

Note of meeting with Keith Holland: Hart Local Plan

30th March 2015

Attendees

Keith Holland on behalf of DCLG

Cllr Stephen Parker, Leader of the Council and Portfolio Holder for Planning

Cllr Ken Crookes, Portfolio Holder for Economic Development and Corporate Finance

Daryl Phillips, Joint Chief Executive

Daniel Hawes, Planning Policy Manager

Robert Jackson, Planning Manager

Ray Bryant, Principal Planning Policy Officer

Laura Cornborough, Planning Policy Officer

Kate Atter, Planning Policy Technician

Duty to cooperate

1. The Council must work with its partners to meet the needs of the housing market area.
2. KH quoted examples in Aylesbury Vale and Mid-Sussex where there were similar circumstances as Hart's and where plans failed the duty to cooperate because they did not address unmet need arising in a neighbouring area.
3. It is perfectly legitimate for Hart to press Rushmoor and Surrey Heath on delivery of more housing to meet their needs or reduce their shortfalls. Hart could object to Rushmoor's draft plan in summer 2015 if it were not satisfied that the Rushmoor Plan sought to maximise housing opportunities, but this will only be effective if Hart can provide an evidence base to support its objection. For example, evidence that individual sites could be built at higher density, or that some employment sites need not be protected for employment use.
4. Hart can press Surrey Heath to review its Green Belt, but under current government policy Surrey Heath are not forced to do so, even if they have a housing shortfall against their objectively assessed needs. We don't know whether an incoming government after the next election will change the approach to green belt, so Hart needs to work on the basis of current policy.
5. Through its Sustainability Appraisal Hart must test an option whereby it takes all of the estimated shortfall in Rushmoor and Surrey Heath.
6. Tactically, Hart should show to an inspector that it acknowledges the housing problem, and accept that it is likely to have to take an element of unmet need now. This would show an inspector that Hart is being reasonable in the

circumstances. In practice this could mean taking an element of Rushmoor's need now, but dealing with further shortfalls in Rushmoor and Surrey Heath through an early review once there is more certainty over what those authorities can deliver. Hart would need to quantify the amount of unmet need it is agreeing to take in its plan. It would also need to justify why it's not taking all the unmet need.

7. It would also be sensible for Hart to illustrate how it would address further unmet need quickly through an early review or partial review of its plan. To be found sound the other authorities will need to show that they have done all they can to meet their needs.
8. It may be possible to address unmet need in Rushmoor and Surrey Heath in the later years of Hart's plan, for example if Rushmoor and Surrey Heath can meet their housing needs in the first 5-10 years of the plan. Are there sites that Rushmoor and Surrey Heath can release now for housing?
9. If Rushmoor submit a plan that does not meet their own needs, then an inspector would only be interested in whether they have gone as far as they can in meeting their needs. Rushmoor would not need to consider the sustainability implications on adjoining areas of any 'overspill' housing that should be met in those areas.
10. In terms of economic development, an inspector will want to see that the supply of employment land is sufficient to meet needs across the functional economic area. It is not necessary to localise demand and supply for employment land to district/borough level. Thus it is permissible to release appropriate employment sites for residential use to help meet local district or borough needs for housing provided the economic needs across the functional economic area are met.
11. For the duty to cooperate it is important that there are discussions at Member level, and that records of meetings are kept.

A new settlement

12. You don't need to have all the 'i's dotted and all the 't's crossed in the local plan regarding delivery of a new settlement. You only need to show it has a reasonable prospect that it would happen. Need to show that key infrastructure items necessary for the new settlement have a realistic prospect of being delivered.
13. In the absence of any New Towns legislation, delivering a new settlement presents challenges in terms of infrastructure funding. Similar issues arise for strategic urban extensions that require significant infrastructure items.
14. Piecemeal, ad hoc development of a new settlement can be prevented if you have a policy approach that requires comprehensive redevelopment and a process for master-planning set out in the plan.

Green Belt / Gaps

15. The designation of new Green Belt in Hart will not be appropriate since they are designed for cities and larger town/conurbations. Local designations such as 'gaps' are more likely to be justified.

Vision

16. To develop a Vision for Hart one must first establish the development needs of the district (housing, social economic development etc.) Only once established can one develop the Vision to reflect ways in which the needs are to be addressed. It would not be sound to establish a Vision first without knowledge of the needs. Keith Holland agreed that the Council was addressing the matter properly.