

Hart District Council

## Local Plan project planning support

### Local Plan Project Initiation Document

Reference:

02 | 25 July 2025



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Thanks go to all the teams and individuals at Harts District Council which have contributed the production of this report: the Planning Policy and Economic Development team, the Development Management team, the Communications Team, the section 151 officer, the Chief Executive and the Planning Policy Portfolio Holder.

# Executive summary

This report presents the key requirements for Hart District Council to start production of a new Local Plan. The report presents findings related to the legal requirements, scope, resourcing, programme, risks and governance of the Local Plan. Each of these are based on assumptions which are clearly set out in the main body of the report.

## Legal requirements

A new plan making system is being introduced. The new Local Plan will need to be produced under this system and in accordance with the new 30-month Local Plan production timeframe that will be introduced by secondary legislation under the Levelling Up and Regeneration Act (LURA) 2023. Details on the legal requirements for the Local Plan can be found from page 7.

At the time of writing, in July 2025, the secondary legislation had not yet been made so formal notification of the start of the Local Plan process cannot be given until that occurs. However, significant preparatory work needs to be undertaken prior to officially starting the 30-month process. The full extent of which is presented in the report; however, this includes progressing the majority of the evidence base.

## Plan making context

Plan making does not take place in a vacuum. Therefore, it is necessary to consider wider factors, including Local Government Reorganisation and devolution; relationships with wider plans and strategies; and plan making activities of neighbouring authorities, particularly in the context of Duty to Cooperate which is due to be replaced by a new Flexible Alignment Test.

Government has been clear that despite the programme of Local Government Reorganisation and devolution, plan making must still occur at pace. To ensure value for money joint-working and ongoing engagement with neighbouring authorities is an important consideration to future-proof the evidence base work and the plan itself. The Local Plan will need to respond to wider plans and strategies, including those of the Council itself and those of wider stakeholders. Most significantly, it will need to align with an emerging Spatial Development Strategy that will be prepared by the yet to be formed Combined Authority.

## Existing policies, evidence and data

As presented at Cabinet on 2 January 2025, a review of the adopted Local Plan has confirmed the necessity to prepare a new Local Plan reflecting the significant changes in national policy and increasing datedness of the existing evidence base. A review of existing policies suggest that the vast majority should be retained with updates to reflect latest policy and guidance, or to address issues relating to their application as identified by the Development Management Team. Site allocation policies will require a full update and rewrite to ensure that the Local Plan meets the new national requirements. A small number of additional policies are also suggested to address identified gaps. Once Government publishes the anticipated National Development Management Policies (NDMP), it will be necessary to re-consider which policies are needed over and above the standard national set.

The majority of the evidence base is ten years old, or more. Therefore, it will be necessary to prepare new studies aligned with new national policy and guidance, reflecting changes



in for example, macro-economic conditions or land uses, and using the latest available datasets. The Policy and Economic Development Team are responsible for maintaining various data sets as part of their business-as-usual roles, this will continue to be a key task moving forward and will provide valuable intel for the Local Plan and its evidence base.

## Scope

The new Local Plan will set a vision, objectives and policies for the management of land use and development in Hart District and will guide infrastructure investment. Under the new plan-making framework, Local Planning Authorities (LPAs) will need to be covered by a single plan and the Local Plan will need to cover strategic and non-strategic matters. The precise scope of the Local Plan will also be dependent on the scope of NDMP, which will cover decision-making matters for the whole of England and will not need to be repeated in the Local Plan. However, policies qualifying the NDMP policies for the Hart local context may be appropriate.

Under the new plan making system, Supplementary Planning Documents will no longer exist as a planning tool and on adoption of the new Local Plan will cease to have effect. Therefore, in scoping the Local Plan, it will be necessary to consider whether the advice and guidance presented in the adopted Supplementary Planning Documents is still relevant and if so, whether it should be revised and re-published as guidance or integrated into the new style local plan.

## Plan period

To comply with legal requirements, it is suggested that the Local Plan period is 2025-2045.

## Project deliverables

Much of the detail regarding Local Plan deliverables under the new plan making system is unknown currently. However, based on information released to date, a summary of likely content and production processes has been prepared (Table 10). The emphasis is on preparing slimmed down Local Plans, using templates and specified data standards.

Government has emphasised that under the new plan making system, it is important the evidence base for Local Plans is proportionate. This is considered key to meet the 30-month timeframe. However, to date, it is unclear what this means in practice. In the absence of any further detail, a list of evidence base studies required has been developed and is considered to represent a proportionate covering of the main topics required for a sound Local Plan. A pragmatic and efficiency driven approach to defining the likely evidence base has been taken, reflecting not only the many unknowns of the new plan making system but also the Council's desire to submit a draft Local Plan prior to April 2028. For each evidence base study, a recommendation has been made as to whether it should be prepared in-house or externally (Table 11).

## Resourcing

The Hart Planning Policy and Economic Development Team comprises five permanent team members, who work both full and part time for the Team, providing an equivalent resource of 3.95 FTE officers. Once business-as-usual activities have been taken into account, the existing team has a total capacity equivalent to 2.83 FTE officers to dedicate to producing a new Local Plan. The current resources within the planning team are considered insufficient to produce a new Local Plan and several resourcing options are considered in the report.

The recommended option is a hybrid solution of targeted recruitment and Local Plan consultancy support. The programme, , budget and costs presented below are reflective of this recommended option.

The report recommends that two new positions are created and filled within the Planning Policy and Economic Development Team for:

- A policy planner
- A principal planner.

Local Plan consultancy support will bring several benefits to the plan making process, including a single appointment process, access to a wide and flexible pool of resources, cross-learning between officers and consultants and increased Local Plan project management capacity. Details on the options and the recommended resourcing profile for the Local Plan are presented from page 73.

## Programme

The provisional overarching programme for the production of the Local Plan is presented below. This programme is based on a more detailed programme which includes the different workstreams, their interdependencies, resource availability and the statutory constraint of a 30-month programme.

Key dates to note are:

- Formal notification to start the Local Plan process is programmed for February 2026, allowing for the significant preparatory work to be undertaken.
- Submission of the Local Plan for Examination is programmed for March 2028.

This ambitious programme is underpinned by multiple assumptions which are detailed in the programme chapter of the report, on page 84.

Key Step	Time Period
Preparatory evidence gathering and scoping	August 2025 - February 2026
Notification of the start of the Local Plan process	February 2026
Scoping and early participation	February 2026 - June 2026
Gateway 1 (advisory)	June 2026
Plan vision and strategy development	June 2026 – December 2026
First consultation	January 2027 – February 2027
Evidence gathering and drafting the plan	March 2027 – June 2027
Gateway 2 (advisory)	June 2027 – July 2027
Engagement, proposing changes and submission of the plan	July 2027 – March 2028
Second consultation	October 2027 – November 2027
Gateway 3 (stop/go)	January 2028 – February 2028
Examination	March 2028 – September 2028
Finalisation and adoption	October 2028

## Budget and cost

The majority of the costs associated with the production of a new Local Plan will be related to staff time and the use of consultants. Other costs to be taken into consideration relate

primarily to consultation process (e.g. specialist software, printing, hiring of premises for consultation events) and for the formal examination process (e.g. employing a programme officer, planning inspector fees, legal support). On the basis of the assumptions outlined in sections 5 and 6, and the assumed resource profile, the total cost of a new Local Plan is estimated as £2.1m, including 10% contingency and excluding permanent staff costs. Details on the budget and costs for the Local Plan are presented on page 85.

## Risks

Over the course of the proposed programme, there are a range of risks that might affect the quality, cost and timings of delivering the Local Plan. These relate to changing legislation, policy and guidance; Local Government Reorganisation and devolution; staff resources; technical skills; evidence base; consultation, engagement and flexible alignment test; finance; and governance. Further detail is presented from page 87.

A full risk register with identified mitigation measures has been developed and accompanies this report. This will need to be maintained during the lifetime of the project and used as reporting tool.

## Governance

The Local Plan is a large project to be undertaken under a tight time constraint prescribed by central government. As such, the business-as-usual governance arrangements for the planning policy team may not be regular enough or agile enough to ensure oversight of the plan making process by Councillors. Equally it is important that the governance arrangements are not too onerous so that the Local Plan can progress at pace and have the greatest chance of meeting the ambitious timetable.

It will be important to ensure that the right governance arrangements are in place by early Autumn to ensure that decisions can be made at the right times and that those decisions can be made expediently.

## Next steps

To deliver this ambitious timetable for the new Local Plan, there are various decisions and key actions that need to be made, the majority prior to September 2025. These are as follows:

- **Decision:** Agree whether to proceed with a new Local Plan on consideration of the balance of factors presented in this report, including associated risks. All other decisions and key actions will flow from this.
- **Decision:** Agree the resource plan, i.e. the recommended option of a combined team of Hart officers and Local Plan consultants.
  - **Key action:** Initiate recruitment for one principal planner and one policy planner.
  - **Key action:** Draft brief to appoint Local Plan consultants.
  - **Key action:** Launch procurement process for Local Plan consultants.
  - **Decision:** Appoint Local Plan consultants in November 2025.
- **Decision:** Agree proposed scope of work, as detailed in section 5.4, as this will form the basis for the brief for the Local Plan consultants and informs the budget decision.
- **Decision:** Agree the Local Plan budget.



- **Decision:** Agree the governance arrangements for Local Plan production.

# 1. Introduction

## 1.1 Purpose

The decision was made by Cabinet on 2 January 2025 to ‘commence preparatory work for a new local plan’<sup>1</sup>. Specifically, while the new plan-making system has not yet been introduced by secondary legislation, Cabinet resolved that a Project Initiation Document (PID) should be prepared to start the new Local Plan process.

This PID intends to set out the context, rationale and project management approach which will underpin the production of a new Local Plan for Hart District Council (HDC). It will also form the basis of the formal PID that will need to be prepared as part of the new plan-making system (see section 2). Government has yet to release detail regarding the exact content, or the proposed templates, for this new plan making requirement. However, PIDs had previously been prepared by other authorities for the purpose of strengthening the project management of their Local Plan. This PID is therefore based on best practice elsewhere and initial details published by MHCLG.

## 1.2 Structure

The document is structured as follows:

- Section 2 sets out the legislative and policy framework which will govern the production of the Local Plan.
- Section 3 explores the wider plan-making context including Local Government Reorganisation and devolution, relationship with wider plans and strategies and the state of play in neighbouring authorities with regards to plan making.
- Section 4 gives a high-level review of existing Local Plan policies, which is then used to inform the scope of the new Local Plan, presented in section 5.2. It also presents a review of the existing evidence base studies which were produced for the adopted Local Plan and for any subsequent Development Plan Document and Supplementary Documents. This section presents a conclusion on whether the existing evidence base needs updating or replacing for the new Local Plan.
- Section 5 sets out Local Plan objectives, scope, plan period, timeframe for production and Duty to Cooperate context.
- Section 6 presents the proposed approach to project management for the new Local Plan, including programme, resources, budget and risk management, governance, communication and engagement to deliver a sound and robust Local Plan.

The document has three accompanying digital files covering the Local Plan full programme, budget and risk register.

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<sup>1</sup>Hart District Council, Cabinet, 2 January 2025 Item 68: Assessment of the Hart Local Plan (Strategy & Sites) 2032, <https://hart.moderngov.co.uk/documents/s11177/Cabinet%20report%20Local%20Plan%20Review.pdf>

## 2. Legislation and policy context

### 2.1 Legislation and policy framework overview

Plan-making in England is governed by a set of legislations and policies, which prescribe how the Local Plan should be prepared and what it will need to contain. The main current relevant legislation for plan-making is made up of the:

- Planning and Compulsory Purchase Act 2004<sup>2</sup>
- Localism Act 2011<sup>3</sup>
- Town and Country Planning (Local Planning) (England) Regulations 2012<sup>4</sup>

Government is introducing new primary legislation to update the plan-making framework in England, in particular:

- Levelling Up and Regeneration Act (LURA) 2023
- Planning and Infrastructure Bill (PIB).

The LURA 2023 has not yet been fully implemented through secondary legislation, including those elements relating to plan making. At the time of drafting this report (July 2025), the PIB is still progressing through parliamentary procedures; all of the House of Commons readings and stages are complete, and the Bill is now moving through the House of Lords, currently at committee stage.

Legislation prescribes the processes for making plans, as well as some of the plan content. However, most of the main plan-making requirements are contained in national policy. National policy is not legislation and can be updated by government without the need for statutory instruments. In England, the policy frameworks for plan-making are:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)

The NPPF is updated regularly, and new Planning Practice Guidance is also published periodically. The PPG will be as important as the NPPF for plan-making going forward, as the Court of Appeal<sup>5</sup> recently stated that the PPG has the same status as the NPPF. Although not formal legislation or guidance, government has also centralised resources on plan-making into a collection called 'Create or Update a local plan'<sup>6</sup>, which is where the government intends to publish information about the new plan-making system as it becomes available.

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2 Participation, E. (n.d.). Planning and Compulsory Purchase Act 2004 [Text]. Statute Law Database. Retrieved 28 May 2025, from <https://www.legislation.gov.uk/ukpga/2004/5/contents>

3 Participation, E. (n.d.). Localism Act 2011 [Text]. Statute Law Database. Retrieved 1 July 2025, from <https://www.legislation.gov.uk/ukpga/2011/20/contents>

4 Participation, E. (n.d.). The Town and Country Planning (Local Planning) (England) Regulations 2012 [Text]. Statute Law Database. Retrieved 1 July 2025, from <https://www.legislation.gov.uk/uksi/2012/767/contents>

5 Mead Realisations Limited v Secretary of State (Court of Appeal, 30 January 2025) [https://assets.publishing.service.gov.uk/media/66012fd165ca2fc1fa7da734/9\\_Mead\\_Realisations\\_Limited\\_v\\_Secretary\\_of\\_State\\_for\\_Levelling\\_Up\\_Housing\\_and\\_Communities\\_2024\\_EWHC\\_279\\_Admin\\_.pdf](https://assets.publishing.service.gov.uk/media/66012fd165ca2fc1fa7da734/9_Mead_Realisations_Limited_v_Secretary_of_State_for_Levelling_Up_Housing_and_Communities_2024_EWHC_279_Admin_.pdf)

6 'Create or Update a Local Plan'. 2025. GOV.UK. 7 February 2025. <https://www.gov.uk/government/collections/create-or-update-a-local-plan>.

## 2.2 Legislative framework

### 2.2.1 Planning and Compulsory Purchase Act 2004

The Planning and Compulsory Purchase Act (PCPA) was enacted by Parliament in 2004. Its primary aim was to ensure that planning applications and plans were decided and made faster and more effectively. Some of its provisions have been revoked but a number of them still govern plan-making today. The provisions most relevant for plan-making are:

#### *Part 2 Local Development*

- Section 15: Requires local planning authorities to prepare and maintain a local development scheme, setting out the development plan documents, what geographical area they relate to, when they will be produced and the timetable for their preparation.
- Section 17: Outlines the requirements for the content and preparation of local development documents.
- Section 18: Specifies the need for a statement of community involvement, detailing how the authority intends to involve the community in plan-making.
- Section 19: Details the preparation of local development documents, including the need for sustainability appraisal. Local Planning Authority have a duty to identify the strategic priorities for the development and use of land in the authority's area.
- Section 20: Requires the independent examination of local development documents to ensure they are sound.
- Section 33A: Introduces the duty to cooperate, requiring local planning authorities to engage constructively with neighbouring authorities and other prescribed bodies on strategic matters.

#### *Part 3 – Development Plan*

- Section 38: States that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- Section 39: Emphasises the need for development plans to contribute to the achievement of sustainable development.

### 2.2.2 Localism Act 2011

The Localism Act 2011 was enacted by Parliament to facilitate the devolution of decision-making powers from central government control to individuals and communities. The act contained reforms to make the planning system more democratic. The Localism Act 2011 amended the Planning and Compulsory Purchase Act 2004.

Section 110: Establishes the duty to cooperate, emphasising the importance of collaborative working on strategic planning issues, and specifies the following:

- Duty to Cooperate requires constructive engagement, on an active and on-going basis (sub-section 2).
- LPAs must cooperate between each other, with county councils and other prescribed bodies (sub-sections 1).
- Duty to Cooperate is required on strategic matters for the preparation of development plan documents, the preparation of local development documents and any activities which support or prepare for the development of those (sec-section 3).

- Strategic matters are defined as sustainable development or use of land, or matter which would have a significant impact on at least two planning areas or the county, including infrastructure (sub-section 4). These areas are further defined in sub-section 5.
- Prescribed bodies should consider whether to prepare and publish agreements on how joint working will be undertaken (sub-section 6).
- LPAs should consider whether to agree under section 28 of the act whether to prepare joint local development documents (sub-section 6).
- Those engaging in Duty to Cooperate must have regards to guidance issued by the Secretary of State on how to undertake the duty (sub-section 7).

Sections 116-121: Introduce neighbourhood planning, giving communities the power to develop their own planning policies.

### 2.2.3 Town and Country Planning (Local Planning) (England) Regulations 2012

The 2012 Regulations relate to and amend the Town and County Planning (Local Development) (England) Regulations 2004, which themselves specified how development plan documents should be prepared. The most important regulations for plan-making of the 2012 Regulations are contained in part 6 'Plan-making' and contain the procedural requirements for the preparation of a Local Plan:

- Regulation 18: Requires local planning authorities to notify and invite representations from specified bodies and persons during the preparation of a local plan.
- Regulation 19: Outlines the requirements for the publication of a proposed submission plan, including making it available for inspection and inviting representations.
- Regulation 20: Specifies the procedures for making representations on the proposed submission plan.
- Regulation 22: Details the requirements for submitting documents and information to the Secretary of State for independent examination.
- Regulation 24: Sets out the procedures for the independent examination of local plans.
- Regulation 26: Specifies the requirements for the adoption of a local plan, including making the plan and adoption statement available for inspection.

### 2.2.4 Levelling Up and Regeneration Act 2023

The LURA was enacted in October 2023 and amongst other things contains the provisions to introduce a new plan-making framework. Government is gradually preparing the secondary legislation required to bring LURA into force.

As of July 2025, the secondary legislation required for the plan-making framework has yet to be made. The only section of relevance to plan-making that is in force is Section 94, which defines National Development Management Policies and gives the Secretary of State the power to introduce, revoke, modify or otherwise alter them subject to such consultation as the Secretary of State deems appropriate.

Part 3, Chapter 2 of the LURA is dedicated to development plans and sets out the new provisions, which, once in force, will supersede Sections 15-39 of PCPA 2004. It is assumed that the secondary legislation will amend the 2012 Regulations.

The following sections of the LURA are of particular relevance for plan-making.



### *Development Plans: Content*

Section 92 specifies that the following documents are part of the development plan, where relevant for the LPAs geography: spatial development strategies, local plans, mineral and waste plans, supplementary plans, neighbourhood plans and policies maps.

### *Role of development plan and national policy in England*

Section 93 which clarifies the role played by development plan documents in relation to the National Development Management Policies (NDMP). It states that decisions should be made in accordance with both the development plan and the NDMP.

### *National development management policies: meaning*

Section 94 clarifies the definition of a NDMP, which is a policy in relation to the development or use of land in England which is designated as such by the Secretary of State. The Secretary of State may revoke a NDMP or modify it at any time but must have regards to the need to mitigate and apt to climate change, both when preparing and modifying NMDPs. Where the proposed changes to the NMDP are material and not considered urgent, consultation on the changes should be undertaken.

### *Local Planning*

Section 97 and Schedule 7 contain provisions for joint spatial development strategies, local plans, minerals and waste plans and supplementary plans. This summary focuses on the provisions related to Local plans only.

### ***Local plan timetable***

Schedule 7 Section 15B specified that LPAs will be required to prepare and maintain a local plan timetable which must specify who with, where, when and how the LPA is proposing to prepare a local plan, including how they are proposing to meet the design code requirement.

### ***Local Plans***

Schedule 7 Section 15C specifies that each LPA should have a single local plan in force at any point in time. The local plan must set out policies in relation to the amount, type and location of, and timetable for, development in the local planning authority's area. The local plan must be designed to secure mitigation and adaption to climate change for the area and should take account of any Local Nature Recovery Strategy for the area. The local plan may also include:

- policies related to the use or development of land in the local planning authority's area designed to achieve objectives related to the special characteristics of the area
- details of any infrastructure and affordable housing requirements

In doing so, the local plan must take into account assessment of the amount, and type, of housing that is needed in the local planning authority's area, including the amount of affordable housing that is needed.

Schedule 7 Section 15C(9)(b) is clear that the local plan must not be inconsistent with NDMP nor repeat any NDMP.

### ***Local plans preparation and further provision***

Schedule 7 Section 15CA specifies that the local plan must be prepared in accordance with its timetable and in general conformity with the spatial development strategy. The LPA

may seek observations and advice from PINS on the local plan at any time, against a fee. The section also lists the other documents which an LPA needs to have regards to when preparing their local plan.

### ***Independent examinations: local plans***

Schedule 7 Section 15D explains the purpose and process of an examination. LPAs will be required to submit their local plans for independent examination by a person appointed by the Secretary of State to determine whether the plan can be considered sound. The section details the requirements which must be met by the LPAs in submitting their local plans for examination.

### ***Pause of independent examination for further work***

Schedule 7 Section 15DA specifies how and when an examination can be paused to allow for further work to be done.

### ***Withdrawal and adoption of plans***

Schedule 7 Section 15E and 15EA specifies that an LPA can withdraw a plan before it is submitted for examination. However, once the local plan has been submitted for examination, the LPA will not be able to withdraw the plan unless recommended to do so by the examiner or by the Secretary of State. Once a local plan has been found sound by the examiner, the LPA may adopt the plan.

### ***Design code for whole area***

Schedule 7 Section 15F requires LPA to ensure that their development plan include requirements with respect to design which relate to development or development of a particular description and which need to be met for planning permission to be granted. The design requirements do not need to cover every part of the LPA area, every type of development nor be in relation to every aspect of design.

### ***Neighbourhood Planning***

Sections 98 and 99 of the Act specify that a neighbourhood plan must include policies for the development and use of land in the neighbourhood area. Conditions are laid out in section 99 to ensure that neighbourhood plans and orders are consistent with national policies and help mitigate and adapt to climate change.

### ***Requirement to assist with plan-making***

Section 100 states that where an LPA notifies a prescribed body to assist in relation to the preparation of the local plan, the prescribed body must do everything that the LPA reasonably requires of the body to assist in relation to the preparation or revision of the relevant plan.

### ***Minor and Consequential Amendments***

Section 101 lists amendments to ensure that the changes introduced by the Act are effectively integrated into existing legislation.

### ***Duty to Cooperate***

The provisions contained in Schedule 7 of the LURA 2023 will repeal the Duty to Cooperate by replacing sections 15 to 37 of the Planning and Compulsory Purchase Act 2004, including section 33A which contains the Duty to Cooperate. The government has announced that they intend to replace it with a more flexible and locally tailored approach

to strategic planning, called a Flexible Alignment Policy. There are currently no published details on what will be required of LPAs under the Flexible Alignment Policy.

### 2.2.5 Planning and Infrastructure Bill

The Planning and Infrastructure Bill was published on 11 March 2025 and aims to accelerate the delivery of housing and critical infrastructure to support economic growth and environmental goals. The bill has five overarching objectives, one of which is to introduce effective new mechanisms for cross boundary strategic planning. It requires Spatial Development Strategies (SDS) to be produced by strategic planning authorities (SPA). SDS need to identify strategic infrastructure and amount/distribution of housing, consider climate change adaption/mitigation, and address health issues/inequalities and nature recovery. Maintaining focus on delivery, the Bill requires SPA to develop SDS timetables, set out consultation programmes, examination and monitoring/update. There is also a focus on pace; Government may intervene where progress is limited. The SDS will form part of a Local Authority's Development Plan when adopted.

SDS will be prepared by combined authorities, combined county authorities, upper-tier county councils, and unitary authorities. The Bill also enables the Government to establish 'strategic planning boards' to prepare a SDS for areas spanning multiple authorities where the Secretary of State considers it desirable to do so. Given the parallel reform of Local Government, it is not yet clear, who will hold responsibility for the production of the SDS within Hampshire.

Although the Government has yet to confirm the timetable for the production of SDS, they have suggested they want to see them published during the current political term. The introduction of SDS will have a number of effects for the production of the Local Plan, including:

- The Local Plan will need to be in general conformity with the SDS and its strategic objectives and overall growth strategy.
- Hart District Council, including the planning team, will need to engage with the preparation, review and monitoring of the SDS, adding to existing workloads and potentially diverting resourcing from Local Plan production. The extent and timing of this involvement is unknown at the moment.

### 2.2.6 Anticipated changes / timeframes

On 25 July 2023, government issued a consultation on the implementation of the plan-making reforms, as proposed by the LURA 2023. Due to a change in government in July 2024, government's response to the consultation was only published on 27 February 2025. Accompanying the consultation response, the new government issued a ministerial statement highlighting their commitment to *'proceed largely as set out in that consultation, with necessary regulations, policy and guidance to be confirmed later this year'*.<sup>7</sup>

While full details of the proposals are yet to be published, the 2023 consultation and the government's response give some useful details on the key characteristics of the new system.

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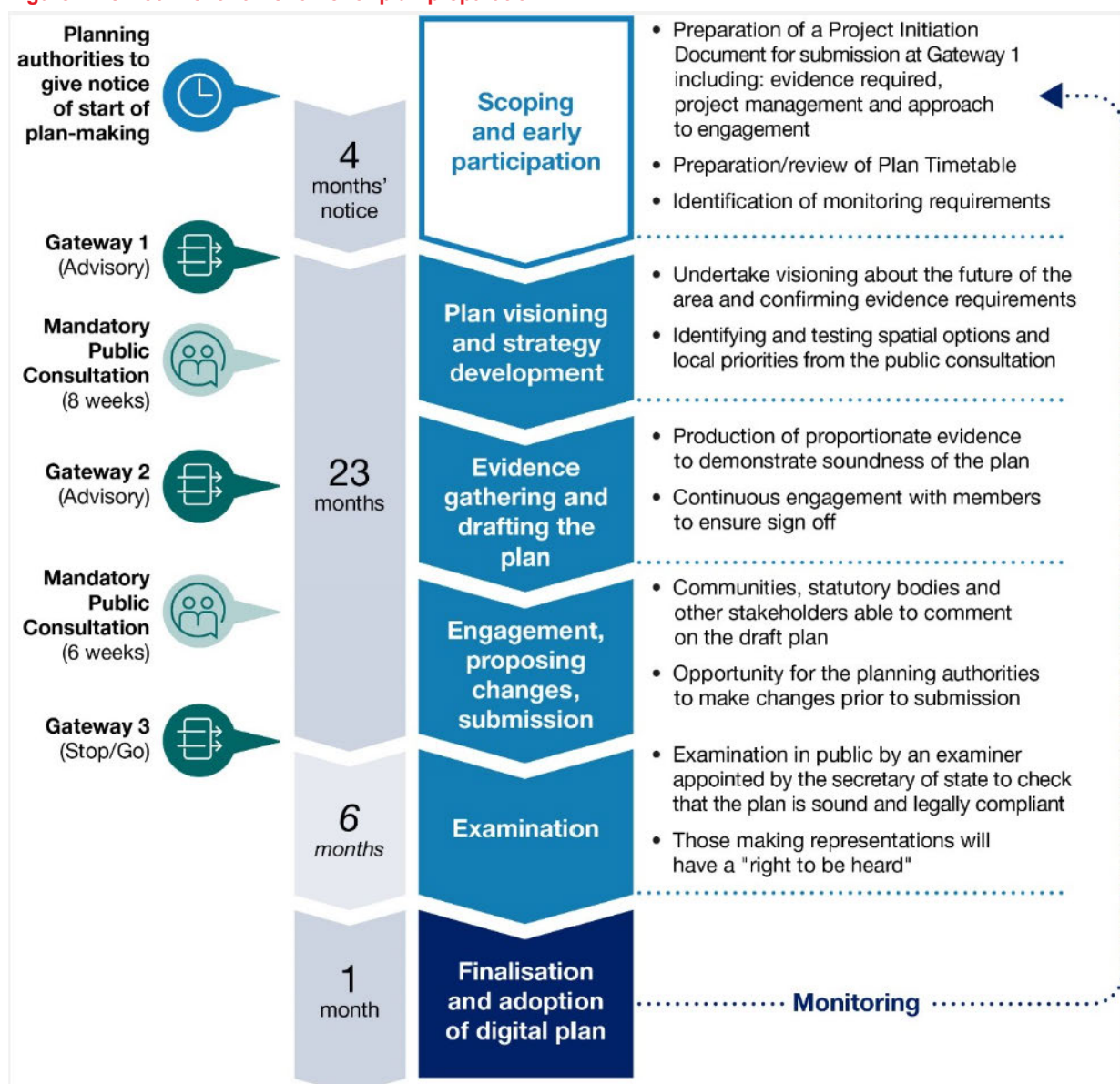
<sup>7</sup> Local Plan-Making and Guidance, Matthew Pennycook, Statement made on 27 February 2025, <https://questions-statements.parliament.uk/written-statements/detail/2025-02-27/hcws480>

## The new 30-month plan timeframe

The planning reform consultation response was clear that any plan that is expected to be submitted for Examination after December 2026, should be prepared under the new plan making system – as detailed in LURA. The planning reform implementation consultation provided an indicative timeline for the new proposed plan making timeframe of 30 months, as detailed in Figure 1. It should be noted that the government's consultation response confirmed that they intend to swap the periods for two consultation events i.e. the first mandatory public consultation will be for six weeks and the second for eight weeks.

The government intends to publish a more comprehensive suite of guidance, tools and templates for Local Plans in order to help achieve the timeframe. Project Initiation Documents will be required to be proposed during the scoping stage and should be used as tool to prepare the submission for gateway 1.

**Figure 1 New 30-month timeframe for plan preparation**



Source: MHCLG / DLUHC (2023) Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms

### *Plan content*

Government intends the new plans to be simpler, shorter and more visual. Core principles, published by government, will guide the content of plans and what the key components of the plan should be (key diagram, spatial strategy, site allocations...). The vision is proposed to become a more central element of the plan, which will need to be anchored in measurable outcomes.

The consultation proposes that government introduces a series of templates for specific parts of the plan. Templates are expected to be provided for:

1. The notice to commence
2. Local plan timetable
3. Project Initiation Documents (PIDs)
4. Reports associated with gateway assessments (including self-assessment forms for the first gateway)
5. Annual Monitoring Reports

### *Digital plans*

There was a clear support in the consultation for greater standards and consistency of formats and data across plan making and government is developing guidance and tools to support digital planning initiatives, adopt modern planning practices and deliver efficiencies through digital tools.

### *Local plan timetable*

The government will require planning authorities to revise their timetable at set milestones and regular intervals. It is proposed that the timetable should be updated upon completion of the first gateway and no later than one month after any other defined milestone has been reached or missed. Local authorities will also be required to revise their timetables at least once every 6 months, if their review determines that an update is required.

### *Evidence and text of soundness*

Government intends to introduce changes which would reduce the amount of evidence required to prepare a plan and defend it at examination. Proposals include clarifying expectation for preparing evidence base; increasing standardisation of key evidence and data; freezing data or evidence at particular points of plan-making; streamlining and focusing new plan; and supporting on evidence requirements through gateway assessments.

Government intends to publish clearer policy and guidance to help streamline evidence base, including an end-to-end approach to site identification, assessment and selection, and additional guidance on the evidence that is expected to demonstrate that a plan is sound.

### *Gateway assessments during plan-making*

Gateway assessments will be designed to be a flexible and supportive system, which will bring advice targeted at those areas of plan preparation which pose the greatest risks to the soundness and legal compliance of the plan. The government also intends that a suite of guidance, checklists and flexible templates is introduced to support planning authorities in preparing for gateway assessments.

Government's intention is to introduce three gateways (Figure 2):



- at the beginning of the 30-month process, following work undertaken at the scoping stage
- part-way through the plan preparation, between the two mandatory consultation windows
- following the second mandatory consultation window when the planning authority intends to submit the plan for independent examination.

The first gateway, which this PID will support, will be less focussed on the soundness of the plan and more focused on ensuring that the right processes and resources are in place to support delivery of the plan. The self-assessment form which will need to be complete for the gateway will need to be published and will start the official 30-month timeframe for plan preparation.

**Figure 2 Gateway assessments**

	 <b>Gateway 1</b> (Advisory)	 <b>Gateway 2</b> (Advisory)	 <b>Gateway 3</b> (Stop/Go)
 <b>Focus</b>	<ul style="list-style-type: none"> <li>• Ensuring the plan sets off in the right direction</li> <li>• Supporting early diagnosis of potential issues – legal and procedural requirements and soundness</li> </ul>	<ul style="list-style-type: none"> <li>• Supporting early resolution of potential soundness issues, where possible</li> <li>• Ensuring legal and procedural compliance</li> <li>• Monitoring and tracking progress</li> </ul>	<ul style="list-style-type: none"> <li>• Checking the plan is ready to proceed to examination</li> <li>• Ensuring legal and procedural compliance</li> <li>• Monitoring and tracking progress</li> </ul>
 <b>Role</b>	<ul style="list-style-type: none"> <li>• Advising, observing and supporting</li> </ul>	<ul style="list-style-type: none"> <li>• Advising, observing and supporting</li> </ul>	<ul style="list-style-type: none"> <li>• Validating that key requirements have been met (a "stop/go" check)</li> </ul>
 <b>Duration</b>	<ul style="list-style-type: none"> <li>• 4 weeks (up to 6 by exception)</li> </ul>	<ul style="list-style-type: none"> <li>• 4 weeks (up to 6 by exception)</li> </ul>	<ul style="list-style-type: none"> <li>• 4 weeks (up to 6 by exception)</li> </ul>

Source: MHCLG / DLUHC (2023) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/levelling-up-and-regeneration-bill-consultation-on-implementation-of-plan-making-reforms#chapter6>

### **Plan examination**

The consultation proposed that examinations of local plans should take no longer than six months, extended by a maximum of three months if a consultation on proposed modifications to the plan is needed. Specific proposals on how to implement this have not yet been published but government has re-iterated its support for these measures in its response to the consultation. Government is also proposing that a maximum pause of six-month could be allowed during examination to enable the LPA to undertake further work should it be required.

### **Community and engagement consultation**

Government would like to increase the amount of engagement that takes place during plan-making by supporting authorities to reach a broader audience and management engagement more effectively. There is a proposal for local authorities to notify and invite participation in the plan prior to the commencement of the 30-month process. This early participation should test how communities would like to be engaged in the subsequent plan making process and documented in the PID as part of the overall engagement strategy. Stakeholders will need to be 'notified', and early participation invited on matters

that will shape the direction of the plan. This requirement will sit within the scoping stage, prior to the commencement of the 30-month process. Key feedback from communities and statutory bodies will need to be captured within the PID.

### *Requirement to assist with certain plan-making*

The government is proposing to set which prescribed public bodies will be concerned by the 'Requirement to Assist with Certain Plan Making' set out in the LURA. This is also likely to include infrastructure providers.

### *Saving existing plans and planning documents*

The government has made clear in their consultation response that existing development plan documents and saved policies will remain in force until the planning authority adopts a new style local plan. Supplementary Planning Documents (SPDs) will remain in force until the planning authority adopt a new style local plan, upon which the SPD will cease to be in force.

## **2.3 Policy and guidance framework**

### **2.3.1 National Planning Policy Framework**

The NPPF (December 2024 with minor updates Feb 2025) provides the overarching policy framework for planning in England. Chapter 3 of the NPPF sets out the government's expectations for the plan-making process. It emphasises the importance of having an up-to-date and positively prepared development plan that provides a clear vision for the future development of an area. The chapter outlines the principles for plan preparation, the need for strategic and non-strategic policies, and the importance of effective cooperation between local planning authorities and other bodies. It also sets out the tests of soundness that plans must meet to be considered robust and effective.

### **2.3.2 Planning Practice Guidance<sup>8</sup>**

The Plan-Making<sup>9</sup> section of the PPG provides detailed guidance on the preparation and development of local plans within the planning policy framework. It outlines the statutory duties of local planning authorities, emphasising the importance of creating up-to-date and effective development plans that address strategic priorities such as housing, employment, and infrastructure. Further to this, the PPG offers practical advice on the plan-making process, including evidence gathering, public consultation, and cooperation with neighbouring authorities and relevant bodies.

### **2.3.3 Anticipated changes**

As set out above, the regulations to bring into force National Development Management Policies (NDMP) have already been made. These policies will cover many of the 'general' policies typically found in Local Plans. New Local Plans should not repeat the new NDMP. The 2023 Government consultation indicated that NDMP would be published separately from the NPPF, which would be re-published focusing solely on the principles of plan making. Government has announced its intention to consult on the NDMP this year.

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<sup>8</sup> [Planning practice guidance - GOV.UK](#)

<sup>9</sup> [Plan-making - GOV.UK](#)

## 3. Plan making context

### 3.1 Wider context

The production of a Local Plan is not undertaken in a vacuum, as well as responding to the legal and policy framework, it will be necessary to consider the wider context. The key relevant wider factors to consider are the implications of Local Government Reorganisation (LGR) and devolution; relationship with wider plans and strategies; and plan making activities of neighbouring authorities, particularly in the context of Duty to Cooperate or the new Flexible Alignment Test.

### 3.2 Local Government Reorganisation and devolution

Government started a wide programme of reforms to Local Government in December 2024. This is focused on two main pillars:

- The aggregation of District, Borough and County Councils into unitary authorities, likely to represent at least 500,000 residents. All council services, including the ones currently covered by Hart District Council, will be transferred to these new unitary authorities. Local Plan making will become the responsibility of the newly formed unitary authorities.
- The creation of Combined Authorities with devolved powers. These will cover several unitary authorities and will be in charge of preparing Spatial Development Strategies (SDS). It is intended that SDS will apportion the aggregation of Local Housing Need from the constituent authorities within those same authorities, based on growth constraints and sustainability considerations.

On 6 February 2025, MHCLG invited authorities to submit proposals for unitary authorities under LGR. In March 2025, Hampshire County Council and its partners submitted an interim plan for the 15 constituent authorities of Hampshire and the Solent. Other options have also been put forward by the constituent authorities of Hampshire.

Hart District Council's preference is to create a unitary authority composed of Hart District Council, Basingstoke and Dean Borough Council, and Rushmoor Borough Council. This one council for north Hampshire would deliver the services currently provided by Hampshire County Council and the borough and district councils across the three areas. This would serve approximately 407,500 residents. The formation of unitary authorities for Hampshire and the Solent are to be agreed following a request for clarification to government and a final proposal is to be submitted to government in Autumn 2025. New Unitary Council arrangements are likely to be established in 2027 in shadow form and in 2028 in final form.

The new unitary authorities will fall within a new Combined Authority covering Hampshire, Portsmouth, Southampton and the Isle of Wight, which is one of six areas subject to the devolution priority programme. It aims to become a mayor-led strategic authority by May 2026.

On 3 June 2025, government re-iterated through a ministerial statement that they expect local plans to continue being produced while LGR is on-going:

*'Accordingly, as stated in my invitation letters, I continue to expect local planning authorities to work towards the adoption of an up-to-date local plan as soon as possible. Local Government Reorganisation should not hinder this essential work;*

*and neither should the introduction of the new legal framework for local plan-making later this year, or our strategic planning reforms.’<sup>10</sup>*

It remains a priority of the Council to work towards a new local plan and consideration has been given to joint working with neighbouring authorities to ensure value for money and future-proof the evidence base work and plan itself. This is considered further in Section 5.

### 3.3 Relationship with wider plans and strategies

The Local Plan will need to respond to wider plans and strategies produced by the Council, including the Corporate Strategy and Housing Strategy, as well as those of key stakeholders, such as Hampshire County Council. The key documents are summarized in Table 1.

Significantly, while the Local Plan is in production it will need to align with an emerging SDS, as already discussed in section 2.3.5.

**Table 1 Wider plans and strategies**

Stakeholder	Strategy / Plan	Key Messages
Hart District Council	Hart Corporate Plan 2023-2027 <sup>11</sup>	<p>The Corporate Plan has three focus areas:</p> <ul style="list-style-type: none"> <li>Planet – make all areas directly under the control of the Council carbon neutral by 2035 and make Hart a carbon neutral district by 2040.</li> <li>People – fair treatment for all, help for those in need, and a sustainable economy that makes Hart a great place to live, work and enjoy.</li> <li>Place - delivering warmer, better homes in sustainable locations that people can afford to live in.</li> </ul>
Hart District Council	Hart Housing Strategy 2020-2025 <sup>12</sup>	<p>The strategy sets Hart’s vision for housing in its area and sets out the objectives and actions that the Council and its partners will undertake in order to deliver their strategic role to meet housing need. Each of the following objectives are underpinned by actions.</p> <ul style="list-style-type: none"> <li>Objective 1: Maximising delivery of high quality, suitable and affordable new homes throughout the district</li> <li>Objective 2: Making best use of all housing, both new build and existing stock</li> <li>Objective 3: Working in partnerships to create sustainable and healthier communities</li> </ul> <p>The strategy feeds into the Housing Service’s work plan and will contribute to the overarching corporate aims for housing set out in the Corporate Plan.</p>
Hart District Council	Declaration of climate emergency	<p>Hart’s declaration commits the Council to:</p> <ul style="list-style-type: none"> <li>making climate change a priority for the district</li> <li>committing to becoming a carbon-neutral Council by 2035</li> <li>committing to becoming a carbon-neutral district by 2040</li> <li>putting reduction of CO<sub>2</sub> emissions in Hart at the centre of all policies and formal decision-making</li> </ul>
Hart District Council	A prosperous future for	<p>This is a 10-year strategy to support the development of a prosperous local economy in Hart. The strategy gives a baseline overview of the key characteristics of the Hart economy in 2025 and develops the</p>

<sup>10</sup> Local Government Reorganisation, Jim McMahon, Statement made on 3 June 2025, Statement UIN HCWS676, <https://questions-statements.parliament.uk/written-statements/detail/2025-06-03/hcws676>

<sup>11</sup> <https://www.hart.gov.uk/about-council/strategies-plans-and-policies/corporate-plan-2023-2027>

<sup>12</sup> <https://www.hart.gov.uk/sites/default/files/2023-01/Housing%20Strategy%202020-2025%20-%20FINAL.pdf>

Stakeholder	Strategy / Plan	Key Messages
	Hart: Local Economy Strategy <sup>13</sup>	<p>following priorities for the Hart economy going forward, highlighting what role the Council can play in fostering these:</p> <ul style="list-style-type: none"> <li>• Promoting Hart's investment opportunity</li> <li>• Supporting Hart's innovative edge</li> <li>• Creating flourishing town and village centres</li> <li>• Enabling access to lifelong learning</li> <li>• Unlocking everyone's potential</li> </ul>
Hart District Council	Green Grid Strategy	The Hart Green Grid framework aims to improve the quality of life and the environment within the district. By creating a network of green corridors, this framework aims to connect communities, enhance access to green spaces and promote sustainable living. The strategy is based around three key pillars of people, place and planet, which help structure its aims and objectives. These are reflective of the objectives in the Hart Corporate Plan. Three pilots projects have already been implemented under the framework.
Hart District Council	Biodiversity Action Plan 2018-2023 <sup>14</sup>	The Biodiversity Action Plan (BAP) seeks to deliver specific projects, many of which are linked to the aspirations within the Corporate Plan for protecting and enhancing biodiversity in Hart. A new Biodiversity Action Plan is currently being drafted.
Hampshire County Council	Local Transport Plan 4 <sup>15</sup>	Hampshire County Council has a statutory requirement to have a Local Transport Plan that outlines its vision for future transport and travel infrastructure. Published in February 2024, their vision is to develop a "carbon neutral, resilient and inclusive transport system designed around - and with – people, which: supports health, wellbeing and quality of life for all; supports a connected economy and creates successful and prosperous places; and respects and seeks to enhance Hampshire's unique natural and built environment". Key points from the Local Transport Plan (LTP4) include shifting away from planning for and reliance on vehicles, to provide a range of high-quality travel options, to support sustainable economic development and regeneration and to meet national priorities to decarbonise the transport system.
Hampshire County Council	Hampshire 2050, Vision for the Future <sup>16</sup>	This sets a vision for Hampshire around the six strategic themes of demographic and societal challenges; economy; work, skills and lifestyle; environment and quality of place; mobility, connectivity and energy; and rural Hampshire. In 2024-25, the key focus of the Hampshire 2050 Partnership is 'Improving health, care and wellbeing' and a roadmap has been published to help partners implement the vision.
Hampshire County Council	Hampshire Minerals and Waste Local Plan	Hampshire County Council is in the process of preparing a new plan for the county. It will be necessary to consider whether there are any impacts arising from the draft plan.
<b>Hampshire County Council</b>	Local Nature Recovery Strategy	Hampshire County Council is currently consulting with the public and supporting authorities on their Local Nature Recovery Strategy (LNRS). Final publication is timetabled for December 2025. The LNRS will consist of a map of the most valuable areas for wildlife, a list of opportunities to improve nature in the future and accompanying list of local priorities. The aim of LNRS is to help provide common focus across sectors and help partners deliver: biodiversity net gain and integrate opportunities for nature recovery into the planning system.

<sup>13</sup> <https://www.hart.gov.uk/sites/default/files/2025-06/A-prosperous-future-for-Hart-March-2025.pdf>

<sup>15</sup> <https://www.hants.gov.uk/transport/localtransportplan>

<sup>15</sup> <https://www.hants.gov.uk/transport/localtransportplan>

<sup>16</sup> <https://www.hants.gov.uk/aboutthecouncil/haveyoursay/visionforhampshire2050>



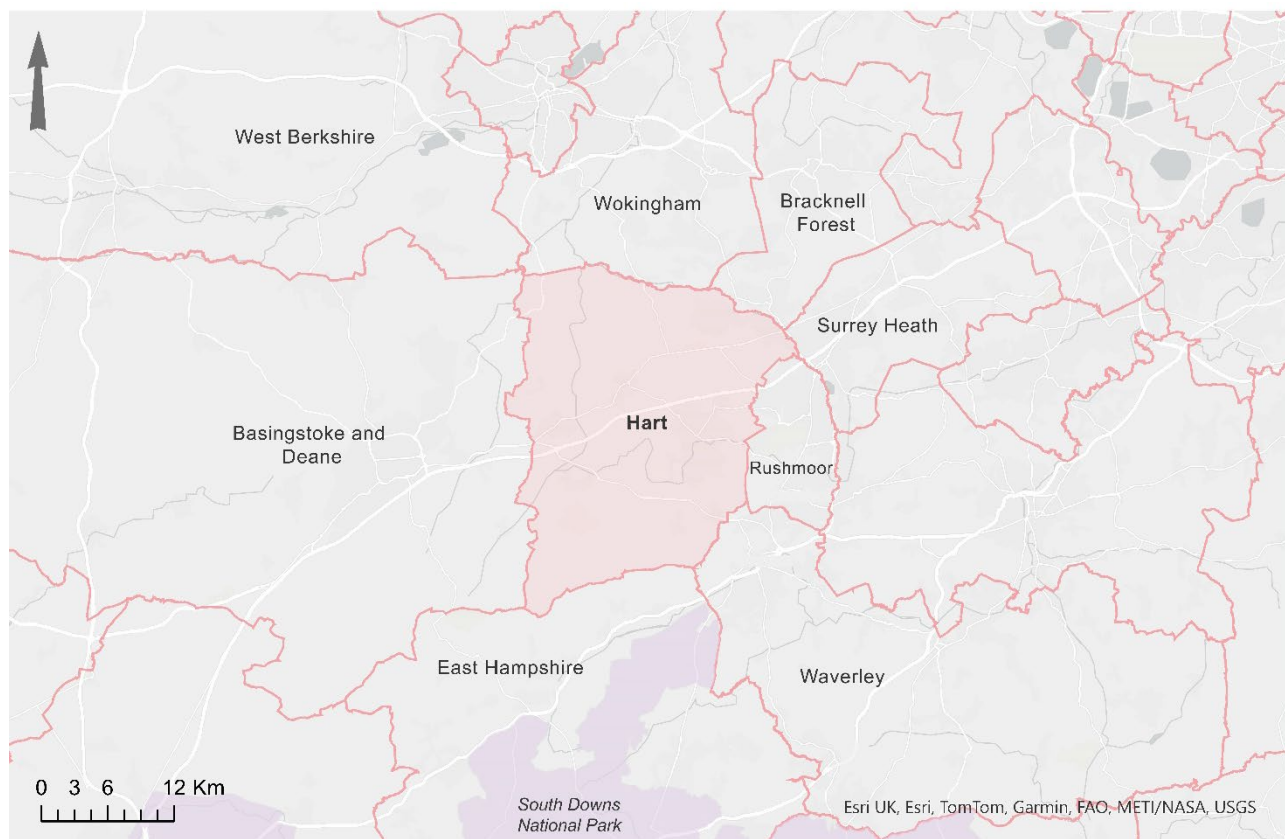
Stakeholder	Strategy / Plan	Key Messages
Transport for South East	Transport Strategy for the South East <sup>17</sup>	The Draft Transport Strategy for the South East (December 2024) outlines a comprehensive vision for enhancing the region's transport network to support sustainable growth and improve quality of life. It focuses on five key missions: improving strategic connectivity, enhancing network resilience, tackling social exclusion, decarbonising transport, and promoting sustainable growth. The strategy emphasises the need for integrated and sustainable transport solutions, including the development of mass transit systems, active travel infrastructure, and zero-emission vehicles. It also highlights the importance of aligning transport initiatives with local and national policies to ensure cohesive and effective implementation. The strategy aims to address current challenges such as congestion, carbon emissions, and transport-related social exclusion, while also preparing for future risks and opportunities

### 3.4 Neighbouring authorities

Hart neighbours eight other local authorities (Figure 3). It is good practice that consideration is given the possibility of joint working with regards to plan making. The majority of the District's neighbouring authorities are not at an appropriately equivalent point in the Local Plan review cycle (Table 2). However, Rushmoor and Waverley are at similarly early stages of plan making. There may be opportunities for joint work, including on evidence base studies. For the adopted Local Plan, Hart, Rushmoor and Surrey Heath were identified as sharing a housing market area and therefore it may make sense to consider joint working between Rushmoor and Hart on housing evidence, for example. However, Surrey Heath's Local Plan is currently at Examination stage and therefore joint working is not an option. Options for joint working with Rushmoor and Waverley will need to be explored as part of Duty to Cooperate discussions (or any successor arrangements).

<sup>17</sup> <https://transportforthesoutheast.org.uk/app/uploads/2024/12/Draft-Transport-Strategy.pdf>

**Figure 3 Hart and the neighbouring local planning authorities**



**Table 2 Local Plan status in neighbouring authorities, July 2025**

Neighbouring Authority	Local Plan status
Bracknell Forest	The Bracknell Forest Local Plan was adopted on 19 March 2024.
Wokingham	The Wokingham Borough Local Plan Update 2023-2040: Proposed Submission Plan was submitted to the Secretary of State for examination on Friday 28 February 2025. As of July 2025, Inspectors have been appointed but dates for the hearings are still awaited.
West Berkshire	The West Berkshire Local Plan Review 2022-2039 (LPR) was adopted as of June 10 <sup>th</sup> 2025.
Basingstoke and Deane	<p>The council's Local Plan, which was adopted in May 2016. A new Local Plan is in preparation. As of July 2025, consultation on draft Plan (Regulation 18) has been completed, and the following schedule outlines the proposed timetable to adoption.</p> <ul style="list-style-type: none"> <li>- Additional consultation on draft Plan (Regulation 18) to take account of the new NPPF – Autumn/Winter 2025</li> <li>- Publication of the Proposed Submission Draft Local Plan (Regulation 19) and period of consultation (Regulation 20) – Summer 2026</li> <li>- Submission of Plan to the Secretary of State for independent (Regulation 22) – Winter 2026</li> <li>- Examination (Regulation 24) – Spring 2027</li> <li>- Adoption (Regulation 26) – Winter 2027</li> </ul>
East Hampshire	<p>The Joint Core Strategy (JCS) was adopted on 8 May 2014. A new Local Plan is in preparation. As of July 2025, Regulation 18 is completed, and the following timeline sets out the programme to adoption:</p> <ul style="list-style-type: none"> <li>- Publication of Submission Draft Local Plan (Regulation 19) – end of July 2026</li> <li>- Submission of Plan to Secretary of State for independent examination (Regulation 22) – Nov 2026</li> <li>- Adoption – Aug 2027</li> </ul>

<b>Neighbouring Authority</b>	<b>Local Plan status</b>
South Downs National Park	<p>The South Downs Local Plan was adopted in July 2019. A new Local Plan is in preparation. Regulation 18 consultation was conducted in Jan-March 2025. The following timeline has been set for the programme to adoption:</p> <ul style="list-style-type: none"> <li>- Regulation 19 publicity (Q4 2025/26)</li> <li>- Submission to Secretary of State for independent examination (Q2 2026/27)</li> <li>- Adoption (Q1 2027/28)</li> </ul>
Waverley	<p>The Local Plan Part 1: Strategic Policies and Sites (LPP1) was adopted in February 2018 and Local Plan Part 2: Site Allocations and Development Management Policies (LPP2) was adopted in March 2023. A new Local Plan is in preparation and the following timeline has been set:</p> <ul style="list-style-type: none"> <li>- Engagement on visioning and the scope and content of the plan (Early Summer 2025)</li> <li>- Engagement on issues and options (October/November 2025)</li> <li>- Consult on preferred options plan (November/December 2026)</li> <li>- Publish submission plan for consultation (August/September 2027)</li> <li>- Submit plan for examination (December 2027)</li> <li>- Adopt plan (July 2028)</li> </ul>
Rushmoor	<p>The Rushmoor Local Plan was adopted on 21 February 2019. A new Local Plan is under preparation and the following timeline has been set:</p> <ul style="list-style-type: none"> <li>- Scoping and Early Participation (September - December 2025)</li> <li>- Plan visioning and strategy development (January – June 2026)</li> <li>- Evidence gathering and drafting the plan (July 2026 – June 2027)</li> <li>- Engagement, proposing changes and submission (July – December 2027)</li> <li>- Examination (January – June 2028)</li> <li>- Adoption of the Plan (July 2028)</li> </ul>
Surrey Heath	<p>The Core Strategy and Development Management Policies Development Plan Document was adopted in 2012.</p> <p>Surrey Heath Borough Council is preparing a new Local Plan to cover the period up to 2038. The draft Local Plan was submitted to the Secretary of State for independent examination in public by a Planning Inspector on 10 December 2024. As of July 2025, an Inspector has been appointed but no hearing dates have been scheduled.</p>

## 4. Review of existing policies, evidence base and documents / data

### 4.1 Local Plan review

LPAs are required to review their Local Plan every five years<sup>18</sup>. The outcome of the review should conclude either:

- that the Local Plan policies are still sound and up-to-date and that no update is required; or
- that a partial update is required; or
- that a full update is required.

Hart District Council undertook a review of the Hart Local Plan policies against the NPPF 2023 at the end of the 2024. The outcome of the review was reported to Cabinet on 2 January 2025<sup>19</sup>. The review concluded that an update is required for multiple reasons, including to:

- a) maintain a five-year housing land supply
- b) update existing outdated policy for Gypsies, Travellers and Travelling Showpeople
- c) refresh dated evidence base studies supporting policies
- d) review 'saved' policies from the previous Local Plan adopted in 2002.

The Council review took place prior to the publication of the NPPF 2024, which brought significant changes to national planning policy and the publication of new Local Housing Need figures. As noted in the Cabinet report, this does not change the conclusion but rather reinforces the case that work needs to begin on a new Local Plan.

As discussed in 2.3.3, the Government is intending to publish NDMP and a slimmed down NPPF focussing on plan making this year. The scale of national policy changes since the current Local Plan was adopted coupled with the further anticipated changes means that a full update is required.

### 4.2 Existing policies

As part of this commission, a high-level review of the Hart Local Plan policies from the 2020 plan was undertaken in consultation with Hart Development Management team and in the context of the NPPF 2024. The purpose of the review was to identify likely actions, i.e. retain policy with updates or consider further as to whether policy still needed, either because Development Management Team do not use it or policy repeats or is superseded by national policy (Table 3, Table 4). Potential areas for additional policy were also identified.

Following engagement with the Development Management team, five of the saved policies from the 1996-2006 Plan have been identified as useful in principle and referenced often. They have been suggested for retention with any necessary updates to reflect the latest

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<sup>18</sup> [NPPF 2024, paragraph 34](#)

<sup>19</sup> <https://hart.moderngov.co.uk/documents/s11177/Cabinet%20report%20Local%20Plan%20Review.pdf>

policy guidance and evidence. The 16 other saved policies have suggested for further consideration as to whether they are still need as they are not used in decision-making.

It is important to note, that this review will be indicative only of future work required, given the further anticipated national policy changes and the need to prepare a new evidence base. It is possible that the new evidence base studies, will require a new policy approach to be adopted, while the publication of NDMP may reduce the scope of the policies required in the Local Plan. Once the NDMP are published, consideration will need to be given as to whether there are any locally specifically development management policies required to complement the national policies. Nevertheless, it is still considered a helpful exercise at this stage to identify the likely scale and scope of work required.

**Table 3 Summary of policy review**

Action	Policy
Retain with updates to reflect latest policy, guidance and evidence	SS1, SS2, H1, H2, H3, H4, H6, ED1, ED2, ED3, ED4, ED5, ED6, NBE1, NBE2, NBE3, NBE4, NBE5, NBE6, NBE8, NBE9, NBE10, NBE11, INF1, INF2, INF3, INF4, INF5, INF  GEN1, URB11, URB24, CON7, CON8.
Further consideration needed as to whether required due – either not used or no longer required by DM team and / or repeats/ superseded by national policy	SD1, H5, NBE7, INF6, INF7, INF8  GEN2, GEN6, CON10, CON23, RUR1, RUR8, RUR10, RUR32, RUR33, RUR34, RUR36, RUR37, URB1, URB18, URB19, T6

### *Gaps in existing policies*

Discussions with the Hart Development Management team allowed the identification of gaps in the policies, in light of national priorities and the type of development which is coming forward in the District. The following gaps were identified:

- A policy on no net loss of dwellings
- A policy on external and amenity space, which could be amalgamated with either NBE9 or GEN1. Any new policy on external and amenity space will have to build on the national Building Standards and on the new Design Code for the district.
- A policy on good design, building on the new Design Code
- A policy regulating applications on battery storage
- A policy regulating the use of residential properties as small care homes for children, and
- A policy which addresses climate change and Biodiversity Net Gain

The evidence base for the Local Plan will be required to support the development of these policies. It is possible that some of these are addressed through the NDMP in which case they would be scoped out of the new Local Plan.



**Table 4 Local Plan policy review**

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
Sustainable Development & Spatial Strategy	SD1 Sustainable Development	Strong The policy reflects the overall hierarchy of national and local policies and reflects the presumption in favour of sustainable development contained in the NPPF (NPPF 2024, paragraph 11). The policy could be strengthened to incorporate the Sustainable Development Goals of paragraphs 7, 8, 9 and 16 of the NPPF 2024.	Covered by national policy, potentially not needed.	Consider further if still needed – repeats national policy/ guidance
	SS1 Spatial Strategy and Distribution of Growth	Weak The Local Housing Need for Hart has now increased to 750 dwellings a year, rendering the policy mostly out of date. The current housing allocations are still up to date and could be saved in a future Local Plan if not fully delivered.	The principle of the policy is useful, however this will need updating.	Retain with updates to reflect latest policy, guidance and evidence
	SS2 Hartland Village	Strong The policy governs the delivery of Hartland village, most of which is still compliant with the NPPF.	While Hartland Village is still being permitted, this policy needs to be retained.	Retain with updates to reflect latest policy, guidance and evidence
Housing	H1 Housing Mix: Market Housing	Moderate The policy is still capable of guiding development and is not at odds with the NPPF. Updated evidence is required to understand whether the policy is still justified.	The overall principle of the policy is useful but the content and evidence base it relies on is old.	Retain with updates to reflect latest policy, guidance and evidence
	H2 Affordable Housing	Moderate A review of major planning applications for residential schemes which have been granted permission since the adoption of the	The overall principle of the policy is useful. Further details on the spatial disposition of affordable units would be useful, particularly in light of the national challenges regarding Registered Providers	Retain with updates to reflect latest policy, guidance and evidence

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
		Local Plan in April 2020 has identified that most eligible schemes deliver 40% of affordable homes, except on some brownfield sites where viability is a barrier, as provided for by the policy. This is compliant with the NPPF 2024, paragraphs 61 – 66. However, the policy does detail requirements to address the needs of groups specified in the NPPF 2024, paragraph 63. Part of this requirements is addressed in policies H4 and H5.	taking on units. The policy should be informed by collaboration with the Housing team at the Council.  The policy would benefit from a clawback clause which would enable monitoring of the viability of the scheme at specific triggers.	
	H3 Rural Exception Sites	Strong  The policy is compliant with NPPF 2024 paragraphs 76, and 82 – 84, however the policy will need to incorporate community-led rural exception site.	The overall principal of the policy works however some of the wording could be more precise to help the DM team understand what evidence to look at when assessing proposals. Details on the proportion of affordable homes which would be acceptable and the type of financial tests to be applied would be useful.	Retain with updates to reflect latest policy, guidance and evidence
	H4 Specialist and Supported Accommodation	Strong  The policy is compliant with NPPF 2024, paragraph 63.	This policy will hopefully be changed as it was drafted as a result of a lack of site submitted for specialist and supported accommodation which triggered the need for a criteria-based policy. Further details would be needed on the relationship between SANG and SAMM contribution and specialist and supported accommodation. The wording and punctuation of the policy would need to be carefully looked at as it can lead to ambiguity.	Retain with updates to reflect latest policy, guidance and evidence
	H5 Gypsies, Travellers and	Weak	This policy was useful when it had weight, however the criteria may already be	Consider further if still needed – repeats

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
	Travelling Showpeople Sites	The general aim of the policy remains relevant, however the policy is out of date. This is because the main provision of the policy which was submit for Examination a Gypsy and Traveller Development Plan Document by January 2022. This was not done, which renders the whole policy out-of-date, as per the policy itself.	covered in the updated PPTS and would not need to be repeated in the policy.	national policy/ guidance
	H6 Internal Space Standards for New Homes	Strong The policy does not prescribe standards in itself and acts as a policy hook for national standards to be applied.	This is a useful policy which is heavily used by the team. It could be combined with another policy, such as GEN1.	Retain with updates to reflect latest policy, guidance and evidence
Economic Development	ED 1 New Employment	Moderate The policy is in principle still compliant with the NPPF, paragraphs 85-86. However, the policy lacks details on provisions for storage and distribution operations (NPPF 2024, paragraph 87) as well as mention of infrastructure required to support employment growth (NPPF 2024, paragraph 86 and 87).	Although not heavily used due to the type of development coming forward in Hart, this policy is useful. The policy should address the uses which have been emphasised in the NPPF, particularly storage and distribution.  The provision on skills and training could be further specified and officers would welcome guidance on it.	Retain with updates to reflect latest policy, guidance and evidence
	ED2 Safeguarding Employment Land and Premises (B-Use Classes)	Moderate The policy is in principle still compliant with the NPPF, paragraphs 85-86. However, the policy lacks details on provisions for storage and distribution operations (NPPF 2024, paragraph 87) as well as mention of infrastructure required to support employment growth (NPPF 2024, paragraph 86 and 87).	The policy has lost some of its effectiveness due to the Permitted Development Rights. The new policy would need to review the current uses on the business park, establish new boundaries and apply an article 4 direction where it would like to truly safeguard employment uses.	Retain with updates to reflect latest policy, guidance and evidence. Add guidance on uses which have gained emphasis in NPPF.

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
	ED3 The Rural Economy	Strong The policy is in principle compliant with NPPF 2024 paragraph 88.	The policy could be further clarified on the terms used within the policy and on what would be considered a suitable rural enterprise or use.	Retain with updates to reflect latest policy, guidance and evidence
	ED4 Town, District and Local Centres	Strong Policy is compliant with paragraphs 96 and 98 of the NPPF 2024 on planning healthy, inclusive and safe places and guard against the loss of valued facilities and services within communities.	This policy is useful and should be retained once updated with new evidence.	Retain with updates to reflect latest policy, guidance and evidence
	ED5 Fleet Town Centre	Strong Policy is compliant with paragraphs 96 and 98 of the NPPF 2024 on planning healthy, inclusive and safe places and guard against the loss of valued facilities and services within communities.	This policy is useful and should be retained once updated with new evidence. The policy should make sure to give a hook to Neighbourhood Plans.	Retain with updates to reflect latest policy, guidance and evidence
	ED6 District and Local Centres	Strong Policy is compliant with paragraphs 96 and 98 of the NPPF 2024 on planning healthy, inclusive and safe places and guard against the loss of valued facilities and services within communities.	This policy is useful and should be retained once updated with new evidence. The policy should make sure to give a hook to neighbourhood plans.	Retain with updates to reflect latest policy, guidance and evidence
The Natural, Build and Historic Environment	NBE1 Development in the Countryside	Strong Policy is compliant with parts of the NPPF 2024 that relate to the Natural Environment, notably paragraph 187 and 188. Clear guidance on what development proposals will be supported.	This policy is used a lot and should be retained. While updating the policy, a review of several of the details would make the policy more effective, including how to permit outbuildings or agricultural uses which are not covered by Permitted Development Rights, the meaning of 'appropriate use', the fact that the criteria can be interpreted as being mutually	Retain with updates to reflect latest policy, guidance and evidence

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
			exclusive and the need to amend criteria m) in light of the latest NPPF changes.	
	NBE2 Landscape	Strong Policy is compliant with paragraphs 187 and 192 of the NPPF 2024 which outline the requirement to protect and enhance valued landscapes, and sites of biodiversity or geological value. Additionally, policy requires proof that developments will not have an adverse impact on important local, natural and historic features, compliant with paragraphs 11.	The principle of the policy is very useful but relies on evidence which is quite old and will need updating.	Retain with updates to reflect latest policy, guidance and evidence
	NBE3 Thames Basin Heaths Special Protection Area	Strong Policy remains compliant with the Thames Heaths Special Protection Area.	Used very frequently, no issues identified.	Retain. with updates to reflect latest policy, guidance and evidence
	NBE4 Biodiversity	Strong Policy is compliant with paragraph 187 and 192 of the NPPF 2024 by ensuring that development will not have an adverse effect on biodiversity and that opportunities to enhance biodiversity are taken.	Vague – ‘where possible’ term used for net gain, to be clarified now that Environment Act 2021 makes net gain mandatory. Details such as site thresholds etc. may be covered by NDMP.	Retain with updates to reflect latest policy, guidance and evidence
	NBE5 Managing Flood Risk	Weak Policy is somewhat compliant with paragraphs 170, 171 & 172 of the NPPF, though updates to the NPPF 2024 in terms of flood risk assessment are not reflected.	Needs updating in light of national policy changes to NPPF, PPG and new SFRA. It would be helpful if the new policy clarified when an applicant needs to submit an FRA.	Retain with updates to reflect latest policy, guidance and evidence
	NBE6 Water Quality	Strong Policy is compliant with paragraphs 187 of the NPPF 2024 which stipulates that planning policy	Not used very often but useful in principle.	Retain with updates to reflect latest policy, guidance and evidence

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
		should ensure that new and existing developments do not pose a significant risk to local environmental conditions such as water quality.		
	NBE7 Sustainable Water Use	Strong Policy is within the maximum Water Efficient Standard (125 litres per person) as part of the Part G Building Regulations.	Never really used because difficult to enforce. May have been superseded by building regulations as well.	Consider further if still needed – repeats national policy/ guidance/ regulations
	NBE8 Historic Environment	Strong Policy is compliant with paragraphs 207 and 208 of the NPPF 2024 outlining the requirements to enhance and protect heritage assets, as well as having appropriate assessments of the assets that may be affected by a proposal.	The NPPF asks for a heritage strategy and the second paragraph of the policy may go beyond the NPPF.	Retain with updates to reflect latest policy, guidance and evidence
	NBE9 Design	Weak/Moderate Policy is detailed but doesn't specify the use of the National Design Guide and National Model Design Code which are being introduced nationally (paragraph 134 NPPF 2024). Reference to a new Hart Design Code may be mandatory.	Could be merged with some parts of the saved policy GEN 1 e.g. amenity. Need private amenity space and distance guidelines between dwellings e.g. 23m. Want a design guide mainly for householder applications e.g. subservience of extensions. Criteria i) and j) are vague around energy efficiency / climate change	Retain but requires a comprehensive re-write or update to reflect latest policy, guidance and evidence
	NBE10 Renewable and Low Carbon Energy	Weak The policy is partially compliant with paragraph 165 of the NPPF 2024 and not compliant with national policy on windfarms.	The policy needs to include battery storage and be clearer about uses being allowed in the countryside. Clarification on the treatment of cumulative impacts on landscape would be useful.	Retain with some re-write to include additional requirements from NPPF 2024.



	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
	NBE11 Pollution	Strong Policy is compliant with paragraphs 196 & 198 of the NPPF 2024, ensuring that a site is suitable for its proposed use and will not cause inappropriate noise, light or environmental pollution.	Policy is used especially for noise and commercial development Could be amalgamate with GEN6 (noisy and unneighbourly developments)?	Retain with updates to reflect latest policy, guidance and evidence
Infrastructure	INF1 Infrastructure	Moderate Policy is reflective of paragraph 26 of the NPPF 2024, whereby, where required to make otherwise unacceptable development acceptable, development proposals must make appropriate provision for infrastructure. The policy needs to be updated to reflect the fact that a CIL charging schedule was never brought into force.	Policy principle is good, but the policy lacks the detail to implement it effectively to justify/secure contributions in some areas.	Retain with updates to reflect latest policy, guidance and evidence
	INF2 Green Infrastructure	Strong Policy is compliant with paragraphs 164 of the NPPF to protect and enhance green infrastructure.	This policy is used it but needs a clearer trigger. It also needs better input from internal consultees and projects worked up to better calculate and justify contributions. Better collaboration/ contribution from Parishes required.	Retain with updates to reflect latest policy, guidance and evidence
	INF3 Transport	Moderate Policy is compliant with paragraph 110 & 111 of the NPPF 2024 and prioritises the transition to sustainable transport solutions, offering a range of modes for all potential users. However, the plan will need to have a more vision-led approach to identify transport solutions as specified in paragraph 109 of the NPPF 2024.	Policy is used and useful but would need better associated guidance to help implement the policy whether parking standards, boardwalk accessibility, servicing etc.	Retain with some re-write to include additional requirements from NPPF 2024.

	Hart Local Plan Policy	Compliance with national policy	Development Management team feedback on policy	Action
	INF4 Open Space, Sport and Recreation	Strong Policy is compliant with paragraph 104 of the NPPF 2024 that suggests open space must not be built on unless an assessment has been undertaken and clearly shows the need and if the loss of space would be replaced by better or equivalent provision in a suitable location.	Evidence needs to be reviewed and an open space calculator to identify developer contribution would be very helpful.	Retain with updates to reflect latest policy, guidance and evidence
	INF5 Community Facilities	Strong Policy is compliant with paragraph 98 of the NPPF 2024 where community facilities are supported by and integrated into new developments. Additionally, any loss of community space will be suitably replaced.	Useful but needs a review of the definition of 'community facility' e.g. retail/pubs mentioned in para 369 but not in glossary definition	Retain with updates to reflect latest policy, guidance and evidence
	INF6 Broadband and Successor Services	Moderate Policy is supportive of delivering high speed broadband connectivity.	Unsure whether this policy is necessary as PD exist for service providers.	Consider further if still needed
	INF7 Phoenix Green Flood Alleviation	Strong Policy is compliant with paragraphs 96 and 98 of the NPPF 2024 on planning healthy, inclusive and safe places and guard against the loss of valued facilities and services within communities.	The need for this policy needs to be reviewed in light of progress and new evidence.	Consider further if still needed
	INF8 Safeguarded Land for Education	Strong Policy is compliant with paragraphs 96 and 98 of the NPPF 2024 on planning healthy, inclusive and safe places and guard against the loss of valued facilities and services within communities.	The need for this policy needs to be reviewed in light of progress and new evidence.	Consider further if still needed

### 4.3 Evidence base

The existing evidence base studies were mostly developed to support the adopted Local Plan and the vast majority will require updating. Table 5 presents the list of current evidence base studies and whether they will require an update or will need to be reviewed by a specialist to check they are fully aligned with the latest policy and guidance and use the most recently published data sets.

**Table 5 Existing evidence base studies and their status**

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
<b>Housing and economy</b>					
November 2016	Housing	Strategic Housing Market Assessment	This Strategic Housing Market Assessment (SHMA) was prepared for Hart, Rushmoor and Surrey Heath Councils to determine the objectively assessed housing need for the Housing Market Area from 2014 to 2032. The study identified worsening affordability in both home ownership and the private rented sector, particularly for younger households, and applied a 15% uplift to demographic projections to reflect suppressed household formation. It concluded that 1,200 homes per year were required to support household growth, meet affordable housing needs, and sustain the local labour supply. The SHMA estimated an annual need for 380 additional affordable rented homes and identified over 2,000 households who could not afford to buy but were ineligible for traditional affordable housing.	Hart, Rushmoor and Surrey Heath Councils	Update required Given the age of the SHMA and the introduction of a new standard method for Local Housing Need updated assessment is required.
June 2021	Housing	Specialist Housing for Older People	This report, commissioned by Hart District Council and produced by the Housing Learning and Improvement Network (LIN), reviews the continued relevance of the 2016 SHMA figures on specialist accommodation for older people. It responds to recent development pressure by reassessing	Hart District Council	Update required This report provides a more recent assessment of estimated need for specialised housing and accommodation for older people in place of the estimates in the 2016 SHMA,

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
			<p>local need using updated demographic data.</p> <p>The study finds the SHMA overstates demand for sheltered and residential care but understates need for extra care housing. It recommends using the new figures as a more accurate basis for planning decisions and advises a steady delivery of provision to avoid market saturation.</p>		however, due to changes in Local Housing Need, the study needs updating.
October 2024	Housing	Social and Affordable Rent Affordability Assessment	<p>This study supported Hart District Council's development of a Supplementary Planning Document on affordable housing mix. It assessed the relative affordability of Social Rent, Affordable Rent, and Private Rent for households in housing need. The findings showed that Social Rent was more affordable than Affordable Rent for benefit-reliant households, particularly larger families affected by benefit caps. Around half of those on Hart's Housing Register could not afford Affordable Rents, and affordability issues were most severe in the private rented sector. The evidence supports prioritising Social Rent within future policy.</p>	Hart District Council	<p>Update required</p> <p>Minor updates to account for any changes in the datasets used for the analysis.</p>
September 2024	Housing	Impact of Social Rented Homes on Development Viability	<p>This study tested the viability of delivering social rent instead of affordable rent on typical development sites in Hart. It found social rent was viable on greenfield sites and most brownfield sites without SANG and SAMM costs, but often unviable where those costs applied. Rural Exception Sites and older persons housing on greenfield land were marginally viable,</p>	Hart District Council	<p>Planning Practice Guidance on viability was updated in December 2024, following the release of this study.</p> <p>Specialist review required to check still aligned with policy and guidance. May also require minor updates to account for any changes in</p>

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
			while brownfield versions required subsidy. Registered Providers supported social rent in principle but emphasised the need for clear policy wording in the SPD and section 106 agreements to ensure delivery.		the data sets used for the analysis.
March 2020	Housing	Gypsy and Traveller Accommodation Assessment	This assessment updated Hart's evidence on Gypsy, Traveller, and Travelling showpeople accommodation needs from 2020 to 2034. It identified a need for 23 pitches for households meeting the planning definition, and up to 2 for undetermined households. For Travelling showpeople, 5 plots were needed. No new transit provision was recommended, though ongoing monitoring was advised.	Hart District Council	Update required Planning Practice Guidance on policy for traveller sites was updated in December 2024. Most notably, this included a revised definition of Gypsies and Travellers. This among other updates will require the assessment to be revisited.
November 2016	Economy	Employment Land Review	This joint review assessed employment land needs in Hart, Rushmoor and Surrey Heath from 2014 to 2032. It found a resilient local economy with strong inter-area linkages and a balanced supply of employment land, though office space significantly outweighed industrial supply. While office vacancy was high, industrial space was limited. The study highlighted competition from nearby business parks and recommended ongoing planning to align employment land supply with economic growth and emerging sector needs.	Hart, Rushmoor and Surrey Heath Councils	Update required Beyond the significant changes to labour market dynamics following Brexit, the COVID-19 pandemic and government policy shifts, wider changes also require this assessment to be revisited (e.g. changes in Use Classes, the introduction of the 2023 Hart Corporate Plan 2023-2027, etc.).
2015	Economy	Retail, Leisure and Town Centres Study (Part 1 & 2)	This Study comprises two separate parts. Part 1 addresses the joint development needs of the two local authorities for retail, leisure and town centre uses. Part	Rushmoor Borough Council and Hart District Council	Update required Retail and leisure market dynamics have changed significantly following Brexit, the COVID-19 pandemic and

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
			2 provides an audit and review of the existing centres within the two separate authorities, as well as identifying the capacity of centres to accommodate the new town centre development requirements. Part 1 makes recommendations and conclusions on meeting shopping needs in Rushmoor and Hart, floorspace projections and future strategy implementation/monitoring.		government policy shifts. This study should be revisited to reflect current demand patterns.
<b>Infrastructure</b>					
July 2017	Infrastructure	Green Infrastructure Strategy	This strategy sets out a framework for enhancing green infrastructure to support the emerging Local Plan. It identifies six priority location-based projects and seven district-wide initiatives, focusing on themes such as biodiversity, climate resilience, health, and access to green space.	Hart District Council	Update required National policy changes related to green infrastructure include the requirement for a Biodiversity Net Gain of 10% for new developments (2024).
October 2016	Infrastructure	Open Space Study	This study assessed the quality, quantity, and accessibility of open spaces across Hart to inform Local Plan policies and guide developer contributions. It identified typologies, provision standards, and gaps in accessible green space, with particular focus on areas such as natural green space to mitigate pressure on the Thames Basin Heaths SPA. The study supports coordinated land management and strategic investment in open space and recreation infrastructure.	Hart District Council	Update required Paragraph 103 of the NPPF outlines that open space planning policies should be up to date, suggesting that this 9-year-old study should be updated.
July 2016	Infrastructure	Playing Pitch Strategy	This Playing Pitch Strategy provided an evidence-based assessment of current and future needs for sports pitches and	Hart District Council	Update required



Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
			<p>facilities. Prepared using Sport England's methodology.</p> <p>The strategy addressed projected population growth, housing development, and cross-boundary pressures, ensuring sport and leisure infrastructure can meet demand.</p>		The Playing Pitch Strategy (Section 4.2) is aligned with the NPPF guidance (Paragraph 104). However, paragraph 103 NPPF outlines the need for up-to-date assessments on open space and recreation facilities, suggesting that an update to this 9-year-old study is required.
April 2016	Infrastructure	Built Facilities Strategy	This strategy assesses indoor sports facility needs in Hart to 2032. It identifies current shortfalls and sets out priorities for investment, supporting Local Plan growth. Key projects include upgrades to Hart and Frogmore Leisure Centres to maintain high-quality, accessible provision.	Hart District Council	<p>Partial update required</p> <p>Paragraph 103 of the NPPF outlines that open space, recreation and sport facilities policies should be up to date, suggesting that this 9-year-old study should be updated. Upgrades have been made at identified locations (£350,000 transformation at Frogmore Leisure Centre, and similar upgrades to Hart Leisure Centre last year) since the last strategy, suggesting a review of the programme of improvements should be considered.</p>
2016	Infrastructure	Open space, sport and recreation study and playing pitch strategy overview report	This overview report summarises Hart's strategy for meeting current and future needs for open space, sport, and recreation facilities to 2032. It draws on three supporting studies and highlights investment priorities for built facilities, pitches, and open spaces.	Hart District Council	<p>Update required</p> <p>The NPPF requires up-to-date assessments of open space, sport and recreation needs and a new Local Plan may require a more recent assessment of this strategy.</p>
<b>Built environment</b>					

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
2010	Housing	Urban Characterisation and Density Study	The Hart Urban Characterisation and Density Study provides a detailed analysis of the built form, layout, and density of Hart's six main settlements: Fleet, Hook, Yateley, Hartley Wintney, Odiham, and Blackwater. High-sensitivity areas were flagged for careful design consideration.	Hart District Council	Update required Policy recommendations in this study should be revisited to reflect changes in the characterisation and density of Hart's six main settlements since 2010. This update could be incorporated as part of the newly required Design Code.
2023/4	Housing	Settlement Capacity and Intensification Study	This study evaluated the potential for regeneration, brownfield renewal, and overall development intensification within the district's settlements. The study focused on identifying opportunities within existing settlement boundaries, rather than expanding into the surrounding greenfield sites.	Hart District Council	No update required. The NPPF expects planning policy to promote an effective use of land in meeting the need for homes selecting land that may be suitable in meeting development needs. This study is sufficiently up-to-date and can guide future planning policy.
February 1999	Heritage	Historic Landscape Character Assessment	This assessment mapped the historic character of Hampshire's landscape to support planning, conservation, and development control. Using a desk-based GIS approach, it identified how past land use and settlement patterns have shaped the present-day countryside.	Hampshire County Council	No update required. Historic Landscape Character is unlikely to have change much since 1999. Any significant changes likely to affect the plan can be picked up in the site level heritage assessments.
N/A	Heritage	Conservation Areas Management Plans	There are currently 32 identified conservation areas in Hart. Relevant management plans and character assessments have been prepared for each of these designated areas. Templates and guidance are provided for Parish and Town councils in preparing or	Hart District Council	No update required. Conservation Area Management Plans are prepared by Parish and Town Councils and it is not envisaged that they form part

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
			updating appraisals and management plans.		of the preparation for the Local Plan.
<b>Natural environment</b>					
March 2010	Environment	North Hampshire Renewable Energy and Low Carbon Development Study	This study provided an evidence base for Hart, Basingstoke and Deane, and Rushmoor to support local policies on sustainable construction and renewable energy. It identified renewable energy targets for each authority by 2020 and recommended new policies on energy efficiency in existing homes, carbon emissions mitigation, and sustainable building standards. The study also included a water use evidence base and emphasised the need for decentralised, low-carbon energy and implementation of an Energy Opportunities Plan.	Hart, Basingstoke, Deane and Rushmoor Councils	Targets are for 2020 and therefore study considered dated. However, Building Standards have evolved since 2010 and further changes to the Part 6, Part L and Part F of the Building Regulations are proposed to address energy consumption <sup>20</sup> . On this basis it is judged unnecessary to update this evidence base for the new Local Plan and it is suggested it is deleted from the evidence base.
April 1997	Landscape	Landscape Assessment	This assessment provided a detailed appraisal of Hart's landscape character to guide countryside planning and management.  It identified most of the district's landscapes as being of high or fair quality, with only a few areas classed as degraded. The best landscapes included enclosed chalkland, historic parkland, heathland, and parts of the Whitewater valley. Lower-quality areas were associated with quarries, airfields, and intensively farmed arable land. The study supports targeted conservation and	Hart District Council	Update required Some of the content in this assessment remains relevant (geology, history of human influence, etc.), however the assessment dates back to 1997 and it is likely that a number of changes have occurred in the landscape of Hart in the last 30 years. In addition, the approach to landscape assessment has changed over this period and the LCA guidance from

<sup>20</sup> *The Future Homes and Buildings Standards: 2023 consultation*. (n.d.). GOV.UK. Retrieved 9 July 2025, from <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
			enhancement and encourages local design guidance through parish-level assessments.		Natural England suggests that virtually all LCA predating the 2022 LCA guidance would need to be reviewed. <sup>21</sup>
2016	Landscape	Hart Landscape Capacity Study	This study was produced to inform Hart Local Plan and assess the relative capacity of the landscape to accommodate development in the rural areas of the district, outside of the established settlement boundaries.	Hart District Council	Update required The baseline for this study is the 1997 Landscape Character Assessment, which needs to be updated. The study provides an assessment of the whole landscape in Hart, however, it focuses mostly on areas which were identified of interest in the SHLAA. These are likely to change in the new Local Plan.
March 2010	Landscape	Integrated Character Assessment	<p>This assessment updated Hampshire's landscape, townscape, and seascape character evidence to support land-use planning across the county.</p> <p>It integrated urban and rural analysis in line with the European Landscape Convention, using enhanced GIS and local datasets.</p> <p>The study introduced a consistent framework for describing character areas, covering features such as layout, materials, topography, biodiversity, and public realm. It supports Local Plans, green infrastructure planning, and development control.</p>	Hampshire County Council	No update required. Integrated Landscape Character is unlikely to have change much since 2010. Any significant changes likely to affect the plan can be picked up in the site level landscape assessments.

<sup>21</sup> An Approach to Landscape Character Assessment, October 2014, Christine Tudor, Natural England

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
December 2016	Flood risk	Strategic Flood Risk Assessment	This Strategic Flood Risk Assessment, prepared by Hart District Council, provided an evidence base to inform Local Plan preparation and development management decisions. It identifies key sources of flood risk in the district, including fluvial, surface water, sewer, groundwater, and artificial sources. It incorporated the national guidance, datasets, and modelling to ensure effective, sustainable flood risk management across Hart.	Hart District Council	Update required Revisions to national policy (Planning Practice Guidance on how to prepare a strategic flood risk assessment) and to the EA baseline datasets mean that a full update of this evidence base is required.
October 2020	Flood risk	Addendum regarding Surface Water Indicative Flood Problem Areas	This addendum to the 2016 Strategic Flood Risk Assessment explains Hart District Council's decision to redefine Surface Water Indicative Flood Problem Areas using the Updated Flood Map for Surface Water (uFMfSW) 1 in 1000 extent, instead of the previous 1 in 200 FMfSW data.  The change was made to align with Environment Agency mapping tools, enable online publication, and reflect negligible performance differences between the datasets. The updated approach supports better identification of surface water flood risk in planning decisions.	Hart District Council	Update required A new Risk of Flooding from Surface Water (RoFSW) map was published by the Environment Agency in January 2025. Therefore, the areas at risk should be revisited.  <a href="#">Risk of Flooding from Surface Water   DEFRA</a>
January 2018	Flood risk	Strategic flood risk assessment sequential test	This document supports the Hart Local Plan by demonstrating that the Sequential Test has been applied to proposed housing and employment site allocations in accordance with national flood risk policy.	Hart District Council	Update required As stated by Planning Practice Guidance, the Sequential Test needs to be prepared alongside the development of the Council's spatial strategy and site allocations and will need to

Date	Topic	Title	Description	Commissioning / issuing authority	Update required?
					be fully updated to reflect the new Local Plan.
February 2018	Flood risk	Exception test	This Level 2 SFRA assessed three Local Plan sites to ensure they meet the Exception Test for flood risk. It confirmed that development can be safely accommodated within lower-risk areas on each site, provided mitigation is applied. Site-specific Flood Risk Assessments will still be required to confirm compliance with Flood Risk Policy NBE6.	Hart District Council	Update required As above, the Exception Test should be applied at the Local Plan preparation stage where development is allocated in medium or high-risk areas following the application of the Sequential Test.



## 4.4 Documents and data

As part of the Policy and Economic Development Team business-as-usual work, a number of data sets and documents are produced (Table 6). None of these will require updating for the new Local Plan per se, although there will be other factors including regulatory requirements that will necessitate updates over the plan production period. That being said, some of these data sets will be helpful for the Local Plan workstreams moving forward and time for their production / updates has been included within the assumptions made regarding resourcing.

**Table 6 Documents and data**

Date	Topic	Title	Description	Update required
N/A	Land	Brownfield Land Register, December 2024	<p>A brownfield land register identifies previously developed sites considered to be appropriate for residential development. It is not a complete list of all brownfield land in the district.</p> <p>To be on the register sites must meet specific criteria set out in the Town and Country Planning (Brownfield Land Register) Regulations 2017:</p> <ul style="list-style-type: none"> <li>• a site area of at least 0.25 hectares or capable of supporting at least 5 dwellings</li> <li>• is suitable for residential development</li> <li>• is available for residential development</li> <li>• residential development of the land is achievable within 15 years of entry onto the register</li> </ul>	On-going updates required
N/A	Land	Self and custom build register	This registers people/associations who are seeking plots of land for self-build/custom-build housing. It helps track demand for these types of homes, and if registered, the council are able to inform interested parties if suitable sites become available.	On-going updates required
April 2024	Housing	Five-year Housing land supply and trajectory	Under the National Planning Policy Framework 2024 (NPPF) local planning authorities should demonstrate each year that they have at least five years' worth of housing supply against their housing requirement. The absence of a five-year land supply would trigger the presumption in favour of sustainable development at NPPF paragraph 11. This paper demonstrates that the Council does have a five-year housing land supply at 1st April 2024 with a surplus of 582 homes over the next five years.	<p>On-going updates required</p> <p>The five-year housing supply is currently compliant with NPPF requirements.</p>

Date	Topic	Title	Description	Update required
December 2023	Housing	Housing Delivery Test	The housing delivery test must be submitted to MHCLG on an annual basis. The government's housing delivery test is a percentage measurement of the number of net homes delivered in an area against the number of homes required. It covers a rolling three-year period. The delivery test measurement for Hart 2022 was 207%, meaning 1,746 homes delivered in Hart against a requirement of 842.	Annual update required.
December 2024	Governance	Authority Monitoring Report	The Authority Monitoring Report (AMR) tracks implementation of the Hart Local Plan (2032), progress on neighbourhood planning, and Duty to Cooperate activity. Covering April 2023 to March 2024, it provides updates on housing, the economy, infrastructure, the environment, and community assets.	Annual update required. Planning authorities are required to publish an Authority Monitoring Report (AMR) each year. This AMR covers the period 1 April 2023 to 31 March 2024.
October 2024	Infrastructure	Infrastructure Funding Statement	The Infrastructure Funding Statement (IFS) presents information on developer contributions secured through section 106 planning obligations. It includes information on contributions secured, received, allocated or spent in the reporting year 1 April 2023 to 31 March 2024.	Annual update required

## 5. New Local Plan

### 5.1 Project objectives

The new Local Plan will need to respond to:

- The National legislative framework for plan making, and national policy and guidance. In particular the reformed faster paced plan making system that is in the process of being introduced (as discussed in section 2).
- The Corporate Priorities of the Council, around people, planet and place, all of which have direct implications for a Local Plan that is concerned with the use of land (as discussed in section 3.3).
- The Council's climate emergency declaration (see section 5.4.4)
- Wider plans and strategies, including the Strategic Development Strategy (as discussed in sections 2.25 and 3.3).

In light of the LGR which is likely to be effective in May 2028, the Council still believes that the new Local Plan should be a corporate priority, to leave an updated blueprint for the area that will guide development until such time that a new Local Plan for the new unitary authority is prepared.

### 5.2 Scope

#### *Local Plan*

National policy requires the Council to review its Local Plan every five years. The 2020 Local Plan was reviewed in 2024 by the Council<sup>22</sup>. The review concluded that, in light of significant changes in national policy, the Local Plan required an update (see section 4.1).

The new Local Plan will set a vision, objectives and policies for the management of land use and development in Hart District and will guide infrastructure investment. Under the new plan-making framework, LPAs will need to be covered by a single plan<sup>23</sup> and the Local Plan will need to cover strategic and non-strategic matters<sup>24</sup>.

Government has announced that it “*remains committed to introducing a new, faster and clearer process for preparing plans*”. Few details have been shared on these proposals beyond the 30-month timeframe for the preparation of plans. Government has announced measures such as the standardisation of planning data, the use of more powerful planning tools to collate and process consultation responses and the use of templates to speed up part of the plan-making process. Additional guidance will set clear expectations for preparing evidence base. Together with standardisation of data and additional measures, government expects this to reduce the amount of evidence required to prepare plans. However, details of these proposals are yet to be published. The scope of the new Local

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<sup>22</sup> Hart District Council, Cabinet, 2 January 2025 Item 68: Assessment of the Hart Local Plan (Strategy & Sites) 2032. <https://hart.moderngov.co.uk/documents/s11177/Cabinet%20report%20Local%20Plan%20Review.pdf>

<sup>23</sup> Levelling Up and Regeneration Act, section 15C

<sup>24</sup> NPPF 2024, paragraphs 17 and 18

Plan has been derived to address current and known future legal requirements and should be reviewed following further announcements from government.

The precise scope of the Local Plan will also be dependent on the scope of the NDMP, which are due to be published before the end of 2025. They will cover decision-making matters for the whole of England and will not need to be repeated in the Local Plan. However, policies qualifying the NDMP policies for the Hart local context may be appropriate.

Table 7 presents the existing Hart Development Plan Documents that constitute the planning policy framework. They set the overall vision, objectives and policies to guide development in the district. They consist of documents which have been prepared by Hart District Council, Hampshire County Council and Neighbourhood Plan groups. The new Local Plan is proposed to fully replace the existing Local Plan, including the saved policies from the 2002 plan. The only exception will be saved Policy NRM6: Thames Basin Heaths Special Protection Area of the South-east plan (adopted May 2009) which will continue to be saved. All documents other than the Hart Local Plan, including the Neighbourhood Plans, will be retained, unless updated separately to the Local Plan.

**Table 7 Hart District Council adopted Development Plan**

Document	Purpose	Adoption / Made Date
Hart Local Plan (Strategy and Sites) 2032 Hart Local Plan: Strategy and Sites 2016 - 2032 Policies Map	Sets out the overall vision, objectives and policies to guide future development in the District over the plan period 2014-32	April 2020
Saved policies from the Hart Local Plan (replacement) 1996-2006	This document sets out those policies from the Hart District Local Plan (Replacement) 1996-2006 (adopted 23 December 2002) that continue to remain saved following adoption of the Hart Local Plan (Strategy and Sites) 2032	May 2020
Crondall Parish Neighbourhood Plan (2017-2032)	These Neighbourhood Plans form part of the Development Plan for Hart.  Neighbourhood Plans carry statutory weight, meaning they must be considered when determining planning applications. They provide a more localised approach to planning, ensuring that development aligns with the community's vision while still fitting within the broader strategic framework of the local plan	May 2021
Crookham Village Parish Neighbourhood Development Plan (2016-2032)		May 2021
Dogmersfield Parish Neighbourhood Plan (2016-2032)		September 2019
Fleet Neighbourhood Plan (2018-2032)		November 2019
Hartley Wintney Neighbourhood Plan (2017-2032)		November 2019
Hook Neighbourhood Plan (2018-2032)		February 2020
Odiham and North Warnborough Neighbourhood Plan (2014-2032)		April 2025
Rotherwick Neighbourhood Plan (2016-2032)		December 2016
Winchfield Neighbourhood Plan (2022-2037)		January 2024
Yateley, Darby Green & Frogmore Neighbourhood Plan (2020-2032)		July 2022
Hampshire Minerals and Waste Plan	The plan explains how mineral resources should be extracted and supplied as well as the necessary waste management infrastructure needed so that Hampshire's environment will be protected, its communities maintained and the local economy supported.	October 2013
South East Plan 2009 Policy NRM6: Thames Basin Heaths SPA of the South East Plan Areas in Hart affected by the SPA	This document set out the long-term spatial planning framework for the region for the period 2006-2026. In 2013, it was revoked, apart from policy NRM6 related to the Thames Basin Heaths Special Protection Area. This policy regulates new residential development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths SPA.	2009

### Supplementary Planning Documents

The Council currently also have a number of Supplementary Planning Documents (SPDs) (Table 8). Under the new plan making system, these will no longer exist as an option and on adoption of the new Local Plan will cease to have effect. Therefore, as set out in the Government's plan making reform consultation<sup>25</sup>, in scoping the Local Plan, it will be necessary to consider whether the advice and guidance is still relevant and if so, whether it should be revised and re-published as guidance or integrated into the new style local plan. Government has not yet made it clear whether Supplementary Planning Guidance, the pre-cursor to SPDs, will also be affected by these changes.

**Table 8 Supplementary Planning Documents**

Document	Purpose	Date
Affordable Homes in New Development SPD	Provides guidance on the provision of affordable homes when preparing a planning application.	March 2025
Cycle and Car Parking in New Development SPD	Provides guidance on the provision of cycle and car parking with new development that requires planning permission (including development/changes of use of existing buildings).	December 2023
Viability Appraisals for New Development SPD	Sets out the Council's approach to financial viability assessments in support of planning applications. It has been prepared to support Policies H2 Affordable Housing and INF1 Infrastructure in the Hart District Local Plan (Strategy and Sites) 2032.	November 2023
Yateley Village Design Framework SPD	The VDF has three primary objectives: to serve as a framework to guide future development in Yateley centre; to establish a basis for attracting funding for environmental improvements; and to act as a catalyst to promote development and improvements.	June 2009
Illuminated Advertisements Supplementary Planning Guidance	A policy on the control of the level of illumination of signs, in those cases where illuminated signs are considered to be acceptable.	September 1991

### Other planning guidance

The Council currently has a number of technical advice notes and other planning guidance published (Table 9). They do not constitute policy but are there to help applicants navigate local and national planning requirements. Following the publication of the NDMP and subsequent detailed scope of the Local Plan, these will need to be reviewed to consider whether they need to be retained.

**Table 9 Other existing Hart planning guidance**

Document	Purpose	Date
Affordable housing financial contributions calculator and technical advice note	This document sets out the Council's approach to calculating financial contributions to affordable housing using its Affordable Housing Financial Contributions Calculator.	November 2025

<sup>25</sup> [Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms - GOV.UK, paragraphs 202-205](#)



Document		Purpose	Date
<b>Biodiversity planning Technical Advice Note</b>		This Technical Advice Note (TAN) provides guidance on how to address biodiversity matters when preparing a planning application and sets out the information required in support of a planning application. This is not an adopted policy, but is guidance on how to help applicants meet requirements for biodiversity set out in legislation.	January 2024
<b>Installing Solar Equipment on Residential Buildings Technical Advice Note</b>		This document provides planning guidance on the installation of solar equipment (solar photovoltaic (PV) or solar thermal equipment) on residential Buildings.	Not specified
<b>Suitable Alternative Natural Greenspace – SANG</b>	Council owned/controlled SANG allocation criteria	This sets out the criteria against which the Council will consider an allocation of council-owned/controlled SANG capacity. HDC will not give priority for the allocation of council-administered or managed SANG to any development that does not meet the allocations policy.	November 2022
	SANG map and capacity	This document sets out: <ul style="list-style-type: none"> <li>the amount and availability of mitigation capacity at SANGs in Hart District at May 2024 (and is therefore subject to change).</li> <li>the locations of the SANGs and their catchments areas.</li> </ul>	May 2024
	SANG Tariff 2025/26	This document lists the tariffs applied to all developments mitigated by Council-owned or controlled SANGs (Suitable Alternative Natural Greenspace) for 2025/26	
	SANG Tariff 2024/5	This document lists the tariffs applied to all developments mitigated by Council-owned or controlled SANGs (Suitable Alternative Natural Greenspace) for 2024/25.	
	Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG)	This document describes the features which have been found to draw visitors to the SPA, which should be replicated in SANG. It provides guidelines on <ul style="list-style-type: none"> <li>the type of site which should be identified as SANG</li> <li>measures which can be taken to enhance sites so that they may be used as SANG</li> </ul>	August 2021
<b>Tariff for Strategic Access Management and Monitoring (SAMM)</b>		The SAMM tariff is on developers to contribute towards funding the ongoing management and protection of the SPA.	April 2025
<b>A positive approach to sustainable development guidance</b>		This document stipulates that the Council will take a positive approach in favour of sustainable development when considering development proposals.	November 2014

Document		Purpose	Date
<b>Planning Technical Advice Note - Privacy, Daylight and Sunlight: The 45 and 25 Degree Guideline</b>		This note explains the guidelines that will be used to assess the impact of a development upon privacy, daylight and sunlight.	November 2020
<b>Odiham Village Design Statement</b>		This Village Design Statement is intended to help householders and businesses when designing for change and applying for planning permission. It sets out the valued features/characteristics of the parish and is used as a material consideration in the determination of planning applications	January 2009
<b>Community Infrastructure Policy</b>	Planning Obligations (S106 Agreements) – Principles and Priorities	This document sets out requirements for new development in Hart. This is usually secured through S106 planning obligations, often in the form of financial contributions.	September 2014
	Hampshire School Places Plan 2025 - 2029	Among other policies, this sets out developer' contributions towards children's services facilities.	Not specified
	Transport Contributions Policy	The transport contributions policy calculates the level of contributions required for each development. This is dependent on the size and nature of the development proposal.	September 2007
	Hart Leisure Strategy - 2007-2017	Among other policies, this sets out developers' contributions towards leisure facilities.	October 2007 (set for review in 2012)

### *Statement of Community Involvement*

LPAs are currently statutorily required to prepare and maintain a Statement of Community Involvement (SCI) (Under Section 18 of the Planning and Compensation Act 2004, as amended by the Planning Act 2008, the Localism Act 2011, and the Neighbourhood Planning Act 2017). The SCI must be reviewed every five years.

The SCI formally sets out how the Council will involve local communities, business and other stakeholders in local planning decisions primarily the local plan and planning applications. Hart District Council's latest SCI was published in September 2021 to explain clearly:

- how the community will be involved;
- the stages at which that involvement will take place;
- the methods to be used in that involvement, and;
- a commitment to feedback the outcome of engagement with the community.

Once secondary legislation is enacted, the LURA (2023) removes the requirement to prepare an SCI and instead requires LPAs to set out their overall approach to engagement

and communication in their Project Initiation Document, which will be submitted for Gateway 1.<sup>26</sup>

If the secondary legislation to enact the plan making provision of the LURA is not made by 2026, it will be necessary for Hart to review its SCI in 2026, in line with Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended).

### **Local Development Scheme**

LPAs are currently under a legal obligation to prepare and maintain an up-to-date Local Development Scheme (LDS)<sup>27</sup>. The LDS must specify at minimum:

- The DPDs which are to be prepared by the LPA
- The subject matter and geographic area of each of those DPDs
- Which of those is to be prepared jointly, and
- The timetable to prepare these documents.

The latest LDS for Hart, the ninth revision, was published in May 2019. Once secondary legislation is enacted, the LURA (2023) removes the requirement to prepare a LDS and instead a Local Plan Timetable will need to be prepared.

## **5.3 Plan period**

National policy requires strategic policies to have to cover a minimum of 15 years ahead, from adoption. Policies which set a vision and guide development for larger scale developments such as new settlements will need to look ahead by 30 years:

*‘Strategic policies should look ahead over a minimum 15 year period from adoption<sup>14</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery’ (NPPF 2024, paragraph 22).*

The new Hart Local Plan will cover strategic policies and will consequently need to have a plan period of at least 15 years on adoption. To allow time for the development plan and examination of the plan, it is proposed that a 20 year-plan period is used. Should a new settlement be considered as part of the spatial strategy, the strategic policies governing the allocation will need to look ahead to 30 years in the future.

As explored in section 2.2.6, a 30-month timetable is proposed for Local Plan production. Assuming the secondary legislation for the plan making provisions in LURA is enacted in Autumn / Winter 2025 and preparatory work for a new Local Plan is completed within the same period, it is suggested that the Local Plan period is 2025-2045.

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<sup>26</sup> MHCLG, Plan making reforms: consultation on implementation, paragraphs 136-139, and MHCLG, Plan-making reforms: consultation on implementation response, paragraphs 112 - 113

<sup>27</sup> Planning and Compulsory Purchase Act 2004, section 15 (as amended by the Localism Act 2011)

## 5.4 Project deliverables

### 5.4.1 Local Plan

Given that the full details of the new plan making system have yet to be confirmed, it is not 100% certain what deliverables will be required. However, based on the information contained within the LURA 2023<sup>28</sup> and the Government's Consultation Reports<sup>29</sup>, Table 10 summarises the likely key deliverables / milestones and associated production processes for the new Local Plan, which underpin the assumptions made in the resource plan and budget.

The production of a new Local Plan under the new plan making framework is dependent on the introduction of secondary legislation by government. Notification of the start of the Local Plan process can only be made once this legislation is in place. Government has announced that policy / regulations for the new plan making framework will be published in the Autumn<sup>30</sup>. The timescales presented later in this document were based on this assumption, and on the assumption that a consultation on the content of the NDMP will be published later this year<sup>31</sup>.

**Table 10 Key deliverables / milestones and their likely content / production process, July 2025**

Key deliverables/ milestones	Likely content / production process
Notice to commence	<ul style="list-style-type: none"><li>- Notice to be published four months prior to the first gateway assessment.</li><li>- Notice to be accompanied by Local Plan Timetable</li><li>- Government intends to provide a template for the commencement notice.</li></ul>
Early engagement	<ul style="list-style-type: none"><li>- Early engagement to be undertaken during the scoping stage, i.e. prior to the 30-month process commencing. It should begin no later than when the notice to commence is published. The duration of this engagement will be discretionary.</li><li>- Local Planning Authority to notify stakeholders and invite early participation on matters that might shape the direction of the plan.</li><li>- Intention is that early engagement will be used to gather baseline information to inform the plan and seek views on plan-preparation activities undertaken within the scope stage (e.g. vision or approach to engagement). Precise content will be discretionary.</li><li>- Participants to engage will likely mirror those within existing Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, i.e. residents, businesses and statutory consultees. Proposal to extend this list to neighbouring authorities and any authority, that in the view of the local planning authority, may have an interest in the plan.</li></ul>

<sup>28</sup> <https://www.legislation.gov.uk/ukpga/2023/55/contents?p35442>

<sup>29</sup> MHCLG / DLUHC (2023) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/levelling-up-and-regeneration-bill-consultation-on-implementation-of-plan-making-reforms#detailed-summary>; MHCLG (2025) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/outcome/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation#introduction>

<sup>30</sup> Paragraph 184 of Government response to the proposed plan-making reforms: Consultation on implementation. (n.d.). GOV.UK. Retrieved 9 July 2025, from <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/outcome/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation>

<sup>31</sup> June 2025, T. P. 3. (n.d.). Pennycook: 'Major planks' of planning reform will be in place by end of year. Retrieved 9 July 2025, from [https://www.planningresource.co.uk/article/1920377?utm\\_source=website&utm\\_medium=social](https://www.planningresource.co.uk/article/1920377?utm_source=website&utm_medium=social) and paragraph 23 of Government response to the proposed plan-making reforms: Consultation on implementation. (n.d.). GOV.UK. Retrieved 9 July 2025, from <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/outcome/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation>

Key deliverables/ milestones	Likely content / production process
Local Plan Timetable	<ul style="list-style-type: none"> <li>- To be prepared during the scoping stage, i.e. prior to the 30-month process commencing, and to be published upon notification of the start of the Local Plan Process.</li> <li>- The Local Plan Timetable will include the matters the Local Plan is seeking to address, the geographical extent of the local plan, what (if any) Supplementary Plans will be prepared (as well of details of the subject matter, geographical areas, site or sites to which each supplementary plans relate), details on any joint working, how the authority seeks to implement its design code for the whole area, and a timetable for the Local Plan and any Supplementary Plans.</li> <li>- Key milestones should be set in the timetable for the commencement of Gateway 1, first mandatory consultation window, commencement of Gateway 2, second mandatory consultation window, commencement of Gateway 3, submission for independent Examination, and anticipated adoption date. Government has indicated that the list of milestones to be included will be expanded to capture the end-to-end process of preparing a Local Plan but no further detail available as of July 2025.</li> <li>- Data on the milestones will need to be made publicly available in a prescribed digital format and using specified data standards.</li> <li>- Government intends to provide a template for Local Plan Timetables.</li> <li>- The Local Plan Timetable will need to be updated upon completion of the first gateway assessment and no later than one month after any other defined milestone has been reached or missed. It will need to be revised at least once every six months, if upon review, it requires updating.</li> </ul>
Project Initiation Document (PID)	<ul style="list-style-type: none"> <li>- To be prepared during the scoping stage, i.e. prior to the 30-month process commencing.</li> <li>- The PID is intended to: <ul style="list-style-type: none"> <li>- Define the scope of the plan</li> <li>- Identify the time and resources needed to support its preparation</li> <li>- Establish support from elected Members on the main messages that will shape the strategy</li> <li>- Outline the overall ambitions and approach to engagement and consultation, including use of digital engagement tools, early engagement plans, resources and skills required, and approach to engagement with seldom heard groups.</li> </ul> </li> <li>- To be used as a tool to prepare for and evidence progress towards the first gateway assessment. Should continue to be used as a live tool throughout the plan making process.</li> <li>- Government intends to provide a template and publish a toolkit of guides and best practice examples.</li> <li>- No requirement to consult on PID but Government envisages that the PID (wholly or partially) will be used for engagement with internal and external stakeholders to secure buy-in for the plan and its proposed scope, approach and resourcing.</li> </ul>
Gateway 1 (Advisory)	<ul style="list-style-type: none"> <li>- Gateway 1 to be undertaken at the beginning of the 30-month process, following work undertaken during the scoping stage.</li> <li>- Whether an authority has met the policy expectation to prepare and adopt a plan in 30 months will be measured from this starting point.</li> <li>- The Local Plan Timetable should set out when Gateway 1 will commence. Relevant parties should be notified a minimum of four weeks prior to commencement. The gateway assessment should last no more than four weeks (up to six weeks in exceptional circumstances). Plan preparation should continue in parallel with the assessment.</li> <li>- Government intends to provide a template self-assessment form for use by the Local Planning Authority. This form will be focussed on assessing readiness to start the plan-making process. A toolkit of guidance will be available. The PID is</li> </ul>

Key deliverables/ milestones	Likely content / production process
	<p>intended to be a valuable tool to allow authorities to undertake the self-assessment.</p> <ul style="list-style-type: none"> <li>- Provisional topics for the assessment (TBC): <ul style="list-style-type: none"> <li>- Review of PID – plan scope; evidence required, project management, governance, delivery risks and resourcing; and overall approach to engagement with communities and stakeholders</li> <li>- Data and digital approach</li> <li>- Early scoping of SEA (and subsequent Environmental Outcome Report (EOR)) requirements</li> <li>- Scope of any locally specific development management policies</li> <li>- Headline position on delivering new homes based on the standard method and recent Housing Delivery Test (HDT) results and where possible, the high-level options to deliver development needs in the area</li> <li>- Headline positions on how plan will reflect the Local Nature Recover Strategy</li> </ul> </li> </ul>
Plan vision	<ul style="list-style-type: none"> <li>- Will be a legislative requirement for inclusion within Local Plan.</li> <li>- National policy will set out the principles to have regard to when preparing a vision.</li> <li>- Will need to be informed by baseline information and stakeholder inputs gathered through early participation</li> <li>- It will need to be supported by no more than ten measurable outcomes.</li> <li>- Government intends to provide a flexible template to support the drafting of a concise, locally specific and measurable vision.</li> <li>- Alignment with wider council corporate strategies will be desirable but absolute conformity is not required for a sound plan.</li> </ul>
First consultation	<ul style="list-style-type: none"> <li>- First consultation to take place following the first gateway assessment for a minimum of six weeks. The exact timing of the consultation to be discretionary.</li> <li>- Exact scope of consultation to be confirmed via regulations, however likely to focus on validating the vision and testing broad options for the plan, including the key spatial choices.</li> <li>- Government intends to use secondary legislation to identify the minimum documents and information that must be published for consultation; and to provide templates for the collection of consultation responses.</li> </ul>
Gateway 2 (Advisory)	<ul style="list-style-type: none"> <li>- Gateway 2 to be undertaken part-way through plan preparation, between the two mandatory consultation windows.</li> <li>- The Local Plan Timetable should set out when Gateway 2 will commence. Relevant parties should be notified a minimum of four weeks prior to commencement. The gateway assessment should last no more than four weeks (up to six weeks in exceptional circumstances). Plan preparation should continue in parallel with the assessment.</li> <li>- Assessment will be undertaken by PINS and will be subject to a fee</li> <li>- Prior to the Gateway, a short report detailing progress against key topics will need to be prepared. Government intends to provide a digital template to be used by the Local Planning Authority for the assessment.</li> <li>- When the report is submitted to the Inspector, this marks the formal commencement of the gateway.</li> <li>- The assessment will be focused on supporting early resolution of potential soundness issue, ensuring legal and procedural compliance and monitoring progress.</li> <li>- Provisional topics for the assessment (TBC): <ul style="list-style-type: none"> <li>- Progress against Project Initiation Document and programme</li> </ul> </li> </ul>



Key deliverables/ milestones	Likely content / production process
	<ul style="list-style-type: none"> <li>- Topic-specific advice based on planning authority and appointed person identified issues (around emerging plan and evidence)</li> <li>- Data and digital requirements (including policies map)</li> <li>- Progress with relevant SEA (and subsequently EOR) requirements</li> <li>- Engagement with communities and statutory bodies</li> <li>- Compliance with the requirement to have regard to certain matters, including any relevant Neighbourhood Priorities Statements</li> <li>- An interactive workshop day will be held with the Inspector to work through the issues identified and provide initial observations and advice.</li> <li>- Gateway 2 will be advisory; the Inspector will have no power to halt or delay the plan preparation process. However, the Local Planning Authority will be required to have regard to their observations and advice in preparing the plan.</li> <li>- The issue of the Inspector's Gateway 2 Report marks the formal end of the Gateway. The report must be published publicly as soon as it is reasonably practicable.</li> <li>- Where a particular body or organisation is identified in the Inspectors Report, the Local Planning Authority must notify that body at the same time as publishing the report to enable quick resolution of any identified issues.</li> </ul>
Second consultation	<ul style="list-style-type: none"> <li>- Second consultation to take place after the second gateway assessment for a minimum of eight weeks. The exact timing of the consultation to be discretionary.</li> <li>- Exact scope of consultation to be confirmed via regulations, however likely to focus on seeking views on the draft plan intended for examination submission.</li> <li>- Government intends to use secondary legislation to identify the minimum documents and information that must be published for consultation; and to provide templates for the collection of consultation responses.</li> </ul>
Gateway 3 (Stop/Go)	<ul style="list-style-type: none"> <li>- Gateway 3 to be undertaken following the second mandatory consultation window when submission of the plan for independent examination is planned.</li> <li>- The Local Plan Timetable should set out when Gateway 3 will commence. Relevant parties should be notified a minimum of four weeks prior to commencement. The gateway assessment should last no more than four weeks (up to six weeks in exceptional circumstances). Plan preparation should continue in parallel with the assessment.</li> <li>- Assessment will be undertaken by PINS and will be subject to a fee</li> <li>- Prior to the Gateway, a short report detailing progressing against key topics will need to be prepared. Government intends to provide a digital template to be used by the Local Planning Authority for the assessment. A statement of compliance with legislation and national policy template will need to be completed.</li> <li>- When the report is submitted to the Inspector, this marks the formal commencement of the gateway.</li> <li>- The assessment will be focussed on checking the plan is ready to proceed to examination.</li> <li>- Provisional topics for the assessment (TBC): <ul style="list-style-type: none"> <li>- Procedural and legal requirements met</li> <li>- Regard had to observations and advice at Gateway 2</li> <li>- Evidence prepared as proposed and any previously identified gaps addressed</li> <li>- Relevant SEA (and subsequently EOR) published, including explanation of compliance with national requirements</li> <li>- Summary of representations available</li> <li>- Digital and data requirements met (including policies map)</li> <li>- Nationally defined templates used, where appropriate</li> </ul> </li> </ul>

Key deliverables/ milestones	Likely content / production process
	<ul style="list-style-type: none"> <li>- Engagement activities undertaken in line with PID with regard to national guidance</li> <li>- SDS general conformity statement prepared (where relevant)</li> <li>- Practical readiness for examination (e.g. venue identified for hearings etc.)</li> <li>- Gateway 3 will have a binding role. A local planning authority will be required to submit the draft plan where the appointed person has advised the prescribed legal and procedural requirements are met. Soundness issues may be flagged by the assessor but will be considered further and resolved as part of the examination. If legal and procedural requirements are not met, the third gateway assessment will be repeated following further work by the local planning authority.</li> <li>- The issue of the Inspector's Gateway 3 Report marks the formal end of the Gateway. The report must be published publicly as soon as it is reasonably practicable.</li> <li>- Where a particular body or organisation is identified in the Inspectors Report, the Local Planning Authority must notify that body at the same time as publishing the report to enable quick resolution of any identified issues.</li> </ul>
Submission version of plan	<ul style="list-style-type: none"> <li>- Likely to be largely the same as the second consultation draft plan</li> <li>- LURA sets out that the plan must: <ul style="list-style-type: none"> <li>- Include policies for the amount, type, location and timetable for development in the area</li> <li>- Include policies for the use of or development of land that relate to the particular characteristics or circumstances of the area</li> <li>- Include details of infrastructure and affordable housing requirements</li> <li>- Include design requirements that should be met for planning permission to be granted</li> <li>- Consider mitigation of and adaptation to climate change</li> <li>- Take account of any Local Nature Recovery Strategy</li> <li>- Take account of an assessment of the amount and type of housing needed, including the amount of affordable housing.</li> </ul> </li> <li>- Government intends to provide guidance on the preparation and presentation of key components of the plan, such as the key diagram, spatial strategy and site allocations</li> </ul>
Policies map	<ul style="list-style-type: none"> <li>- Government intends to provide templates and standards to guide the production of the policies map</li> </ul>
Statement of compliance	<ul style="list-style-type: none"> <li>- The statement of compliance with legislation and national policy is intended to be a signposting document that will set out where in the suite of evidence each national policy has been considered. It is intended to reduce some of the need for topic papers. It will need to be submitted as part of the Examination documents.</li> <li>- Government intends to provide a template.</li> </ul>
Accompanying documents for submission	<ul style="list-style-type: none"> <li>- This might include documents similar to the current Duty to Cooperate Statement of Compliance, and Statements of Common Ground, as required for the new flexible alignment test, and Topic Papers (as well as evidence base studies) )</li> </ul>
Examination	<ul style="list-style-type: none"> <li>- To take no longer than six months; if consultation on proposed modifications is needed, it could be extended by up to three months.</li> <li>- New procedural guidance on local plan examinations to be issued in due course, to speed up the timeframe for examinations. Changes likely to cover appointment of Inspectors, Matters, Issues and Questions (MIQ) process, third party engagement, notification period and main modification consultation.</li> <li>- A local plan examination may only be paused once for a maximum of six months. If the issue is resolved in this time period, the examination will resume otherwise, the Inspector will recommend the authority withdraw the plan.</li> </ul>

Key deliverables/ milestones	Likely content / production process
Annual Monitoring Report	<ul style="list-style-type: none"> <li>- A local planning authority will be required to undertake annual monitoring against a nationally prescribed set of metrics.</li> <li>- The report will also have to include a short narrative on the implementation of the policies in its plan, including progress against the plan vision</li> <li>- It will need to be published by a fixed date annually</li> <li>- Government intends to provide a template and data standards will be prepared alongside this.</li> </ul>

#### 5.4.2 Engagement and consultation

A communication and engagement strategy will be required for the Local Plan. This will be informed by the Council's wider engagement strategy, which is the process of being updated. This will provide the parameters for activities, such as general publicity, Local Plan webpages and social media campaigns.

Aligned with legal requirements and the Government's consultation responses<sup>32</sup>, the formal processes for and approaches to consultation and engagement for the Local Plan will be set out in the Project Initiation Document. The Government has set out a clear preference that a more standardised approach to consultation is undertaken. Forthcoming guidance is likely to have a strong preference that consultation comments are submitted in a digital / online format by default. Government is exploring how data standards and consistent templates can play a key role in analysing consultation responses. Guidance will also be issued on how to achieve a balance between different types of engagement methods.

The Council is in the process of procuring consultation software. This will be used to conduct the formal consultation events required for the Local Plan and is likely to have the capacity to sort, analyse and respond to consultation comments which were made online.

#### *Council's engagement strategy*

The Council has a corporate Communications and Engagement Strategy 2022-2026 (CES), which covers engagement with the public from all corporate services, including planning. The communication and engagement strategy which will be developed for the Local Plan will need to base itself on the main principles set out in the CES. The 2040 vision of the current CES is to:

- Increasingly use digital solutions to provide the services that our residents both need and expect, helping them to get the services 24/7 and enabling the council to focus resources on the digitally excluded and most vulnerable or complex cases;
- Continue to build a great sense of community, reducing social isolation, celebrating our diversity, and strengths and through this increasing community connectedness and resilience

The Communications and Engagement Strategy 2022-2026 is expected to be updated shortly to reflect more up-to-date challenges and routes to engagement, however it is likely

<sup>32</sup> MHCLG / DLUHC (2023) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/levelling-up-and-regeneration-bill-consultation-on-implementation-of-plan-making-reforms#detailed-summary>; MHCLG (2025) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/outcome/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation#introduction>

that the overarching vision will remain consistent with the 2022-2026 vision. The strategy emphasises that the Council hopes to improve engagement by:

- Setting a clear distinction between engagement and consultation;
- using the Local Government Association New Conversations 2.0 guide as best practice to develop engagement techniques within the council;
- taking steps to engage with hard-to-reach communities.

In drafting the Local Plan communication and engagement strategy, the Council will seek to follow corporate guidance by:

- using a variety of methods to ensure it reaches a broad audience
- encouraging communities and stakeholders to participate in the plan making at different stages of the process
- increasing awareness of the Local Plan preparation and of the aim and remit of the Local Plan.

The key audiences for the new strategy and the new Local Plan will include residents, developers, businesses, Councillors, Parish Councils, statutory and non-statutory stakeholders, as well as strategic and neighbouring local authorities.

#### 5.4.3 Duty to Cooperate/ Flexible Alignment Test

The Duty to Cooperate requires Local Planning Authorities, County Councils and prescribed body to constructively and actively engage on a continuous basis to ensure that Local Plans have effectively addressed strategic matters across boundaries.

Government proposes to replace the Duty to Cooperate by a Flexible Alignment Policy. Details on the workings and requirements associated with this proposal are yet to be published by government. However, and until the date government revokes the Duty to Cooperate, it remains a legal requirement for any plan-making authority.

#### *Content of Duty to Cooperate*

The Duty to Cooperate only concerns strategic matters which are defined in the NPPF (paragraph 20-23) and include the overall spatial strategy for the provision of housing, employment, retail, leisure and commercial developments; infrastructure such as transport, water, waste and energy; community facilities; and conservation and enhancement of the natural, built and historic environment.

Based on previous experience, the following topic areas will require a comprehensive approach at the sub-regional scale and the Duty to Cooperate on these topics is likely to come under close scrutiny at Examination:

- Suitable Alternative Natural Greenspaces (SANGs) provision
- Meeting the needs of Gypsy and Traveller and Travelling Showpeople
- Infrastructure delivery

These topics are also likely to require Statement of Common Grounds. This list will need to remain under review as the plan progresses, and further matters may be identified through Local Plan work. It is also likely that Hart is solicited by Duty to Cooperate partners to help them address some of their strategic matters.

### Approach to DtC in Hart

DtC bodies should be contacted during the early engagement period of the local plan preparation, to inform them of the start of a new Local Plan project. On-going discussions with some of the bodies and early discussions with other bodies have already taken place, demonstrating active engagement from Hart District Council with its partners.

Opportunities for joint working and joint production of evidence base with neighbouring authorities should be examined as part of Duty to Cooperate meetings (see section 3.4 for further discussion).

On-going engagement through the Local Plan should be recorded and a tracker of meetings and engagement in writing should be kept. This should form the basis for the Duty to Cooperate Statement of Compliance which will need to be submitted with the plan for examination. The Compliance Statement should illustrate how the Council has undertaken its Duty to Cooperate and aims to demonstrate compliance with the requirement the NPPF.

As part of the Statement of Compliance, the Council will need to demonstrate that the strategic matter and solutions proposed to the matter have been agreed between parties. This should be done through one or several Statement of Common Grounds (SoCG). A SoCG is 'a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters.'<sup>33</sup> These will be submitted for examination alongside the plan.

#### 5.4.4 Evidence base and supporting studies

The new Local Plan will need to be Examined jointly with all the material which was produced to support the creation of the policies in the plan. Some of these documents are legal requirements and others are a useful way of demonstrating that the Local Plan is justified. A significant part of these documents will need to be produced before work on the policies can start, to help the Council understand the current situation in the district. These evidence base documents will then inform the policies in the plan, as required by national policy:

*'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'* (NPPF 2024, paragraph 32)

A review of the existing evidence base (see section 4.3) and of national policy and guidance was undertaken to develop the list of the documents which will likely need to be produced to support the Local Plan (Table 11). It should be noted that Government<sup>34</sup> has emphasised that under the new plan making system, it is important the evidence is proportionate. This is considered key to meet the 30-month timeframe. However, to date, it is unclear what this means in practice in terms of the evidence base studies that will need to be prepared for the new Local Plan. Government<sup>35</sup> has set out a series of proposed changes, that include:

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<sup>33</sup> Planning Practice Guidance, Plan Making, paragraph 010

<sup>34</sup> MHCLG (2023) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/levelling-up-and-regeneration-bill-consultation-on-implementation-of-plan-making-reforms#chapter5>

<sup>35</sup> MHCLG (2025) <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation/outcome/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation#chapter-5-evidence-and-the-tests-of-soundness>

- Clearer expectations for evidence base preparation, which will be set out in policy and guidance. This will include the end-to-end process for site identification, assessment and selection, and the extent of evidence expected to demonstrate a plan is sound.
- Increased standardisation of key evidence and data.
- Freezing data or evidence at particular points of plan making, which will be set out in policy and guidance.

In the absence of any further detail regarding the new plan making system requirements, the list of evidence base studies identified below is considered to represent a proportionate covering of the main topics required for a sound Local Plan. A pragmatic and efficiency driven approach to defining the likely evidence base has been taken, reflecting not only the many unknowns of the new plan making system but also the desire to submit a draft Local Plan prior to April 2028. For example:

- A Housing and Employment Needs Development Assessment (HEDNA) has been proposed. This will combine multiple previous studies reducing the need for duplication of data analysis and ensuring better consistency across the evidence base.
- No standalone climate change studies have been identified but rather it is suggested that climate change adaptation and mitigation is considered as a golden thread across relevant evidence base studies. For example, climate change mitigation measures such as SuDs and urban greening could be addressed in the design code and green infrastructure strategy; while the need for renewable energy could be considered through site selection and the inclusion of locally specific development management policies (if not covered sufficiently by the NDMP). This is considered proportionate given the budget available and the significant time pressures that the Local Plan production process will face. It is suggested the following climate change topics are picked up in the relevant evidence base studies.

It is expected that climate change policies and regulations will be present at the national level through the NDMP, the anticipated updates to building regulations and the future homes standards. However, in the light of the uncertainty over these national policies and standards, the need to conduct additional work to include policies on climate change in the plan will need to be kept under review.

For each of the studies, a recommended resourcing option has been identified. This recommendation seeks to achieve a balance between:

- Ensuring the Policy and Economy Team members have a varied balance of Local Plan and business as usual work. This is considered important to encourage recruitment and retention of team members, since Local Plan production is usually considered to be the most interesting type of policy work. Where possible, team aspirations identified through workshop discussions have been reflected in the allocation of tasks.
- Capitalising on the Team's local knowledge in terms of geography, characteristics, data, issues and politics, as well as stakeholder relationships, much of which is generated through business-as-usual activities. Then, identifying those studies where local knowledge is likely to add greatest value or offer greatest efficiencies in production.
- Identifying when technical skills or access to specialist datasets will mean that external consultants are likely to be required to carry out work.



- Recognising the capacity limits of a relatively small team to carry out a significant volume of work in time limited period.

Where relevant, key factors for the recommendation are identified.

**Table 11 Indicative evidence base and supporting studies**

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
<b>Housing and employment</b>				
Housing and Employment Land Availability Assessment and (HELAA)	The Housing and Employment Land Availability Assessment (HELAA) will assess the pool sites to be considered for the Local Plan spatial strategy, including those submitted through the Call for Sites. The assessment will determine their suitability, availability and deliverability.	NPPF 2024, paragraphs 20 and 72 PPG Housing and economic land availability assessment	This study will replace the previous Strategic Housing Land Availability Assessment (SHLAA) (unpublished).	To be produced in-house Much of the data required held in house or can be provided through Call for Sites exercise. Will be able to draw on local knowledge of policy and development management planners. Will also be able to draw on new national digital resources, e.g. DfT connectivity tool. Planned purchase of the consultation software should allow digitisation of many elements of this exercise offering efficiency savings.
Housing and Economic Needs Assessment (HEDNA) including Employment Land Supply	The Housing and Economic Needs Assessment (HEDNA) will comprehensively assess housing and employment needs in the district over the next 20 years.  Local Housing Need (LHN) is now identified at the national level. The role of the HEDNA will thus be to define the Housing Market Area and consider the types of housing required, including affordable housing, self-build and specialist housing for older	NPPF 2024, paragraph 20(a)	The HEDNA will cover multiple topics which require analysis of the same type of data, to ensure efficiency and value for money. The HEDNA will replace the following studies: <ul style="list-style-type: none"><li>- Strategic Housing Market Assessment (SHMA)</li><li>- Specialist Housing for Older People</li><li>- Employment Land Review</li></ul>	To be produced externally by consultants Requires access to specialist data sets and knowledge of specialist technical skills, such as economic modelling.

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	<p>people and children and adults with significant needs.</p> <p>The HEDNA will define the Functional Economic Market Area, consider market signals and will inform the plan on the quantum and type of employment required for the area. The HEDNA for Hart will include a chapter on Employment Land Supply, which will assess the availability of land for different employment uses and will suggest potential land for allocation by assessing suitable sites for employment use.</p>			
Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments (GTAA)	<p>The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment is an assessment of the future accommodation needs of Gypsies, Travellers and Travelling Showpeople (including Boat people) required by the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS). Local planning authorities (LPAs) are required to undertake these assessments to understand the level of unmet need for mobile home pitches. The assessment will be used to determine whether there is a requirement for</p>	<p>NPPF 2024, paragraph 20</p> <p>PPG Housing and economic land availability assessment</p>	<p>This study will replace the Gypsy and Traveller Accommodation Assessment 2020.</p>	<p>To be produced externally consultants</p> <p>Requires specialist technical knowledge. Specialists typically have access to fieldwork teams with strong relationships with Gypsy, Traveller and Travelling Showpeople communities enabling better data collection.</p>

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	additional site provision within a given area.			
GTTS Pitch and Plot Delivery Assessment (GTTS PDA)	The Pitch and Plot Delivery Assessment will help assess how much of the unmet need for pitches and plots could be provided within or adjacent to existing sites and yards.	NPPF 2024, paragraph 20	A new study to help inform policies on Gypsy and Travellers	To be produced externally by consultants Requires specialist technical knowledge. Specialists typically have access to fieldwork teams with strong relationships with Gypsy, Traveller and Travelling Showpeople communities enabling better data collection.
Retail and Leisure Needs Study	The Retail and Leisure Needs Study will assess the current provision in Hart and future trends which are likely to impact the quantum and type of retail and leisure which are likely to be needed in Hart. This will inform the policies in the plan, to ensure that they deliver the right type of retail and leisure for Hart residents. (NB Sometimes carried out as a standalone exercise and sometimes combined with a Town Centre Health Check)	NPPF 2024, paragraph 20(a)	This study will replace the Retail, Leisure and Town Centres study.	To be produced externally by consultants Requires access to specialist data sets and knowledge of specialist technical skills
Town Centre Health Check	The purpose of the Town Centre Health Check is to understand the type of land uses present on the main high streets in Hart. It will classify the land uses and assess the level of vacancy of the retail units to evaluate the	NPPF 2024, chapter 7	A new study to help inform policies on town centres and retail.	To be produced in-house Local knowledge plus ability to carry out site visits makes this ideally suited for inhouse team.

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	performance of the existing town centres. (NB Sometimes carried out as a standalone exercise and sometimes combined with a Retail and Leisure Needs Study)			
<b>Infrastructure</b>				
Infrastructure Delivery Plan	The Infrastructure Delivery Plan (IDP) will assess the baseline infrastructure provision in the district across education, health, water, energy, transport. The second part of the IDP will assess spatial options to determine what infrastructure investment may be required to support the level and distribution of growth of the options.	NPPF 2024, paragraphs 8a and 20	This is a new evidence base which will be key in determining the level and type of infrastructure required to support new development in the District.	To be produced externally by consultants Resource intensive exercise. Access to specialist technical skills considered helpful.
Transport Baseline	The Transport Baseline Assessment will establish the transport characteristics of the plan area focussing on public transport and active travel accessibility and congestion. This information informs sustainable approaches to transport at a plan-making level.	NPPF 2024, chapter 9 and paragraph 109	This study will replace the previous transport baseline (unpublished).	To be produced externally by Hampshire County Council (or its successor body) Requires access to information and transport model held by HCC.
Transport Modelling	Transport Modelling is a functional and required tool in assessing and mitigating the negative transport impacts of development in order to promote sustainable	NPPF 2024, chapter 9 and paragraph 109	This study will replace the previous transport modelling output (unpublished).	To be produced externally by Hampshire County Council (or its successor body)

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	development. It is a comprehensive and systematic process that sets out transport issues relating to a proposed development and identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport. The findings will be integrated in the site allocation policies.			Requires access to information and transport model held by HCC.
Transport Study	The Transport Study will consider the implications of the transport baseline and modelling for the development of the spatial strategy. It will consider the potential impacts of the proposed site allocations and the mitigations necessary to make the impact acceptable. The study will consider how the Local Plan can contribute to a shift to more sustainable transport usage and to a vision-led transport system in Hart.	NPPF 2024, chapter 9 and paragraph 109	This study will replace the previous transport study (unpublished).	To be produced externally by consultants Requires specialist technical knowledge.
Green and Blue Infrastructure Study	The Green and Blue Infrastructure Study will map and assess the connectivity, quality and function of the Green and Blue Infrastructure network. This will include developing strategic priorities to enhance biodiversity,	NPPF 2024, paragraphs 8a and 20	This study will replace the Green Infrastructure Strategy.	To be produced externally by consultants Requires specialist technical knowledge.



Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	access, climate resilience and multifunctional use.			
Open Space, Playing Pitch and Built Facilities Assessment	Open Space, Playing Pitch and Built Facilities Assessment will be a tool to identify shortfalls and potential surpluses of open space and port and leisure facilities in the district and to identify existing open space which need to be protected from development. The study will look at supply, including the quality and accessibility, of these spaces and provision. It will also include an assessment of future demand trends and potential changes and improvements required to respond to those.	NPPF 2024, paragraph 102	This study will update: <ul style="list-style-type: none"> <li>- Open Space Study</li> <li>- Playing Pitch Strategy</li> <li>Built Facilities Strategy</li> </ul>	To be produced externally by consultants  Resource intensive exercise. Requires specialist technical knowledge.
<b>Built environment</b>				
Settlement Hierarchy Study	The Settlement Hierarchy Study arranges settlements in a structured order based on services and facilities offered and assist on delivering development in the most appropriate and sustainable locations.	NPPF 2024, paragraph 8	This will study will provide the evidence to update the Hart Settlement Hierarchy contained in the Local Plan.	To be produced in-house Relatively straightforward exercise, that draws on local knowledge, fieldwork and the new DfT Connectivity Tool.
Settlement Boundary Paper	The Settlement Boundary Paper will look at the evidence and proposals presented as	NPPF, paragraph 23	This paper will provide the evidence to update the	To be produced in-house Relatively straightforward exercise, that draws on

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	part of the Local Plan and will build a case to demonstrate a potential need to amend settlement boundaries to reflect the proposed allocations and new infrastructure.		settlement boundaries on the Policies Map.	local knowledge and fieldwork
Design code	The design code will be a set of design requirements for the physical development of the area. It is made up of rules for specific development types and areas, which should be unambiguous and normally include graphical illustrations. Recent planning policy consultation by MHCLG suggests that design codes may only be required for focused areas rather than the whole district. The design code will include analysis of the built form, layout, and density of Hart's main settlements.	NPPF 2024, paragraph 134	This is a new study required under the new plan making framework. This study will replace the Urban Characterisation and Density Study.	To be produced externally by consultants Resource intensive exercise. Requires specialist technical knowledge.
Heritage assessment (site level)	The Heritage Assessment(s) will assess potential allocations to identify their heritage features and the impact of potential development. It may include details on how to mitigate these impacts.	NPPF 2024, chapter 16	This study will replace any previous (unpublished) evidence on site-specific heritage assessments.	To be produced externally by consultants Requires specialist technical knowledge.
<b>Natural environment</b>				

<b>Name</b>	<b>Purpose</b>	<b>Legislative and policy requirements</b>	<b>Relationship to previous Local Plan evidence</b>	<b>Recommended resourcing</b>
Ecological assessment (site level)	The Ecological Assessment(s) will assess potential allocations to identify their ecological features and potential development impacts. It can include details of any habitats, protected species, or key ecological constraints that could affect a proposed project and assist in planning accordingly.	NPPF 2024, paragraph 187 (a) and (d) and paragraph 192	This study will replace any previous (unpublished) evidence on site-specific ecological assessments.	To be produced externally by consultants Requires specialist technical knowledge.
Landscape Character Assessment	The Landscape Character Assessment will identify and describe the variation in landscape across Hart, explaining the unique combination of elements and features that make landscapes distinctive. This will be used as a baseline for the landscape sensitivity and capacity assessment.	NPPF 2024, paragraph 20(d)	This study will replace the 1997 Landscape Character Assessment.	To be produced externally by consultants Requires specialist technical knowledge.
Landscape Sensitivity and Capacity Assessment (area/site level)	The Landscape Assessment(s) will assess potential allocations to identify their landscape character, the features which contribute to this character and the sensitivity and capacity of these areas. The assessment will consider the impact of potential development and may include details on how to mitigate these impacts.	NPPF 2024, paragraph 187 (a) to (d)	This study will replace the previous 2016 (unpublished) evidence on site-specific landscape assessments.	To be produced externally by consultants Requires specialist technical knowledge.
Strategic Flood Risk Assessment (SFRA)	The Strategic Flood Risk Assessment (SFRA) assesses and maps the risk of flooding	NPPF 2024, paragraph 166	This study will replace the Strategic Flood Risk Assessment and addendum	To be produced externally by consultants

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	from all sources, including fluvial, tidal and surface water flooding from sources such as rivers, sewers, groundwater, canals and the impact of climate change. It is used by planning authorities to take flood risk into account when making land use allocations and in general plan-making. It helps to prepare flood risk management policies and identify suitable locations for developments.		regarding Surface Water Indicative Flood Problem Areas.	Requires specialist technical knowledge.
Strategic Flood Risk Assessment Level 2 (SFRA2)	The Level 2 SFRA builds on the findings of the level 1 SFRA and considers more detailed flood characteristics, including at a site level, to inform site allocations, climate change mitigation and adaptation measures and site-specific policies. The assessment will look at flood probability, depth, velocity, rate of onset, and duration within flood zones.	NPPF 2024, paragraph 166	This study will replace the Level 2 SFRA - Exception test.	To be produced externally by consultants Requires specialist technical knowledge.
<b>Whole Plan Assessment</b>				
Whole Plan Viability Assessment	The Viability Assessment will assess the plan's viability. To do this, it will create a baseline for the district based on macro economic factors and local circumstances. It will then assess the economic viability of the policies proposed by the plan, to	PPG Viability, section on Viability and plan making	This study will replace the viability assessment of the previous plan (unpublished)	To be produced externally by consultants Requires specialist technical knowledge.

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	ensure that they are realistic and that their total cost will not undermine the overall deliverability of the plan.			
IIA (SA, EqIA, HIA)	The Integrated Impact Assessment will combine the Sustainable Appraisal, the Equalities Impact Assessment and the Health Impact Assessment.			To be produced externally by consultants Requires specialist technical knowledge.
	The Sustainable Appraisal will appraise the social, environmental, and economic effects of a plan from the outset and ensure that decisions are made that contribute to achieving sustainable development. It will assess options and alternatives and facilitate decision-making processes. As such, it is a key evidence base document to justify the plan.	Planning and Compulsory Purchase Act 2004, section 19 paragraphs 5 (a) and (b)	This study will replace the previous Sustainability Appraisal (unpublished).	
	The Health Impact Assessment will evaluate the potential health effects of the propose plan policies and allocations. By identifying both positive and negative impacts on health, HIA helps decision-makers make informed choices that prioritize well-being. It's use in spatial planning can guide recommendations to maximize positive impacts	NPPF 2024, paragraph 8b		

Name	Purpose	Legislative and policy requirements	Relationship to previous Local Plan evidence	Recommended resourcing
	while minimizing adverse effects, while addressing health inequalities.			
	The Equalities Impact Assessment will ensure that the policies and proposals in the plan are fair and do not unlawfully discriminate against any protected characteristic. It covers both strategic and operational activities. The EIA will help the Council understand the potential effects of its proposal, including any adverse impacts, and integrate them into its evidence base and clear reasoning.	Equality Act 2010, sections 149 to 157		
Habitats Regulation Assessment (HRA)	The Habitats Regulations Assessment (HRA) is a crucial process that determines whether development plans or project proposals could negatively impact designated protected European sites beyond reasonable scientific doubt. Process is iterative and revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan or project until no significant adverse effects remain. This will include the identification of SANG requirements.	Conservation of Habitats and Species Regulations 2017 (as amended)	This study will replace the previous HRA (unpublished).	To be produced externally by consultants Requires specialist technical knowledge.

## 6. Local Plan project management

### 6.1 Approach to project management

This section sets out the suggested approach to project management for the new Local Plan. It considers the potential options for resourcing the project and on the basis of the recommended resourcing option, provides a programme and indicative costs for the work. It should be noted that programme and budget are necessarily based on various assumptions, which are detailed within the sub-sections. Consideration is also given to the appropriate governance arrangements and likely risks and associated mitigation to ensure that the Local Plan delivery is as smooth as possible.

### 6.2 Resourcing options

#### 6.2.1 Existing Resources

##### *Existing team capacity*

The Hart Planning Policy and Economic Development Team comprises five permanent team members, who work both full and part time for the Team, providing an equivalent resource of 3.95 FTE officers (or 19.75 days per week (dpw)) Table 11). The Team is responsible for delivering 'business as usual' activities, which accounts for between 11% and 50 % of team members' time. These activities include:

- Fulfilling regulatory duties, such as Neighbourhood Plans, Brownfield Land Register, Self and Custom Build Register, Authority Monitoring Report, completion of monitoring requirements (e.g. Delta returns).
- Engaging with neighbouring authorities to meet Duty to Cooperate requirements.
- Attendance at regular internal meetings (e.g. management, Member briefings) and external meetings (e.g. Hampshire Heads of Planning or Local Nature Recovery Strategy).
- Support for the Development Management team, i.e. general queries, pre-application advice, planning applications and appeals.
- Corporate activities, e.g. digital or work practice initiatives.
- Responding to Central Government initiatives and consultations (e.g. LGR or planning reform consultations).

The remainder of the Team's time is taken up by one-off projects, such as the production of specialist technical advice notes.

Once business-as-usual activities have been taken into account, the existing team has a total capacity (14.15 dpw) equivalent to 2.83 FTE officers to dedicate to producing a new Local Plan.

**The current resources within the planning team are considered insufficient to produce a new Local Plan. Therefore, alternative options to bolster resourcing need to be considered.**



**Table 12 Planning Policy resources and capacity**

Team member	Role	Availability (DPW)	Time spent on BAU activities (DPW) / (% of availability)	Time available for Local Plan work (DPW) / (% of availability)
[REDACTED]	Team Manager	5	2.5 (50%)	2.5 (50%)
[REDACTED]	Principal Planner	5	0.75 (15%)	4.25 (85%)
[REDACTED]	Principal Planner	2.25	0.25 (11%)	2 (89%)
[REDACTED]	Senior Planner	5	1.3 (26%)	3.7 (74%)
[REDACTED]	Admin & tech support	2.5	0.8 (32%)	1.7 (68%)
<b>Total</b>		<b>19.75</b>	<b>5.6</b>	<b>14.15</b>

### *Existing team skills*

The team collectively offer a range of experience and skills that will be valuable in terms of producing a new Local plan, including:

- Involvement in the production of the adopted Local Plan, which will offer continuity in terms of knowledge and lessons learned.
- Experience of development management, which is helpful in the drafting of planning policies.
- Previous involvement in the production of various technical studies, which will be helpful experience when updating the Local Plan evidence base.
- Data analysis and interpretation that will be important as the building blocks for many of the evidence base studies.
- Project management skills that will be useful for development of and monitoring of the Local Plan programme.

**Team strengths have been reflected in the proposed allocation of tasks and responsibilities in the accompanying resource plan. Equally identified skill gaps have been reflected in the identification for further resource.**

### *Wider resources*

In addition to the Planning Policy and Economic Development Team members, additional support to produce the new Local Plan will be provided by:

- Hart District Council Communications Team who will create dedicated web pages for the Local Plan and oversee the associated social media campaign. Given the limited size of the Communications Team, they will not be able to offer wider resources to further support Local Plan engagement and consultations.
- Wider Hart District Council teams and officers, including the Housing Strategy team, the Flood Risk Officer, the Biodiversity Officer, and the Environmental Promotions manager. Their input into the Local Plan will be limited to specialist inputs on technical matters, such as biodiversity, green infrastructure and for specific evidence base studies, such as the HEDNA and SFRA.

- East Hampshire District Council, with whom Hart District Council have a service level agreement to provide GIS, will be able to provide spatial data for evidence base studies and Local Plan production, and develop the policy map.
- Economic Development Officer, seconded into the Planning Policy and Economic Development Team from Rushmoor Borough Council for 0.1 FTE, who may be able to provide additional resource / insight for economic studies and policy development.
- Hampshire County Council, who may be able to provide technical support, for example, in relation to heritage, ecology and transport modelling, in the short term. As discussed in section 3.2, Hampshire County Council will cease to exist in 2028. It is not yet clear how its existing services will be delivered. Ongoing engagement will be necessary, and if required external consultancy support may be required to fill any gaps.

**A limited pool of additional resource is available to support Local Plan production. This has been reflected in the resource plan and budget.**

### 6.2.2 Resourcing option 1: re-deployment of internal resources

As a matter of principle, Development Management team members are often a good fit for Local Plan work in terms of skills and experience. As complementary workstreams, time spent within both services offer a number of benefits, including strengthening policy formulation and application, and smoothing fluctuations in workload across the services.

The possibility of redeployment of Development Management officers was explored as part of the officer workshops held for this commission. It was evident from the discussions that the Development Management team is currently operating at maximum capacity, with no scope to divert resource to support Local Plan work.

**Discounted as a valid option.**

### 6.2.3 Resourcing option 2: working with a neighbouring authority

Two models were considered under this option:

- Outsourcing Local Plan production to a neighbouring authority.
- Joint working with a neighbouring authority.

The production of the adopted Local Plan was outsourced to East Hampshire given that Hart Planning and Economic Team was similarly under-resourced at that time. Selected team members were seconded to the East Hampshire planning policy team; however, the Local Plan management was overseen by East Hampshire officers. Although the production of the plan technically went well, the feedback at that time was that the process was too removed from local politics and senior leadership and councillors did not have sufficient engagement or oversight of the production process. This led to the plan being brought back in-house for Regulation 19 and the Examination. On the basis of this previous experience, this has been discounted as an option for the new Local Plan.

In line with best practice, consideration was given to the possibility of joint working with a neighbouring authority(ies). As explored in section 3.4, Rushmoor is best aligned with Hart in terms of geographical proximity and Local Plan timetable. There is also the possibility that Rushmoor and Hart will be part of the same unitary authority in due course following LGR (see section 3.2). This option was discussed at the officer workshops, however, duty to cooperate conversations had not revealed any appetite for this option to date. Therefore, on this basis, it was discounted as option.

## Discounted as an appropriate option.

### 6.2.4 Resourcing option 3: permanent or temporary recruitment

The possibility of permanent or temporary recruitment to fill resource gaps was explored as part of the officer workshops held for this commission. Officer feedback was that recruitment had historically been challenging and took a significant amount of time to yield results.

Given the need to meet a new faster timetable for Local Plan production and the Corporate desire to submit a plan prior to the creation of the new unitary authority, additional resources need to be secured quickly. The market for permanent experienced policy planners continues to be tight, as reported across the sector. It is therefore considered unlikely that the full requirements could be speedily met through permanent recruitment. There are also questions regarding the cost effectiveness of undertaking extensive permanent recruitment to fill the whole resourcing gap two years before the Council is replaced by the unitary authority. Nevertheless, there is merit in undertaking targeted permanent recruitment to fill key identified resource gaps within the team. This targeted recruitment would be complemented by securing additional support for Local Plan preparation via the appointment of a Local Plan management consultancy team (see section 6.2.5).

If permanent staff cannot be secured, then temporary staff were considered an appropriate back up option to fill key identified roles.

## Recommended option to fill key identified roles.

### *Key roles for recruitment.*

It is recommended that there are two key roles for recruitment:

- A principal planner
- A policy planner

The recruitment of a principal planner will help the team manage the production of the different evidence base studies by consultants and will increase the capacity of the team in project leadership, review and delivery for the workstreams which will be delivered in-house. This will ensure that the planning policy manager can take a stepped back role, focused on the strategic and overall operations required for the production of the plan. A new principal planner is also likely to bring complementary skills to the team, ensuring that most areas of policy expertise are covered within the team.

The recruitment of a policy planner will bring a more junior resource within the team. The policy planner will take on most of the monitoring duties of the team, as well as support the senior planners and principal planners. This will free up the time of the senior planner and principal planners to focus on more strategic work, or on work where further experience and skill is required.

### 6.2.5 Resourcing option 4: consultancy support

The possibility of appointing a Local Plan consultancy team was explored as part of the officer workshops. This was identified as the preferred option by the Policy and Economics Team as well as senior leadership and the Portfolio Holder.

Under this option, one consultancy would be appointed to oversee Local Plan production and management, including the delivery of the evidence base studies identified for external production. The consultancy could either prepare all evidence base studies

required for the commission or oversee a consortium of consultants to produce the full suite of required studies.

Although the appointment of a consultancy team is likely to be more expensive than recruiting further additional staff to the Policy and Economic Team, this option is likely to offer various benefits, including:

- Single appointment process for all the technical evidence base studies that would likely have to be outsourced irrespective of the size of the inhouse team due the need for specialist skills or access to specialist data source. A single appointment process is considered to be efficient given the effort expended for each individual procurement.
- Access to wide pool of resources that can likely be flexed to accommodate any expected changes in workload.
- Likely to be faster way of securing sufficiently experienced resources compared to recruitment, particularly given there is no guarantee that such resources are available in the market.
- Securing experienced resources who will offer a range of experience delivering evidence base studies, Local Plans and project management; and will likely be able to offer experience and best practice from elsewhere, which can be applied within the Hart context.
- Cross-learning between officers and consultants due to close working practices, which will equip the team to support the plan through Examination.

It is recommended that in selecting this approach, that the Council and Local Plan consultants adopt a 'one team' approach. This approach has been used in multiple councils elsewhere and offers various advantages compared to fully outsourcing Local Plan work, including:

- Local knowledge can be more easily be embedded in the project.
- Ability to build on existing relationships within the Council and with external stakeholders.
- More agility to respond to local politics.
- Involvement of in-house team will mean that it is easier for senior leadership team and councillors to stay up to date on progress and issues.

### **Recommended option to provide additional capacity required.**

## **6.3 Proposed resource plan**

The resource plan is based on a combination of options 3 and 4 presented above, and on the following assumptions:

- Retention of the current Planning and Economic Team members and appointment of a one new principal planner and one new policy/career grade planner, who will collectively deliver Local Plan workstreams and a defined set of business-as-usual activities. This will create a team equivalent to 5.95 FTE, which is considered the minimum size possible to deliver the anticipated workload. The team would thus be structured as follows:

- Manager
- 2.5 FTE Principal Planners
- 1 FTE Senior Planner
- 1 FTE Policy Planner
- 0.5 FTE Technical assistant.

Any changes/ deficits to the above would require replacement team members or alternative resources to be identified with immediacy to ensure the Local Plan programme stays on track.

- Appointment of Local Plan consultants to support the production of the Local Plan,. As well as a wide range of subject matter experts to deliver technical evidence base studies, the resource plan has assumed that the consultant team would include two highly experienced consultants offering both local plan and project management skills, who would be responsible for overseeing the day-to-day plan production and management. They would each provide two days per week dedicated to the local plan.
- These resources would work together collectively as ‘one team’ to deliver the Local Plan.

Table 13 sets out the assumed split of work between the consultants and Hart officers. The table summarises the key responsibilities and further detail can be found in the accompanying full resource plan. The allocation of tasks within the resource plan has been based on the following principles:

- Delivering work at a sufficient pace to submit a plan prior to April 2028.
- Allocation of work to current team based on their strengths and experience both in relation to business-as-usual activities and Local Plan production.
- Division of evidence base study production between consultants and Hart officers, as detailed in section 5.4.4.
- Joint working by consultants and Hart officers for Local Plan deliverables up to submission.
- Involvement of consultants in Local Plan production only up to submission. Thereafter, any further involvement of the consultants to support the Examination would be determined by the new unitary authority.
- Hart officers solely responsible for Local Plan consultations, activities related to gateway checks and flexible alignment test, and business-as-usual activities.
- A target maximum capacity of 90% for the Hart Planning and Economic Team within the resource plan, as identified as a mitigation measure for the project, based on the project risks identified in section 6.6.

### **Planning Policy and Economic Development Team**

The proposed shape and size for Planning Policy and Economic Development team has been based on the assumption that officers will be responsible for business-as-usual activities and specifically assigned Local Plan workstreams.

The Planning Policy and Economic Development Manager would be responsible for the appointment and management of the Local Plan consultancy contract, performance, etc.; and management of the in-house team, overseeing both business-as-usual activities and those Local Plan workstreams assigned to the in-house team.

Officers would be involved in the oversight of evidence base studies delivered by consultants. This would include attendance at inception meetings, the provision of council held data required for studies and review of deliverables. Officers would also be directly responsible for a set of business-as-usual activities and as well as the following Local Plan workstreams, many of which will be very resource intensive:

- Local Plan Timetable, including updates
- Gateway checks
- Governance of the plan with members
- Vision and objective development
- Housing and Employment Land Availability Assessment which will include visiting sites
- Town Centre Health Check which includes in-person surveys
- Site selection
- Housing Delivery Statements
- Running of consultations and analysis of consultation responses
- Drafting the spatial strategy and Local Plan policies
- Flexible Alignment Policy (new DtC) including Statement of Common Grounds
- Topic papers.

The split of tasks shown in Table 13 should be considered indicative and in practice responsibilities may shift between team members. For example, it may be necessary to redistribute studies between Planning and Economic Team members to reflect the skills of any newly recruited staff.

The table also identifies the assumed business-as-usual activities allocated to team members. It should be emphasised that this is an ambitious programme and resource plan, which is predicated on the assumption that Planning and Economic Team will not be able to address any additional tasks over and above that identified within the plan. Should additional unplanned business-as-usual activities arise, for example, in relation to a new or updated Neighbourhood Plan, it will be necessary to identify additional resources to undertake this task. Any diversion of resources will potentially jeopardise the delivery of the Local Plan within the tight timeframe. This is explored further in section 6.5 on risks and mitigation.

### ***Local Plan consultants***

The Local Plan consultants would be responsible for the day-to-day Local Plan management, in collaboration with Officers. This would include:

- Oversight of the programme, including any required updates.
- Reviews of progress and risk reporting.
- Technical evidence base studies to be delivered by the consultant team, including quality assurance checks.

The consultants would be directly responsible for the delivery of a wide range of technical evidence base studies, as detailed in Table 13. In addition, they would also contribute to many of the technical workstreams that would be delivered by a combined Council / consultant team. These include:

- Local Plan timetable
- Formal PID
- Vision development
- Development of spatial options and preferred growth strategy
- Site Selection
- Strategic site work
- Plan drafting for 1st public consultation
- Plan drafting for 2nd public consultation
- Plan monitoring framework.



**Table 13 Proposed future responsibilities / projects**

Key: [Red Box] – Local Plan consultants, [Dark Red Box] – Principal Planner (to be appointed), [Light Red Box] – Policy Planner (to be appointed), [White Box] – [Red Box]

Theme	Task	Lead role										Support role										Evidence base oversight / support										
Local Plan management	Overall local plan management																															
	Appointment and oversight of external consultants																															
	Local Plan programme																															
Plan initiation procedural requirements	Local Plan Timetable																															
	Gateway 1 Formal Project Initiation Document																															
Housing and employment evidence	Housing and Employment Land Availability Assessment (HELAA)																															
	Housing and Economic Development Needs Assessment, including Employment Land Supply (HEDNA)																															
	Gypsy, Traveller & Travelling Showpeople Accommodation Assessment (GTAA)																															
	Pitch Delivery Assessment (PDA)																															
Infrastructure evidence	Infrastructure Delivery Plan (Baseline & Schedule) (IDP)																															
	HCC Transport baseline & modelling																															
	Transport study																															
	Green and Blue Infrastructure Study																															
	Open Space, Playing Pitch & Built Facilities Assessment																															
Built environment evidence	Settlement hierarchy study																															
	Settlement boundary review																															
	Retail and Leisure Needs Study																															
	Town Centre Health Checks																															
	Design code																															
	Heritage Assessment (site level)																															
Natural environment evidence	Landscape Character Study																															
	Landscape Character Assessment (site level)																															
	Strategic Flood Risk Assessment (SFRA) Level 1																															
	Strategic Flood Risk Assessment (SFRA) Level 2																															
Whole plan assessments	Integrated Impact Assessment																															
	Habitats Regulation Assessment																															
	Whole Plan Viability Assessment																															
Plan production	Site selection																															
	Vision development																															
	Development of spatial options and preferred growth strategy																															
	Site Selection																															

Theme	Task	Lead role									Support role									Evidence base oversight / support								
		DH	MC	CT	AR	Pr	MH	Po	IW	DH	MC	CT	AR	Pr	MH	Po	IW	DH	MC	CT	AR	Pr	MH	Po	IW			
	Housing Delivery Statement																											
	Strategic site work																											
	Plan drafting for 1st public consultation																											
	Plan drafting for 2nd public consultation																											
	Plan monitoring framework																											
	Statement of Compliance																											
	Topic papers																											
	Collate and finalise documents for submission																											
	Policies Map																											
Consultation	Consultation software																											
	Consultation 1: organisation																											
	Consultation 1: analysis, responses and reporting																											
	On-going engagement																											
	Consultation 2: Organisation																											
	Consultation 2: analysis, responses and reporting																											
Flexible Alignment Test	Consultation Statement																											
	Meetings with partners																											
	Required evidence for test																											
Gateway checks	Statements of Common Ground																											
	Gateway 1																											
	Gateway 2																											
Examination	Gateway 3																											
	Examination																											
	5YHLS & Housing Delivery Test (HDT)																											
BAU - monitoring	Monitoring																											
	Authority Monitoring Report (AMR)																											
	Brownfield land register																											
	Self & custom build register																											
	SANG annual capacity monitoring																											
BAU - communications	Planning Policy Inbox																											
	FOIs and EIR																											
	Consultation database																											
	Website updates																											
	Communication updates																											
BAU - meetings	HIPOG																											
	Planning forum																											
	Meeting with Chief Executive																											
	Operational Management Group																											
	Climate change working group																											

Theme	Task	Lead role									Support role									Evidence base oversight / support								
		DH	MC	CT	AR	Pr	MH	Po	IW		DH	MC	CT	AR	Pr	MH	Po	IW		DH	MC	CT	AR	Pr	MH	Po	IW	
	Local Nature Recovery Strategy Group																											
	Coordination with GIS																											
BAU - other	Government consultations																											
	DM support																											

## 6.4 Programme

The provisional overarching programme for the production of a new Local Plan is presented in Table 14.

**Table 14 Local Plan programme key milestones**

Key Step	Time Period
Preparatory evidence gathering and scoping	August 2025 - February 2026
Notification of the start of the Local Plan process	February 2026
Scoping and early participation	February 2026 - June 2026
Gateway 1 (advisory)	June 2026
Plan vision and strategy development	June 2026 – December 2026
First consultation	January 2027 – February 2027
Evidence gathering and drafting the plan	March 2027 – June 2027
Gateway 2 (advisory)	June 2027 – July 2027
Engagement, proposing changes and submission of the plan	July 2027 – March 2028
Second consultation	October 2027 – November 2027
Gateway 3 (stop/go)	January 2028 – March 2028
Examination	March 2028 – September 2028
Finalisation and adoption	October 2028

This follows the 30-month Local Plan preparation framework set out by MHCLG (see section 2.2.6). The programme was designed to take into account wider factors such as LGR which have the potential to impact the preparation of the plan. The programme aims at submitting the plan for examination prior to the formation of unitary authorities in Hampshire, to ensure that development in the area is guided by an up-to-date blueprint through the LGR process.

Reflecting on the experience of other authorities that have already been through the unitary process, it is expected that the new unitary authority which will cover the Hart area will take forward the responsibility of the plan through Examination and adoption.

The programme presented in Table 14 and Table 15 is an extract of a more detailed programme which considers the timescales required to undertake evidence-base studies, inter-dependencies between studies and resourcing. The programme is based on the following assumptions:

- The Local Plan constitutes the only item on the service plan for the team throughout its production process.
- The team benefits from the current resources plus a full-time principal planner and a full-time policy planner.
- The team undertakes some of the tasks in-house but benefits from external expertise to undertake most of the evidence base studies and some of the Local Plan project management, as set out in the budget.

The programme is subject to a number of risks which have been identified in the risk register.



Table 15 Local Plan programme

	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Jan-28	Feb-28	Mar-28
<b>Project management</b>																																
Inception and procurement management meetings																																
<b>Local Plan key milestones / deliverables</b>																																
Preparatory evidence gathering and scoping																																
Notification of the start of the Local Plan process																																
Scoping and early participation																																
Flexible Alignment Policy Activities																																
Gateway 1 (advisory)																																
Plan vision and strategy development																																
First consultation																																
Evidence gathering and drafting the plan																																
Gateway 2 (advisory)																																
Engagement, proposing changes and submission of the plan																																
Second consultation																																
Gateway 3 (stop/go)																																
Submission																																
<b>Evidence base</b>																																
Housing and Employment Land Availability Assessment (HELAA)																																
Housing and Economic Needs Assessment (HEDNA)																																
Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA)																																
GTTS Pitch and Plot Delivery Assessment (GTTS PDA)																																
Infrastructure Delivery Plan (IDP)																																
Green and Blue Infrastructure Study																																
Open Space, Playing Pitch and Built Facilities Assessment																																
Transport and mobility																																
Retail and Leisure Needs Study																																
Town Centre Health Checks																																
Settlement Hierarchy																																
Settlement Boundary review																																
Design Code																																
Landscape character assessment																																
Flood Risk Assessment																																
Ecological assessment(s)																																
Landscape assessment(s)																																
Heritage assessment(s)																																
Whole Plan viability																																
Integrated Impact Assessment																																
Habitats Regulation Assessment																																

## 6.5 Budget and costs

The majority of the costs associated with the production of a new Local Plan will be related to staff time and the use of consultants. Other costs to be taken into consideration relate primarily to consultation process (e.g. specialist software, printing, hiring of premises for consultation events) and for the formal examination process (e.g. employing a programme officer, planning inspector fees, legal support).

A full profile of the anticipated costs for Local Plan production for the period 2025/26 to 2028/29 has been developed. In developing the indicative costs, the following assumptions have been made:

- Zero based budget, as per the direction of the S151 Officer.
- No allowance made for business-as-usual activities and associated costs, e.g. permanent staff salaries, existing service level agreements, costs accrued through meeting regulatory duties such as neighbourhood planning etc. This will be met through the existing planning policy budget, which the S151 Officer advised was separate to the Local Plan budget.
- A contingency of 10% built into the budget, which is considered to be reflective of the risks associated with the projects, which are particularly high given the large number of uncertainties regarding the on the new plan making framework and NDMP. This will also cover anticipated additional costs including the need to update evidence base studies following the release of new data, or the need to undertake further work that only becomes apparent as Local Plan production progresses.
- Service level agreement with East Hampshire for GIS, will cover the requirements associated with a move to more digital Local Plans. As well as the Policies Map, there will be a large GIS component underpinning Local Plan production for example, setting data standards for evidence base study outputs and GIS inputs for site selection.

It should be noted that the costs are necessarily broad brush given the unknowns around, for example:

- Full extent of plan making reform. Depending on when, or if changes, are brought forward, this may result in additional work either revisiting tasks or undertaking new ones, and equally the introduction of NDMP may lead to some reduction in workload.
- Detailed scope and split of work to be undertaken by Local Plan consultants versus Hart District Council planning policy officers.
- Exact scope of evidence base studies.
- Number of sites that will need to be assessed.
- Scale of engagement required with stakeholders around key issues (e.g. highways) or cross border strategic issues.
- Future transport modelling capabilities. Historically undertaken by Hampshire County Council, which will no longer exist after Local Government Re-organisation. It is not yet clear how modelling will be provided in the future, and at what cost, if any?
- Number of responses that will be received and require processing for any consultation event.
- Need for legal advice during plan production depending on what issues arise.

- Length of the Examination, and therefore the associated costs of the Inspector(s).

Where possible data has been benchmarked using published sources (e.g. Government's contract finder, PINS published day rates) and / or experience elsewhere, commissioning and delivering evidence base studies and local plans.

On the basis of the outlined assumptions, and assumed resource profile, the total cost of a new Local Plan is estimated as £2.1m, including 10% contingency and excluding permanent staff costs (Table 16).

**Table 16 Estimated Local Plan Costs**

Item	Costs per financial year, £000s			
	2025/26	2026/27	2027/28	2028/29
Local Plan	340	822	604	142
Contingency	34	82	60	14
Total	374	904	664	156

Note: may not sum due to rounding

## 6.6 Risks and mitigations

Over the course of the proposed programme, there are a range of risks that might affect the quality, cost and timings of delivering the Local Plan. A full risk register with identified mitigation measures has been developed and accompanies this report. This highlights the unmitigated risk score, as well as the risk score following appropriate mitigation, the mitigated risk score.

In summary, the main risks relate to:

- Changing legislation, policy and guidance: Any significant changes in any of these arenas has the potential to delay the overall programme and increase the costs of production for the Local Plan. As a new plan making system is part way through implementation, there are significantly more unknowns than was the case for the previous Local Plan production process. The Government has yet to confirm exactly when the new plan making system will be fully implemented and therefore when the new Hart Local Plan can formally begin.
- Local Government Reorganisation: These wider proposed changes have the potential to divert resource and are placing greater emphasis on fast Local Plan production in order that a plan can be submitted by April 2028. It also adds an additional layer of complexity since the new Local Plan will need to be in conformity with a yet unformed Combined Authority's Spatial Development Strategy, of which little is known about its contents or how and when it will be produced.
- Staff resources: Maintaining the core officer team, supported by targeted additional recruitment and specialist Local Plan consultants will be necessary to keep to the timetable set out in this report. Any challenges in securing these resources could lead to delay. Hart officers need to deliver business-as-usual activities as well as the Local Plan; if these increase in scope beyond that defined within the resource plan there is potential for delay to the programme.
- Technical skills: The process of producing a Local Plan requires access to a wide range of skills including planning policy, infrastructure, transport, water, flooding, heritage,



landscape, ecology, urban design, and viability. The timetable relies on the required expertise being available, either in-house or through the procurement of specialist advice or consultants.

- Evidence base: Careful project planning will be necessary to minimise the potential that the completion of evidence base work streams does not add unnecessary delay or costs to Local Plan production.
- Consultation, engagement and flexible alignment test: A robust approach to all of these elements will be necessary to meet legal requirements; alongside careful project planning to ensure that these processes do not derail the Local Plan programme.
- Finance: With many unknowns and areas of risk, it would be easy for Local Plan spending to rapidly increase. It will be necessary to prioritise spend, practice good project management for individual workstreams and undertake regular review of the overall budget.
- Governance: The 30-month local plan timetable is not met due to lengthy governance processes or decisions not being made in a timely fashion.

The risk register sets out appropriate mitigation measures to minimise the level or risk. This should be maintained as a live document throughout the lifetime of the project. Officers will need to keep senior leadership, and the proposed Local Plan Steering Group (see section 6.62), apprised of any issues as and when they arise.

## 6.7 Governance

Governance of the Council is an important component of the plan making process, and the governance of plan making should be clear from the start of the project to ensure that stakeholders are aware of who will take key decisions. The current governance structure of the Council is described below. The following section contains recommendations for the governance of the Local Plan.

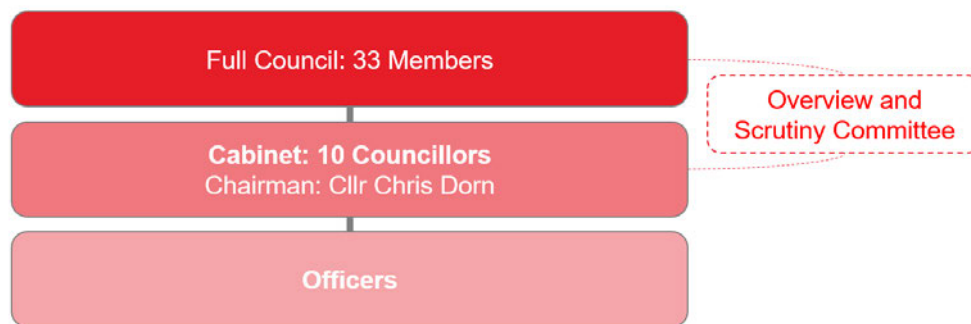
### 6.7.1 Existing governance arrangements

The existing governance arrangements for Hart are described in the adopted constitution, as required by section 37 of the Local Government Act 2000. Some of these processes are required by law and some are up for the Council to choose.

The Council is organised following a leader and cabinet model. Under this governance model, elected members are part of Full Council, which elects a leader. The leader then appoints members to Cabinet, the main decision-making body of the Council. There are also several committees that handle specific areas of Council business and report to Full Council. There is no committee dedicated to planning policy.

Operations of the Full Council, Cabinet and the various committees are scrutinised by the Overview and Scrutiny committee (see Figure 4). Full Council is responsible for the approval and adoption of the Local Plan, as outlined in paragraph 4.2.2 of the Constitution, *'[the council is responsible for] approving or adopting the policy framework [incl. the Local Plan], the budget, and any application to the Secretary of State in respect of any housing land transfer'*.

Figure 4 Organisational chart showing governance structure in Hart District Council



Each topic area within the Council is overseen by a portfolio holder who is responsible for overseeing the Council's work in this area. They also liaise between officers and elected Members. The portfolio holder has delegated powers to make most day-to-day decisions on the production of the Local Plan, including authorisation to proceed for consultations. Since May 2025, the portfolio holder for planning policy is Councillor Graham Cockarill. The portfolio holder is currently briefed by officers on the progress of the service plan every two-weeks.

### 6.7.2 Implications for the Local Plan

The Local Plan is a large project to be undertaken under a tight time constraint prescribed by central government. As such, the business-as-usual governance arrangements for the planning policy team may not be regular enough or agile enough to ensure oversight of the plan making process by Councillors. Equally it is important that the governance arrangements are not too onerous so that the Local Plan can progress at pace and have the greatest chance of meeting the ambitious timetable. It will be important to ensure that the right governance arrangements are in place by early Autumn to ensure that decisions can be made at the right times and that those decisions can be made expediently.

It is recommended that in setting up the governance arrangements for the Local Plan, the following are considered:

- the role and function of each of the Council's governance bodies (Overview & Scrutiny, Cabinet and Full Council) in relation to key milestones of the Local Plan.
- the day-to-day oversight of the Local Plan tasks, including monitoring of programme budget and risks.
- the frequency of engagement with Members, either through existing channels of communication and reporting, or through new channels.
- the potential need for exceptional meetings to accommodate the Local Plan programme.

It is common for Councils to set up a Local Plan steering group for the during of the Local Plan preparation to address some of these challenges. The make-up, frequency of meetings, and powers given to these groups vary but are usually agreed through terms of reference, which guide the work of the group through plan making.

The governance arrangements will need to strike a balance between the agility required to deliver a Local Plan within the 30-month programme and the need for democratic oversight. Consideration will need to be given to the implications for the resource plan and the budget.

The programme and resource plan are based on the assumptions that:

- Briefings to the Portfolio Holder on service plan progress remain on the existing footing of every two weeks.
- The draft Local Plan will go to Full Council once, prior to the second consultation. This is the version of the plan that will be used for the second round of public consultation, the Gateway 3 check and submitted for Examination. Experience elsewhere suggests that it is often helpful in terms of programme, if approval for the launch of the final consultation and the submission of the Local Plan is sought at the same Full Council meeting, if the constitution allows.

No further allowance for governance has been made within the programme and resource plan and any changes to the assumptions above will need to be reflected in the work programme.

### *Member engagement*

In addition to the formal governance arrangements, it is suggested that there could be various touchpoints within the Local Plan process that enable participation with a wider group of Councillors. These might include:

- Involvement in the early engagement prior to the publication of the notice to commence.
- Participation in workshops during plan production, for example, in relation to drafting the vision and objectives for the Local Plan or to discuss potential sites for the HELAA.
- Updates via any Councillor briefings regarding key milestones, in particular prior to the launch of public consultation.
- Participation at public consultation events.

## 7. Next steps

To deliver this ambitious timetable for the new Local Plan, there are various decisions and key actions that need to be made, the majority prior to September 2025. These are as follows:

- **Decision:** Agree whether to proceed with a new Local Plan on consideration of the balance of factors presented in this report, including associated risks. All other decisions and key actions will flow from this.
- **Decision:** Agree the resource plan, i.e. the recommended option of a combined team of Hart officers and Local Plan consultants.
  - **Key action:** Initiate recruitment for one principal planner and one policy planner.
  - **Key action:** Draft brief to appoint Local Plan consultants.
  - **Key action:** Launch procurement process for Local Plan consultants.
  - **Decision:** Appoint Local Plan consultants in November 2025.
- **Decision:** Agree proposed scope of work, as detailed in section 5.4, as this will form the basis for the brief for the Local Plan consultants and informs the budget decision.
- **Decision:** Agree the Local Plan budget.
- **Decision:** Agree the governance arrangements for Local Plan production.