

24 JULY 2018

REPORT NO. PLN1817

KEY DECISION? NO

**SURREY HEATH DRAFT LOCAL PLAN ISSUES AND OPTIONS/
PREFERRED OPTIONS CONSULTATION**

SUMMARY AND RECOMMENDATIONS:

This report seeks Cabinet approval for comments to be submitted in response to the Surrey Heath Draft Local Plan Issues and Options/Preferred Options consultation.

It is recommended that the proposed response attached to this report be submitted to Surrey Heath Borough Council as Rushmoor's response to the Surrey Heath Draft Local Plan Issues and Options/Preferred Options consultation.

1. INTRODUCTION

1.1 Surrey Heath Borough 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, Surrey Heath 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 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.

2.2 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 A Statement of Common Ground was agreed on 24th January 2018 between Rushmoor Borough Council, Hart District Council and Surrey Heath Borough Council on the strategic matters of housing, economy and

the mitigation of impacts of development on the Thames Basin Heaths Special Protection Area.

3. DETAILS OF THE PROPOSAL

General

- 3.1 Surrey Heath Borough Council is inviting comments on the Issues and Options/Preferred Options version of the Surrey Heath Local Plan. This is the first stage in the preparation of the Local Plan. It sets out the Council's preferred approach to addressing the development needs of the Borough, covering housing, employment, retail, infrastructure, Green Belt and countryside, heritage and design and local area policies, along with possible alternative approaches.
- 3.2 The comments that Surrey Heath Borough Council receives during this consultation will be used to inform the next iteration of the Surrey Heath Local Plan (known as the "Draft Submission" version). There will be an opportunity to comment on that version during a further statutory six-week consultation period, currently anticipated in June 2019.
- 3.3 Surrey Heath Borough Council forms a Housing Market Area (HMA) with Hart District and Rushmoor Borough Councils. The obligation set out in the published National Planning Policy Framework (NPPF) 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.
- 3.4 The Draft Local Plan calculates the housing need over the plan period as 5,632 dwellings. Of these, it identifies that 4,901 dwellings can be delivered in Surrey Heath. This results in a potential unmet need over the plan period of 731 dwellings.
- 3.5 Alongside the Draft Local Plan, Surrey Heath have published an Interim Capacity Study (April 2018) which details the work undertaken to date to establish the extent to which the emerging Local Plan can meet its housing needs, in addition to setting out the key environmental and policy constraints to housing delivery that affect the Borough. The Paper also sets out the steps that Surrey Heath will undertake during the remainder of the plan making process to minimise unmet housing need and Surrey Heath's approach to addressing any residual unmet housing need.
- 3.6 Officers support the statement made in the Interim Capacity Study (April 2018) regarding the joint working within the HMA:
"A commitment to joint working between Hart and Rushmoor has been enshrined in the Statement of Common Ground recently completed between the three authorities to underpin the Rushmoor Local Plan. This recognises that in the event that Surrey Heath has demonstrated that it is unable to eliminate any remaining shortfall, and the Housing Market Area partners are satisfied that Surrey Heath has taken all reasonable steps to meet its own share of the housing need, the three authorities will work

together to ensure that the shortfall is addressed elsewhere within the HMA.”

- 3.7 The draft response sets out that Rushmoor Borough Council agree that the principle of working together to address demonstrated unmet need is well established. However, at this stage, there has been no formal agreement on the amount of unmet need and/or specifically how the HMA will ensure this unmet need is addressed. Before this agreement can take place, in accordance with the Hart Rushmoor and Surrey Heath Joint Member Liaison Group Terms of Reference, Hart and Rushmoor will need to be satisfied that Surrey Heath 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.
- 3.8 The proposed response raises some concerns about the approach taken to identify potential capacity, to date, and encourages Surrey Heath to continue to work proactively to address this unmet need within the Borough, before further discussions take place on meeting unmet need elsewhere in the HMA. This includes a request to undertake a number of actions to inform the next stage of the Local Plan.
- 3.9 The proposed response is attached as a background document to this report.

Alternative Options

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

Consultation

- 3.11 This is a proposed response to a consultation from Surrey Heath Borough Council. The report was identified on the Cabinet Work Programme.

4. IMPLICATIONS (of proposed course of action)

Risks

- 4.1 None

Legal Implications

- 4.2 The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is positively prepared, justified, effective and consistent with National Policy.

- 4.3 It is therefore important that authorities with cross boundary strategic planning issues work together to offer positive outcomes for those planning issues. Surrey Heath and Rushmoor Councils will need to continue to work together 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 the financial costs of the preparation of elements of the evidence base. There are no exceptional resource implications in responding to the Surrey Heath Local Plan consultation.

Equalities Impact Implications

- 4.4 It is for Surrey Heath Borough Council to determine the equalities implications of the emerging Surrey Heath Local Plan.

5. CONCLUSIONS

- 5.1 The preparation and adoption of a new Local Plan for Surrey Heath, as one of Rushmoor's Housing Market and Functional Economic Market Area partners, is important in particular to ensure the delivery of Surrey Heath's contribution to the HMA's housing needs and FEMA's employment needs.
- 5.2 The proposed response is supportive of the progress Surrey Heath are making towards preparing a new Local Plan. However, given the potential for unmet need, it encourages Surrey Heath to continue to be proactive in exploring the potential opportunities to increase capacity for housing and to continue to work proactively to address this unmet need within the Borough.

BACKGROUND DOCUMENTS:

Proposed response to the Surrey Heath Draft Local Plan Issues and Options/
Preferred Options consultation

A number of background documents have informed the preparation of the Surrey Heath Draft Local Plan. They can be viewed via this web link:

<https://www.surreyheath.gov.uk/draftlocalplan>

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Proposed Response to the Surrey Heath Draft Local Plan Issues and Options/ Preferred Options consultation

Background

1. Surrey Heath Borough Council forms a Housing Market Area (HMA) with Hart District and Rushmoor Borough Councils. The obligation set out in the published National Planning Policy Framework (NPPF) 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.
2. The Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment 2016 identifies that total housing need across the HMA is 1,200 new dwellings per year over the Plan period, and of that, Surrey Heath’s objectively assessed housing need (OAHN) is 382 dwellings per year, equivalent to 8,022 new dwellings over the period 2014 – 2032.
3. In September 2017, the Government published a consultation on Planning for the right homes in the right places. This consultation paper arises from matters raised in the Housing White Paper, published earlier in 2017. Proposals set out in this consultation included a standard methodology for calculating local authorities’ housing need. The consultation paper was accompanied by a summary of housing need for each local authority, based on the proposed methodology. This published a figure of 352 dwellings per annum for Surrey Heath (from 2016).
4. On 5 March 2018, the Government published a consultation on the draft revised NPPF. This carries forward the standard methodology for calculating local authorities’ housing need. The latest timetable indicates that the Surrey Heath Local Plan will be submitted in September 2019. This is expected to be over a year after the publication of the NPPF and as such, it is envisaged that by September 2019, the policies within the new NPPF will apply. As a result, the housing requirement set out in the Surrey Heath Draft Local Plan (Regulation 18 Stage) has been prepared on the basis of the proposed standard methodology for calculating local authorities’ housing need.
5. The Draft Local Plan calculates the housing need over the plan period as 5,632 dwellings. Of these, it identifies that 4,901 dwellings can be delivered in Surrey Heath. This results in a potential unmet need over the plan period of 731 dwellings.
6. It is relevant to note that Rushmoor Borough Council submitted the Draft Submission Rushmoor Local Plan 2017 for examination to the Secretary of State on 2 February 2018. Alongside the Local Plan, Rushmoor has submitted a Duty to Cooperate Statement, which sets out how the two authorities have cooperated on relevant cross boundary issues and includes a Statement of Common Ground (SoCG) agreed on 24th January 2018 between Rushmoor Borough Council, Hart District Council and Surrey Heath Borough Council on the strategic matters of housing, economy and the mitigation of impacts of development on the Thames Basin Heaths Special Protection Area.

7. Following careful consideration, and in line with the proposed transitional arrangements set out in Planning for the Right Homes, Rushmoor decided to continue with submission of the current Local Plan, which is based on meeting objectively assessed need identified in the SHMA. The examination of the Rushmoor Local Plan is in progress, and the Inspector has made it clear that the Plan is being examined against the existing NPPF.
8. The ability of Rushmoor to accommodate growth is constrained by a number of factors and the limited scope for development outside the defined urban area. Due to this, Rushmoor had to be proactive in seeking to identify and maximise potential capacity for homes in the Borough wherever there was potential opportunity to do so. This included:
 - seeking to identify further available land within existing brownfield sites on which to deliver more homes and, where appropriate, increasing the density of development on these sites,
 - the deallocation, or partial deallocation, of employment sites and release for residential development,
 - the assessment of land outside of the Defined Urban Area and allocation of Blandford House and Malta Barracks for 165 homes.
9. It is important to note that Rushmoor has sought to identify sufficient capacity as a buffer in order to provide certainty that Rushmoor will meet the housing requirement over the plan period. Rushmoor has made it clear that this buffer is not available to meet any unmet need arising across the HMA.
10. In addition, at the point of submission, Rushmoor was not able to identify SANG capacity for the full capacity anticipated over the Plan period. In order, ensure that the potential residential development in the Local Plan can be delivered, additional SANG capacity has been identified at Blandford Woodlands and Southwood Golf Course. In relation to the latter, it should be noted that this is very much a “last resort” and that Rushmoor had no other option but to consider the closure of its municipal Golf Course to enable its conversion to SANG in order to meet its share of the identified housing need in the HMA.

Unmet Housing Need in the HMA

11. Rushmoor Borough Council supports the statement made in Surrey Heath’s Interim Capacity Study (April 2018) regarding the joint working within the HMA:

“A commitment to joint working between Hart and Rushmoor has been enshrined in the Statement of Common Ground recently completed between the three authorities to underpin the Rushmoor Local Plan. This recognises that in the event that Surrey Heath has demonstrated that it is unable to eliminate any remaining shortfall, and the Housing Market Area partners are satisfied that Surrey Heath has taken all reasonable steps to meet its own share of the housing need, the three authorities will work together to ensure that the shortfall is addressed elsewhere within the HMA.”

12. Therefore, Rushmoor considers that the principle of working together to address demonstrated unmet need is well established. However, Rushmoor is concerned that the specific references in the Draft Local Plan to unmet need being met across the HMA, and specific references to an amount, is premature. Apart from the agreement in principle (which acknowledges that there is potential capacity to meet unmet need within the HMA), there has been no formal agreement on the amount of unmet need and/or specifically how the HMA will ensure this unmet need is addressed at this stage.
13. Before this agreement can take place, in accordance with the HRSJ Joint Member Liaison Group Terms of Reference, Hart and Rushmoor will need to be satisfied that Surrey Heath 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. Therefore, Rushmoor would encourage Surrey Heath to continue to work proactively to address this unmet need within the Borough as it moves towards a Draft Submission version of its Local Plan, before further discussions take place on meeting unmet need elsewhere in the HMA.
14. Rushmoor agrees that it is important to note that Hart's Duty to Cooperate Paper (prepared to accompany the Hart Local Plan Proposed Submission Version consultation document) also reflects a commitment to address unmet housing needs within the HMA. However, the Interim Capacity Study goes on to set out how the housing need figures for all three authorities have decreased under the proposed standard methodology and the HMA as a whole is on track to exceed the indicative housing need figures as set out in the Government's consultation. Whilst this is factually correct, it is important to reiterate that the housing requirement in the Rushmoor Plan, currently being examined, is being assessed against the agreed OAHN set out in the published evidence (SHMA, 2016), as such this should not be considered as 'spare' capacity. The Borough is also heavily constrained and of a predominantly urban nature. Therefore, Rushmoor needs to give careful consideration of the ability to accommodate future growth and how future housing needs of the Borough will be addressed.
15. Rushmoor supports the statements regarding joint working made in paragraphs 5.6.5 and 5.6.7 of the Interim Capacity Study (April 2018). In particular, Rushmoor would welcome the opportunity at future meetings to discuss in detail the steps being taken to reduce unmet housing need as the Surrey Heath Local Plan progresses. As part of this process, if it is agreed that the unmet need cannot be fully addressed within Surrey Heath, this continued joint working will ensure that all parties agree that, firstly, it has been robustly demonstrated and, secondly, there is an agreed strategy for how it will be addressed within the HMA.
16. Rushmoor would request that Objective A is revised. It is not considered appropriate to include an objective that relates to housing delivery outside the Local Plan area, and it should refer to the amount of housing being delivered over the plan period within Surrey Heath. If, ultimately as part of the preparation of the Draft Submission version of the Surrey Heath Local Plan, it is agreed that this does not meet the full housing need for the Borough, then agreement relating to how unmet need will be addressed should be set out in a Statement

of Common Ground and be subject to future monitoring and review. It is also noted that a number of different terms are used within the Local Plan and supporting documents when reference is made to the housing figures. To avoid confusion, Rushmoor would request that there is a clear distinction made between housing need and the housing requirement.

Green Belt

17. It is noted in the Interim Capacity Study (April 2018, page 9) that over 44% of land within Surrey Heath is designated as Metropolitan Green Belt and “as such, the capacity of this area to accommodate residential development is considered to be significantly limited, without revision to existing Green Belt boundaries.”
18. In relation to the Green Belt, it is noted that reference is made to the paragraph 136 of the draft NPPF (2018) and how other alternatives, including asking Housing Market Area partners and other neighbouring authorities to take any remaining unmet need, should be considered in the first instance. However, it is considered relevant to make reference in full to paragraph 136:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy;

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

Assessment of Capacity

19. It is noted that the Interim Capacity Study (April 2018) details the work undertaken to date to establish the extent to which the emerging Local Plan can meet its housing needs, in addition to setting out the key environmental and policy constraints to housing delivery that affect the Borough. The Paper also sets out the steps that Surrey Heath will undertake during the remainder of the plan making process to minimise unmet housing need and Surrey Heath’s approach to addressing any residual unmet housing need.
20. Rushmoor has some concerns about the approach taken to identify potential capacity, to date. However, it is supportive of the commitments made in the Interim Capacity Study (April 2018) to further address the level of potential unmet need and welcomes the steps set out in Section 6, which will inform the

next iteration of the Local Plan. It is expected that this work will address some of the concerns raised below.

Spatial Strategy

21. Rushmoor has fundamental concerns about the approach taken to the SLAA (2017), whereby sites are assessed in accordance with the spatial strategy in the Core Strategy. The development of a new Local Plan should be an opportunity to reconsider this strategy, taking into account the latest evidence of identified housing need and other up to date evidence. Therefore, Rushmoor supports the following statement in the Interim Capacity Study (April 2018):

“In completing the next iteration of the SLAA, the Council will need to have consideration for the developing spatial strategy contained within the draft new Local Plan.”

22. Rushmoor is also concerned that there appears to be very limited testing of reasonable alternatives relating to quantum of development as part of the Sustainability Appraisal. It is recognised that what is considered ‘reasonable’ will be influenced by the characteristics and constraints affecting development in the Borough. However, as a minimum, it would seem reasonable for an option or option(s) where housing need is met within the Borough, to be tested through the Sustainability Appraisal process.

Availability of SANG

23. It is noted that in the Strategic Land Availability Assessment (SLAA) (2017), the ability to provide on-site SANG on large sites has been referred to as one of the reasons why a site is or could be unsuitable (e.g. Pine Ridge Golf Course and Land at Barossa Common). This is based on the principle set out in the Surrey Heath Thames Basin Heaths Special Protection Area Avoidance Strategy SPD (2012) that developments of more than 100 dwellings will generally be expected to provide on-site SANG.

24. The Thames Basin Heaths Delivery Framework (February 2009) notes that;

“...large residential development proposals which, due to their scale and potential impact and ability to offer their own alternative avoidance measures, should be considered by local authorities on a case-by-case basis. The numerical definition of ‘large development proposals’, and the ability of large schemes to provide their own avoidance measures, will vary depending on the particular locality of the proposals.”

25. In contrast, whilst paragraph 12.10 of the Rushmoor Local Plan Draft Submission expresses a preference for on-site SANG for “large” schemes, it does not preclude circumstances where bespoke SANG is not provided as part of a large site. The Rushmoor Avoidance and Mitigation Strategy (May 2018) sets out an approach that could still see larger sites delivered without on-site SANGs, but remain compliant with the Conservation of Habitats and Species Regulations, 2017, and Natural England does not have any concerns with this approach. This enables applications to be considered on a case-by-case basis,

delivering a flexible approach to ensure that new development is not precluded from coming forward due to constraints relating to the potential to deliver an on-site SANG.

26. Rushmoor fully recognises the challenges associated with delivering SANG, but consider that a more flexible approach should be considered by Surrey Heath. This would take into account the potential for the identification of additional SANG capacity in the future, which could enable the delivery of homes during the plan period. Rushmoor is concerned that the current approach could be underestimating the capacity of sites identified in the SLAA and therefore the ability to meet housing need within the Borough.
27. On this basis, Rushmoor would request that going forward that the issue of SANG capacity is not a constraint applied to potential development sites through the SLAA process. It is acknowledged that where there is the potential to deliver on-site SANG, this may affect the development capacity of sites, but this should not be used a reason to exclude the site all together. It would also seem appropriate in these circumstances to be working with developers and landowners to establish whether a reduced capacity could enable on-site SANG to be achieved or whether off-site SANG could be identified.
28. It is also noted in that the SLAA assessment for Pine Ridge Golf Course refers to potential for deductions to SANG capacity to take into account existing capacity uptake and existing recreational use on the site. It is acknowledged that discounts due to public use of site are likely, but would suggest that advice is sought from Natural England. Based on advice received on the Southwood Golf Course, our understanding is that no discount will be required for the areas of land that are currently only used for golf purposes. Visitor discounting is only required where there is evidence of substantial current visitor use, which would be dog walking, walking, horse riding (i.e. uses that we regularly see on the SPA).

Ability to Overcome Constraints

29. The SLAA Methodology sets out that where constraints have been identified, the assessment will consider what action would be needed to remove them, along with when and how this could be undertaken and the likelihood that the site will be delivered. However, Rushmoor is concerned that some of the assessments have not gone far enough to consider the ability to resolve constraints.
30. In some cases, it is cited that insufficient evidence has been provided to demonstrate that this constraint could be overcome. We recognise that without this evidence, it may be appropriate not to include a site as part of the potential supply of housing. However, prior to requesting that potential unmet need is addressed outside of the Borough, Rushmoor considers that it is necessary that in these instances Surrey Heath is proactive in working with developers and landowners to explore fully whether such constraints may be overcome.

Optimising Capacity on Sites

31. The Interim Capacity Study (April 2018) sets out how Surrey Heath has reassessed the capacities of sites to ensure the proposed density of development at sites is being fully optimised. In particular, Rushmoor supports the approach taken to Camberley Town Centre Area Action Plan sites, and welcomes the increased housing supply of 479 units (net) identified on these sites.
32. Given the potential for unmet need, Rushmoor would encourage Surrey Heath to continue to be proactive in exploring the potential for increasing capacity on sites already identified across the Borough. For example, it is noted that the site 'Land at Waters Edge' (SLAA Ref 803) is identified at a capacity of 150 dwellings, but a recent planning application (18/0327) has been submitted for 248 dwellings.

Additional Sites for Assessment

33. The work undertaken to identify potential sites and proactive steps taken to date to address housing need is welcomed. However, the Interim Capacity Study (2011) notes that a number of previously assessed SLAA sites have been removed from the 2017 SLAA, because their availability could not be confirmed. As a consequence, sites amounting to 197 units included in the 2016 SLAA supply were not included in the 2017 SLAA.
34. It is also noted that there may also be additional sites where discussions are taking place with landowners that have not been assessed in the SLAA due to potential lack of availability (for example, Land at Barossa Common, Camberley).
35. We would question this approach and consider that sites, such as Land at Barossa Common, Camberley, should be assessed in the SLAA, even if the conclusion is that they are not currently available. In addition, given the potential unmet need, Rushmoor consider it necessary for Surrey Heath to continue to be proactive in exploring whether any of these sites could become available for housing during the plan period.

Release of Employment Land for Housing

36. The Interim Capacity Study (April 2014) refers to evidence in the Hart Rushmoor and Surrey Heath Employment Land Review (ELR) which: "*indicated that existing Core Employment Areas in Surrey Heath should be retained as either Strategic or Locally Important sites, as well as certain other standalone employment sites in the Borough.*" It goes on to say that the conclusions of this study also indicated that some employment sites in the Borough were not functioning effectively in their current use and have been considered for alternative uses, with a primary focus on housing.
37. Rushmoor supports the approach taken to the protection of employment land. The emerging Local Plan will need to ensure it strikes the right balance between ensuring there is sufficient employment land to meet the future needs of the Functional Economic Area and releasing land for residential development where appropriate.

38. However, it appears that the preferred approach is to carry forward all Core Employment Areas without amendment, and re-designate as Strategic Employment Sites or Locally Important Employment Sites. As noted above, in addition to the loss of employment land outside designated sites, Rushmoor has had to carefully review its existing designated 'Key Employment Sites' to identify any sites or land within sites, which can be released for residential development, and has identified a supply of around 800 new homes on such sites. Therefore, Rushmoor would request that Surrey Heath ensures that it undertakes a similar process.

Conclusion

39. The Draft Local Plan calculates the housing need over the plan period as 5,632 dwellings. Of these, it identifies that 4,901 dwellings can be delivered in Surrey Heath. This results in a potential unmet need over the plan period of 731 dwellings.
40. Rushmoor considers that the principle of the three authorities working together to address demonstrated unmet need is well established. However, Rushmoor is concerned that the specific references in the Draft Local Plan to unmet need being met across the HMA, and specific references to an amount, is premature. Apart from the agreement in principle (which acknowledges that there is potential capacity to meet unmet need within the HMA), there has been no formal agreement on the amount of unmet need and/or specifically how the HMA will ensure this unmet need is addressed at this stage.
41. Before the Council requests that neighbouring authorities meet unmet need, the authority should have examined fully all other reasonable options for meeting its identified need for development and be able to demonstrate that it has taken a 'no stone unturned' approach to identifying potential capacity.
42. As set out in this response, Rushmoor has some concerns about the approach taken to identify potential capacity, to date. In particular, the Council requests that the following actions are undertaken as part of the preparation of the next stage of the Local Plan:
- Local Plan Objective A is revised and only makes reference to number of houses being accommodated within the area covered by the Local Plan
 - A clear distinction is made between housing need and the housing requirement in the Local Plan.
 - In the next iteration of the SLAA, the Council has consideration for the developing spatial strategy contained within the draft new Local Plan, rather than the existing Core Strategy.
 - A more flexible approach to delivering on-site SANG and the approach to rejecting sites through the SLAA process on the basis of SANG capacity is carefully considered, to ensure that this is not underestimating the capacity of sites identified in the SLAA and therefore the ability to meet housing need within the Borough.

- The Council is proactive in working with developers and landowners to explore whether constraints may be overcome on SLAA sites where insufficient evidence has been provided.
 - The Council continues to be proactive in exploring the potential for increasing capacity on sites already identified in the SLAA.
 - Sites where discussions are taking place, but availability is unknown, should be assessed in the SLAA
 - The Council fully explores the potential to release employment land with designated Core Employment Areas, subject to ensuring that the Local Plan strikes the right balance between providing sufficient employment land to meet the future needs of the Functional Economic Area and releasing land for residential development, where appropriate.
43. Rushmoor would welcome the opportunity to discuss in detail the steps taken to reduce unmet housing need as the Surrey Heath Local Plan progresses, as part of continued joint working.