



Pre-Submission Surrey Heath Local
Plan (2019-2038): (Regulation 19)

Statement of Common
Ground SCG02

with Rushmoor Borough Council



June 2024

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I. Introduction

- I.1. This Statement of Common Ground (SCG) has been prepared jointly between **Rushmoor Borough Council (RBC)** and **Surrey Heath Borough Council (SHBC)**. It sets out the agreed position as at June 2024 in relation to cross boundary strategic planning matters affecting the two authorities. It has been prepared to support the Pre-Submission Surrey Heath Local Plan (2019 – 2038) (Local Plan). The SCG demonstrates on-going cooperation between the two authorities in line with the requirements set out below.
- I.2. Under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011) and in accordance with paras. 24-27 of the National Planning Policy Framework (NPPF 2023), it is a requirement under the duty to cooperate for a local planning authority to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other documents. This is a test that local authorities need to satisfy prior to the local plan examination stage and is an additional requirement to the test of soundness.
- I.3. The duty to cooperate applies to strategic cross-boundary matters. The statutory requirements of the duty to cooperate are not a choice but a legal obligation, although it is not a duty to agree. Cooperation should produce effective and deliverable policies on strategic cross boundary matters in accordance with national planning policy, as further explained in National Planning Practice Guidance (NPPG). The Council has published a Duty to Cooperate Statement of Compliance to demonstrate how the legal duty has been met. This is published alongside the Local Plan on the Evidence Base webpage.
- I.4. This SCG has been prepared to support the Pre-Submission version (Reg19) of the Local Plan and is in line with paragraph 27 of the NPPF which encourages SCGs to be made publicly available throughout the plan-making process. The SCG may be updated following the Pre-submission Local Plan consultation if it is considered helpful to add other matters prior to Submission which will support the Local Plan Examination. A previous Statement of Common Ground was agreed between the two authorities in March 2022 and published alongside the Regulation 18 Surrey Heath Draft Local Plan consultation.
- I.5. Nothing in this SCG fetters any comments that Rushmoor Borough Council may make on the Pre-Submission Surrey Heath Local Plan publication due to run in August to September 2024.



2. Background

- 2.1. Although Rushmoor lies within Hampshire, the close geographical location and other links as set out elsewhere in this statement means that there is a history of joint working between the authorities.
- 2.2. Both authorities agree that the most relevant cross-boundary strategic planning matters affecting the Surrey Heath Local Plan are as follows and that there has been ongoing constructive and active engagement in the plan making process:
 - Meeting housing needs;
 - Meeting Gypsy and Traveller and Travelling Showpeople needs;
 - Protection of the Thames Basin Heaths Special Protection Area.
- 2.3. Whilst there are other strategic cross boundary matters, both authorities agree that at the time of this Statement that there are no strategic issues to be resolved on those matters which would affect the delivery of the Surrey Heath Local Plan – as set out in Section 6 of this SCG.
- 2.4. An agreed Statement of Common Ground was prepared by the two authorities to support the Draft Surrey Heath Local Plan: Preferred Options (Regulation 18) in 2022. The outcomes of duty to cooperate discussions as set out in the March 2022 SCG were:
 - Agreement to the general process and outcomes taken by SHBC to identify future housing capacity;
 - Confirmation by RBC that due to its specific circumstances and the need for flexibility in supply, it is unable to meet any unmet housing needs arising in Surrey Heath;
 - Recognition that across the HMA there is a commitment in the Hart Local Plan to delivery 41 dpa of unmet needs in Surrey Heath (over the period 2019 – 2032);
 - Agreement to on-going discussion following consultation on the Draft Surrey Heath Local Plan: preferred Options and in light of any national changes to the standard method for calculating the housing requirement.
- 2.5. Rushmoor Borough Council made representations on the Draft Local Plan as set out in summary below.

Draft Surrey Heath Local Plan



RBC response – Has no comments to make given that there is a recently agreed Statement of Common Ground relating to housing provision in the two boroughs. Also confirm that they do not have any sites to offer for gypsy and traveller accommodation and comment that they would expect to accommodate the needs of their travelling showpeople community within their own borough.

2.6. These comments are noted by SHBC.

2.7. Engagement with RBC to inform the Surrey Heath Local Plan 2019 – 2038 has included the following:

- December 2023 - Joint Officer meeting with Rushmoor and Hart;
- October 2023 - Letter sent to Rushmoor and other neighbouring authorities regarding unmet Gypsy and Traveller and Travelling Showpeople Needs (and RBC response dated 3 November 2023);
- September 2023 – Copy of the draft Strategic Highway Assessment Report sent to RBC for comment;
- September 2023 – RBC attended briefings held by SHBC on the Strategic Highway Assessment and on Gypsy and Traveller and Travelling Showpeople needs;
- August 2022 – Letter sent to RBC regarding unmet gypsy and traveller and travelling showpeople needs;
- July 2022 – Joint meeting with Hart District regarding capacity for Suitable Alternative Natural Greenspace (SANG);
- Spring and Summer 2022 – Regulation 18 consultation on the Draft Surrey Heath Local Plan (and RBC response dated 6 June 2022);
- March 2022 – Statement of Common Ground agreed to support the Reg18 Draft Surrey Heath Local Plan;
- October 2021 – Letter sent to RBC regarding unmet housing needs and gypsy and traveller and travelling showpeople needs (and RBC response 2 December 2021);
- July 2021 – Officer meeting regarding strategic planning matters;
- December 2020 – Letter sent to RBC regarding unmet housing needs;
- 2018 – Statements of Common Ground agreed between Hart, Rushmoor and Surrey Heath to support the Rushmoor and Hart Local Plans;
- Summer 2018 – Consultation on the Surrey Heath Local Plan Issues and options;

2.8. Further details of the above can be found in the Council’s Duty to Cooperate Statement of Compliance.



3. Rushmoor Local Plan 2014 – 2032

- 3.1. The Rushmoor Borough Local Plan was adopted in February 2019. The housing requirement of at least 7,850 new homes is based on the SHMA 2016 objectively assessed housing needs. At the time of submission and adoption of the Local Plan, evidence supporting the Plan demonstrated a potential capacity of about 8,900 homes.
- 3.2. Rushmoor presented evidence at their Local Plan Examination to demonstrate that this potential capacity was required to provide sufficient flexibility to ensure delivery of the Rushmoor Local Plan. The Rushmoor Local Plan Inspector concluded that the:
- “...Local Plan demonstrates how the identified capacity of 8,900 homes can be delivered across the plan period. The theoretical capacity provides a significant buffer to accommodate potentially slow delivery at a single large site, and for the longer term town centre regeneration sites. The theoretical capacity is therefore a robust approach in the context of Rushmoor’s specific characteristics’.*
- 3.3. Having regard to the date of adoption, Rushmoor Borough Council has undertaken a review of the Local Plan and concluded at it’s Cabinet meeting on 21st November 2023 that a full update of the Local Plan policies is needed. RBC consulted SHBC on this review in September 2023 and took account of the response received from SHBC. In March 2024, RBC published an updated Local Development Scheme in response to request from Government in a Written Ministerial Statement published in December 2023. This LDS confirms the intention to prepare a new Local Plan under the new plan-making system and includes an indicative timetable based on commencing work in Autumn 2024. This is subject to any potential transitional arrangements and there being no further delays to national policy, guidance and regulations.



4. Meeting Housing Needs

Background

- 4.1. At the time of preparing the Hart and Rushmoor Local Plans, Hart, Rushmoor and Surrey Heath were working together as a Housing Market Area. A Strategic Housing Market Assessment (SHMA) was prepared jointly in 2009 with a second published in December 2014. A further update was prepared in 2016 to inform plan making in the three authorities. A Joint Member Liaison Group was also established to discuss matters of housing need across the HMA as well as related matters regarding the Thames Basin Heaths Special Protection Area and employment needs.
- 4.2. The adopted Hart and Rushmoor local plans were examined against the 2012 National Planning Policy Framework (NPPF). For those plans, the objectively assessed housing needs (OAHN) identified in the 2014 SHMA was the start point for establishing a housing requirement.
- 4.3. The Surrey Heath Local Plan has been prepared under more recent NPPFs and so the housing requirement is informed by a local housing needs assessment using the standard method. The Council has engaged all neighbouring authorities in discussions on unmet needs.
- 4.4. In June – August 2018 SHBC consulted on a Draft Local Plan Issues and Options/Preferred Options (Reg 18) for the period 2016 – 2032. That consultation reflected the standard methodology approach and the (then) indicative need of 352 dwellings per annum.
- 4.5. Evidence prepared to support the 2018 Surrey Heath Local Plan consultation identified a shortfall of 731 homes over the plan period and that shortfall was reflected in the Local Plan consultation document. This shortfall was used as the basis for discussions with Hart and Rushmoor and was reflected in Statements of Common Ground in January and November 2018. This also formed the basis of representations to the Hart Local Plan. As a result, the adopted Hart Local Plan accommodates an unmet need in Surrey Heath of 731 homes between 2014 and 2032.



Progressing the Surrey Heath Local Plan 2019 - 2038

- 4.6. The housing requirement in the Surrey Heath Local Plan 2019 – 2038 is based on the standard methodology which as set out in the Strategic Housing Land Assessment, 2023 gives a requirement of 321 dwellings per annum. The Borough Council has carried out a robust approach to assessing the likely future housing capacity in the Borough including through a Countryside Capacity Study, and Strategic Land Availability Assessment (SLAA). Both of these were shared with RBC in October 2021.
- 4.7. Work undertaken by SHBC has identified a continued shortfall in capacity against the housing supply. Of note in considering unmet needs in Surrey Heath is that the Council has written to all other adjoining and Surrey local authorities (October 2021) formally asking whether they are able to help meet any unmet needs. All other authorities who responded, stated that they were not able to help meet unmet needs [excluding Hart as set out below].
- 4.8. At the time of writing to RBC in October 2021 SHBC identified a shortfall of 520 new homes against the standard methodology requirement over the Plan period. In line with the NPPF and alongside the written request to Hart and Rushmoor regarding unmet needs, the Council also revisited the assumptions on a few sites in the SLAA. This has resulted in some additional housing capacity being identified over the plan period, predominantly from increases in capacity at sites in Camberley Town Centre.
- 4.9. The standard method identifies a housing requirement for Surrey Heath Borough of 6,111 new homes. As at March 2024, and supported by an updated SLAA, the Council has identified a housing supply of 6,012 homes, a shortfall of just over 100 homes without any allowance for a buffer. There therefore remains a shortfall in Surrey Heath against the standard method for local housing need. Hart District Council has confirmed in writing its commitment set out in the adopted Hart Local Plan 2020 to deliver 41 dpa over the overlapping Plan periods – i.e. 2019 – 2032. This provides a supply of 533 dwellings towards meeting unmet needs in Surrey Heath.
- 4.10. In duty to cooperate discussions and formal written response in December 2021, RBC has reiterated the need for flexibility in its own housing supply. Since the Rushmoor Local Plan was adopted in 2019, the ‘significant buffer’ has been reduced as housing delivery has been slower than anticipated and as at April 2021 the evidence shows only a small surplus of dwellings over the Local Plan requirement. RBC considers that the slippage in housing delivery in Rushmoor underlines the importance of maintaining a surplus to ensure the Local Plan housing requirement is met.



- 4.11. Rushmoor Borough Council has confirmed that it is therefore unable to meet any unmet needs arising in Surrey Heath.

Housing Needs Outcomes

- 4.12. The following outcomes have been agreed by the two authorities:
- Agreement to the general process and outcomes taken by SHBC to identify future housing capacity;
 - Confirmation by RBC that due to its specific circumstances and the need for flexibility in supply, it is unable to meet any unmet housing needs arising in Surrey Heath;
 - Recognition that there is a commitment in the Hart Local Plan to deliver 41 dpa of unmet needs in Surrey Heath (over the period 2019 – 2032);

Gypsy and Traveller and Travelling Showpeople Needs

- 4.13. Surrey Heath Borough has a significant need for Gypsy and Traveller and Travelling Showpeople sites over the Plan period. However, the environmental constraints that affect the Borough means that it is challenging to find available and sustainable sites to meet these needs. Capacity work has demonstrated a shortfall of Gypsy and Traveller sites. As such, a number of Policies have been updated in the Regulation 19 Local Plan to provide a more flexible and permissive approach that encourages unallocated Gypsy and Traveller and Travelling Showpeople sites to come forward to help address the Council's needs. This has included setting out in Policy H9 that Rural Exception Sites may be brought forward for Gypsies and Travellers and that pitches and plots will be considered acceptable in principle within the countryside beyond the Green Belt. A criteria based policy at H11 has also been updated, whilst retaining a requirement for traveller provision within housing sites of 100 or more homes.
- 4.14. The Council wrote to Rushmoor Borough Council (and other local authorities) setting out the challenges of meeting Gypsy and Traveller and Travelling Showpeople needs in October 2021 and August 2022. In response to the latter, and to the Draft Surrey Heath Local Plan Regulation 18 consultation, Rushmoor Borough Council responded that it had no specific comments on the Plan but set out that it would not have sites to accommodate any unmet gypsy and traveller accommodation needs and would expect to meet the needs of Rushmoor's travelling showpeople community from sites within Rushmoor borough.



- 4.15. Both authorities recognise the challenges of meeting Gypsy and Traveller and Travelling Showpeople needs in the Borough and RBC recognises that Surrey Heath has explored all deliverable options up to this stage of plan making and has sought to engage neighbouring local authorities in the challenges raised. The more flexible approach to delivering Gypsy and Traveller sites within local plan policies is welcomed.
- 4.16. SHBC held a briefing for neighbouring authorities in September 2023 to set out the challenges of delivering Gypsy and Traveller sites in the Borough, to set out the proposed Policy framework and to seek any further suggestions from neighbouring local authorities. RBC attended the briefing. Following the briefing, SHBC wrote again to RBC in October 2023 setting out the portfolio of work it has undertaken to identify sites to meet the needs for Gypsies, Travellers and Travelling Showpeople and asking RBC whether it would be able to accommodate any potential unmet need and to confirm RBC's current Local Plan position regarding identified needs for Gypsies, Travellers and Travelling Showpeople. RBC responded setting out its identified needs are met in its current Local Plan and that Rushmoor is not able to meet any potential unmet need arising from Surrey Heath.

Meeting Gypsy and Traveller and Travelling Showpeople Needs Outcomes

- 4.17. The following outcomes have been agreed by the two authorities:
- Surrey Heath has undertaken robust and extensive work to try and identify sites to meet needs;
 - Whilst it is recognised that there are unmet needs, the flexible Policy approach explained in the Gypsy and Traveller and Travelling Showpeople briefing is welcomed;
 - RBC is not able to identify sites that would help to deliver any unmet needs from Surrey Heath.



5. Thames Basin Heaths Special Protection Area

- 5.1. Along with other affected local authorities, both authorities work jointly on the matter of the Thames Basin Heaths Special Protection Area (TBHSPA) through the Thames Basin Heaths Joint Strategic Partnership Board and related Officer and Member groups and as set out in the Surrey Heath Duty to Cooperate Statement of Compliance.
- 5.2. Along with Hart District, the two authorities also share a Suitable Alternative Natural Greenspace (SANG) at Hawley Meadows and gained Government funding to undertake joint work to investigate and seek to implement alternative and complementary avoidance and mitigation measures to those already agreed.
- 5.3. The nature of Surrey Heath Borough means that there are limited opportunities within the Borough to provide for SANGs in locations which will mitigate development in the western part of the Borough. It therefore relies on joint working with other local authorities to help deliver sufficient SANG capacity to enable housing delivery.
- 5.4. In addition to SANG capacity from sites owned by Surrey Heath Borough Council as well as capacity being delivered from SANG's in Hart District, no additional SANG capacity is being sought from Rushmoor Borough to deliver the Surrey Heath Local Plan.

TBHSPA Outcomes

- 5.5. The outcomes of joint work on the TBHSPA most directly relevant to delivering the Surrey Heath Local Plan are:
 - That both authorities will continue to work jointly on matters related to the Thames Basin Heaths SPA, including in relation to future SANG capacity; and
 - That no additional SANG capacity is currently being sought from Rushmoor to support the Surrey Heath Local Plan.



6. Other Strategic Cross Boundary Matters

- 6.1. The Surrey Heath Local Plan Duty to Cooperate Scoping Framework, 2020 identifies a number of other potential cross boundary strategic planning matters with Rushmoor Borough. These are as set out below. For the reasons identified, it is not considered by either authority that there are any outstanding issues on these matters that would impact upon the delivery of the Surrey Heath Local Plan.

Cross Boundary Matter	Comments
Economic and Retail Growth	<p>Whilst Hart, Rushmoor and Surrey Heath have previously undertaken joint work on economic needs, in preparing this new Local Plan Surrey Heath has undertaken work looking at the specific long term needs of the Borough having regard to the adoption of the Hart and Rushmoor Plans.</p> <p>Employment evidence supporting the local plan has indicated that B2/B8 needs can be met from existing commitments, use of vacant land and intensification of sites within the defined strategic and locally important employment areas. Whilst there is a potential shortfall in meeting office (E(g)(i)) needs those forecasts are considered to be less certain with a focus more on improvements to the quality of existing stock, through refurbishment rather than a requirement for additional land supply.</p> <p>Neither Hart or Rushmoor has raised any issues with the approach to meeting employment needs over the plan period and as such it is not considered that there is any outstanding matter arising from the Surrey Heath Local Plan that needs to be resolved.</p> <p>No additional retail floorspace is proposed through the Surrey Heath Local Plan and as such no strategic cross boundary impacts arise.</p>



Cross Boundary Matter	Comments
<p>Natural & Historic Environment and Green Belt</p>	<p>Rushmoor does not lie within the Green Belt and any associated cross boundary matters (i.e. unmet housing need) are dealt with under other cross boundary matters. There are no cross boundary heritage assets.</p> <p>In addition to Matters identified under the Thames Basin Heaths Special Protection Area dealt with earlier in this SCG, both authorities form part of the Blackwater Valley and engage with the Blackwater Valley Countryside Partnership that co-ordinates work to maintain the Valley as an open gap, enhance ecological value particularly of the wetland, floodplain meadow and wet woodland habitats and maintain and improve recreational access.</p> <p>It is not considered that proposals in the emerging Surrey Heath Local Plan will directly impact on any cross boundary natural environment matters. However, the Plan gives support to delivery of the Local Nature Recovery Strategy (when agreed) and the Council will support the Responsible Authority (Surrey County Council) in developing the Strategy, which will include consideration of cross-border challenges and opportunities for nature recovery, and responses to these, including a focus on priority habitats and species of the Blackwater Valley.</p>



Cross Boundary Matter	Comments
Flooding	<p>No cross boundary flooding issues have been identified by either authority or the Environment Agency arising from the proposed spatial strategy. Consideration has been given to flood risk zones affecting employment land supply in the Blackwater Valley area, where the majority of the Council's employment land use is located. This has provided assurance that the Local Plan's policy approach of intensification of land use within designated employment areas to meet future employment land needs would be compatible with the sequential and exception tests of the NPPF (2023) and the Planning Practice Guidance on 'Flood risk assessment and Coastal Change' (2022).</p>
Transport	<p>A briefing on the findings of the Strategic Highways Assessment Report (SHAR) was held by SHBC and a draft SHAR was shared with neighbouring local authorities. The SHAR considers the impacts of the proposed spatial strategy on the strategic highway network, cumulatively with proposed developments in neighbouring authorities. The SHAR concluded that the transport impacts of the spatial strategy tend to be local to the developments and that the cumulative impact is in general tolerable. Rushmoor is in agreement that the Surrey Heath Spatial Strategy does not result in any severe highway cross boundary impacts. Whilst there may be ongoing cross boundary working on issues such as cycle routes arising out of the Local Cycling and Walking Infrastructure Plan (LCWIP) process in each authority, there are no outstanding strategic cross boundary matters.</p>



Cross Boundary Matter	Comments
Social Infrastructure (Healthcare and Education)	<p>Education - neither RBC nor Hampshire (HCC) or Surrey (SCC) County Councils as local education authorities have raised any cross boundary matters. SCC has indicated that there is likely to be a surplus of mainstream primary and secondary school places in Surrey Heath by the end of the Plan period.</p> <p>Health – parts of Rushmoor Borough and Surrey Heath Borough lie within the NHS Frimley ICB and residents from both authorities are served by Frimley Park hospital. Frimley Health NHS Foundation Trust has identified additional pressure on services from new development arising in Surrey Heath. However, the hospital has been identified as a priority for rebuilding in the Government’s New Hospitals programme. As this project progresses there may be cross boundary issues that arise but at present there are no identified strategic cross boundary matters identified that affect delivery of the Surrey Heath Local Plan.</p>
Utilities	Engagement with infrastructure providers has not identified any strategic cross boundary matters in relation to utilities.
Climate Change	Adapting and mitigating to climate change covers a number of other strategic cross boundary matters covered above, including transport, green infrastructure and flooding. No strategic cross boundary matters have been identified that need to be resolved to support the Surrey Heath Local Plan.



Signatories

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Position	Executive Head of Property and Growth
Date Agreed	20/06/2024
Signature	

Surrey Heath Borough Council	
Name	Gavin Chinniah
Position	Head of Planning
Date Agreed	21/06/2024
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