

Hart Local Plan 2011-2032

Strategy and Sites Development Plan Document



Housing Development Options Consultation Paper

August 2014



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SECTION I: SETTING THE CONTEXT FOR A NEW HART LOCAL PLAN

Introduction

- I.1 Preparing a new local plan is a top priority for Hart District Council. There is considerable need and demand for new development in Hart, particularly for new housing. The Council is keen to put a new plan in place as quickly as possible to provide maximum control over where, when and how new development takes place.
- I.2 At the heart of the new plan will be a strategy for dealing with new housing growth. Through this consultation the Council is inviting views at an early stage on which type of strategy the Council should pursue; whether by dispersing growth to existing settlements, focussing development at a new settlement, or some other pattern of distribution.
- I.3 This paper also sets out the main issues the plan needs to consider and address, including environmental constraints, infrastructure provision, the extent of the need for housing and Hart's relationship with surrounding areas. It also puts housing growth in the context of wider objectives for economic growth. Your views are sought on all these matters, via a questionnaire available with this document.

About this Document

- I.4 The main role of this document is not to create new evidence, but to review the evidence that already exists and to use this to develop a range of high-level development options. These options essentially provide alternative ways in which a new plan could seek to deliver the additional homes and other types of development that will be needed within the District during the period to 2032.
- I.5 The structure of this document takes the reader through the distinct stages that have resulted in the development options set out in Section 4 below. The structure seeks to provide an understanding of how the development options have been derived and how they could be taken forward into planning policy. The following provide a summary of the document structure:
- **Section 1** (this section) provides context for the new Local Plan by addressing 'frequently asked questions' about the purpose, content and process of preparing a local plan. A summary review of Hart's local plan evidence base is also provided as part of the context, with greater detail of the evidence base being included within Appendix A.
 - **Section 2** Focuses on Hart District and summarises the issues, constraints and opportunities it faces, as informed by the available evidence. There is some overlap here with the Council's updated Sustainability Appraisal Scoping Report (April 2014). However, since these issues provide a backdrop to the process of creating options for future development within Hart and begin to explain the origins of the options, it is considered useful to include a summary of the key issues.
 - **Section 3** provides an assessment of the growth and development requirements of Hart, looking in turn at housing, employment and infrastructure. These requirements are based on current evidence only and do not represent any agreed position on future requirements. However, an understanding of the current state of the evidence is important to provide a basis for evaluating how each of the development options, covered in the next section, are likely to perform.
 - **Section 4** sets out the five key development options currently being considered for taking forward within a new Hart Local Plan, either alone or in combination. Each of the options is assessed using consistent criteria to provide a means of evaluating their likely performance. In addition, and contained within a separate paper published alongside this document, is an Interim Sustainability Appraisal of the development options.

- **Section 5** outlines potential delivery mechanisms that may be used to take one or more of the development options through the strategic planning process.

Engagement Undertaken During the Production of this Document

- 1.6 Hart District Council has prepared this document with assistance from Adams Hendry Consulting Limited. Throughout the process of developing the document and the housing development options (set out in Section 4 below), key Hart District Councillors have been kept informed and have been provided with opportunities to influence the development of the document. In addition, the Council held a Local Plan Seminar on 11th March 2014 to report on progress on the Joint Strategic Housing Market Assessment and on the development of the potential housing development options set out within this document. Hart's District Councillors as well as all of Hart's Parish and Town Councillors were invited to attend the meeting and were provide with an opportunity to question Officers and their consultants and to provide suggestions on the development of the housing options.

Sustainability Appraisal

- 1.7 European Union and UK law requires the preparation of local plans to be informed by a sustainability appraisal (including a strategic environmental assessment). This must identify and evaluate the likely significant effects on the environment of each of the reasonable alternatives that were considered during the preparation of the local plan. Therefore, the options for housing delivery set out below have been subjected to a high-level sustainability appraisal options assessment, which is appropriate for this stage of local plan preparation. This paper should therefore be read alongside the Interim Sustainability Appraisal Report, and both documents should be considered when evaluating the various options and deciding which of these should be taken forward to the next stage of plan preparation.

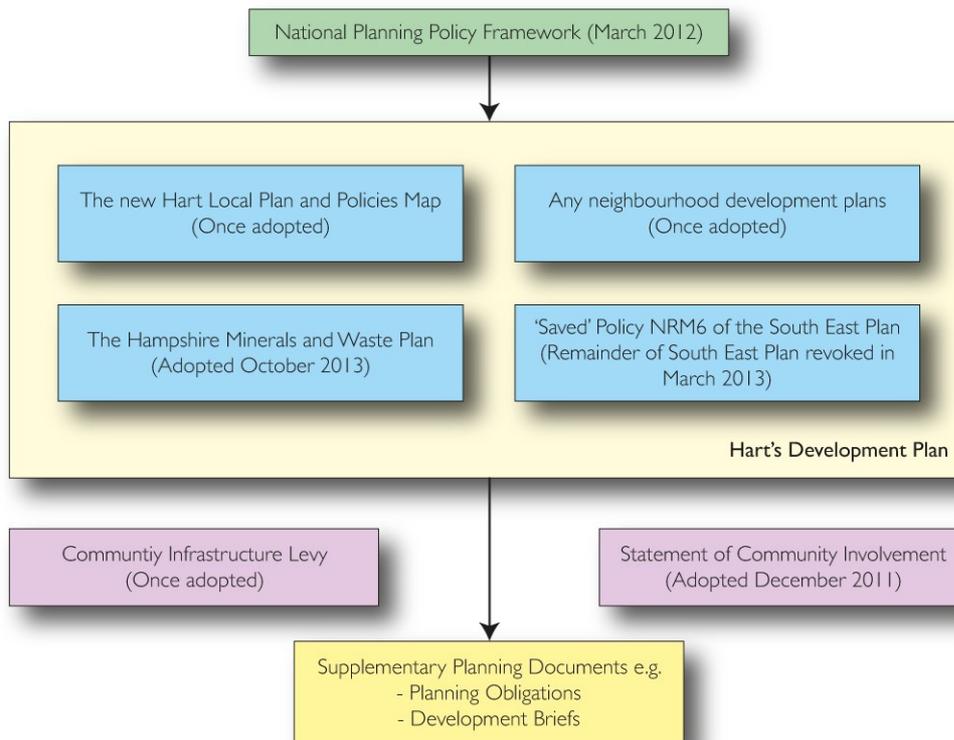
A new Hart Local Plan – 'Frequently asked Questions'

What is a local plan?

- 1.8 Local plans establish a policy framework for future delivery of sustainable development within the area. Local plans should aim to meet development needs in relation to housing, the economy, community facilities and infrastructure. Local plans must also provide a clear basis for protecting the environment and for ensuring that future development adapts to climate change.
- 1.9 Local plans are important because they form a part of the statutory 'development plan' for the area, along with any adopted neighbourhood plans and the minerals and waste plan (see Figure 1.1). The law states that planning applications must be determined in accordance with the development plan unless other 'material considerations' indicate otherwise¹. In Hart's case, as it is an authority affected by the Thames Basin Heaths Special Protection Area, the development plan will also continue to include 'saved' Policy NRM6 of the otherwise revoked South East Plan.
- 1.10 Government guidance sets an expectation for local plans to be prepared as a single document. However, where there is good justification to do so, a local authority may split its local plan into different documents. Hart is preparing a Strategy and Sites Development Plan Document, which will set out the broad development strategy including sites and broad locations for new development. It will include a number of policies on social, economic and environmental issues to ensure new development is delivered not just in the right place, but in the right way in terms of design, environmental protection, and the provision of on-site facilities, affordable housing etc.

¹ [Section 38 of the Planning and Compulsory Purchase Act 2004](#)

Figure I.1: Hart's Development Plan following adoption of the new Hart Local Plan



Why does Hart need a new local plan?

- I.11 The current local plan, the 'Hart District Local Plan (Replacement) 1996-2006' was first adopted in 2002 and was partially revised in 2006. Since that time the majority of its policies have been 'saved' pending the preparation of a new local plan. Many of the proposals within the current Hart District Local Plan have now been successfully achieved with a range of housing, employment and other developments being delivered across Hart. However, the plan is now out of date and the weight afforded to its policies in the determination of planning applications will depend on the degree of conflict with the NPPF.
- I.12 A further reason to update the local plan now is to take account of the significant changes to the planning system introduced in recent years. These changes include the revocation of the South East Plan and its various 'top down' targets for housing and other forms of development and the introduction of neighbourhood planning as a new 'bottom up' mechanism to plan for future development at the local level. In addition, there have been far-reaching changes to national planning policy with the introduction of the National Planning Policy Framework (NPPF) and the creation of new online National Planning Guidance.
- I.13 In addition, an updated local plan is needed to take account of the full range of major economic, social and environmental changes that have impacted on Hart in recent years. Not least of these is the effect of the recession and subsequent beginnings of the recovery. This is bringing both opportunities, in terms of economic growth and job creation, but also risks, such as worsening housing affordability and increased pressure on roads, schools and other infrastructure.
- I.14 If a new local plan is not put in place, Hart will have less ability to control and shape new development, with a risk that some unwanted development is allowed on appeal.

What would a new Hart Local Plan need to include?

- I.15 The National Planning Guidance states that local plans need to make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. The starting point would include developing a vision for Hart District, setting out realistic aspirations for the area by the end of the plan period. This vision should be supported by a series of deliverable objectives that set out clear actions necessary to bring the vision into fruition.
- I.16 The objectives should relate clearly to the strategic priorities for Hart, which will be delivered through policies within the local plan. The NPPF states that these key strategic policies should seek to deliver:
- Hart's requirements for different types of development, including housing, employment, retail and leisure;
 - The necessary infrastructure and community facilities to support new development; and
 - Climate change mitigation and adaptation and measures to conserve and enhance the environment and landscape.
- I.17 Where new development is proposed, national policy encourages this to be taken forward as site allocations including sufficient detail on the form, scale, access and quantum of development. Such allocations and other detailed land designations would need to be included on Hart's Policies Map that will form a part of the Local Plan. Any sites that were intended to form a part of Hart's 'five year supply' of 'deliverable'² housing sites and which did not already benefit from a planning permission would need to be allocated in the local plan. This is to increase the certainty of delivery for development required early in the plan period.
- I.18 Where development proposals are intended to be delivered later in the plan period (taken to be years 6 to 15) they do not necessarily need to be specifically allocated, but could alternatively be included as broad development locations and identified on the 'key diagram' that would need to be included within the local plan.
- I.19 There is a wide variety of issues that could be dealt with within a local plan and these will be determined by the evidence base that supports the plan as well as by the views of stakeholders and the wider local community expressed during plan preparation. Overall, the plan should focus on the issues that need to be addressed and the plan as a whole should be aspirational but realistic. As part of this, the plan will need to set out how the 'objectively assessed development and infrastructure needs' of the area will be met³. Whilst this will focus primarily on Hart District's needs, it should also potentially include any unmet needs of neighbouring areas where these can reasonably be met within Hart.

What is the relationship between the Hart Local Plan and neighbourhood planning?

- I.20 The Localism Act 2011 gave local communities, essentially the parish or town councils within Hart District, the right to undertake neighbourhood planning to determine the sustainable development needs of their own areas and address these needs. Where a neighbourhood plan successfully passes an independent examination and a local referendum, it will be 'made', which means it becomes a part of the statutory development plan.
- I.21 Neighbourhood plans can be prepared at any time and do not need to wait until the Hart District Council adopts its new Local Plan. Where neighbourhood plans come forward ahead of the new Hart Local Plan, they will not be tested against the emerging policies of that plan, but will need to be consistent with the NPPF. In such cases, Hart District Council would take account of the neighbourhood plan in the preparation of its local plan. However, the District Council has responsibility for strategic planning across its area and therefore may need to plan for development, over and above that proposed within a neighbourhood development plan, if it is required to meet strategic objectives.

² The NPPF defines 'deliverable' as sites that are available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. (NPPF, Footnote 11)

³ 'Objectively assessed development needs' is an important concept within the NPPF that is discussed in greater detail in Section 3 of this document.

1.22 Once the Hart Local Plan is adopted, any neighbourhood plans being prepared will need to be in general conformity with the strategic policies within the Local Plan. National policy expects local authorities to be supportive of neighbourhood planning and to set out the ways in which parish and town councils will be supported in this process. More detail about the content of neighbourhood plans and their potential role in meeting Hart's development needs can be found in Section 5 of this document.

What evidence will be used to support the preparation of the Hart Local Plan?

1.23 Hart District Council will need to ensure that its local plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The NPPF specifically requires that evidence and strategies for housing, employment and other uses are integrated, and take account of relevant market and economic signals.

1.24 The Council has made considerable progress in updating its evidence base to support the development of a local plan and Appendix A provides information on the latest position on each area of evidence and highlights important gaps that the Council will need address over the coming months. The list below provides a simple summary of the main evidence sources, in addition to this document, that will support the development of the new Local Plan and each of these is (or will be) available on the Council's website:⁴

- Strategic Housing Market Assessment (SHMA) (June 2014)
- Strategic Housing Land Availability Assessments (SHLAA) (November 2013 and on-going)
- Affordable Housing Viability Study (2011)
- Housing Supply and the Thames Basin Heaths Special Protection Area (to be published July 2014)
- Landscape Capacity Study (work in progress)
- Development Site Appraisal Study (not yet commenced)
- Hart Gypsy and Traveller Accommodation Assessment (May 2013) (to be updated)
- Hart District Profile 2011
- Employment Land Review 2009 (to be updated)
- Defining Hart's Functional Economic Area (Draft June 2014)
- Retail Study Update (March 2012) (to be updated)
- Audit of the different uses and vacancies Hart's main settlements (2010) (to be updated)
- Blackwater Valley Water Cycle Study Scoping Report (2011)
- Strategic Flood Risk Assessment (2008) Currently being updated)
- North Hampshire Renewable Energy and Low Carbon Development Study (2010)
- Hart District Landscape Assessment (1997)
- Hampshire Integrated Character Assessment (May 2012)
- Open Space, Sport and Recreation Assessment (June 2012) (to be updated)
- Thames Basin Heaths Special Protection Area Delivery Framework (2009)
- Thames Basin Heaths Strategic Access Management and Monitoring Tariff Guidance (March 2011)
- Preliminary Transport Assessment (2010)
- Transport assessment for the M3 Corridor J3-4a Joint LDF Study (2011)
- Transport Assessment Mitigation Corridor Study (March 2013) (to be updated)
- Urban Characterisation and Density Study (2010)
- Hart Settlement Hierarchy (2010) (being updated)
- Infrastructure Delivery Plan and Implementation Strategy (to be updated)
- Sustainability Appraisal Scoping Report Update (Consulted on April-May 2014)

Which other plans and documents does Hart Local Plan need to have regard to?

1.25 In preparing its new local plan, the Council would need to ensure that it was fully consistent with the relevant planning legislation⁵ and with other adopted parts of the Hart Development Plan (see Figure 1.1 above). The new Local Plan would not need to be consistent with the 'saved policies' of the

⁴ All of Hart District Council's evidence documents cited in this report are (or will be) available on the ['Evidence Base' page of the Council's website](#).

⁵ The main relevant legislation includes [The Planning and Compulsory Purchase Act 2004](#), the [Localism Act 2011](#) and the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

existing Hart District Local Plan 1996-2006, which would be completely replaced by the new Local Plan.

I.26 The Council would also need to draw upon or have regard to a wide range of plans and documents including the extensive evidence base as detailed above. Further documents to which the local plan must have regard are set out in legislation and include:

- National planning policies (the NPPF) and National Planning Guidance;
- Hampshire County Council's Local Transport Plan 2011-2031;
- The Hart Sustainable Community Strategy 2008-2018;
- The Hampshire Sustainable Community Strategy 2008-2018; and
- Any other adopted local development documents, namely the Statement of Community Involvement and the Yateley Village Design Framework Supplementary Planning Document.

I.27 In addition, it will be essential for the preparation of the Local Plan to have regard to the adopted and emerging local plans of all Hart's neighbouring local authorities. However, under the 'duty to cooperate' it is no longer enough to ensure that Hart's local plan proposals are consistent with those of its neighbours. The duty requires a much more proactive and collaborative approach to be taken throughout the whole local plan preparation process, to ensure that strategic priorities are properly coordinated (see below).

I.28 Finally, preparation of the local plan will need to have regard to relevant plans drawn up by the Enterprise M3 Local Enterprise Partnership (LEP). Enterprise M3 LEP plays an important role in delivering local growth by directing regeneration and infrastructure funds from central government and the European Union. The LEP also provides economic leadership within their area, centred on the M3 corridor, through their Strategic Economic Plan 2014-2020⁶.

What is the 'duty to cooperate' and how can it be met?

I.29 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of local plan preparation, in relation to strategic cross-boundary matters. What constitutes 'strategic cross-boundary matters' will depend on the circumstances, but these are likely to include any development that would have a significant impact on at least two planning authority areas, in particular in connection with strategic infrastructure. For example, the overall housing requirements of a housing market area would constitute a strategic cross-boundary matter, since housing markets operate across administrative boundaries.

I.30 Government guidance is very clear that the duty to cooperate is not a duty to agree. However, the NPPF emphasises that local planning authorities will need to make strenuous efforts to achieve effective cooperation on strategic cross-boundary matters, before local plans are submitted for examination. It is left up to local authorities to decide how best to meet the duty, but the stress is on the need for a continuous process of engagement from initial thinking about the local plan to its submission for examination. The objective of this engagement should be the development of a set of deliverable and effective policies covering the strategic cross-boundary matters. These may set out within a joint local plan document or they may more simply be supported by evidence of successful joint working and coordination, such as a memorandum of understanding.

I.31 At the examination of a new Local Plan, the Council will need to demonstrate how it has complied with the duty. The legislation also requires local planning authorities to provide details of the actions they have undertaken to meet the duty within their Authority Monitoring Report that is produced at least once a year and placed on the Council's website.

What are the stages involved in producing a new Hart Local Plan?

I.32 The legislation sets out a number of prescribed stages in the process of local plan production:

⁶ [Strategic Economic Plan March 2014](#) (Enterprise M3 Local Enterprise Partnership, March 2014)

Table I.1: Key Stages in Local Plan Production

Local Plan Production Stage	Sustainability Appraisal / Strategic Environmental Assessment
<p>Initial evidence gathering This stage may overlap the following stage but is the necessary start point to developing a plan. In addition to gathering evidence, this stage would involve setting objectives for the Local Plan and undertaking early engagement with key stakeholders.</p>	Developing a scoping report and baseline data on environmental, social and economic issues and establishing a framework of sustainability objectives to test the emerging local plan against.
<p>Developing the local plan This stage can be used to prepare an 'issues and options' type approach, or a more worked up draft of the local plan, or both. This stage must include initial public consultation, consistent with the adopted Statement of Community Involvement. This is a key stage for undertaking duty to cooperate engagement.</p>	Emerging options being considered as part of this stage should be tested against the framework of sustainability objectives. Sustainability Appraisal work undertaken should also be consulted on (see Interim Sustainability Appraisal Report published alongside this paper).
<p>Publication of the Local Plan When the Council is satisfied that the Local Plan is ready to be examined, it needs to be published for at least 6 weeks public consultation.</p>	A Sustainability Appraisal Report needs to be published for consultation alongside the publication draft of the Local Plan.
<p>Submission to the Secretary of State The publication draft the Local Plan is submitted to the Planning Inspectorate (on behalf of the Secretary of State) alongside the completed evidence base, any representations made, and a summary of the representations received at the previous stage.</p>	The Sustainability Appraisal Report will be submitted alongside the Local Plan.
<p>Independent Examination An independent inspector appointed by the Secretary of State examines the Local Plan to check that it is legally compliant and 'sound'. During the examination, Hart District Council may request modifications to the Local Plan, although these will need to be consulted on where they are not minor changes.</p>	The Sustainability Appraisal Report is examined to test for legal compliance and to ensure that it has informed production of the Local Plan.
<p>Adoption of the Local Plan Following receipt of the Inspector's report that recommends adoption (which may or may not be subject to plan modifications), the Council may adopt the Local Plan. At this point it becomes a part of the Hart's statutory development plan.</p>	Following adoption of the local plan, a 'Sustainability Appraisal post adoption statement' is produced and placed on the Council's website.
<p>Monitoring The implementation of the Local Plan must be monitored against the indicators and targets set out in the plan.</p>	Monitoring should also be undertaken sustainability appraisal indicators to test the plan's sustainability performance.

What will the 'independent examination' involve?

I.33 Submission of the Local Plan marks the start of the examination process and it concludes when the Inspector's report to the local authority has been issued. The purpose of the examination is for the Inspector to assess whether the Local Plan has been prepared in line with the relevant legal requirements, including the duty to cooperate, and whether it meets the tests of 'soundness' contained in the NPPF. This means that the Local Plan is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

I.34 During the examination the Inspector may be asked by the Council to recommend modifications to the Local Plan to address any issues with soundness or procedural requirements that have been identified. The Inspector may only recommend modifications if they are asked to do so by the Council itself. However, if the Inspector identifies any fundamental issues with the plan that cannot be addressed by modifications, they may recommend that the Council should not adopt the plan.

How long could the whole process take?

I.35 The Council sets the timetable for the Local Plan, within the legal requirements of the process. Local plans take a long time to prepare due to the need to develop a robust evidence base and because of the strict procedures laid down in law covering how local plans need to be produced. Nevertheless the Council is preparing the plan as quickly as is possible. It aims to consult the public again on a draft plan early in 2015, with publication and submission later that year and adoption in 2016.

How far ahead should the new plan look?

I.36 National planning policy states that local plans should preferably have 15 years of life from the date they are finished. An end date of 2032 for the plan is proposed to ensure that by the time it is adopted, it looks ahead at least 15 years. However it will need to be reviewed well before that date to move the planning horizon forward.

SECTION 2: OUR DISTRICT AND THE ISSUES WE FACE

Overview

- 2.1. Hart District has a population of 92,200⁷ and covers some 21,500 hectares in north-east Hampshire, bordering both Surrey and Berkshire. Hart is a predominantly rural district, comprising a collection of diverse and distinct settlements that straddle several employment and housing markets with no single focus.
- 2.2. The east-west corridors of the London to Southampton railway, the M3 and the Basingstoke Canal subdivide the District. The main towns are Fleet and Church Crookham, Blackwater and Hawley, and Yateley. Hook, Odiham, Crondall and Hartley Witney are the larger villages in the District whilst other settlements are mainly small, dispersed villages and hamlets. The main settlements have grown significantly over the past 30 years, largely through low density, greenfield development. Whilst Hart's larger settlements have a largely suburban character, the rural nature of the District presents some distinct challenges.
- 2.3. Fleet is the largest administrative, retail and commercial centre within Hart District and as such includes a significant proportion of Hart's employment opportunities. The town has evolved to include large residential areas on all sides, most of which have been built in the last 25 years. Yateley, Blackwater and Hawley have similarly expanded over the past 30 years but are more dispersed.
- 2.4. The District has a varied and highly valued landscape embracing heathland, historic parkland, forestry, woodlands, pastoral farmland, open downland and river valleys. Several meandering river valleys cut across the central part of the District including the Whitewater and Hart. The Blackwater Valley forms the county boundary between Hampshire, Berkshire and Surrey. The overall quality of the landscape of Hart is high in comparison with many other parts of the South East, and therefore even those areas of lesser quality in Hart still generally represent areas of attractive countryside in the wider context.

Key Issues

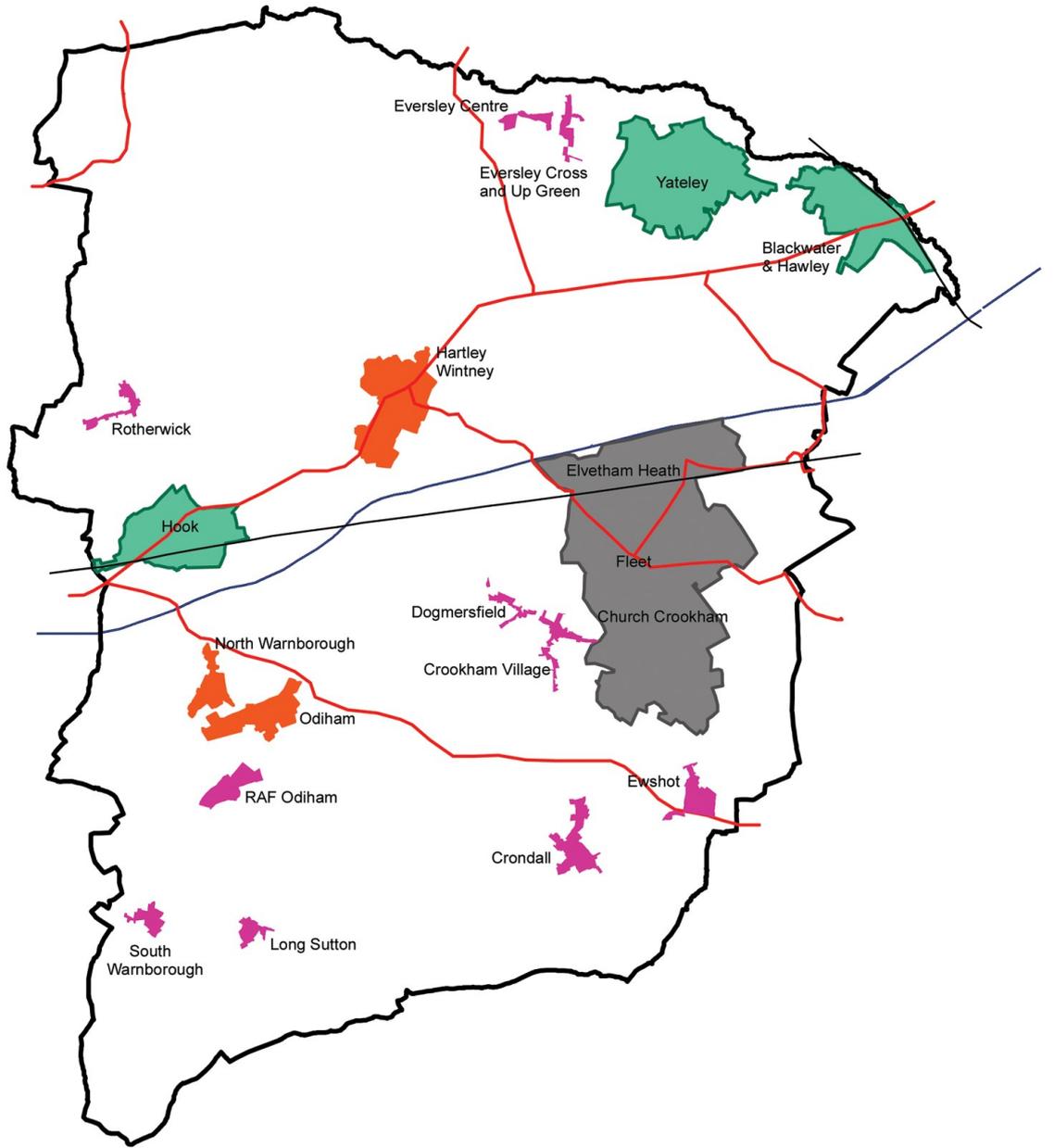
- 2.5. The Core Strategy Pre-Submission Version published in November 2012 (subsequently withdrawn) identified key issues facing the District, which were then addressed through a set of objectives building on strategic priorities and a vision for the area. The key issues have been identified through a desktop review of the updated available evidence base, and are summarised below.

Environmental

- 2.6. The need to protect and enhance biodiversity, including the protection of sites designated for their ecological importance is a key issue in the District. The District contains large, albeit sometimes relatively fragmented, areas of protected habitats, the most significant of which is the Thames Basin Heaths Special Protection Area (SPA). The SPA covers large swaths of the north-eastern part of the District and is protected under the EU Habitats Directive. It consists of tracts of heathland, scrub and woodland, once almost continuous, but now fragmented into separate blocks by roads, urban development and farmland across Hampshire, Berkshire and Surrey.

⁷ [Nomis](#), 2012

Figure 2.1: Hart's Settlement Hierarchy



N

1:95,000

Key

- | | |
|---------------------------------|---------------|
| Main Urban Area | Hart District |
| Primary Local Service Centres | A Roads |
| Secondary Local Service Centres | M3 Motorway |
| Main Villages | Railway |

This map is based on Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. HDC 100019202.

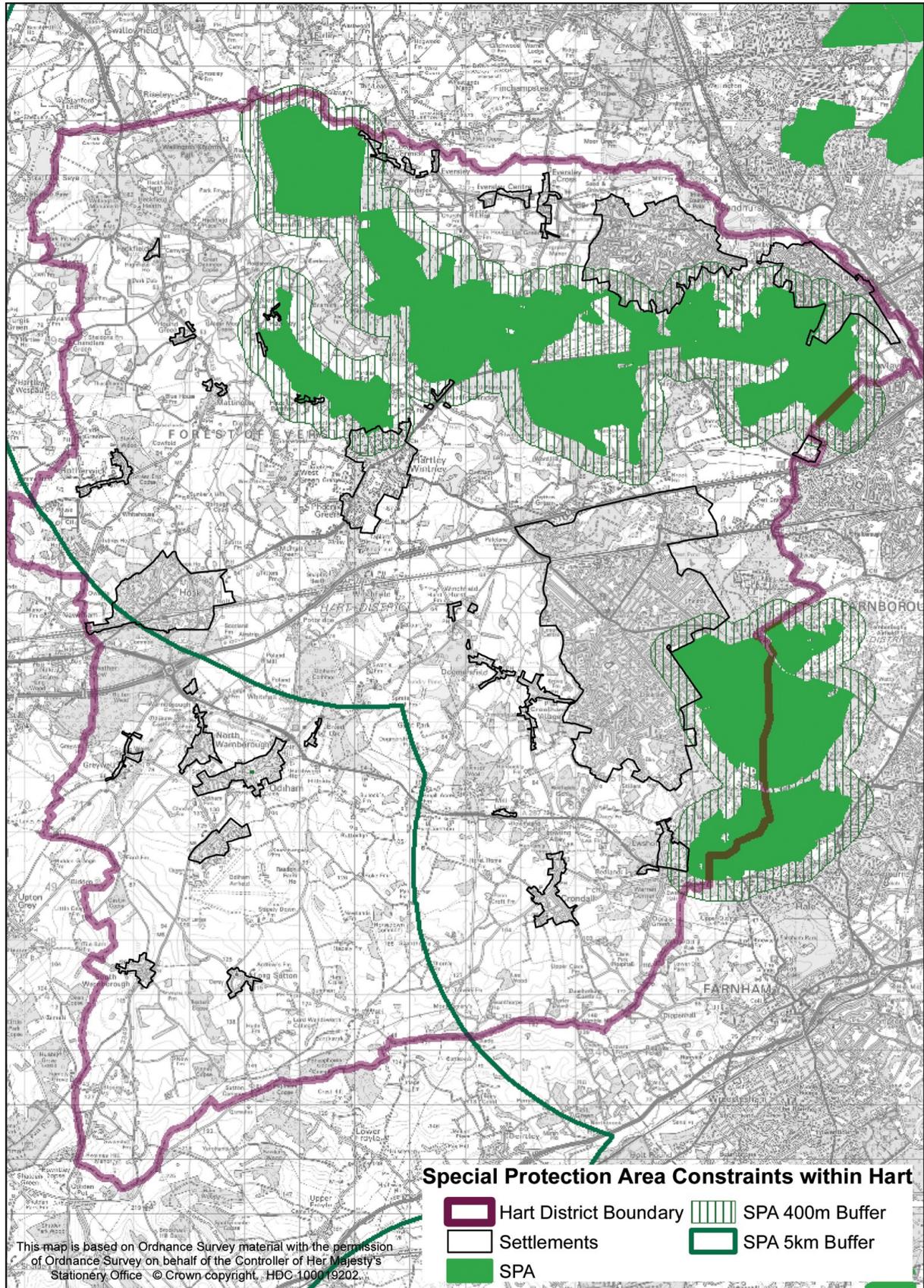
- 2.7. In 2005 research indicated that the existing level of recreational pressure was having a detrimental effect on the three species of Annex I birds for which the SPA was designated⁸. These birds are subject to disturbance from people and pets using the SPA for recreational purposes and this affects their breeding success.
- 2.8. Development can therefore potentially have an adverse effect on the integrity of the SPA and in 2005 Natural England proposed a strategic approach for the planning of housing development, linked directly to delivering effective conservation of the SPA. As such the SPA designation has a major impact upon the potential for development within the SPA and adjoining areas, because new development must demonstrate that it will not harm the integrity of the SPA. The 'general presumption in favour of sustainable development'⁹ does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.
- 2.9. A 400m exclusion zone exists around the SPA where it is accepted that it is not possible to avoid an adverse impact on the SPA from housing development. Approximately two thirds of the District lies within 5km of the SPA and almost all of the populated areas of the District lie within 7km. This constraint therefore has the potential to restrict the availability of housing land in the District, which presents challenges given the need to make provision for new homes in the area.
- 2.10. Hart's Interim Housing Strategy (published in the absence of a local plan) sets a cap on residential development within the SPA's zone of influence (5km) at 4,400 additional dwellings, based on the South East Plan housing figure for Hart between 2006-2026¹⁰. Of this cap, headroom remained for only 468 additional dwellings in May 2014. To facilitate residential development within the zone of influence the Council adopted an Interim Avoidance Strategy, which enables developers to contribute towards off-site Suitable Alternative Natural Greenspace (SANG). Two SANGs are contained in the strategy, each providing capacity to mitigate new housing development. In light of the further research being undertaken by the Council into the capacity for additional housing within the 5km SPA zone of influence (see Appendix A), the need for a cap on new housing and the extent of any cap will be assessed and this will be reflected in the new local plan.
- 2.11. In addition to the SPA there are a large number of sites of national and local importance including Sites of Special Scientific Interest, National and Local Nature Reserves and Sites of Importance for Nature Conservation. These include a number of Commons including Odiham and Hazeley Heath, which, whilst representing valued amenities enjoyed by the community, represent challenges in terms of managing development, recreational pressure and biodiversity. There is a strong expectation placed on the Council by Hart residents to maintain the high quality of the natural and historic environment of the District.
- 2.12. Reducing the probability and impacts of flooding remains a key issue for the District, with public awareness heightened as a result of flooding affecting a number of Hart villages including Dogmersfield and Crookham Village during January 2014. Hart's rivers and standing water bodies act as a constraint on development, not just for flood risk reasons, but because there is a need to protect them from the effects of development on their ecological quality. The need for development to be safe from flooding is a key issue. The main rivers are: the River Blackwater, which runs along the length of the Hart and Surrey/Berkshire boundary; the River Whitewater, in the west of the district; and the River Hart which runs northwards through the centre of the district. All these rivers run northwards towards the River Thames.

⁸ [Thames Basin Heaths: A new approach to housing allocation and nature conservation](#) (English Nature, 2005)

⁹ [National Planning Policy Framework](#) (DCLG, 2012)

¹⁰ South East Plan figures are used for this purpose as they represent the most recent housing requirement figure for Hart District that has been subjected to a plan-level Appropriate Assessment. The new Local Plan will be based on meeting up-to-date 'objectively assessed housing needs' and will undergo a plan-level Appropriate Assessment. It will not rely in any way on those parts of the South East Plan that have now been revoked.

Figure 2.2: Thames Basin Heaths Special Protection Area



- 2.13. Reducing the probability and impacts of flooding remains a key issue for the District, with public awareness heightened as a result of flooding affecting a number of Hart villages including Dogmersfield and Crookham Village during January 2014. Hart's rivers and standing water bodies act as a constraint on development, not just for flood risk reasons, but because there is a need to protect them from the effects of development on their ecological quality. The need for development to be safe from flooding is a key issue. The main rivers are: the River Blackwater, which runs along the length of the Hart and Surrey/Berkshire boundary; the River Whitewater, in the west of the district; and the River Hart which runs northwards through the centre of the district. All these rivers run northwards towards the River Thames.
- 2.14. Other parts of the District, particularly in the north, in Fleet and Crondall, experience surface water flooding due to poor land drainage and soil conditions, and there are also fluvial and, potentially, groundwater flooding issues in other parts of the District. Culverted watercourses within the main urban areas can also pose a constraint to development.
- 2.15. Areas within the catchment with the most documented flooding problems include Crondall, Eversley and Yateley; however, flooding is not restricted to these areas. Within the Whitewater and Hart river catchments, Flood Zone 2 (Medium Probability) mainly affects rural areas and smaller settlements. A residential area within Blackwater, and part of Yateley is within Flood Zone 3a (High Probability) however along the rivers Whitewater and Hart, the land within Flood Zone 3a is mainly undeveloped, barring some isolated properties and small development. Generally, areas in Hart District within Flood Zone 3b (Functional Floodplain) are undeveloped.¹¹
- 2.16. The need to deal with climate change both in terms of mitigation and adaptation is a challenge for the District, which currently has the highest current energy demands in North Hampshire, and significantly higher than the average for the South East. A fairly low density housing mix across rural locations results in fairly high use of high-carbon fuels including coal and oil¹², and efforts should be made to switch fuel users to lower carbon fuels where possible. The District does however have a modern stock of homes and energy efficiency levels are higher than national averages. The potential for renewable energy has been identified, notably for wind energy, biomass, district heating with CHP, micro generation in existing development, and on site generation in new development.
- Social*
- 2.17. Hart remains a popular place to live with low unemployment, low crime rates, good primary and secondary schools and a generally active, healthy population with high participation in sport and leisure. The 2010 Index of Multiple Deprivation sees Hart top of the rankings as the least deprived district in the country.
- 2.18. The rate of population growth has slowed in Hart during recent years and the latest projections expect the majority of future growth to be in older age groups. The increase in the population of the working age group is likely to be low.
- 2.19. Like much of the South East, property values in Hart are high, and a lack of affordable accommodation and the need to make provision for new homes is a key issue within the District. The average property price in Hart is very high at £371,000¹³ higher than the South East Region¹⁴ (£288,700) and the national average (£252,000) (based on 2013 figures). Over the five-year period 2008 to 2013, the average property price in Hart increased by around 32%. Latest figures¹⁵ show an average household income in Hart of £52,900. This is significant given that distributions of household income collectively across the Hart, Rushmoor and Surrey Heath Housing Market Area show that around one quarter of households have an income below £20,000 with a further fifth in the range of £20,000 to £30,000.

¹¹ Blackwater Valley Strategic Flood Risk Assessment (Capita Symonds, 2008)

¹² North Hampshire Renewable Energy and Low Carbon Development Study (Aecom, 2010)

¹³ Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (Wessex Economics, 2014)

¹⁴ The South East Region excluding London.

¹⁵ As above.

- 2.20. Evidently, the number of households unable to afford access to the housing market in Hart District is high and the high prices therefore exclude many families and single person households seeking access to local housing. Whilst the housing stock within Hart District is generally of high quality, there is a higher proportion of larger dwellings in Hart than other areas of the Blackwater Valley. This relative lack of smaller units of accommodation can place limits on the ability of entrants to the housing market to rent or buy property within the District, with a resultant out-migration of the young economically active.
- 2.21. There is considerable demand for affordable housing across the District and the annual level of outstanding affordable housing need has exceeded the full annual housing allocation in recent years¹⁶. Attention is therefore required not just to the *number* of houses required to support population and employment growth but also the *type* of houses, to ensure that they are affordable. A viability study undertaken in 2011¹⁷ highlighted that affordable housing policies will need to allow for scheme specific consideration of viability issues, given distinct housing market value areas in Hart.
- 2.22. Hart's ageing population is a significant issue for the District, whereby it is likely that the number of people who live in institutions, particularly care homes, is going to increase. Within the older age group, the numbers of people aged 85+ is predicted to grow by 1,790 people (88.9%) up to 2026. Given the resource demands often associated with very elderly people, these are significant figures and there is a continued need to address the care and support needs of this section of the community. Hampshire County Council predict that by 2025 substantial investment in Extra Care units is required due to the projected growth in the over 75 population¹⁸.
- 2.23. Local services and facilities play a key role in contributing towards the health and vitality of communities and quality of life. Given the rural nature of the District, the loss of community facilities is a key issue and there have been concerns in recent years regarding the steady loss or reduction in local services. This can lead to social exclusion for members of local communities without access to a car. There is potential for the new Local Plan to provide a positive framework to facilitate the development and delivery of services and facilities including those relating to education, culture, sport, health and wellbeing.
- 2.24. Since the Pre-Submission Core Strategy was produced, Hart has updated its evidence on the future need for gypsies, travellers and travelling showpeople. Although the study highlighted a potential need for as many as 24 additional permanent residential pitches during 2012-2017, it was emphasised that the evidence remains uncertain and the actual need may be significantly lower than this figure. The study also concluded that two additional transit pitches were likely to be required over the same period, although these could be provided as part of a wider strategy involving cooperation with other authorities. The needs for the District's travelling showpeople sites are also evolving and the study recommended that policy takes account of shifting needs.

Economic

- 2.25. Hart District performs well in terms of economic activity. In 2011 Hart was home to 92,000 people, of which eighty two per cent of those aged between 16-64 were economically active, a figure that is above average both regionally and nationally. Unemployment rates are low at three per cent, compared to an eight per cent national average¹⁹. Benefit claimant rates in the District are very low when compared to Hampshire, the South East and England²⁰. As at March 2014, claimant rates in Hart were 0.8% of the working age population compared to a UK rate of 2.9%.
- 2.26. Earnings in Hart are high, with gross weekly pay for full time workers averaging £671, exceeding both the regional average of £560 and national average of £518. Skill levels are also high with forty nine per cent of the working age population having higher-level qualifications (NVQ level 4 and above), compared to a national average of thirty five per cent.

¹⁶ Based on 2008 figures in Housing Needs Survey (DCA, 2008)

¹⁷ HDC Affordable Housing Viability Study (Three Dragons, 2011)

¹⁸ [Hampshire Strategic Infrastructure Statement \(Version 1\)](#) (Hampshire County Council, February 2013)

¹⁹ [Nomis](#) figures January 2013-December 2013

²⁰ Hart District Profile (SQW, 2011)

- 2.27. Across the 35,000²¹ employee jobs in Hart, key employment sectors include financial and business services, including knowledge based employment, and a particularly important computing services sector covering hardware/software consultancies, data processing and maintenance and repair. ICT, digital media, pharmaceuticals, hotels and catering and post and telecommunications sectors are also strong relative to the regional picture. An exceptionally high number of the District's economically active population work in professional, managerial or senior occupations, although a significant number of these jobs are likely to be located outside of Hart. Although twenty per cent of the District's employees work in the broad financial and business services sector, Hart is relatively less strong in this sector than the rest of the South East.
- 2.28. Public sector jobs account for around a quarter of the jobs held by Hart residents, raising issues of vulnerability to general public spending cuts. Defence related spending cuts are also a concern, with defence also providing a source of local employment and a reliance of many businesses on defence related contracts. A number of MoD facilities exist in the District, but the potential for further review of MoD facilities remains as a continuing risk for Hart.
- 2.29. In 2009 there were estimated to be around 4,800 businesses in Hart, with the finance and business services sector accounting for over a third. Computer services and the construction sector also account for many businesses. Over eighty per cent of enterprises in Hart District are small (fewer than five employees). The facilitation of growth of these businesses into larger, more sustainable enterprises is a key challenge for the District, including ensuring a sufficient supply of suitable floorspace.
- 2.30. A recent economic area analysis for Hart²² has identified that there are a number of nested geographies that relate to different aspects of Hart's functional economic area. As a result, the District has a very open economy with a particularly high rate of net out-commuting by residents. Around sixty per cent of the resident workforce commutes out of the District to work, mostly to Rushmoor, Surrey Heath and London. The District is likely to remain susceptible to high levels of out-commuting due to its residential desirability. High levels of out-commuting, coupled with an ageing population and low graduate retention levels means the Blackwater Valley has a relatively tight employment market.
- 2.31. The above issues are accentuated by a shortage of housing, particularly affordable housing, and an affordability gap. As such, there is a need to facilitate housing development as part of the approach to fostering wider sustainable economic growth within the District.
- 2.32. Hart falls under the Enterprise M3 Local Economic Partnership, which published its Strategic Economic Plan in March 2014²³. Whilst the Enterprise M3 area is ranked as the best performing economy in England and the LEP is ranked as the most resilient in England²⁴, the plan confirms that the Enterprise M3 area cannot offer appropriate housing to workers needed to support growth and compete with London. The LEP's Strategy for Growth identifies a number of challenges to future growth which include; the high cost location for businesses and their employees; growth of the labour force not keeping pace with business growth and exacerbated by out-commuting to London; house building not meeting needs especially for young people and rural communities; and a shortage of larger employment sites (>25ha).
- 2.33. The Enterprise M3 Strategic Economic Plan also highlights the broad investment priorities and interventions required to drive the long term and sustainable growth of the Enterprise M3 zone, including investment in priority sectors and niche technologies such as ICT and digital media. Key priorities include improving access to and from international markets, both for existing companies and to attract inward investment through the provision of potential sites for major investors.

²¹ This is based on the Annual Business Inquiry, a sample survey with a significant degree of sampling variability, meaning that the estimate of 35,000 employee jobs has a confidence range from 30,500 to 39,500.

²² Hart Functional Economic Area Analysis (Draft) (Wessex Economics, May 2014)

²³ Working for a Smarter Future: [The Enterprise M3 Strategic Economic Plan 2014-2020](#) (Enterprise M3, 2014)

²⁴ [Enterprise M3 LEP Strategy for Growth](#) (Enterprise M3, 2013)

- 2.34. In common with much of the Blackwater Valley and M3 and M4 corridors, the District currently has significant stock of vacant office floorspace, which was estimated in 2013 to amount to approximately 74,000 square metres (or 35% of the total stock)²⁵. Hart's office market is intrinsically linked with the wider sub-region and new office developments in Farnborough, Basingstoke and Reading, all of which compete with available space. An issue for Hart is the extent to which current vacancies are cyclical or more structural in nature. In the case of the latter, the need arises for a re-balancing of employment floorspace towards meeting the needs of the smaller growing businesses referred to above.
- 2.35. A north-Hampshire wide review of employment land requirements²⁶ carried out in 2008 identified that B1 and B8 floorspace currently in the supply pipeline for north Hampshire meets predicted floorspace requirements up to 2028. A flexible approach was however concluded to be necessary to provide a balance between providing enough employment land to support economic growth and preventing an over-supply of the 'wrong' type of land which can be detrimental to the operation of the property market. Hart must provide for a range of sizes and types of employment land and premises in the right locations to respond to changes in economic activity.
- 2.36. A further review in 2009²⁷ confirmed that Hart District has a reasonable but not extensive choice of sites for office development, and there are very limited sizeable sites available for industrial development. A small shortfall in industrial floorspace was predicted up to 2026, although a more recent review has found that in 2013 there were approximately 27,000 square metres of vacant industrial floorspace within Hart, which represented about 18% of the total industrial floorspace stock²⁸.
- 2.37. In respect of retail and leisure floorspace, a retail study in 2012²⁹ concluded that there is no pressing need for comparison goods floorspace up to 2026, however requirements for additional convenience floorspace were suggested to exist. There is also a need for some additional leisure floorspace (Use Classes A3-A5: Restaurants and cafes, drinking establishments and hot food take-away) up to 2021.
- 2.38. A further issue is the need for Hart to support economic growth by providing for local shopping needs in town, district and local centres to serve the needs of existing and future residents and to maintain the vitality and viability of those centres.
- Infrastructure*
- 2.39. To avoid unbalanced growth, infrastructure needs arising from development in Hart will need to be provided in a timely and co-ordinated manner which keeps pace with development. The lack of a sustainable transport network which supports growth and provides a choice of transport modes is a constraint that will also need addressing. Economic growth is dependant on infrastructure provision and the Enterprise M3 LEP confirms in its Strategic Economic Plan (2014) that continued investment in strategic transport infrastructure within and around the M3 corridor is vital to ensure network capacity and continued connectivity to national and international hubs of economic activity³⁰. Benefitting from such future investment will be important for Hart to be able to address its infrastructure needs.
- 2.40. The LEP's Strategy for Growth (2013) identifies a number of infrastructure related challenges to future growth in the M3 Enterprise area, including; unreliable transport connections by road and rail and the need for essential infrastructure investment to meet the needs of local businesses; already stretched innovation infrastructure which needs to expand if growth ambitions are to be met; and the provision of reliable high speed broadband for rural businesses.

²⁵ [Commercial Property Market Study](#) (Enterprise M3 LEP, April 2013)

²⁶ Economic Growth and Employment Land Requirements in North Hampshire (Roger Tym & Partners, 2008)

²⁷ Employment Land Review for Surrey Heath, Hart and Rushmoor (NLP, 2009)

²⁸ [Commercial Property Market Study](#) (Enterprise M3 LEP, April 2013)

²⁹ Hart DC Retail Study Update Final Report (Roger Tym & Partners, 2012)

³⁰ [Enterprise M3 Strategic Economic Plan](#) (Enterprise M3 LEP, March 2014)

- 2.41. Hart's LDF Transport Assessment carried out in 2010 predicted that based on site locations in the SHLAA 2009, widespread traffic congestion would exist on the Hart District highway network in 2026, including on access roads to the M3 junction 4A. Whilst development options will emerge during the preparation of the Local Plan, there is a wider need to ensure that new development mitigates its impacts on existing infrastructure through improvements to capacity and quality or through new infrastructure delivery.
- 2.42. Hart District has a high dependency on the private car and key challenges are to promote sustainable forms of development, reducing the need to travel. The District has good connections to the national railway, motorway and trunk road networks, particularly towards London, Basingstoke, Reading and Southampton. Local public transport provision is, however, very limited and this, combined with the rural nature of the District and lack of a network of cycle ways or footpaths, means that for many people there is simply no alternative to the use of the private car for at least part of each long-distance journey and for most local trips. Access to social, public and convenience services is essential to the health and well being of all residents. Those who live in the rural parts of the District, and those without access to a car, risk exclusion from these facilities.
- 2.43. High rates of out-commuting results in pressure on some roads and the rail network at peak times. Local congestion is experienced at peak times on key routes within and through the District, particularly in the proximity of the A30, and the M3 junctions and in Fleet town centre. An M3 corridor transport study undertaken in 2013³¹ found that the greatest impacts for Hart are predicted to occur along the A30 London Road, A327 Minley Road and surrounding roads in north Fleet.
- 2.44. The Hampshire Local Transport Plan (2011-2031) (LTP)³² contains the North Hampshire Transport Strategy (NHTS). It identifies key transport challenges for North Hampshire including out commuting, and the need to secure investment to improve capacity and journey time reliability on strategic national corridors, including the M3 and A34. The LTP sets local objectives including supporting the sustainable growth of the local economy by providing the strategic transport network responsible for its economic success. Specific measures include targeted measures to improve capacity and optimise management of the highway network at Fleet, and improvements to Fleet railway station. Measures for smaller settlements within the District including Yateley, Odiham and Hook comprise investment in developing walking and cycling, traffic management measures and improved inter-urban bus services.
- 2.45. In addition to the need to secure the transport infrastructure necessary to support economic development, the Enterprise M3 LEP highlights limited access to high-speed broadband and mobile internet as a constraint to home-working, which serves to add strain to the road network.
- 2.46. Hampshire County Council has identified requirements for investment required in infrastructure on a District basis³³. For Hart, along with transport infrastructure improvements, this also includes school requirements. A number of primary schools in the District require expansion to accommodate both natural population growth and the increase in population in the catchment of schools already under pressure. Two secondary schools require investment to meet existing and potential future demand for pupil places in Odiham and Fleet.
- External Pressures and Opportunities*
- 2.47. The Localism Act 2011 placed a duty on Local Authorities to co-operate to ensure that planners look beyond their own boundaries when addressing need for development. What this means for Hart as the new Local Plan is prepared is set out in Section 1 above. However, national planning policy³⁴ sets a strong emphasis on the need for planning strategically across local authority boundaries, including potentially meeting the unmet housing needs of neighbouring authorities. Given this emphasis and the high level of need and demand for additional housing across the North East Hampshire / West Surrey Housing Market Area (see Section 3 below), there is the potential for

³¹ Transport Assessment for the M3 Corridor J3-4a Joint LDF Study (Surrey County Council, 2013)

³² [Hampshire Local Transport Plan \(2011-2031\)](#) (Hampshire County Council, 2013)

³³ [Hampshire Strategic Infrastructure Statement \(Version 1\)](#) (February 2013)

³⁴ Paragraphs 178-182 of the [National Planning Policy Framework](#) (DCLG, March 2012)

increasing pressure to be applied to Hart District to accept housing requirements that one or more of its neighbouring authorities may not be able to meet.

- 2.48. This pressure is balanced to some extent by opportunities, including those created by recent investment decisions that are likely to help Hart's neighbouring authorities to deliver a number of strategic growth projects, including significant housing development. The decision by the Enterprise M3 LEP within its Strategic Economic Plan to designate Farnborough as a 'Growth Town' and Camberley and Aldershot as 'Step-up Towns' is important as it is followed by significant targeted funding, for example, to unlock infrastructure barriers or improve town centres. This investment is intended, in part, to help Rushmoor and Surrey Heath to achieve their housing delivery requirements, and in particular the Aldershot Urban Extension (Rushmoor) and the Princess Royal Barracks development at Deepcut (Surrey Heath). Although Hart did not benefit directly from the current round of Enterprise M3 investment decisions, there is a clear indirect benefit for Hart in any decisions that help the Housing Market Area as a whole to boost housing delivery.
- 2.49. Beyond Hart's immediate neighbours, there is a very significant level of housing need and demand within the Greater London housing market that the London Boroughs are unlikely to be able to meet in full. This has given rise to recent indications that the Mayor of London and the Greater London Authority are looking well beyond London to the wider 'home counties', influenced by London's housing market, in order to help meet the Capital's housing needs³⁵.
- 2.50. It is too early at this stage to be able to judge whether any neighbouring authority or indeed London will seek to approach Hart in order to help meet their housing needs. However, this is a risk that will remain throughout the Local Plan preparation process.

Strategic Vision and Priorities

- 2.51. Hart District Council developed a vision for Hart, informed by engagement with the local community, and this was set out within the now withdrawn Core Strategy Pre-Submission (2012) version. This vision focused on retaining the essential characteristics of the District, including respecting the separate character and identity of Hart's settlements and landscapes. Focus was placed on accommodating growth sensitively and delivering infrastructure to support growth through section 106 contributions and CIL. There was also a vision to ensure that quality of life within the District remains high, and that the challenges of an ageing population would be addressed, including the vision to retain larger numbers of younger people and families to help support older communities. The vision also included aspirations for improving local transport infrastructure, recreation facilities and open space.
- 2.52. Given that the key issues for Hart are generally reaffirmed by the various updated evidence studies, the vision as set out in the Pre-Submission Draft Core Strategy appears an appropriate starting point for preparing the new Local Plan. However, some further consideration of the vision for Hart is needed in a number of respects, not least, the aspiration to balance development and community needs with the protection of the environment and the rural nature of the District.
- 2.53. It will also be necessary that the challenges and strategic actions identified by the Enterprise M3 LEP are taken into account and fed into the new vision for the District. It is important that Hart is in a position to benefit from future strategic planning initiatives emerging from the LEP in order to support economic growth and the vitality and viability of Hart's settlements, especially given the rural context of the District and its aging population. Notably, the LEP's strategic actions are likely to continue focussing on establishing an effective housing development strategy and addressing congestion, especially in respect of road and rail infrastructure.
- 2.54. Given issues of housing affordability across the District, the future strategic priorities for Hart may need to place more weight on meeting housing provision, notably in respect of affordable housing

³⁵ The Mayor of London wrote to Bedford Borough Council in March 2014 advising that the preparation of their new Local Plan needed to take into account the likely inability of London to meet its own housing needs.

that meets all sectors of the community, including the young economically active population to support labour markets. This is reiterated by the conclusion of the Enterprise M3 LEP Strategic Economic Plan which notes that the Enterprise M3 area is not currently able to offer appropriate housing to the workers needed to support growth and compete with London.

- 2.55. The social role of the planning system in providing housing to meet present and future generations is also reiterated by Government as a fundamental strand of sustainable development³⁶. The NPPF is underpinned by the presumption in favour of sustainable development and highlights the need for local planning policies to plan positively to support local development and seek opportunities to meet the development needs of the area. Again this highlights the need for the new Local Plan to set a positive vision for the future of Hart, finding a balance between meeting development and community needs and conserving and enhancing the character and environment of the District.
- 2.56. The 2012 vision envisaged that Hart will play a full role in reducing carbon emissions and it is likely that future strategic priorities should draw upon the identified potential for renewable energy within the District, especially given Hart's high energy demands and use of high carbon fuels. It is however recognised that Hart has high levels of energy efficiency and this should continue to be supported.
- 2.57. As indicated above, the vision and strategic priorities for Hart are likely to evolve as the new Local Plan is prepared. The extent and direction of change will depend in part on the nature of the options and alternatives selected, including the options set out within this document. Consultation on this document forms an essential part of that process.

³⁶ [National Planning Policy Framework](#) (2012)

SECTION 3: ASSESSING THE GROWTH AND DEVELOPMENT WE NEED TO 2032

Introduction

- 3.1 Given the range of issues set out in the previous section, Hart faces a real challenge over the coming years that must be addressed directly within the new Hart Local Plan. The challenge centres on how the need for growth and housing can be met in a sustainable way and how the infrastructure issues can be resolved, without compromising the attractiveness and high quality environment or the good quality of life that is enjoyed by those who currently live in Hart.
- 3.2 The main purpose of this paper is to set out the range of options that are currently being considered by the Council to deliver the housing that will be needed in the coming years. These options are set out in the next section of the paper. In this section however, the total amount of growth required is considered by reviewing the available evidence. This looks initially at Hart's housing requirements to 2032 and goes on to consider, as far as is currently known, the need for additional employment land and the need for additional infrastructure to support current and future development.

Housing Requirements

- 3.3 Over the past decade an average of 300 new homes per year have been delivered across Hart. This is in spite of a very severe national decline in house building seen during the recession from 2008 until 2011. Many of the new homes have been delivered on previously developed 'brownfield' land within or at the edge of our settlements, including opportunities provided by the release of Ministry of Defence land, such as at Queen Elizabeth Barracks adjacent to Church Crookham, which is currently being redeveloped.
- 3.4 Looking to the future, more housing will be required and the new Local Plan will have to plan for this. The main drivers behind the need for additional housing include:
- The natural growth in Hart's population;
 - The continuing trend for people to live in smaller households;
 - The need to provide housing for 'concealed households' prevented from buying a home during the recession, due to constraints placed on mortgage lending;
 - The attractiveness of the District as a retirement location;
 - The need for more homes to balance projected future increases in the number of jobs available within Hart and to support labour mobility;
 - The need to ensure a sufficient supply of new affordable homes to meet the needs of those who cannot access market housing in Hart.
- 3.5 The pressing need for more housing is not something that can be ignored, or put to one side as something too difficult to deal with. Government guidance, within the NPPF, is very clear that local authorities have to robustly identify their '*objectively assessed housing needs*' and then have to plan positively in order to meet these needs in full; although this is qualified with the proviso '*...as far as is consistent with the policies set out in this Framework*'³⁷ which accepts that housing delivery is not 'at all costs'.
- 3.6 In addition to national policy, the Enterprise M3 Local Enterprise Partnership (LEP), which represents business interests and is charged by the Government with promoting economic growth, has recently prepared its Strategic Economic Plan³⁸. This is a document that local authorities are expected to 'have regard to' in preparing their local plans. It provides a clear statement that local authorities within the

³⁷ [NPPF](#), Paragraph 47

³⁸ [Strategic Economic Plan 2014 – 2020](#) (Enterprise M3 Local Enterprise Partnership, March 2014)

LEP area such as Hart are expected to play their part in helping to boost housing supply, up to 25% above the baseline for the previous decade, in order to support economic growth and avoid a lack of housing (or its unaffordability) becoming a barrier to investment and job creation.

3.7 The nature of housing markets and 'travel to work areas' is such that it does not make sense for local authorities to plan exclusively on the basis of their own needs and ignore what is happening beyond their borders. The NPPF and the statutory 'duty to cooperate' acknowledge this and require authorities work together to resolve key strategic issues, which includes housing requirements. The NPPF specifically tasks authorities with using housing market areas as the basis for understanding requirements and it expects local authorities within a housing market area to work together to meet the full housing requirement, once identified.

3.8 Reflecting the emphasis within national policy, Hart District Council has been working with both Surrey Heath and Rushmoor Borough Councils to identify housing requirements across the North East Hampshire / West Surrey Housing Market Area (HMA), which comprises the area administered by the three local authorities. The HMA is centred on the Blackwater Valley with its distinctive characteristics and highly integrated labour and housing markets. The majority of the populations of Hart and Surrey Heath, as well as the entire population of Rushmoor, live within the Blackwater Valley area, which makes a HMA centred on this area very relevant for considering future housing requirements.

Strategic Housing Market Assessment

3.9 Working together with Surrey Heath and Rushmoor, an important new evidence study, called a Strategic Housing Market Assessment (SHMA)³⁹, was completed for consultation in May 2014. This study looks in detail at the likely future housing requirements across the HMA and establishes the 'objectively assessed housing needs' required by the NPPF. The SHMA achieves this by considering a range of evidence and projections, drawn from official sources that, in combination, are likely to determine future housing requirements. These factors include:

- The latest Government population and household projections, which the SHMA updates with latest available figures on migration and rates of household formation;
- Projections and forecasts for job and employment growth in the future, including taking account of the recent strategic economic planning undertaken by the Enterprise M3 Local Enterprise Partnership;
- An assessment of existing and likely future affordable housing requirements across the HMA; and
- Analyses of various housing market signals that may impact on the future supply or demand for new market housing.

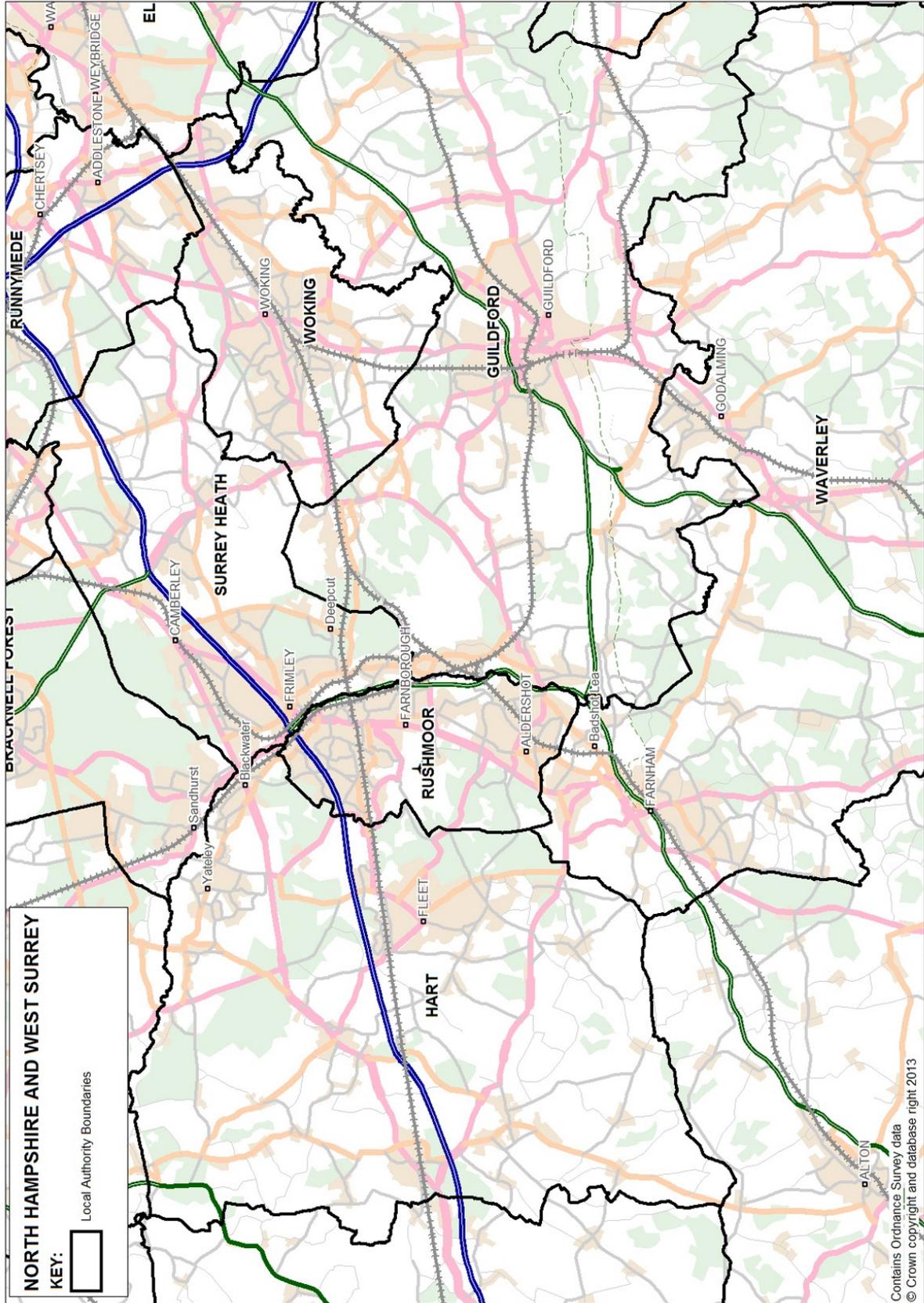
3.10 The SHMA assessment of the latest and updated demographic projections was undertaken with the 2011 Census as a starting point and covered the period to 2036. Given that Hart's new Local Plan is likely to extend to 2032, the analysis below is for the period 2011 to 2032, which means that figures cited here will be somewhat different from those reported in the SHMA itself.

3.11 Based on the updated demographic projections alone (in other words, with no account taken of likely future employment growth) the population of Hart District is projected to increase by about 15,000 between 2011 and 2032. This would take the District's total population to approximately 107,000 people, an increase of about 16% over the period. On this basis the SHMA considered that the projected additional housing requirement for 2011 to 2032 within Hart would be 7,030 or an average of 335 per year.

3.12 As a subsequent step in calculating the objectively assessed housing need, the SHMA considered a range of employment growth scenarios. This is important because increasing numbers of jobs and employment in an area are likely to lead to pressure for more housing as some people will need to move to the area to take up employment. Likely continued increases in rates of economic activity were also taken into account. Overall, if the level of housing supply is not in balance with employment growth, shortages of housing could lead to unsustainable long-distance commuting patterns. This will ultimately put employers off from locating within the HMA, with a negative consequential impact on economic development for the HMA.

³⁹ Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (Wessex Economics, June 2014)

Figure 3.1: North Hampshire and West Surrey
(Source: Wessex Economics)



- 3.13 Having considered the possible employment growth scenarios, the SHMA concluded that a central scenario (called 'proactive planning for growth') was the most robust. This scenario projected higher employment growth than that seen in the recent (pre-recession) past, but not as high as that projected by the Experian job-growth forecasts, which provide a nation-wide indication of likely growth in employment and in self-employment, split down by local authority area.
- 3.14 The effect of applying the employment growth scenario is that the overall housing requirement for Hart increases by a total of 504 homes during the 2011 to 2032 period to 7,534; or an average of 359 per year.
- 3.15 The SHMA also considered the evidence on existing and future need for affordable housing. Overall, the SHMA demonstrated a substantial level of housing need within Hart and across the wider HMA. In assessing future requirements for affordable homes to 2032, the main consideration is the period over which the substantial existing unmet need (about 1,700 households in Hart's case) should be addressed.
- 3.16 An objective of a new Hart Local Plan will be to meet this existing requirement over time, in addition to meeting the on-going level of 'newly arising need' throughout the plan period. However, if the existing need is addressed over a five-year period, often considered to be best practice, the effect on the annual requirement for additional affordable housing is dramatic, amounting to an additional 260 affordable homes being delivered within Hart each year over this five year period. Even if Hart managed to secure 40% of all new homes as affordable housing, which would represent a very optimistic level of affordable housing delivery, the overall housing delivery across Hart would need to exceed 650 homes per year in order to meet housing needs. The SHMA concluded that this level of housing supply would be unrealistic over a period of five years.
- 3.17 More realistic scenarios considered by the SHMA involve the HMA's existing backlog of housing need being met over a 10, 15 or 20 year period. Under these circumstances, it would be possible to address the existing backlog and the newly arising need within the overall level of housing requirement referred to in paragraph 3.14 above (359 homes per year for Hart). By way of example, if 40% affordable housing could be secured, Hart's existing backlog could be addressed in 7.7 years, or at a more modest 30% affordable housing, it might take 9.2 years. Overall, the SHMA concluded that there was no justification for uplifting the total housing requirement further in order to meet the need for affordable housing.
- 3.18 Finally, the SHMA looked at a number of relevant market and economic signals, such as rising house prices and changing housing affordability. These factors were not considered to be separate to the demographic changes and employment growth, but were taken to represent by products of the imbalance between demand and supply that has existed in the past. Therefore, as with the need for affordable housing, no uplift to the housing requirements figures were considered to be required due to market signals.

Objectively assessed housing needs (2011 to 2032)

- 3.19 The overall conclusion of the SHMA was that the Hart's 'objectively assessed housing need' for the 2011 to 2032 period was calculated from the latest demographic projections, as further updated by the SHMA. This included an uplift in numbers required to ensure that future housing requirements reflected and was in balance with the most plausible forecast of employment growth. However, keeping in mind that the emphasis of national policy and the basis of the SHMA is to work across the HMA, the table below shows the overall position, using the 2011 to 2032 period, for each of the three local authorities and the HMA as a whole.

Table 3.1: Objectively assessed housing needs for the North East Hampshire / West Surrey Housing Market Area 2011 to 2032

	Hart	Surrey Heath	Rushmoor	Whole HMA
Estimated total housing need	7,534	7,057	9,822	24,413
Average per annum	359	336	468	1,163

3.20 An important point to remember about objective assessments of housing need is that they must genuinely be 'objective', which means that they must not include any increases or decreases in the housing requirements due to policy decisions or to environmental or planning constraints. The NPPF, allows for this process of taking policy and environmental considerations into account, but this must only be undertaken after the objectively assessed need has been clearly established.

3.21 The objectively assessed housing need established above provides the starting point for determining the actual housing requirement that the plan will need to demonstrate is capable of being met. Thought also needs to be given to a range of issues that may result in a higher or lower housing target in the plan including:

- The Enterprise M3 Local Enterprise Partnership (LEP) Strategic Economic Plan;
- The evidence work undertaken by the Council into the potential future housing supply within the zone of influence of the Thames Basin Heaths Special Protection Area; and
- The need, under the duty to cooperate, for Hart to work with its neighbouring local authorities, across and potentially beyond the HMA.

Enterprise M3 LEP Strategic Economic Plan

3.22 The need to undertake strategic economic planning is an important role of the Enterprise M3 LEP and is a prerequisite for the LEP to be able to access the Government funding streams required to help the LEP achieve its economic growth objectives, set out in the 'Growth Deal'. The NPPF expects local authorities to work collaboratively with LEPs and the National Planning Guidance asks planning authorities to have regard to the activities of LEPs and to cooperate with them in their strategic economic planning role.

3.23 Enterprise M3's Strategic Economic Plan and Growth Deal were published in March 2014 and have important implications for housing delivery across the LEP area due to a commitment, agreed by the Joint Leaders Board of the LEP, that housing delivery will be accelerated in the next 10 years by up to 25% above the baseline for 2003-2013. The commitment is qualified as being dependent on Government support and it is emphasised that the acceleration of delivery will not mean an increase in overall housing targets for local authorities.

3.24 It is not yet clear whether the commitment is intended to apply equally across all fourteen of Enterprise M3 LEP's authorities, or whether it should impact more on those authority areas containing the 'growth towns' and 'step-up towns' which form the focus of the LEP's investment interventions. Within the North East Hampshire / West Surrey HMA the town of Farnborough (Rushmoor) is designated a 'growth town' and Camberley (Surrey Heath) and Aldershot (Rushmoor) are to become 'step-up towns'. No towns in Hart have received any such designation. For illustrative purposes only, Table 3.2 below compares housing delivery rates needed to meet the LEP '25% accelerated growth' commitment with delivery rates needed to meet objectively assessed need within Hart, Rushmoor and Surrey Heath.

Table 3.2: Potential impact of the Enterprise M3 commitment on HMA housing requirements 2014-2023

	Baseline - total housing completions (2003-2013)	Acceleration – Baseline + 25%	Accelerated housing delivery target per annum (2014 - 2023)	Objectively Assessed Housing Needs (annualised 2011 - 2032)	Adjustment required to achieve accelerated delivery target per annum
Hart	2,989	3,736	374	359	+15
Surrey Heath	2,032	2,540	254	336	-82
Rushmoor	3,976	4,970	497	468	+29
HMA	8,997	11,246	1,125	1,163	-38

3.25 The right-hand column of Table 3.2 shows that, overall across the HMA, the objectively assessed housing need, identified in the SHMA, is higher than the 'accelerated delivery' requirement of the LEP. This is significant as it shows that if collectively the three authorities were to plan for and deliver the full objectively assessed need of the HMA, it would more than satisfy the LEP's commitment to accelerate housing delivery.

3.26 In terms of the implications for Hart's housing requirement, it should be kept in mind that the LEP commitment applies only to the one 10-year period within the overall plan period to 2032 and that the clear intention is that overall housing targets will not be increased, only accelerated forward. This means that Hart will not be expected to deliver more than the 7,534 homes by 2032 referred to in Table 3.1.

Housing Supply within the Thames Basin Heaths Special Protection Area Zone of Influence

3.27 During the preparation of the South East Plan evidence work was undertaken into the level of additional housing that could be delivered within the 5km 'zone of influence' surrounding the Thames Basin Heaths Special Protection Area (TBHSPA), without being likely to harm the integrity of the SPA. On the basis of this work, a 'cap' of 4,400 new homes within 5km of the SPA was established for the period 2006 – 2026. Once the cap is reached, new housing within 5km of the SPA requires an Appropriate Assessment to demonstrate that there is no likelihood of significant effects upon the SPA as a result of the development. This requirement applies even if the development provides mitigation of its effects on the SPA in the form of new SANGs and measures to promote strategic access management and monitoring (SAMM). As at 2 May 2014, a capacity of only 468 new dwellings remains from the original cap of 4,400.

3.28 In order to meet Hart's future housing needs, it is clear that the current cap will need to be exceeded. However, doing so requires the new Local Plan to include an Appropriate Assessment and to be supported by evidence which clearly demonstrates that the forms of mitigation preferred by Natural England (a combination of SANGs and SAMM) are proving effective in mitigating the impact of new residential development. Given that no robust or credible evidence of the efficacy of the mitigation measures currently exists, the Council has commissioned its own evidence work to support the preparation of the new Local Plan. This is taking the form of a study on housing supply within the TBHSPA area⁴⁰.

3.29 In addition to considering whether the SANGs and SAMM measures are working, the Council's study assesses whether there is evidence to support an overall cap on new housing within 5km of the SPA, beyond which new housing would be likely to have a significant impact on the SPA, irrespective of the provision of mitigation measures. Such a cap could have a negative impact on the capacity of Hart to meet its future housing needs.

Duty to Cooperate

3.30 The previous sections of this paper have provided an overview of the requirements of the duty to cooperate. Housing requirements and options for housing delivery are key strategic issues and are therefore central to the work Hart needs to do under the duty. The joint preparation of the SHMA with Surrey Heath and Rushmoor is an important first step towards meeting the duty in relation to housing requirements. The NPPF expects collaborative working to identify housing needs across the housing market area. However, that is not sufficient on its own and the SHMA stresses that the objectively assessed housing needs figures apply first and foremost to the HMA as a whole. Even though the SHMA breaks down the requirement by local authority area, this should not be seen as 'set in stone'. This means that the SHMA estimated requirements for the whole HMA are the most important starting point, whilst those for the three individual local authorities will need to be explored through further joint working, with the objective of agreeing an apportionment of the HMA's housing requirement that each of the three authorities is comfortable can be delivered.

3.31 This process of continuing joint working is underway and a Joint Members Liaison Group has been established as a forum for the SHMA and the housing requirements of the HMA to be discussed. The objective of the group is to reach an informal agreement on what the objectively assessed housing need in each of the three local authority areas is and whether each authority is doing all it can,

⁴⁰ Prepared by Adams Hendry Consulting Ltd, Baker Shepherd Gillespie and eCountability. See Appendix A.

consistent with policies within the NPPF, to meet the objectively assessed housing needs. If the need arises, the group will also explore how cross-boundary working can help address any likely shortfalls in housing provision.

- 3.32 Given the focus of working across the HMA, an understanding is needed of the current position Hart's HMA partners are in regarding local plan preparation. This is summarised as follows:
- 3.33 **Surrey Heath Borough Council** adopted its Core Strategy for the period 2011-2028 in February 2012. This planned for the delivery of 3,240 homes, including the allocation of the Princess Royal Barracks strategic site (1,200). This site has outline planning permission and will provide a number of facilities and its own SANG solution on site. The Council has consulted on an Issues and Options version of a Sites Allocations Plan and will consult on a Preferred Options and a Submission version during 2015. This document will set out how development set out in the Core Strategy will be delivered. Surrey Heath Borough Council has challenges with regard to providing land to mitigate for the impact of residential development on the Thames Basin Heaths SPA. To this end, the Council is working with neighbouring authorities, landowners, the Enterprise M3 LEP and Natural England to secure land and funding to provide mitigation. However, this is a constraint that has to be considered in taking forward housing delivery. Based on the adopted Core Strategy, the currently adopted annual housing target for Surrey Heath, between 2011 and 2028, is **191**.
- 3.34 **Rushmoor Borough Council** adopted its Core Strategy in October 2011 to cover the period 2010 to 2027. This plan provides for 6,350 new homes, with 4,250 of these homes being delivered at the Aldershot Urban Extension (AUE), which was a strategic site proposed within the South East Plan. The remainder of the planned homes were based on locally derived evidence as Rushmoor had met its South East Plan target for the rest of the Borough outside the AUE. The Council is also preparing a further local plan, although this is at an early stage and will only be progressed once greater clarity and agreement has been reached on the Borough's objectively assessed housing needs. Since the adoption of the Core Strategy, planning permission has been granted for up to 3,850 homes at the Aldershot Urban Extension, to be delivered in the period 2014 - 2034. For the rest of the Borough an average requirement of 95 dwellings per year is needed to deliver the remaining requirement in the urban areas outside the AUE, taking account of an oversupply in the first few years of the Core Strategy. Based on the Core Strategy the currently adopted annual housing target for Rushmoor between 2010 and 2027 is **374**.
- 3.35 In order to provide an overview of the current housing supply position across the HMA, Table 3.3 below indicates the level of average housing completions in recent years and Table 3.4 shows the five-year housing supply position for the three authorities between 2013 and 2018 (the latest 5-year period for which information is available for all three local authorities)⁴¹.

Table 3.3: Recent housing completions across the HMA (2011-2014)

	Annual average completions (2011-2014)	Objectively Assessed Housing Needs (annualised 2011 - 2032)	Difference between annual average and the objectively assessed housing needs annual requirement (2011-2032)
Hart	264	359	-95
Surrey Heath	182	336	-151
Rushmoor	206	468	-262
Whole HMA	652	1,163	-511

⁴¹ The data for Hart is sourced from the Hart Five-Year Land Supply Position Statement at 14th May 2014. Surrey Heath and Rushmoor Borough Councils provided the data relating to their respective authorities. The indicative annual housing supply for Rushmoor Borough Council includes the Aldershot Urban Extension.

Table 3.4: Indicative Five-year supply of housing across the HMA (2013-2018)

	Annualised indicative housing supply (2013-2018)	Objectively Assessed Housing Needs (annualised 2011 - 2032)	Difference from objectively assessed housing needs annual requirement (2011-2032)
Hart	406	359	+47
Surrey Heath	220	336	-116
Rushmoor	299	468	-169
Whole HMA	925	1,163	-238

- 3.36 In light of the levels of housing supply currently being achieved and anticipated for the near future, it is clear that considerable work needs to be done by all three authorities in order to meet the objectively assessed housing need of the HMA as a whole, which is estimated to be 1,163 per year for the period 2011 to 2032.
- 3.37 Given the nature of environmental constraints and the stretched capacity of infrastructure, it is certain that meeting the full housing requirement will be a genuine challenge and will require some difficult and potentially unpalatable decisions. However, the best opportunity to meet the overall housing requirement lies in the continuation of the collaborative working between the HMA partners and the ability of this work to reach an agreement on how the overall HMA requirement can be met. Ultimately, this may require compromises and a willingness of each of the three authorities to help meet the overall requirement by potentially accepting more housing than the SHMA sets out as the starting point apportionment for each authority.
- 3.38 It is important to understand that any agreement that may be required for one or two of the HMA authorities to accept more housing to make up for a shortfall in the other(s) would need to be dynamic over the plan period. This means it would need to take account of the actual anticipated phasing of development, based on an understanding of when and how different specific sites might come forward across the HMA. For example, it may be that whilst one authority had a particular shortfall in the early years of its planning period, this may be possible to address in later years when other development came forward, which could help make up for a shortfall in one or both of the other authorities during that period. This would require continuing collaboration but will ensure that the approach can be fine-tuned and would be more likely to result in a mutually beneficial collaboration.
- 3.39 A further dimension is the need for Hart, either alone or in collaboration with its HMA partners, to work with its other neighbouring authorities. Apart from Surrey Heath and Rushmoor, Hart neighbours Waverley, East Hampshire, Basingstoke and Deane, Wokingham, West Berkshire and Bracknell Forest. The duty to cooperate applies to all neighbouring authorities and not only to those within the relevant HMA. Indeed, Hook and other parts of western Hart have far greater links with Basingstoke than they do with Rushmoor or Surrey Heath.
- 3.40 The need to work with Hart's neighbours, outside of the HMA, becomes particularly important if, despite strenuous efforts, the three HMA authorities conclude that they are unable to meet the overall objectively assessed housing need. However, there can be no certainty that such joint working will result in agreement by neighbouring authorities to accept any of Hart's unmet housing requirement. National planning guidance is very clear that the duty is to cooperate and not a duty to agree. Although other neighbouring authorities approached will need to work with Hart and its HMA partners, they are not obliged to accept their unmet housing needs if they have robust evidence demonstrating that this would be inconsistent with policies set out within the NPPF, including those on the need to protect the environment and landscapes of value. This guidance works both ways of course and there is no duty on Hart to accept any unmet housing requirement from any of its neighbours, again, as long as there was robust evidence that this would be inconsistent with the NPPF.
- Further factors that will need to be considered*
- 3.41 Having considered a range of factors with the potential to influence Hart's overall housing requirement, the conclusion, based on currently available evidence, is that the objectively assessed housing needs amounting to 7,534 homes between 2011 and 2032 (or an average of 359 per year, as

presented in Table 3.1) provide an appropriate starting point for preparing the new Hart Local Plan. However, as local plan preparation commences, a number of other factors will also need to be considered which may influence the final housing requirement for Hart, but for which there is insufficient evidence at this stage to draw conclusions. The factors are summarised as follows:

- 3.42 **Housing capacity** – Although the details provided under each of the spatial development option covered in Section 4 provide an indication, where possible, of the potential capacity for housing, further detailed work will be undertaken to ensure that, for whichever option (or options) are eventually selected, there is a realistic prospect of suitable and developable land being available with sufficient capacity to accommodate the required level of housing development. The Council is appraising the SHLAA sites in order to further develop its evidence base on potential housing capacity.
- 3.43 **Landscape capacity** – Although there are no areas within Hart that are designated for their landscape importance or quality, the studies on landscape character that have been undertaken (see Appendix A) highlight a wide variety of landscape types, some of which are of particular high quality, for example, the open downland landscape of the south of the District. The studies also highlight the sensitivity of some of Hart’s landscape to development and the need for caution when planning new development within these areas. Given the need to maintain the overall quality of Hart’s landscapes as a valuable resource that helps to sustain quality of life, the Council is undertaking some further work to assess the capacity of the landscape for further development. The outcomes of this should help clarify which general areas within Hart can sustain greater levels of housing development without causing significant reductions in landscape quality and which areas are more constrained in the level of development that can be accommodated.
- 3.44 **Biodiversity constraints** – Considerable areas within Hart are designated for their importance for nature conservation. Principal amongst these is the Thames Basin Heaths Special Protection Area (SPA), which covers 2,099 hectares, mainly in the north and east of the District. As a further constraint, all residential development is excluded within 400m of the SPA areas. The combination of the SPA and the 400m ‘exclusion zone’ represents a very significant constraint to housing development, especially around Yateley and Blackwater, but also affecting parts of Fleet and Hartley Wintney.
- 3.45 In addition to the SPA, Hart includes 16 Sites of Special Scientific Interest, 252 Sites of Importance for Nature Conservation, 3 Local Nature Reserves and one National Nature Reserve. In total, these areas cover in the region of 4,900 hectares, which is close to 20% of the entire area of the District. Whilst all development would generally be excluded from within these designations, further work would need to be undertaken on any potential development sites adjacent or in close proximity to these areas in order to assess the likelihood that development would harm the integrity or function of the designations. This could result in development being excluded from some areas outside of but close to these designated sites or the capacity for development in such areas being reduced.
- 3.46 **Flooding constraints** – The risk of flooding from fluvial sources affects significant parts of the District, which are indicated by Hart’s Strategic Flood Risk Assessment (and by more up-to-date fluvial flood maps)⁴² to be located within flood zones 2 and 3. The key areas affected include the far north east of Hart (the Yateley and Blackwater area), parts of Fleet and areas to the east and west of Fleet and areas between Hook and North Warnborough and Odiham. The extent to which flood risk represents a constraint to development will depend on the site proposed and this will need to be considered as part of work appraising potential developments sites. In addition to the risks from fluvial flooding, the risks of surface water and ground water flooding also need to be considered, as well as the potential to mitigate flood risks where development is being proposed.
- 3.47 **Heritage constraints** – Hart has a significant number of heritage designations covering a considerable area of the District. These include 8 Historic Parks and Gardens and 32 Conservation Areas. Some parts of the District include more heritage constraints than others, with Hartley Wintney, Odiham North Warnborough and some of the smaller villages being particularly constrained with heritage designations. Whilst the presence of most heritage constraints would not necessarily

⁴² Hart District Council is in the process of updating its Strategic Flood Risk Assessment to include the latest flood zone mapping available.

result on all new housing development being excluded, it does require greater caution and sensitivity when planning for new development and may result in a reduction in the overall housing capacity of those areas affected by the heritage designations.

3.48 Quality of life – One of Hart’s key strengths is the overall high quality of life it affords to those who live and work within the District. This is a valuable ‘asset’ and is likely to be one of the main reasons why the District is a popular location for people to live. The NPPF views the pursuit of sustainable development as including improvements to people’s quality of life. Therefore, it will be important to understand the potential impacts on quality of life that the level of required housing and other development might have. The positive impacts, such as a greater choice of housing and the potential for additional SANGs, will need to be encouraged. Equally, the negative impacts, such as increased congestion and pressure on services will either need to be mitigated or may ultimately necessitate a reduction in the overall level of development that it is possible to sustainably deliver across the District.

3.49 Infrastructure capacity - Related to quality of life is the capacity of Hart’s infrastructure to absorb the anticipated levels of population, employment and housing growth. Section 2 of this paper outlined a number of infrastructure capacity issues already faced within the District and the levels of new development being considered here could well exacerbate these problems. An objective for the new Local Plan therefore, will be to ensure that mechanisms are in place to be able to fund and secure sufficient infrastructure improvements, or new infrastructure, where required. These mechanisms need to offer a reasonable degree of confidence that serious capacity issues, that could in turn negatively impact quality of life, can be avoided. Where reasonable doubts remain over the ability to address anticipated infrastructure deficits, and this is supported by evidence, the pace of development may need to be slowed down, or the overall level reduced until the specific infrastructure issues can be resolved.

Estimating a residual housing requirement

3.50 Before the potential spatial housing delivery options are presented in the next section, some analysis of the current components of Hart’s housing supply is required. This will aid understanding of the level of housing that Hart still needs to plan for through new site allocations or other planning policies within the Local Plan; in other words, a residual housing requirement. In order to estimate this, the eight steps outlined below need to be applied.

It is stressed that the figures resulting from Table 3.5 below are no more than a working assumption, based on the SHMA work and an understanding of Hart’s anticipated 5-year supply of housing land. They do not reflect any agreement by Hart District Council, or its HMA partners, over the actual total housing requirement that will be taken forward in the new Hart Local Plan.

Step 1: The starting point is the SHMA-based ‘objectively assessed housing needs’ figure (see Table 3.1 above).

Step 2: Deduct housing completions for the three years 2011/12 to 2013/14.

Step 3: Deduct outstanding planning permissions, as at 14th May 2014.

Step 4: Deduct the assumed housing capacity for identified deliverable sites (either included within Hart’s SHLAA or subject to current planning applications) where housing could, in principle, be permitted under the existing ‘saved’ policies of the Hart District Local Plan (Replacement) 1996 – 2006.

Step 5: Deduct the assumed housing capacity of major sites that were proposed within the submitted Core Strategy (subsequently withdrawn) and have since been included within Hart’s Interim Housing Delivery Strategy 2013. Both of these sites (North East Hook and the Edenbrook extension in Fleet) are subject to current planning applications being considered by Hart District Council.

Step 6: The residual housing requirement, i.e. the remaining ‘objectively assessed housing need’ after deducting identified sites (Step 1 minus Steps 2-5).

Step 7: Estimation of the annual housing requirement for April 2014 to March 2019, based on the work undertaken to estimate Hart’s 5-year supply of housing land (14 May 2014).

Step 8: Estimation of the annual housing requirement for the period April 2019 to March 2032. This is based on annualising the housing requirement figure from Step 6. However, this is adjusted

to include the 200 homes at the North East Hook site that are not due to be completed until after March 2019.

Table 3.5: Estimating a SHMA-based residual housing requirement as a basis for the consideration of spatial development options (at 14th May 2014)

Step 1	SHMA-based 'objectively assessed housing needs' for Hart (see Table 3.1)	7,534
Step 2	Housing completions for the three years 2011/12 to 2013/14	-792
Step 3	Outstanding planning permissions (at 14 th May 2014)	-1,851
Step 4	Deliverable sites (at 14 th May 2014)	-130
Step 5	Major sites identified within submitted Core Strategy (withdrawn)	-743
Step 6	Objectively assessed housing need where sites remain to be identified (residual requirement)	4,018
Step 7	Estimated annual supply of homes (April 2014 to March 2019)	505 per annum
Step 8	Estimated housing requirement with sites yet to be identified (April 2019 to March 2032)	325 per annum

- 3.51 It should be noted that the annual figures provided in Steps 7 and 8 are at best broad estimations at this early stage of the Local Plan process, and subject to change. The figure for Step 7 is likely to be increased as windfall sites (i.e. sites as yet unidentified) come forward, achieve planning permission and are completed in the period to March 2019. As such sites come forward, they can be taken account of, and may result in the annual estimated requirement for 2019-3032 being reduced. Conversely, some of the sites with current planning permission, or sites subject to current planning applications, may not be delivered at the pace that the table above assumes, so potentially reducing the annual figure in Step 7 and increasing the figure in Step 8.

Employment Requirements

- 3.52 A key objective for the new Local Plan will be to identify and maintain a supply of suitable, flexible employment land, in the context of its wider functional economic area. The NPPF encourages local planning authorities to plan proactively to meet the development needs of business and to assess land or floorspace requirements for economic development. The Enterprise M3 LEP Strategic Economic Plan 2014 – 2020 sets out a vision for the wider economic area to be 'the premier location in the country for enterprise and economic growth, balanced with an excellent environment and quality of life'.
- 3.53 The Enterprise M3 LEP is one of the highest performing economies in the UK and Hart shares many of its key strengths. The district is centrally located within the Enterprise M3 Local Enterprise Partnership area, and has a high rate of employment, above average skills and wages, good transport accessibility to London and the South East and a high quality environment which is reflected in its relatively strong local economy.
- 3.54 The objective of the Strategic Economic Plan is to achieve its vision through a number of clearly thought out and targeted interventions that support several inter-linked elements of the local economy. These comprise of measures to promote: (1) enterprise development and competitiveness; (2) the generation and commercialisation of innovation; (3) the growth of high value industries; and, (4) the development of skills needed by employers. A key aspiration is to ensure that by 2020, 52,000 new jobs are created (one in five of which will be in in Research and Development and high value added industries) and that entrepreneurial activity is increased with an additional 1,400 businesses created per annum. Hart District forms part of the Enterprise 'M3 Sci: Tech Corridor', an economic asset of national importance, capable of leading the way in sectors such as aerospace and defence, digital media, 5G, cyber security and pharmaceuticals
- 3.55 Most of this economic growth is to be centred outside Hart in four 'Growth Towns (Basingstoke, Farnborough, Guildford and Woking) and in the seven 'Step-up Towns' (Aldershot, Andover, Camberley, Staines-upon-Thames and Whitehill and Bordon). It is anticipated therefore that Hart will

retain its current dormitory role, providing high quality places to live for some of those who will work in other employment centres beyond the District's boundaries. However, in order to ensure some level of balance, the employment strategy emphasis for Hart is likely to focus on encouraging a rebalancing away from offices (recognising its historic surplus) to premises for which there is a need, for example, start-up premises and premises where successful growing start-up companies could move on to. The rural economy will also continue to play a key role and the Enterprise M3's Strategic Economic Plan sets out a number of measures to enhance the competitiveness of rural business. Discussions are currently taking place with rural partners around the investment of £4.5m European Agricultural Fund for Rural Development (EAFRD) funding into the rural economy from 2014-2021.

- 3.56 The most recent assessment of likely economic growth in Hart, Rushmoor and Surrey Heath was carried out as part of the recent Strategic Housing Market Assessment. The 'central economic growth' scenario, was considered by the SHMA to be the most appropriate in terms of employment growth within the North East Hampshire / West Surrey HMA. This scenario predicts a likely 16% increase in jobs over the period 2011-31, amounting to 1,130 jobs per annum and 22,600 new jobs in total. This rate of growth is notably higher than the average achieved in the decade before the recession (650 jobs per annum were achieved in the period 1988-2008) and fits with the Enterprise M3 LEP's Strategic Economic Plan, but represents a significant uplift in job creation over and above historic trend levels.
- 3.57 By comparison an assessment of future economic growth across the three HMA authorities, undertaken by Nathaniel Lichfield and Partners in 2009, as part of an Employment Land Review (ELR)⁴³, estimated the growth of 17,730 jobs (including the self-employed) between 2008 and 2026 (985 per annum).
- 3.58 The 2009 study identified the need for approximately 252,000m² to 359,000m² of employment space over a 17 year period to provide for the economic growth projections at that time. This implied a need for broadly between 48 and 70 hectares of employment land across Hart, Rushmoor and Surrey Heath, although the need for significant new employment allocations in Hart district was not considered likely to be required.
- 3.59 Hart is considered to have more than enough office space to meet its future needs. The ELR reported that Hart experienced the largest gains in employment space within the sub-region in the years preceding the recession, an increase of over 30%, mainly in office space. There is now a significant oversupply of older space, unattractive to the market (vacant office forming 18% of the total stock in 2009). The ELR also reported that some vacant town centre office space was also present in Fleet.
- 3.60 A key issue for Hart is the extent to which there may be an opportunity to re-balance employment floorspace away from office space towards meeting the needs of smaller growing businesses. Whilst the ELR identified a small shortfall in industrial space to 2026, it noted that this could be addressed elsewhere in the study area, particularly Surrey Heath, which had a surplus as at 2009. The report also advised that some small, flexible industrial units could be encouraged on other existing employment sites within Hart, including the redevelopment of more office based locations.
- 3.61 In the light of new high-level economic growth forecasts as set out in the SHMA, the amount of employment land necessary to meet likely demand over the new Local Plan period will be revisited and the need for new employment site allocations considered. This assessment could include analysis of future market requirements and an appraisal of employment sites across the area to allow policy decisions to be made over protecting or releasing sites as appropriate to meet employment needs within the district to 2032.
- 3.62 Recent economic area analysis⁴⁴ has highlighted the need for co-ordinated decision-making, including a need for Hart to work with Rushmoor and Surrey Heath on a co-ordinated economic development strategy. This strategy may need to include the allocation of land for employment uses. Collaboration with other local authorities neighbouring Hart will also be needed under the duty to cooperate. For example, Hart may need to identify areas of common interest with Basingstoke and Deane Borough

⁴³ Employment Land Review for Surrey Heath, Hart and Rushmoor (Nathaniel Lichfield and Partners, 2009)

⁴⁴ Hart Functional Economic Area Analysis Draft Final Report (May 2014)

Council, given the evidence of growing economic linkages between the two Districts. Equally, Hart District Council will engage with Waverley, Guildford, Bracknell Forest and Wokingham Councils, given their responsibility for settlements within the Blackwater Valley area. Engagement with other authorities in the wider Travel to Work area or with strong commuting linkages to the Blackwater Valley is also likely to be needed. For example, this might include East Hampshire, Reading, Woking, Runnymede and West Berkshire Councils. Any evidence work on future employment development undertaken by Hart District Council will need to involve close collaboration with the Enterprise M3 LEP and also the Thames Valley Berkshire LEP.

- 3.63 As part of any further assessments undertaken, the potential for conversion of office floorspace to residential will need to be examined as a means of boosting the supply of housing on previously developed sites, within or adjacent to Hart's existing settlements. This approach would be in line with the Enterprise M3 Strategic Economic Plan, which seeks to accelerate the delivery of housing by up to 25% above the baseline (2003-13 delivery) across the LEP area. In part this is to enable the local workforce to live and work locally, recognising the role the housing plays in supporting growth across the area.
- 3.64 Given the current spatial constraints within the zone of influence of the Thames Basin Heaths Special Protection Area (THBSPA) the LEP promotes the conversion of redundant office space to residential uses in these locations as a means to boost the housing supply. Currently, around sixty per cent of the resident workforce already commutes out of Hart to work and given the locational economic growth strategy of the Strategic Economic Plan, the District is likely to continue to remain susceptible to high levels of out-commuting in the foreseeable future.

Retail Requirements

- 3.65 Hart District has four main retail centres as defined in the adopted Local Plan; Fleet, Blackwater, Yateley and Hook, together with a number of smaller centres serving individual settlements. The centres in Hart District serve predominantly local functions, providing for basic shopping as opposed to meeting higher level needs. As such, significant levels of expenditure and shopping trips are lost from the District to larger centres nearby, including Aldershot, Basingstoke, Camberley, Farnborough and Bracknell. Existing centres perform reasonably well in terms of vitality and viability, however, weaknesses are present, including in relation to accessibility and fragmentation of retail frontages. There is also a continuing perception of a limited range of shops within the District.
- 3.66 The Hart Retail Capacity Assessment (HRCA), published in 2006 and updated in 2012,⁴⁵ provides the most recent retail evidence base. The 2012 update report summarised future growth as including £327.3 million of comparison expenditure growth and £33.6 million of convenience expenditure growth from 2011 to 2026.
- 3.67 Assuming Hart's centres maintain their share of expenditure in relation to competing centres in surrounding areas, then a relatively low amount of comparison floorspace is needed up to 2026 (3,900sq m) which could be met through vacant units being reoccupied and infill extensions. The study did suggest there was scope to increase market share if new sites for comparison shopping floorspace could be found. However other work by Knight Frank, in respect of Fleet Town Centre, concluded that from a commercial point of view, Fleet was unlikely to attract a significant increase in comparison retail.
- 3.68 In terms of convenience goods floorspace (e.g. supermarkets); the study identified a need for 4,410m² net and 1,650m² net of food and drink uses. Some of this need will be met from the new supermarket permitted at the North East of Hook.
- 3.69 In addition to the existing requirements for retail development, additional floorspace requirements would need to be allowed for within the new Local Plan period as a result of planned housing growth. Ensuring that new housing development was planned in a sustainable way would include planning for

⁴⁵ Hart LDF Retail Capacity Assessment (Atkins and Adams Hendry Consulting Ltd, 2006) and Hart Retail Study Update (Roger Tym & Partners, March 2012)

new appropriately scaled retail floorspace, potentially including new local or district centres to cater for the needs of any larger, more significant developments. Further updates to the retail evidence studies will be undertaken to support the preparation of the new Local Plan.

Infrastructure and Community Facility Requirements

3.70 The former Hart Local Strategic Partnership was formed in 2000 and comprised Hart District Council and local service providers, plus business, voluntary and community organisations. The partnership drew upon community planning to agree strategic priorities that will ensure quality of life is maintained in the district, in relation to health, entertainment, leisure, social services, environment and education. The Sustainable Community Strategy for Hart (2008-2018) was therefore developed to support a fully-functioning, successful community, based on the following priorities:

- I. An environmentally conscious community and a sustainable District
- II. Affordable, safe, well-maintained, sustainable housing
- III. One of the safest Districts in the South East
- IV. A beacon of good health
- V. A diversified and balanced economy
- VI. A sustainable and accessible transport system

3.71 In order to meet the above priorities as well as those emerging from decisions in relation to housing development options, on-going engagement with relevant partners will be required to identify infrastructure, community facility and public service requirements as part of preparation of the new Local Plan. This will need to address the existing and likely future need and demand for new or enhanced facilities and services, including schools, healthcare services and leisure facilities. New development provides opportunities to deliver new and improved services and facilities capable of meeting this likely future demand and also any existing requirements.

Schools

3.72 As highlighted in Section 2, Hampshire County Council has identified school requirements for Hart District up to 2020. Demand for additional school places and/or expanded school infrastructure to accommodate forecasted growth in pupil numbers will arise from new housing developments over the new Local Plan period, including any associated in-migration. Natural population growth, demographic change, and any school closures are also a consideration. Hart has experienced significant growth in the numbers of children aged 0-14 over the last 10 years, suggesting the District is an attractive place for families to locate and this has contributed to increasing pressure on school places.

3.73 School requirements identified for Hart District up to 2020 have been planned in response to anticipated housing developments namely in the Fleet/Crookham and Hook/Odiham school planning areas. There is particular pressure for school places in Hook/Odiham with all schools being full or close to full, and a significant proportion of potential housing development occurring in the Fleet/Crookham area would require extra school capacity. Requirements up to 2020 notably include the expansion of a number of primary schools, many of which are already under pressure. 420 primary places are required to cover Fleet Town, and Hook Infant and Junior schools require an additional 420 primary places to cover the Hook area. 300 secondary school places are required to cover the Odiham area, which will see the expansion of Robert May's Secondary School.

3.74 The above are however short-term requirements, and school forecasting is carried out annually by Hampshire County Council (HCC), with longer term school requirements being identified once the location and scale of development is known.

3.75 It is Hampshire County Council's policy that new primary schools are provided within major new housing areas, where justified by the number of children likely to be living there when the development is complete. Where demand is not enough for a new school, it is expected that a new development will be served by its nearest schools. As such, the new Local Plan must be consistent with this approach in respect of developer contributions and/or school infrastructure provision in respect of new developments.

- 3.76 Hampshire County Council's Developers' Contributions document⁴⁶ suggests that, in simplified terms, a minimum of 700 houses would trigger a 1-form-entry new primary school (based on a factor of 0.30 children per dwelling, applied to all dwellings with two or more bedrooms). However, in reality developments of less than 700 could still trigger the need for pupil places depending on what surplus capacity is available in nearby schools. As a result of the above, and further owing to the complexities of providing a new secondary school, the new Local Plan will be developed with on-going engagement with Hampshire County Council's School Organisation and Children's Services Teams.

Health facilities

- 3.77 The health of people in Hart is good with life expectancy for both men and woman being higher than average⁴⁷. Estimated levels of physical activity are above the national average, and levels of adult smoking and obesity are also better than the national average. Levels of participation and take up of sport and active recreation within the District are very healthy. Whilst this paints a good picture for health in the District overall, priorities for Hart as identified by Public Health England include alcohol, children's health and wellbeing and healthy ageing. New development will also require additional public health services and facilities and the new Local Plan must address these existing and future needs. There are also inequalities in health between areas within Hart, with life expectancy in the most deprived areas being lower than for other parts of the District.
- 3.78 Demand modelling undertaken by the Council in 2012 indicated a need for additional fitness stations and these were provided at Hart Leisure Centre in 2013. Projected population increases will generate additional future demand, which the Council plans to meet within the replacement Hart Leisure Centre (see below).
- 3.79 The Council will engage with relevant partners including local NHS commissioning groups to identify opportunities to deliver new and improved health services to meet future demand. In their Annual Review 2013/14⁴⁸ Hampshire Hospitals NHS Trust also highlighted a commitment to developing more local health facilities within communities served by the Trust. Any proposals for health facilities within the new Hart Local Plan will also take account of engagement with the Hart Health and Wellbeing Board, made up of Officers, Councillors and Health Care Professionals and representatives of the Third Sector.

Leisure facilities

- 3.80 The Hart Leisure Strategy 2007-2017 is due to be reviewed and updated in the near future. However, this highlights the commitment that should continue in respect of Hart's priorities, specifically in terms of enabling the provision of a range of high quality and accessible facilities, services and opportunities which meet the leisure, sport, health and physical activity needs of the District's communities.
- 3.81 Hart's Open Space, Sport and Recreation Assessment (2012)⁴⁹ highlights that there is a reasonable supply of open space and recreation provision in the District, however there is a need for some further children's play areas and youth provision. Further tennis courts and allotments⁵⁰ were also identified as being needed. Pressure currently exists on Hart District's two public leisure centres; Hart Leisure Centre in Fleet and Frogmore Leisure Centre in Yateley. Additional pressure will also be realised as new homes are built both in Hart and immediate surrounding areas in Surrey Heath and Bracknell Forest.
- 3.82 In 2010 HDC commissioned a feasibility study⁵¹ of potential options for the development of a replacement Hart Leisure Centre in Fleet. The study confirmed that in order to deal with current and future demand, there is additional need for a number of facilities in the Hart District. Swimming pool demand is high, and Hart Leisure Centre specifically has reached its programmed pool capacity and

⁴⁶ [Developers' Contributions Towards Children's Services Facilities](#) (Hampshire County Council, December 2013)

⁴⁷ [Health Profile for Hart 2013](#) (Public Health England, 2013) (national average based on England)

⁴⁸ [Hampshire Hospitals NHS Trust Annual Review 2013/14](#) (HHNHST, 2014)

⁴⁹ Open Space, Sport and Recreation Assessment (Hart District Council, June 2012)

⁵⁰ The need for allotments highlighted by the 2012 assessment has since been met through additional provision at Edenbrook Country Park, through private provision at Pilcot secured by 'Hart Allotments' and through funding for additional provision at Hook. Hart's parish and town councils will meet any future allotment provision requirements.

⁵¹ [Feasibility Study – Replacement Leisure Centre](#) (Scott Wilson & Strategic Leisure, 2010)

experiences waiting lists for swimming lessons. In addition, Hart has the third lowest area of sports hall space per 1000 population compared to its neighbouring Hampshire and Surrey authorities. As such, the 2010 study also identified a need for sports halls of the correct size to meet requirements for sports such as badminton, volleyball, basketball and netball.

- 3.83 Recent Sport England figures identify the highest leisure participation in Hart District as keep fit and gym, with swimming and football also being key sports within the District. Latent demand is highest in swimming and keep fit and gym. Dance studio and squash courts are also considered necessary as part of a good quality health and fitness offering. The 2010 leisure centre replacement study suggested a core facility mix for a replacement Hart Leisure Centre, which would include two swimming pools, squash courts, multi-purpose dance/activity studios, crèche, 150 station fitness gym, an 11 a side football pitch and four five-a-side 3G artificial grass pitches.⁵²
- 3.84 The Council is working to deliver the replacement leisure centre just to the south of a proposed expansion to the Edenbrook housing development west of Fleet on Hitches Lane. The refurbishment of Frogmore Leisure Centre is also required.
- 3.85 Improving existing open space and recreational provision, rather than increasing the quantity of provision, is considered a key approach to enhancing open space, sport and recreation provision across the District. However, as the population increases, sites are likely to experience increased usage and will require quality improvements over time. Housing development during the new Local Plan period will present opportunities to enhance on-site provision of open space and recreation facilities, along with the protection and enhancement of green spaces within the District. Developer contributions will be vital in ensuring new and enhanced leisure facilities are provided to meet demands from new housing development. New studies on open space, sport and recreation needs currently being commissioned will provide an up to date and comprehensive look at needs in the context of the planned housing growth, and will inform a new local plan policy on open space, sport and recreation provision.

⁵² The 2010 leisure centre replacement study was updated in March 2014 with a recommendation to build three swimming pools rather than two. The updated study also recommended that no squash courts were required. Hart District Council will decide on whether to accept these recommendations in July 2014.

SECTION 4: POTENTIAL OPTIONS FOR FUTURE HOUSING DEVELOPMENT STRATEGIES

Introduction

4.1 This section sets out a range of growth options to address the 'residual' 4,000 homes needed in Hart in the period up to 2032 (presented in Table 3.5 within the previous section). Although it may be possible for one of the options detailed below to meet this need in full, it is much more likely that two or more of the options will need to be taken forward in combination in order to ensure not only that overall housing numbers can be achieved within the plan period, but that a steady supply of housing can be achieved throughout that period. In summary the options are:

- Option 1 – Settlement Focus
- Option 2 – Dispersal Strategy
- Option 3 – Focused Growth (Strategic Urban Extensions)
- Option 4 – Focused Growth (New Settlement)
- Option 5 – Focusing development away from the Thames Basin Heaths SPA Zone of Influence

Methodology

4.2 Each option below is described in terms of what it would involve. Where possible, examples have been provided of other places within England where similar strategies have been followed and incorporated into core strategies or local plans. The options are then appraised using straightforward criteria, with maps provided to indicate how the strategies could be applied within Hart, through the preparation of a new Hart Local Plan. Where indicated, further details on the options or additional mapping are provided within the appendices that accompany of this document.

4.3 The following criteria have been used to appraise each option:

- **How and where the option could be applied** – The mechanisms that could be used to deliver each option into adopted planning policy are considered. Each of these delivery mechanisms is further discussed within Section 5 below. In addition, consideration is made of where within Hart each option might be capable of delivering new housing.
- **Potential scale of housing delivery** – Using existing available evidence from Hart's latest Strategic Housing Land Availability Assessment (SHLAA), completed in November 2013⁵³, a potential housing delivery number or range has been estimated, where it is possible to do so. In addition an indication has been provided of likely 'lead-in' times in years that would be required for each of the options to begin delivering new homes.
- **Other local authorities using the approach** – Research is undertaken into the spatial strategies taken forward within local plans adopted elsewhere in England since the introduction of the NPPF. This helps to build understanding of where and how the options considered have been successfully applied.
- **Opportunities** – An assessment is made of the positive planning opportunities that could be created under each strategy option. This might include opportunities for other planned development, such as the provision of infrastructure or employment development. Alternatively, it could refer to wider opportunities, for example, for local communities to become more involved in the planning process.

⁵³ The Council's Strategic Housing Land Availability Assessment (SHLAA) is subject to frequent updating as new sites are identified and assessed and can be found on the [Evidence Base page](#) of Hart District Council's website. The review of Hart's SHLAA undertaken for this document included all sites that were identified to 2nd June 2014.

- **Other benefits** – this assesses other likely benefits of the strategy, including those beyond housing development, such as the potential to deliver improvements to Hart’s environment, quality of life and economy.
- **Constraints** – This assesses the known environmental, landscape, infrastructure or other constraints that would need to be taken into account if the strategy were to be followed. Where appropriate, mitigation measures are referred to that could potentially address the constraint or reduce its impact on the scale of housing delivery.
- **Risks** – The potential risks involved in following the strategy are identified with an indication provided, where possible, about the likelihood of the identified problem arising and its severity if it were to arise.
- **Potential to mitigate impacts on Special Protection Areas** – Each option is considered in terms of its potential to impact on the Thames Basin Heaths Special Protection Area (SPA) and the extent to which the option could achieve any necessary mitigation, principally through the provision of ‘Suitable Alternative Natural Greenspaces’ (SANGs).
- **Further work required** – Based on our knowledge about Hart’s current evidence base, comments are provided about the likely further evidence and engagement work that would need to be undertaken in order to take the strategy forward.

Estimating the housing delivery potential of the options

- 4.4 At this stage and ahead of detailed site appraisal work that will be undertaken to support preparation of the new Local Plan, it is very difficult to put an accurate number to the various housing delivery options considered below. In the absence of other evidence, Hart’s currently identified SHLAA sites (up to 2nd June 2014) have been subjected to a high-level (desktop) review to allow estimated housing delivery numbers to be derived.
- 4.5 The Council assesses Hart’s SHLAA sites according to the Government’s guidelines, including their potential housing capacity numbers. It should be noted however, that these numbers are sometimes simply estimates provided by landowners or Council planning officers. The assessments also detail site opportunities and constraints and, where relevant, refer to planning history. For the purposes of preparing this document only, this SHLAA site assessment information was reviewed to identify the sites that fitted the requirements of each of the housing delivery options set out below.
- 4.6 As part of this review, a filtering process was applied which removed sites that were considered to have little likelihood of becoming suitable for residential development, even in the context of revised planning policies. The main factors which, either alone or in combination, resulted in sites being filtered out during the review process included:
- Significant environmental constraints that would not be likely to overcome through mitigation, for example, where the site was within 400m of the TBHSPA, or where a large proportion of the site was designated as SSSI, SINC or other similar constraint;
 - Significant heritage designation constraints, for example, where the SHLAA assessment noted that the openness of the site was needed to protect important views within a Conservation Area;
 - Significant flood risk constraints, for example, where a large proportion of the site included Flood Zones 2 or 3;
 - Where developing a site would be likely to give rise to the coalescence of existing settlements (i.e. more than just reducing the size of a settlement gap)
 - Where sites were detached from existing settlements and isolated within the countryside and developing homes there would be likely to represent unsustainable development.
- 4.7 It is important to recognise that this review, and the filtering involved, was undertaken without the benefit of the detailed site appraisals that would generally be undertaken to select sites for inclusion within a local plan and also without the benefit of Sustainability Appraisal and Strategic Environmental Assessment that would need to be undertaken to inform such decisions. For this reason, the potential

housing delivery numbers quoted below must be treated with caution and as a 'best estimate' for this early stage in the planning process.

Sustainability Appraisal

- 4.8 European Union and UK law requires the preparation of local plans to be informed by a sustainability appraisal (including a strategic environmental assessment). This must identify and evaluate the likely significant effects on the environment of each of the reasonable alternatives that were considered during the preparation of the local plan. Therefore, the options for housing delivery set out below have been subjected to a high-level sustainability appraisal options assessment, which is appropriate for this stage of local plan preparation.
- 4.9 This paper should be read alongside the high-level sustainability appraisal options assessment and both documents should be considered when evaluating the various options and deciding which of these should be taken forward to the next stage of local plan preparation.

OPTION I – SETTLEMENT FOCUS

Nature of option:

This would involve concentrating new housing development within the existing boundaries of the main settlements and larger villages within Hart. Opportunities would be sought for planned regeneration and change within the settlements, including the potential re-allocation of some employment and other land for residential redevelopment, where the land was no longer required or appropriate for the original purpose.

Other local authorities using this approach:

Most adopted Core Strategies (or Local Plans) have included this approach as a part of their overall development strategy, though none (outside of major urban areas) have been able to rely on it exclusively.

The practice of reviewing employment sites and allocations with a view to redeveloping or reallocating sites which are surplus to employment requirements or which are unsuitable to modern business needs is well established. Within urban areas this can form a very significant source of additional housing sites. Within rural districts however, surplus or unsuitable employment sites tend to be smaller and generally make a proportionally lower contribution to overall housing delivery. This is not always the case, as can be seen with the proposal to redevelop a number of Bracknell's surplus employment sites, amounting to a capacity for 821 homes, as set out within Bracknell Forest's Site Allocations Local Plan (adopted July 2013).

How and where it could be applied:

This option focuses on the potential to deliver housing within the existing boundaries of Hart's main settlements and larger villages. According to the Council's 'settlement hierarchy' settlements within tiers 1-4 have the potential to provide sustainable locations for additional housing development of an appropriate scale.⁵⁴ Therefore, this option is intended to relate to these settlements and not to any smaller villages or hamlets within tier 5 of the hierarchy. Given that the focus of this option is on established settlement boundaries, it is not dependent on changes to current geographical boundaries of settlements.

A review of employment protection policies, as part of a new Hart Local Plan, would be needed to establish a clear framework for identifying which employment sites continued to require protection, with the remainder being made available or 're-allocated' for housing or mixed-use development.

Potential scale of housing delivery:

Potential sites considered under this option could be identified through two main sources:

1. The Council's Strategic Housing Land Availability Assessment (SHLAA), comprising mainly of sites that landowners, agents or developers have suggested to the Council as housing development opportunities; and

⁵⁴ [A Settlement Hierarchy for Hart District](#) (Hart District Council, January 2010)

2. The review of existing employment areas, referred to above, identifying sites that continue to require protection, with the remainder being identified as available for redevelopment or re-allocation as housing or mixed-use.

In the absence of the updated employment land review, it is not possible to estimate with any degree of accuracy the total potential capacity for additional housing achievable under this option. However, given the need for some understanding of the potential for housing delivery under this option, a high-level review of Hart's main employment sites has been undertaken as part of the preparation of this paper (see Appendix B). A review has also been undertaken of the sites identified within the November 2013 SHLAA, in addition to the further SHLAA sites that have been identified between November 2013 and the end of May 2014. Based on this review work, it is considered that this option has the potential to deliver approximately between 580 and 875 homes, mostly within Fleet, Church Crookham and Elvetham Heath. The lead-in times under this option would be minimal and new homes could start to be delivered within a year or two. The number referred to above comprises approximately:

- 360 – 550 homes on SHLAA sites currently used or protected for employment uses;
- 100 – 200 homes on current employment sites, not identified within the SHLAA, with the potential for redevelopment in part as residential (See Appendix B for more detail); and
- 120 - 125 homes on sites identified within the SHLAA and currently used or protected for other (non-employment) uses. As examples, one SHLAA site is currently protected for a Park and Ride at Elvetham Heath and another is currently a surface car park in Fleet.

Beyond the opportunities identified above, there are likely to be a number of additional sites that could increase the housing delivery potential of this option. Nevertheless, there will be clear limits to the level of housing that this option could achieve. The main reasons for this include:

- Hart's current settlement boundaries have been drawn tightly around towns and larger villages and this has been exacerbated by infilling during recent years;
- Conservation Area designations within Hart's settlements could have the effect of making development inappropriate on a number of open sites within settlements, which might otherwise have been considered as suitable opportunities for residential development.
- Although employment sites may be identified as surplus and potentially suitable for housing, it is by no means certain that these sites will be available or that housing will be deliverable within any given period of time, for example, where the costs of land acquisition, site redevelopment or remediation undermine financial viability.

Opportunities:

- Helps to facilitate the regeneration of existing urban areas, for example, through the identification of town centre 'opportunity areas';
- Ensures that vacant or underutilised sites are prioritised within the planning process; and
- Provides a basis for the wider task of re-balancing Hart's employment floorspace provision by releasing sites that are surplus, no longer in demand for employment uses or are otherwise not suited to achieving Hart's economic development objectives.

Other benefits:

- Ensures that the most sustainable existing settlements within Hart make the largest possible contribution towards meeting overall housing requirements;
- Reduces the level of new housing provision required beyond existing settlement boundaries;
- Use of previously developed sites can help to improve the environmental quality of Hart's settlements;
- Prioritises what are currently the most accessible locations for new homes, close to existing employment, services, public transport and other infrastructure;
- Additional housing within settlements supports the local economy and contributes to the vitality and viability of town and local centres; and
- Developments within existing settlements are generally easier to integrate into the community.

Constraints:

- The level of new housing this option could achieve is limited and will fall well short of overall housing requirements, meaning that this option would need to be combined with one or more of the others;
- There are currently few opportunities to develop within existing settlement boundaries beyond the Fleet urban area, although a more detailed review of employment sites may increase the number of opportunities;
- Schemes involving an intensification of existing residential development may result in only a small net increase of homes once demolitions are taken into account and;
- Sites within existing settlements are unlikely to be able to provide any on-site SANGs and will rely on the capacity of existing or new strategic SANGs provision.

Risks:

- May require other uses, such as employment, to be displaced which could result in a loss of jobs from urban areas and the need to find additional sites for such uses, possibly beyond settlement boundaries;
- Releasing sites previously safeguarded for specific uses risks losing the original intended use;
- Intensification of residential development may result in undesirable changes to the character of an area
- Places further pressure on existing infrastructure and services within settlements, although also provides an opportunity to improve these; and
- Development of sites in existing use may be financially less viable as a developer has to purchase homes or businesses before development can begin, which may reduce the potential to contribute towards delivering affordable housing.

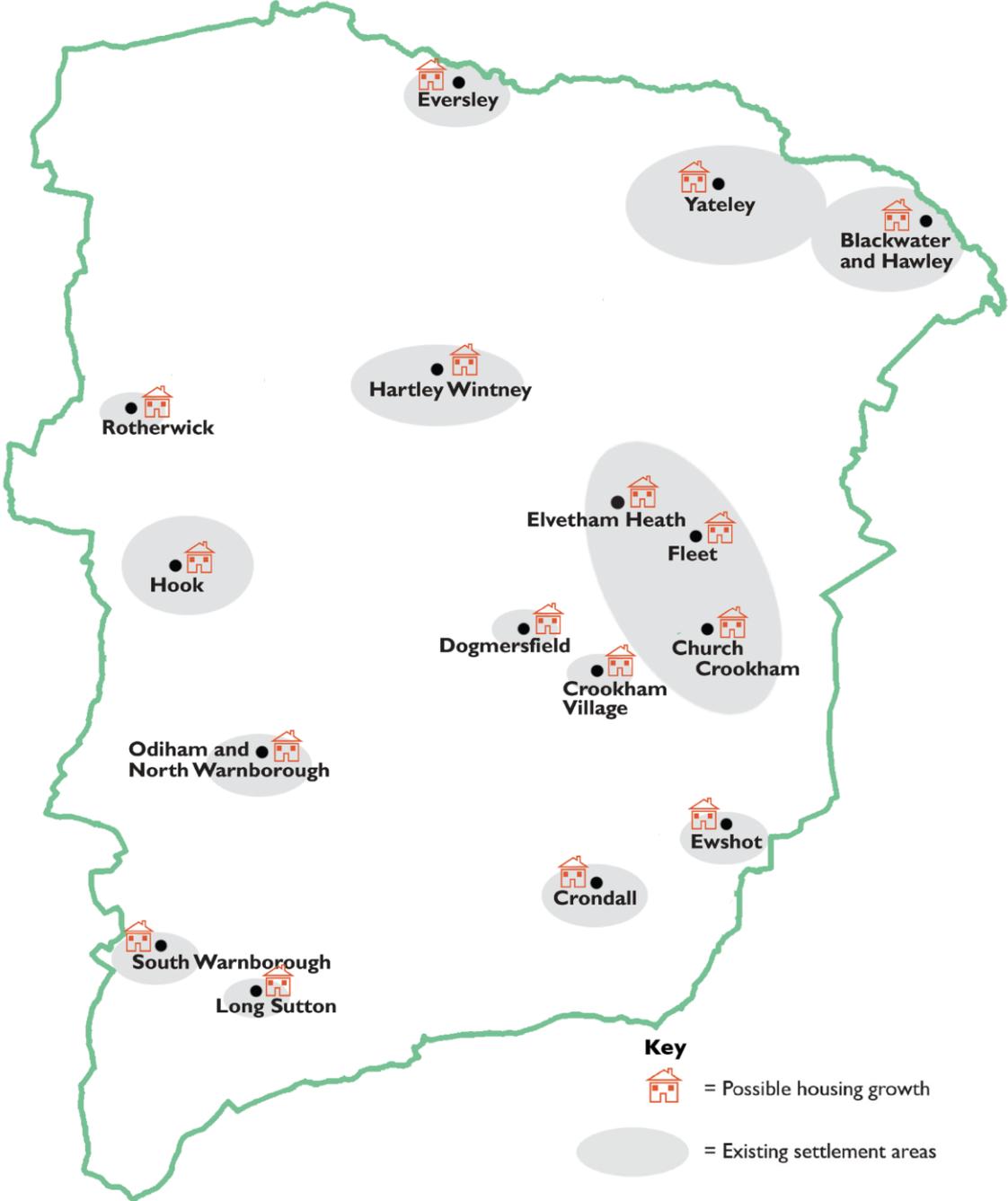
Potential to mitigate impacts on Special Protection Area:

Due to constrained size, housing sites within existing settlements are not likely to be able to provide on-site SANGs. Therefore, if this option is taken forward, consideration would be required about potential locations for new strategic SANGs close to the housing sites being delivered and preferably located between the housing sites and the nearest part of the SPA.

Further work:

Implementation of this option could be started under existing planning policies. However, its ultimate success will depend of further work leading to appropriately worded policies within a new Hart Local Plan, including a review of Hart's employment floorspace requirements and potentially an up-to-date Employment Land Review to provide clarity on which sites need to be protected and which could be released or allocated for housing.

Option I



* Please note that these maps are an illustration only.

OPTION 2 – DISPERSAL STRATEGY

Nature of option:

This option would involve allocating new housing development adjacent to each settlement within tiers 1-4 of Hart's settlement hierarchy⁵⁵. A starting point could be to try and enable growth in proportion to each settlement's overall size, and could take into account factors such as the existing dwelling stock within those communities, their level of infrastructure capacity and their accessibility by different modes of transport. There would also need to be an element of pragmatism led by site suitability and availability to identify the most appropriate sites. This might involve one or more allocated settlement extensions of an appropriate scale, in addition to a review of the built-up area boundaries. An important point about this option is that each part of the District would need to accept at least some new housing development.

Although this option relates only to settlements within tiers 1-4 of the settlement hierarchy, it would not preclude the identification of appropriate small-scale housing development within some tier 5 settlements, where this was related to meeting local housing needs.

Other local authorities using this approach:

Recently adopted local plans have generally included elements of this approach, for example, identifying the need for settlement extensions of varying sizes, based on local housing need/demand, and drawing on sites identified through the SHLAA process, and existing commitments, to demonstrate that sites are developable. West Berkshire's Core Strategy, adopted in 2012, is a good example of this approach, which, in combination with a settlement focus, has formed the principal part of the development strategy. Reigate and Bansted's Core Strategy takes a similar approach and is due to be adopted in July 2014.

How and where it could be applied:

Unlike Option 1, this approach would require appropriate planning policies to be included within a new Hart Local Plan from the outset. In addition, site-specific policies would be required, either to allocate sites for housing development adjacent to each settlement or to effect sufficient settlement boundary changes to enable housing development of the appropriate scale to come forward.

If any allocations proposed under this option are large or are strategic in nature, the Council would need to allocate these within the main local plan strategy document. However, for most housing sites envisaged under this option, allocations could be taken forward by a site allocations local plan document or by individual neighbourhood plans to be prepared by Hart's Parish and Town Councils.

Potential scale of housing delivery:

A review of Hart's current SHLAA sites indicates that there are identified sites adjacent to all main settlements and larger villages across the District with the potential to provide suitable locations for housing development. If all such sites were totalled, and ignoring larger strategic sites considered by Option 3 below, the potential housing delivery would be very significant and potentially in the region of 3,300 to 4,000 homes. As a starting point, and in the absence of information on relevant infrastructure capacity at each settlement, it could be assumed that a dispersal strategy might aim to deliver a 10% growth in the existing dwelling stock of each settlement, which would amount to an increase in dwellings of approximately 3,550. In practice the proportion achieved would be closely related to the ability to identify the most suitable, available and achievable sites. Lead-in times under Option 2 would vary, depending on the nature and size of sites involved. However, it would be reasonable to assume that new homes could start being delivered within 2 to 4 years.

The potential housing capacity of the identified SHLAA sites varies significantly and does not allow for an even-handed 10% increase across all settlements. For example, the main urban settlements (Fleet/Church Crookham and Yateley/Blackwater) have insufficient identified adjacent sites to allow for a 10% increase in dwelling stock, although a 5% increase could be achieved if all identified sites proved to be developable and were taken forward. Conversely, the rural settlements across the District (settlements within hierarchy tiers 3 and 4), as

⁵⁵ [A Settlement Hierarchy for Hart District](#) (Hart District Council, January 2010)

well as Hook have more than sufficient identified adjacent sites to deliver a 10% growth in dwellings.

Opportunities:

- This option has the potential to deliver a significant level of housing growth overall, although is likely to require combining with another option in order to meet Hart's residual housing requirement;
- Ensures that all main settlements and larger villages gain some housing to help meet local needs in those communities;
- All town, village and local service centres across Hart benefit from additional housing to support employment, retail and other services and to allow for local economic growth; and
- Infrastructure improvements secured through new housing development are distributed across the District and benefit a wide range of Hart's communities.

Other benefits:

- The approach to housing delivery tries to be as even-handed across Hart as possible, subject to site availability, and can ensure that no settlement experiences a disproportionate level of housing growth;
- Delivering housing through a larger number of generally small developments ensures that new housing areas can be well related to the existing built form of settlements; and
- Dispersing housing growth widely, as opposed to concentrating it in a few areas, provides the opportunity to maintain the overall character of the district and of individual settlements.

Constraints:

- There are insufficient currently identified sites adjacent to Hart's main urban settlements to allow them to make a proportionate contribution under this option; and
- There may be good planning, environmental or landscape reasons why some settlements cannot make a proportionate contribution to housing delivery.

Risks:

- By widely dispersing development, this option risks making it difficult to secure necessary infrastructure improvements to support the overall level of growth, particularly for the smaller settlements and villages;
- If sufficient sites adjacent to Hart's main urban areas cannot be found, the rural parts of the District may need to accept more than their proportionate share in order to meet overall housing requirements;
- This option spreads any potential impacts caused by new development widely across Hart, but unless new development is carefully phased and managed, it could result in significant impacts to transport networks in particular.

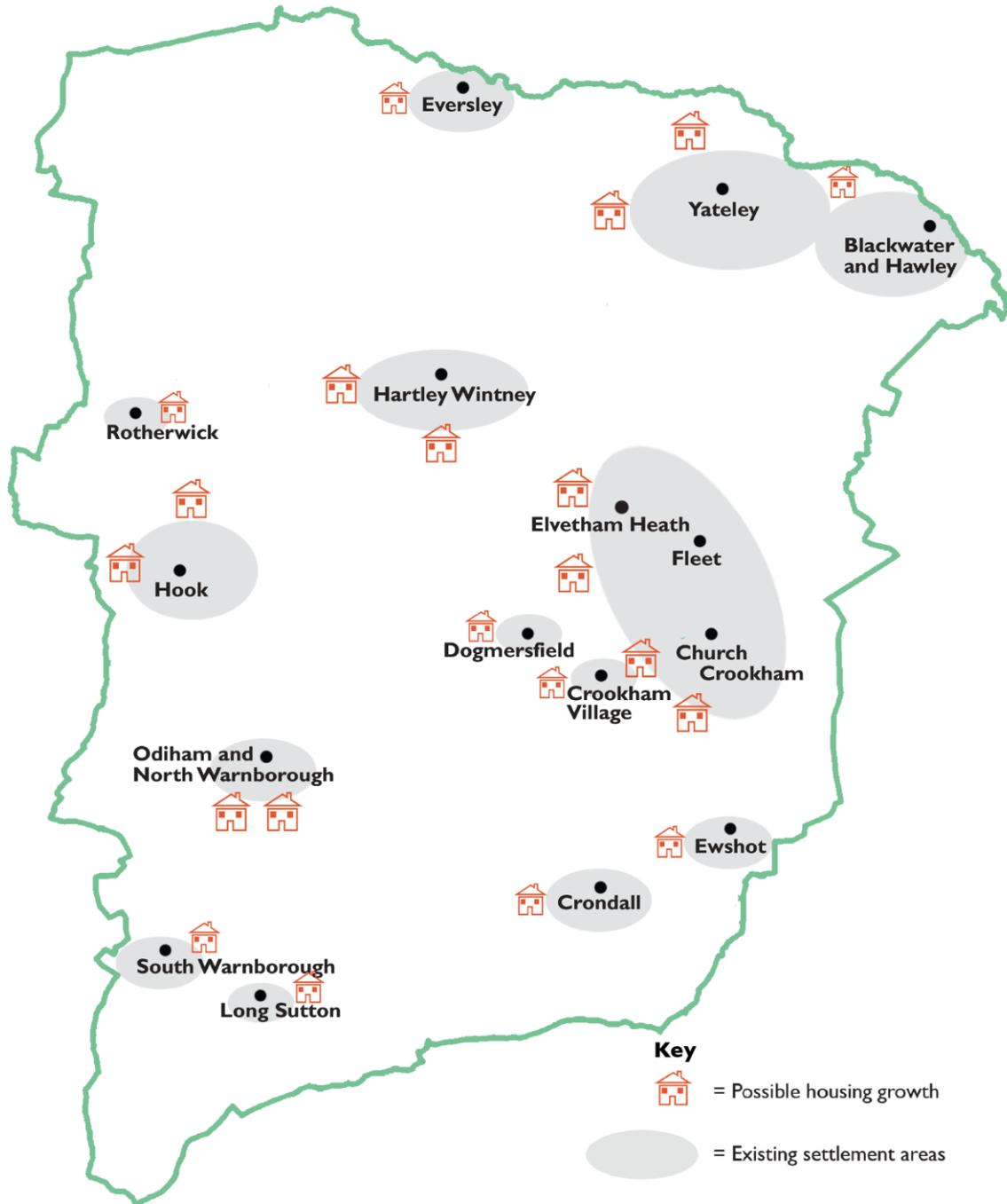
Potential to mitigate impacts on Special Protection Area:

The ability to create sufficient additional SANGs capacity under this option is not certain. Many of the sites that would be considered within this option are too small to provide anything more than a token amount of open space that would not be able to meet Natural England's SANGs standards. Inevitably, housing growth in some parts of the District under a dispersal strategy would need to rely on the creation of strategic SANGs elsewhere in the District, preferably close to the housing sites and located between the housing and the nearest part of the SPA.

Further work required:

There could be significant site-specific evidence work required to achieve a successful outcome under this option due to the widely dispersed nature of the planned growth and the number of potential development sites involved. However, much of the site-specific evidence work could be postponed until work commenced on a site allocations document, or could be undertaken by Parish and Town Councils as part of the preparation of neighbourhood plans.

Option 2



* Please note that these maps are an illustration only.

OPTION 3 – FOCUSED GROWTH (STRATEGIC URBAN EXTENSIONS)

Nature of option:

This option would involve a small number (perhaps one to four) locations being targeted for concentrated growth and development in the form of a major expansion of one or more existing settlements within Hart. These major expansions are sometimes referred to a 'sustainable urban extensions' to reflect the benefits in terms of locating new growth close to existing concentrations of jobs and services and with access to a range of transport mode choices.

Other local authorities using this approach:

Several strategic urban extensions (SUEs) have been developed within Hart over the past decade, including Elvetham Heath (about 1,900 homes) and Queen Elizabeth Barracks, which is currently under construction (about 1,200 homes). Beyond Hart's borders, a range of local authorities have taken this approach to meet housing requirements, either in addition to some modest dispersed growth, or as a way to minimise or remove the need for incremental settlement extensions and infill developments beyond settlement boundaries.

To the north of Hart, Wokingham Borough Council adopted a Core Strategy in 2010 including four 'Strategic Development Locations'. Of these two were strategic extensions north and south of Wokingham and two (land south of the M4 and Arbourfield Garrison) effectively proposed the creation of new settlements.

More recently, Winchester City Council is an example of an authority that has taken a mixed approach in order to address a high housing requirement. The City Council's Local Plan (adopted April 2013) included three key strategic allocations delivering the majority of housing needed, amounting to some 8,500 homes. This allowed the council to significantly reduce the level of housing development required through the identification of smaller SHLAA sites, both around Winchester itself and within the rural areas of that district.

How and where it could be applied:

The key to this option is identifying the right location(s) that is/are sufficiently unconstrained and with the capacity to deliver the level of housing required, as well as the infrastructure necessary to support the new housing, including new SANGs, where relevant. Importantly, for any major urban extension site to be sustainable it must allow for the planning of a new neighbourhood that, over time, can be effectively integrated into the larger settlement of which it will form a part. This aspect distinguishes this option from Option 4 below, which explores the creation of a new settlement in its own right.

In the recent past a number of locations have been explored for SUEs in Hart. This work could help to identify one or more locations which, given their scale, would only be appropriate adjacent to the largest settlements, comprising those within tiers 1 and 2 of the Hart settlement hierarchy, namely Fleet/Church Crookham, Yateley, Blackwater and Hook. The November 2013 SHLAA identifies a number of potential sites that could be explored further. However, if this option is taken forward, the Council would need to look more widely around the edges of Hart's largest settlements to ensure that other potentially unconstrained and sustainably located sites are not overlooked.

Potential scale of housing delivery:

The scale of housing that could be delivered through SUEs is flexible and very much dependent on the nature and capacity of the locations selected and the number of locations taken forward. As a minimum, a strategic extension could involve a few hundred homes or, where opportunities allowed, a larger new neighbourhood of well over 1,000 homes could be planned. A review of the current SHLAA sites indicates that this option could deliver as much as 3,500 homes in total, split across a number of sites (see map below). However, SUE's are likely to require lengthy lead-in times, potentially as much as 6 to 8 years before new homes start being delivered. This means that one or more of the other options would be required to ensure that housing delivery throughout the plan period remains relatively evenly balanced.

When planning the scale of any new SUE, it is useful to consider relevant infrastructure triggers for securing new on-site facilities. This is particularly important where existing infrastructure is at or close to capacity, as is the case in much of Hart. For example, Hampshire County Council uses guidelines when assessing the need for new primary school places that would equate to one form of entry being required for every 700 new homes. Therefore, to have realistic prospect of securing a new on-site 2-form entry primary school, for example, 1,400 homes should be considered as a minimum scale of delivery.

Opportunities:

- The overall potential for housing delivery under this option is significant, although combination with another option is likely to be needed in order to meet Hart's residual housing requirement;
- Large-scale planned developments provide greater opportunities to secure external funding for the planning and delivery of schemes from a range of sources, for example, 'Local Growth Fund' from the Enterprise M3 Local Enterprise Partnership or other funding from Central Government, such as 'Build to Rent' or from the European Union through the new 'Unified EU Structural Fund for England';
- The economies of scale involved in delivering SUEs help to ensure sufficient infrastructure can be secured and delivered alongside housing;
- SUEs can provide opportunities to include employment areas and local shopping centres, improving the sustainability of the development and potentially meeting existing needs;
- SUEs can ensure that developments are properly planned as cohesive new neighbourhoods rather than simply 'bolt-on' housing estates; and
- Larger developments at the edge of urban more areas potentially provide the best opportunities to secure new strategic SANGs.

Other benefits:

- Focusing growth in a small number of locations adjacent to more urban areas helps to ensure that the character of the other settlements and villages in Hart can be protected; and
- A development strategy based on SUEs can help to ensure that only the most accessible locations are developed

Constraints:

- SUEs depend on the availability of suitable unconstrained land adjacent to existing urban areas. Where such land is in short supply, for example, adjacent to Yateley and Blackwater, the scale of any proposed extensions will be very limited;
- Large-scale complex developments take considerable time to plan and allocations will require a significant body of evidence. This may result in delays to the preparation of the Local Plan;
- Large strategic sites may require time-consuming land assembly work involving multiple small landowners;
- Delivery of SUEs may need to extend many years into the future, possibly beyond the period of the Local Plan. This makes it inappropriate to rely exclusively on strategic scale developments as this approach is very likely to deliver insufficient housing in the early part of the plan period; and
- Relying on a small number of large strategic sites can result in an inflexible spatial strategy as the District's housing supply is vulnerable to unexpected delays on any given site;

Risks:

- SUEs have the potential to place a significant strain on the infrastructure of the host settlement, although this can be avoided or mitigated if proper infrastructure planning is undertaken at an early stage;
- Large urban extensions may result in potentially unwelcome changes to the character of the host settlement;
- Although focused growth (as opposed to dispersal) tends to affect fewer existing residents overall, those impacts can be much more severe and long-lasting for people living near to strategic developments;
- Planning for SUEs makes close working with landowners particularly important, but the deliverability of a major site can be put in doubt where one of the landowners refuses or ceases to cooperate;
- The level of resources required to plan for large strategic sites and the need for 'front-loading' by including allocations within the local plan strategy document, may place a strain on the Council's planning service

budget, although this may be possible to off-set by funding from the Homes and Communities Agency or DCLG; and

- Proposing a large long-term strategic development may encourage one or more neighbouring local authorities to seek help in meeting their own housing requirements under the 'duty to cooperate'.

Potential to mitigate impacts on Special Protection Area:

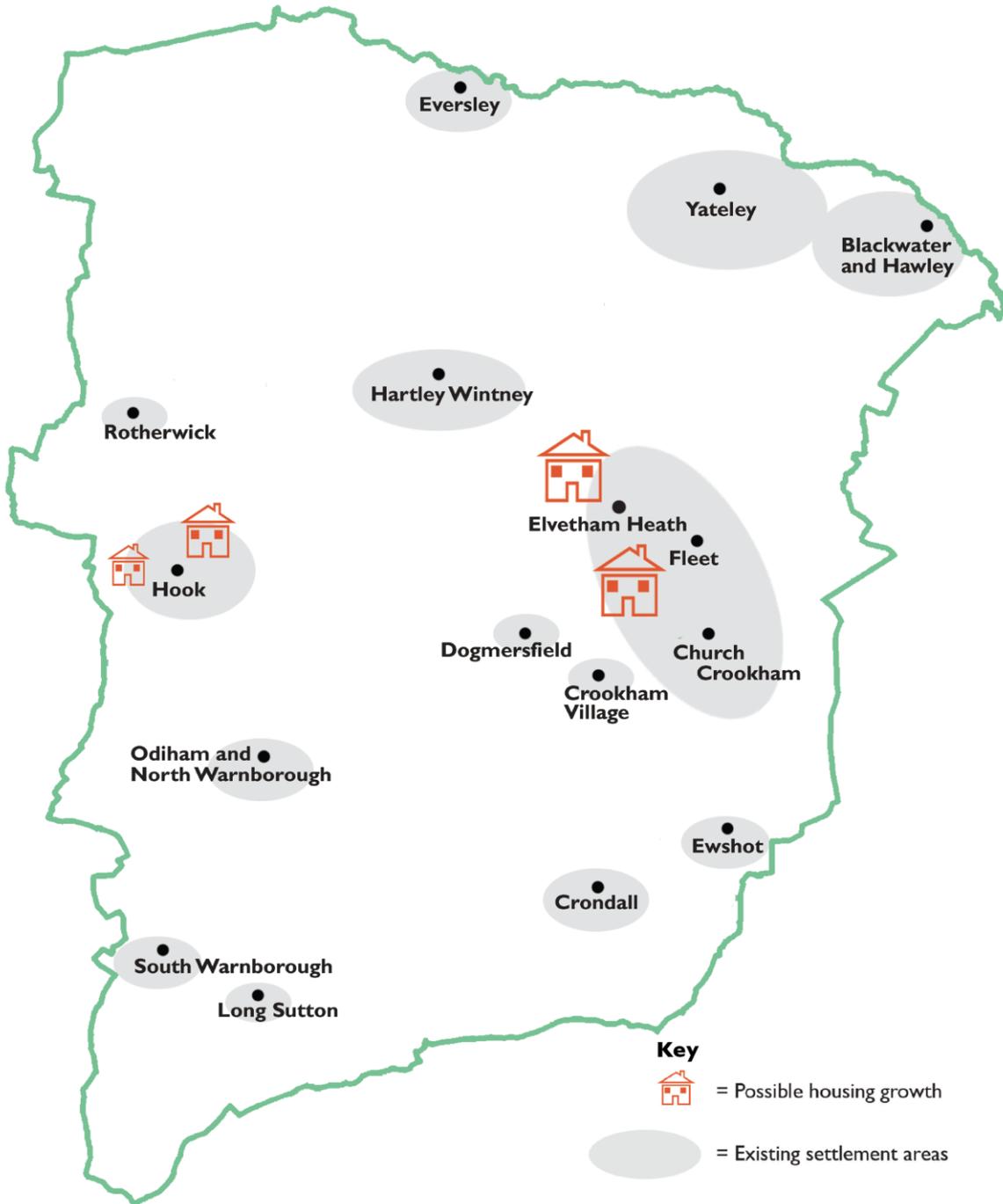
There is a high potential to secure sufficient land for new SANGs under this option as the scale of development makes it more economic to deliver significant areas of green infrastructure. Landowners will often be willing to make additional land available for SANGS where this unlocks significant levels of housing development.

Edge of settlement locations are also likely be appropriate for establishing new SANGs as these can generate visits from existing residential areas and so potentially reduce the number of trips to the SPAs. This is especially effective where the new SANGs are sufficiently large and attractive to use and are located between the existing settlements and the SPA.

Further work required:

Considerable work is required to be able to allocate SUEs within the local plan strategy document. The nature of the work will depend on the number of sites and their overall size. However, if close cooperation with site landowners/developers can be achieved, it is possible that at least some of the work required can be undertaken either jointly or by the landowners/developers and shared with the Council.

Option 3



* Please note that these maps are an illustration only.

OPTION 4 – FOCUSED GROWTH (NEW SETTLEMENT)

Nature of option:

This option is also about planning for focused growth within Hart, but in this case involves planning for a completely new settlement, distinct and separate from the existing main towns and villages. It is likely that, if taken forward, this option would involve only one new settlement. However, an important factor in this approach is the ability to plan for a new community that is large enough to facilitate at least a level of self-containment through including jobs, infrastructure, shops and services. Given the current focus in Government on 'garden cities', for example, as reflected within the National Planning Policy Framework (NPPF), there is the potential for any new settlement to be planned as a new 'garden community' for Hart.

Other authorities in England that have followed this approach:

A number of new settlements are at different stages within the planning process across the south of England. Some of these, such as Northstowe (South Cambridgeshire) and more locally, Whitehill and Bordon (East Hampshire) and Welborne (Fareham) originated as 'Ecotowns' under the previous Government. This meant that they were seen as 'sub-regional' strategic developments within the relevant Regional Strategies and were being planned in-addition to the normal housing requirements for the host authorities. Since the abolition of the Regional Strategies however, local authorities have been able to reconsider the role and character of their new settlements. This has resulted in some, for example Welborne, being re-branded as 'garden communities'.

How and where it could be applied:

Notwithstanding the significant environmental constraints within Hart's countryside, there remain some opportunities for the delivery of a new settlement that could accommodate much or potentially all of Hart's housing requirements. For example, work undertaken for the Pre-Submission Core Strategy in 2012 (since withdrawn) looked at the possibility of a new settlement at Winchfield in the centre of Hart. A new settlement would need to be distinct and separate from surrounding towns and villages, but would need to be well linked to surrounding areas to ensure it formed an integral part of Hart's network of settlements.

New settlements should be large enough to ensure that a sustainable location can be created, including the necessary infrastructure as well as jobs and services. Without sufficient scale, the danger is that a new settlement becomes a detached housing estate, completely dependent on car journeys for all residents' needs. Such places will be unlikely to become successful or sustainable new communities.

One of the greatest concerns is transport and the need to ensure that the dramatic increase in population and journeys accompanying a new settlement can be sufficiently accommodated through improvements to the local transport network, including providing a choice of travel modes to reduce car dependency. This suggests that locations selected should be as close as possible to both the strategic highway network and to the railway network, minimising the distance between the new settlement and the access points to these networks.

Potential scale of housing delivery:

Allocating a single new settlement of a size sufficient to create a sustainable new community would have the potential to meet most or possibly Hart's entire residual housing requirement to 2032. It may also help meet long-term requirements beyond this date and into the next plan period. Given the high-level assessment of sites included within Hart's November 2013 SHLAA, it is considered possible to identify sites that could accommodate at least 3,500 – 4,500 homes and associated employment, services and green infrastructure. How much of this level of development could be delivered by 2032 is difficult to determine without further evidence, but it is quite reasonable to assume that such a site could achieve a delivery rate of 250-300 homes per year, once the site reaches its maximum development levels, assuming necessary infrastructure could be phased appropriately to facilitate this level of delivery. However, a new settlement is likely to require a lengthy lead-in time, potentially as much as 10 or more years before new homes start being delivered. This means that one or more of the other options would also be required to ensure that housing delivery throughout the plan period remains relatively evenly balanced.

Opportunities:

- The overall potential for housing delivery under this option is very significant, although how much could be delivered before 2032 is less certain;
- As with Option 3, new planned settlements provide good opportunities to secure external funding to support the planning and delivery of schemes;
- The economies of scale involved in delivering new settlements help to ensure that sufficient infrastructure can be secured and delivered alongside housing and employment;
- As with SUEs, new settlements provide opportunities to include sufficient employment and services, improving the sustainability of the development and potentially meeting existing local needs;
- A new settlement can be located to take advantage of access to strategic road and rail networks and so reduce the overall impact of additional car traffic, compared to an equivalent level of development located away from these networks;
- Planning a whole new settlement provides considerable opportunity for the Council and local communities to influence the character, form and design of the new settlement; and
- New settlements can be planned to include sufficient land to deliver new SANGs.

Other benefits:

- Under this option, the impact of new development on the character of existing settlements could be reduced, particularly if little housing growth is needed beyond the new settlement;
- Any new planned settlement of at least 4,000 homes has the potential to provide a new secondary school on site⁵⁶, which could improve the sustainability of the development; and
- Disruption during the construction process is limited to one or a small number of locations and generally away from existing settlements.

Constraints:

- As with Option 3, Large-scale complex developments take considerable time to plan and allocations will require a significant body of evidence. This may result in delays to the preparation of the local plan;
- Large strategic sites may require time-consuming land assembly work involving multiple small landowners;
- Delivery of a new settlement would extend many years into the future, possibly beyond the period of the local plan. This makes it not possible to rely exclusively on this option as it would deliver insufficient housing in the early part of the plan period; and
- Relying principally on one large strategic site could result in an inflexible spatial strategy as the District's housing supply would be vulnerable to unexpected delays on that site.

Risks:

- Taking forward a proposal for a significant new settlement is likely to prove controversial and considerable time and effort would need to be committed to public engagement;
- Although focused growth (as opposed to dispersal) tends to affect fewer existing residents overall, those impacts can be much more severe and long-lasting for people living near to strategic developments;
- Planning for large strategic developments makes close working with landowners particularly important and the deliverability of a major site can be put in doubt where one of the landowners refuses or ceases to cooperate;
- The level of resources required to plan for large strategic sites and the need for 'front-loading' by including allocations within the initial Local Plan, can be significant and will need to be provided for in the Council's planning service budget, although this may be possible to off-set by funding from the Homes and Communities Agency or DCLG; and
- Proposing a large long-term strategic development may encourage one or more neighbouring local authorities to seek help in meeting their own housing requirements under the 'duty to cooperate'.

⁵⁶ Hampshire County Council uses a factor of 0.21 secondary pupils per eligible dwelling (i.e. of 2+ bedrooms) to calculate the estimated number of secondary age pupils that a new development may generate (see [Developers' Contributions Towards Children's Services Facilities](#), Hampshire County Council, December 2013). In addition the average size of maintained secondary schools in the UK is 900 pupils.

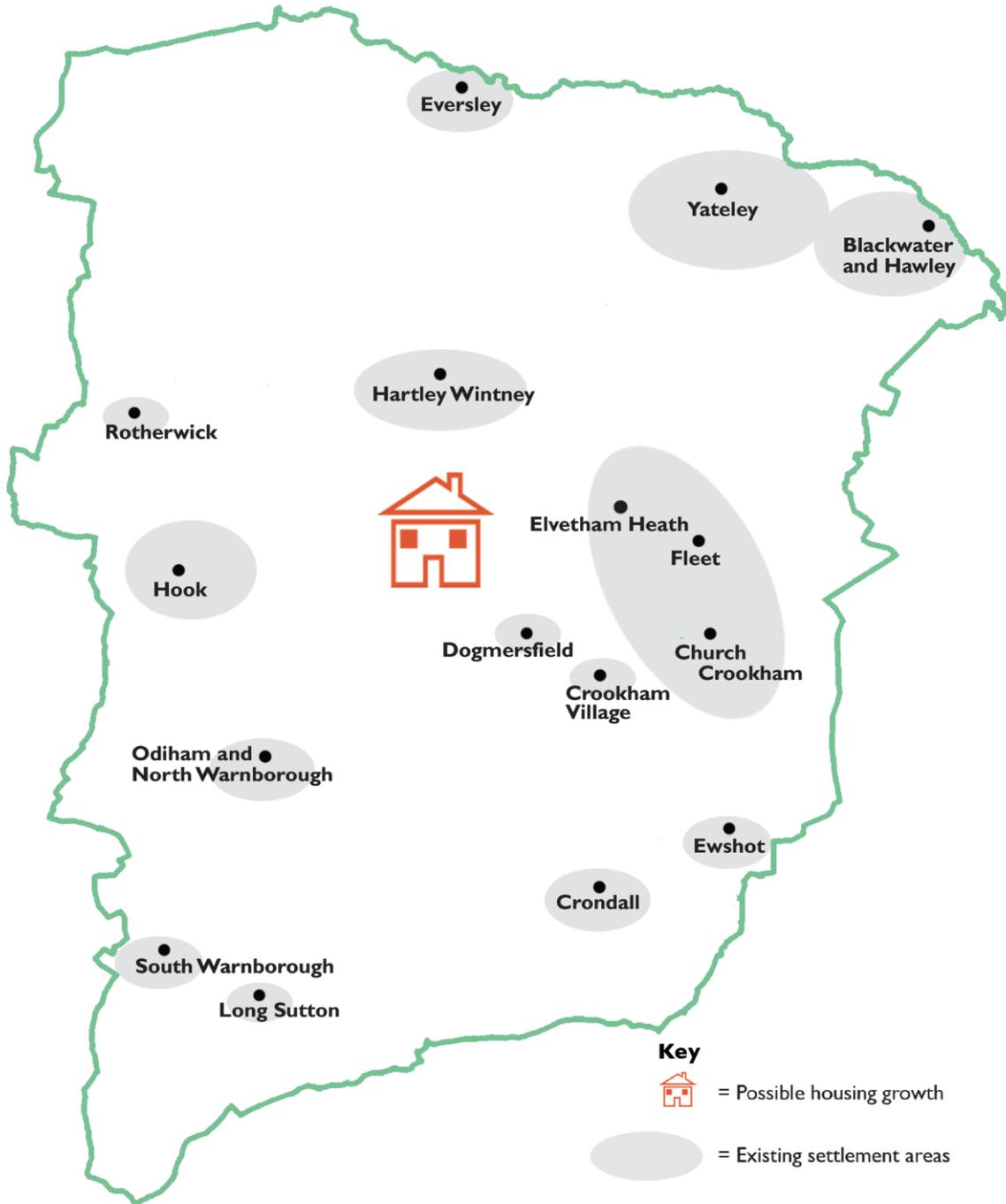
Potential to mitigate impacts on the Special Protection Area:

Planning new a settlement provides good opportunities to secure sufficient land for new SANGs for similar reasons to those detailed under Option 3 above. Ideally, new SANGs secured adjacent to a planned settlement should aim to perform a strategic role by building in capacity to attract visits from other new and existing residential areas which do not benefit from their own SANGs provision.

Further work required:

As with Option 3, considerable work is required to be able to allocate a site for anew settlement. This will depend on the overall size of the site and settlement. Again, cooperation with site landowners/developers can result in some of the technical evidence work being undertaken either jointly or by the landowners/developers and shared with the Council.

Option 4



* Please note that these maps are an illustration only.

OPTION 5 – FOCUSING DEVELOPMENT AWAY FROM THE THAMES BASIN HEATHS SPA ZONE OF INFLUENCE

Nature of option:

The Thames Basin Heaths SPA was classified under the EU Birds Directive in 2005 and includes areas of heathland across Surrey, Hampshire and Berkshire, covering 11 different local authorities. The SPA has been identified as an internationally important breeding habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. Natural England has indicated that the new population arising from housing developments at a straight-line distance of up to 5km from this SPA is likely to cause significant disturbance to the breeding success of these rare bird populations. This impact is caused by residents' recreational activities, particularly walking and walking with dogs. As a result, all housing developments within 5km of the SPA are required to mitigate their impact on the SPA, including through the provision of SANGs, intended to attract visitors away from the SPA.

The original policy within the South East Plan that established the planning framework for additional housing development near to the Thames Basin Heaths SPA is still in force and was not revoked in March 2013 with the remainder of the South East Plan. This policy (NRM6) was based on cross-boundary assessment of the overall level of development within the 5km zone of influence that could, with appropriate mitigation, be accommodated without giving rise to significant adverse impacts on the SPA. However, Policy NRM6 is clear that priority should be given to directing development to locations where potential adverse effects can be avoided without the need for mitigation measures. In part, this priority reflects a lack of clear evidence that the mitigation measures, including the creation of SANGs, would in fact be able to prevent new development from adversely impacting the SPA.

Option 5 therefore sets out how housing development could be planned within areas of Hart outside of the 5km zone of influence. This means focusing on the south west of Hart as a location for housing development (see map below).

Other authorities in England that have followed this approach:

Some local authorities (Rushmoor, Woking and Surrey Heath) lack any opportunity to follow this approach as their areas fall entirely within the 5km SPA zone of influence. For the other local authorities (Wokingham, Runnymede, Bracknell Forest, Maidenhead and Windsor, Elmbridge, Guildford and Waverley), no evidence was found of policy approaches that sought avoidance of the 5km zone of influence areas. Whilst these local authorities recognised the constraints imposed by the SPA, each of them looked to the provision of mitigation, including SANGs, in order to allow additional development to be proposed within the 5km zone of influence.

Although it is difficult to conclude any reasons for the absence of the 'avoidance approach', it may relate to the generally highly constrained nature of these local authority areas. Given that these authorities face multiple levels of environmental, landscape and planning constraints over extensive parts of their areas, a view appears to have been taken that it would not be possible to deliver target levels of housing growth without some contribution being made by areas subject to the Thames Basin Heaths SPA zone of influence.

How and where it could be applied:

A complicating factor regarding this option is that large scale development proposals beyond the zone of influence could be deemed to have a likely significant effect on the SPA, particularly if significant growth is proposed between 5 and 7km of the SPA⁵⁷ which would include Odiham, North Warnborough and the far south west of Hook. This option would still therefore need to be subject to a Habitat Regulations Assessment, which could conclude that without adequate mitigation a significant effect on the SPA is likely. So, in theory, SANGs could still prove necessary under this option.

⁵⁷ The Technical Assessor to the South East Plan Examination in Public recommended that between 5 and 7km from the edge of the SPA residential developments of over 50 houses should be assessed and may be required to provide appropriate mitigation. The Thames Basin Heaths [SPA Delivery Framework \(February 2009\)](#) published by the Joint Strategic Partnership Board recommends that such cases be considered on a case by case basis (Footnote 6 to paragraph 4.4).

Therefore, if new housing development proposed within Hart is to have a reasonable level of certainty that it will not give rise to significant impacts on the SPA, it would need to prioritise those areas more than 7km from the SPA. This leaves only a very small part of the District (centred on RAF Odiham, Long Sutton and South Warnborough) to consider for additional housing.

Potential scale of housing delivery:

An initial high-level review the November 2013 SHLAA indicates that between 1,400 and 1,500 homes could be developed on identified and potentially deliverable sites outside of the 5km SPA zone of influence. However, it is notable that a majority of this potential capacity is located to the west of Hook and is only just outside of the SPA zone of influence. If further testing demonstrated that housing at these sites would have a significant impact on the SPA, they would not be appropriate to rely on under this option. Equally, the overall housing capacity under this option would be limited if any of the proposed housing sites were demonstrated to have a cumulative, or 'in-combination' significant effect on the SPA, irrespective of how far outside the 5km zone of influence they were located. Lead-in times would be varied under this option depending on the size of site and the complexity of planning and other issues that needed to be resolved. A reasonable assumption would be to expect housing delivery to begin within 2 to 4 years.

The Council is also mindful of the high landscape quality in the south west of Hart. A study is underway to establish the capacity of the landscape to accommodate development in this area. In conclusion, until further work is undertaken it is very difficult to gauge with any degree of accuracy how much housing this option could deliver.

Opportunities:

- The higher the level of housing that can be delivered under this option, the less the overall adverse impact on the SPA is likely to be; and
- This option recognises the potential of the south west of Hart as the only part of the Housing Market Area (also including Surrey Heath and Rushmoor) that lies outside of the 5km SPA zone of influence.

Other benefits:

- The approach is consistent with priorities set out within Policy NRM6 of the South East Plan as the option seeks to direct development away from areas where there is a potential to adversely impact the SPA; and
- New housing is focused in one part of the District only, so benefitting other parts of Hart, which would need to accommodate only limited additional housing.

Constraints:

- The overall capacity for additional housing under this option may prove to be very limited and this option will not be able to meet the residual housing requirements for Hart to 2032;
- The infrastructure and services within the south west of Hart are unsuited to large-scale housing delivery and would require considerable upgrading;
- The high topography and open field structure of the south western part of Hart would make significant additional areas of housing prominent and would risk eroding the high-quality and distinctive chalk down-land landscapes prevalent within the area; and
- New housing growth would be directed away from where it is most needed within the Housing Market Area.

Risks:

- If it involves large-scale housing delivery, this option could result in significant adverse effects to the character of the existing settlements within the south west of Hart;
- This option could lead to unbalanced and potentially unsustainable development unless sufficient employment can be enticed to the area;
- Housing delivery in this part of Hart could affect the operation of RAF Odiham; and
- There are risks in Hart being potentially isolated as the only authority in the TBH SPA area to follow this approach. For example, if other authorities take up the 'development slack' within the zone of influence created by Hart through an avoidance approach, the overall benefit to the integrity of the SPA could be undermined.

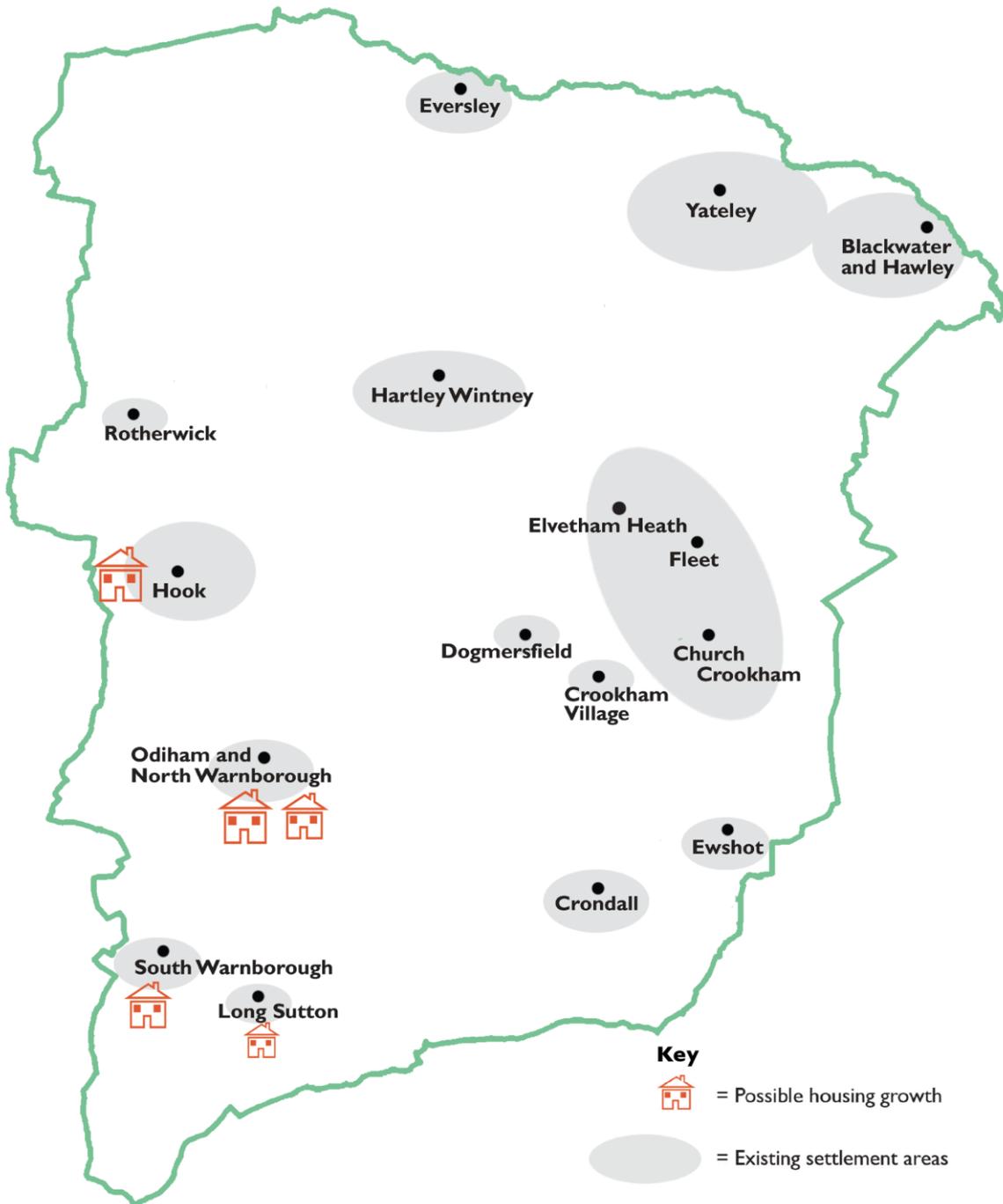
Potential to mitigate impacts on the Special Protection Area:

The intention of this option is to avoid any significant impacts on the SPA through locating new development outside of the 5km zone of influence. Therefore, mitigation of impacts should not be required.

Further work required:

This option would need to be supported by a detailed study of the capacity of the landscape in the south west of Hart to accept new sustainable development. In order to ensure that new housing would be sustainable, work would also be needed to consider the capacity for a mix of development, including employment and services. The evidence work for this option would also need to consider the impact on a number of specific factors relating to this area of Hart, including: the capacity of local infrastructure within this rural part of the District; how the character of the existing settlements could be protected; and how the operational requirements of RAF Odiham can be protected.

Option 5



* Please note that these maps are an illustration only.

SECTION 5: TAKING FORWARD THE SELECTED OPTION OR OPTIONS

Introduction

- 5.1 Following consultation on this document, and an assessment of responses received, the Council will determine its preferred option or options for development. The feedback that is received through the consultation will be an important part of the Council's decision-making process on its proposals.
- 5.2 Additional research and assessment work is already being undertaken to inform the next stages of plan preparation, with the intention that a draft Local Plan will be published for consultation in early 2015.
- 5.3 At this stage, the Council retains an open mind as to the most appropriate planning document to prepare, given that in some respects the development option or options that are selected may be implemented in different ways. The different planning policy mechanisms that could be used to take forward the options are briefly set out below, for information.
- 5.4 Three key planning policy mechanisms are considered: the main local plan document; a local plan site allocations document and neighbourhood planning.
- 5.5 There could potentially be additional mechanisms available, such as the use of 'Local Development Orders' which remove the requirement for certain types of development to apply for planning permission, based on a number of overall policy objectives for a given area. However, such mechanisms are not generally used for planning housing development and are unlikely to be considered suitable for such purposes in Hart.

Main Local Plan Document

- 5.6 Unlike old-style local plans, such as the Hart District Local Plan (1996-2006), new local plans are much more flexible in what they can contain which, in theory at least, helps local authorities to put local plans in place more quickly, for example, by splitting the local plan between different documents that are prepared sequentially.
- 5.7 In essence, new local plans can be viewed on a spectrum. At one end of this are shorter local plan documents, limited only to the main functions of setting out the area's vision, key spatial strategies and broad overarching policies or major strategic allocations. At this end of the spectrum, a local plan would be very similar to a 'Core Strategy', such as those introduced under the 'Local Development Framework' system by the previous Government.
- 5.8 At the other end of the spectrum, a local plan could be prepared to contain all of the detailed allocation and development management policies, in addition to the high-level strategies within one document. National planning policy makes a preference for local authorities to prepare this sort of comprehensive planning document. However, no requirement to take this approach is stipulated and it is accepted that circumstances within different areas will dictate the most suitable approach. In practice, the length of time it would take to prepare such a document has meant that very few local authorities have chosen to follow this route.
- 5.9 The 'main local plan document' being considered here falls between these two extremes and would be likely to cover the overarching strategies and key policies as well as some site allocations, particularly for larger sites or those proposed to be delivered early in the plan period.
- 5.10 The law does not require a local authority to prepare a local plan, but national planning policy sets out this as a clear expectation. Local plans are prepared following a series of stages laid down by the Planning and Compulsory Purchase Act 2004 and the Local Planning Regulations 2012. A description of the main stage of local plan preparation was provided in Section 1 of this document.

5.11 All five housing delivery options set out within Section 4 above would need to be set out as part of the overall spatial strategy for Hart within an initial local plan document. However, the level of detail required at the initial local plan stage would vary depending on the option(s) taken forward:

- **Option 1 (Settlement Focus)** and **Option 2 (Dispersal Strategy)** would potentially require only a high-level approach with the majority of site-specific detail being possible to defer to a site allocations document or to neighbourhood planning.
- **Options 3 and 4 (Focussed Growth)** envisage a small number of sites being relied upon to deliver the bulk of Hart's housing requirements. In order to achieve sufficient certainty of delivery, more detail would be required within an initial local plan document, supported by a range of evidence. Depending on the timing of delivery expected, this could amount to identifying an area of search, with a subsequent site allocations document being used to define site boundaries and precise target for housing delivery and to allocate the site for development.
- **Option 5 (Focussing development away from the Thames Basin Heaths SPA Zone of Influence)** would need to be covered in detail within an initial local plan document due to the high degree of risk surrounding the deliverability of large-scale housing delivery within one small part of the District.

Local Plan Site Allocations Document

5.12 A site allocations document is a part of the local plan that is prepared and adopted following the adoption of the main local plan document and which deals with the site specific allocations of land. Some local authorities have also included general development management policies within such a document.

5.13 As a site allocations document follows the adoption of a local plan strategy document, it must be in conformity with the adopted part of the Local Plan. However, where necessary, a site allocations document can undertake a partial review of the earlier document, where this relates to a topic covered by the site allocations document.

5.14 The idea of a separate document detailing site allocations is not new and was an integral part of the Local Development Framework system introduced by the previous Government. In the current local plan system, the main reason for following this route rather than producing a comprehensive local plan is the reduction in detail and time required preparing the local plan strategy document, because the majority of site proposals can be deferred to a subsequent stage.

5.15 The following housing delivery options could be appropriately taken forward through the preparation of a site allocations document, following the adoption of the local plan strategy document:

- **Option 1 (Settlement Focus)** and **Option 2 (Dispersal Strategy)** both rely on the delivery of a larger number of generally small-scale sites and this approach is well-suited to being taken forward through a site allocations document.
- **Options 3 and 4 (Focussed Growth)** rely on a small number of large 'strategic' sites and this approach would need to be taken forward with the initial local plan strategy document to provide greater certainty about delivery. The question of whether a site boundary would need to be defined at an early stage would depend on the circumstances, including the timing of delivery expected. Where delivery was anticipated only later in the plan period, use of a site allocations document to provide detailed policies, including the definition of the site boundary and targets for delivery, would be appropriate.
- **Option 5 (Focussing development away from the Thames Basin Heaths SPA Zone of Influence)** would need to be taken forward primarily through the main local plan document in order to provide sufficient certainty that the approach would be deliverable. It would be unlikely that the allocation of specific sites required under this option could be deferred until a later stage.

Neighbourhood Planning

- 5.16 This mechanism takes advantage of the new layer of planning introduced by the Localism Act 2011 whereby 'Neighbourhood Areas' are empowered to create plans which, once examined and passed at a local referendum, are adopted as part of the local authority's development plan.
- 5.17 For Hart, this would involve engaging the 21 Parish and Town Councils on the need for housing delivery across the District and agreeing a set of broad housing delivery targets, relating to locally derived needs, for each parish/town to achieve. The local housing targets would then be taken forward by the Parish/Town Councils as allocations within Neighbourhood Development Plans (NDPs) or as Neighbourhood Development Orders (NDOs) or Community Right to Build Orders (CRTBOs). Hart District Council would be expected to provide assistance to the local councils as they progressed the neighbourhood planning, but would not direct where the new housing should go.
- 5.18 As Hart is entirely 'parished', the structures already exist for Parish and Town Councils to register as 'neighbourhood areas', if they wish to, and go on to prepare neighbourhood plans, and two parish councils (Crookham Village and Odiham) have already applied to become 'Neighbourhood Areas'. Neighbourhood plans can be prepared at any point, but where the local authority has an adopted Local Plan, the neighbourhood plans must in conformity with the strategic policies within that plan. In practice, where the neighbourhood plan intends to allocate sites for development they are more likely to be successful where they are prepared following the adoption of the authority's local plan.
- 5.19 Neighbourhood planning as a mechanism for developing planning policy combines best with **Option 1 (Settlement Focus)** and **Option 2 (Dispersal Strategy)**, which are focused on housing growth within or adjacent to existing settlements and as modest extensions. Given that neighbourhood planning is voluntary, there would need to be some pragmatism over the extent to which NDPs could be expected to achieve target numbers of homes. Therefore, care would be needed to avoid relying too heavily on this mechanism to progress planning policy for sites selected as a part of Options 1 and/or 2. Hart District Council would still need to prepare a site allocations document to allocate the residual local housing sites and any strategic sites.
- 5.20 Neighbourhood planning is less compatible with all of the remaining housing delivery options, as these rely on strategic site selection decisions that can only be made through the Hart Local Plan. However, it is important to note that neighbourhood planning is a right of local communities and, irrespective of which housing options are selected by the Council, there is a duty under the Localism Act to support neighbourhood plan preparation where parish/town councils wish to undertake this work.

APPENDIX A: SUMMARY EVIDENCE BASE REVIEW

The table below provides a summary of the current and emerging evidence base that the Council will be able to draw upon to support the preparation of the new Hart Local Plan.

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
HOUSING					
Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (SHMA)	Wessex Economics	June 2014	The scale of housing required across the housing market area, the need for affordable housing, evidence on the mix of housing tenures and sizes required.	NPPF (Paragraphs 47 and 50) specifically requires this evidence to underpin local plan housing numbers and targets	Completion of this joint study is a crucial step in the early preparation of a new Hart Local Plan. This is likely to be sufficient evidence on housing need/requirements assuming a local plan can be prepared within about 2-3 years.
Strategic Housing Land Availability Assessment (SHLAA)	Hart District Council	November 2013 (but is usually updated at least annually)	Identifies specific sites with potential for housing delivery and assesses their suitability, availability and whether or not they are developable.	NPPF (Paragraph 47) requires a list of deliverable and developable housing sites to be maintained	Hart District Council has opted to make regular 'calls for new sites' to be identified and is updating the SHLAA evidence on its website frequently, as new sites are made known to the Council. This is good practice and provides an important basis for the preparation of housing development options in this paper and in the local plan itself.
Affordable Housing Viability Study	Three Dragons	May 2009 (updated January 2011)	Considers financial viability across the District in relation to the securing of affordable housing as a percentage of overall housing completions	NPPF (Paragraphs 173 – 177) requires plans to be deliverable, including evidence that the burdens imposed on development will not threaten deliverability.	This study was prepared during the recession and its update preceded the beginnings of the more sustained recovery of the housing market. Given this and the wider need for area-based viability evidence to support the local plan and Community Infrastructure Levy, it is recommended that this evidence is further refreshed as part of that wider work.
Housing Supply and the Thames Basin Heaths Special Protection Area	Adams Hendry and Baker Shepherd Gillespie Ecology and	To be published July 2014	Will establish the level of housing growth above which an appropriate assessment would need to be required with planning applications. It	Required to help the Council demonstrate that its proposals within a new Local Plan will not significantly harm the integrity of the SPA.	This study will form an important part of the evidence underpinning the selection of options for delivering new housing within Hart and beyond this will influence the preparation of development management policies for all housing proposals within 5 km of the SPA. The

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
	eCountability		will also consider whether there should be a cap on the level of housing development within 5km of the SPA areas.		study will also inform the Strategic Environmental Assessment of the Local Plan and the Habitats Regulations Assessment.
Landscape Capacity Study	Hart District Council	Expected Dec 2014	This study will consider the capacity for development to be accommodated in Hart in terms of potential landscape impacts.	The NPPF seeks to protect and enhance valued landscapes.	Hart is a rural area and as such it is important that landscape is taken into account when considering how much and where development should take place. It will inform the assessment of SHLAA sites needed to deliver whichever is the preferred strategy.
Development site appraisal study	Hart District Council	Not yet commenced	Detailed appraisals of potential development sites in the SHLAA.	To inform decisions on which sites should be allocated in the Local Plan.	This is a critical study to inform the preferred site allocations and broad locations for inclusion in the plan.
Hart Gypsy and Traveller Accommodation Assessment	URS	May 2013	An assessment of gypsy and traveller permanent and transit accommodation needs in Hart for the period 2012 to 2017	National policy (Planning Policy for Traveller Sites) requires local authorities to regularly assess the accommodation needs of gypsies and travellers in their area	As the current evidence looks only as far as 2017, a new study will be required to support the new Local Plan.
EMPLOYMENT AND ECONOMY					
Hart District Profile	SQW	March 2011	An analysis of the economy of Hart encompassing economic structure and flows, competitiveness, business and enterprise and the nature of Hart's communities	NPPF (Paragraph 160) requires local authorities to have a clear understanding of business needs. This in turn requires an understanding of how the local economy is structured and what the key opportunities and barriers are that need to be addressed within a local plan.	This study is a few years old now and since being produced the 2011 Census data has been released and the sustained economic recovery has commenced. However, its role is largely background evidence and it is unlikely to require any updating prior to work on the local plan commencing. However, as the local plan is prepared, the evidence should be supplemented with recent data to inform the economic/employment policies. The Enterprise M3 Local Enterprise Partnership (LEP) should be involved in this process and may be able to assist with any updating required.

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
Employment Land Review for Surrey Heath, Hart and Rushmoor	Nathaniel Lichfield and Partners	November 2009	An assessment of demand and supply factors in relation to employment land and floorspace, including analysis of future market requirements and an appraisal of employment sites across the area with policy recommendations for protecting or releasing sites as appropriate.	NPPF (Paragraph 160 and 161) requires local authorities to have a clear understanding of business needs, including the current and future land and floorspace requirements and a review of land currently available employment land	The current evidence is now out of date and will require refreshing. Paragraph 161 of the NPPF is quite detailed in the scope of the evidence required, with an emphasis on a regular updating alongside or combined with the SHLAA. A further joint study would be good practice considering the clear economic and commuting links between the three authorities, as set out in the joint SHMA. Any evidence work in area would require close collaboration with the Enterprise M3 LEP.
Defining Hart's Functional Economic Area	Wessex Economics	July 2014	The study will propose a functional economic area (for plan-making purposes) within which Hart sits.	The NPPF requires planning for economic development needs across functional economic areas under the duty to cooperate.	This study is the first step towards a refreshed evidence base, potentially prepared jointly with other local authorities within the functional economic area.
RETAIL AND COMMERCIAL CENTRES					
Retail Study Update	Roger Tym and Partners	March 2012	This is a significant update to an earlier 2006 retail study. In addition to a general update to ensure compliance with national policy at that time, it sought to address a number of specific issues considered important by HDC.	NPPF (Paragraph 23) requires that the extent of centres and shopping areas is defined and that the need for retail, leisure and office floorspace within centres is clearly understood.	Whilst the current study appears to provide a robust update on Hart's retail spending patterns and retail floorspace requirements, its analysis only goes as far as 2026 which will not be sufficient for the new Hart Local Plan. As a minimum, it may be possible to undertake a further update to take account of changes in national policy, the 2011 Census and latest retail trends and developments and to extend the evidence horizon to 2032. Failing that, a new retail study is likely to be required.
Audit of Existing Uses Within the Town and Village Centres of Hart District	Hart District Council	December 2010	This provides a snapshot of existing uses within the six largest town/village centres within Hart. This was intended as a monitoring tool to enable patterns of change to be	Whilst not specifically required by the national policy, this type of study is valuable in providing evidence for the review of commercial centre boundaries and shopping frontages, which are	The study was undertaken in 2009 and again in 2010, but has not been repeated since. An update will be required to support retail and commercial centre policies within a new Hart Local Plan. This could be undertaken as part of a wider new retail study (see above) or through a repeat of this study by the Council itself.

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
			identified.	requirements of Paragraph 23 of the NPPF.	
ENVIRONMENT					
Blackwater Valley Water Cycle Study Scoping Report	Halcrow	April 2011	Sets the scene, gathers baseline data and identifies potential issues for an outline water cycle study to examine at a later stage. The objective of the study is to demonstrate that planned development within the Blackwater Valley catchment area is sustainable with respect to the water environment and infrastructure.	There is no national policy requirement to complete a plan-level water cycle study. The Council will therefore seek to engage with the relevant authorities and organisations (including the Environment Agency and Water Companies) to ensure that water quality and supply are properly addressed.	The scoping report is considered to be sufficiently up to date to support the subsequent outline study if it is required. This would depend on the nature and scale of new development proposed within Hart (most of which falls within the Blackwater Valley catchment area), including its likely impact on water resources and quality and on the water infrastructure capacity. If needed, an outline water cycle study could be jointly produced by all of the local authorities that fall within the catchment area.
Blackwater Valley Strategic Flood Risk Assessment	Capita Symonds	March 2008	Provides a full strategic (i.e. plan-level) flood risk assessment (SFRA) for the parts of the Blackwater Valley that fall within Hart and Surrey Heath.	NPPF (Paragraph 100) requires local plans to be supported by a SFRA which should inform development proposals and consider the need for flood risk mitigation where appropriate.	The existing SFRA is now over 6 years old and is being updated to reflect the latest available information including the Environment Agency's flood zone map revisions, for example, to introduce new surface water flood mapping; and to reflect the most recent flood events to impact the Blackwater Valley, during the winter of 2013/2014.
North Hampshire Renewable Energy and Low Carbon Development Study	AECOM	March 2010	A joint study undertaken by Basingstoke and Deane, Hart and Rushmoor to provide an evidence base to support the development of renewable energy and sustainable construction policies.	There is no national policy requirement to undertake this sort of study, although it would be required where local plans sought to include specific requirements or targets for renewable energy generation or sustainable construction within local plans.	The study produced was of a type promoted by the now cancelled Supplement to PPS1 on Climate Change. The current government is seeking to replace district-level standards with uniform national standards. Assuming this is introduced and HDC proposed to adopt any higher national standards (i.e. beyond those that will be integrated into Building Regulations), robust local justification will be required and this may give rise to a need to update the current study.

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
<p>Hart District Landscape Assessment</p> <p>And</p> <p>Hampshire Integrated Character Assessment</p>	<p>Scott Wilson</p> <p>Hampshire County Council</p>	<p>April 1997</p> <p>May 2012</p>	<p>These studies provide a comprehensive characterisation of Hart's landscapes, describing the elements that contribute to character and evaluating the quality of each landscape character area. Management guidelines are also provided to assist in the development management process.</p>	<p>There is no national policy requirement to undertake this sort of study, although Paragraphs 109 and 113 of the NPPF are clear that the planning system should contribute to protecting and enhancing valued landscapes, including through criteria-based policies within the Local Plan. This requires a clear understanding of the character and quality of the landscapes involved.</p>	<p>Both these studies illustrate the importance and varied character of Hart's landscapes and provide a useful reference for the landscape capacity work referred to above.</p>
<p>Open Space, Sport and Recreation Assessment</p>	<p>Hart District Council</p>	<p>June 2012</p>	<p>Produced as an update to the 2006 PPG17 Assessment, it assesses the quantity, quality and accessibility of existing open space, sport and recreation facilities within Hart District. The study also seeks to set local quantity, quality and accessibility standards to support the Local Plan.</p>	<p>NPPF (Paragraph 73) requires planning policies to be based on robust and up-to-date assessments of the need for open space, sports and recreation facilities. The need can relate to quantity or quality deficiencies.</p>	<p>A new study is needed that provides an up to date audit and picture of needs regarding not just open space but also indoor sports facilities and playing fields using an approach that complies with Sport England's recently revised guidance. In addition, if standards for facilities are to be translated into planning policy, some work to cost the burden this would create on new development would be required.</p>
THAMES BASIN HEATHS SPECIAL PROTECTION AREA					
<p>Thames Basin Heaths Strategic Access Management and Monitoring – Tariff Guidance</p>	<p>Natural England</p>	<p>March 2011</p>	<p>Sets out guidance for TBH SPA authorities to implement the tariff agreed under the earlier Delivery Framework. The guidance covers the setting of the tariff rate, collection and how the funds raised will be spent.</p>	<p>Following agreement across the TBH SPA area that a tariff was needed to fund strategic access management and monitoring to help mitigate the impacts of new development on the SPA, guidance was needed to ensure that the tariff was in</p>	<p>Although the legislation and guidance on the use of section 106 for pooling developer contributions has changed significantly with the introduction of CIL, the funding objectives for the tariff are not considered to be 'infrastructure' and are therefore not impacted by the changes. This means that the guidance is still relevant to the preparation of a new Hart Local Plan.</p>

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
				accordance with national policy and that it was collected in a consistent way by the relevant authorities.	
Thames Basin Heaths SPA Delivery Framework	Thames Basins Heaths Joint Strategic Partnerships Board	Feb 2009	This documents sets out the key principles and overall framework for TBH SPA authorities to follow in planning their areas to avoid harm to the SPA. It covers the types of development affected and the sorts of mitigation that was agreed to be required.	The need for this jointly agreed delivery framework came out of the work to prepare the South East Plan. As policy NRM6 of that plan remains extant, the delivery framework is required as an agreed mechanism to implement Policy NRM6.	Whilst the delivery framework remains relevant, what has been lacking to date is the evidence to demonstrate that the mitigation approaches required within the framework are effective and are likely to remain so. This gap is being addressed by the study currently being prepared for Hart by Adams Hendry and eCountability on Housing Supply and the Thames Basins Heaths SPA.
TRANSPORT					
Preliminary Transport Assessment	HTP Consulting	April 2010	This compares the transport sustainability of a range of potential development locations that were drawn from the 2009 SHLAA and undertakes a Stage I Transport Assessment of the impact these developments could have on transport infrastructure.	The NPPF (Paragraphs 31 and 32) expects developments that generate significant amounts of movement to be supported by a transport assessment. It is not possible to leave this until the application stage however, and high-level transport assessments that cover the development proposed within a local plan will be required.	This preliminary transport assessment was prepared for the work at the time on Hart's Local Development Framework. Technically out of date, nevertheless it provides some useful pointers for parts of the highway network under stress and the relative sustainability of different some different SHLAA sites in terms of access to facilities. However further work would need to be undertaken during the preparation of the Local Plan, ideally as soon as a full list of potential developments sites across the District has been identified.
Transport Assessment for the M3 Corridor J3-4a Joint LDF Study	Surrey County Council	May 2011	Studies the likely cumulative impacts of development proposed in Hart, Rushmoor and Surrey Heath on the strategic and local route networks in the vicinity of	As above	The study used two scenarios, the first based on committed developments between 2005 and 2026 and the second adding some estimated non-committed development. The extent to which the study remains up-to-date will depend on the extent to which these scenarios remain relevant in terms of the level of development

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
			the M3 motorway, through use of the Surrey County Transport Model (SINTRAM).		being proposed within the study area. In any event the impacts of development on the strategic highway network will need to be addressed in a new Transport Assessment (see below). The Highways Agency (which has responsibility for the M3) will be engaged on that study.
Transport Assessment Mitigation Corridor Study Report	WSP	March 2013	Provides an assessment of the impacts of traffic generated by the proposals contained within the Pre-Submission Core Strategy of 2012 on key selected junctions and corridor routes. The study also recommends appropriate mitigation of the impacts where appropriate.	As above	This is an up-to-date report, although with the withdrawal of the Core Strategy, the extent to which it remains relevant depends on whether the developments included in the study are included as options within a new Local Plan. It is likely that much of the analysis and advice on mitigation will remain relevant and could be incorporated within an updated version of the study to support proposals within the new Local Plan.
SETTLEMENTS					
Urban Characterisation and Density Study	The Conservation Studio	2010	Identified and described the form and character of the six main settlements within Hart, including the patterns of density, and made recommendations on the form future development within these settlements might take, including key design principles.	The NPPF (in particular paragraphs 56 to 58) strongly encourage good design and effective place making and this requires an understanding of the defining characteristics of existing settlements within an area.	This is a comprehensive study of the character and form of the six settlements included and was directed at informing the development of SPDs to cover urban characterisation and density. The SPD were never finalised as far as we are aware, but the evidence base remains relevant for the preparation of a new Hart Local Plan.
A Settlement Hierarchy for Hart District	Hart District Council	January 2010	This sets out the rationale and evidence behind the creation of Hart's current settlement hierarchy	Although a settlement hierarchy approach is not specifically required under current national policy, the NPPF (for example,	Whilst the approach taken in the document remains valid, the study would benefit from an update to the evidence base underpinning the hierarchy to take account of recent changes to the population and the levels of services and

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
				Paragraph 55) encourages the identification of sustainable locations for new housing, particularly in more rural areas. Settlement hierarchies are one means of seeking to achieve this.	infrastructure within settlements and villages across the District.
INFRASTRUCTURE					
Infrastructure Delivery Plan and Implementation Strategy	Hart District Council	-	This would need to identify the infrastructure required to deliver the proposals set out within a new Local Plan, including the timing of delivery, key responsibilities and as much detail as possible about the costs involved and how the infrastructure will be funded and delivered when it is required.	The NPPF (Paragraph 162) tasks local planning authorities with carrying out assessments of the quality and capacity of infrastructure to meet the forecast demands, including from new development proposals. Understanding what infrastructure is required to meet the needs of proposed development and how it can be delivered is fundamental to the soundness of local plans. This process is also required in order to be able to introduce Community Infrastructure Levy.	Infrastructure is a priority issue in the local plan and engagement with infrastructure providers will be ongoing. The most productive engagement tends to happen later in the process when providers can assess the implications of a draft local plan and respond accordingly.
SUSTAINABILITY APPRAISAL					
Sustainability Appraisal Scoping Report	Hart District Council	April 2014 (Draft)	This updated Local Plan SA Scoping Report refreshes the baseline information as the first stage in the SA (incorporating Strategic Environmental Assessment). It sets out relevant policies, plans	The requirement for sustainability appraisal for local plans is set out within the Planning and Compulsory Purchase Act 2004. In addition, EU law requires the undertaking of Strategic Environmental Assessment (SEA) of plans and	The new SA scoping report is currently being consulted on by HDC and, once finalised it will provide a foundation for the later SA/SEA stages that will need to be undertaken alongside and informing Local Plan preparation.

Name of study	Produced by	When completed	What it covers	Why it is needed	Comments
			and programmes that need to be taken into account and it establishes the sustainability objective framework which will be used to test emerging local plan options and policies.	programmes and these processes are generally undertaken together.	

APPENDIX B: REVIEW OF HART'S MAIN EMPLOYMENT SITES

Evidence Base

This review has drawn on a number of sources, including the Council's online planning system, the Employment Land Review for Hart, Rushmoor and Surrey Heath (NLP, 2009), Hart District Council's Development Plans, and discussions with Council Officers and a local Commercial Agent

Site Name	Location/ Settlement Boundary?		Current use (Area)	SHLAA site?	Planning status	Significant constraints	Outcome of Employment Land Review (2009)	Potential for redevelopment to housing
Waterfront Business Park	North Fleet, adjacent to railway station	Y	Mix of commercial and industrial, including a hotel. Some plots/ buildings are vacant (4.4 Ha.)	Y (1/3 of site - SHL50)	<ul style="list-style-type: none"> • 'Saved' LP Policy DEV16 	Fleet Pond SSSI adjacent, some trees subject to TPO	24/30 – High quality employment area on managed estate	Low . Considered to be valuable for employment use given location with strong interest in vacant plots
Ancells Business Park	North of Fleet	Y	Mix of commercial, storage and industrial with a complex landownership position and a considerable number of vacancies (15.6 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy 	Parts of site subject to Flood zones 2 and 3, SSSI adjacent to the east. Potential noise constraints from M3	22/30 – Relatively high quality site, well maintained but with high vacancy rate. Poor access by public transport	High . Level of long-term vacancies (agent reports 40- 50% in western area) allows for consolidation and partial redevelopment for housing, subject to M3 noise levels (50-100 homes?). Long term, Ancells future as a business park is constrained by out- dated stock and lack of cohesive management.
Pyestock A	Within countryside between Fleet and Farnborough	N	Mostly vacant brownfield former DERA site (47.5 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy DEV12 • Extant permission for B8 storage uses 	Whole site subject to blanket TPO, a number of SINCs and an SSSI are adjacent	24/30 – High quality due to size and strategic location, although isolated from public transport	Low . Housing at this site would be isolated in countryside and redevelopment as new settlement is constrained by proximity to SPA and other environmentally sensitive areas

Site Name	Location/ Settlement Boundary?		Current use (Area)	SHLAA site?	Planning status	Significant constraints	Outcome of Employment Land Review (2009)	Potential for redevelopment to housing
Pyestock B	Within countryside between Fleet and Farnborough	N	Mostly vacant brownfield former DERA site (12 Ha.)	Y (SHL35)	<ul style="list-style-type: none"> • ‘Saved’ LP Policy DEV13 • Extant permission for data centre buildings 	South of site is within SPA exclusion zone	22/30 - High quality due to size and strategic location, although isolated from public transport	Low. Housing would be isolated within the countryside and close to SPA. Recent permission granted for new data centres and a further data centre under construction
Redfields Industrial Estate	South of Church Crookham	Y	Mostly developed with mix of industrial and office units. New area to north including nursing home and small office units with current application for 72 assisted living units (5.7 Ha.)	N	<ul style="list-style-type: none"> • ‘Saved’ LP Policy DEV3 Current applications pending 	None	18/30 – Average quality due to poor access to strategic highway network and weak landscaping	Low. Available development areas are now under construction or subject to current planning. Established employment area is mainly let
Grove Farm	Between Church Crookham and Crookham Village	N	Mix of smaller light industrial and storage units, mostly within converted farm buildings. Thought to be fully let (1.2 Ha.)	N	<ul style="list-style-type: none"> • ‘Saved’ LP Policy RUR16 	Within Conservation Area and adjacent to Basingstoke Canal. Several listed buildings on site	18/30 – Average to low quality due to isolated location and poor access to strategic road network	Low. Isolated within countryside and subject to heritage constraints. Overall the site is fully let and is considered a valuable employment site to meet local needs
Fleet Business Park	South east of Church Crookham	Y	Well-established range of office, light industrial and storage units, believed to be fully let (2.4 Ha.)	N	<ul style="list-style-type: none"> • ‘Saved’ LP Policy URB7 	Southern fringe of site is within a SINC and close to SPA exclusion zone	18/30 – Average to low quality due to limited access to public transport and strategic road network and low profile due to screening trees	Low. Fully developed and believed to be fully let. Redevelopment also limited as site is surrounded by trees which are either subject to TPO or within a SINC

Site Name	Location/ Settlement Boundary?		Current use (Area)	SHLAA site?	Planning status	Significant constraints	Outcome of Employment Land Review (2009)	Potential for redevelopment to housing
Martin Lines	South east of Church Crookham	Y	Partially developed new employment park, the south of which is occupied by Vertu. The north of the site remains undeveloped (5.7 Ha)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy DEV4 	Most of the site, including all of the undeveloped areas is within the SPA exclusion zone	20/30 – Average quality due to limited access to public transport and strategic road network	Low. Although there are parts of the site yet to be developed, these are within 400m of the SPA and are therefore not suitable for housing development
Potters Industrial Park	Within Church Crookham	Y	Fully developed with small-scale light industrial units and is believed to be fully let (0.5 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy URB7 	None	12/30 – low quality due to small size, proximity to housing and poor access to strategic network	Low. Site is believed to be fully let and is meeting needs for small industrial premises. Location of site within 400m of the SPA effectively prevents new housing development.
Blackwater Industrial Park	North of Blackwater	Y	Newly developed office park near railway station, with good quality landscaping but with high vacancy rate (9.4 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy DEV14 	Much of the site is within Flood zones 2 and 3	25/30 – High quality due to access to M3, railway and good landscaping. High vacancy rate also noted	Low. Although vacancy rates are high and the location sustainable, the flooding constraint and the lack of nearby retail/services make housing development less appropriate
Blackbushe Industrial Estate	South of Yateley	Y	Large modern industrial estate comprising light industrial and storage units. Environmental is well maintained, but vacancy rates are quite high (8.2 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy URB7 	Entire site is within the SPA exclusion zone	20/30 – Average quality due to, limited public transport and access to services. Relatively high vacancy rate noted	Low. Housing development would not be suitable as site is within 400m of the SPA

Site Name	Location/ Settlement Boundary?		Current use (Area)	SHLAA site?	Planning status	Significant constraints	Outcome of Employment Land Review (2009)	Potential for redevelopment to housing
Bartley Wood	South of Hook	Y	Large modern and high quality business park with high profile and recently extended to west. Low vacancy rate (9.6 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy URB7 	An SSSI constrains the site to the south	27/30 – Highest quality employment site within Hart. Access to M3 and high quality environment are key factors.	Low. This is a high quality modern business park that is almost fully let and is believed to be attractive to the market
Rawlings Road Business Park	South of Hook	Y	Large area of mixed industrial, storage and office uses, developed over time. Tesco store occupies north of site. Lacks comprehensive management and has some vacancies (19.4 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policies URB7 and H5 	An SSSI constrains the site to the south	25/30 – High quality site due to transport access and proximity to services	High. Agent reports relatively high level of vacancies, with more in the future (if BMW and EDF move out). Also, close proximity to existing residential areas makes this site potentially suitable for redeveloping as housing, although it is believed that Tesco may also seek expansion into the site. (50-100 homes?)
Murrell Green Business Park	Between Hook and Hartley Witney	N	Fully developed area of smaller light industrial and office units that is fully let (2.5 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy RUR16 	None	20/30 – Average quality site due to isolation from services and limited scope for parking	Low. Site is isolated within the countryside and is believed to be fully let and meeting the need for SME business premises
Lodge Farm	Between Hook and North Warnborough	N	A mix of agricultural, office, distribution and other uses based on a diversified farm. Believed to be fully occupied (3.3 Ha.)	N	<ul style="list-style-type: none"> • 'Saved' LP Policy RUR16 	Much of the site is within flood zones 2 and 3	20/30 – Average quality with very good road links but no accessibility by public transport.	Low. Site is isolated in the countryside and provides for the need for small rural business premises. Flood risk constraints are also likely to make housing unsuitable at this location

Site Name	Location/ Settlement Boundary?		Current use (Area)	SHLAA site?	Planning status	Significant constraints	Outcome of Employment Land Review (2009)	Potential for redevelopment to housing
Eversley Haulage Park	Between Hartley Witney and Yateley	N	A mix of distribution and open storage uses on an untidy but fully developed and fully occupied site (2.4 Ha.)	N	<ul style="list-style-type: none"> • Saved' LP Policy RUR16 	Site is within the Thames Basin Heaths SPA	18/30 – Average to low quality due to its isolation from services and public transport and poor environment	Low. Housing at this location is unsuitable as it is within the TBH SPA
Brickyard Plantation	North west of Elvetham Heath, adjacent to M3 motorway	Y	Vacant cleared greenfield site (2.4 Ha.)	Y (SHL32)	<ul style="list-style-type: none"> • Current implemented permission for BI uses, but not yet developed 	Site is subject to a blanket TPO, although the trees within the site have been cleared. Site is adjacent to the M3 and noise levels will be high	13/30 – Low quality due to relatively poor access to strategic road network	Medium. If the permitted BI uses are developed, this could function as a useful small-scale employment site. If the development does not materialise, housing (30-50 homes) may be a better long- term use for the site, subject to the M3 noise constraint
Guillemont Park North (Former Sun Microsystem s)	Within the countryside but adjacent to Farnborough south west of Hawley	N	A large modern office campus designed for a single occupier that has now vacated the premises. (10.3 Ha.)	Y (SHL152)	<ul style="list-style-type: none"> • Saved' LP Policy DEV10 	Northern portion of the site is within 400m of the SPA. Site is adjacent to a SINC.	25/30 – High quality employment site due to excellent links to strategic and local road network and attractive environment	Low. This is a high quality employment site, although it is believed to be completely vacant, with the buildings currently being marketed for BI use. The location is potentially sustainable, relates well to the outer suburbs of Farnborough and may be able to accommodate 100-200 homes. However, the site is very close to and partially within 400m of the SPA and mitigation of the effect on the SPA would be required.
Guillemont Park South	Within the countryside but adjacent to	N	A vacant portion of large modern office campus that was only partially	Y (SHL152)	<ul style="list-style-type: none"> • Saved' LP Policy DEV10 • The site straddles the 	Site is adjacent to a SINC. Eastern part of the site is within Rushmoor	25/30 – High quality employment site due to excellent links to strategic and local	High. Although this is a high quality employment site, it was never completed as part of the BI office campus to the

Site Name	Location/ Settlement Boundary?	Current use (Area)	SHLAA site?	Planning status	Significant constraints	Outcome of Employment Land Review (2009)	Potential for redevelopment to housing
	Farnborough south west of Hawley	completed with 2 incomplete steel- frame structures (3.4 Ha.)		Hart/ Rushmoor boundary. An application for 150 homes was approved by HDC, but refused by Rushmoor BC.	Borough	road network and attractive environment	north. The location is potentially sustainable, relates well to the outer suburbs of Farnborough.