

CABINET

**COUNCILLOR MARTIN TENNANT
ENVIRONMENT AND SERVICE DELIVERY
PORTFOLIO HOLDER**

30 MAY 2017

REPORT NO. PLN1713

KEY DECISION: NO

DRAFT HART LOCAL PLAN: STRATEGY AND SITES 2011 – 2032

SUMMARY AND RECOMMENDATIONS:

This report seeks Cabinet approval for comments to be submitted in response to the Draft Hart Local Plan: Strategy and Sites document, 2011 – 2032.

1. INTRODUCTION

- 1.1 Hart District Council is preparing a new Local Plan to guide the scale, type and location of future land uses in its Borough. It is important that, as neighbouring authorities, Hart and Rushmoor Councils work together to meet strategic development needs, in particular relating to housing and employment, and to deal with the cross boundary impacts of new development proposed in their respective authorities.

2. BACKGROUND

- 2.1 Work has been underway on the preparation of a new Hart Local Plan for several years. As required by the National Planning Policy Framework (NPPF), local authorities must work together to ensure that Local Plans are based on co-operation with neighbouring authorities, particularly on meeting cross boundary strategic priorities. The NPPF notes that local planning authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring local authorities where housing market areas cross administrative boundaries. In addition, it requires local planning authorities to have a clear understanding of business needs within the economic markets operating in and across their area.
- 2.2 Refreshed evidence has demonstrated that Hart, Rushmoor and Surrey Heath Councils together comprise a “Housing Market Area” (HMA) and a “Functional Economic Market Area” (FEMA). This corroborates a tradition of joint working between the three local planning authorities. It has led to the formation of a “Joint Member Liaison Group”, with representatives from

all three authorities, to oversee work on the shared evidence base relating to housing and employment.

- 2.3 The most recent iterations of the joint evidence base are the Strategic Housing Market Assessment (2016), the Employment Land Review (2016), the Retail and Leisure Study (2015) and the Water Cycle Study (2017)¹. These documents, prepared jointly between Hart, Rushmoor and Surrey Heath Councils, have all been used to inform the respective emerging development plans of each planning authority.
- 2.4 Given the cross boundary nature of the joint evidence base, and the shared responsibility for delivering development needs as required by national planning policy, it is important for Rushmoor to respond to the emerging Hart Local Plan.

3. DETAILS OF THE PROPOSAL

- 3.1 The Draft Hart Local Plan: Strategy and Sites document sets out the long-term framework to guide future development in the Borough up to 2032. It is to be supplemented in due course by a second part of the Local Plan dealing with detailed development management policies. It includes a Vision of how the Borough might look in 2032 on the implementation of the policies in the Plan, and sets out a framework for how much development will take place, where it will be, and when it might be delivered.

Housing matters

- 3.2 The obligation set out in the National Planning Policy Framework is that local authorities should establish housing need across the HMA, and ensure that the component Local Plans together use all reasonable endeavours to meet that “objectively assessed” need within the HMA boundary. The SHMA 2016 identifies that total housing need across the HMA is 1,200 new dwellings per year over the Plan period, and of that, Hart’s objectively assessed housing need (OAHN) is 382 dwellings per year, equivalent to 8,022 new dwellings over the period 2011 – 2032.
- 3.3 The Draft Hart Local Plan makes provision for 10,185 new homes over the period 2011 – 2032, thereby exceeding Hart’s share of the HMA’s OAHN by a little over 2,000 new homes over the Plan period. It notes at paragraph 95 that the additional dwellings over and above the OAHN for Hart are based on;

“...a separate policy decision to include an additional uplift to help us [Hart] meet our priority need for subsidised affordable rental homes.”

- 3.4 Relevant to this issue, the joint SHMA states at paragraph 10.14 that;

“Whilst subsequent analysis would appear to show that Rushmoor exhibits higher levels of need for affordable rented housing, this is driven, in part,

¹ These documents can be viewed at www.rushmoor.gov.uk/newlocalplan

by the larger stock of rented housing in the authority area. The majority of housing need is generated by households in rented accommodation, so areas with a larger stock of affordable and privately rented housing, such as Rushmoor, tend to generate higher number of households in need. It would be an acceptable solution to provide for some of this housing need in other parts of the HMA.”

- 3.5 With regard to Rushmoor’s ability to meet its share of the HMA’s housing need, the update to the Strategic Housing and Employment Land Availability Assessment (SHELAA) has determined that there is adequate capacity to accommodate this, with a small surplus of around 850 units over the Plan period (8,700 new homes in total). This is sufficient to allow some flexibility should some sites for any reason not be delivered as anticipated, and to help maximise opportunities for affordable housing delivery. However, given the tight urban nature of Rushmoor, and the fact that much of the land outside the settlement boundary is subject to nature conservation designations or is in military ownership, there is no opportunity to increase housing delivery beyond this level to assist the HMA partners with meeting any unmet need.
- 3.6 Notwithstanding this, the policy decision to uplift Hart’s housing target to address the pressing need for affordable rented properties is supported. This support is appropriate, given that the SHMA sets out that the affordable housing need identified should be considered a collective need across the HMA and it could be met anywhere within the HMA. On this basis, Rushmoor would welcome Hart’s recognition within the Draft Local Plan and Affordable Housing Background Paper of the HMA-wide role of affordable housing delivery. Furthermore, Rushmoor advocates that all mechanisms for maximising the delivery of affordable housing within the HMA be explored through continued working under the Duty to Cooperate.
- 3.7 In respect of the approach to working together to optimise the delivery of new homes in the HMA, work is currently underway to prepare a Memorandum of Understanding between the three authorities to reflect our respective positions on meeting housing need. Importantly, this will assist with demonstrating at Examination that we have worked together to deliver positive outcomes on housing as part of the requirements of the Duty to Cooperate.
- 3.8 The scale and distribution of housing growth in Hart District is articulated through Policy SS1: Spatial Strategy, and this draft policy is therefore supported for the reasons set out above.
- 3.9 In terms of detailed site allocations, those most relevant to Rushmoor Borough are the allocations for new residential development on brownfield land at Hartland Village (the former Pyestock site) for 1,500 new homes, and at Sun Park (the remainder of the former Sun Microsystems site) for 320 new homes. Draft Policy MG3: Housing-led strategic sites, allocates strategic sites to meet development needs for new homes. Criterion a) refers to the allocation of Hartland Village for residential development, and criterion d) refers to the allocation of Sun Park. In terms of general

principles applying to the redevelopment of the sites listed in Policy MG3, of note is that proposals must ensure that infrastructure is provided to support the developments.

- 3.10 Draft Policy MG3 is supported in as much as the principle of the re-use of both Hartland Village and Sun Park for residential development is acceptable. The policy requires that appropriate supporting infrastructure is delivered alongside these schemes. Given the proximity of these allocations to Rushmoor's boundary, the importance of delivering adequate infrastructure such as school places, access to healthcare services, open space, and on and off-site transport measures as part of the implementation of these proposals is critical. Detailed policies and development principles relating to these allocations are set out in Policy SC1: Hartland Village, and Policy SC4: Sun Park, and these policies are supported. Policy I1: Infrastructure is relevant in as much as it supplements these policies by stating that; "*All development that requires planning permission must make appropriate provision for infrastructure, on and off-site, or through financial contributions to off-site provision*". Policy I1 is therefore supported.
- 3.11 In considering planning applications for these allocations, the absence of such supporting infrastructure would be contrary to adopted and emerging policies, and would cause concern to Rushmoor Borough Council in terms of potential impacts on its existing residents. It should be noted that Rushmoor has been consulted on residential-led planning applications for Hartland Village² and Sun Microsystems³, and has submitted comments setting out the Council's views on the proposals.
- 3.12 Draft Policy SC6 deals with the mix of market housing, Policy SC7 with Self and Custom Build Homes, and Policy SC8 with Affordable Housing. The approach set out in these draft policies aligns with the findings of the joint evidence base, and complements for the most part the policy approaches set out in the Draft Submission Rushmoor Local Plan⁴, and the Council therefore supports these draft Policies.

Employment Land

- 3.13 In respect of employment land, the NPPF states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The updated joint Employment Land Review 2016 has provided the evidence for the three Functional Economic Market Area Councils to be clear on their strategies for protecting Strategic and Locally Important Employment Sites, whilst releasing those that are not critical to the future economic growth of the Borough or the wider FEMA. This balances the

² Planning application reference 17/00471/OUT available to view at: <http://publicaccess.hart.gov.uk/online-applications/>

³ Planning application reference 17/00771/FUL available to view at: <http://publicaccess.hart.gov.uk/online-applications/>

⁴ As set out in the Draft Submission Rushmoor Local Plan available to view at: <http://www.rushmoor.gov.uk/article/9019/Cabinet-meeting---4-April-2017>

role of the three local authorities in continuing to support the economic well-being of the Enterprise M3 Local Economic Partnership area with meeting housing needs as identified in the SHMA.

- 3.14 The Draft Hart Local Plan sets out emerging policies to protect Strategic and Locally Important Employment Sites, applying the same policy approach as the Draft Submission Rushmoor Local Plan. This is based on the findings of the joint ELR 2016, the calculations in which assume the removal of Hartland Village and Sun Park from any future employment land supply. In this context, the ELR 2016 highlights that; “...*the quantum of land for development for B-class uses⁵ has been significantly reduced relative to the 2015 ELR*” and that “...*the exclusion of Hartland Park has roughly halved the availability of employment land in the FEA.*” (page 7, paragraph 14).
- 3.15 Overall, the approach to protecting employment land in the Draft Hart Local Plan, as framed by emerging Policies ED1: New Employment and ED2: Safeguarding Employment Land and Premises, is supported. However, it is important to note that the strategy for the protection of B-class employment land in the Draft Submission Rushmoor Local Plan⁶ is complementary to the FEMA-wide approach to protecting employment land. Hence, in order to ensure an adequate supply of future B-class employment land and premises to meet the future economic growth needs of the FEMA and the wider Enterprise M3 LEP area, Rushmoor is protecting its Strategic and Locally Important Employment Sites as set out in the Draft Submission Rushmoor Local Plan. To this end, Rushmoor would welcome support from Hart Council for this approach as part of our forthcoming Local Plan consultation⁷.

Thames Basin Heaths Special Protection Area and Suitable Alternative Natural Greenspace

- 3.16 Policy NE1: Thames Basin Heaths SPA, sets out the approach to mitigating the impact of net new development on the SPA. This policy aligns with Rushmoor’s policy approach, and hence, Rushmoor Borough Council supports draft Policy NE1.
- 3.17 Policy I8: Strategic SANG, allocates land as Suitable Alternative Natural Greenspace (SANG) as part of the avoidance and mitigation measures required in relation to the SPA. The supporting text notes that; “*Where there is spare capacity (i.e. where the SANG is larger than is needed to mitigate the associated development) the spare capacity will serve to mitigate other residential developments elsewhere*” (paragraph 433).

⁵ Uses that fall within Classes B1, B2 and B8 of the Town and Country Planning (Use Classes) (Amendment) (England) Order 2006

⁶ Available to view on-line at: <http://www.rushmoor.gov.uk/article/9019/Cabinet-meeting---4-April-2017>

⁷ Consultation on the Draft Submission Rushmoor Local Plan is scheduled to run from 9th June 2017 to 21st July 2017, inclusive.

- 3.18 The delivery of Rushmoor's share of the HMA's objectively assessed housing need⁸ is dependent on the identification and implementation of sufficient land to mitigate the potential recreational impact of net new dwellings on the Thames Basin Heaths Special Protection Area. The Council is making every effort to identify and facilitate Suitable Alternative Natural Greenspace (SANG), and given the tight urban nature of the Borough, continues to work in partnership with neighbouring authorities to identify new opportunities for SANG. To this end, Hart and Rushmoor Councils are working together to draw up a "Memorandum of Understanding" to formalise joint arrangements to enable strategic SANG in Hart District to help mitigate net new residential development in Rushmoor Borough.
- 3.19 In this context, Rushmoor Borough Council supports draft Policy I8. It welcomes the acknowledgement that the "spare" strategic SANG capacity in Hart District will "...serve to mitigate other residential developments elsewhere." However, RBC would welcome clarification in the supporting text that Hart will assist Rushmoor with the provision of SANG mitigation in order to help facilitate the full delivery of Rushmoor's share of the HMA's housing need. Rushmoor Borough Council looks forward to continuing to work in partnership with Hart District Council on the implementation and sharing of strategic SANG resources.

Natural Environment (other)

- 3.20 Draft Policy MG6: Gaps between Settlements, sets out the principle of ensuring that appropriate separation remains between settlements. It notes that development would only be supported in such locations where it would not diminish the physical and/or visual separation of settlements and would not compromise the integrity of the Gap. It identifies Gaps between Hawley and Farnborough, and Fleet and Farnborough. Detailed boundaries are to be established in Part 2 of the Hart Local Plan. The principle of the identification of Gaps in these locations is supported by Rushmoor Borough Council.

Town and District Centres

- 3.21 Draft Policy SS1 sets the spatial strategy for the delivery of approximately 4,000 square metres of comparison retail floorspace and 6,000 square metres of convenience floorspace, focused on Fleet Town Centre. This reflects evidence of need for gross floorspace. Draft Policy ED4 sets out the approach to maintaining the vitality and viability of the hierarchy of town, district and local centres in Hart District. This approach aligns with the findings of the joint evidence base, and complements the approach in the Draft Submission Rushmoor Local Plan⁹. The Council therefore supports draft Policy ED4.

⁸ As set out in the Draft Submission Rushmoor Local Plan available to view at: <http://www.rushmoor.gov.uk/article/9019/Cabinet-meeting---4-April-2017>

⁹ As set out in the Draft Submission Rushmoor Local Plan available to view at: <http://www.rushmoor.gov.uk/article/9019/Cabinet-meeting---4-April-2017>

Transport

- 3.22 Draft Policy I3: Transport, sets out the approach to mitigating the impact of net new development in transport terms. It recognises the role that Hampshire County Council plays as Highway Authority, and sets out a policy approach to assessing and managing transport impacts. Rushmoor looks forward to continuing to work with Hart District Council as its transport evidence base evolves, in order to continue to understand and mitigate appropriately any transport impacts arising in Rushmoor Borough as a result of net new development in Hart District. Draft Policy I3 complements the policy approach in the Draft Submission Rushmoor Local Plan, and is therefore supported by the Council.

Gypsies, Travellers and Travelling Showpeople

- 3.23 Draft Policy SC11: Gypsies, Travellers and Travelling Showpeople, protects existing sites for travellers, and sets out criteria to determine the suitability of proposals for new sites. The supporting text explains that the update to Hart's Gypsy and Traveller Accommodation Assessment shows that there is currently no need to make any additional pitch provision for Gypsies and Travellers or plots for Travelling Showpeople in Hart District, nor that there is any proven need for transit provision at this time.
- 3.24 The supporting text goes on to note that Hart Council will continue to work collaboratively with neighbouring local authorities to understand the accommodation needs of gypsies, travellers and travelling showpeople. In this context, Rushmoor supports the draft Policy SC11 as set out in the emerging Local Plan.

Alternative Options

- 3.25 Rushmoor Council could choose not to respond to the Draft Hart Local Plan Strategy and Sites consultation. However, given the nature of the cross boundary strategic work that has taken place between Hart and Rushmoor in connection with plan making, it would be inappropriate not to submit a response to the consultation.

4. IMPLICATIONS OF DECISION

Legal Implications

- 4.2 One of the tests of soundness at an Examination of a Local Plan is that the plan has met the legal duty to cooperate on cross boundary strategic issues. It is therefore important that authorities with cross boundary strategic planning issues work together to offer positive outcomes for those planning issues. Hart and Rushmoor Councils will need to continue to work together during their respective Plan preparation processes to enable the delivery of sound Local Plans for both planning authorities.

Financial and Resource Implications

- 4.3 The financial implications associated with the preparation of Local Plans relate primarily to the preparation of the evidence base, which is required to justify the strategy contained in the Local Plan. The fact that joint work has taken place with Hart and Surrey Heath Councils has shared three way the financial costs of the preparation of elements of the evidence base. There are no exceptional resource implications in responding to the Hart Local Plan consultation.

Equalities Impact Implications

- 4.4 It is for Hart District Council to determine the equalities implications of the emerging Hart Local Plan.

5. CONCLUSIONS

- 5.1 The preparation and adoption of a new Local Plan for Hart, as one of Rushmoor's Housing Market and Functional Economic Market Area partners, is important in particular to show the delivery of Hart's contribution to the HMA's housing needs and FEMA's employment needs. To this end, Rushmoor Borough Council is supportive of the overall spatial strategy set out in the Strategy and Sites document, subject to the detailed comments set out in earlier sections of this report.

6. NEXT STEPS

- 6.1 The comments that Hart District Council receives during this consultation will be used to inform the next iteration of the Hart Local Plan (known as the "Draft Submission" version). There will be an opportunity to comment on the Strategy and Sites contained in that version during a further statutory six-week consultation period, currently anticipated in Winter 2017.

7. Recommendations

- 7.1 **It is recommended that the comments raised in this report be submitted to Hart District Council as Rushmoor's response to the Draft Hart Local Plan: Strategy and Sites document.**

BACKGROUND DOCUMENTS:

A number of background documents have informed the preparation of the Draft Hart Local Plan: Strategy and Sites document. They can be viewed via this web link: <https://www.hart.gov.uk/draft-local-plan>

CONTACT DETAILS:

Report Author – Louise Piper/louise.piper@rushmoor.gov.uk/01252 398410

Head of Service – Keith Holland/keith.holland@rushmoor.gov.uk/01252 398790