



Gladman Developments Ltd

Examination of the Hart Local Plan 2016 - 2032

Matter 1 – Legal Requirements

1.1 Overall, has the Plan been prepared in accordance with the Duty to Co-Operate imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)?

Sang

As a significant issue affecting the authorities across the HMA, Gladman query whether the issue of SANG provision has been adequately dealt through the duty to cooperate.

Given the inherent protections that exist toward European protected sites, SANG provision is a significant strategic issue for authorities falling within the zone of influence of the Thames Basin Heath and therefore is sufficient capacity available is best dealt with both within and across local authority boundaries. When seeking to deliver a sound spatial strategy, the Council will of course have to factor in SANG to ensure planned development results in no likely significant effects on protected sites. Historically, it is noted that Hart have been willing to offer Rushmoor and Surrey Heath access to SANG in the north and east of the district, as well as Basingstoke and Deane access to SANG in the south of the district. However, it is unfortunate that according to the latest update on SANG Capacity Assessment¹, while there is spare capacity in Hart District, much of that is in private hands. There is also no capacity in capacity in the north of Hart including at Clarks Farm/ Swan Lakes sang in Yateley and Hawley Meadows. Hart operate and apply stringent policies that limit access to SANG, which has led to knock on consequences limiting housing density in the district and now, limiting the ability for new housing to come forward, particularly in the north. Ensuring the all authorities within the HMA provide sufficient SANG to meet need is therefore of paramount importance.

Given the stated importance of there being sufficient SANG across the entire HMA, we question whether a sufficiently proactive approach has indeed been taken in trying to identify further capacity (particularly in the north) to ensure that the development needs of these settlements can be met whilst providing a sound spatial strategy. Indeed, it is noted that according to the recent SANG capacity Assessment carried out by Hart, there are either no clear timeframes for when SANG will become available. In some instances, even once SANG comes online, any spare capacity will immediately be used up to meet the development needs of the site the SANG is associated with.

Unmet housing needs

Gladman are supportive of the Council's positive approach in assisting Surrey Heath in delivering anticipated unmet housing needs however this need is yet to be quantified and ratified through examination of the Surrey

¹ Annual Assessment of Availability of suitable alternative natural green space (sang) 18th September 2018, Overview and Scrutiny Report

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Heath Local Plan. As a result, we would like to see more certainty detailed in the Hart Local Plan that these needs will be met once adopted, even if this would require a review of the Hart Local Plan.

We recognise in this circumstance that there is the suggestion the level of unmet need of Surrey Heath is likely to go down due to the influence of the new standard methodology, but it must be noted that this methodology is not yet finalised.

New Planning Practice Guidance published on the 13th September 2018 on Local Housing Needs states that authorities should still consider recent assessments of need, such as Strategic Housing Market Assessments. Where these assessments have suggested there is a higher levels of need than those proposed by a strategic policy-making authority, it would be necessary to justify an assessment of lower need. This creates yet more uncertainty as to whether Surrey Heath can justify a housing requirement less than a recent assessment of need and therefore uncertainty as to what the quantum of unmet need of Surrey Heath will equate to. Hart should therefore commit to a potential review of the Local Plan once the unmet needs of Surrey Heath are quantified.

1.3 Is the Sustainability Appraisal (SA) adequate? Has the Plan's formulation been based on a sound process of SA and testing of reasonable alternatives?

Having considered the SA supporting the Plan's formulation Gladman have concerns about the Plan's formulation and robustness of the reasonable alternatives that were tested. Gladman note that in the draft iteration of the Local Plan at Box 6.3 it stated that any option that would deliver significantly below the 'policy on' housing target figure of 485 dwellings per annum was an unreasonable spatial strategy option and as such was discounted.

Therefore, Gladman query what steps and changes have occurred, for the approach of delivering significantly less than the 'policy on' housing target figure of 485 dwellings to per annum to become not only a reasonable option, but the final option the Council are progressing. We would expect this retesting of the options to have been significantly more detailed in deriving the overall quantum of housing rather than the approach of testing the number and distribution at the same time. In Gladman's view, these assessments should have been undertaken separately once the housing figure was derived, to which we submit should still be the 485 dwelling per annum figure that was the preferred approach set out in the draft plan.