

**Hart Local Plan – Consultation on Revised Options for Strategic
New Homes Growth and Site Allocations**

1. Purpose of Decision

- 1.1 As part of the preparation of its new Local Plan, Hart District Council has published a “Refined Options for Strategic New Homes Growth and Site Allocations”, and a draft Local Plan Vision and Strategic Priorities, for public consultation. The purpose of the consultation is to identify the most positive way to plan for the additional growth identified in the Strategic Housing Market Assessment, 2014 (SHMA), which Hart has prepared jointly with Rushmoor and Surrey Heath Councils. The deadline for comments is 15th January 2016. For Hart, the next stage will be the publication of a draft (Preferred Approach) Local Plan for consultation in the summer of 2016.
- 1.2 The Council commented previously on Hart District Council’s consultation on its Housing Development Options, in October 2014. The Cabinet report and the minutes of this meeting are available to view on the Council’s website at <http://www.rushmoor.gov.uk/article/7211/Cabinet-meeting---7-October-2014>. The purpose of this report is to provide a response to the current round of consultation on the emerging Hart Local Plan.
- 1.3 However, it is important to note that Hart, Rushmoor and Surrey Heath Councils are at present jointly undertaking an update to the evidence base relating to housing and employment needs to inform the preparation of their respective Local Plans. The response set out in this Cabinet report is based on the context provided by the current evidence base, dated 2014. It may be that once this evidence base is updated, some of Rushmoor’s comments may change or fall away, particularly when Hart publishes a complete version of its Local Plan for consultation, based on the most up to date evidence.

2. Context: National Planning Policy

- 2.1 Before moving to the detail of the Hart consultation, it is useful to provide some context for Rushmoor’s interest in the preparation of the Hart Local Plan. The requirement for joint working on strategic planning matters is rooted firmly in national policy, to which all Councils are required to adhere in Local Plan preparation. Hart, Rushmoor and Surrey Heath Councils are together defined as a [Housing Market Area](#) (HMA). This definition is based on key linkages such as cross boundary commuting patterns and migration trends, and focuses on those neighbouring authorities with the strongest links in the first instance. The [National Planning Policy Framework](#) requires Housing Market Area partners to ensure that their Local Plans together meet the full, objectively assessed needs for market and affordable housing in the HMA within which they fall.

2.2 The National Planning Policy Framework (NPPF) provides the key policy context for Plan making. It states that in *Planning Strategically Across Boundaries*, public bodies have a duty to cooperate on strategic priorities, including the homes and jobs needed in an area. Notably, it sets out in paragraph 178 that the;

“...Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.”

2.3 Paragraph 179 goes on to note that;

“Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles or policies of this framework.”

2.4 At Examination, the authorities’ respective Local Plans will be tested for “soundness”. Paragraph 182 of the NPPF explains what is required for a Local Plan to be found sound, namely that it 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** (emphasis added)*
- *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** (emphasis added)*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework*

2.5 These policy requirements in the NPPF, particularly regarding the need for LPAs to work together to deliver outcomes on strategic cross boundary planning issues, are relevant to the preparation of our Local Plans. This includes addressing unmet development needs in neighbouring (HMA) authorities, where reasonable to do so. Effectively, this obligation placed on LPAs under the statutory “duty to cooperate” is a replacement for the strategic planning framework formerly provided by sub-regional plans. Where Local Plans do not conform to national policy requirements, they are at significant risk of being found unsound.

3. Joint working in Hart, Rushmoor and Surrey Heath

3.1 In this context, Hart, Rushmoor and Surrey Heath Councils are working jointly to deliver outcomes on strategic planning matters, including the provision of housing, as required by national planning policy. As noted in paragraph 1.1 of this report, as required by the Duty to Cooperate, the Councils have together prepared a joint Strategic Housing Market Assessment, published in 2014. The process for commissioning and preparing this Assessment has been managed through the establishment of a Joint Member Liaison Group. The Terms of Reference (ToR) for this Group include some specific objectives:

- i. To reach an informal agreement between the three authorities on what the objectively assessed housing need is across the HMA, and within each authority area, over relevant time periods;*
- ii. To informally agree whether each authority is doing all it reasonably can, consistent with policies in the NPPF and other material considerations, to meet the objectively assessed housing needs for its area;*
- iii. That in the event of any housing shortfalls arising in one authority area, to explore how cross boundary working can help address those shortfalls*

3.2 One of the specific outcomes set out in the Terms of Reference is to arrive at a position:

- Where all three authorities are satisfied that each one is doing all it reasonably can to meet its own housing needs, and that any shortfalls in one area are addressed as far as possible through joint working, so that across the HMA as a whole, needs are met as far as possible, consistent with policies in the NPPF.*

3.3 Recently, the Councils have together commissioned an update to the Strategic Housing Market Assessment, to take into account newer data on population projections and employment forecasts. This update is scheduled for completion in spring 2016. This is expected to provide a refreshed figure for housing **need**, against which the three HMA authorities will need to revisit potential sources of housing **supply**. This may result in a change to the net difference between need and supply (i.e. the unmet housing need) in all three HMA authorities.

3.4 Alongside this, mindful of the close links between housing and employment, the joint Employment Land Review of June 2015 is also being updated, and will be available alongside the revised SHMA. This way, the important linkages between protecting and providing land for both housing and employment can be planned for in the three authorities' new Local Plans.

4. What is the position in Rushmoor?

4.1 The SHMA 2014 identifies an “Objectively Assessed Housing Need” of 1,180 new homes a year across the Housing Market Area of Hart, Rushmoor and Surrey Heath. Of these, approximately 470 homes a year are required in Rushmoor. This equates to a **need** for a total of 9,822 new homes in the Borough between 2011 and 2032.

4.2 It is in this context that Rushmoor published its [Preferred Approach Local Plan](#) for consultation in June 2015. The contextual evidence that supports the spatial strategy, as set out in Preferred Approach Policy SP2, explains that the potential **supply** of additional houses in Rushmoor Borough over the period to 2032 is around 8,200 units. This figure is based on:

- Completions since 2011
- Supply arising from the development of Wellesley
- Other sites within urban areas identified as potentially coming forward for housing
- An allowance for small sites, the exact location of which it is not possible to predict

4.3 The difference between **need** (9,822) for new homes identified in the SHMA and the potential **supply** (8,200) leaves a shortfall of approximately **1,600** new homes in Rushmoor by 2032. Further explanation is set out in Rushmoor’s [Housing Delivery Topic Paper](#), June 2015. Of note is that paragraph 9.19 of the Topic Paper states that;

“Through the Joint Member Liaison Group and also in response to Hart’s Housing Development Options paper [see the Cabinet report 7th October 2014], the Council has made Hart and Surrey Heath aware of its potential shortfall of about 1,600 dwellings against identified housing need, and discussions are ongoing as to how and if this shortfall can be met.”

4.4 In response to the Preferred Approach Local Plan consultation, Rushmoor received a number of objections relating to the potential that any housing shortfall in Rushmoor’s administrative boundary be redressed through additional new homes over and above that initially indicated for Hart District in the SHMA, 2014 (see [consultation response summary document](#)).

4.5 Rushmoor will be publishing the next version of its Local Plan for consultation once the refreshed SHMA and Employment Land Review have been finalised, to enable this evidence to inform the evolution of the spatial strategy in the Plan. Further information on the timetable for the preparation of the new Rushmoor Local Plan can be found at www.rushmoor.gov.uk/lds.

5. Hart Local Plan: Draft Vision and Strategic Priorities

5.1 Mindful of this context, Rushmoor has considered the contents of the Hart Local Plan [Draft Vision and Strategic Priorities](#). Key Issue 1 identified for the Hart Local Plan is;

“The need to make provision for the new homes needed in the area”

5.2 Table 2 sets out the Draft Strategic Priorities for the Local Plan.

- Priority 1 seeks; *“to deliver all the objectively assessed housing need for **Hart**” (emphasis added).*
- Priority 2 is; *“to continue to work with Rushmoor and Surrey Heath on meeting the objectively assessed housing need for the Housing Market Area as a whole, for example through the provision of SANG that can facilitate housing in those areas. In order to comply with statutory requirements, when it is clear what (if any) the level of unmet need is across the housing market area, **we will seek to help meet this in a way that fits into our strategy.**” (emphasis added).*
- Priority 3 seeks; *“to provide new homes of a mix of sizes and tenures to meet the current and future needs of **Hart’s** residents.” (emphasis added)*

5.3 In response to Key Issue 1, and Priorities 1, 2 and 3, Rushmoor Borough Council welcomes Hart’s commitment to work with Rushmoor (and Surrey Heath) Councils on meeting the objectively assessed housing need for the HMA as a whole. This is particularly important, mindful of the specific outcome in the agreed terms of reference of the Joint Member Liaison Group whereby, **“any shortfalls in one area are addressed as far as possible through joint working, so that across the HMA as a whole, needs are met as far as possible.”**

5.4 Priority 4 seeks to support economic growth by;

“Protecting and providing a range of size and types of employment land and buildings...to meet future needs and to contribute to economic growth in Hart and the wider area.”

5.5 Rushmoor Borough Council welcomes this priority, and seeks reassurance from Hart that its Local Plan will contain a clear strategy for protecting existing employment sites where they are important to the future supply of such land, particularly mindful of the fact that Hart, Rushmoor and Surrey Heath Councils together form a Functional Economic Area.

5.6 Reassurance is also sought that an appropriate balance will be struck between the need to identify land for new homes and the need to protect an adequate supply of employment land to support economic growth over the Plan period, to be determined through the refresh of the joint Employment Land Review. This is all the more important in the context of the Devolution Bid for Hampshire and the Isle of Wight, at the heart of which is a future Local Government funding structure reliant on the 100% retention of business rates. It is expected that this reassurance will be provided once Hart publishes a complete draft version of its Local Plan for consultation in the summer of

2016, wherein the overall spatial strategy for delivering new homes and ensuring an appropriate supply of employment land will be set out.

- 5.7 Priority 5 refers to the need; *“to ensure that transport, social and physical infrastructure required to support new development is delivered in a timely and coordinated manner.”* Rushmoor Borough Council suggests that this priority could be strengthened through additional wording to refer to partnership working with the highway authority (Hampshire County Council) to plan for appropriate transport infrastructure (as per the current reference in this priority to the education authority).

6. Hart Local Plan: Refined Options for Delivering New Homes

- 6.1 The [Refined Options for Delivering New Homes](#) focuses on the strategy for delivering new homes in Hart District. Mindful of the national planning policy context, and the evidence base, both of which are discussed above in this report, the consultation document contains a section headed; **“Helping to meet possible Rushmoor or Surrey Heath unmet need for new homes”**. Within this, paragraph 24 of the consultation document notes that;

“We have scrutinised Rushmoor’s draft Local Plan and have raised an objection to the scale of the shortfall. We think that Rushmoor can do much more to meet its need for new homes.”

- 6.2 Paragraph 26 goes on to state that;

“It is still too early to draw any conclusions, but there is a strong likelihood that under Government rules Hart may be legally obliged to take up some of this unmet need for new homes.”

- 6.3 At paragraph 27, the consultation document sets out that;

“We think that the way forward is for Hart to plan for our own housing needs, but to review the Hart Local Plan nearer the time that any shortfall from elsewhere in the housing market area has been confirmed. In the meantime, however, our Local Plan would still need to show that there are deliverable options to draw on, should they be needed.”

- 6.4 In response, Rushmoor Borough Council acknowledges the points raised by Hart in the consultation document, and welcomes the recognition by Hart that it may be legally obliged to accommodate some of the unmet housing need. In terms of the scale of the shortfall, Rushmoor is absolutely committed to maximising the delivery of new homes on land within its administrative area, and to that end, will be refreshing its Strategic Housing Land Availability Assessment (SHLAA) in early 2016. It is helpful in this context that Hart, Rushmoor and Surrey Heath Councils have all agreed to use a consistent methodology for updating their respective SHLAAs, and to that end, Hart is welcome to work with Rushmoor in looking at potential sites in the Borough that may be able to contribute to future housing delivery.

6.5 In response to Hart’s assertion that, “*We think that Rushmoor can do much more to meet its need for new homes*”, Rushmoor reiterates that the Borough is a tightly drawn urban area, with the limited land outside settlements already subject to nature conservation constraints or operating as Army training land. There are no opportunities for allocating significant additional land for new homes; the Wellesley development on surplus Army land already has planning permission to provide up to 3,850 new homes over the Plan period. Of relevance, the Hart consultation document states that;

“In our view, we must avoid the mistakes of the past and not return to the days of “town cramming” where the only emphasis was on delivering large number of homes at the highest possible density irrespective of where it is.”

6.6 It is important to recognise that this applies equally to Rushmoor; good planning achieves development that is sustainable within the overall policy framework provided by the NPPF, and this includes good design.

6.7 The updated Rushmoor SHLAA will be used to inform potential **supply** calculations to be incorporated into the next version of the Rushmoor Local Plan. However, until **need** arising from the update to the joint SHMA is clarified, it is not possible to determine the most up to date figure for the difference between need and supply, i.e. the potential shortfall in housing supply in Rushmoor over the plan period to 2032. In this context, the consultation on the Hart housing options reflects the current evidence base, and only once the new SHMA is finalised will all three housing market area partners be more certain as to the scale of unmet need in the HMA as a whole.

6.8 To this end, Rushmoor looks forward to continuing to work with Hart to ensure that the Authorities’ respective emerging Local Plans together help to meet housing need across the Housing Market Area, as required by paragraph 179 of the NPPF¹, and reflected in the ToR of the joint Member Liaison Group.

6.9 This is all the more important, mindful of the Hampshire and Isle of Wight Devolution Prospectus, September 2015, to which all component local authorities (including Hart) have signed up. This includes a commitment to accelerate and increase housing delivery throughout Hampshire, over and above that committed in Local Plans.

Feedback on proposed housing options

6.10 In the context of the issues discussed in earlier sections of this report to Cabinet, Rushmoor welcomes the opportunity to continue to work with Hart

¹ Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity

District Council, as one of its Housing Market Area partners, on the delivery of new homes in the Borough.

6.11 The Refined Options for Housing document demonstrates that there a number of options available to Hart to help meet the housing needs of the HMA, including any unmet need from its HMA partners. Rushmoor Borough Council supports the strategy of prioritising development on brownfield land, and on land outside the zone of influence for the Thames Basin Heaths Special Protection Area. Rushmoor expects that in addition to this, the first full consultation version of the Hart Local Plan will be based on a strategy to meet housing needs that requires a combination of the options set out in in the consultation paper. This will include dispersed development, strategic urban extensions and a new settlement at Winchfield in order to help deliver the housing need identified in the SHMA.

6.12 Paragraph 27 of the consultation document states;

“We think that the way forward is for Hart to plan for our own housing needs, but to review the Hart Local Plan nearer the time that any shortfall from elsewhere in the housing market area has been confirmed. In the meantime, however, our Local Plan would still need to show that there are deliverable options to draw on, should they be needed. For example, strategic land releases, accelerated delivery of a possible new settlement, or simply selecting additional sites.”

6.13 At this stage in the plan preparation process, Rushmoor Borough Council considers that the most appropriate strategy and timescale for meeting housing need across the HMA can only be identified once the update to the evidence base is in place. Moreover, until the implications of the conclusions in the updated evidence base are understood, it is not possible to comment on the detail of the housing options in isolation from other strategic cross boundary issues. Key to this, the spatial strategy that will be set out in the Hart Draft Local Plan will need to reflect an appropriate balance between new homes and employment growth in the HMA and FEA over the Plan period to 2032, to help meet the future housing and economic growth needs of north-east Hampshire.

7. Conclusions

7.1 Rushmoor Borough Council welcomes the opportunity to work with Hart District Council on developing a planning strategy to meet the housing needs of the HMA, within the HMA, in accordance with national planning policy, and the Terms of Reference of the Joint Member Liaison Group. It will continue to work with Hart and Surrey Heath Councils to ensure a timely update to the joint evidence base, to enable the three authorities to demonstrate positive outcomes through Plan making, as required by the Duty to Co-operate, and reflected in the tests of soundness at Examination of Local Plans.

8. Recommendations

8.1 It is recommended that Cabinet:

- i) Endorse the contents of this Cabinet report as Rushmoor's response to the;**
 - Hart Refined Options for Strategic New Homes Growth and Site Allocations and**
 - Draft Local Plan Vision and Strategic Priorities**

Keith Holland

Head of Planning

Contacts:

Keith Holland	01252 398790	keith.holland@rushmoor.gov.uk
Louise Piper	01252 398410	louise.piper@rushmoor.gov.uk