plan are within 400m of the SPA; Cody Technology Park and The Royal Pavilion. These are existing employment sites, where the majority of the site has been developed. Policy PC2 does support the redevelopment and regeneration of these sites over the Local Plan period. To avoid likely significant effect upon the SPA, were new development to be proposed on sites within the 400m zone, the Council in consultation with Natural England, will determine whether a likely significant effect on the integrity of the site will result, if required.
- 4.5.5 The following Local Plan policies will provide an adequate policy framework to avoid or mitigate the likelihood of significant effect from increased urbanisation on the Thames Basin Heaths SPA:
 - NE1: Thames Basin Heaths Special Protection Area Policy The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated.
 - **NE4: Biodiversity –** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Recreational pressure

- 4.5.6 Ground-nesting birds are vulnerable to disturbance, particularly from walkers and dogs. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs, likely to be a particular problem. Several studies have demonstrated that site-specific information is required to understand the relationship between recreational use of a site and any disturbance effects.
- 4.5.7 An estimated 5 million visitors use the Thames Basin Heaths per annum²⁸. Surveys conducted at a number of access points to the SPA in 2012 identify that 75% of visitors travel by car and 22% travel by foot, and that 81% of visitors live within 5km of the SPA²⁹.
- 4.5.8 The population of the 11 authorities around the Thames Basin Heaths SPA is forecast to increase from 1.23 million in 2012 to 1.4 million in 2032 (2012 based Household projections for England and local authority districts³⁰). This 13.5% increase in population is notwithstanding the forecasted reduction in average household size or

²⁸ Liley, D. et al. 2005. Visitor access patterns on the Thames Basin Heaths. *English Nature Research Report*, English Nature, PeterBorough

²⁹ Fearnley, H & Liley, D. 2013. *Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area* (*SPA*). Natural England Commissioned Reports, Number 136.

³⁰ CLG. 2015. Household Projections for England and local authority districts (2012 based)

any changes in population growth trends subsequent to the 2012 statistics. The projected 13.5% growth in population (assuming similar usage of recreational facilities) could lead to at least comparable increase in visits to the Thames Basin Heaths³¹. Such an increased use could have a cumulative impact upon the SPA (and the other nearby European sites).

- 4.5.9 Effects of the plan could occur due to housing development leading to increased recreational pressure. However, this would be effectively mitigated by implementation of the strategically agreed Thames Basin Heaths Delivery Framework in Rushmoor (July 2014) with the provision of 8ha/1000 population of Suitable Accessible Natural Greenspace (SANG) and contributions to the Strategic Access Management and Monitoring Programme.
- 4.5.10 In the aforementioned Avoidance Strategy, there have been three approaches identified that can lead to the avoidance or mitigation of adverse effects:
 - The provision of SANGs to attract people away from the SPA and hence reduce pressure on it;
 - Access management measures on, and monitoring of, the SPA to reduce the impact of people who visit the SPA (SAMM); and
 - Habitat management of the SPA, which will improve the habitat for ground nesting birds.
- 4.5.11 New development can provide, or contribute towards the provision of, SANGS and SAMM, and in doing so contribute towards meeting the requirements of HRA. All additional bespoke SANG packages will need to be agreed with Natural England as well as Rushmoor Borough Council as the competent authority.
- 4.5.12 The Thames Basin Heaths Special Protection Area Delivery Framework identified that new development between 400m and 5km from the SPA will need to develop or contribute towards SANG capacity. All residential development within Rushmoor will be located within 5km of the Thames Basin Heaths SPA
- 4.5.13 Natural England's guidance is as follows:
 - No development within 400m of the SPA³²;
 - SANGS of 12ha or less can supply a development within a catchment area of 400m – 2km;
 - SANGS of 12-20ha are sufficient to supply a 4km radius;
 - SANGS of 20+ha can supply 5km;
- 4.5.14 Rushmoor currently has four SANGs agreed with Natural England Hawley Meadows, Southwood Woodlands, and Rowhill, as well as a bespoke SANG, known as the Wellesley Woodlands, to mitigate the impact of the Wellesley development.
- 4.5.15 The Council will need to monitor the availability of SANG provision at the appropriate rate³³ to provide mitigation for the development proposed through the Local Plan. If there is insufficient land available to increase the provision of SANGs by the appropriate quantum, the Council will continue to work with Natural England and

³¹ Submission of Wokingham Borough Council (7265) to the Thames Basin Heaths Technical Sessions for the Examination in Public of The South East Plan

³² It is widely accepted that it is not possible to avoid an adverse impact from residential developments within 400 metres of the TBH SPA, and development will not be permitted unless it falls within specific categories agreed with the Council in consultation with Natural England. It should be noted that 10% of the land area in the Borough falls within this 400-metre 'zone of influence'.

³³ 8ha per 1000 population

adjacent authorities to ensure that appropriate SANGs can be provided outside Rushmoor Borough.

- 4.5.16 Assuming that the Council works with its partners to deliver new SANG it is considered that there will be no adverse effects on the SPA as a consequence of recreational impacts resulting from the development proposed in the Local Plan.
- 4.5.17 The following Local Plan policies will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Thames Basin Heaths SPA:
 - **Policy DE6: Open Space, Sport and Recreation** The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. The corollary of this is a potential reduction in recreational impacts upon the SPA.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SPA.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SPA.
 - NE1: Thames Basin Heaths Special Protection Area Policy The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. A core purpose of this policy is to reduce recreational impacts upon the Thames Basin Heaths SPA through the provision of sufficient SANG.
 - **NE2: Green Infrastructure** The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the SPA.
 - **NE4: Biodiversity –** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Atmospheric Pollution

- 4.5.18 Development proposed within the Rushmoor Local Plan is likely to result in increased car use, notably as a consequence of additional housing and business development in the borough. Policy SS2 (Spatial Strategy) indicates that at least 7,850 new homes will be delivered in the period 2011-2032, with 3,850 of these homes being located at Wellesley (also known as the Aldershot Urban Extension). An estimated capacity for housing which can be delivered up to 2032 is about 8,700 dwellings. Policy SS2 (Spatial Strategy) also identifies the need for Rushmoor to contribute to an overall requirement for Hart, Rushmoor and Surrey Heath Functional Economic Area to accommodate 9,000 additional B class jobs by 2032. It is reasonable to assume that the increased population (both resident and workplace), in addition to any increases in the amount of retail floorspace, will lead to increased vehicle movements.
- 4.5.19 When coupled with the scale of residential development proposed in the remaining Boroughs that adjoin the Heaths³⁴, there is an even greater likelihood of a substantial

³⁴ Windsor & Maidenhead, Wokingham, Bracknell Forest, Basingstoke & Dean, Hart, Guildford, Surrey Heath, Elmbridge, Mole Valley, Runnymede and Woking

increase in traffic movements on the major roads that bisect the components of the two European sites that lie within the Borough.

- 4.5.20 APIS (see Chapter 3) suggests that the SPA is currently experiencing deposition rates of key pollutants that exceed the critical loads for nitrogen deposition. Information on actual (i.e. measured rather than modelled) deposition rates of key pollutants at the site, along with evidence that the site is suffering as a consequence of air pollution (i.e. survey data indicating a decline in vegetative quality in line with changes in air quality), are not available but the UK Air Pollution Information System data is considered to provide a reasonable approximation.
- 4.5.21 The Thames Basin Heaths heathland habitat is known to be susceptible to adverse effects of nitrogen deposition and traffic will contribute towards that. Several major roads pass close to the SPA and pollutants from traffic may have a limited effect on parts of the site; road-generated pollutants rarely extend beyond 200m, with most being deposited closer to the road especially within denser habitats.
- 4.5.22 Transport modelling has been undertaken as part of the evidence to support the Local Plan. This has determined that there will be small increases in the traffic flows on the two major roads that lie within the 200m of the SPA in the Borough. In addition, the modelling has considered the increases of traffic flows expected on roads outside of the Borough that lie within 200m of the TBHSPA (Table 7 below).

Major Road within 200m	Change from Do Minimum to Do Something (2031) (AADT)	
	Vehicles	HGVs
A325	179	-7
A323	269	1
М3	-90	-5
A327	26	-3
A30	-10	0
A287	39	-4
A322	75	3
A3095	-415	-6
A324	35	-5

Table 7: Traffic Flow increases within 200m of Thames Basin Heaths SPA.

A3016	40	-4
Bourley Road	78	2
B3012	58	0
B3015	4	-2
B3411	12	-1
B311	208	-1
B3272	86	-2

4.5.23 The Design Manual for Roads and Bridges (DRMB) states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to investigate road links further where more than a minimal increase in flows is predicated (i.e. over 100 AADT). Therefore, potential nitrogen deposition rates along three of the road links listed in Table 7 were analysed (A325, A323 and B311). In summary, the analysis demonstrates that the annual mean nitrogen deposition rates are expected to be very low on these road links. Further information is provided in Appendix 2.

In combination effects

- 4.5.24 The major mechanism by which 'in combination' effects could arise from the Rushmoor Local Plan is through reduced air quality as a result of traffic increases on major roads that run through surrounding local authorities and within 200m of European protected sites. Transport and air quality modelling has been undertaken for some of the boroughs surrounding authorities as part of their spatial planning.
- 4.5.25 To support the HRA on the Guildford Local Plan: Local Strategies and Sites (Proposed Submission June 2016), an air quality impact assessment was undertaken to determine if the level of development provided in the Local Plan would result in likely significant effect upon the Thames Basin Heaths SPA. This concluded that the Local Plan will not result in likely significant effects upon the SPA as a result of changes in air quality, notwithstanding the likely elevation in NOx concentrations along some road links, due to:
 - No accompanying increase in nitrogen deposition or acid deposition;
 - A general lack of nesting habitat for SPA birds within the affected areas and the low likelihood that plantation clearing habitat would be negatively affected in any event; and
 - The fact that total 'in combination' NOx concentrations by 2033, while in some cases still in excess of the Critical Level, are predicted to be well below the level at which effects on vascular plants (other than growth stimulation due to nitrogen deposition) are likely to arise.

- 4.5.26 The report also said that notwithstanding the fact that no adverse effects were expected from Local Plan growth, it was recognised that background nitrogen deposition rates were high and thus mitigation measures should be included.
- 4.5.27 The HRA of the Surrey Heath Core Strategy (2011)³⁵ was able to conclude that "an effective policy framework exists to enable the delivery of sustainable transport measures to mitigate the effects of development within the DPD (when considered 'in combination' with the other Thames Basin Heaths authorities rather than in itself) to an adverse air quality effect associated with increased traffic on the M3, A3095 and A322 as they traverse the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC."
- 4.5.28 Therefore, the air quality analysis in this HRA and other available HRAs indicates that the Local Plan will not result in likely significant effect upon the SPA as a result in air quality. However, it is recognised that background nitrogen deposition rates are high and thus avoidance and mitigation measures should be considered.
- 4.5.29 There are four broad types of measure available to manage emissions from road transport:
 - Behavioural measures and modal shift reducing the amount of traffic overall;
 - Traffic management modifying traffic behaviour to control where emissions are generated;
 - Emissions reduction at source reducing the emissions level per vehicle; and
 - Roadside barriers reducing the impact on the public of emissions.
- 4.5.30 The Local Plan contains positive policy measures that aim to improve air quality by using the measures listed above³⁶, including:
 - **Policy SS2: Spatial Strategy -** states that *new development will be directed* to within the defined urban areas and that Rushmoor's hierarchy of town centre, district centre and local neighbourhood facilities will be maintained.
 - **Policy SP1: Aldershot Town Centre** includes the following elements within the strategy: '*To improve accessibility to and within the town centre by a choice of modes of transport by developing and implementing the Aldershot Town Access Plan';*
 - Policy SP2: Farnborough Town Centre includes the following elements within the strategy: 'To enhance accessibility for all into and around the Town Centre by providing better connections between the Town Centre and the Railway Station, edge-of-centre retail developments, Farnborough Business Park, adjoining residential areas and development to the south'.
 - **Policy SP3: North Camp District Centre** states that 'proposals for development should demonstrate that they improve accessibility, particularly by improving linkages for cyclists and pedestrians'.

³⁵ URS/ Scott Wilson (2011). Surrey Heath Core Strategy and Development Management Policies

Habitat Regulations Assessment of the Proposed Submission DPD

³⁶ Except for roadside barriers which is beyond the remit of local planning policy.

- Policy SP4: Farnborough Airport includes among the criteria for permitting the development 'that any material increase in air pollution or odour is mitigated adequately...'
- **Policy SP5: Wellesley** includes the following criteria for the delivery of the Extension:
 - 'Includes measures to support the regeneration of Aldershot Town Centre including the provision of good pedestrian, cycle and public transport links between the new development and the town centre;
 - includes measures to provide good pedestrian and cycle links to other destinations including North Camp (District Centre and Railway Station) and relevant secondary schools;
- Policy SP9: Aldershot Military Town includes the following criteria
 - Providing opportunities for minimising the need to travel and encouraging sustainable transport modes, particularly by maximising opportunities for access to bus routes
- Policy SP10: Blandford House and Malta Barracks includes the following criteria
 - Appropriate provision of infrastructure to mitigate the impact of development, including transport infrastructure improvements, to enable good pedestrian and cycle links to key destinations, including Wellesley, Aldershot and Farnborough, and the creation of satisfactory road access to the development from the primary road network;
- Policy LN5: Neighbourhood Deprivation Strategy includes among the criteria for permitting development that it '*Increases accessibility and opportunities for walking and cycling*';
- **Policy IN2: Transport** lists ten criteria to which development proposals will be subject, including:
 - Provides an appropriate on-site movement layout suitable for all potential users;
 - Provides a transport assessment and travel plan in accordance with the thresholds set out in the adopted 'Car and Cycle Parking Standards' supplementary planning document;
 - 'Takes appropriate measures to avoid adverse impact on air quality, including on European nature conservation sites.
- **Policy DE10: Pollution** the policy will prevent development that would result in pollution that poses unacceptable risks to the natural environment (which includes European sites).
- 4.5.31 In addition to requiring new development within 5km of the SPA to demonstrate avoidance or mitigation of any potential adverse effects (which could include reduced air quality), Policy NE1 includes a requirement for new development to contribute toward Strategic Access Management and Monitoring (SAMM) measures. One function of access management and monitoring should be to avoid damage to the SPA through atmospheric pollution.

- 4.5.32 It is important that there is also a mechanism established to monitor the effectiveness of the measures adopted (using the critical load/level as a monitoring target against which the success or failure of mitigation measures can be evaluated) and amend them as required.
- 4.5.33 This is in line with the precautionary principle as set out in EC Guidance³⁷ on its use:

'If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with the protection normally afforded to these within the European Community, the Precautionary Principle is triggered.

Decision-makers then have to determine what action to take. They should take account of the potential consequences of taking no action, the uncertainties inherent in the scientific evaluation, and they should consult interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of risk, and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.

Action is then undertaken to obtain further information enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as the scientific information remains inconclusive and the risk unacceptable'.

- 4.5.34 In order to ensure that the Council's robust measures to improve air quality across the borough are shown to be effective in terms of protection of the SPA, the Council should adopt a partnership approach to monitoring of air quality on the SPA.
- 4.5.35 The Council will seek to work with other local authorities, land managers, and strategic highway authorities to develop a framework by which air quality measures can be linked to monitoring of the air quality in the European site before and for a number of years after introduction of the measures. This will enable further measures to be devised if the air quality does not improve. In making these assessments, the critical load for the relevant habitat should be used as the target for assessment.
- 4.5.36 While not mitigation in itself, monitoring is an essential factor when dealing with an issue such as air quality, which has a high degree of uncertainty, since it will enable the effectiveness of air quality improvement measures to be evaluated and amended over the Local Plan period.

4.6 Conclusion

- 4.6.1 It can be concluded that the Rushmoor Local Plan provides a policy framework to deliver measures to avoid or mitigate the recreational, water resources and water quality effects of development on the Thames Basin Heaths SPA and other European sites through Policy NE1 and Policy NE4.
- 4.6.2 Transport modelling and air quality analysis has been undertaken as part of the evidence to support the Local Plan. This indicates that the Local Plan will not result in likely significant effect upon the SPA in respect of air quality.

³⁷ European Commission (2000): Communication from the Commission on the use of the Precautionary Principle.

5 Thursley, Ash, Pirbright and Chobham SAC

5.1 Introduction

5.1.1 Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) is a large and varied site consisting of four Sites of Special Scientific Interest (SSSI), three of which also form part of the Thames Basin Heaths SPA, with the fourth forming Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA. Ash to Brookwood Heaths SSSI and the southern part of Colony Bog and Bagshot Heath SSSI lie within Guildford Borough.

5.2 Features of European interest

- 5.2.1 Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats.
- 5.2.2 The qualifying Annex 1 habitats are:
 - North Atlantic wet with cross-leaved heath
 - European dry heaths
 - Depressions on peat substrates

North Atlantic wet heathland with cross-leaved heath

- 5.2.3 Wet heath is an important habitat for a range of vascular plant and bryophyte species of an oceanic or Atlantic distribution in Europe, several of which have an important part of their EU and world distribution in the UK.
- 5.2.4 Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage. The vegetation is typically dominated by mixtures of cross-leaved heath *Erica tetralix*, heather *Calluna vulgaris*, grasses, sedges and *Sphagnum* bog-mosses.
- 5.2.5 Northern Atlantic wet heaths with *Erica tetralix* are restricted to the Atlantic fringe of Europe between Norway and Normandy. A high proportion of the EU resource occurs in the UK.
- 5.2.6 The wet heath at Thursley contains several rare plants, including great sundew *Drosera anglica*, bog hair-grass *Deschampsia setacea*, bog orchid *Hammarbya paludosa* and brown beak-sedge *Rhynchospora fusca*. There are transitions to valley bog and dry heath. Thursley Common is an important site for invertebrates, including the nationally rare white-faced darter *Leuccorhinia dubia*.

European Dry heaths

5.2.7 European dry heaths typically occur on freely draining, acidic to circumneutral soils with generally low nutrient content. Ericaceous dwarf-shrubs dominate the vegetation. The most common is heather *Calluna vulgaris*, which often occurs in combination with gorse *Ulex* spp., bilberry *Vaccinium* spp. or bell heather *Erica cinerea*, though other dwarf-shrubs are important locally. Nearly all dry heath is semi-natural, being derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock or, in upland areas, as grouse moors.

- 5.2.8 European dry heaths are found in every EU Member State except for Greece, but are only extensive in the western oceanic fringes of Europe. A high proportion of the EU resource of European dry heaths occurs in the UK and dry heaths in the UK exhibit exceptional diversity in comparison with examples found elsewhere in the EU.
- 5.2.9 Dry heaths occur throughout the UK. They are particularly abundant in the uplands, where they may form extensive stands, which dominate the landscape. They are more localised in lowland areas, especially in south and central England, where they have declined in extent due to afforestation, agricultural improvement and other impacts.

Depressions on peat substrates

- 5.2.10 Depressions on peat substrates of the *Rhynchosporion* occur in complex mosaics with lowland wet heath and valley mire vegetation, in transition mires, and on the margins of bog pools and hollows in both raised and blanket bogs. The vegetation is typically very open, usually characterised by an abundance of white beak-sedge *Rhynchospora alba*, often with well-developed algal mats, the bog moss *Sphagnum denticulatum*, round-leaved sundew *Drosera rotundifolia* and, in relatively base-rich sites, brown mosses such as *Drepanocladus revolvens* and *Scorpidium scorpioides*. The Nationally scarce species brown beak-sedge *Rhynchospora fusca* and marsh clubmoss *Lycopodiella inundata* also occur in this habitat.
- 5.2.11 Depressions on peat substrates of the *Rhynchosporion* is a rare habitat type in the UK that exhibits a narrow range of ecological variation and has a restricted geographical distribution. This habitat type has a very discontinuous distribution, being found in largest quantity on heaths in southern England and on blanket and raised bogs in western Britain, with an outlying example in East Anglia.

5.3 Conservation Objectives

- 5.3.1 The following conservation objectives are defined for the qualifying Annex I habitats:
 - to maintain*, in favourable condition, the Northern Atlantic wet heath with cross-leaved heath (*Erica tetralix*).
 - to maintain*, in favourable condition, the depressions on peat substrates.
 - to maintain*, in favourable condition, the dry heath.

* maintenance implies restoration if the feature is not currently in favourable condition.

5.4 Key environmental conditions

- 5.4.1 The key environmental conditions that support the features of European interest have been defined as:
 - Appropriate management
 - Managed recreational pressure
 - Minimal air pollution
 - Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
 - Maintenance of appropriate water levels
 - Maintenance of water quality

5.5 Potential effects of the plan

- 5.5.1 Three potential impacts of the Rushmoor Local Plan upon the SAC have been identified:
 - Recreational pressure
 - Atmospheric pollution
 - Water abstraction

Recreational pressure

- 5.5.2 Effects of the Rushmoor Local Plan could occur due to housing development leading to increased recreational pressure. However, this is effectively mitigated by the strategy set out in the strategically agreed Thames Basin Heaths Delivery Framework (see Chapter 4). The interest features of the SAC, while sensitive to recreation, are not as sensitive as those of the Thames Basin Heaths SPA and the SAC and SPA overlap in large part in the areas closest to Rushmoor. Therefore, it is considered likely that the scale of SANGS provision, which will be provided to mitigate recreational impacts on the SPA, will also serve the SAC.
- 5.5.3 It is therefore considered that there will be no adverse effects on the SAC as a consequence of recreational impacts resulting from the development described in the Rushmoor Local Plan.
- 5.5.4 The following Local Plan policies will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Thursley, Ash, Pirbright and Chobham SAC:
 - **Policy DE6: Open Space, Sport and Recreation** The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. The corollary of this is a potential reduction in recreational impacts upon the SAC.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SAC.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities that could reduce recreational impacts upon the SAC.
 - NE1: Thames Basin Heaths Special Protection Area The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. A core purpose of this policy is to reduce recreational impacts upon the Thames Basin Heaths SPA.
 - **NE2: Green Infrastructure** The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the SAC.
 - **NE4: Biodiversity** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Atmospheric Pollution

- 5.5.5 Development proposed within the Rushmoor Local Plan is likely to result in increased car use, notably as a consequence of additional housing and business development in the borough. Policy SS2 (Spatial Strategy) indicates that at least 7,850 new homes will be delivered in the period 2011-2032, with 3,850 of these homes being located at Wellesley (also known as the Aldershot Urban Extension). An estimated capacity for housing which can be delivered up to 2032 is about 8,700 dwellings. Policy SS2 (Spatial Strategy) also identifies the need for Rushmoor to contribute to an overall requirement for Hart, Rushmoor and Surrey Heath Functional Economic Area to accommodate 9,000 additional B class jobs by 2032. It is reasonable to assume that the increased population (both resident and workplace), in addition to any increases in the amount of retail floorspace, will lead to increased vehicle movements.
- 5.5.6 When coupled with the scale of residential development proposed in the remaining boroughs adjacent to the SAC³⁸, there is an even greater likelihood of a substantial increase in traffic movements on the major roads that bisect the components of the two European sites that lie within the borough.
- 5.5.7 APIS (see Chapter 3) suggests that the SAC is currently experiencing deposition rates of key pollutants that exceed the critical loads for nitrogen deposition and ozone. Information on actual (i.e. measured rather than modelled) deposition rates of key pollutants at the site, along with evidence that the site is suffering as a consequence of air pollution (i.e. survey data indicating a decline in vegetative quality in line with changes in air quality), are not available but the UK Air Pollution Information System data is considered to provide a reasonable approximation.
- 5.5.8 The heathland within the SAC is known to be susceptible to adverse effects of nitrogen deposition and traffic will contribute towards that. Several major roads pass close to the SAC and pollutants from traffic may have a limited effect on parts of the site; road-generated pollutants rarely extend beyond 200m, with most being deposited closer to the road especially within denser habitats.
- 5.5.9 Transport modelling has been undertaken as part of the evidence to support the Local Plan. The modelling has considered the increases of traffic flows expected on roads outside of the Borough that lie within 200m of the SAC (Table 8 below).

Table 8: Traffic Flow increases within 200m of Thursley, Ash, Pirbright and Chobham SAC.

Major Road within 200m	Change from Do Minimum to Do Something (2031) (AADT)	
	Vehicles	HGVs
МЗ	-90	-5
A324	35	-5
A287	-44	0

³⁸ Windsor & Maidenhead, Wokingham, Bracknell Forest, Basingstoke & Dean, Hart, Guildford, Surrey Heath, Elmbridge, Mole Valley, Runnymede and Woking

Rushmoor Local Plan Draft Submission Habitat Regulations Assessment (June 2017)

A3	557	12
A286	-31	0
B3001	56	1
B3012	58	0
B3015	4	-2
B3411	12	-1
B311	208	-1
B3272	86	-2

5.5.10 The Design Manual for Roads and Bridges (DMRB) states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to investigate road links further where more than a minimal increase in flows is predicated (i.e. over 100 AADT). Therefore, potential nitrogen deposition rates along two of the road links listed in Table 8 above were analysed (A3 and B311). In summary, the analysis demonstrated that the annual mean nitrogen deposition rates are expected to be very low on these road links. Further information is provided in Appendix 2.

In combination effects

- 5.5.11 The major mechanism by which 'in combination' effects could arise from the Rushmoor Local Plan is through reduced air quality as a result of traffic increases on major roads that run through surrounding local authorities and within 200m of European protected sites.
- 5.5.12 Transport and air quality modelling has been undertaken for some of the boroughs surrounding authorities as part of their spatial planning.
- 5.5.13 To support the HRA on the Guildford Local Plan: Local Strategies and Sites (Proposed Submission June 2016), an air quality impact assessment was undertaken to determine if the level of development provided in the Local Plan would result in likely significant effect upon the Thursley, Ash, Pirbright and Chobham SAC. This concluded that the Local Plan will not result in likely significant effects upon the SAC as a result in changes in air quality.
- 5.5.14 The HRA of the Waverley Local Plan Part 1: Strategic Policies and Sites (Presubmission Draft July 2016) identified that all apart from one of the modelled roads was predicted to see a reduction in traffic flows over the Plan period. An increase in flows on the B3001 was identified. However, through air quality modelling the assessment has been able to conclude that no adverse effect would result.

- 5.5.15 Both reports also said that notwithstanding the fact that no adverse effects were expected from Local Plan growth, it was recognised that background nitrogen deposition rates were high and thus mitigation measures should be included.
- 5.5.16 Therefore, the air quality analysis in this HRA and other available HRAs indicates that the Local Plan will not result in likely significant effect upon the SPA as a result in air quality. However, it is recognised that background nitrogen deposition rates are high and thus avoidance and mitigation measures should be considered.
- 5.5.17 There are four broad types of measure available to manage emissions from road transport:
 - Behavioural measures and modal shift reducing the amount of traffic overall;
 - Traffic management modifying traffic behaviour to control where emissions are generated;
 - Emissions reduction at source reducing the emissions level per vehicle; and
 - Roadside barriers reducing the impact on the public of emissions.
- 5.5.18 The Local Plan contains positive policy measures that aim to improve air quality by using the measures listed above³⁹, including:
 - Policy SS2: Spatial Strategy states that new development will be directed to within the defined urban areas and that Rushmoor's hierarchy of town centre, district centre and local neighbourhood facilities will be maintained.
 - **Policy SP1: Aldershot Town Centre** includes the following elements within the strategy: 'To improve accessibility to and within the town centre by a choice of modes of transport by developing and implementing the Aldershot Town Access Plan';
 - **Policy SP2: Farnborough Town Centre** includes the following elements within the strategy: 'To enhance accessibility for all into and around the Town Centre by providing better connections between the Town Centre and the Railway Station, edge-of-centre retail developments, Farnborough Business Park, adjoining residential areas and development to the south'.
 - Policy SP3: North Camp District Centre states that 'proposals for development should demonstrate that they improve accessibility, particularly by improving linkages for cyclists and pedestrians'.
 - Policy SP4: Farnborough Airport includes among the criteria for permitting the development '*that any material increase in air pollution or odour is mitigated adequately...*'
 - **Policy SP5: Wellesley** includes the following criteria for the delivery of the Extension:
 - Includes measures to support the regeneration of Aldershot Town Centre including the provision of good pedestrian, cycle and public transport links between the new development and the town centre;

³⁹ Except for roadside barriers which is beyond the remit of local planning policy.

- includes measures to provide good pedestrian and cycle links to other destinations including North Camp (District Centre and Railway Station) and relevant secondary schools;
- Policy SP9: Aldershot Military Town includes the following criteria
 - Providing opportunities for minimising the need to travel and encouraging sustainable transport modes, particularly by maximising opportunities for access to bus routes
- Policy SP10: Blandford House and Malta Barracks includes the following criteria
 - Appropriate provision of infrastructure to mitigate the impact of development, including transport infrastructure improvements, to enable good pedestrian and cycle links to key destinations, including Wellesley, Aldershot and Farnborough, and the creation of satisfactory road access to the development from the primary road network;
- Policy LN5: Neighbourhood Deprivation Strategy includes among the criteria for permitting development that it 'Increases accessibility and opportunities for walking and cycling';
- **Policy IN2: Transport** lists ten criteria to which development proposals will be subject, including:
 - Provides an appropriate on-site movement layout suitable for all potential users;
 - Provides a transport assessment and travel plan in accordance with the thresholds set out in the adopted 'Car and Cycle Parking Standards' supplementary planning document;
 - 'Takes appropriate measures to avoid adverse impact on air quality, including on European nature conservation sites.
- **Policy DE10: Pollution** the policy will prevent development that would result in pollution that poses unacceptable risks to the natural environment (which includes European sites).
- 5.5.19 It is important that there is also a mechanism established to monitor the effectiveness of the measures adopted (using the critical load/level as a monitoring target against which the success or failure of mitigation measures can be evaluated) and amend them as required.
- 5.5.20 This is in line with the precautionary principle as set out in EC Guidance⁴⁰ on its use:

'If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with the protection normally afforded to these within the European Community, the Precautionary Principle is triggered.

Decision-makers then have to determine what action to take. They should take account of the potential consequences of taking no action, the uncertainties inherent in the scientific evaluation, and they should consult interested parties on the possible

⁴⁰ European Commission (2000): Communication from the Commission on the use of the Precautionary Principle.

ways of managing the risk. Measures should be proportionate to the level of risk, and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.

Action is then undertaken to obtain further information enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as the scientific information remains inconclusive and the risk unacceptable'.

- 5.5.21 In order to ensure that the Council's robust measures to improve air quality across the borough are shown to be effective in terms of protection of the SAC, the Council should adopt a partnership approach to monitoring of air quality on the SAC.
- 5.5.22 The Council will seek to work with other local authorities, land managers, and strategic highway authorities to develop a framework by which air quality measures can be linked to monitoring of the air quality in the European site before and for a number of years after introduction of the measures. This will enable further measures to be devised if the air quality does not improve. In making these assessments, the critical load for the relevant habitat should be used as the target for assessment.
- 5.5.23 While not mitigation in itself, monitoring is an essential factor when dealing with an issue such as air quality, which has a high degree of uncertainty, since it will enable the effectiveness of air quality improvement measures to be evaluated and amended over the Local Plan period.

Water resources

- 5.5.24 Development proposed within the Rushmoor Local Plan is likely to result in increased water use, notably as a consequence of housing and business development under Policy SS2 (the Spatial Strategy). The Environment Agency has previously investigated whether parts of Thursley, Hankley and Frensham Commons SSSI are being adversely affected by current levels of water abstraction in addition to studying the hydrological continuity between the major aquifer (Hythe Beds) and the minor aquifer (Folkestone Beds)⁴¹.
- 5.5.25 We understand that the Environment Agency considers that it will be possible for water companies to meet the future water resource requirements for the Rushmoor area (based on current growth predictions) without any increases in abstraction limits from watercourses and groundwater that are of importance to Thursley, Ash, Pirbright and Chobham SAC. This conclusion is based on modelling work that assumes new strategic water resource options, ongoing leakage control and increasing water efficiencies.' New strategic water resource options will need to be in place prior to any developments where additional abstraction impacting European sites would otherwise be required but this is provided for through Policy IN1 (Infrastructure and Community Facilities).
- 5.5.26 Unlike most of the indirect impacts on European sites that can derive from development (e.g. from recreational pressure or vehicle exhaust emissions) and which are generally not covered by any independent assessment or consenting regime, water supply is covered by a detailed abstraction licencing and Review of Consents process controlled by the Environment Agency. One of the principal functions of this

⁴¹ "I can confirm that the Environment Agency's Review of Existing abstraction licence consents appropriate assessment (undertaken in line with the requirements of Regulation 50 if the Habitats Regs) has been able to ascertain no adverse affect on the integrity of the Thursley, Ash, Pirbright and Chobham Common SAC from all identified EA regulated Licenses to Abstract Groundwater when assessed alone and in-combination with other potential impacts on water resources." Heather Lewis, Environment Agency, pers. comm. 2007

regime is to ensure that the abstraction of water at volumes, rates or times of year that would result in adverse effects on internationally designated sites do not take place.

- 5.5.27 Avoiding adverse effects on European sites as a result of increased scales of abstraction to supply new housing must therefore be principally the responsibility of the water companies through their Water Resource Management Plans, water supply operations and abstraction licence applications and the Environment Agency through their licencing regime and Review of Consents process.
- 5.5.28 Clearly the concept of strategic forward planning of development requires local authorities to play their part in ensuring the pressures on available water resources are minimised as far as is practical, rather than relying entirely on the Environment Agency licencing regime. This is the context within which the Rushmoor Local Plan can deliver measures on its own account to supplement those avoidance strategies that will be implemented by the Environment Agency and water company as part of their wider resource planning roles. The Council seeks to do this primarily through encouraging water efficiency in new developments through the Local Plan. Policy DE4 (Sustainable Water Use) requires all new-build residential units to meet the Building Regulations optional requirement of 110 litres/person per day. New non-residential development of 1,000 sq m gross external area (GEA) is required to achieve of the BREEAM 'excellent' standard for water consumption (or any future national equivalent).
- 5.5.29 Therefore, we are able to conclude that future water resources required for the housing allocations within Rushmoor can be met without an adverse effect on European sites.

5.6 Conclusion

- 5.6.1 It can be concluded that the Rushmoor Local Plan provides a policy framework to deliver measures to avoid or mitigate the recreational, water resources and water quality effects of development on the Thursley, Ash, Pirbright & Chobham SAC and other European sites through Policy NE1 and Policy NE4.
- 5.6.2 Transport modelling and air quality analysis has been undertaken as part of the evidence to support the Local Plan. This indicates that the Local Plan will not result in likely significant effect upon the SAC in respect of air quality.

6 Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA

6.1 Introduction

6.1.1 These commons together incorporate a heath and valley mire complex. Thursley Common is a National Nature Reserve managed by Natural England and Frensham and Witley Commons are managed by the National Trust.

6.2 Features of European Interest

- 6.2.1 Thursley, Hankley and Frensham Commons Special Protection Area qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
 - During the breeding season:
 - Nightjar *Caprimulgus europaeus*: 0.6% of the breeding population in Great Britain (five-year mean, 1985-1990);
 - Woodlark *Lullula arborea*: 1.8% of the breeding population in Great Britain (count as at 1994);
 - Dartford warbler *Sylvia undata*: at least 1.3% of the breeding population in Great Britain (count as at 1984).
- 6.2.2 These species nest on or near the ground and as a result are susceptible to predation and disturbance.

6.3 Conservation Objectives

- 6.3.1 The Conservation Objectives for the European interests on the SSSI are:
 - to maintain*, in favourable condition, the habitats for the populations of Annex 1 bird species+ of European importance, with particular reference to:
 - lowland heathland
 - + Nightjar, Woodlark and Dartford Warbler
 - * maintenance implies restoration if the feature is not currently in favourable condition

6.4 Key environmental conditions

- 6.4.1 The key environmental conditions that support the features of European interest have been defined as:
 - Appropriate management
 - Management of disturbance during breeding season (March to July)
 - Minimal air pollution
 - Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
 - Maintenance of appropriate water levels
 - Maintenance of water quality

6.5 Potential effects of the Local plan

- 6.5.1 Two potential impacts of the Rushmoor Local Plan upon the SPA have been identified:
 - Recreational pressure
 - Atmospheric pollution

Recreational pressure

- 6.5.2 Aldershot lies 5km from Thursley, Hankley & Frensham Commons SPA at its closest, although most of Aldershot lies up to 9km away. Visitor surveys undertaken by UE Associates for the Whitehill/Bordon development in East Hampshire⁴² indicate that Thursley, Hankley & Frensham Commons SPA has a very variable recreational catchment, with different component sites having quite different catchments. Hankley Common (the closest part of the SPA to Rushmoor) was found to have a catchment (based on median distance travelled) of 9km. However, a simple analysis of median distance travelled does not take account of the direction from which visitors arrive or the distances from which the most intensive usage originates. The visitor survey data indicated that the majority of visitors to the European sites covered by the survey were dog walkers (58%), most of whom (68.8%) travelled by car and generally travelled less than 5km to reach the sites (67.8% of car users travelled less than 5km). Most of the remaining dog walkers travelled on foot and generally travelled less than 3km (87.9% of dog walkers travelling by foot travelled less than 3km).
- 6.5.3 Analysis indicates that 85% of all dog walkers surveyed and 70% of all visitors generally derived from within 9km of the SPA. Beyond this distance the source of origin for visitors becomes dispersed. For example, the 15% of dog walkers/groups who were covered by the survey and originated from more than 9km away were spread across an area of up to 100km from the SPA. Updated surveys were completed in 2012, which suggests that 9km remains a realistic figure adopted as the figure indicative of the 'core catchment'. It concluded that a catchment of 10km would only increase the percentage of dog walkers included by 1.7%.
- 6.5.4 This, in addition to the proximity of Aldershot to the Thames Basin Heaths, which lies immediately to the west and east of the town and the evidence from visitor surveys, would suggest that Aldershot does not contribute significantly to visitor numbers at the SPA.
- 6.5.5 The following Local Plan policies will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Thursley, Hankley & Frensham Commons SPA:
 - Policy DE6: Open Space, Sport and Recreation The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. The corollary of this is a potential reduction in recreational impacts upon the SPA.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SPA.

⁴² UE Associates. 2009. Visitor Access Patterns on European Sites surrounding Whitehill and Bordon, East Hampshire. Report to East Hampshire District Council

- **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SPA.
- Policy NE1: Thames Basin Heaths Special Protection Area Policy The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. This will include the provision of SANG which will reduce recreational impact upon the Thames Basin Heaths SPA and other European Sites within 15km of the borough.
- **Policy NE2: Green Infrastructure** The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the SPA.
- **Policy NE4: Biodiversity** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Air pollution

- 6.5.6 Development proposed within the Rushmoor Local Plan is likely to result in increased car use, notably as a consequence of additional housing and business development in the borough. Policy SS2 (Spatial Strategy) indicates that 8,300 new homes will be delivered in the period 2011-2032, with 3,850 of these homes being located at Wellesley (also known as the Aldershot Urban Extension). Policy SS2 (Spatial Strategy) also identifies the need for Rushmoor to contribute to an overall requirement for Hart, Rushmoor and Surrey Heath Functional Economic Area to accommodate 12,500 additional B class jobs by 2032. It is reasonable to assume that the increased population (both resident and workplace), in addition to any increase in the amount of retail floorspace, will lead to increased vehicle movements.
- 6.5.7 APIS (see Chapter 3) suggests that the SPA is currently experiencing deposition rates of key pollutants that exceed the critical loads for nitrogen deposition. Information on actual (i.e. measured rather than modelled) deposition rates of key pollutants at the site, along with evidence that the site is suffering as a consequence of air pollution (i.e. survey data indicating a decline in vegetative quality in line with changes in air quality), are not available but the UK Air Pollution Information System data is considered to provide a reasonable approximation.
- 6.5.8 The heathland within the SPA is known to be susceptible to adverse effects of nitrogen deposition and traffic will contribute towards that. Several major roads pass close to the SPA and pollutants from traffic may have a limited effect on parts of the site; road-generated pollutants rarely extend beyond 200m, with most being deposited closer to the road especially within denser habitats.
- 6.5.9 Transport modelling has been undertaken as part of the evidence to support the Local Plan. This has determined that there will be small increases in the traffic flows on the major roads that lie within the 200m of the SPA (Table 9 below).

Table 9: Traffic Flow increases within 200m of Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA.

	Change from Do Minimum to Do Something (2031) (AADT)
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Rushmoor Local Plan Draft Submission Habitat Regulations Assessment (June 2017)

	Vehicles	HGVs
A287	-44	0
A3	557	12
A286	-31	0
B3001	56	1

6.5.10 The Design Manual for Roads and Bridges (DMRB) states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to investigate road links further where more than a minimal increase in flows is predicated (i.e. over 100 AADT). Therefore, potential nitrogen deposition rates along one of the road links listed in Table 9 above were analysed (A3). In summary, the analysis demonstrated that the annual mean nitrogen deposition rates are expected to be very low on this road link. Further information is provided in Appendix 2.

In combination effects

- 6.5.11 The major mechanism by which 'in combination' effects could arise from the Rushmoor Local Plan is through reduced air quality as a result of traffic increases on major roads that run through surrounding local authorities and within 200m of European protected sites.
- 6.5.12 Transport and air quality modelling has been undertaken for some of the boroughs surrounding authorities as part of their spatial planning.
- 6.5.13 The HRA of the Waverley Local Plan Part 1: Strategic Policies and Sites (Presubmission Draft July 2016) identified that the all apart from one of the modelled roads was predicted to see a reduction in traffic flows over the Plan period. An increase in flows on the B3001 was identified. However, through air quality modelling the assessment has been able to conclude that no adverse effect would result.
- 6.5.14 This report stated that notwithstanding the fact that no adverse effects were expected from Local Plan growth, it was recognised that background nitrogen deposition rates were high and thus mitigation measures should be included.
- 6.5.15 Therefore, the air quality analysis in this HRA and other available HRAs indicates that the Local Plan will not result in likely significant effect upon the SPA as a result in air quality. However, it is recognised that background nitrogen deposition rates are high and thus avoidance and mitigation measures should be considered.
- 6.5.16 There are four broad types of measure available to manage emissions from road transport:
 - Behavioural measures and modal shift reducing the amount of traffic overall;
 - Traffic management modifying traffic behaviour to control where emissions are generated;

- Emissions reduction at source reducing the emissions level per vehicle; and
- Roadside barriers reducing the impact on the public of emissions.
- 6.5.17 The Local Plan contains positive policy measures that aim to improve air quality by using the measures listed above⁴³, including:
 - **Policy SS2: Spatial Strategy** states that *new development will be directed* to within the defined urban areas and that Rushmoor's hierarchy of town centre, district centre and local neighbourhood facilities will be maintained.
 - **Policy SP1: Aldershot Town Centre** includes the following elements within the strategy: 'To improve accessibility to and within the town centre by a choice of modes of transport by developing and implementing the Aldershot Town Access Plan';
 - **Policy SP2: Farnborough Town Centre** includes the following elements within the strategy: 'To enhance accessibility for all into and around the Town Centre by providing better connections between the Town Centre and the Railway Station, edge-of-centre retail developments, Farnborough Business Park, adjoining residential areas and development to the south'.
 - Policy SP3: North Camp District Centre states that 'proposals for development should demonstrate that they improve accessibility, particularly by improving linkages for cyclists and pedestrians'.
 - Policy SP4: Farnborough Airport includes among the criteria for permitting the development '*that any material increase in air pollution or odour is mitigated adequately...*'
 - **Policy SP5: Wellesley** includes the following criteria for the delivery of the Extension:
 - Includes measures to support the regeneration of Aldershot Town Centre including the provision of good pedestrian, cycle and public transport links between the new development and the town centre;
 - includes measures to provide good pedestrian and cycle links to other destinations including North Camp (District Centre and Railway Station) and relevant secondary schools;
 - Policy SP9: Aldershot Military Town includes the following criteria
 - Providing opportunities for minimising the need to travel and encouraging sustainable transport modes, particularly by maximising opportunities for access to bus routes
 - Policy SP10: Blandford House and Malta Barracks includes the following criteria
 - Appropriate provision of infrastructure to mitigate the impact of development, including transport infrastructure improvements, to enable good pedestrian and cycle links to key destinations, including Wellesley, Aldershot and Farnborough, and the creation of satisfactory road access to the development from the primary road network;

⁴³ Except for roadside barriers which is beyond the remit of local planning policy.

- Policy LN5: Neighbourhood Deprivation Strategy includes among the criteria for permitting development that it 'Increases accessibility and opportunities for walking and cycling';
- **Policy IN2: Transport** lists ten criteria to which development proposals will be subject, including:
 - Provides an appropriate on-site movement layout suitable for all potential users;
 - Provides a transport assessment and travel plan in accordance with the thresholds set out in the adopted 'Car and Cycle Parking Standards' supplementary planning document;
 - 'Takes appropriate measures to avoid adverse impact on air quality, including on European nature conservation sites.
- **Policy DE10: Pollution** the policy will prevent development that would result in pollution that poses unacceptable risks to the natural environment (which includes European sites).
- 6.5.18 It is important that there is also a mechanism established to monitor the effectiveness of the measures adopted (using the critical load/level as a monitoring target against which the success or failure of mitigation measures can be evaluated) and amend them as required.
- 6.5.19 This is in line with the precautionary principle as set out in EC Guidance⁴⁴ on its use:

'If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with the protection normally afforded to these within the European Community, the Precautionary Principle is triggered.

Decision-makers then have to determine what action to take. They should take account of the potential consequences of taking no action, the uncertainties inherent in the scientific evaluation, and they should consult interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of risk, and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.

Action is then undertaken to obtain further information enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as the scientific information remains inconclusive and the risk unacceptable'.

- 6.5.20 In order to ensure that the Council's robust measures to improve air quality across the borough are shown to be effective in terms of protection of the SPA, the Council should adopt a partnership approach to monitoring of air quality on the SPA.
- 6.5.21 The Council will seek to work with other local authorities, land managers, and strategic highway authorities to develop a framework by which air quality measures can be linked to monitoring of the air quality in the European site before and for a number of years after introduction of the measures. This will enable further measures to be devised if the air quality does not improve. In making these assessments, the critical load for the relevant habitat should be used as the target for assessment.

⁴⁴ European Commission (2000): Communication from the Commission on the use of the Precautionary Principle.

6.5.22 While not mitigation in itself, monitoring is an essential factor when dealing with an issue such as air quality, which has a high degree of uncertainty, since it will enable the effectiveness of air quality improvement measures to be evaluated and amended over the Local Plan period.

6.6 Conclusion

- 6.6.1 It can be concluded that the Rushmoor Local Plan provides a policy framework to deliver measures to avoid or mitigate the recreational effects of development on the SPA and other European sites through Policy NE1 and Policy NE4.
- 6.6.2 Transport modelling and air quality analysis has been undertaken as part of the evidence to support the Local Plan. This indicates that the Local Plan will not result in likely significant effect upon the SPA as a result in air quality.

7 Thursley & Ockley Bogs Ramsar site

7.1 Introduction

7.1.1 Thursley and Ockley Bogs is a valley mire complex that lies within Thursley, Hankley and Frensham Commons SSSI (and Thursley, Hankley and Frensham Commons SPA). The mire occurs within a matrix of heathland, where drainage is impeded, and a deep layer of peat has built up from the remains of bog-moss *Sphagnum* species, which form much of the vegetation. Several areas of open water also contribute significantly to the overall diversity of the site, ranging from acidic boggy pools and ditches to large ponds.

7.2 Features of international interest: Ramsar criteria

7.2.1 Thursley and Ockley Bogs Ramsar site qualifies under two of the nine Ramsar criteria.

Ramsar criterion	Description of Criterion	Thursley & Ockley Bogs
2	A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities.	The site supports a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.
3	A wetland should be considered internationally important if it supports populations of plant and/or animal species important for maintaining the biological diversity of a particular biogeographic region.	It is one of the few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European nightjar <i>Caprimulgus</i> <i>europaeus</i> and woodlark <i>Lullula</i> <i>arborea</i> .

Table 10: Thursley and Ockley Bogs Ramsar site criteria

7.3 Key environmental conditions

- 7.3.1 The key environmental conditions that support the features of European interest have been defined as:
 - Appropriate management
 - Managed recreational pressure
 - Minimal air pollution
 - Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
 - Maintenance of appropriate water levels
 - Maintenance of water quality

7.4 Potential effects of the plan

- 7.4.1 Two potential impacts of the Draft Rushmoor Local Plan upon the Ramsar site have been identified:
 - Recreational pressure
 - Water abstraction

7.4.2 While atmospheric nitrogen deposition could affect the site, it has been established that there are no major roads within 200m of the Ramsar site and air quality does not therefore need consideration as an impact.

Recreational pressure

- 7.4.3 Aldershot lies 7km from Thursley & Ockley Bogs at its closest, although most of Aldershot lies up to 11km away. Visitor surveys undertaken by UE Associates for the Whitehill/Bordon development in East Hampshire indicate that Thursley, Hankley & Frensham Commons had a very variable recreational catchment, with different component sites having quite different catchments. Thursley Common (which includes Thursley & Ockley Bogs) was found to have a catchment (based on median distance travelled) of 20km. However, a simple analysis of median distance travelled does not take account of the direction from which visitors arrive or the distances from which the most intensive usage originates. The visitor survey were dog walkers (58%), most of whom (68.8%) travelled by car and generally travelled less than 5km to reach the sites (67.8% of car users travelled less than 5km). Most of the remaining dog walkers travelled on foot and generally travelled less than 3km (87.9% of dog walkers travelling by foot travelled less than 3km).
- 7.4.4 In reality, it is very unlikely that recreational users from Aldershot will travel the 7-11km to Thursley Common/Thursley & Ockley Bogs to walk their dog and appreciate the heathland/bog environment in any numbers when the Thames Basin Heaths lies immediately to the west and east of the town.
- 7.4.5 The following Local Plan policies will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Thursley, and Ockley Bogs Ramsar Site:
 - Policy DE6: Open Space, Sport and Recreation The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. This will reduce recreational impacts upon the site that lies within the SPA.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the site that lies within the SPA.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SPA.
 - Policy NE1: Thames Basin Heaths Special Protection Area Policy The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. This will include the provision of SANG which will reduce recreational impact upon the Thames Basin Heaths and other European Sites within 15km of the borough.
 - **Policy NE2: Green Infrastructure** The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the site that lies within the SPA.

• **Policy NE4: Biodiversity** – The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Water resources

- 7.4.6 Development proposed within the Rushmoor Local Plan is likely to result in increased water use, notably as a consequence of housing and business development under Policy SS2 (the Spatial Strategy). The Environment Agency has previously investigated whether parts of Thursley, Hankley and Frensham Commons SSSI (including Thursley & Ockley Bogs) are being adversely affected by current levels of water abstraction in addition to studying the hydrological continuity between the major aquifer (Hythe Beds) and the minor aquifer (Folkestone Beds).
- 7.4.7 New strategic water resource options will need to be in place prior to any developments where additional abstraction impacting European sites would otherwise be required but this is provided for through Policy IN1 (Infrastructure Delivery).
- 7.4.8 Unlike most of the indirect impacts on European sites that can derive from development (e.g. from recreational pressure or vehicle exhaust emissions) and which are generally not covered by any independent assessment or consenting regime, water supply is covered by a detailed abstraction licencing and Review of Consents process controlled by the Environment Agency. One of the principal functions of this regime is to ensure that the abstraction of water at volumes, rates or times of year that would result in adverse effects on internationally designated sites do not take place.
- 7.4.9 Avoiding adverse effects on European sites as a result of increased scales of abstraction to supply new housing must therefore be principally the responsibility of the water companies through their Water Resource Management Plans, water supply operations and abstraction licence applications and the Environment Agency through their licencing regime and Review of Consents process.
- 7.4.10 Clearly the concept of strategic forward planning of development requires local authorities to play their part in ensuring the pressures on available water resources are minimised as far as is practical, rather than relying entirely on the Environment Agency licencing regime. This is the context within which the Rushmoor Local Plan can deliver measures on its own account to supplement those avoidance strategies that will be implemented by the Environment Agency and water company as part of their wider resource planning roles. The Council seeks to do this primarily through encouraging water efficiency in new developments through the Local Plan. Policy DE4 (Sustainable Water Use) requires all new-build residential units to meet the Building Regulations optional requirement of 110 litres/person per day. New non-residential development of 1,000 sq m gross external area (GEA) is required to achieve of the BREEAM 'excellent' standard for water consumption (or any future national equivalent).
- 7.4.11 Therefore, we are able to conclude that future water resources required for the housing allocations within Rushmoor can be met without an adverse effect on European sites.

7.5 Conclusion

7.5.1 It can be concluded that the Rushmoor Local Plan includes an adequate policy framework to deliver measures to avoid or mitigate the adverse effects of development on Thursley & Ockley Bogs Ramsar Site.

8 East Hampshire Hangers SAC

8.1 Introduction

- 8.1.1 The East Hampshire Hangers SAC is a large complex of predominantly broadleaved deciduous woodland comprising seven Sites of Special Scientific Interest (SSSI):
 - Upper Greensand Hangers: Wyck to Wheatley
 - Wick Wood and Worldham Hangers
 - Coombe Wood and The Lythe
 - Selborne Common
 - Noar Hill
 - Wealden Edge Hangers
 - Upper Greensand Hangers: Empshott to Hawkley

8.2 Features of European interest

- 8.2.1 The East Hampshire Hangers qualify as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:
 - Dry grasslands and scrublands on chalk or limestone, including important orchid sites: Noar Hill in particular, has an outstanding assemblage of orchids, including one of the largest UK populations of the nationally scarce musk orchid *Herminium monorchis*;
 - Beech forests on neutral to rich soils: the site is extremely rich in terms of vascular plants;
 - Mixed woodland on base-rich soils associated with rocky slopes: along with Rook Clift SAC, in the south-east of England, this habitat is only represented here;
 - Dry grasslands or scrublands on chalk or limestone (though not a primary reason for site selection);
 - Yew-dominated woodland (though not a primary reason for site selection).
- 8.2.2 Secondly, the site contains the Habitats Directive Annex II species early gentian *Gentianella anglica*, though this is not a primary reason for site selection.

8.3 Conservation Objectives

- 8.3.1 The following conservation objectives are defined for the qualifying Annex I habitats:
 - to maintain*, in favourable condition, the Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) that form the important orchid sites
 - to maintain*, in favourable condition, the Asperulo-Fagetum beech forests,
 - to maintain*, in favourable condition, the *Tilio-Acerion* forests of slopes, screes and ravines;
 - to maintain*, in favourable condition, the *Taxus baccata* woodland.

* maintenance implies restoration if the feature is not currently in favourable condition.

8.4 Key environmental conditions

- 8.4.1 The key environmental conditions that have been defined for this site are:
 - Low nutrient runoff from surrounding land being steep and narrow, the Hanger woodlands are vulnerable to nutrient run-off leading to eutrophication;
 - Maintenance of grazing;
 - Minimal air pollution nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
 - Absence of direct fertilisation; and
 - Well-drained soils.

8.5 Potential effects of the Local Plan

- 8.5.1 One potential impact of the Rushmoor Local Plan upon the SAC site has been identified:
 - Recreational pressure

Recreational pressure

- 8.5.2 Visitor surveys undertaken by UE Associates for the Whitehill/Bordon project indicate that the East Hampshire Hangers SAC has a fairly large catchment with a median distance travelled of approximately 10km. The entirety of Rushmoor lies outside this distance and therefore recreational impacts are considered unlikely.
- 8.5.3 The following polices contained within the Local Plan will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the East Hampshire Hangers SAC:
 - **Policy DE6: Open Space, Sport and Recreation** The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. This will reduce recreational impacts upon the SAC.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SAC.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SAC.
 - Policy NE1: Thames Basin Heaths Special Protection Area Policy The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. This will include the provision of SANG which will reduce recreational impact upon the Thames Basin Heaths and other European Sites within 15km of the borough.

- Policy NE2: Green Infrastructure The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the site that lies within the SAC.
- **Policy NE4: Biodiversity** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

8.6 Conclusion

8.6.1 It can be concluded that the Rushmoor Local Plan will not lead to adverse effects on East Hampshire Hangers SAC.

9 Wealden Heaths Phase II SPA

9.1 Introduction

- 9.1.1 Wealden Heaths Phase II SPA comprises four Sites of Special Scientific Interest (SSSI):
 - Devil's Punch Bowl
 - Bramshott and Ludshott Commons
 - Broxhead and Kingsley Commons
 - Woolmer Forest

9.2 Features of European interest

- 9.2.1 Wealden Heaths Phase II SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
 - During the breeding season:
 - Nightjar *Caprimulgus europaeus*: 1.3% of the breeding population in Great Britain (5-year mean, 1989-1993);
 - Woodlark *Lullula arborea:* 2.5% of the breeding population in Great Britain (1997);
 - Dartford warbler *Sylvia undata*: 1% of the breeding population in Great Britain (5-year mean, 1989-1993).

9.3 Conservation Objectives

- 9.3.1 The conservation objectives for the European interest of the SPA are:
 - to maintain⁴⁵, in favourable condition, the habitat for the populations of nightjar, woodlark and Dartford warbler with particular reference to:
 - lowland heathland

9.4 Key environmental conditions

- 9.4.1 The key environmental conditions that have been defined for this site are:
 - Appropriate management
 - Management of disturbance during breeding season (March to July)
 - Minimal air pollution
 - Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
 - Maintenance of appropriate water levels
 - Maintenance of water quality

⁴⁵ maintenance implies restoration if the feature is not currently in favourable condition.

9.5 Potential effects of the plan

- 9.5.1 Wealden Heaths Phase II SPA lies within Waverley Borough and East Hampshire Borough, with the closest element of the site 11.5km from Rushmoor Borough. Two potential impacts of the Rushmoor Local Plan upon the SPA has been identified:
 - Recreational pressure
 - Atmospheric pollution

Recreational pressure

- 9.5.2 Ground-nesting birds are vulnerable to disturbance, particularly from walkers and dogs. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs likely to be a particular problem. Several studies have demonstrated that site-specific information is required to understand the relationship between recreational use of a site and any disturbance effects.
- 9.5.3 However, the visitor surveys undertaken by UE Associates to inform the Whitehill Bordon project indicate that the recreational catchment for the Wealden Heaths Phase II SPA is relatively restricted, with the mean distance travelled for all access points that were monitored being less than 7km (and for most access points 5km or less). The entirety of Rushmoor lies outside this distance and therefore recreational impacts are considered unlikely.
- 9.5.4 The following polices contained within the Local Plan will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Wealden Heaths Phase II SPA:
 - Policy DE6: Open Space, Sport and Recreation The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. This will reduce recreational impacts within the SPA.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SPA.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SPA.
 - Policy NE1: Thames Basin Heaths Special Protection Area The purpose
 of the policy is to prohibit development that is likely to have an adverse effect
 on the integrity of the Thames Basin Heaths unless it can be avoided or
 mitigated. This will include the provision of SANG which will reduce
 recreational impact upon the Thames Basin Heaths and other European Sites
 within 15km of the borough.
 - Policy NE2: Green Infrastructure The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the site that lies within the SPA.

• **Policy NE4: Biodiversity** – The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Atmospheric pollution

- 9.5.5 Development proposed within the Rushmoor Local Plan is likely to result in increased car use, notably as a consequence of additional housing and business development in the borough. Policy SS2 (Spatial Strategy) indicates that at least 7,850 new homes will be delivered in the period 2011-2032, with 3,850 of these homes being located at Wellesley (also known as the Aldershot Urban Extension). An estimated capacity for housing which can be delivered up to 2032 is about 8,700 dwellings. Policy SS2 (Spatial Strategy) also identifies the need for Rushmoor to contribute to an overall requirement for Hart, Rushmoor and Surrey Heath Functional Economic Area to accommodate 9,000 additional B class jobs by 2032. It is reasonable to assume that the increased population (both resident and workplace), in addition to any increase in the amount of retail floorspace, will lead to increased vehicle movements.
- 9.5.6 When coupled with the scale of residential development proposed in the remaining Boroughs that adjoin the Heaths⁴⁶, there is an even greater likelihood of a substantial increase in traffic movements on the major roads that bisect the components of the two European sites that lie within the Borough.
- 9.5.7 APIS (see Chapter 3) suggests that the SPA is currently experiencing deposition rates of key pollutants that exceed the critical loads for nitrogen deposition. Information on actual (i.e. measured rather than modelled) deposition rates of key pollutants at the site, along with evidence that the site is suffering as a consequence of air pollution (i.e. survey data indicating a decline in vegetative quality in line with changes in air quality), are not available but the UK Air Pollution Information System data is considered to provide a reasonable approximation.
- 9.5.8 The heathland habitat is known to be susceptible to adverse effects of nitrogen deposition and traffic will contribute towards that. Several major roads pass close to the SPA and pollutants from traffic may have a limited effect on parts of the site; road-generated pollutants rarely extend beyond 200m, with most being deposited closer to the road especially within denser habitats.
- 9.5.9 Transport modelling has been undertaken as part of the evidence to support the Local Plan. This has determined that there will be increases in the traffic flows on the A3 (Table 11 below).

Major Road within 200m	Change from Do Minimum to Do Something (2031) (AADT)	
	Vehicles	HGVs
A3	557	12
A325	-155	-17

Table 11: Traffic Flow increases within 200m of Wealden Heaths Phase II SPA.

⁴⁶ Windsor & Maidenhead, Wokingham, Bracknell Forest, Basingstoke & Dean, Hart, Guildford, Surrey Heath, Elmbridge, Mole Valley, Runnymede and Woking

A287	-44	0

9.5.10 The Design Manual for Roads and Bridges (DMRB) states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to investigate road links further where more than a minimal increase in flows is predicated (i.e. over 100 AADT). Therefore, potential nitrogen deposition rates along one of the road links listed in Table 10 above were analysed (A3). In summary, the analysis demonstrates that the annual mean nitrogen deposition rates are expected to be very low on this road link. Further information is provided in Appendix 2.

In combination effects

- 9.5.11 The major mechanism by which 'in combination' effects could arise from the Rushmoor Local Plan is through reduced air quality as a result of traffic increases on major roads that run through surrounding local authorities and within 200m of European protected sites. Transport and air quality modelling has been undertaken for some of the boroughs surrounding authorities as part of their spatial planning.
- 9.5.12 The HRA of the Waverley Local Plan Part 1: Strategic Policies and Sites (Presubmission Draft July 2016) identified that the modelled road links in proximity to the Wealden Heaths Phase II SPA) will experience a reduction in AADT in comparison to the DM due to transport interventions associated with Local Plan delivery, and as such the change in traffic levels will be a positive one that would not result in likely significant effects.
- 9.5.13 Therefore, the air quality analysis in this HRA and other available HRAs indicates that the Local Plan will not result in likely significant effect upon the SPA as a result in air quality. However, it is recognised that background nitrogen deposition rates are high and thus avoidance and mitigation measures should be considered.
- 9.5.14 There are four broad types of measure available to manage emissions from road transport:
 - Behavioural measures and modal shift reducing the amount of traffic overall;
 - Traffic management modifying traffic behaviour to control where emissions are generated;
 - Emissions reduction at source reducing the emissions level per vehicle; and
 - Roadside barriers reducing the impact on the public of emissions.
- 9.5.15 The Local Plan contains positive policy measures that aim to improve air quality by using the measures listed above⁴⁷, including:
 - **Policy SS2: Spatial Strategy** states that *new development will be directed* to within the defined urban areas and that Rushmoor's hierarchy of town centre, district centre and local neighbourhood facilities will be maintained.
 - **Policy SP1: Aldershot Town Centre** includes the following elements within the strategy: '*To improve accessibility to and within the town centre by a*

⁴⁷ Except for roadside barriers which is beyond the remit of local planning policy.

choice of modes of transport by developing and implementing the Aldershot Town Access Plan';

- **Policy SP2: Farnborough Town Centre** includes the following elements within the strategy: 'To enhance accessibility for all into and around the Town Centre by providing better connections between the Town Centre and the Railway Station, edge-of-centre retail developments, Farnborough Business Park, adjoining residential areas and development to the south'.
- Policy SP3: North Camp District Centre states that 'proposals for development should demonstrate that they improve accessibility, particularly by improving linkages for cyclists and pedestrians'.
- **Policy SP4: Farnborough Airport** includes among the criteria for permitting the development '*that any material increase in air pollution or odour is mitigated adequately…*'
- **Policy SP5: Wellesley** includes the following criteria for the delivery of the Extension:
 - 'Includes measures to support the regeneration of Aldershot Town Centre including the provision of good pedestrian, cycle and public transport links between the new development and the town centre;
 - includes measures to provide good pedestrian and cycle links to other destinations including North Camp (District Centre and Railway Station) and relevant secondary schools;
- Policy SP9: Aldershot Military Town includes the following criteria
 - Providing opportunities for minimising the need to travel and encouraging sustainable transport modes, particularly by maximising opportunities for access to bus routes
- Policy SP10: Blandford House and Malta Barracks includes the following criteria
 - Appropriate provision of infrastructure to mitigate the impact of development, including transport infrastructure improvements, to enable good pedestrian and cycle links to key destinations, including Wellesley, Aldershot and Farnborough, and the creation of satisfactory road access to the development from the primary road network;
- Policy LN5: Neighbourhood Deprivation Strategy includes among the criteria for permitting development that it 'Increases accessibility and opportunities for walking and cycling';
- **Policy IN2: Transport** lists ten criteria to which development proposals will be subject, including:
 - Provides an appropriate on-site movement layout suitable for all potential users;
 - Provides a transport assessment and travel plan in accordance with the thresholds set out in the adopted 'Car and Cycle Parking Standards' supplementary planning document;
 - 'Takes appropriate measures to avoid adverse impact on air quality, including on European nature conservation sites.

- **Policy DE10: Pollution** the policy will prevent development that would result in pollution that poses unacceptable risks to the natural environment (which includes European sites).
- 9.5.16 In addition to requiring new development within 5km of the SPA to demonstrate avoidance or mitigation of any potential adverse effects (which could include reduced air quality), Policy NE1 includes a requirement for new development to contribute toward Strategic Access Management and Monitoring measures. One function of access management and monitoring should be to avoid damage to the SPA through atmospheric pollution.
- 9.5.17 It is important that there is also a mechanism established to monitor the effectiveness of the measures adopted (using the critical load/level as a monitoring target against which the success or failure of mitigation measures can be evaluated) and amend them as required.
- 9.5.18 This is in line with the precautionary principle as set out in EC Guidance⁴⁸ on its use:

'If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with the protection normally afforded to these within the European Community, the Precautionary Principle is triggered.

Decision-makers then have to determine what action to take. They should take account of the potential consequences of taking no action, the uncertainties inherent in the scientific evaluation, and they should consult interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of risk, and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.

Action is then undertaken to obtain further information enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as the scientific information remains inconclusive and the risk unacceptable'.

- 9.5.19 In order to ensure that the Council's robust measures to improve air quality across the borough are shown to be effective in terms of protection of the SPA, the Council should adopt a partnership approach to monitoring of air quality on the SPA.
- 9.5.20 The Council will seek to work with other local authorities, land managers, and strategic highway authorities to develop a framework by which air quality measures can be linked to monitoring of the air quality in the European site before and for a number of years after introduction of the measures. This will enable further measures to be devised if the air quality does not improve. In making these assessments, the critical load for the relevant habitat should be used as the target for assessment.
- 9.5.21 While not mitigation in itself, monitoring is an essential factor when dealing with an issue such as air quality, which has a high degree of uncertainty, since it will enable the effectiveness of air quality improvement measures to be evaluated and amended over the Local Plan period.

⁴⁸ European Commission (2000): Communication from the Commission on the use of the Precautionary Principle.

Rushmoor Local Plan Draft Submission Habitat Regulations Assessment (June 2017)

9.6 Conclusion

9.6.1 It can therefore be concluded that the Rushmoor Local Plan will not lead to adverse effects on the Wealden Heaths Phase II SPA.

10 Shortheath Common SAC

10.1 Introduction

10.1.1 The focal point of the Shortheath Common SAC is the valley mire with a mesotrophic area to the north and oligotrophic mire to the south. The site also encompasses areas of heath and woodland. The high cover of cranberry *Vaccinium oxycoccus* on the site is notable.

10.2 Features of European interest

- 10.2.1 Shortheath Common qualifies as a SAC for its habitats. The site contains the Habitats Directive Annex I habitats of:
 - Transition mires and quaking bogs, the very wet mires are often identified by an unstable 'quaking' surface: this habitat forms the focal point of the SAC.
 - European dry heaths (though not a primary reason for site selection)
 - Bog woodland (though not a primary reason for site selection)

10.3 Conservation Objectives

- 10.3.1 The following conservation objectives are defined for the qualifying Annex I habitats:
 - to maintain*, in favourable condition, the transition mires and quaking bogs
 - to maintain*, in favourable condition, the dry heaths.
 - to maintain*, in favourable condition, the bog woodland.

* maintenance implies restoration if the feature is not currently in favourable condition.

10.4 Key environmental conditions

- 10.4.1 The key environmental conditions that have been defined for this site are:
 - Careful management of water levels;
 - Good air quality;
 - Adequate management;
 - Low levels of recreational pressure

10.5 Potential effects of the plan

- 10.5.1 All types of terrestrial European site can be affected by trampling which in turn causes erosion. The SAC lies approximately 13.5km from the southern boundary of Rushmoor Borough. One potential impact of the Rushmoor Local Plan upon the SAC has been identified:
 - Recreational pressure

Recreational pressure

10.5.2 Visitor surveys of Shortheath Common SAC undertaken for the Whitehill/Bordon project by UE Associates indicate that the recreational catchment for the Common is relatively restricted, with the median travel distance being less than 5km. The entirety

of Rushmoor lies outside this distance and therefore recreational impacts are considered unlikely.

- 10.5.3 The following polices contained within the Local Plan will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Shortheath Commons SAC:
 - Policy DE6: Open Space, Sport and Recreation The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. This will reduce recreational impacts upon the SAC.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SAC.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SAC.
 - Policy NE1: Thames Basin Heaths Special Protection Area The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. This will include the provision of SANG which will reduce recreational impact upon the Thames Basin Heaths and other European Sites within 15km of the borough.
 - Policy NE2: Green Infrastructure The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the site that lies within the SAC.
 - Policy NE4: Biodiversity The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs

10.6 Conclusion

10.6.1 It can therefore be concluded that the Rushmoor Local Plan will not lead to adverse effects on Shortheath Common SAC.

11 Windsor Forest & Great Park SAC

11.1 Introduction

11.1.1 The Windsor Forest and Great Park SAC covers over 1,680 ha with 95% of the site consisting of broadleaved deciduous woodland and the largest number of veteran oak trees in Britain. The site is important for its rich fungal assemblages and for its diversity of saproxylic invertebrates (including many rare species), for some of which it is the only known site in the UK.

11.2 Features of European interest

- 11.2.1 Windsor Forest and Great Park qualifies as a SAC for its habitats and species. The site contains the Habitats Directive Annex I habitats of:
 - Old acidophilous oak woods with Quercus rober on sandy plains.
 - Atlantic acidophilous beech forests with *llex* and sometimes also *Taxus* in the shrub layer (though not a primary reason for site selection)
- 11.2.2 The site contains the Habitats Directive Annex 2 species of:
 - Violet click beetle *Limoniscus violaceus*, for which it is thought to support the largest population in the UK.

11.3 Conservation Objectives

- 11.3.1 The following conservation objectives are defined for the qualifying Annex I habitats:
 - to maintain*, in favourable condition, the Old acidophilous oak woods with *Quercus rober* on sandy plains.
 - to maintain*, in favourable condition, the Atlantic acidophilous beech forests with *llex* and sometimes *Taxus* in the shrub layer.
- 11.3.2 The following conservation objectives are defined for the qualifying Annex 2 species:
 - to maintain* in favourable condition, the habitats for the population of the Annex 2 violet click beetle, with particular reference to decaying timber and ancient trees.

* maintenance implies restoration if the feature is not currently in favourable condition.

11.4 Key environmental conditions

- 11.4.1 The key environmental conditions that have been defined for this site are:
 - Minimal atmospheric pollution may increase the susceptibility of beech trees to disease and alter epiphytic (lichen) communities.
 - Managed public access (site is already heavily accessed; extensive public access may compromise ability to retain falling timber associated with old trees).
 - Appropriate management.

11.5 Potential effects of the plan

11.5.1 All types of terrestrial European site can be affected by trampling which in turn causes erosion. The SAC lies approximately 14km from the boundary of Rushmoor Borough. One potential impact of the Rushmoor Local Plan upon the SAC has been identified:

Recreational Pressure

- 11.5.2 All types of terrestrial European site, including woodlands, can be affected by trampling which in turn causes erosion. The Natura 2000 data sheet for the site indicates that the internationally important features of the site are more vulnerable to inappropriate management and damage/loss to veteran trees rather than recreational activity. A survey carried out in 1998 identified that visitors tend to live about five miles (8km) away on average⁴⁹. Therefore, Rushmoor is outside the recreational catchment for this site, being approximately 14km from the site.
- 11.5.3 The following polices contained within the Local Plan will provide an adequate policy framework to avoid or mitigate the likelihood of significant adverse recreational pressure on the Windsor Forest and Great Park SAC:
 - **Policy DE6: Open Space, Sport and Recreation** The policy seeks to ensure the provision of quality open space and recreational areas by maintaining and improving provision. This will reduce recreational impacts upon the SAC.
 - **Policy DE7: Playing Fields and Ancillary Facilities** The policy seeks to protect and enhance playing fields and their ancillary facilities in the borough, which could reduce recreational impacts upon the SAC.
 - **Policy DE8: Indoor Sport and Recreation Facilities** The policy seeks to safeguard, enhance and enable the delivery of new indoor sports and recreation facilities, which could reduce recreational impacts upon the SAC.
 - Policy NE1: Thames Basin Heaths Special Protection Area The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated. This will include the provision of SANG which will reduce recreational impact upon the Thames Basin Heaths and other European Sites within 15km of the borough.
 - Policy NE2: Green Infrastructure The purpose of the policy is to provide a network of accessible, multifunctional green infrastructure across the borough, which could reduce recreational impacts upon the site that lies within the SAC.
 - **Policy NE4: Biodiversity** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs

11.6 Conclusion

11.6.1 It can be concluded that the Rushmoor Local Plan will not lead to adverse effects on Windsor Forest & Great Park SAC.

⁴⁹ Bellringer, A. & Gillam, S. (1998) Forest Visitor Surveys – 1994 and Earlier Years. Forestry Commission

12 Overall conclusions

- 12.1.1 The Local Plan has been subject to a HRA to determine if there are Policies that could lead to significant effects on eight European sites, including three Special Protections Areas (SPAs), four Special Areas of Conservation (SACs) and a RAMSAR site.
- 12.1.2 The majority of the policies contained within the Rushmoor Local Plan were screened out as being not likely to lead to significant adverse effects on European sites.
- 12.1.3 It has been identified that the following policies could not, prior to mitigation, be screened out due to potential effects on European Sites:
 - SS2 Spatial Strategy
 - SP1 Aldershot Town Centre
 - SP1.3 Westgate
 - SP1.4 The Galleries
 - SP1.5 Union Street East
 - SP1.6 Hippodrome House / Victoria Road
 - SP1.7 Westgate Phase II
 - SP1.8 Aldershot Railway Station and Surrounds
 - SP2 Farnborough Town Centre
 - SP2.3 Farnborough Civic Quarter
 - SP4.5 AAIB/RAIB
 - SP5 Wellesley
 - SP6 The Crescent
 - SP7 Meudon House/ 115-117 Pinehurst
 - SP8 Land at 68-70 Hawley Lane
 - SP10 Blandford House and Malta Barracks
 - DE5 Proposals Affecting Existing Residential (C3) Uses
 - DE11 Development on Residential Gardens
 - LN3.1 Peabody Road Car Park
 - LN3.2 Land at Hawley Lane South, Farnborough
 - LN8 Public Houses
 - PC1 Economic Growth and Investment
 - PC2 Strategic Employment Sites
 - PC3 Locally Important Employment Sites
 - PC4 Farnborough Business Park
 - PC5 Cody Technology Park
 - PC6 East Aldershot Industrial Cluster
 - PC7 Hawley Lane South
- 12.1.4 In carrying out an HRA, it is important to determine the various ways in which land use plans can have an impact on European sites, by following the pathways along which development can be connected with European sites. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon a European site. This report has considered five pathways of impact:
 - Urbanisation
 - Recreational pressure
 - Atmospheric pollution
 - Water Quality
 - Water Abstraction

Urbanisation

- 12.1.5 The following Local Plan policies will provide an adequate policy framework to avoid or mitigate the likelihood of significant effect from increased urbanisation on the Thames Basin Heaths SPA:
 - NE1: Thames Basin Heaths Special Protection Area The purpose of the policy is to prohibit development that is likely to have an adverse effect on the integrity of the Thames Basin Heaths unless it can be avoided or mitigated.
 - **NE4: Biodiversity** The policy seeks to maintain and enhance the borough's biodiversity and makes specific reference to enhancing and managing the nature conservation value of SACs, SPAs and SSSIs.

Recreational Pressure

- 12.1.6 The following policies provide mitigation for effects of increased recreational pressure on European Sites, specifically the Thames Basin Heaths SPA:
 - Policy DE6: Open Space, Sport and Recreation
 - Policy DE7: Playing Fields and Ancillary Facilities
 - Policy DE8: Indoor Sport and Recreation Facilities
 - Policy NE1: Thames Basin Heaths Special Protection Area Policy
 - Policy NE2: Green Infrastructure
 - Policy NE4: Biodiversity
- 12.1.7 The Council will need to monitor the availability of SANG provision at the appropriate rate to provide mitigation for the development proposed through the Local Plan. If there is insufficient land available to increase the provision of SANGs by the appropriate quantum the Council will continue to work with Natural England and adjacent authorities to ensure that appropriate SANGS can be provided outside Rushmoor Borough.

Atmospheric Pollution

- 12.1.8 The Council will seek to work with other local authorities, land managers, and strategic highway authorities to develop a framework by which air quality measures can be linked to monitoring of the air quality in the European site before and for a number of years after introduction of the measures. This will enable further measures to be devised if the air quality does not improve. In making these assessments, the critical load for the relevant habitat should be used as the target for assessment.
- 12.1.9 Transport evidence has been prepared to support the Local Plan, using an evidence based Land Use and Transport Interaction model which was commissioned by Hampshire County Council to produce the North Hampshire Transport Model Suite (NHTM). The Annual Average Daily Traffic (AADT) for the link roads listed in Section 4 have been modelled and this identifies the change in flows between the Do Minimum and Do Something scenarios on roads within 200m of internationally designated sites.
- 12.1.10 This transport modelling has identified some small increases in the traffic flows on the two major roads that lie within the 200m of European Sites. The Design Manual for Roads and Bridges states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to investigate road links further where more than a minimal increase in flows is predicated (i.e. over 100 AADT). Therefore, potential nitrogen

deposition rates along four road links were analysed (A325, A323, A3 and B311). In summary, the annual mean nitrogen deposition rates are expected to be very low on these road links. Further information is provided in Appendix 2.

12.1.11 It is also important to note that the Local Plan contains positive policy measures to help maintain good air quality by encouraging sustainable travel. In addition, Policy DE10 (Pollution) will prevent development that would result in pollution that poses unacceptable risks to the natural environment (which includes European sites).

Water Abstraction

- 12.1.12 Water abstraction was identified as a likely significant effect for two of the European Sites Assessed as part of this study; the Thursley, Ash, Pirbright and Cobham SAC and Thursley & Ockley Bogs Ramsar Site.
- 12.1.13 We understand that the Environment Agency considers that it will be possible for water companies to meet the future water resource requirements for the Rushmoor area without increased abstractions from watercourses and groundwater that are of importance to Thursley, Ash, Pirbright and Chobham SAC. Therefore, there are no likely significant effects on this site resulting from development proposed in the Rushmoor Local Plan.
- 12.1.14 In contrast, the Environment Agency has previously investigated whether parts of Thursley, Hankley and Frensham Commons SSSI (including Thursley & Ockley Bogs) are being adversely affected by current levels of water abstraction. New strategic water resource options will need to be in place prior to any developments where additional abstraction impacting European sites would otherwise be required.
- 12.1.15 It is concluded that avoiding adverse effects on European sites as a result of increased scales of abstraction to supply new development is principally the responsibility of the water companies through their Water Resource Management Plans, water supply operations and abstraction licence applications and the Environment Agency through their licencing regime and Review of Consents process.
- 12.1.16 However, the following policies provide mitigation for effects of water abstraction on European Sites:
 - Policy IN1: Infrastructure and Community Facilities acknowledges that need for infrastructure to support new development in the borough.
 - Policy DE4: Sustainable Water Use requires new residential developments to meet the Building Regulations optional requirement of 110 litres/person/day to reduce the impacts of new development upon water abstraction. New nonresidential development of 1,000 sq m gross external area (GEA) is required to achieve BREEAM 'excellent' standard for water consumption (or any future national equivalent).
- 12.1.17 We can therefore conclude that future water resources required for the housing allocations within Rushmoor can be met without an adverse effect on European sites.

Water Quality

- 12.1.18 This study has identified that all development within Rushmoor Development within Rushmoor falls into the catchments of three Waste Water Treatment Works (WwTWs): Camp Farm, Aldershot and Camberley.
- 12.1.19 A Joint Water Cycle Study (WCS) for Rushmoor, Hart and Surrey Heath has been prepared. The WCS includes an ecological appraisal, and this identified a need for

water quality modelling to take place. The water quality modelling identified the designated wildlife sites with pathways linking to WwTWs. The Thames Basin Heaths SPA was identified as being located in proximity to a waterbody that receives discharge from the Hartley Wintney and Fleet WwTWs. As noted above, planned development in Rushmoor will not be within the catchment of either of these WwTWs.

12.1.20 The only other internationally important wildlife site that is geographically close to the WCS area is Thursley, Ash, and Pirbright & Chobham SAC. This internationally designated site does not receive surface water from the watercourses linked to the modelled WwTWs, and its features for designation are not sensitive to changes in water quality that could be associated with the six WwTWs modelled.

Appendix 1 – Screening the Rushmoor Local Plan policies

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
SS1 – Presumption in Favour of Sustainable Development	 When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (or its successor), whilst having regard to the need to assess, and where appropriate mitigate against, the likelihood of significant effect on the Thames Basin Heaths Special Protection Area. It will work pro-actively with applicants to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Rushmoor Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise, taking into account whether: a. There are available and deliverable avoidance and mitigation measures in respect of the Thames Basin Heaths Special Protection Area; and b. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework indicate that development should be restricted. 	No HRA implications. This policy reflects the position of the NPPF in the presumption in favour of sustainable development. However, there is a caveat with respect to 'material considerations', which in the context of the NPPF includes 'protection of European sites'. There are no impact pathways present.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
SS2– Spatial Strategy	In order to deliver sustainable growth, the Council will permit development which is consistent with the following broad spatial framework for the scale and location of development: New development will be directed to within the defined urban areas as shown on the Policies Map. In the countryside surrounding Aldershot and Farnborough, new development will be strictly limited in line with Policy NE4.	Potential HRA implications. The estimated capacity for housing which can be delivered up to 2032, of about 8,700 dwellings, is sufficient to meet the objectively assessed need for 7,848 dwellings identified in the SHMA.
	Residential DevelopmentOver the period 2014 to 2032, the Council will ensure that, subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heaths Special Protection Area, provision is made for the delivery of at least 7,850 new dwellings in the Borough. This will be provided as follows:About 3,850 new homes at Wellesley, Aldershot.At least 4,000 new homes from the remainder of the urban area, with:• About 1,700 of these from within Aldershot (outside Wellesley); and• About 2,300 of these from within Farnborough.	The delivery of these net new dwellings will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on European Sites, specifically the Thames Basin Heaths SPA, since the entire borough of Rushmoor lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance and Mitigation Strategy requires mitigation to be applied to avoid such effects.
	Employment The Borough's Strategic and Locally Important Employment Sites will be protected and supported for employment uses, as set out in Policies PC1, PC2 and PC3, to ensure that the employment land needs of the Borough and wider Hart, Rushmoor and Surrey Heath functional economic area (FEA) can be met. These sites will contribute to meeting the forecast increase in the total number of B-class jobs of around 9,000 in the	The development of net new housing, retail and employment opportunities at the borough's established employment sites has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality at European

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	FEA over the Plan period. Development in Farnborough, which is designated as a 'Growth Town' within the wider Enterprise M3 Sci:Tech corridor, will make a significant contribution towards meeting this growth.	Sites, specifically the TBH SPA where it lies within 200m of major roads (such as the A325 Farnborough Road).
	Town Centre Uses Rushmoor's hierarchy of town centres, district centre and local neighbourhood facilities will be maintained and enhanced by encouraging a range of uses, consistent with the scale and function of the centres. In particular:	The above effects also apply to the SPA outside Rushmoor, where leisure or business journeys could affect European Sites (specifically the TBHSPA) beyond the borough boundaries.
	 a. Town centre uses will be located within Aldershot and Farnborough town centres to support their vitality, viability and regeneration, in line with Policies SP1 and SP2; b. New retail development must protect or enhance the vitality and viability of the town centres, district centre and local neighbourhood facilities; 	Similarly, development in Rushmoor must be considered in the context of development in surrounding local authorities, where development pressure may also apply to European Sites.
	c. Retail development will be focused in Aldershot and Farnborough town centres, within the primary shopping areas. If such sites are not suitable, available and viable, locations for retail development will be assessed sequentially, in accordance with national policy;	
	 North Camp will be protected and enhanced as a district centre, providing for local needs and specialist retail uses, in line with Policy SP3; and 	
	 e. The retail and local service function of local neighbourhood facilities, as defined in Policy LN6 and on the Policies Map, will be protected to provide for local day-to-day needs. 	

Rushmoor Local Plan Draft Submission Habitat Regulations Assessment (June 2017)

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
Shaping Places		
SP1 – Aldershot Town Centre	 Development proposals will be permitted that maintain or enhance the vitality and viability of Aldershot Town Centre and which contribute to the strategy of regeneration. To create a thriving, accessible and regenerated Aldershot Town Centre, the strategy is: a. To support uses contributing towards a family-focused town centre and capitalising on the opportunities provided by Wellesley; b. To concentrate development for leisure, entertainment, cultural, tourism, retail, supporting services, restaurants and other town centre uses within the Town Centre; c. To improve further the town's evening economy by supporting leisure development, entertainment and cultural facilities, and family restaurants focused around the leisure core of Westgate; d. To develop and protect a robust retail core in a tightly defined primary shopping area by directing retail uses to that area of the Town Centre; e. To accommodate future retail growth, which improves the health, vitality and viability of the Town Centre, prioritising the reuse and redevelopment of vacant floorspace; f. To work proactively in partnership to help to reduce the number of vacant units; g. To encourage linked trips by improving and maintaining pedestrian routes 	Potential HRA implications. The development of net new residential, retail and leisure provision and employment opportunities with Aldershot Town Centre has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality at European Sites, specifically the on the Thames Basin Heaths SPA where it lies within 200m of major roads (such as the A325 Farnborough Road). The above effects also apply to European Sites outside Rushmoor, where additional retail, leisure or business journeys could affect the European Sites, specifically the TBHSPA beyond the borough boundaries. The delivery of net new dwellings within Aldershot Town Centre will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance at

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 between Westgate and the primary shopping area; h. To improve accessibility to and within the Town Centre by a choice of modes of transport by implementing the Aldershot Town Access Plan; i. To support the development of good-quality urban homes that contribute to the vitality of the Town Centre, including residential uses above ground floor level in the primary shopping area and on development sites within and around the Town Centre; j. To support the development of offices suitable for local businesses outside the primary shopping area; k. To support development that demonstrates good design and creates a more attractive Town Centre environment reinforcing the town's historic built heritage and local character; l. To improve the public realm through investment in environmental improvements and continued frequent street cleaning; and m. To support town centre management initiatives, including working in partnership with businesses, the local community, landowners, developers and other agencies to improve the Town Centre and to promote it as the preferred leisure and shopping destination for local residents. 	European Sites, specifically the Thames Basin Heaths SPA, since the Town Centre lies within the 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance and Mitigation Strategy requires mitigation to be applied to avoid such effects.
SP1.1 - Primary Frontages in Aldershot Town Centre	Within the primary shopping frontages in Aldershot Town Centre, development will be permitted that satisfies the following criteria: a. It maintains or enhances the Centre's vitality and viability;	No HRA implications. The policy is concerned with protecting Aldershot's primary shopping frontages.

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	 b. It is for a use falling within Class A1, A2, A3, A4 or A5 and retains an active frontage; c. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 25% in the Wellington Centre and 30% in Union Street and Wellington Street; d. It would not result in the loss of an A1 unit frontage on a visually prominent site; e. There would be no material adverse impact upon the appearance of the premises; and f. There would be no material adverse impact upon the amenities of nearby residential uses. 	There are no impact pathways present.
SP1.2 - Secondary Frontages in Aldershot Town Centre	 Within the secondary shopping frontages in Aldershot Town Centre, development will be permitted that satisfies the following criteria: a. It maintains or enhances the Centre's vitality and viability; b. It is for a town centre use which retains an active frontage; c. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 50%, unless A1 use is considered to be no longer viable and there is evidence of effective marketing for a period of at least 12 months; d. It would not result in the loss of an A1 unit frontage on a visually prominent site; e. In each frontage, no more than 5% of the units will be betting shops and no 	No HRA implications. The policy is concerned with protecting Aldershot's secondary shopping frontages. There are no impact pathways present.

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	 betting shop is located within 400 m of the proposal site; f. There would be no material adverse impact upon the appearance of the premises; and g. There would be no material adverse impact upon the amenities of nearby residential uses. 	
SP1.3 - Westgate	Westgate, comprising the cinema, hotel and restaurants, is allocated as a leisure hub. The function of Westgate as a leisure hub will be protected. Within this area, development will be permitted for leisure, entertainment, cultural, hotel and restaurant uses that contribute to the vitality and viability of the Town Centre.	Potential HRA implications. The development of a new leisure hub provision at this location has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality at European Sites, specifically the Thames Basin Heaths SPA where it lies within 200m of major roads (such as the A325 Farnborough Road). The above effects also apply to the European Sites outside of Rushmoor, where additional leisure journeys could affect European Sites, beyond the borough boundaries.
SP1.4 - The Galleries	The Council will work proactively with developers to achieve a comprehensive redevelopment of the site as set out below. It is anticipated that at least 500 residential	Potential HRA implications. The development of net new residential and

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	 units can be provided in total across the three phases. Phase 1 - The Galleries (short-term) Proposals will: a. Enhance retail provision along Wellington Street (primary frontage) and High Street (secondary frontage) and provide new frontage on to a public space 	retail provision at this site within Aldershot Town Centre has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality at European Sites, specifically the Thames Basin Heaths SPA where it lies within 200m of major roads (such as the A325 Farnborough
	 focused on the area currently known as Little Wellington Street; b. Provide a new public space of an appropriate size to accommodate civic/community events; c. Deliver improved connectivity at ground floor level between High Street and Wellington Street via the new public space; 	Road). The above effects also apply to the European Sites outside Rushmoor, where additional retail, leisure or business journeys could affect the European Sites beyond the borough boundaries.
	 d. Provide residential development in the form of a mix of 1/2/3-bedroom units (subject to viability) on upper floors, seeking to make best use of the south-facing elevation; and e. Provide public car parking provision, accessed via Station Road, of a minimum of 250 spaces to offset the proposed loss of the High Street multi-storey car park. The delivery of these spaces will be a prerequisite to Phase 2 being implemented. 	The delivery of net new dwellings at this Town Centre site will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance at European Sites, specifically the Thames Basin Heaths SPA, since the Town
	 f. Provide affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing) Phase 2 - High Street Multi-Storey Car Park (short-term) 	Centre lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.

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	Proposals will:	
	 Provide residential development in the form of a mix of 1/2/3-bedroom units (subject to viability) and should seek to make best use of the south-facing elevation; 	
	 Provide affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing) 	
	c. Make best use of the gateway opportunity presented off the Naafi Roundabout in respect of the design of new buildings. It may be acceptable to depart from established building heights in order to create a focal point at this location; and	
	d. Reinforce existing linkages from the north of the town through Court Road and into the Town Centre.	
	Phase 3 - The Arcade (medium-term)	
	Proposals will:	
	a. Enhance retail provision along Wellington Street (secondary frontage) and provide new active frontage onto the public space delivered as part of Phase 1;	
	b. Respect the setting of 30 Wellington Street; and	
	c. Provide residential development in the form of a mix of 1/2/3-bedroom units (subject to viability).	
	 Provide affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing) 	

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	Contemporary materials and articulate designs will be welcome as part of the scheme in order to create an engaging and attractive part of the Town Centre. The redevelopment proposals will be required to contribute towards the creation of a high-quality public space network within the Town Centre with an improved sense of place and a focus for community and civic activity. Mature tree planting and other landscaping will be required to assist the greening of the Town Centre. Proposals should deliver a high-quality, distinctive built form. As such, it may be acceptable to depart from established building lines and heights in order to create focal points.	
SP1.5 - Union Street East	 The Council will work proactively with developers to bring forward the redevelopment and refurbishment of the Union Street East site. Proposals will: a. deliver at least 130 residential units on the upper floors of the development; b. provide affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing); c. enhance an important gateway into the Town Centre from the Wellesley development in the north; d. retain and reconfigure existing buildings of architectural value on the site to bring forward positive Town Centre uses; e. enhance the visual heritage value of the upper floors. Active ground floor uses will reflect the primary/secondary frontage designations.	Potential HRA implications. The promotion of net new residential uses at this Town Centre site will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on European Sites, specifically the Thames Basin Heaths SPA, since Aldershot Town Centre lies within the 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.

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SP1.6 - Hippodrome House	The Council will support a comprehensive refurbishment scheme that improves significantly the external appearance of Hippodrome House, a prominent building in Aldershot Town Centre. Ground floor uses should continue to reflect the town centre designation, with an active mix of retail, restaurants and other A-class uses. Upper floors have the potential to provide residential accommodation in a sustainable town centre location. Development proposals along the frontage of Birchett Road should respect the scale and massing of the surrounding townscape, noting that Hippodrome House is an exception rather than a precedent for an appropriate scale of development.	Potential HRA implications. The promotion of net new residential uses at this Town Centre site will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on European Sites, specifically the Thames Basin Heaths SPA, since Aldershot Town Centre lies within the 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.
SP1.7 - Westgate Phase	The Council will work proactively with developers of Westgate Phase II to bring forward a comprehensive redevelopment scheme that will reinforce the established evening economy role within this part of Aldershot. A revamped theatre building (either new build or renovation) will provide the anchor for the redevelopment fronting Princes Gardens, with a high-quality residential development embracing Wellington Avenue and the corner of Princes Way. Given the prominence of the site, there is scope for a scale of development of up to 4/5 storeys to create a positive visual impact. Appropriate servicing for the theatre auditorium will also need to be incorporated into the final scheme. Contemporary materials and articulate designs will be welcomed as part of the scheme in order to create an engaging and attractive part of the Town Centre.	Potential HRA implications. The development of a net new leisure use and residential units at this location has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the European Sites, specifically the Thames Basin Heaths SPA where it lies within 200m of major roads (such as the A325 Farnborough Road). The above effects also apply to the European

Rushmoor Local Plan Draft Submission Habitat Regulations Assessment (June 2017)

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
		sites outside Rushmoor, where additional leisure journeys could affect the SPA beyond the borough boundaries. The delivery of net new residential uses at this Town Centre site will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the European Sites, specifically the Thames Basin Heaths SPA, since Aldershot Town Centre lies within the 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.
SP1.8 - Aldershot Railway Station and Surrounds	 Aldershot Railway Station forecourt will be reconfigured to create an improved transport interchange and a welcoming entrance into the Town Centre for those travelling by train. Subject to appropriate re-provision, the existing Bus Station site will be utilised for: a. residential development of approximately 30 units; b. the delivery of affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing) 	Potential HRA implications. The delivery of net new residential uses at this Town Centre site will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since Aldershot Town Centre lies within the 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy

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	 c. provision of ancillary retail uses at ground floor level. The redevelopment of Penmark/Progress House for residential use will be supported. 	requires mitigation to be applied to avoid such effects.
SP2 – Farnborough Town Centre	Development proposals will be permitted that maintain or enhance the vitality and viability of Farnborough Town Centre and which contribute to the strategy of revitalising the Town Centre.	Potential HRA implications. The development of net new residential, retail
	 To achieve revitalisation, the strategy for Farnborough Town Centre is: a. For the Town Centre to be the focus for development for retail, leisure, entertainment, cultural, tourism, restaurant, supporting service and other town centre uses, building on the successful investment in the Town Centre; 	and leisure provision and employment opportunities within Farnborough Town Centre has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on European sites, specifically the Thames Basin
	 b. To develop and protect a robust retail core in the primary shopping area by supporting the concentration of retail uses in this area; c. To accommodate future retail growth capacity, which improves the health, vitality, viability and retail attractiveness of the Town Centre; 	Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA outside Rushmoor, where additional retail,
	 To facilitate linked trips between edge-of-centre retail development and the primary shopping area; 	leisure or business journeys could affect the European Sites beyond the borough boundaries.
	 e. To improve the evening economy by supporting new leisure uses, entertainment and cultural uses, together with family restaurants, cafés and bars, particularly within Kingsmead in support of the cinema; f. To support the development of good-quality housing that contributes to the vitality of the Town Centre, including residential uses above ground floor level in the primary shopping area and on development sites within and around the 	The delivery of additional dwellings within Farnborough Town Centre will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive

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	 Town Centre; g. To support the development of offices outside the primary shopping area; h. To enhance accessibility for all into and around the Town Centre by providing better connections between the Town Centre and the Railway Station, edge-of-centre retail developments, Farnborough Business Park, adjoining residential areas and development to the south; i. To integrate development in the Civic Quarter into the Town Centre; and j. To promote good design quality and to develop a high-quality network of streets and public spaces. 	recreational pressure and disturbance on the Thames Basin Heaths SPA, since the Town Centre lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.
SP2.1 - Primary Frontages in Farnborough Town Centre	 Within the primary shopping frontages in Farnborough Town Centre, development will be permitted that satisfies the following criteria: a. It maintains or enhances the Centre's vitality or viability; b. It is for a use falling within Class A1, A2, A3, A4, or A5 and retains an active frontage; c. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 20%; d. It would not result in the loss of an A1 unit frontage on a visually prominent site; e. There would be no material adverse impact upon the appearance of the premises; and 	No HRA implications. The policy is concerned with protecting Farnborough's primary shopping frontages. There are no impact pathways present.

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	 f. There would be no material adverse impact upon the amenities of nearby residential uses. 	
SP2.2 - Secondary Frontages in Farnborough Town Centre	 Within the secondary shopping frontages in Farnborough Town Centre, development will be permitted that satisfies the following criteria: a) It maintains or enhances the Town Centre's vitality or viability; b) It is for a town centre use which retains an active frontage; c) In the Queensmead and Briarcliff House frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 50%; d) In the Kingsmead frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 50%, unless the proposed use is for Class A3; e) It would not result in the loss of an A1 unit frontage on a visually prominent site; f) In each frontage, no more than 5% of the units would be betting shops and no betting shop is located within 400 m of the proposal site; g) There would be no material adverse impact upon the appearance of the premises; and h) There would be no material adverse impact upon the amenities of nearby residential uses. 	No HRA implications. The policy is concerned with protecting Farnborough's secondary shopping frontages. There are no impact pathways present.

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SP2.3 - Farnborough Civic Quarter	 The Council will work with landowners, developers, transport operators and public sector agencies to secure a comprehensive redevelopment of the Farnborough Civic Quarter. This will be achieved through the following principles: a) The creation of a unified Civic Quarter with a strong new identity; b) Improved provision of community/civic/leisure uses incorporating the reprovision of space for existing community/civic/leisure uses within the site; c) Appropriate phasing of the redevelopment of the site to ensure continuity for existing community uses within the site; d) An enhanced central green space which can be used for informal/formal events and activities; e) Active ground floor uses that integrate with the central green space; f) High-density residential development of approximately 700 units at a scale and layout that is appropriate to a town centre location, making effective and efficient use of land; g) The delivery of affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing); h) Delivery of improved pedestrian and cycle links between the Town Centre (Queensmead), Farnborough Business Park and development areas to the south; i) A high-quality distinctive built form that includes the introduction of focal, 	Potential HRA implications. The delivery of net additional dwellings within Farnborough Town Centre will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the Town Centre lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 gateway buildings on to Sulzers Roundabout and Pinehurst Roundabout; and j) Car parking provision in accordance with the Council's adopted parking standards. 	
SP3 – North Camp District Centre	 Development proposals will be permitted which maintain or enhance the vitality and viability of North Camp District Centre by preserving its local and specialist retail functions and vibrant evening economy. The Council will support the retention of: a. Retail uses and restaurants; b. Local community uses; and c. Car parking facilities. Proposals for development should demonstrate that they improve accessibility, particularly by improving linkages for cyclists and pedestrians. The Council will continue to work in partnership with the local community and other partners to support and enhance the role of North Camp District Centre. 	No HRA implications. The policy is concerned with protecting North Camp district centre and maintaining the diverse offer available at this location. There are no impact pathways present.
SP3.1 - North Camp District Centre Primary	Within the primary shopping frontage in North Camp District Centre, development will be permitted that satisfies the following criteria:	No HRA implications. The policy is concerned with protecting North

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Shopping Frontage	 a. It maintains or enhances the Centre's vitality and viability; b. It is for a use falling within A1, A2, A3, A4 or A5 and retains an active frontage; c. A change of use from A1 will not result in the number of non-A1 units exceeding 40%; d. It would not result in the loss of an A1 unit frontage on a visually prominent site; e. The proposal would maintain or enhance the appearance of the premises; and f. There would be no material adverse impact upon the amenities of nearby residential uses. 	Camp District Centre's primary shopping frontage. There are no impact pathways present.
SP3.2 - North Camp District Centre Secondary Shopping Frontage	 Within the secondary shopping frontage in North Camp District Centre, development will be permitted that satisfies the following criteria: a. It maintains or enhances the Centre's vitality or viability; b. It is for a town centre use which retains an active frontage; c. In each frontage, a change of use from A1 will not result in the number of non-A1 units exceeding 50%; d. It would not result in the loss of an A1 unit frontage on a visually prominent site; e. In each frontage, no more than 5% of the units would be betting shops or pay-day loan shops and no betting shop or pay-day loan shop is located within 400 	No HRA implications. The policy is concerned with protecting North Camp District Centre's secondary shopping frontage. There are no impact pathways present.

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	metres of the proposal site;f. The proposal would maintain or enhance the appearance of the premises; andg. There would be no material adverse impact upon the amenities of nearby	
SP4 - Farnborough Airport	residential uses. Within the defined Farnborough Airport Planning Policy Boundary (APPB), as identified on the Policies Map, development will be restricted to that supporting business aviation and associated Airport-related uses.	Increased aviation movements over and above the currently consented position of
	In respect of business aviation movements, the planning permission of 2010 allows up to a maximum of 50,000 annual Air Traffic Movements, of which no more than 8,900 are at weekends and bank holidays ⁵⁰ . Proposals to change the pattern, nature and/or number of business aviation movements will only be permitted provided that the following criteria are met ⁵¹ :	50,000 business movements per year by 2019 from Farnborough airport could potentially lead to an adverse impact on the Thames Basin Heaths SPA, which is located close to the airport boundaries. However, this policy clearly states in criteria g that proposals to
	 That the need for a change in business aviation movements at Farnborough Airport is demonstrated; 	change the pattern, number or nature of movements will only be permitted provided that there is no adverse impact on
	b. That the aircraft noise impact is less than the agreed baseline noise level ⁵² , established through Policy SP4.2;	international, national and local nature conservation designations'.
	c. That the extent of any annual third-party risk contour resulting from any change does not result in a net increase in the area covered by the third-party risk	Since the Thames Basin Heaths is covered by the national and international designation this

⁵⁰ See planning permission, reference 09/00313/REVPP ⁵¹ The 'pattern, nature and/or number' of business aviation movements refers to any application to change these from the consented position, whether this be, for example, an amendment to the overall number of movements, an adjustment to the mix of or weight of aircraft operating from the Airport, or a change to the hours of operation. Any changes that relate to the 'pattern, nature and/or number' of business aviation movements will therefore be required to satisfy the criteria set out in Policy SP4.

⁵² Effectively the noise contour budget

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	 contour; d. That any material increase in air pollution or odour is mitigated adequately; e. That economic benefits to the local and wider economy can be demonstrated; f. That flying at the most sensitive times of the day and week is limited to respect the amenities of residents in and adjoining Rushmoor Borough; g. That there is no adverse impact on international, national and local nature conservation designations; and h. That impacts of any changes on surface water run-off are managed adequately. 	policy prohibits any increase in flights unless it can be demonstrated that there will be no adverse effects on the Thames Basin Heaths. Coupled with the tests set out in the Conservation of Habitats & Species Regulations 2010, which any application for an increase in flights will need to meet, it is considered that this policy can be screened out.
SP4.1 - Type of Flying	 The Council will permit proposals for flying at Farnborough Airport in connection with business aviation⁵³. Proposals will not be permitted for: a. Bulk freight services⁵⁴; b. Scheduled passenger services; c. 'Inclusive tour' charter flying; 	No HRA implications. The policy is concerned with the types of flying that can be undertaken at Farnborough Airport as opposed to the quantum of movements.

⁵³ For the purpose of this policy, business aviation is defined as flying activities and operations that are dedicated to the needs of companies, individuals and organisations, which require a premium-priced service for a high-degree of mobility, a high standard of service and flexibility, and privacy in aviation services. To be clear, business aviation excludes such activity in connection with the Airshow, bulk freight services and 'inclusive tour' charter flying. No training or recreational flying (other than recreational flying by the DERA flying club or essential familiarisation, training and flying checks by aviation crew) shall take place

⁵⁴ Bulk freight is defined as a weight of 100 kilograms or more in any one aircraft movement. This excludes racehorses. The current legal agreement in place permits no more than 100 aircraft movements a year involving the transportation of racehorses.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 d. Any increase in recreational flying above that allowed by the lawful use;⁵⁵. or e. A transition to a full range of flying facilities. 	There are no impact pathways present.
SP4.2 - Noise, and Flying at Weekends and Bank Holidays	 The noise contour budget arising from aircraft movements at Farnborough Airport, excluding 'Other Aviation Activity'⁵⁶, shall not exceed an area within the annual agreed noise contour budget, defined by the total land within both the 55 dB(A) L_{eq} contour (being 6.6 km²) and the total land within the 60 dB(A) L_{eq} contour (being 2.4 km²) up to 2032, or the extent of any replacement agreed noise contour budget established through the implementation of this policy. On receipt of any planning application to change the pattern, nature and/or number of business aviation movements, the noise contour budget will be remodelled to account for any changes⁵⁷ in noise modelling software or operational procedures in place, and these revised contours shall form the new agreed baseline noise level/contour budget against which the impact of any proposed changes to business aviation movements will be assessed. The outcome of each remodelling will become the new agreed noise contour budget. Proposals to change the pattern, nature and/or number of annual business aviation movements will only be acceptable if they: a. Lead to a noise contour budget smaller than the agreed noise contour budget determined as current at the time of the application for change; 	No HRA implications. The policy is concerned with controlling the number of business aviation flight movements at Farnborough Airport that can be undertaken at weekends and bank holidays. There are no impact pathways present.

⁵⁵ The DERA flying club has a lawful use for up to 2,500 recreational flight movements per year ⁵⁶ 'Other Aviation Activity' (OAA) means levels of aviation activity excluding business aviation; OAA includes flying at and associated with the Airshow, flying by the DERA flying club or similar successor club, military operations, and the arrival and departure by aircraft of diplomatic persons or official missions.

⁵⁷ Changes to include any update or revision of the INM aircraft noise prediction software or changes in the operating procedures at the Airport, including any airspace change around the Airport, modelled alongside the proposed changes to the pattern, nature and/or number of business aviation movements.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 b. Set an overall annual maximum movement limit; c. Set a maximum noise level for business aviation aircraft using the Airport; and d. Maintain the same differential movement limit between weekday and weekends and bank holidays so that the proportion of weekend and bank holiday movements will not exceed 18% of the total overall maximum annual flight movement limit, excluding 'Other Aviation Activity'. 	
SP4.3 - Hours of Operation	 The Council will permit civil business aviation aircraft movements at Farnborough Airport between the hours of: a. 07:00 and 22:00 on weekdays; and b. 08:00 and 20:00 at weekends and bank holidays. Except in an emergency, there shall be no civil business aviation aircraft movements at any other times and at no times on Christmas Day or Boxing Day. Aircraft maintenance and servicing activity at the Airport with the potential to generate noise at a level that would have an adverse impact on neighbouring sensitive uses will not be permitted within the Airport Planning Policy Boundary between the hours of: a. 22:00 and 07:00 on weekdays; and b. 20:00 and 08:00 at weekends and Bank Holidays. 	No HRA implications. The policy is concerned with Farnborough Airport's hours of operation. There are no impact pathways present.
SP4.4 - Safety	Proposals to change the pattern, nature and/or number of business aviation	No HRA implications.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 movements will only be permitted provided that: a. The 1:10,000 per annum risk contour at either end of runway 06/24 does not extend to areas where people live, work or congregate, or beyond the area at the eastern end of the runway defined by the Farnborough Airport Planning Policy Boundary as set out on the Policies Map; and b. The consequences of any change should not exceed the maximum extent of the 1:100,000 per annum annual risk contour, being the area covered by this contour as defined in the 2010 appeal decision associated with 09/00313/REVPP. 	The policy is concerned with the safety of business aviation movements at the airport. Therefore, this policy can be screened out. See screening decision on SP4 relating to changes to pattern, nature and number of movements.
SP4.5 - AAIB/RAIB	 Proposals for development at the AAIB and RAIB site for specialist transport accident investigation purposes will be considered flexibly, with the following criteria relevant to their determination: a. That the need for such proposals in this location is demonstrated. b. That any proposals can be appropriately screened to minimise their visual impact. c. That any impacts on the local highway network are mitigated appropriately. d. That the proposal would result in positive outcomes in terms of the management of the SINC. 	Potential HRA implications. A specialist transport accident investigation facility already exists on this site. Any increase in activity over the consented position has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. However, the potential impacts of the development will depend upon the scale and level of full time employment at the facility.

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SP5 – Wellesley	Land to the north of Aldershot Town Centre is identified for a sustainable, well-designed residential-led, mixed-use development. The Council will work with partners to continue to deliver development which meets the following criteria: a. Phased delivery of about 3,850 homes between 2015 and 2032 in accordance with the approved masterplan for the area; b. A minimum of 35% of residential units to be provided as affordable housing; c. Phased delivery of social, physical and community infrastructure to include two new primary schools, pre-school facilities, community centre, health facilities, waste water infrastructure, open space and recreational facilities, allotments and waste facilities; d. Measures to avoid and mitigate any impact of development upon the Thames Basin Heaths Special Protection Area, including the provision of Suitable Alternative Natural Greenspace, and Strategic Access Management and Monitoring measures; e. Small-scale local employment opportunities; f. The provision of a local neighbourhood centre to include community uses and small-scale local retail, service, and food and drink facilities within a mix of small units within Use Classes A1, A2, A3, A4 and A5; g. Transport infrastructure improvements identified through the detailed Transport Assessment submitted with planning application 12/00958/OUT, or as amended; h. High-quality urban design reflecting the parameters of design codes agreed as part of application 12/00958/OUT, or as amended; i. Includes measures to support the regeneration of Aldershot Town Centre, including	Potential HRA implications. The delivery of 3,850 dwellings at Wellesley will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the Wellesley site lies within the 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects. Criterion d of the policy requires that the development provides measures to avoid and mitigate any impact of development upon the Thames Basin Heaths Special Protection Area including the provision of Suitable Alternative Natural Greenspace, and Strategic Access Management and Monitoring measures. The development of net new residential, retail and employment opportunities with the Wellesley development has the potential to lead to increased road journeys within the Borouch and therefore potentially reduced air
	i. Includes measures to support the regeneration of Aldershot Town Centre, including	Borough and therefore potentially reduced air

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	 the provision of good pedestrian, cycle and public transport links between the new development and the Town Centre; j. Includes measures to provide good pedestrian and cycle links to other destinations, including North Camp (District Centre and Railway Station) and relevant secondary schools; k. Has regard to the character of the Aldershot Military Town and Basingstoke Canal conservation areas, and provides for the retention and improvement of heritage assets, including listed buildings and monuments, with priority to be given to the appropriate reuse of the Cambridge Military Hospital; and l. Measures to demonstrate adaptation and mitigation to climate change, including: a) Efficient design and layout; b) The provision of on-site renewable energy; c) Water efficiency measures; d) Integration of Sustainable Drainage Systems; e) Design and initiatives which encourage the use of non-car modes for travel, including the use of Travel Plans; and 	 quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA outside Rushmoor, where additional retail, leisure or business journeys could affect the SPA beyond the borough boundaries. However, Criteria i. and j. require measures to improve accessibility by non-car modes to local facilities and services at Aldershot Town Centre and North Camp District Centre.
SP6 – The Crescent	 f) Sustainable construction techniques and energy efficiency measures. The Council will work with partners to grant planning permission for a comprehensive redevelopment which provides: 	Potential HRA implications. The delivery of 150 net new dwellings at The

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	 a) Approximately 150 residential units, subject to further analysis and more detailed feasibility work; b) The delivery of affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing) c) An appropriate mix of housing that reflects the findings of the most up-to-date SHMA; and d) Where applicable, appropriate provision of social, physical and community infrastructure in accordance with other policies of the Local Plan to mitigate the impact of development. 	Crescent will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since The Crescent site lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects. The development of net new residential development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads.
SP7 - Meudon House /115-117 Pinehurst	 Land at Meudon House/115-117 Pinehurst in Farnborough is allocated for sustainable, residential development. The Council will work with partners to grant planning permission for a comprehensive redevelopment which provides: a. Approximately 300 residential units, subject to further analysis and more detailed feasibility work; b. The delivery of affordable housing in accordance with the requirements of Policy LN2 (Affordable Housing); c. An appropriate mix of housing that reflects the findings of the most up-to-date 	Potential HRA implications. The delivery of approximately 300 net new dwellings at Meudon House/115-117 Pinehurst will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since Meudon House site lies within

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	 SHMA; d. A layout that seeks to retain established landscaping to Meudon Avenue; e. Pedestrian links to adjacent developments to the north and south of the site; f. A layout that does not prejudice the potential redevelopment of the Council Offices site at a later date; and g. Where applicable, appropriate provision of social, physical and community infrastructure in accordance with other policies of the Local Plan to mitigate the impact of development. 	5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects. The development of net new residential development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads.
SP8 – Land at 68-70 Hawley Lane	 Land at Hawley Lane, on the site of the former Camberley Rubber Mouldings site, and adjoining former Methodist Church, as identified on the Policies Map, is allocated for redevelopment for a residential or a mixed residential and community use. Proposals for development will be acceptable subject to: a. Comprehensive delivery of a mixed-use residential and community use; or b. Solely residential redevelopment, subject to assessment of the loss of the community use against Policy IN1; and c. Delivery of industrial uses on the Hawley Lane South site, to ensure that there is no net loss of employment land; d. An appropriate site layout which addresses satisfactorily the relationship 	Potential HRA implications. The delivery of net new residential units or mixed residential units and community uses at the site will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the site lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be

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	 between the adjoining land uses; e. An appropriate mix of housing that reflects the findings of the most up-to-date SHMA, proportionate to the scale of the site; f. Provision of safe access on to the highway network; g. Provision of on-site car and cycle parking to meet the adopted standards; and h. Where applicable, appropriate provision of social, physical and community infrastructure in accordance with other policies of the Local Plan to mitigate the impact of development 	applied to avoid such effects. The development of net new residential development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads.
SP9 - Aldershot Military Town	 The Council will work with the Ministry of Defence and other partners, as appropriate, to permit development subject, where relevant, to meeting the following: a. Consistency with the role as a Garrison and the need to meet its operational requirements; b. Supporting the use of the resettlement centre for the development of skills required for local employment sectors; c. Protecting the open character of land at, and adjoining, Queen's Parade; d. Providing opportunities for minimising the need to travel and encouraging sustainable transport modes, particularly by maximising opportunities for access to bus routes; e. Ensuring that appropriate transport mitigation is in place, as identified through a 	No HRA implications. The policy is concerned with Council's approach to development proposals to support the Military Town. There are no impact pathways present.

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	 transport assessment; f. Supporting the integration of military and civilian personnel; and g. Ensuring that any new development enhances the character of the Aldershot Military Town and Basingstoke Canal conservation areas, and that heritage assets are retained and enhanced. 	
SP10 – Blandford House and Malta Barracks	 Land to the west of the A325 at Blandford House and Malta Barracks, as identified on the Policies Map, is allocated for a sustainable residential development and Suitable Alternative Natural Green Space (SANG). The Council will work with partners to deliver development which meets the following criteria: a. Development of approximately 150 residential homes focused on areas of previously developed land at Blandford House and Malta Barracks, using design principles which respect, and mitigate the impact on, the site's countryside setting; 	Potential HRA implications. The delivery of 150 net new dwellings at Blandford House and Malta Barracks will lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the
	 b. Provision of about 14 hectares of SANG to support housing delivery in the Borough; c. A minimum of 35% of residential units to be delivered as affordable housing, subject to viability; d. A target of 5% of homes to be provided through the provision of serviced plots 	Blandford House and Malta Barracks site lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.
	 e. Appropriate provision of infrastructure to mitigate the impact of development, including transport infrastructure improvements, to enable good pedestrian and cycle links to key destinations, including Wellesley, Aldershot and 	The site is allocated for residential development and Suitable Alternative Natural Greenspace (SANG). Criterion b of the policy requires that the development provides measures to avoid and mitigate any impact of

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	 Farnborough, and the creation of satisfactory road access to the development from the primary road network; f. Measures to avoid and mitigate the impact of development upon the Thames Basin Heaths Special Protection Area, including the provision of SANG on adjacent land, and supporting Strategic Access Management and Monitoring measures; g. High-quality design which reflects the sylvan setting of the residential development; h. Appropriate design to conserve and enhance the locally listed buildings and their setting; and i. Retention of significant trees, and provision of replacement trees and landscaping, to mitigate the visual impact of the development on the surrounding countryside. 	development upon the Thames Basin Heaths Special Protection Area through the provision of Suitable Alternative Natural Greenspace. The development of net new residential, retail and employment opportunities with the Wellesley development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads.
Delivering Infrastructure		
IN1 – Infrastructure and Community Facilities	The Council will work with partners to ensure that infrastructure and community facilities, including those set out in the Rushmoor Infrastructure Plan, are provided in a timely and sustainable manner.	No HRA implications. The policy is concerned with the retention and provision of community facilities and
	 Development will be permitted provided the following criteria are met: a. Development includes the provision of, or makes reasonable contributions towards providing, necessary community facilities, open space, transport infrastructure and other infrastructure to address the needs arising from the 	provision of community facilities and infrastructure to support development in the borough. The provision of community facilities to

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	 proposal, including the cumulative impacts of development; b. Major development schemes proposed to drain to Camberley Wastewater Treatment Works will be required to consult with the Environment Agency and Thames Water at an early stage to ensure that the development can be accommodated either within the limits of capacity at the Wastewater Treatment Works or by sufficient additional capacity being made available, and that the water quality requirements of the Water Framework Directive will not be compromised; c. Development seeks to maximise the capacity and efficiency of existing infrastructure; d. New community facilities and infrastructure are located and designed so that they are accessible to all and compatible with the character and needs of the local community; e. New community facilities are well served and linked by public transport and easily accessible by walking and cycling; f. It can be demonstrated that opportunities for the dual use of community and recreational facilities have been explored; g. The phasing and delivery of infrastructure has been agreed by the Council in partnership with relevant partners; and h. There is no loss or reduction in capacity of existing infrastructure, including community facilities, unless: 	support new development can increase travel by non-car modes, which in turn can reduce pollution associated with vehicle movements. There are no impact pathways present.
	a. replacement services or facilities are provided on site or within the	

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	vicinity which meet the need of the local population; or b. necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in local provision; and c. it has been clearly demonstrated that there is no need for the facility or demand for another community use on site. The financial viability of developments will be considered when determining the extent and priority of infrastructure requirements.	
IN2 – Transport	 Development should seek to minimise the need to travel, promote opportunities for sustainable transport modes, and improve accessibility to local facilities and linkages with the surrounding pedestrian and cycle network. Development will be permitted that: a. Integrates into existing movement networks b. Provides safe, suitable and convenient access for all potential users c. Provides an appropriate on-site movement layout suitable for all potential users d. Provides appropriate parking provision, in terms of amount, design and layout, in accordance with the adopted 'Car and Cycle Parking Standards' Supplementary Planning Document e. Provides appropriate waste and recycling storage areas and accessible collection points for refuse vehicles 	The policy encourages minimising the need to travel by promoting opportunities for sustainable transport modes. Criterion j) of the policy requires development proposals to take appropriate measures to avoid adverse impact on air quality, including on European Nature Conservation Sites In addition, Criterion h) requires the provision of a Travel Plan where the appropriate threshold is met.

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	 f. Does not have a severe impact on the operation, safety or accessibility to the local or strategic road networks g. Mitigates impacts on the local or strategic road networks, arising from the development itself and/or the cumulative effects of development, through the provision of, or contributions towards, necessary and relevant transport improvements, including those secured by legal agreements or through the Community Infrastructure Levy h. Provides a transport assessment and travel plan in accordance with the thresholds set out in the adopted 'Car and Cycle Parking Standards' Supplementary Planning Document i. Ensures that all development proposals provide a co-ordinated and comprehensive scheme that does not prejudice the future development or design of suitable adjoining sites; and j. Takes appropriate measures to avoid adverse impact on air quality, including on European nature conservation sites 	
IN3 – Telecommunications	New development will be expected to provide for appropriate telecommunications provision, including for high-speed broadband. Telecommunications development will be permitted subject to the provision of evidence to demonstrate that significant adverse impact on residential amenity, visual amenity, heritage assets and the character or appearance of the surrounding area has been avoided or minimised by: a. Exploring possibility of sharing sites and facilities; b. Considering long-term requirements, where appropriate, in order to minimise	No HRA implications. The policy is concerned with the delivery of telecommunications infrastructure to support development in the borough. There are no impact pathways present.

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	further works; c. Selecting a location and siting within the site which is the least visually intrusive; and d. Using all available technological solutions to reduce visual impact.	
Creating High Quality an	d Distinctive Environments	
HE1 - Heritage	 The Council will seek to conserve and enhance the historic environment, including heritage assets, particularly where they are recognised as having an intrinsic link to the military or aviation history of the Borough. Development proposals should seek opportunities, where possible, to enhance the historic environment. Proposals will be assessed by reference to the significance of the asset. Substantial loss of, or harm to, nationally important sites, or military or aviation heritage assets, should only be considered in wholly exceptional circumstances. Proposals which affect, or have the potential to affect, heritage assets will provide a heritage statement which: a. Describes the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal; and b. Sets out the impact of the development on the heritage assets and a suggested 	No HRA implications. The policy is concerned with conservation and enhancement of heritage assets in the borough. There are no impact pathways present.

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	 mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and present heritage assets, as well as recording loss and advancing knowledge. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision. 		
HE2 - Demolition of a Heritage Asset	 The demolition or partial demolition of a heritage asset, particularly those with an intrinsic link to the aviation or military history of the Borough, will not be permitted unless every practical effort has been made to retain it. The more significant the asset, the greater the weight applied, and demolition of nationally important assets should be wholly exceptional. In particular the Council will consider: a. The condition of the building/structure and the cost of repair and maintenance in relation to its importance and value derived from its continued use; b. The adequacy of efforts to retain the building/structure in use; and c. Whether demolition is necessary to achieve substantial public benefits. 	No HRA implications. The policy is concerned with the approach to be taken if planning consent is required for the demolition or partial demolition of a Heritage Asset in the borough. There are no impact pathways present.	
HE3 - Development within Conservation Areas	When considering development proposals within or adjoining a conservation area, the Council will seek to conserve, enhance or better reveal: a. Significant views/buildings;	No HRA implications. The policy is concerned with the approach to be taken for developments within	

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	b. Areas of townscape quality;	Conservation Areas.
	c. Important built features such as chimneys, roof lines, and open areas or natural features, all of which can be an essential part of the character and appearance of the heritage asset.	There are no impact pathways present.
	Proposals which would have a detrimental effect on such features will not normally be permitted. Conservation area character appraisals/management plans will help provide the basis for the identification of such features.	
	Where permission is required for signage or advertisements, it is important that the design, materials, colour, illumination and positioning are appropriate in relation to the building and the conservation area.	
	Basingstoke Canal Conservation Area	
	The Council will not permit development adjoining, over, or under the Basingstoke Canal conservation area which:	
	a. Would adversely affect the Canal's landscape, ecological and historical character; or	
	b. Would detract from the visual character or enjoyment of the Canal through the creation of noise, fumes, smoke or effluents.	
HE4 - Archaeology	The Council will support development proposals, which do not adversely affect nationally significant features of archaeological or historic importance or their setting.	No HRA implications.
	Where such features of archaeological or historic importance or their settings are affected, the development should seek to conserve and, where possible, enhance	The policy is concerned with the approach to be taken for developments that could

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	them. If there is evidence that archaeological remains may exist but the extent and significance are unknown, the Council will require developers to undertake an archaeological impact assessment. Where it is subsequently identified that there are significant archaeological remains, these should normally be preserved in situ. Where the Council concludes that preservation in situ is not justified, it will seek, prior to the development, appropriate provision for the excavation, recording and public presentation of remains.	adversely affect nationally significant features of archaeological or historic importance. There are no impact pathways present.
DE1 – Design in the Built Environment	 New development will be required to make a positive contribution towards improving the quality of the built environment. It will: a. Include high-quality design that respects the character and appearance of the local area; b. Promote designs and layouts which take account of the need to adapt to and mitigate against the effects of climate change, including the use of renewable energy; c. Respect established building lines; d. Take account of adjacent building heights, fenestration, roof and cornice lines; e. Use materials sympathetic to local character; f. Give consideration to the introduction of contemporary materials that respect or enhance existing built form; g. Include a level of architectural detail that gives the building visual interest for 	No HRA implications. The policy is concerned with the approach to be taken to ensure that new development makes a positive contribution toward improving the quality of the built environment. There are no impact pathways present.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 views both near and far; h. Make a positive contribution to the public realm – facing the street, animating it and ensuring that all open space within the curtilage of the site is positively used and managed; i. Where appropriate, ensure that existing landscape features (for example, topography (the surface shape) and trees worthy of retention) are included within the overall design of the scheme from an early stage; j. Consider biodiversity at an early stage of the design, to allow for the identification of opportunities for enhancement. k. Give appropriate consideration to the relationship between public and private space; l. Have regard to the relevant character appraisal if proposing development within a conservation area; and m. Demonstrate, through a supporting design and access statement,⁵⁸ that the wider, existing context has been factored into the proposals through analysis of the following: a. Surrounding uses; b. Scale; c. Massing; 	

⁵⁸ Applies only to 'major development', as defined in Article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2010, but excluding engineering and mining operations and waste development.

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	 d. Layout; e. Landscape (setting of development); f. Materials; g. Orientation; and h. Topography n. All development proposals will demonstrate how they will incorporate sustainable construction standards and techniques. Major commercial developments over 1,000 sq m gross floorspace will be required to meet BREEAM 'very good' standard overall (or any future national equivalent) and BREEAM 'excellent' standard for water consumption. 	
DE2 – Residential Space Standards	Where planning permission is required, proposals for new residential units (including change of use or conversions) will ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers. The Council will assess all development proposals against the following minimum standards:Number of Bedrooms (b)Number of Bed Spaces (persons)1-Storey Dwellings2-Storey Dwellings3-Storey DwellingsBuilt-In Storage591b1p39 (37)601.01b2p5058-1.5	No HRA implications. The policy is concerned with the residential space standards that will apply to new developments in the borough. There are no impact pathways present.

⁵⁹ Built-in storage areas are included within the overall GIA and include an allowance of 0.5 square metres for fixed services or equipment, such as a hot-water cyclinder, boiler or heat exchanger.

⁶⁰ Where a 1b 1p has a shower room instead of a bathroom, the floor area may be reduced from 39 square metres to 37 square metres, as shown bracketed.

Policy number/ name						Screening Decision (green = screened out, amber = screened in for appropriate assessment)	
		3р	61	70	-		
	2b	4p	70	79	-	2.0	
		4p	74	84	90		
		5р	86	93	99		
	3b	6р	95	102	108	2.5	
		5р	90	97	103		
		6р	99	106	112		
		7р	108	115	121		
	4b	8p	117	124	130	3.0	
		6р	103	110	116		
		7р	112	119	125		
	5b	8p	121	128	134	3.5	
		7р	116	123	129		
	6b	8p	125	132	138	4.0	
	a. A dwe bedro b. In ord 7.5 so c. In ord of at lo d. One c	I space standards a	ore bedspaces edspace, a sin .15 m wide; edspaces, a do oom) is at leas	e following: has at least o gle bedroom puble (or twin	one double (c has a floor ar bedroom) ha	rea of at least s a floor area	

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 e. Any area with a headroom of less than 1.5 m is not counted within the gross internal area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1.0 sq m within the gross internal area); f. Any other area that is used solely for storage and has a headroom of 900-1500 mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900 mm is not counted at all; g. A built-in wardrobe counts towards the gross internal area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. A built-in area in excess of 0.72 sq m in a double bedroom and 0.36 sq m in a single bedroom counts towards the built-in storage requirement; and h. The minimum floor to ceiling height is 2.3 m for at least 75% of the gross internal area. 	
DE3 - Residential Private Amenity Standards	Where planning permission is required, all new residential development and conversions will be required to provide good-quality, useable private outdoor space in the form of gardens, balconies, and/or roof terraces. The minimum requirement for private outdoor space is a 5 sq m balcony within flatted development accessible from the main habitable room and a 15 sq m garden for 1-2	No HRA implications. The policy is concerned with the residential private amenity standards that will apply to new developments in the borough.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	person dwellings in the form of houses. A garden space of a minimum of 30 sq m will be required for family housing (two-bedroom residential units and above). ⁶¹ Where buildings utilise roofs to provide private outdoor amenity space, the proposal should take into consideration issues of design, overlooking and crime prevention. Use of roofs for amenity purposes will need to be balanced with the use for green roofs and renewable energy equipment through careful design, which integrates the benefits for amenity, biodiversity and carbon reduction.	There are no impact pathways present.
	Where practicable, all new residential developments and residential conversions should provide step-free access and a level threshold from homes to private outdoor space. The minimum depth and width of all balconies and other private external spaces is expected to be 1500 mm. ⁶²	
	In exceptional circumstances, where site conditions make it impossible to provide private open space for all dwellings, additional internal living space equivalent to the private open space requirement will added to the minimum GIA of the dwelling, as outlined in Policy DE2.In exceptional circumstances, where site conditions make it impossible to provide private open space for all dwellings, additional internal living space equivalent to the private open space for all dwellings.	

⁶¹ Based on the furniture, access and activity requirements of the Homes and Communities Agency's (HCA) legacy Housing Quality Indicators (Version 4, 2007), and drying space and private open space requirements of the Department for Communities and Local Government's (DCLG) 'Code for Sustainable Homes' Technical Guide (2009, ENE4 and HEA3).

⁶² Based on English Partnership's 'Quality Standards: Delivering Quality Places' (2007), the furniture, access and activity requirements of the HCA's legacy Housing Quality Indicators (Version 4, 2007), and drying space and private open space requirements of the DCLG's 'Code for Sustainable Homes' Technical Guide (2009).

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	and the minimum combined living area of the dwelling as outlined in policy D2.	
DE4 – Sustainable Water Use	All new homes are required to meet the water efficiency standard of 110 litres/person/day, to be achieved by compliance with the Building Regulations New non-residential development of 1,000 sq m gross external area (GEA) or more will provide evidence on completion, through the submission of a post-construction BREEAM certificate, of achievement of the BREEAM 'excellent' standard for water consumption (or any future national equivalent).	The policy is concerned with the water efficiency standards that will apply to new developments in the borough.
DE5 – Proposals Affecting Existing Residential (C3) Uses	 Where planning permission is required for: a. Residential extensions, and/or b. Conversions, and/or c. Sub-division, Proposals will be required to: a. Respect and enhance the local, natural or historic character of the environment, paying particular regard to scale, materials, massing, bulk and density; b. Ensure that there is no detrimental impact on neighbouring properties in respect of residential amenity and access to daylight; c. Ensure that there is no detrimental impact on the amenity of occupants; 	Potential HRA implications. The policy relates to proposals that would affect existing residential dwellings, including the sub division of properties. The sub division of properties could lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the entire borough lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	d. Ensure that an appropriate level of amenity space is provided;	
	e. Provide adequate off-street parking to serve the property; and	
	f. Ensure no adverse effect on trees worthy of retention.	
	The Council will seek to minimise the loss of homes in the Borough by resisting development that would involve the net loss of residential units, unless it can be demonstrated that the proposal will:	
	a. Enable sub-standard units to be enlarged to meet residential space standards;	
	 Enable existing affordable homes to be adapted to address an identified shortfall in larger affordable dwelling sizes; 	
	c. Be a more appropriate use because of existing environmental conditions;	
	d. Ensure that a building of architectural or historic importance can be retained or renovated;	
	e. Be incorporated in a comprehensive scheme of redevelopment where there is no net loss of residential units; or	
	f. Provide an essential community facility, which cannot be provided elsewhere.	
DE6 – Open Space,	The Council will support good provision of high-quality and accessible open space and sport facilities to meet a wide range of recreation, sport and open space needs in	The policy is concerned with the provision of open space, sport and recreation facilities in

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Sport and Recreation	 Rushmoor by maintaining and improving provision and accessibility for all. Development will not be permitted on areas of open space used for recreation or outdoor sport or having visual amenity unless: a. Re-provision is made elsewhere of equivalent or better community benefit in terms of quality, quantity and accessibility; or b. The development is for sports and recreation provision, the need for which clearly outweighs the loss. The Council will permit new residential development which makes appropriate on-site provision for open space in accordance with the Council's standards, unless the development is of a size and/or in a location where a financial contribution, for the enhancement and management or creation of open space, for part or all of the open space requirement is considered more appropriate. 	the borough. The enhancement and provision of new open space within the borough could reduce recreational impacts upon European sites, specifically the Thames Basin Heaths SPA.
DE7 - Playing Fields and Ancillary Facilities	 Playing field sites, including ancillary built facilities, identified on the Policies Map or within the Rushmoor Playing Pitch Strategy 2014-2020, and any subsequent strategy update, will be protected for sport and recreational use unless: a. Replacement new provision, in an accessible location, and of equivalent or better quality and quantity, is made elsewhere of equivalent community benefit; or b. The development is for sports and recreation or ancillary provision, the need for which clearly outweighs the loss. Where permission is granted for new or improved facilities, the Council will encourage 	No HRA implications. The policy is concerned with the provision and protection of sport and recreation facilities in the borough. The enhancement of sport and recreation facilities in the borough could reduce recreational impacts upon European sites, specifically the Thames Basin Heaths SPA.

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	these to be made available for community use. To support participation in sport and the capacity of facilities to meet future demand, the Council will permit new residential development which makes appropriate provision for new playing fields and/or improvements identified within the Rushmoor Playing Pitch Strategy 2014-2020 'Site Specific Action Plan' and any subsequent replacements.	There are no impact pathways present.
DE8 - Indoor Sport and Recreation Facilities	 To promote healthy lifestyles and encourage physical activity,⁶³ indoor and built sport and recreation facilities will be promoted by: a. Safeguarding the existing viable indoor and built sport and recreation facilities; b. Supporting proposals for the refurbishment, replacement and extension of existing indoor and built sport and recreation facilities; and c. Supporting development for new and improved indoor and built sport and recreation facilities in sustainable locations, for which there is a strategic need. 	No HRA implications. The policy is concerned with the provision and protection of indoor sport and recreation facilities in the borough. The enhancement of existing or provision of new indoor sport and recreation facilities in the borough could reduce recreational impacts upon European sites, specifically the Thames Basin Heaths SPA. There are no impact pathways present.
DE9 – Advertisements	Consent will be granted for signs or advertisements where, by reason of siting, design and illumination: a. There is no adverse impact on highway safety;	No HRA implications. The policy is concerned with advertisements

⁶³ Based on an assessment of need and capacity, as set out in the Rushmoor Open Space, Sport and Recreation Study (2014) and any subsequent study update.

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	b. There is no harmful impact on the amenity of adjoining land uses; and	in the borough.
	c. There is no harmful impact upon the character of the area or to heritage assets.	There are no impact pathways present.
	Advertisements should:	
	a. Not obstruct windows, other signs or architectural features;	
	b. Be well-designed and in keeping with the scale and character of buildings on which they are displayed; and	
	c. Not contribute to an unsightly proliferation or clutter of signage in the vicinity.	
DE10 - Pollution	Development will be permitted provided that:	No HRA implications.
	 It does not give rise to, or would be subject to, unacceptable levels of pollution⁶⁴; and 	The policy is concerned with pollution in the borough.
	2. It is satisfactorily demonstrated that any adverse impacts of pollution, either arising from the proposed development ⁶⁵ or impacting on proposed sensitive development or the natural environment ⁶⁶ will be adequately mitigated or otherwise minimised to an acceptable level. ⁶⁷	The policy requires applicants to demonstrate that any adverse impacts of pollution, either arising from the proposed development or impacting on proposed sensitive development
	Where development is proposed on or near a site that may be impacted by, or may	or the natural environment, will be mitiga

 ⁶⁴ Pollution means anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, quality of life, the natural environment or general amenity. It includes noise, vibration, light, air quality, radiation, dust, fumes or gases, odours or other effluvia, harmful substances, or degradation of soil and water resources.
 ⁶⁵ Including the demolition and construction phases of development.
 ⁶⁶ To include nature conservation, landscape character and controlled waters.
 ⁶⁷ In accordance with recognised national and international standards, guidance and methodologies, or any local authority adopted supplementary guidance. Early dialogue is advised to clarify the

Council's criteria.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	give rise to, pollution, such a proposal shall be supported by a report that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The report shall propose adequate mitigation or remediation when required to achieve a safe and acceptable development. This report shall be written in line with best practice guidance.	otherwise minimised to an acceptable level This policy could reduce atmospheric pollution (specifically air pollution) which impacts upon European sites. There are no impact pathways present.
DE11 - Development on Residential Gardens	 Proposals for new residential development of sites which include the curtilage or the former curtilage of private residential dwellings will only be acceptable where: a. There is no adverse impact on the amenity of neighbours in terms of loss of privacy, or noise or disturbance from vehicular access or car parking; b. The development is not harmful to the character of the area in terms of: a. Relationships and integration with existing buildings and spaces; b. Impact on the street scene; c. Provision of appropriate hard and soft landscaping; and d. Compatibility with established pattern of development, general building height, materials and elevational detail, including architectural features, in line with other policies in this Plan. c. The proposal does not either alone or cumulatively diminish significantly any green corridor or have an adverse impact on biodiversity through the loss of 	Potential HRA implications. The policy relates to proposals that would result in development in residential gardens. The increase in dwellings that could result from this policy could lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to additional recreational pressure and disturbance on the Thames Basin Heaths SPA, since the entire borough lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects.

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	 locally important habitats; d. The application site provides a site of adequate size and dimensions to accommodate the development proposed in terms of the setting and spacing around buildings, amenity space, landscaping and space for access roads and parking; and e. The proposal does not lead to unacceptable tandem development. 	
Meeting Local Needs		
LN1 - Housing Mix	 To deliver a balanced mix of housing to create mixed and sustainable communities, and meet projected future household needs in Rushmoor, development will be permitted which provides for a mix of dwelling types and sizes having regard to: a. The size of the site; b. The most up-to-date evidence on local housing needs; c. The need to create diversification or greater choice within a specific location; d. Site-specific viability; e. Subject to site suitability, a target of 15% of market dwellings to be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2); and 	No HRA implications. This policy relates to housing mix. There are no impact pathways present.

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	serviced plots for self-build and/or custom-build homes.	
LN2 - Affordable Housing Policy	The delivery of affordable housing will be supported by requiring developments, subject to site viability, to provide:	No HRA implications.
	a. On sites of 11 or more dwellings, a minimum of 30% of dwellings as affordable homes;	This policy relates to affordable housing provision.
	 b. On sites within Aldershot and Farnborough town centres of 11 or more dwellings, a minimum of 20% of dwellings as affordable homes; 	There are no impact pathways present.
	c. A site appropriate mix of dwelling sizes designed to meet local needs, as set out in the SHMA (2016) or any subsequent update;	
	d. Predominantly subsidised rented affordable housing, in order to best meet local needs as set out in the SHMA (2016) and any subsequent update, with a smaller proportion of intermediate affordable housing, to help create mixed communities;	
	e. The integration of affordable housing with market housing, unless the development is 100% affordable housing;	
	 f. On sites of 15 or more dwellings, on-site provision of affordable housing, unless there are exceptional circumstances, in which case a commuted sum of equivalent value will be required; 	
	g. On sites of 11 to 14 dwellings, either on-site provision of affordable housing or a commuted sum of equivalent value; and	
	h. Subject to site suitability, affordable dwellings to be built to accessible and	

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	adaptable standards to meet the requirements of Building Regulations M4(2) and, where evidenced by local need, a proportion of affordable dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3).	
LN3 - Gypsies, Travellers and Travelling Showpeople	 The Council will safeguard existing sites for Travelling Showpeople. Where additional local need is demonstrated for new sites for Gypsies and Travellers and Travelling Showpeople, including transit sites, planning permission will be granted, or sites identified, to meet this need provided that the following criteria are met: a. Provision is made for safe and convenient access on to the highway network; b. The proposal will not have an unacceptable adverse impact on the amenity of adjoining property and land uses and on the natural and historic environment; c. The proposal will not have an unacceptable adverse impact on the physical and visual character of adjoining areas; and d. The site can accommodate on-site facilities, appropriate to scale. The Council will monitor existing supply, and delivery of new provision, to ensure that locally identified needs are being met. 	Potential HRA implications. The delivery of additional plots may lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the site lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects. The development of net new residential development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads
LN3.1 - Peabody Road	Land at Peabody Road Car Park, North Camp is allocated as a plot for Travelling Showpeople. The Council will work with the Travelling Showpeople community to grant	The delivery of additional plots may lead to an

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Car Park	 planning permission for the site which meets the following criteria: a. The plot is located alongside existing yards for Travelling Showpeople; b. It can be demonstrated that the configuration of the plot provides safe and convenient access on to the highway network; c. The proposed use of the land would not have an unacceptable adverse impact on the amenity of adjoining property and land uses; and d. The use and configuration of the plot would not prevent access to existing onsite infrastructure, including the soakaway tanks located under the car park. 	 increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the site lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such effects. The development of net new residential development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads
LN3.2 - Land at Hawley Lane South, Farnborough	 Land at Hawley Lane, Farnborough is allocated as a plot for Travelling Showpeople. The Council will work with the Travelling Showpeople community to grant planning permission for the site which meets the following criteria: a. It can be demonstrated that the configuration of the plot provides safe and convenient access on to the highway network; b. The proposed use of the land would not have an unacceptable adverse impact on the amenity of adjoining property and land uses; c. That the potential impact on amenity of residents resulting from the proximity of 	The delivery of additional plots may lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to excessive recreational pressure and disturbance on the Thames Basin Heaths SPA, since the site lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance Strategy requires mitigation to be applied to avoid such

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	the site to the M3 motorway can be mitigated appropriately; and d. That the use of the site to accommodate Travelling Showpeople does not prejudice other potential uses adjoining the site.	effects. The development of net new residential development has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads
LN4 – Specialist and Supported Accommodation	 Proposals for housing designed specifically to meet the identified needs of older people and others with a need for specialist housing, including specialist housing with care, will be permitted where: a. They meet a proven identified need; b. Sites are appropriately located in terms of access to facilities, services and public transport; and c. An appropriate tenure mix is provided. Where there is evidence of an identified unmet need in the local area, larger-scale new residential developments will be expected to consider the incorporation of specially designed housing/specialist accommodation, in line with the above criteria, to meet the needs of older people and people with support needs. 	No HRA implications. This policy relates to the provision of specialist and supported accommodation within housing mix. There are no impact pathways present.
LN5 - Neighbourhood Deprivation Strategy	A partnership approach will be taken towards neighbourhood improvement in deprived areas in the Borough, based on the Indices of Deprivation.	No HRA implications. This policy relates to the quality of

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	In these areas, the consideration of proposals for development will have regard to their ability to:	development resulting from Neighbourhood Renewal rather than the scale or location.
	a. Increase accessibility and opportunities for walking and cycling;	There are no impact pathways present.
	 Increase vitality and viability of local centres by ensuring an appropriate mix of uses and retention of a retail core; 	
	c. Provide access to open space;	
	d. Provide access to healthcare and education through partnership working with providers and the delivery of appropriate infrastructure from new development;	
	e. Provide improvements to housing choice and quality through working with providers and the implementation of appropriate housing type and mix policies;	
	 f. Deliver environmental improvements to improve public realm, and provide opportunities for greening the environment; 	
	g. Contribute to community safety; and	
	 Include measures consistent with corporate and partnership projects for Borough and neighbourhood improvement. 	
LN6 – 'Local Neighbourhood Facilities	Within 'Local Neighbourhood Facilities', development will be permitted that satisfies the following criteria:	No HRA implications.
	 a. It would not undermine the dominant local retail and service function of the 'Local Neighbourhood Facility', and the proposed use would attract footfall from 	This policy relates to the protection of designated neighbourhood shopping.

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	 the local area; b. It creates an active frontage; c. A change of use from A1 will not result in an over-concentration of the number of non-A1 units to the detriment of the retail function of the 'Local Neighbourhood Facility'; and d. There would be no material adverse impact upon the amenities of nearby residential uses. 	There are no impact pathways present.
LN7 – Retail Impact Assessments	 An impact assessment will be required for retail development not in the primary shopping area and not in accordance with the up-to-date development plan, which is above the following thresholds: a. An assessment of impact on Aldershot and Farnborough town centres and North Camp District Centre for any retail proposal with over 1,000 sq m gross floorspace. b. An assessment of impact on North Camp District Centre for any retail proposal for over 250 sq m gross floorspace and within one kilometre of the centre. c. An assessment of impact on a local neighbourhood parade for any retail proposal deemed to have the potential to have a significant adverse impact and within 500 metres of the parade. 	No HRA implications. This policy relates to when the council will require a Retail Impact Assessment to support a proposal. There are no impact pathways present.

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LN8 – Public Houses	 Development proposals resulting in the loss of a public house will be permitted where it can be proven that there is no longer-term need for the facility. In order to justify no longer-term need, the applicant will need to provide the following evidence: a. Confirmation by a commercial property agent that the premises were appropriately and extensively marketed; b. Property marketed for the appropriate use or uses as defined by the relevant planning policy for a period of 12 months minimum prior to the submission of the application; c. Property marketed at a reasonable price, including in relation to use, condition, quality and location of floorspace; d. Contact information posted in a prominent location on site, in the form of an advertising board (subject to advertising consent, if required); e. Property details/particulars available to inquirers on request; f. An enquiry log showing the number of enquiries, their nature, how they were followed up and why they were unsuccessful; and g. A copy of all advertisements in the local press and relevant trade journals (spread at appropriate time intervals throughout the marketing period). 	Potential HRA implications. This policy relates to the policy approach that will apply for proposals resulting in the loss of a public house. This could result in the conversion of public houses to residential. The increase in dwellings that could result from this policy could lead to an increased demand on space for leisure and recreation activities within the Borough. Unmitigated, this could lead to additional recreational pressure and disturbance on the Thames Basin Heaths SPA, since the entire borough lies within 5km of the SPA, a zone in which the Thames Basin Heaths Avoidance and Mitigation Strategy requires mitigation to be applied to avoid such effects.

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PC1 - Economic Growth and Investment	 The growth and retention of existing business and inward investment into the Borough will be supported by: a. Protecting Strategic Employment Sites for employment use (B-class) and enabling the regeneration / redevelopment of these sites for employment uses (Policy PC2) b. Protecting Locally Important Employment Sites for employment use (B-class) and enabling the regeneration / redevelopment of these sites for employment and alternate uses (Policy PC3) c. Supporting the delivery of infrastructure to contribute to the improvement of the skills and education of residents (Policy PC8). Opportunities to develop the following key employment sectors will be supported: Specialist / advanced manufacturing (including research and development), specifically at the established locations of Cody Technology Park and Farnborough Aerospace Park Manufacturing and distribution, specifically at the established industrial locations in the borough, notably the East Aldershot Industrial Cluster, Springlakes and Southwood Business Park 	 Potential HRA implications. This high-level policy strategic policy sets out the different policy frameworks that apply and also identifies the core locations in the borough for enabling specific sectors to expand. The development of new commercial development in the borough has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA outside Rushmoor, where additional retail, leisure or business journeys could affect the SPA beyond the borough boundaries. This policy is therefore screened in.

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PC2 - Strategic Employment Sites	To contribute towards meeting the future economic growth needs of the Borough and the wider functional economic area, the following sites are designated as 'Strategic Employment Sites' to be afforded the highest protection and safeguarding against loss to non-B-class employment uses by protecting them for B-class uses. ⁶⁸ Civil Enclave Frimley Business Park Cody Technology Park Invincible Road Industrial Estate East Aldershot Industrial Cluster Southwood Business Park Farnborough Aerospace Park The Royal Pavilion Farnborough Business Park Where possible and appropriate, the redevelopment and regeneration of these sites will be supported to provide B-class employment floorspace that meets the needs of the market. However, small-scale proposals for changes of use or redevelopment to non-B-class employment uses at the above sites will be supported where they would provide complementary use(s) that are not detrimental to the function and operation of the 'Strategic Employment Site'.	Potential HRA implications. The development of new commercial development in the borough has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA outside Rushmoor, where additional retail, leisure or business journeys could affect the SPA beyond the borough boundaries. It is important to note that all of the Strategic Employment sites listed in the policy are established employment areas and the majority of the sites are fully developed. However, given the opportunity to intensify uses at these sites through regeneration and the build out of Farnborough Business Park, the potential increase in employment and the associated increase in vehicle journeys requires this policy to be screened in.

⁶⁸ Uses that fall within Classes B1, B2 and B8 of the Town and Country Planning (Use Classes) (Amendment) (England) Order 2006.

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		Two Strategic Employment Sites allocated in the Local Plan are within 400m of the SPA; Cody Technology Park and The Royal Pavilion. These are existing employment sites, where the majority of the site has been developed, however urbanisation could present a potential pathway of impact.
PC3 - Locally Important Employment Sites	To contribute towards meeting the future economic growth needs of the Borough, the following sites are designated as 'Locally Important Employment Sites' and will be afforded protection against loss to non-B-class employment uses by protecting them for B-class uses ⁶⁹ Blackwater Trading Estate Lynchford Lane Eelmoor Road Redan Road Industrial Estate Hawley Lane East Rotunda Estate Hawley Lane South Spectrum Point Hawley Lane West Springlakes Hollybush Lane Wyndham Street	Potential HRA implications. The development of new commercial development in the borough has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA outside Rushmoor, where additional retail, leisure or business journeys could affect the SPA beyond the borough boundaries. It is important to note that all of the Locally Important employment sites listed in the policy are established employment areas and the

⁶⁹ uses that fall within Classes B1, B2 and B8 of the Town and Country Planning (Use Classes) (Amendment) (England) Order 2006.

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	 be supported to provide B-class employment floorspace that meets the needs of the market. The change of use or redevelopment of land and buildings in B-class employment use to non-B-class uses within the defined 'Locally Important Employment Sites' will be permitted where it can be demonstrated that: a. There are not strong economic reasons why the proposed development would be unacceptable; b. Market signals indicate that the premises/site are unlikely to come back into B-class employment use; c. The proposal would generate employment; d. The proposal would not be detrimental to the function and operation of the wider site; and/or e. The site is not appropriate for the continuation of its present or any B-class employment use due to a significant detriment to the environment or amenity of the area. 	majority of the sites are fully developed. However, given the opportunity to intensify uses at these sites through regeneration, the potential increase in employment and the associated increase in vehicle journeys requires this policy to be screened in.
PC4 – Farnborough Business Park	The role of Farnborough Business Park as the Borough's flagship office development site is recognised, and proposals that would develop or enhance the B1(a) office employment use will be supported. Development should respect the character and setting of the listed buildings and enhance, where possible, the linkages between other aviation heritage sites and buildings at and around the Airport.	Potential HRA implications. The development of new commercial development at Farnborough Business Park has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames

e wind tunnels, the Council will support proposals that o be utilised whilst conserving the wind tunnels' original sure that they are publicly accessible will be given the	Basin Heaths SPA where it lies within 200m of major roads.
	The above effects also apply to the SPA outside Rushmoor, where additional business journeys could affect the SPA beyond the borough boundaries. The potential increase in employment and the associated increase in vehicle journeys requires this policy to be screened in.
established development rights, the following criteria will	Potential HRA implications. The development of new commercial development at Cody Technology Park has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA
	5 ⁷⁰ and the Certificate of Lawful Use dated 12th January re any proposals for development are submitted which established development rights, the following criteria will ion: h proposals in this location is demonstrated; nefits to the local and wider economy can be

⁷⁰ Development which could accommodate up to around 19,500 square metres of a combination of B1(a), (b) and (c) floorspace. Reference: 93/00577 - C18/84.

⁷¹ Reference: 04/01001/EDC.

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	 demonstrated; c. That the proposal would not have a harmful effect on the separation of Farnborough and Fleet; d. That any proposals can be appropriately screened to minimise their visual impact; and e. That any impacts on the local highway network are appropriately mitigated. 	outside Rushmoor, where additional business journeys could affect the SPA beyond the borough boundaries. The potential increase in employment and the associated increase in vehicle journeys requires this policy to be screened in. Part of the site is within the Thames Basin Heaths SPA and 400m buffer zone and therefore urbanisation could present a potential pathway of impact.
PC6 – East Aldershot Industrial Cluster	 The role of the East Aldershot Industrial Cluster as the Borough's largest industrial area is recognised, and proposals that would develop or enhance the range of industrial uses (B1(c), B2, B8) will be supported. The re-development of existing employment units that have reached the end of their functional economic life, the refurbishment of existing stock, and subdivision of larger units to provide multiple units will be supported. The function and operation tests set out in Policy PC2 will still apply. 	Potential HRA implications. The development of new commercial development at the East Aldershot Industrial Cluster has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the European Sites. The above effects also apply to the European Sites (specifically the SPA) outside Rushmoor borough, where additional business journeys could affect the European Sites beyond the

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
		borough boundaries. It is important to note that the East Aldershot Industrial Cluster is an established employment area with only a very small amount of development land available with the majority of the site being fully developed. However, given the opportunity to intensify uses at these site through regeneration, the potential increase in employment and the associated increase in vehicle journeys requires this policy to be screened in.
PC7 – Hawley Lane South	 Land at Hawley Lane South, as identified on the Policies Map, is allocated as a 'Locally Important Employment Site'. The site will deliver small and start-up industrial units, in a mix of sizes ranging from around 70 sq m in size up to around 1,000 sq m in size, to meet identified need. The proposal will be acceptable subject to: a. Re-provision of the assumed right of way that crosses the site to retain pedestrian linkages between surrounding land uses; b. Suitable alternative re-provision of existing community facilities; c. Satisfactory noise mitigation measures to protect noise sensitive receptors adjoining the site; d. Provision for safe and sufficient access to the highway network; and e. An appropriate site layout that enables the co-location of the industrial uses 	Potential HRA implications. The development of new commercial development at Hawley Lane South has the potential to lead to increased road journeys within the Borough and therefore potentially reduced air quality on the Thames Basin Heaths SPA where it lies within 200m of major roads. The above effects also apply to the SPA outside of Rushmoor, where additional business journeys could affect the SPA

Policy number/ name	Rushmoor Local Plan Draft Policy	Screening Decision (green = screened out, amber = screened in for appropriate assessment)
	and the adjoining plot for Travelling Showpeople.	beyond the borough boundaries.
	Further detail on the plot for Travelling Showpeople is provided in Policy LN3.2.	The potential increase in employment and the associated increase in vehicle journeys requires this policy to be screened in.
PC8 – Skills and Training	 Planning permission will be permitted for development which, subject to compliance with other policies contained within this plan, supports educational and employment opportunities by: a. Delivering improvements to primary and secondary schools, and further and higher education facilities; b. Providing adult learning opportunities; c. Enhancing partnership working between developers, employers and training establishments in the Borough; d. Providing new training facilities; and e. Supporting local skills and employment providers. 	No HRA implications. This policy relates to the infrastructure to support skills and training development in the Borough. There are no impact pathways present.
Managing the Natural Environment		
NE1 - Thames Basin Heaths Special	New development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), including all net new dwellings, will be required to demonstrate that adequate measures are put in place to	This policy is a positive as the purpose of the policy is to protect the Thames Basin Heaths SPA from recreational pressure by providing

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Protection Area Policy	 avoid or mitigate any potential adverse effects. The mechanism for delivering this policy is set out in the Council's Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy (2014), supported by the Thames Basin Heaths Delivery Framework prepared by the Thames Basin Heaths Joint Strategic Partnership. Residential development that would result in a net gain of units will not be permitted within 400 m of the SPA boundary unless, in agreement with Natural England, an appropriate assessment demonstrates that there will be no adverse effect on the SPA. In all instances where mitigation measures are applicable, as set out in the Delivery Framework, the following standards will apply, unless an evidence-based alternative strategy has been agreed with Natural England: a. A minimum of 8 ha of SANG land (after discounting to account for current access and capacity) should be provided in perpetuity per 1,000 new occupants, either through contributions towards the provision of SANG identified by the Borough Council, or through on-site SANG, agreed with Natural England; and b. Contributions towards Strategic Access Management and Monitoring measures. 	avoiding or mitigating any adverse impacts on the TBH SPA.
NE2 – Green Infrastructure	 A diverse network of accessible, multi-functional green infrastructure across the Borough will be protected and enhanced for its biodiversity, economic, recreational, accessibility, health and landscape value by ensuring that development: a. Does not result in a loss, fragmentation or significant impact on the function of the green infrastructure network; b. Provides green infrastructure features within the development site or, where 	This policy is a positive as the purpose of the policy is provide a network of accessible, multi-functional green infrastructure across the Borough. Such infrastructure should protect European Sites (specifically the Thames Basin Heaths SPA) from recreational

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	 this is not feasible, makes appropriate contributions towards other strategic enhancement, restoration and creation projects where the proposal will result in additional pressure on the green infrastructure network; c. Maximises opportunities for improvement to the green infrastructure network, including restoration of fragmented parts of the network. Development proposals will only be permitted where they do not have a significant adverse impact on the essentially open character of 'Important Open Areas', as shown on the Policies Map. Development proposals within or adjoining green corridors, as shown on the Policies Map, will be expected to enhance their landscape and amenity value. 	pressure.
NE3 – Trees and Landscaping	The Council will not permit development, which would affect adversely existing trees worthy of retention, particularly those subject to Tree Preservation Orders, and where appropriate will ensure that trees are protected either through condition or the making of new TPO's. New development will be expected to make provision for tree and general planting in appropriate situations, to improve the level of tree coverage within the Borough and therefore improve and enhance its contribution to visual amenity, biodiversity and to climate change. Major development plans for agreement, including where appropriate, the mechanisms for long term maintenance. All landscaping and tree planting schemes should include species appropriate to the site conditions and to anticipated forecasts of climate change.	This policy is a positive as the purpose of the policy is provide protection to existing trees and make provision for tree and general planting as part of new development. This will contribute to the network of accessible, multi- functional green infrastructure across the Borough.

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NE4 – Biodiversity	 Development proposals will be permitted if significant harm to biodiversity and/ or geodiversity resulting from a development can be avoided or, if that is not possible, adequately mitigated such that it can be clearly demonstrated that: There will be no adverse effect on the conservation status of key species; and There will be no adverse effect on the integrity of designated and proposed European designated sites; and There will be no adverse effect to nationally designated sites; and There will be no adverse effect to locally designated sites; and There will be no adverse effect to locally designated sites; and There will be no adverse effect to locally designated sites; and There will be no adverse effect to the integrity of linkages between designated sites and key habitats; and There will be no adverse effect to the integrity of linkages between designated sites and key habitats. The weight given to the protection of nature conservation interests will depend on the international, national or local significance and any designation or protection applying to the site, habitat or species concerned. Where development proposals do not comply with the above they will only be permitted if it has been demonstrated clearly that there is an overriding public need for the proposal which outweighs the need to safeguard biodiversity and/ or geodiversity, and there is no satisfactory alternative with less or no harmful impacts. In such cases, as a last resort, compensatory measures will be secured to ensure no net loss of biodiversity and, where possible, provide a net gain. 	This policy is a positive as the purpose of the policy is to protect, maintain and enhance the Borough's biodiversity and geological across the Borough and makes specific reference to protecting, enhancing and managing the nature conservation value of Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs).

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	3. Development proposals should seek to secure opportunities to enhance biodiversity and include proportionate measures to contribute, where possible, to a net gain in biodiversity, through creation, restoration, enhancement and management of habitats and features including measures that help to link key habitats.	
	4. The Council will seek to protect, maintain and enhance biodiversity and geological resources, at the local and landscape level, in association with partners, through:	
	a) Supporting a programme of survey of habitats and species, and designation of Sites of Importance for Nature Conservation	
	b) Seeking the inclusion of measures which protect and strengthen populations of protected and target species and contribute to the habitat restoration targets identified in the Rushmoor Biodiversity Action Plan	
	c) Seeking the inclusion of measures to protect and enhance local watercourses, including the River Blackwater, Cove Brook and Basingstoke Canal and their tributaries	
	d) Maintaining a Borough-wide network of local wildlife sites and wildlife corridors between areas of natural greenspace to prevent the fragmentation of existing habitats	
	e) Supporting measures to increase local understanding of the importance of biodiversity in the Borough.	
NE5 - Countryside	Development within the countryside (outside the Defined Urban Area of Aldershot and Farnborough) will only be permitted where:	No HRA implications. The policy is concerned with development in

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	1. The location is considered sustainable for the proposed use	the Countryside.
	2. It preserves the character and appearance of the countryside	There are no impact pathways present.
	 It does not lead to harmful physical or visual coalescence between Aldershot and Farnborough and neighbouring settlements. 	
	The Council will encourage schemes that result in environmental and landscape improvement, enhance biodiversity and nature conservation, and support better accessibility.	
NE6 - Managing Flood Risk	New development will be directed to areas of lowest risk, giving highest priority to Flood Zone 1. Development with the highest vulnerability classification should be located within areas at lower flood risk and thereafter, more vulnerable development should be considered, and then less vulnerable.	No HRA implications. The policy is concerned with managing flood risk.
	Development proposals in Flood Zone 2 and Flood Zone 3 need to demonstrate that:	There are no impact pathways present.
	a. the development provides wider sustainability benefits to the community that outweigh flood risk; and	
	b. the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.	
	There may be a requirement to undertake a Sequential Test subject to the type of development proposed.	
	Development proposals within Flood Zone 2 and Flood Zone 3 will be appropriately flood resilient and resistant, including safe access and escape routes where required,	

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	and that any residual risk can be safely managed.	
NE7 - Areas at risk of Surface Water Flooding	 For proposals within defined areas at risk of surface water flooding (as identified on the Policies Map), applicants will need to submit a surface water assessment that: a. demonstrates that flood resistance and resilience measures have been incorporated; and b. demonstrates that all new buildings and the development of car parking and hard standing incorporates sustainable drainage systems (SuDS) that achieve returning runoff rates and volumes equivalent to original greenfield discharge to alleviate flooding; and c. demonstrates that the risk of surface water flooding is adequately managed and mitigated to prevent a deterioration of water quality and pollution of the water source. 	No HRA implications. The policy is concerned with Areas at risk of Surface Water Flooding. There are no impact pathways present.
NE8 - Sustainable Drainage Systems	 The implementation of integrated and maintainable SuDS in all flood zones for both brownfield and greenfield sites is required. Infiltration techniques should be investigated in the first instance as this mimics the natural hydrological process. In areas where infiltration is considered to be inappropriate e.g. contaminated land, other SuDS techniques will be considered. For greenfield developments, the peak runoff rate/volume from the development to any drain, sewer or surface water body for the 1 in 1 year and 1 in 100 year rainfall event must not exceed the greenfield runoff rate/volume from the development to any drain, sewer or surface water body for the 1 in 1 year and 1 in 100 year rainfall event 	No HRA implications. The policy is concerned with Sustainable Drainage Systems. There are no impact pathways present.

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	must be as close as reasonably practical to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the existing development on site.	
NE9 - Surface Water Flooding at Farnborough Airport	All development proposals within the Farnborough Airport Planning Policy Boundary will incorporate a site-specific flood risk assessment that ensures a greenfield discharge rate or better is achieved in order to not further exacerbate surface water flooding problems downstream.	No HRA implications. The policy is concerned with Surface Water Flooding at Farnborough Airport. There are no impact pathways present.

Appendix 2 – Air Quality Analysis

A.1. Transport modelling has identified the change in flows on roads within 200m of internationally designated sites. The Design Manual for Roads and Bridges (DMRB) states that if the change in flows between the Do Minimum and Do Something Scenarios is less than 1,000 AADT the air quality effect can be considered neutral and no further assessment is necessary. However, to ensure that this is the case it was decided to further investigate the road links where more than a minimal increase in flows is predicated (i.e. over 100 AADT). These are listed in Table 12 below.

Table 12: Roads within 200m of the European sites subject to further air quality analysis

Major Road	Site	Change from Do Minimum to Do Something (2031) (AADT)	
within 200m		Vehicles	HGVs
A325	Thames Basin Heaths SPA	179	-7
A323	Thames Basin Heaths SPA	269	1
A3	Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA Thursley, Ash, Pirbright and Chobham SAC Wealden Heaths Phase II SPA	557	12
B311	Thames Basin Heaths SPA Thursley, Ash, Pirbright and Chobham SAC	208	-1

- A.2. Using three traffic forecast scenarios, information on average vehicle speeds⁷² and percentage heavy-duty vehicles, both of which influence the emissions profile, nitrogen deposition rates were calculated. The difference between the Do Minimum and Do Something scenarios is essentially the Process Contribution (PC).
- A.3. The predictions of nitrogen deposition for the PC are based on the assessment methodology presented in Annex F of the DMRB, Volume 11, Section 3, Part 1 (HA207/07) for the assessment of impacts on sensitive designated ecosystems due to highways works. Additional guidance on running the DMRB Screening Model is available from the Local Air Quality Management (LAQM) Support⁷³ and the method to convert NOx to NO2 specified within this document was used for all road links.

⁷² The speed limit was used as a default in keeping with HA207/07 guidance.

⁷³ https://laqm.defra.gov.uk/review-and-assessment/tools/modelling.html

- A.4. Background data for the predictions were sourced from the Department of Environment, Food and Rural Affairs (Defra) background maps for 2013 projected forward to 2030. These maps do not go beyond 2030 so it was decided to use 2030 background data for the assessment of 2032. This is likely to represent a worst case scenario as background levels are predicted to continually reduce over time, so levels projected for 2030 are likely to the higher than those for 2032 when they are finally produced. This was considered acceptable, as this was purely a screening exercise. Should the results show any significant process change with regards nitrogen deposition, then a more detailed modelling exercise would be undertaken.
- A.5. Background nitrogen deposition rates were sourced from the Air Pollution Information System (APIS) website.
- A.6. Guidance note HA207/07 advises that background rates are reduced by 2% per year to allow for an improvement in background air quality over the Local Plan period as a result of ongoing national initiatives to improve emissions and the expected improvement in vehicle emissions over that period. However, due to the uncertainty in the rate with which projected future vehicle emission rates and background pollution concentrations are improving, the assumption has been made that conditions in 2021 (the midpoint between the base year and the year of assessment) are representative of conditions in 2032 (the year of assessment). This approach is accepted within the professional air quality community and accounts for known recent improvements in vehicle technologies (new standard Euro 6/VI vehicles), whilst excluding the more distant and therefore more uncertain projections on the future evolution of the vehicle fleet.
- A.7. Each road was investigated in a transect up to 200m away from each of the affected roads as recommended within guidance note HA207/07. The tables below present the calculated changes in nitrogen deposition due to modelled scenario resulting from development from the Plan on each location modelled compared to that which would occur in any case over the plan period. In these tables, 'Baseline' refers to the current (2013) baseline flows. The key column/row is that which shows the difference between the Do Minimum and Local Plan Scenarios (Change) this identifies the contribution of development provided in the Local Plan, i.e. the Process Contribution. For nitrogen deposition, if the numbers fall on or below 0.1 kgNha-1yr-1 (1% of the lowest point in the Critical Load range) then it can be screened out.

Table 13: Air Quality Analysis on A325

Distance	Annual Mean Nitrogen Deposition (Kg N/ha/yr)			
from road (metres)	Baseline 2013	Do Minimum	Do Something (Local Plan)	Change from Do Minimum to Do Something
10	24.11263	19.82084	19.82084	0.000
20	23.96163	19.68784	19.69284	0.005
30	23.85163	19.59484	19.59484	0.000
40	23.77163	19.52684	19.52684	0.000
50	23.71063	19.47484	19.47484	0.000
100	23.54763	19.33684	19.33684	0.000
150	23.50063	19.29984	19.29984	0.000
200	23.49063	19.28884	19.28884	0.000

Table 14: Air Quality Analysis on A323

Distance	Annual Mean Nitrogen Deposition (Kg N/ha/yr)			
from road (metres)	Baseline 2013	Do Minimum	Do Something (Local Plan)	Change from Do Minimum to Do Something
10	23.73163	19.71284	19.71784	0.005
20	23.61163	19.57484	19.57484	0.000
30	23.52063	19.47084	19.47084	0.000
40	23.45463	19.39784	19.39784	0.000
50	23.40263	19.33984	19.33984	0.000
100	23.27863	19.19084	19.19084	0.000
150	23.23663	19.14784	19.14784	0.000
200	23.23163	19.13684	19.13684	0.000

Table 15: Air Quality Analysis on A3

Distance	Annual Mean Nitrogen Deposition (Kg N/ha/yr)			
from road (metres)	Baseline 2013	Do Minimum	Do Something (Local Plan)	Change from Do Minimum to Do Something
10	16.46088	13.51699	13.57844	0.061
20	16.20588	13.29199	13.35944	0.067
30	16.01488	13.13499	13.19644	0.061
40	15.87488	13.01099	13.07744	0.066
50	15.76288	12.92199	12.98344	0.061
100	15.47888	12.67899	12.74044	0.061
150	15.39988	12.60899	12.67044	0.061
200	15.37388	12.59299	12.65444	0.061

Table 16: Air Quality Analysis on B311

Distance	Annual Mean Nitrogen Deposition (Kg N/ha/yr)			
from road (metres)	Baseline 2013	Do Minimum	Do Something (Local Plan)	Change from Do Minimum to Do Something
10	16.23388	13.21599	13.28744	0.07
20	16.15388	13.13299	13.19444	0.06
30	16.09288	13.06499	13.13244	0.07
40	16.04788	13.01799	13.08444	0.07
50	16.01688	12.98699	13.04844	0.06
100	15.92988	12.89099	12.95244	0.06
150	15.90388	12.86499	12.92644	0.06
200	15.90388	12.85899	12.92044	0.06