

Hart Local Plan: Strategy and Sites 2016-2032
Proposed Submission Version

Duty to Cooperate Statement

February 2018

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Introduction

1. The purpose of this paper is to demonstrate how Hart District Council has met the requirements of the duty to cooperate in the production of the Hart Local Plan: Strategy and Sites 2016-2032 Proposed Submission Version.

What is the duty to cooperate?

2. In preparing local plans, local authorities must address strategic planning matters that cross administrative boundaries. The duty to cooperate places a legal duty¹ on local planning authorities, county councils in England and public bodies² to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

Strategic context

3. Hart District is situated in North East Hampshire. It is within a housing market area (HMA) and functional economic area (FEA) with Rushmoor and Surrey Heath Boroughs and is located within the Enterprise M3 Local Economic Partnership (EM3 LEP) area. It contains parts of the Thames Basin Heaths Special Protection Area which comprises sites throughout 11 authorities in Hampshire, Surrey and Berkshire and is a major constraint to development.

What are the strategic issues?

4. Following consultation with duty to cooperate bodies (see Appendix I) it was decided that the following matters should be addressed through the duty to cooperate. These are discussed in the following sections of this Statement.
 - Housing
 - Thames Basin Heaths Special Protection Area
 - Employment Land
 - Traveller site provision
 - Flood risk
 - Water supply and waste water
 - Infrastructure (Transport, Healthcare facilities, Education)

¹ The duty to cooperate was created in the [Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004](#).

² The Duty to Cooperate Bodies are prescribed in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) as amended by [The National Treatment Agency \(Abolition\) and the Health and Social Care Act 2012 \(Consequential, Transitional and Saving Provisions\) Order 2013](#). In addition, local planning authorities must also cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making.

Housing

What is the strategic issue?

5. The issue is to identify the relevant housing market area (HMA), establish the housing needs within the HMA, and to plan for sufficient delivery of homes across the HMA to meet the identified need.

Who has been involved and the arrangements for co-operation

6. The core partners are Rushmoor Borough Council (Rushmoor) and Surrey Heath Borough Council (Surrey Heath) which along with Hart District Council (Hart) are the authorities that comprise the HMA. Other authorities around Hart have expressed an interest in the matter but none have formally requested that Hart accommodates a demonstrated unmet need from their area.
7. Officers from the three authorities have met on numerous occasions and have established good working relationships. In addition to this the Hart, Rushmoor and Surrey Heath Joint Member Liaison Group (JMLG) provides the forum for discussions at Member level. The terms of reference for this group are at the end of Appendix 2 (see page 36).

How the issue has been addressed

Identifying the HMA

8. The housing market area was determined in 2013/14 when Rushmoor commissioned consultants to identify the HMA within which it is located. That study recommended the three authorities of Hart, Rushmoor and Surrey Heath work together as a single HMA.
9. Subsequent analysis undertaken for Hart and Surrey Heath supported this view and the three authorities agreed to work together as an HMA. Hart does have links with other areas reflecting the complex pattern of settlements in the wider area, but the evidence³ supports a pragmatic Hart/Rushmoor/Surrey Heath grouping. In the surrounding areas other local authorities have come together to work to their own HMAs.

Identifying housing need

10. Two Strategic Housing Market Assessments (SHMAs) have been prepared for the HMA, the first published in December 2014, the second published in November 2016. Both were commissioned jointly by the three authorities and were signed off at Member level by the JMLG. The SHMAs provide a total OAHN for the HMA as a whole and broken down by each authority.

³ The evidence base for this grouping is set out in the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment 2014-2032 (Wessex Economics, November 2016).

11. In September 2017 the Government published a consultation⁴ in which it sets out a proposed standard approach to determining local housing needs. The proposed methodology generates indicative housing numbers for the HMA based from 2016 which are lower for each authority than the OAHN figures from the SHMA.
12. The timing of the Rushmoor Plan submission means that its Plan will be assessed against the SHMA OAHN. The Hart and Surrey Heath plans follow after it and are expected to be assessed against the proposed standard methodology, in its final form.
13. Once the new methodology is in place it is assumed that the SHMA OAHN figures across the HMA will effectively be superseded as the basis for joint working and planning for new homes across the HMA as a whole. In other words, the objective of the HMA will be to ensure that the combined local housing needs for the three authorities (as determined by the standard methodology in its form) is met.

Addressing the housing need

14. The HMA authorities have agreed that in the first instance they will each aim to meet their respective OAHNs within their boundaries. Furthermore, in the event of any demonstrated and agreed shortfalls arising in one authority area, in the first instance any such shortfall will be addressed elsewhere in the HMA (see JMLG terms of reference at page 36 of Appendix 2).
15. Rushmoor submitted its Plan on 2 February 2018. Rushmoor is meeting its OAHN of 436 homes per annum (2014-2032) as defined in the 2016 SHMA, in full. Using the SHMA OAHN figures there is no surplus in the Rushmoor Plan that could be used to counter any shortfalls elsewhere in the HMA. However, compared to the indicative Government figures Rushmoor's Plan will over-deliver by approximately 3,800 dwellings over the period 2016-2032⁵.
16. Surrey Heath has indicated that it could have a potential shortfall against its Government figure of around 1,500 homes against its SHMA OAHN figure, or around 950 homes against its indicative Government figures. The Surrey Heath Plan is at an early stage and as such this figure has not yet been tested through public consultation or agreed with the HMA partners. Additional sites may become available through representations at the Regulation 18 stage, or new information could come to light that changes capacity assumptions on sites already accounted for. Surrey Heath's position is that it will endeavour to reduce that shortfall as the plan progresses.
17. Hart's housing target of 6,208 new homes (388 per annum) in its Local Plan Proposed Submission Version exceeds its indicative Government figure by 1,536 homes between 2016 and 2032. The actual planned supply of 6,346 exceeds the indicative Government figure by 1,674 new homes. Even against Hart's higher SHMA OAHN of 385 homes per

⁴ Planning for the right homes in the right places: consultation proposals, DCLG, September 2017

⁵ Rushmoor's indicative local housing need according to the Government's indicative figures is 294 homes per annum which amounts to 4,704 homes from 2016 to 2032. Based on paragraph 6.17 of the Rushmoor Plan (as proposed to be modified in the [Schedule of Proposed Modifications January 2018](#)) Rushmoor's housing supply at 31st March 2006 is 8,523 dwellings from 2016 to 2032 (completions in 2016/17=364; specific sites=7,739; plus windfall allowance=420). This results in a surplus of 3,819 homes against the Government's indicative housing figures published alongside Planning for the right homes in the right places.

annum the planned supply is just about sufficient to meet needs (although it is stressed that the Hart Plan is based on the new standardised approach).

18. Based on the Government's indicative figures, the HMA as a whole is planning to comfortably exceed identified needs. Together Hart and Rushmoor are planning for a surplus of around 5,300 new homes against the indicative Government figures. This is considerably larger than the potential and untested shortfall of 950 homes in Surrey Heath and provides a significant buffer to any changes to the Government figures increasing. Even if Rushmoor's apparent surplus is removed from the equation, Hart's over supply of around 1,500 homes exceeds Surrey Heath's potential shortfall.
19. It should also be noted that the housing supply figures for Hart referred to above do not include the commitment in Policy SS3 to plan for a new settlement through a separate development plan document. The new settlement is expected to start delivering new homes from about half way through the Plan period, providing yet further contingency to a need arising for Hart to take more growth. Hart also include a commitment to review the Plan if need be, for example as a result of duty to cooperate issues arising (see paragraph 427 of the Plan).

Strategic Land Availability Assessments – common methodology

20. Each authority in the HMA has undertaken a SHLAA⁶ or SHELAA⁷ to help determine whether or not it can meet its own housing needs. In 2015 the three authorities commissioned PAS (Planning Advisory Service) to audit the SHLAAs to ensure they were consistent with national guidance. It was not considered practical to undertake a joint SHLAA/SHELAA, but the audit recommended that the three authorities agree on a joint SHLAA methodology. In 2016 the three authorities agreed to base their SHLAAs on a standard methodology to enable consistent assessment of potential housing capacity.

What are the outcomes?

- Agreement on the HMA comprising Hart, Rushmoor and Surrey Heath administrative areas;
- Agreement on two SHMAs published in December 2014 and November 2016 respectively;
- Agreement on a standard methodology for SHLAAs/SHELAAs;
- A Statement of Common Ground between the three authorities that was submitted as evidence for the Rushmoor Plan (see Appendix 2).
- Emerging Local Plans for Hart, Rushmoor and Surrey Heath that together will significantly exceed by at least 4,000 homes the local housing need figure for the HMA set out in the Government consultation 'Planning for the right homes in the right places' September 2017. This does not include the proposed new settlement in Hart which will further boost housing supply within the Plan period.

⁶ Strategic Housing Land Availability Assessment

⁷ Strategic Housing and Employment Land Availability Assessment

Thames Basin Heaths Special Protection Area

What is the strategic issue?

21. The issue is the need to protect the integrity of the Thames Basin Heaths Special Protection Area (TBHSPA) whilst also planning for new development, particularly new housing.
22. The TBHSPA was designated in March 2005 and is protected from adverse impact by European and UK law. The TBHSPA is a network of heathland sites designated for their ability to provide a habitat for the internationally important bird species of woodlark, nightjar and Dartford Warbler. The TBHSPA spans 11 local authorities across Hampshire, Berkshire and Surrey.
23. Based on research, Natural England consider there is a cause and effect relationship between recreational use and Annex I heathland bird populations. This research indicates a number of mechanisms leading to impacts on breeding success, ranging from direct mortality (such as people trampling on nests), to nest abandonment or predation due to frequent flushing of birds (by people and dogs), or avoidance of disturbed areas. A range of wider effects are also associated with more general urban pressures, including uncontrolled heathland fires, fragmentation and pollution of the heaths, and cat predation.
24. As a result, Natural England objected to all planning applications for a net increase in housing within 5km of the SPA and this led to the refusal of planning permissions until mitigation measures could be put in place. Much of Hart lies within 5km of the TBHSPA (see Figure 4 on page 79 of the Local Plan Proposed Submission Version).
25. In order to 'unlock' future housing development the affected local authorities, Natural England and other interested bodies worked together through a Joint Strategic Partnership (JSP) to deliver a consistent approach to avoidance of harm and mitigation of impacts on the TBHSPA. The aim was to ensure that new homes could be delivered within the affected local authorities without harming the heathland habitats. This is the approach set out in saved South East Plan Policy NRM6, and in the Proposed Submission Local Plan (Policy NBE4) and involves the provision of, or contributions towards Suitable Alternative Natural Greenspace (SANG) and contributions towards Strategic Access Management and Monitoring measures (SAMM).

Who has been involved and arrangements for co-operation

Strategic working across the TBHSPA

26. The Joint Strategic Partnership Board Member authorities/agencies are:
 - Natural England (as the key statutory body)
 - Basingstoke and Deane Borough Council
 - Bracknell Forest Borough Council
 - Elmbridge Borough Council
 - Guildford Borough Council

- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- Rushmoor Borough Council
- Surrey Heath Borough Council
- Waverley Borough Council
- Woking Borough Council
- Wokingham Borough Council
- Hampshire County Council

27. In addition to the JSP, joint working on the TBHSPA takes place through the following related groups:

- Thames Basin Heaths Strategic Access Management and Monitoring Board
- Thames Basin Heaths Officer Group
- Thames Basin Heaths Access Management and Monitoring Partnership.

Strategic SANG Capacity

28. The core partners in terms of working together to deliver and share SANG capacity are:

- Rushmoor BC
- Surrey Heath BC
- Hampshire CC
- Enterprise M3 LEP in terms of funding/loan opportunities

Habitat Regulation Assessment

29. The key partner in terms of the Habitat Regulations Assessment is Natural England.

How the issue has been addressed

Engagement with all authorities affected by the TBHSPA

30. As a member of the JSP, the Council has been part of a continuous engagement process on issues related to the TBHSPA since 2005. The Partnership includes adjoining local authorities, Natural England and other advisory bodies such as the RSPB. The JSP Board (made up of local authority Councillors) and the officers group meet at least twice a year. In addition, the Council is represented by officers on the Strategic Access Management and Monitoring Group which looks more specifically at access management and monitoring, and by Members on the Thames Basin Heaths Strategic Access Management and Monitoring (SAMM) Board. The whole approach to SANG and SAMM mitigation is administered through these arrangements, with monitoring, funding, and ongoing policy and practical issues being discussed and addressed.

31. JSP members have also been consulted on the Draft Thames Basin Heaths Special Protection Area Policy set out in the Draft Local Plan, April 2017.

Delivering strategic SANG

32. As well as joint work on the policy approach, a great deal of joint work has taken place on the provision of strategic SANG to enable the delivery of the homes needed, not just in Hart, but across the HMA. Both Rushmoor and Surrey Heath have fewer options than Hart does for SANG provision and they are to some extent reliant on SANG provided in Hart to mitigate housing development in their areas.
33. Hart has worked with Rushmoor and Surrey Heath, and Hampshire County Council to provide a SANG at Hawley Meadows/Blackwater Park which serves Hart, Rushmoor and Surrey Heath. A Memorandum of Understanding (MoU) relating to this was signed in 2010. Hart relinquished some of its original share of the SANG capacity to help Rushmoor and Surrey Heath who had used up their share (see [Cabinet Report 17th July 2014 Paper D Release of Spare Capacity at Hawley Meadows SANG to Rushmoor and Surrey Heath Councils](#)).
34. In November 2017, Hart and Rushmoor signed a Memorandum of Agreement⁸ (MOA) to facilitate developments in Rushmoor through the provision of capacity from SANG in Hart. This MOA enables developments in Rushmoor access to Suitable Alternative Natural Greenspace (SANG) capacity in Hart District as habitat mitigation for 3,600 people (around 1,500 new homes).
35. Hart has an informal agreement with Basingstoke & Deane BC that if they ever need SANG that they will be able to access SANG in Hart unless it would jeopardise Hart's own planning objectives, which is unlikely.

Habitat Regulations Assessment

36. The Council has engaged with Natural England over the preparation of its HRA. Comments were received on a draft HRA which were taken on board in preparing the final version. The HRA concludes that the recreational impacts of proposed development on European sites can be avoided or mitigated. It also concludes that air quality is not likely to cause a significant effect on the SPA.

What are the outcomes?

37. The key outcome is the agreement and implementation between partners of a package of measures which enable the delivery of new housing within the relevant local authorities, including Hart District whilst protecting the integrity of the TBHSPA.
38. In addition, a joint approach to strategic SANG capacity has enabled housing delivery across the HMA:
 - At Hawley Meadows shared with Rushmoor and Surrey Heath and subsequent redistribution of SANG capacity to help Rushmoor and Surrey Heath deliver the homes they need in their areas;

⁸ See Hart Cabinet 6 July 2017 Paper F BRAMSHOT FARM SANG – MEMORANDUM OF UNDERSTANDING WITH RUSHMOOR BOROUGH COUNCIL and minutes of that meeting available at https://www.hart.gov.uk/sites/default/files/4_The_Council/Council_meetings/M_Archive/17%2007%20Cabinet.pdf

- Memorandum of Agreement between Hart and Rushmoor enabling the allocation of SANG capacity in Hart to support developments in Rushmoor Borough (about 1,500 new homes).

39. Other outcomes are:

- The development of, and agreement to, the Thames Basin Heaths Special Protection Area Delivery Framework in 2009;
- The development and adoption of Policy NRM6 in the South East Plan; and A Memorandum of Understanding for the collection of Strategic Access and Management (SAMM) contributions;
- The development of Policy NBE4 in the Local Plan Proposed Submission Version;
- Preparation of a Habitat Regulations Assessment in liaison with Natural England.

Employment Land

What is the strategic issue?

40. Hart is located within the Enterprise M3 Local Economic Partnership area, and within the Hart, Rushmoor Surrey Heath Functional Economic Area (FEA).
41. Planning Practice Guidance (PPG) requires authorities to assess their economic development needs working with other local authorities in the relevant functional economic market area (FEA).
42. The strategic issue is to understand the need for employment land and floorspace across the FEA and to ensure sufficient employment land is available to meet those needs.

Who has been involved and arrangements for co-operation

- Rushmoor Borough Council (Rushmoor) and Surrey Heath Borough Council (Surrey Heath) as FEA partners.
 - The Enterprise M3 Local Economic Partnership (EM3LEP).
43. Other authorities around Hart have expressed an interest in the matter given the complex linkages that exist with adjoining areas, but no adjoining authorities have queried the extent of the FEA that Hart is working to, and none have requested that Hart accommodates a demonstrated unmet need for economic development from their areas.
44. The Hart/Rushmoor/Surrey Heath Joint Member Liaison Group (JMLG) provides a forum for monitoring the ELR and deciding upon any appropriate course of action.

How the issue has been addressed

45. Hart, Rushmoor and Surrey Heath have a history of working together on planning for employment land. A Joint Employment Land Review for the three authorities was published in 2009, prior to the NPPF and the Duty to Cooperate, to inform the local plans in preparation at that time.

46. In light of the NPPF and the Duty to Cooperate, and guidance referring to functional economic areas (FEAs), the Council commissioned a study to establish the functional economic area in which it sits for the purposes of preparing a local plan. In preparing the report neighbouring authorities and key economic stakeholders were consulted during June/July 2014.
47. The final report: [The Hart Functional Economic Area Analysis, August 2014](#) presents a number of conclusions and recommendations to be taken forward in planning for economic development. One key recommendation was that *“There is an absolute requirement for Hart District Council to work closely with Rushmoor Borough Council and Surrey Heath Borough Council.”*
48. Subsequently both Rushmoor and Surrey Heath published their own FEA studies. All three studies supported a FEA comprising Hart, Rushmoor and Surrey Heath, consistent with the Housing Market Area, albeit economic linkages do exist with other areas.
49. In mid-2014 Hart, Rushmoor and Surrey Heath began work on a new Joint Employment Land Review for the FEA, published in June 2015. The ELR process included consultation with numerous stakeholders including the EM3LEP, other Duty to Co-operate partners, commercial agents and developers.
50. During the process of preparing the ELR, the Hart, Rushmoor and Surrey Heath JMLG, which was originally set up to cooperate solely on housing matters, amended its Terms of Reference to include planning for economic development across the FEA (see Appendix 2 page 36).
51. In September 2015 the JMLG took the decision to update the ELR in parallel with an update to the SHMA. The new ELR (December 2016) was approved by the JMLG and has led to policies in the local plan that protect strategic and local employment sites and encourage new employment development on suitable sites not only in settlements but also within the countryside where justified and where appropriate (see Policies ED1, ED2 and ED3).
52. The Council is a member of joint working partnerships across the EM3LEP including the Joint Leaders Board and is actively involved in wider LEP activities including the preparation of a new Industrial strategy. EM3LEP were consulted on the Regulation 18 Draft Local Plan but did not make comment.
53. Also of note is that Economic Development officers (EDOs) from the three FEA authorities work closely with each other and with Hampshire County Council, with other EDO's across Hampshire and through the EM3LEP EDO Group.

What are the outcomes?

54. The main outcomes are:
 - An updated employment evidence base (ELR, 2016) that all three authorities in the FEA have agreed;

- Rushmoor and Surrey Heath both supported the approach to employment land set out in the Regulation 18 Draft Local Plan⁹.
- Policies ED1, ED2 and ED3 in the Hart Local Plan that protect existing and encourage new employment sites where appropriate, a similar approach to that taken in the Rushmoor Plan and reflecting the recommendations in the ELR.

Traveller site provision

What is the strategic issue?

55. To identify and meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.
56. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. To assess the need for travellers in the district, an up to date Gypsy and Traveller Accommodation Assessment (GTAA) has been carried out which assesses current and future need for Gypsy and Traveller and Travelling Showpeople accommodation in Hart for the period 2016–2032.

Who has been involved and arrangements for co-operation

57. The following authorities which were engaged on the process of preparing a Gypsy and Traveller Accommodation Assessment (GTAA):
 - Hampshire County Council (Gypsy Liaison Officer)
 - Rushmoor Borough Council
 - Surrey Heath BC
 - Basingstoke & Deane BC
 - Bracknell Forest BC
 - East Hampshire DC
 - West Berkshire BC
 - Waverley BC
 - Wokingham BC

How the issue has been addressed

58. An up to date GTAA was commissioned in 2016 to establish the accommodation need for Gypsies, Travellers and Travelling Showpeople in Hart. The study provides the evidence base enabling the Council to comply with its requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework 2012, Planning Practice Guidance 2014, and Planning Policy for Traveller Sites 2015 and the Housing and Planning Act 2016.

⁹ Rushmoor's response available at https://www.hart.gov.uk/sites/default/files/1_Residents/EM241%20-%20Rushmoor%20Borough%20Council.pdf ; Surrey Heath's response at https://www.hart.gov.uk/sites/default/files/1_Residents/EM235%20-%20Surrey%20Heath%20Borough%20Council.pdf

59. In preparing that study Hart's neighbouring authorities were engaged through telephone interviews to establish their need and highlight any core issues around gypsy and traveller provision in adjoining areas. Hampshire County Council's Gypsy Liaison Officer was represented on the GTAA Steering Group and provided advice throughout the commission. No cross-border issues were identified.
60. The GTAA concluded for Hart that the overall level of additional need for those households that meet the new definition of a Gypsy or Traveller is for 'minus 5' additional pitches (i.e. there is surplus supply of 5 pitches); no additional plots are required for travelling showpeople and there is no proven need to consider any new transit provision at this time.

What are the outcomes?

- An updated GTAA (2016) which takes account of the revised definition in the 'Planning Policy for Traveller Sites' (2015);
- Policy H5: Gypsies, Travellers and Travelling Showpeople in the Hart Local Plan Proposed Submission Version.

Flood risk

What is the strategic issue?

61. Flood risk is an issue that has the potential to cross administrative boundaries, where development in one area could potentially increase flood risk in another area.
62. The National Planning Policy Framework (NPPF) (paragraph 166) requires that the evidence base for the Local Plan includes a Strategic Flood Risk Assessment (SFRA). The SFRA provides the framework for applying the sequential and exception tests in the district. It is important to ensure that in allocating land or determining applications, development, where possible, is located in areas at lowest risk of flooding.

Who has been involved and arrangements for co-operation

63. The key partners are:
 - Environment Agency (EA)
 - Hampshire County Council: Lead Local Flood Authority (HCC)
 - Thames Water

How the issue has been addressed

64. The Council has prepared an up to date Strategic Flood Risk Assessment (December 2016). It supersedes a Blackwater Valley SFRA for Hart DC and Surrey Heath BC published in 2008.

65. At the time of commissioning the 2016 SFRA other neighbouring authorities in the Blackwater Valley area were invited to participate in a joint study but none took up the opportunity. The SFRA was therefore prepared with the involvement of the EA, HCC and Thames Water.
66. The Council's SFRA (December 2016) provides information on the probability of flooding from various sources, such as fluvial, surface water, sewer, groundwater and artificial sources. It should be used alongside the Environment Agency's flood risk maps and recently updated Climate Change Allowance.
67. In preparing the local plan the Council has followed the sequential and exception tests using the SFRA (see Sequential Test and Level 2 SFRA supplements published with the SFRA available at <https://www.hart.gov.uk/Evidence-base>).
68. With regards to policy formulation, the Plan includes a specific policy on flood risk (Policy NBE6). The Council informally consulted the EA and HCC prior to Publication and received no objections or comments on that policy. HCC did raise some comments regarding water management and the Basingstoke Canal under Policy SS3 (new settlement) which will be considered in more detail when the new settlement DPD is prepared.
69. In addition to the SFRA, and responses to public consultations, the EA responded to a request made in April/May 2016 for information regarding SHLAA sites for over 150 dwellings.

What are the outcomes?

- Strategic Flood Risk Assessment SFRA (December 2016) - signed off by the EA. This has informed subsequent work on sequential test and exception test at both the Regulation 18 Draft Plan stage and at the Regulation 19 Publication Stage.
- Policy NBE6: Managing Flood Risk

Water supply and water quality

What is the strategic issue?

70. The Local Plan sets the level and location of development proposed between 2016 and 2032. As such it is important to identify the potential impacts of delivering the Local Plan on the security of water supply and any impacts resulting from increased volumes of waste water on water quality.

Who has been involved and the arrangements for co-operation

- Rushmoor Borough Council
- Surrey Heath
- Environment Agency
- Natural England
- Thames Water

- South East Water
- Affinity Water

71. Cooperation has centred on the production of a water cycle study (see below). A Steering Group to oversee the production of the WCS was set up comprising the three authorities of Hart, Rushmoor and Surrey Heath which together jointly commissioned the study, Thames Water and South East Water. The EA, Natural England and Affinity Water did not form part of the steering group but were consultees to the study.

How the issue has been addressed

72. Following advice from the Environment Agency (EA) the Council undertook a water cycle study to fully understand the issues of water supply, waste water and the Water Framework Directive that could impact on the local plan. The study was commissioned jointly with Rushmoor and Surrey Heath to cover all three authorities.
73. As key partners the relevant water companies who operate within Hart, Thames Water Utilities Limited (TWUL) and South East Water Limited (SEWL,) in addition to the EA, Natural England and Affinity Water were involved throughout preparation of the WCS.
74. Following agreement to its content by all stakeholders the report was finalised and published in May 2017.

What are the outcomes?

75. The joint WCS with Surrey Heath and Rushmoor has been agreed by all parties informed in its production. It has been used to inform preparation of the Local Plan (Policy NBE7 Water Quality and Policy NBE8 Sustainable Water Use in particular) in addition to the Infrastructure Delivery Plan.

Infrastructure

76. The following sections summarise the co-operation that has taken place on the key infrastructure issues of transport, healthcare facilities and education. These issues have the potential for cross boundary impacts and all involve cooperation with duty to cooperate bodies.

Transport

77. Engagement on transport matters has for the most part been with:
- Hampshire County Council (which has responsibility for the local road network and for preparing the local transport plan) and
 - Highways England (which has responsibility for the strategic road network).
78. Some adjoining local planning authorities and highway authorities have expressed an interest in the issue given the possibility of impacts arising in adjoining areas.

79. The focus for cooperation has been the preparation of a transport assessment (TA) to support the Local Plan (see below). In addition, HCC has provided a view on transport issues associated with strategic sites which fed into the site assessment work being done at the time by consultants Adams Hendry.

Transport Assessment

80. The TA identifies the scale of impacts on the transport networks associated with the local plan growth, including areas beyond Hart's boundary, and identifies potential mitigation measures.
81. The choice of using the North Hampshire Transport Model was made following discussions with Hampshire County Council. The brief for the TA was shared with both HCC and Highways England prior to the study commencing. The inception meeting for the project included representatives from HCC. HCC and HE have been involved throughout the preparation of the TA including a meeting to consider the draft outputs of the Stage 1 and 2 modelling held in December 2017.
82. The TA has informed the Infrastructure Delivery Plan published alongside the Plan. The TA is available on the Council's evidence base page at <https://www.hart.gov.uk/Evidence-base>.
83. The Council will continue to work with HCC, HE and adjoining areas, particularly Rushmoor BC, with regards potential future infrastructure improvements, with a focus on M3 junctions 4a and 5 where the most significant issues have been identified. Junction 4a in particular is a cross boundary issue in that it serves both Hart and Rushmoor and growth in both areas is likely to impact on that junction.

Healthcare facilities

84. It is important that adequate health care facilities are provided to support planned housing development. The main partners the Council has worked with throughout plan preparation are the two Clinical Commissioning Groups (CCGs) that operate within Hart:
- North East Hampshire & Farnham CCG which covers eastern Hart including Fleet, Yateley and Blackwater; and
 - North Hampshire CCG which covers the more rural western part of Hart.
85. Engagement has also taken place through the Hart Health & Wellbeing Board.
86. The Council has consulted the CCGs and other relevant statutory bodies at all public consultation stages throughout the plan making process. It has also engaged proactively through face to face meetings, including a meeting on 10th February 2015 with both the CCGs, the Frimley Park Foundation Trust, the adjoining planning authorities of Rushmoor BC, Waverley BC, and Hampshire County Council. The main outcome from that initial meeting was a greater understanding of each other's roles and responsibilities as a platform for improved engagement going forward.

87. Over the course of plan preparation co-operation has largely taken the form of an ongoing dialogue to enable the CCGs to understand how much development is being planned and where, and from the Council's point of view, to seek CCG input preparing an Infrastructure Delivery Plan, and shaping site allocation policies. This is particularly true of the NEH&F CCG which is having to plan for the significant increases in housing across its area, which includes Fleet, Yateley and Blackwater in Hart, but also Farnborough and Aldershot in Rushmoor, and Farnham in Surrey. It is also seeking to deliver strategic changes to the way services are provided.
88. Discussions focussed on the CCG's Estates Strategy and what options were being considered for re-configuring service provision and increasing capacity. The Council assisted the CCG in that process, identifying potential sites and providing feedback on sites suggested by the CCG.
89. The result is that the CCG has been able to make informed decisions on which sites to invest in to improve service delivery, achieve increased efficiencies and increase capacity to support growth. It is understood that the CCG will invest, and reconfigure service provision at the Fleet Community Hospital site and in existing GP surgeries to enable their modernisation and expansion. In addition, it is expected that the Hartland Village development (Policy SS2) will make a significant financial contribution to health care facilities off-site.
90. The co-operation has informed the preparation of the Infrastructure Delivery Plan and the CCG's strategy. Moving forward, the key area for the Council to look at will be working with the CCGs, particularly the NHCCG, on the proposed new settlement in the Murrell Green/Winchfield area of search (Policy SS3).

Education

91. The key issue is to ensure adequate school places are available in light of the planned housing growth in Hart (although it should be recognised that housing growth is not the only factor that influences forecasts for demand for school places).
92. The Council has engaged with HCC as the Local Education Authority throughout the plan-making process, providing them with an opportunity to comment on alternative strategies and the larger potential development sites. Numerous meetings have been held at officer level and a productive dialogue has been established. In addition HCC has held briefing sessions for Hart Members.
93. The dialogue with HCC has helped to identify where new or expanded education facilities will be required as part of their annual review of pupil place planning. Consequently, the Infrastructure Delivery Plan sets out the key school expansion and new school projects required to provide adequate school places alongside planned housing growth.
94. This has also informed Policy I8 which requires land to be safeguarded against development to allow the expansion of Robert May's School in Odiham and Calthorpe Park School, Fleet.

95. The Council will continue to liaise with HCC, in its capacity as the LEA, as a consultee on planning applications and on preparation of further Development Plan documents. The proposed new settlement in Policy SS3 will clearly be an important matter for Hart to engage HCC on given the aspiration for a new secondary school associated with that development.
96. Where necessary the Council will also provide comments on HCC documents including the Hampshire School Places Plan and the Hampshire Strategic Infrastructure Statement.

APPENDIX I Scoping the strategic issues

In August 2014 the Council undertook a scoping exercise to establish what the strategic issues are for Hart, and to help gauge which duty to cooperate bodies are relevant to each issue. The table below was provided as a basis for consultation with the relevant duty to cooperate bodies, the local enterprise partnership and the local biodiversity partnership.

The consultation ran from 14th August 2014 to 10th October 2014 in parallel with a consultation on a Housing Development Options Paper. The subsequent table sets out the comments that were received on the duty to cooperate scoping exercise.

ORIGINAL DUTY TO COOPERATE SCOPING TABLE (AUGUST 2014)

Issue	Suggested partners
1. Mitigating the effects of new housing in the vicinity of the Thames Basin Heaths Special Protection Area	<ul style="list-style-type: none"> • Hart District Council • Rushmoor Borough Council • Surrey Heath Borough Council • Waverley Borough Council • Guildford Borough Council • Bracknell Forest Borough Council • Woking Borough Council • Wokingham Borough Council • Elmbridge Borough Council • Runnymede Borough Council • Royal Borough of Windsor and Maidenhead • Hampshire County Council • Surrey County Council • Natural England • Enterprise M3 LEP
2. Meeting the objectively assessed need for housing	<ul style="list-style-type: none"> • Hart District Council • Surrey Heath Borough Council • Rushmoor Borough Council • Homes & Community Agency <p>In the event that housing needs cannot be met within this Housing Market Area (HMA), local authorities in HMAs that adjoin the Hart/Rushmoor/Surrey HMA will need to be approached.</p>

Issue	Suggested partners
3. Meeting the needs of Travellers for Transit Sites.	<ul style="list-style-type: none"> • Hart District Council • Rushmoor Borough Council • Basingstoke & Deane Borough Council • Hampshire County Council <p>We anticipate that permanent pitch provision will be dealt with by individual authorities meeting their own needs, with the possible exception of Rushmoor where under the withdrawn Core Strategy, Hart agreed to take their single pitch need.</p>
4. Meeting the need for employment land across the functional economic area	<p>Core partners:</p> <ul style="list-style-type: none"> • Hart District Council • Surrey Heath Borough Council • Rushmoor Borough Council • Enterprise M3 LEP <p>Other partners:</p> <ul style="list-style-type: none"> • Basingstoke & Deane Borough Council • Bracknell Forest • Wokingham • Waverley • Guildford • East Hampshire • Windsor & Maidenhead
5. Meeting the need for Retail & Leisure across the functional economic area	<p>Core partners:</p> <ul style="list-style-type: none"> • Hart District Council • Surrey Heath Borough Council • Rushmoor Borough Council • Enterprise M3 LEP <p>Other partners:</p> <ul style="list-style-type: none"> • Basingstoke & Deane Borough Council • Bracknell Forest • East Hampshire • Guildford • Reading Borough Council • Wokingham • Waverley
6. Infrastructure: Mitigating the impacts of development on the strategic and local highway network and on public transport networks	<ul style="list-style-type: none"> • Highways Agency • Hampshire County Council (Highways Authority) • Office of Rail Regulation <p>Potentially other local authorities depending on results of transport assessment work, most likely to be:</p> <ul style="list-style-type: none"> • Surrey County Council, • Wokingham Borough Council, • Bracknell Forest Council, • Basingstoke & Deane Borough Council • Waverley Borough Council

Issue	Suggested partners
	<ul style="list-style-type: none"> • Surrey Heath Borough Council • Rushmoor Borough Council, • Waverley Borough Council • East Hampshire District Council
7. Infrastructure: Meeting Education needs	<ul style="list-style-type: none"> • Hampshire County Council (Education Authority)
8. Infrastructure: Meeting Health needs	<ul style="list-style-type: none"> • North Hampshire Clinical Commissioning Group • North East Hampshire & Farnham CCG

SUMMARY OF RESPONSES TO THE DUTY TO COOPERATE SCOPING EXERCISE

Duty to Co-operate Body	Summary of comments received
Basingstoke & Deane District Council	<ul style="list-style-type: none"> • Issue 1 - B&D should be listed as a partner in relation to 'Mitigating the effects of new housing in the vicinity of the TBHSPA'. • Issue 2 – Meeting objectively assessed need for housing – this is wider than just meeting OAN but also identifying the OAN in the first instance - B& D should be listed as a relevant body. • Issue 4 – Employment - Do not consider B&D to be a partner involved in this issue. • Issue 5 – Retail and Leisure – this has not been raised previously as a strategic issue between the two authorities. • May also be helpful to include in the table all the relevant DTC prescribed bodies as set out in the relevant Regulations.
Bracknell Forest Borough Council	<ul style="list-style-type: none"> • No response received
Civil Aviation Authority	<ul style="list-style-type: none"> • No response received
Enterprise M3 Local Enterprise Partnership	<ul style="list-style-type: none"> • TBHSPA – endorses the key partners identified • Housing need – would be helpful to set out how Hart will engage on a wider network of partners including Enterprise M3, on relevant issues to housing. • Employment needs across the functional economic area – endorse the list identified. May be appropriate to include the Thames Valley LEP and Reading Borough Council in this list, and also Woking, Runnymede and West Berkshire Councils. • Retail and leisure needs – comments as for employment above. • Transport issues – with the introduction of the Local Growth Fund in 2015/16 it will be important that Enterprise M3 is

Duty to Co-operate Body	Summary of comments received
	engaged in discussions on this issue, particularly where infrastructure funding is required to unlock growth. Might also consider whether to involve Network Rail and the Train Operating companies in discussions.
English Heritage	<ul style="list-style-type: none"> No response received
Environment Agency	<ul style="list-style-type: none"> The scoping tables do not identify the impacts that may occur by meeting development needs and therefore the mitigation required. The impact on the environment in terms of water supply, wastewater, flood risk and biodiversity may require assessment and improvement in the infrastructure.
Hampshire County Council	<ul style="list-style-type: none"> Agree with the identification of joint issues between HCC and HDC with the addition of 'Minerals Safeguarding'.
Highways Agency	<ul style="list-style-type: none"> The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. It is noted that much of the evidence is to be updated and have no further comments at this time.
Homes and Community Agency	<ul style="list-style-type: none"> No response received
The Mayor of London	<ul style="list-style-type: none"> No response received
Natural England (NE)	<ul style="list-style-type: none"> No response received
North East Hampshire & Farnham Clinical Commissioning Group	<ul style="list-style-type: none"> The CCG would welcome the opportunity to discuss a range of issues such as the required health infrastructure to meet any housing/population demand as this impacts on local GP practice and the additional demand this puts on doctors and staff to deliver health care services to the local population. Would also like to see practices and patients engaged to develop a common understanding of the implications on the health infrastructure. The CCG is also developing a Primary Care Strategy and it will be important that the Hart Local Plan and the PCS dovetail. Details are provided of the providers of health care within the CCG area.
North Hampshire Clinical Commissioning Group	<ul style="list-style-type: none"> No response received
Office of Rail Regulation	<ul style="list-style-type: none"> No response received
Runnymede Borough Council	<ul style="list-style-type: none"> Encouraged to note that other local authorities in neighbouring HMA's will need to be engaged when consideration is being given as to whether the Hart/Rushmoor/Surrey Heath HMA is capable of meeting its own housing needs.
Rushmoor Borough Council	<ul style="list-style-type: none"> Agreed that the issues identified by Hart are the relevant cross boundary issues that affect Hart and Rushmoor.
Spelthorne Borough Council	<ul style="list-style-type: none"> Currently undertaking a Strategic Housing Market Assessment (SHMA) with Runnymede BC which lies adjacent to the Hart, Rushmoor and Surrey Heath Housing Market Area (HMA).

Duty to Co-operate Body	Summary of comments received
	Initial findings consider that links between the two areas are very limited and confined to Runnymede/Surrey Heath only.
Surrey County Council	<ul style="list-style-type: none"> • Welcomed our inclusion within the suggested list of partners for Issue 6 Infrastructure: Mitigating the impacts of development on the strategic and local highway network and on public transport networks. • Could potentially be included with regard to issue 1. Mitigating the effects of new, housing in the vicinity of the Thames Basin Heaths Special Protection Area and also issue 7. Infrastructure: Meeting Education needs.
Surrey Heath Borough Council	<ul style="list-style-type: none"> • 2. Meeting the objectively assessed need for housing - Include list of adjoining authorities similar to approach in Issue 4 • 6. Infrastructure: Mitigating the impacts of development on the strategic and local highway network and on public transport networks - Include the LEP. There is also the possibility of the Blackwater Valley Network being re-introduced to consider strategic infrastructure. You may want to reference this group.
Waverley Borough Council ¹⁰	<ul style="list-style-type: none"> • No problems with Hart DtC Scoping • Include Waverley in discussions on CCG
West Berkshire	<ul style="list-style-type: none"> • Agree that West Berkshire Council does not need to be involved at this stage. • It is worth noting however that a very small area in the south east of West Berkshire lies within 7km of the boundary of the Thames Basin Heaths Special Protection Area (SPA). Within this part of the District we use the Thames Basin Heaths SPA Delivery Framework (produced by the Thames Basin Heaths Joint Strategic Partnership) to guide assessment and any avoidance or mitigation measures that may be needed from potential new development. The provision of Suitable Alternative Natural Greenspace (SANG) to attract new residents away from the SPA is a key part of these avoidance measures, together with strategic access management on the SPA and monitoring. Since the level of development expected to come forward in this area of the District is extremely low (no potential new developments have come forward this year, for instance), we will explore opportunities for cross boundary working in this regard when appropriate.
Woking Borough Council	<ul style="list-style-type: none"> • The only strategic issue is that of the Thames Basin Heaths SPA. Woking would therefore advise that the preferred option should reflect the TBH Delivery Framework which both authorities are signed up to.
Wokingham Borough Council	<ul style="list-style-type: none"> • In respect of any further strategic/cross boundary matters we would just like to highlight that all of the Berkshire authorities, including Wokingham, have made a commitment to the commissioning of a Strategic Housing Market Assessment, this

¹⁰ These comments were made at a meeting with Waverley in January 2015

Duty to Co-operate Body	Summary of comments received
	<p>is currently out to tender and an appointment is anticipated early in the New Year. It would therefore seem be appropriate to include Wokingham Borough Council as a DtC partner within the 'meeting OAN for housing' issue.</p> <ul style="list-style-type: none"> • The Thames Valley Local Enterprise Partnership will be involved in the Berkshire SHMA, in particular in relation to the Thames Valley LEP Strategic Economic Plan which encompasses economic and employment growth plus also the linkages this has with transport issues. Wokingham Borough Council are actively involved with the Thames Valley LEP.

APPENDIX 2 Rushmoor/Hart/Surrey Heath Statement of Common
Ground January 2018



Statement of Common Ground

**On matters relating to housing delivery, employment land and the Thames
Basin Heaths Special Protection Area**

as agreed between
Rushmoor Borough Council,
Hart District Council and
Surrey Heath Borough Council

24th January 2018

1. Introduction

- 1.1. This Statement of Common Ground has been prepared jointly between Rushmoor Borough Council (“Rushmoor” or “the Council”), Hart District Council (“Hart”) and Surrey Heath Borough Council (“Surrey Heath”). It sets out the agreed position between the parties on the strategic matters of housing, economy and the mitigation of impacts on the Thames Basin Heaths SPA, and helps to demonstrate how Rushmoor has complied with the Duty to Co-operate in preparing the submitted Rushmoor Local Plan.

2. Background

- 2.1. Rushmoor is preparing a new Local Plan. The Rushmoor Local Plan will guide the location, scale and type of future development in Rushmoor Borough up to 2032, as well as providing detailed development management policies to be used in determining planning applications. Once adopted, the Local Plan will replace two existing planning documents; the Rushmoor Core Strategy (adopted 2011), and “saved” policies in the Rushmoor Local Plan Review, 2000.
- 2.2. The Council has a legislative duty to co-operate on planning issues that cut across administrative boundaries, particularly those relating to strategic priorities set out in paragraph 156 of the National Planning Policy Framework. The Council has therefore worked with adjoining local authorities and other agencies to plan at a level that is wider than just Rushmoor’s administrative boundary for certain land uses, most notably housing and employment.
- 2.3. Rushmoor and Hart are districts located within North Hampshire and Surrey Heath is located within the County of Surrey. All three authorities share an administrative boundary.
- 2.4. Surrey Heath Borough Council adopted the Core Strategy and Development Management Policies (2011-2028) in February 2012 and the Camberley Town Centre Area Action Plan in July 2014. The Council proposes to produce a new Local Plan to cover the period to 2032. The Council will be consulting on an Issues and Options version of the New Local Plan in late spring 2018.
- 2.5. Hart is publishing a ‘Regulation 19’ Local Plan Strategy and Sites 2016-2032 (Proposed Submission Version) on 9 February 2018. Hart has a number of saved local plan policies in use from the Hart District Local Plan (Replacement) 1996-2006, and First Alteration to that Plan.
- 2.6. Rushmoor is a relatively small, highly urbanised and densely populated Borough, with a comparatively well defined built-up area made up of two major settlements, Aldershot and Farnborough, whose boundaries adjoin one another.
- 2.7. Hart is a predominately rural district within North Hampshire (west of Rushmoor), the two largest towns being Fleet and Yateley.
- 2.8. Surrey Heath lies in the north west corner of Surrey. The western half of the Borough is mostly urban in nature and comprises Camberley and Frimley and the villages of Frimley Green, Mytchett and Deepcut. The eastern half of the Borough is predominantly Green Belt.

- 2.9. There are a number of examples of collaboration between the three authorities and this provides an indication of the amount of joint working that has taken place.
- Establishment of the Joint Member Liaison Group and regular officer meetings held to discuss duty to cooperate matters.
 - Agreement on extent of Housing Market Area and publication of a Joint Strategic Housing Market Assessment
 - Agreement on extent of Functional Economic Area and publication of a Joint Employment Land Review
 - Agreement on standard methodology for Strategic Housing and Employment Land Availability Assessment/Strategic Housing Land Availability Assessments
 - Delivery of, and agreement to share, Suitable Alternative Natural Greenspace (SANG)
 - Production of a Joint Water Cycle Study
 - Production of a Joint Retail and Leisure Study (Part 1 Development Needs) with Hart District Council
- 2.10. Further detail is provided in the Duty to Cooperate Statement 2018.

Duty to Cooperate

- 2.11. The National Planning Policy Framework (NPPF) requires local authorities to work together on strategic planning issues. National Planning Practice Guidance (NPPG) clarifies the need for local authorities in the same functional housing and economic market areas to work together to identify development needs, because such needs "are rarely constrained precisely by local authority administrative boundaries".
- 2.12. Work under the "Duty" has continued to evolve through constructive and active work with both authorities in connection with the preparation of the Plan, and has focused on achieving outcomes that are deliverable, in order to address effectively planning issues that cross local authority boundaries. This is set out in detail in the Duty to Co-operate Statement 2018.

Housing Market Area

- 2.13. In 2013, the Council commissioned consultants to identify the HMA within which Rushmoor sits (in line with para 47 of the NPPF). This study provided a recommendation and justification¹¹ for the three authorities of Hart, Rushmoor and Surrey Heath to continue to work together as a housing market area. Subsequent analysis was also undertaken for Hart and Surrey Heath, which supported this view, and the three authorities therefore agreed to continue to work collectively as a housing market area. The HMA partners have jointly commissioned three Strategic Housing Market Assessments (SHMA). The first report was published in 2008, the second in 2014 and the most recent update dated November 2016 was published in January 2017.

¹¹ The evidence for this is incorporated into Section 2 and Appendix A of the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment, 2016 (SHMA).

- 2.14. In the first instance, national planning policy requires unmet housing needs to be addressed by adjoining local planning authorities forming part of a housing market area. Only once these opportunities have been exhausted through the plan making process would the search area extend in terms of a wider request to establish opportunities to meet any unmet housing needs. For the purpose of this Local Plan, work on establishing and meeting housing needs has therefore focused on joint working with Hart and Surrey Heath Councils. More detail on the process taken to achieve this, and the outcomes arising from it, are documented in more detail in the Duty to Cooperate Statement 2018. The strategy in the Local Plan reflects the outcome of this work under the Duty to Cooperate.

Functional Economic Area

- 2.15. Rushmoor Borough Council consulted neighbouring authorities and key economic stakeholders on a Functional Economic Area Analysis that examined the different ways in which the functional economic area, of which Rushmoor is part, could be defined. The final report was published in October 2014 and presents conclusions and recommendations to be taken forward in planning for economic development. One of the recommendations of the FEA Analysis is that the authorities of Hart, Rushmoor and Surrey Heath should update the joint Employment Land Review (ELR) to reflect changes to planning policy and guidance, and the substantial changes that have occurred within the commercial property market.
- 2.16. The authorities of Hart, Rushmoor and Surrey Heath have all published Functional Economic Area reports that identify strong linkages between the three local authority areas. Officers, in consultation with Members, therefore decided to update the Employment Land Review (which was previously undertaken jointly in 2009).

Hart, Rushmoor and Surrey Heath Joint Member Liaison Group

- 2.17. In May 2014, a joint Member Liaison Group was established and terms of reference agreed by the three authorities. The group's initial purpose was to provide a joint forum under the duty to co-operate for exploring how the objectively assessed need for housing in the Hart, Rushmoor and Surrey Heath Housing Market Area (HMA) could be delivered. The objectives of the group are:
- To reach an informal agreement between the three authorities on what the objectively assessed housing need is across the HMA, and within each authority area, over relevant time periods;
 - To informally agree whether each authority is doing all it can, consistent with policies in the NPPF and other material considerations, to meet the objectively assessed housing needs for its area;
 - That in the event of any shortfalls arising in one authority area, to explore how cross boundary working can help address those shortfalls.
- 2.18. In January 2015, the terms of reference of the group were extended to include future employment needs across the Functional Economic Area (FEA). The agreed Terms of Reference are available as an appendix to this statement (Appendix A).

3. Determining Housing Need

- 3.1. The SHMA (2016) identifies an objectively assessed housing need of 1,200 homes per annum across the HMA between 2014 and 2032. Of these, 436 homes per annum are identified as being required within Rushmoor, which equates to a total need of 7,850 dwellings to be provided in the Borough over the Plan period (2014 to 2032).

Table 1: Objectively Assessed Housing Need in the Hart, Rushmoor and Surrey Heath HMA

Local Authority Area	Dwellings per annum
Hart	382
Rushmoor	436
Surrey Heath	382
Total (HMA)	1,200

- 3.2. The three authorities have held regular joint officer meetings and joint member liaison group meetings to deliver an up to date SHMA for the HMA. In November 2016, the Joint Member Liaison Group approved the findings of the SHMA and agreed to its publication.

Consultation on Planning for the Right Homes in the Right Places

- 3.3. In September 2017, the Government published a consultation on Planning for the right homes in the right places. This consultation paper arises from matters raised in the Housing White Paper, published earlier in 2017. Proposals set out in the planning for the right homes consultation include a standard methodology for calculating local authorities' housing need.
- 3.4. The consultation paper is accompanied by a summary of housing need for each local authority, based on the proposed methodology. The data for the three authorities is published below, with a comparison against the objectively assessed housing need established through the most recent Strategic Housing Market Assessment.

Table 2: Comparison between the proposed standard methodology and the SHMA OAHN for the HMA

Local Authority Area	New Methodology ¹² (dwellings per annum)	OAHN ¹³ – SHMA 2017 (dwellings per annum)	Net Difference (-/+)
Hart	292	382	-90
Rushmoor	294	436	-142
Surrey Heath	352	382	-30

¹² Which is based from the year 2016

¹³ Based on the period 2014 to 2032

- 3.5. Transitional arrangements are proposed in the consultation paper for implementing the new methodology. These are set out in the table below.

Table 3: Proposed transitional arrangements (Planning for the right homes in the right places: consultation proposals, 2017)

Plan stage	Proposed transitional arrangements
No plan, or plan adopted more than five years ago and has not yet reached publication stage	The new standardised method should be used, unless the plan will be submitted for examination on or before 31 March 2018, or before the revised Framework is published (whichever is later).
Plan has been published, but not yet submitted	If the plan will be submitted for examination on or before 31 March 2018 or before the revised Framework is published (whichever is later), continue with the current plan preparation – otherwise, use the new standardised method.
Plan is at examination stage	Progress with the examination using the current approach.
Plan adopted in the last five years	Use the new standardised method when next reviewing or updating the plan.

- 3.6. In November 2017, the three authorities commissioned a review of the SHMA 2016, focussed on seeking to establish whether the OAN set out in the HRSH SHMA 2016 is still appropriate, in light of the Planning for the Right Homes consultation, representations on Hart and Rushmoor Plans, new data available and recent decisions at Local Plan Examinations. This review concluded that the OAN for the HRSH HMA remains valid and robust, given the requirements for SHMA preparation set out in Planning Practice Guidance, which currently inform how OAN should be determined.
- 3.7. Following careful consideration, and in line with the proposed transitional arrangements set out in Planning for the Right Homes, Rushmoor has chosen to continue with submission of the current Local Plan, which is based on meeting objectively assessed need identified in the SHMA. More information on this decision is set out in a Cabinet Report (dated 17th October 2017)¹⁴.
- 3.8. When the consultation paper came out Hart had not yet reached the Publication Stage. Accordingly, in line with the transition arrangements, Hart’s Regulation 19 Proposed Submission Version (to be published on 9 February 2018) is based on the proposed standard methodology.
- 3.9. Surrey Heath is proceeding towards a Local Plan Issues and Options consultation in late Spring 2018. It is therefore expected that Surrey Heath will also prepare its Plan based on

¹⁴ <https://democracy.rushmoor.gov.uk/documents/s3048/Item%206%20-%20Planning%20for%20the%20right%20homes%20in%20the%20right%20places%20consultation%20-%20Report%20No.%20PLN1733.pdf>

the proposed standard methodology or any amended methodology subsequently adopted by Government.

4. Meeting Housing Need across the HMA

4.1. The NPPF requires that local planning authorities meet their full, 'objectively assessed' needs for both market and affordable housing in their housing market area, as far as is consistent with other policies in the NPPF.

4.2. The Terms of Reference of the Joint Member Liaison Group (Appendix A) was established to meet the following outcome:

“Where all three authorities are satisfied that each one is doing all it reasonably can to meet its own housing needs, and that any shortfalls in one area are addressed as far as possible through joint working, so that across the HMA as a whole needs are met as far as possible, consistent with policies in the NPPF. In the event that the objectively assessed housing need within the HMA is judged as being impossible to meet, the Group will establish how to approach adjacent HMAs.”

4.3. The current objectively assessed housing need is set out in the SHMA 2016. However, proposals set out in the Planning for the Right Homes consultation include a standard methodology for calculating local authorities' housing need and, therefore, the way housing need is calculated and resulting housing requirements are subject to change as the Hart and Surrey Heath Local Plans are progressed, and the Government's methodology is confirmed.

4.4. The Rushmoor Local Plan identifies a potential capacity in the Borough of about 9,000 new dwellings between 2014 and 2032. This is sufficient to meet the objectively assessed need for 7,848 dwellings identified in the SHMA. The Housing Delivery Topic Paper sets out in more detail the justification for the Rushmoor Local Plan Spatial Strategy, including how the Council has considered and exhausted the potential supply of land for new residential development outside the Defined Urban Area.

4.5. It is agreed that, by maximising housing delivery in Rushmoor, the Council is meeting, with a degree of flexibility, its share of the HMA's SHMA based OAHN within the Borough. Hart and Surrey Heath are content that Rushmoor has made all reasonable endeavours within the parameters set by 'sustainable development' to maximise its contribution to meeting the needs of the wider HMA within which it sits.

4.6. Surrey Heath has indicated that, despite best endeavours, there is the *potential* for unmet housing need due to the extent of constraints within the Borough¹⁵. Surrey Heath's Local Plan is at an early stage, with a Regulation 18 Issues and Options consultation scheduled for spring 2018¹⁶; Surrey Heath Council will continue to identify and assess every possible opportunity within the Borough to reduce further the level of shortfall throughout the Plan preparation process.

¹⁵ Namely, the extent that the Borough is designated as Green Belt and Thames Basin Heaths Special Protection Area and the amount of operational MOD land.

¹⁶ To date, emerging work undertaken by Surrey Heath to support the development of the Regulation 18 Surrey Heath Local Plan identifies a potential shortfall of around 1,500 units against the OAHN set out within the SHMA 2016 or around 950 units against the consultation version of the Government's proposed methodology for assessing housing need.

- 4.7. In the event that Surrey Heath has demonstrated that it is unable to eliminate the remaining shortfall, and the Housing Market Area partners are satisfied that Surrey Heath has taken all reasonable steps to meet its own share of the housing need, the three authorities will work together to ensure that the shortfall is addressed elsewhere within the HMA. Based on current information all three authorities are confident that this will be achieved (see paragraph 4.10 below).
- 4.8. Hart will publish a Proposed Submission Version (Regulation 19) of its Local Plan on 9th February 2018. The Plan, agreed by Council on 4th January 2018, is based on the consultation version of the new standard methodology for determining local housing needs.
- 4.9. Hart's indicative figure in the Government consultation is 292 dwellings per annum, which equates to 4,672 homes between 2016 and 2032. However, Hart has uplifted its housing target to 388 dwellings per annum to provide some contingency for the Government figures increasing, to enhance delivery of affordable housing, and to reflect the availability of previously developed land and committed sites. Hart's Plan shows an anticipated supply of 6,346 between 2016 and 2032, and in addition, includes a commitment to plan for a new settlement through a separate Development Plan Document. This new settlement is expected to start delivering new homes from around mid-way through Hart's Local Plan period.
- 4.10. It is important to note that the housing need figures for all three authorities have decreased under the proposed standard methodology (see Table 2 above). The HMA as a whole is on track to exceed the indicative housing need figures as set out in the Government's consultation, with a substantial contingency to allow for the fact that the Government figures could increase when the methodology is finalised. On this basis, if, despite best endeavours, there is a shortfall of housing in Surrey Heath, there is still expected to be a significant surplus of planned supply to across the HMA as a whole.
- 4.11. In conclusion, Hart and Surrey Heath are preparing their local plans mindful of the need to meet their own share of the HMA's housing needs as far as is reasonably possible, and to aim to meet HMA housing needs within the HMA, both of which are obligated by the Terms of Reference of the Joint Member Liaison Group. It is important to consider this in the context of the Government's consultation proposals to change how local housing need is determined.

5. Employment Land and Premises

- 5.1. The Council jointly commissioned an Employment Land Review (ELR) with Hart District Council and Surrey Heath Borough Council to provide a detailed assessment of the supply of employment floorspace and land within the Hart, Rushmoor and Surrey Heath FEA and the likely future demands. The first report was published in 2009, the second in 2015 and the most recent update in November 2016. The three authorities have held regular joint officer meetings and Joint Member Liaison Group meetings to deliver an up to date ELR for the FEA. In November 2016, the Joint Member Liaison Group approved the findings of the ELR and agreed to its publication.
- 5.2. The ELR (2016) identifies a forecast floorspace requirement for the FEA for between 210,640 and 229,029 square metres of B-class floorspace. This translates into a land requirement of

between 47 and 49.2 hectares. This level of requirement can be met from the existing supply of land allocations and extant permissions, but without there being a significant surplus of employment land.

6. Suitable Alternative Natural Greenspace (SANG)

- 6.1. The whole of Rushmoor Borough lies within five kilometres of the Thames Basin Heaths Special Protection Area (SPA), and all net new dwellings therefore require mitigation in the form of Suitable Alternative Natural Greenspace (SANG). Whilst this has not been used to constrain the housing target, the urban nature of Rushmoor means that work will need to continue over the lifetime of the Plan to ensure ongoing provision of sufficient SANG sites in order to mitigate potential recreational impact on the Thames Basin Heaths SPA of net new residential development.
- 6.2. A number of SANG sites have been delivered to mitigate the impact on the SPA. This has included three areas of SANG: Hawley Meadows, Rowhill Nature Reserve and Southwood Woodlands. In addition, a bespoke SANG, known as the Wellesley Woodlands, has been delivered to mitigate the impact of the Wellesley development. Hawley Meadows is a shared SANG, which provides mitigation for development in the Surrey Heath, Rushmoor and Hart authority areas. A Memorandum of Understanding (MoU) relating to this was signed in 2010.
- 6.3. In addition, in November 2017, Hart District Council and Rushmoor Borough Council signed a Memorandum of Agreement (MOA). This MOA sets out the principles which shall govern the support that Hart will give Rushmoor through access to Suitable Alternative Natural Greenspace (SANG) capacity in Hart District as habitat mitigation for 3,600 people (around 1,500 new homes) arising from anticipated developments within Rushmoor Borough. This has established an arrangement to enable developers pursuing schemes in parts of the borough to contribute to new SANG projects within the district of Hart.
- 6.4. The Council continues to explore options to deliver additional SANG to support the delivery of new homes.

7. Joint Plan

- 7.1. It has not been considered appropriate to prepare a joint plan for the three authorities. It is acknowledged that this could have been one mechanism to enable constructive, active and ongoing engagement on housing and other strategic matters. However, given that the authorities sit across different County boundaries, this would have potentially added a layer of complexity that could have been counterproductive in terms of decision making and the appropriate mechanisms to deliver expediently an up to date development plan.
- 7.2. On this basis, the three Councils have come to a mutual decision to prepare individual Local Plans for each area. However, extensive collaboration has taken place between the three authorities at Officer and Member level, and the Rushmoor Plan is an expression of this cross boundary working. It therefore represents an appropriate strategy to deal with the particular characteristics of the Borough, and for delivery of growth in the wider context.
- 7.3. An alternative option could have been to align the Local Plans, so they were examined and adopted at broadly the same time. However, the three Local Plans are at different stages

and have been progressing at different rates. This would have resulted in a significant delay to delivering the Rushmoor Plan.

- 7.4. In conclusion, Rushmoor Borough Council considered that preparing a Local Plan for Rushmoor, was the most effective and expedient way to ensure that an up to date Local Plan could be put in place to deal with some of the key challenges for the Borough (such as the need for regeneration of Aldershot and Farnborough Town Centres).

8. Monitoring and Ongoing Co-operation

- 8.1 Joint working between the three authorities will continue under the Terms of Reference of the Hart, Rushmoor and Surrey Heath Housing and Employment Joint Member Liaison Group (Appendix A). This states that where all three authorities are satisfied that each one is doing all it reasonably can to meet its own housing needs, any shortfalls in one area are addressed as far as possible through joint working, so that within the HMA as a whole needs are met as far as possible, consistent with policies in the NPPF. In the event that the objectively assessed housing need within the HMA is judged as being impossible to meet, the Group will then establish how to approach adjacent HMAs. However, it is anticipated that housing need should be able to be accommodated within the HMA, and that this scenario is unlikely to materialise in the context of current plan making.
- 8.2 The Council's Authority Monitoring Report (AMR) will be used to report on the effectiveness of the policies to deliver against the objectives of the Local Plan. This includes Objective A - To address local housing needs by planning for at least 7,850 new homes of an appropriate housing mix and tenure, including specialist housing needs, between 2014 and 2032.
- 8.3 The Council is also committed to ensure that there is proportionate and robust evidence available to support the emerging Rushmoor Local Plan and to support planning across the HMA and FEA. Where appropriate, the Council will work with both authorities to prepare further joint evidence or update existing joint evidence.

9. Conclusions

- 9.1 In summary, Rushmoor Borough Council considers that the information provided in this statement and the evidence provided in the Duty to Cooperate Statement, demonstrates clearly that the Council has met both the legal and soundness requirements of the Duty to Cooperate, as follows:

Constructive

The Council has worked constructively with both HMA authorities from the outset and much of the co-operation is built on longstanding existing working relationships and arrangements in place prior to the development of the Rushmoor Local Plan. The Council has sought to approach co-operation in a meaningful and positive way, focusing on actions and achieving outcomes as part of working groups and focused meetings.

Active

The Council has been active throughout the process in order to tackle strategic matters with both authorities. This has included the establishment of forums to enable decisions and agreements to be made at both the officer and Member level.

Ongoing

Co-operation has been ongoing and founded, in many cases, on longstanding partnerships built prior to preparation of the Rushmoor Local Plan. Work under the Duty has continued to evolve through constructive and active work with neighbouring authorities and key partners in connection with the preparation of the Plan.

Collaborative

Section 33A(6) of the 2004 Act requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

Hart, Rushmoor and Surrey Heath Housing and Employment

Joint Member Liaison Group

TERMS OF REFERENCE 2014 (updated January 2015)

Background

1. The National Planning Policy Framework requires local authorities to ensure that their Local Plans meet the full objectively assessed needs for housing (in the housing market area), and employment (in the functional economic area), as far as is consistent with policies in the Framework.
2. In order to identify the objectively assessed housing needs across the housing market area, Hart, Rushmoor and Surrey Heath Councils commissioned Wessex Economics to carry out a Strategic Housing Market Area Assessment for the three authorities. A draft was published in May 2014, with the final report completed in December 2014.
3. In order to identify economic development needs, the three Councils have jointly prepared an Employment Land Review. A draft is to be published in February 2015 with the final report to be completed April 2015.

Purpose of the Joint Member Liaison Group

4. To provide a joint forum under the duty to co-operate for:
 - exploring how the objectively assessed need for housing in the Hart/Rushmoor/Surrey Heath Housing Market Area (HMA) could be delivered;
 - exploring how the objectively assessed need for employment in the Hart/Rushmoor/Surrey Heath Functional Economic Area (FEA) could be delivered; and
 - recognising the need to balance housing and employment provision across the three authorities.

The nature of the group

5. The liaison group is not a decision-making body. Any agreement by the Group will be subject to the democratic and local plan processes within each local authority.

Specific objectives

- i. To reach an informal agreement between the three authorities on what the objectively assessed housing need is across the HMA, and within each authority area, over relevant time periods¹⁷;
- ii. To informally agree whether each authority is doing all it reasonably can, consistent with policies in the NPPF and other material considerations, to meet the objectively assessed housing needs for its area;
- iii. That in the event of any housing shortfalls arising in one authority area, to explore how cross boundary working can help address those shortfalls;
- iv. To reach an informal agreement between the three authorities on what the likely employment need (jobs target/floorspace requirement) is across the FEA up until 2032 and how this target is apportioned to each local authority area; based on evidence including land availability (supply) and information on the commercial property market (demand). It is anticipated that the targets will be ranges to provide flexibility.

Outcomes

6. Where all three authorities are satisfied that each one is doing all it reasonably can to meet its own housing needs, and that any shortfalls in one area are addressed as far as possible through joint working, so that across the HMA as a whole needs are met as far as possible, consistent with policies in the NPPF. In the event that the objectively assessed housing need within the HMA is adjudged as being impossible to meet, the Group will establish how to approach adjacent HMAs.
7. Where all three authorities are satisfied that each one is doing all it reasonably can to meet its own employment needs, so that across the FEA as a whole needs are met as far as possible, consistent with policies in the NPPF.

Membership

8. The Joint Member Liaison Group will:
 - Comprise two elected Members from each authority. Substitutes may attend if appropriate.
 - Meet at intervals to be agreed at the first meeting.

¹⁷ Different authorities in the HMA are currently working to different local plan periods, so it may be necessary to agree figures for housing need that cover different time periods.