



Submission Surrey Heath Local Plan
(2019 – 2038)

STATEMENT of COMMON
GROUND SCG01

Pre-Submission with Submission update
with Hart District Council



July 2024, updated October 2024

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1. Submission Statement of Common Ground Update

- 1.1. In August 2024, alongside the Pre-Submission Surrey Heath Local Plan, Surrey Heath Borough Council (SHBC) published a series of Statements of Common Ground (SCG) to support the Pre-Submission Local Plan, including a SCG with Hart District Council (HDC). It was noted that these would be updated following the Publication process and prior to Submission.
- 1.2. This Statement of Common Ground Update with HDC sets out further duty to cooperate activities that have taken place between the two authorities since August 2024 and up to the point of Submission and outlines any agreed or outstanding matters relating to strategic cross boundary planning matters. Section 2 onwards of this SCG is as agreed in the SCG with HDC in July 2024.

Duty to cooperate engagement

- 1.3. Engagement with Hart District Council since August 2024 has been:
- Response from Hart's Planning Portfolio holder on the matter of unmet gypsy, traveller and travelling showpeople needs.
 - Publication of the Pre-Submission Local Plan by SHBC.
 - Response from HDC to the Pre-Submission SHLP.
 - Virtual officer meeting on 8th October 2024.
 - Agreed Statement of Common Ground update ([this document](#)).
- 1.4. In July 2024 the Council's Homes, Planning & Enforcement Portfolio Holder wrote to the Planning Portfolio holders in all neighbouring local authorities regarding unmet gypsy, traveller and travelling showpeople needs. This set out the work that the Council has undertaken to date in seeking to meet gypsy and traveller and travelling showpeople needs over the plan period. It also set out that despite this work, the Council has been unable to identify sufficient sites to meet needs. This letter followed a number of previous approaches to neighbouring local authorities and again asked whether any local authority was able to assist Surrey Heath in meeting unmet needs.
- 1.5. In response to this letter, HDC responded to confirm that Hart is not in a position to accept any unmet needs for Gypsy and Traveller pitches or Travelling Showpeople plots. A summary of the responses received to this letter is set out as an Appendix to the Duty to Cooperate Compliance Statement Update produced to support Submission of the Local Plan.



Pre-Submission Representations

- 1.6. The table below sets out a Summary of the representations raised by Hart District Council to the Pre-Submission Local Plan and SHBC's response. These were discussed at the duty to cooperate meeting on 8th October 2024.



Table 1: HDC Pre-Submission Representations

Issue	HDC Comment	SHBC Response
General	Notes that there is a strong record of cooperation between the two authorities and support SHBC in progressing the Plan.	Noted
National Planning Policy Context	For the purposes of the representation, assume that the Local Plan will be examined under the NPPF, 2023. However, note that a new NPPF is likely to be published and that the Local Plan may be affected by the transitional arrangements. Would seek regular dialogue on Local Plan progress.	SHBC also considers that the Local Plan will be examined under the NPPF 2023. It is agreed that regular liaison will take place.
Housing numbers and duty to cooperate	HDC note the total housing need figure and the commitment in the adopted Hart Local Plan to deliver 41dpa to meet unmet needs in Surrey Heath from 2014 to 2032. This amounts to 533 homes in the overlapping Plan periods (2019 – 2032).	This matter was discussed at the duty to cooperate meeting on 8 th October 2024. SHBC has agreed to suggest a proposed modification to paragraph 2.7 to the Local Plan Inspector as set out by HDC.



Issue	HDC Comment	SHBC Response
	<p>HDC notes that due to the Hart Local Plan housing trajectory being front loaded in the first part of the plan period, figures showing the completion of new homes over the period April 2019 to 31 March 2032 demonstrate that Hart has already delivered the 533 homes identified in paragraph 2.7 of the Pre-Submission Surrey Heath Local Plan. Evidence to support this was submitted with HDC's representation on the Pre-Submission Local Plan.</p> <p>A modification is requested to paragraph 2.7 to provide clarity for the development industry and other stakeholders:</p>	



Issue	HDC Comment	SHBC Response
	<p>“2.7 It was in that earlier context that through the duty-to-cooperate and the Hart Local Plan Examination, Hart District Council agreed to accommodate 41 dwellings per annum of unmet need arising in Surrey Heath to 2032. This commitment is set out in Policy SSI ‘Spatial Strategy and Distribution of Growth’ in the adopted Hart Local Plan (Strategy and Sites) 2032. The Surrey Heath and Hart District Local Plans overlap for a period of 13 years, from 2019 – 2032, which at 41 dwellings per annum provides for a total of 533 homes to be delivered in Hart to meet Surrey Heath’s unmet housing need. Hart District has confirmed this commitment through duty-to-cooperate discussions <u>and, by virtue of surplus housing completions compared to its local plan housing requirement, has already met its commitment to deliver the 533 homes required between 2019 and 2032.</u>”</p>	
Travellers and Travelling Showpeople	HDC notes the identified need along with the allocation in Policy H12 for a single site for 5 traveller pitches and the requirements of Policy H11 which safeguards existing sites, supports planning applications for new sites subject to various criteria and expects provision on sites of 100 or more homes.	This matter was discussed at the duty to cooperate meeting on 8 th October 2024.




Issue	HDC Comment	SHBC Response
	<p>HDC welcomes the fact that Surrey Heath intends to meet its own needs.</p> <p>HDC would object if the SHLP left an unmet need for neighbouring authorities to address when preparing their local plans, especially in the context of a draft NPPF that looks for development needs to be met where they arise even if it means development within the Green Belt.</p> <p>For the benefit of adjoining authorities when preparing their local plans, it is necessary to clarify that there are no unmet Gypsy, Traveller or Travelling Showpeople needs for adjoining authorities to address. Furthermore, if the Local Plan Inspector finds that further work is necessary to address needs, this must be done by SHBC through a new local plan or other development plan document in the context of the next NPPF, and not fall to neighbouring authorities.</p>	<p>SHBC notes the response from HDC and would reiterate the extensive work that has been undertaken to seek to identify suitable sites to meet needs. This has included a number of letters to adjoining local authorities to ask whether any other authority is able to help meet unmet needs, and holding a briefing session for local authorities to set out the work undertaken and the inclusion of a more flexible policy approach to determine future applications.</p> <p>It is not proposed that any modifications to the Local Plan are suggested as a result of these comments.</p>

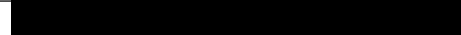


1.7. Officers held a virtual meeting on 8th October 2024. The outcomes of this meeting were:

- Updates on the timetables of both the Surrey Heath and Hart Local Plans.
- Agreement to a proposed modification to be submitted with the Local Plan regarding Hart’s delivery of unmet need.
- Clarification on HDC’s response on Gypsies, Travellers and Travelling Showpeople.
- Agreement that Hart will appear at the Local Plan examination (subject to the views of the Local Plan Inspector).
- Agreement in principle to an updated SCG.

Signatories for SCG Update October 2024

Hart District Council	
Name	Councillor Alan Oliver
Position	Planning Policy and Development Management Portfolio Holder
Date agreed	16 th October 2024
Signature	 PP Daniel Hawes, Planning Policy and Economic Development Manager on behalf of Councillor Alan Oliver, Portfolio Holder for Planning Policy and Development Management

Surrey Heath Borough Council	
Name	Councillor Alan Ashbery
Position	Portfolio Holder, Homes, Planning & Enforcement
Date agreed	1/11/2024
Signature	

The remainder of this Statement of Common Ground is as agreed at July 2024.



2. Introduction

- 2.1. This Statement of Common Ground (SCG) has been prepared jointly between **Surrey Heath Borough Council (SHBC)** and **Hart District Council (HDC)**. It sets out the agreed position as at July 2024 in relation to cross boundary strategic planning matters affecting the two authorities but particularly matters relating to housing, Gypsies and Travellers and Travelling Showpeople and the Thames Basin Heaths SPA and relevant mitigation. It has been prepared to support the Pre-Submission Surrey Heath Local Plan (2019 – 2038) (Local Plan) and has been agreed by both SHBC and Hart District Council and demonstrates ongoing cooperation between the two authorities in line with the requirements set out below.
- 2.2. 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.
- 2.3. The duty to cooperate applies to strategic cross boundary matters (those that might apply are set out in para. 20 of the NPPF). The statutory requirements of the duty to cooperate are 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.
- 2.4. 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 SCG 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 with the two parties in March 2022 and published alongside the Regulation 18 Draft Local Plan consultation.
- 2.5. Nothing in this SCG fetters any comments that HDC may make on the Pre-Submission Surrey Heath Local Plan consultation due to run from August to September 2024.



3. Background

- 3.1. Although Hart 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. In response to the Draft Local Plan consultation 2022, HDC noted:

“Hart is satisfied that thus far Surrey Heath has met the duty to cooperate and notes the signed Statement of Common Ground.”

- 3.2. Both authorities agree that the most significant 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.

- 3.3. Whilst there are other strategic cross boundary matters, both authorities agree that at the time of this Statement that there are no issues to be resolved on those matters or which would affect the delivery of the Surrey Heath Local Plan – as set out in Section 5 of this SCG.

- 3.4. 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:

- a) Confirmation by HDC of the continued commitment to the delivery of 41 dpa in Hart District to meet unmet needs in SHB over the overlapping plan periods (2019 – 2032) as set out in the adopted Hart Local Plan;
- b) Input into the SHB Strategic Land Availability Assessment (SLAA) by HDC to provide clarity and ease of understanding for D2C purposes; and
- c) 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 methodology for calculating the housing requirement.

- 3.5. Hart District Council made representations on the Draft Local Plan. These are set out in Appendix I along with SHBC’s response.



4. Meeting housing needs

Background

- 4.1. At the time of preparing the Hart and Rushmoor Local Plans, the three authorities were identified as comprising 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. In Hart's case, the local plan accommodates an unmet need in Surrey Heath of 731 homes between 2014 and 2032 (see paras 3.7 and 3.8 overleaf).
- 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. Previous SCGs in relation to the preparation of the Hart and Rushmoor Local Plans (January 2018 and November 2018) have recognised under the duty to cooperate, that Surrey Heath has a number of constraints including the Thames Basin Heaths Special Protection Area, SSSIs and Green Belt.

Surrey Heath Local Plan consultation 2018

- 4.5. 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 indicative need of 352 dwellings per annum.



- 4.6. Evidence prepared to support the 2018 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 2018 and November 2018. This also formed the basis of representations to the Hart Local Plan.

Hart Local Plan 2014 - 2032

- 4.7. Surrey Heath Borough Council made representations at the Hart Local Plan Examination regarding the level of unmet needs anticipated over the Plan period (731 dwellings). The Hart Local Plan Inspectors Report, February 2020 considered this matter and concluded (para 35):

“.. I consider that this Plan [Hart Local Plan] should seek to meet the identified unmet needs of SHBC of 731 dwellings, which represents the most up to date figure at this point in time”

- 4.8. The Hart Local Plan 2014 – 2032 was adopted in April 2020. Policy SSI sets out a housing requirement of 7,614 homes from 2014-2032 (423 per annum) which includes 731 homes of unmet need from Surrey Heath (41 homes per annum).
- 4.9. A formal review of the Hart Local Plan must take place no later than April 2025.

Surrey Heath unmet Housing needs 2019 - 2038

- 4.10. Both authorities agree that the starting point for deriving a housing requirement in the Surrey Heath Local Plan 2019 – 2038 is the standard methodology which as set out in the Strategic Housing Land Availability Assessment, 2023 (published March 2024) (SLAA) gives a local housing need of 321 dwellings per annum.
- 4.11. The Borough Council has assessed 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 HDC in October 2021. HDC made a number of comments on the Draft SLAA which were addressed by SHBC in the published 2021 version.



- 4.12. The work undertaken by SHBC for the Regulation 18 Draft Local Plan, 2022 identified an unmet housing need. The Council wrote 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. Responses are set out in an Appendix to the Duty to Cooperate Compliance Statement. This matter has also been discussed with other authorities in face-to-face meetings and has also formed part of the response by some local authorities to the Draft Local Plan Regulation 18 consultation. As at the time of this Statement no other authority has identified that it is able to help meet any unmet needs in Surrey Heath.
- 4.13. The outcome of the emerging Local Plan evidence and the matter of unmet housing needs to inform the Surrey Heath Local Plan 2019 – 2038 has been discussed by HDC and SHBC through the following:
- Virtual officer meeting on 15 June 2021 and agreed meeting note;
 - Written correspondence in October 2021 formally seeking a response from HDC on the matter of unmet housing needs;
 - Comments from HDC on the draft SLAA and supporting evidence, 2021;
 - Written response from HDC dated 21 December 2021;
 - Virtual meeting 14 January 2022 and agreed meeting note;
 - Response by HDC Portfolio Holder for Place to the Draft Local Plan Preferred Options consultation, March 2022;
 - Virtual officer meeting on 13th September 2022 and agreed meeting note;
 - Virtual officer meeting on 19 September 2023 and agreed meeting note;
 - Briefing by SHB and SCC on the findings of the Strategic Highways Assessment Report – 21st September 2023;
 - Briefing by SHB for neighbouring authorities on Gypsy and Traveller matters on 28th September;
 - Virtual officer meeting with Rushmoor and Hart – 12th December 2023 (not directly related to unmet need but included for completeness);
 - Virtual Portfolio holder meeting [19 July 2024] and agreed Statement of Common Ground.
- 4.14. At the time of writing to HDC 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 all other neighbouring authorities regarding unmet needs, the Council also revisited the assumptions on a few sites in the SLAA. This resulted in some additional housing capacity being identified over the plan period, predominantly from increases in capacity at sites in Camberley Town Centre.



- 4.15. Following duty to cooperate discussions and prior to the Draft Local Plan Regulation 18 consultation Hart District Council confirmed its commitment set out in the adopted Hart Local Plan 2022 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. This was also confirmed in a Statement of Common Ground agreed with HDC in March 2022 and in HDCs response to the Regulation 18 Draft Surrey Heath Local Plan.
- 4.16. The Reg 18 Draft Local Plan identified a Local Housing Needs figure of 6,213 new homes over the plan period. All sources of supply (excluding supply from Hart) identified a total supply of 6,082 homes indicating a small shortfall and no buffer to provide flexibility should the capacity of sites change or delivery be delayed.
- 4.17. The latest standard method calculation (as set out in the SLAA 2024, base date March 2023), identifies a local housing need of 6,111 homes. As at March 2024 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 remains a shortfall in Surrey Heath against the standard method for local housing need.

Meeting Housing Needs agreed outcomes:

- 4.18. The following outcomes on meeting housing need have been agreed by the two authorities:
 - In accordance with Policy SSI of the adopted Hart Local Plan 2032, 41 dpa of unmet need in Surrey Heath will be met within Hart District over the overlapping local plan periods of 2019 – 2032, a total of 533 homes;
 - HDC is on track to deliver/exceed its requirement, including the 41 dpa from Surrey Heath, as shown by its housing trajectory in the Hart Annual Monitoring Report 2022/23;
 - In the light of the above, the local plan housing *requirement* for Surrey Heath amounts to 5,578 dwellings over the period 2019 – 2038 (i.e. local housing need of 6,111 homes minus the 533 homes to be accommodated in Hart).



Gypsy and Traveller and Travelling Showpeople Needs

- 4.19. Surrey Heath Borough has a significant need for Gypsy and Traveller and Travelling Showpeople sites over the Plan period. Notwithstanding the work undertaken to meet needs as set out in the Gypsy and Traveller and Travelling Showpeople Site Identification Paper, 2022 it has proven challenging to find available and suitable sites to meet these needs. Capacity work has demonstrated a shortfall of Gypsy and Traveller sites.
- 4.20. The Council wrote to Hart District 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, Hart District Council advised that:
- They would encourage all sustainable options in Surrey Heath being explored before moving outside of the Borough to meet needs;
 - They support the elements of the Regulation 18 Local Plan that maximise Gypsy and Traveller delivery;
 - Hart has identified its own Gypsy and Traveller and Travelling Showpeople needs through the 2020 GTAA. A Call for Sites did not provide any suitable options. The delivery of sites will be progressed through the next Hart Local Plan.
- 4.21. HDC also responded to the Draft Surrey Heath Local Plan Additional Site Allocations for Gypsy and Travellers and Travelling Showpeople Regulation 18 consultation as set out in Appendix I.
- 4.22. 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. HDC attended the briefing. This was followed up by a further letter to neighbouring authorities regarding whether any authority was able to help meet unmet needs.

Meeting Gypsy and Traveller and Travelling Showpeople Needs Outcomes

- 4.23. The following outcomes have been agreed by the two authorities:
- That under the duty to cooperate, Surrey Heath has engaged sufficiently and appropriately with Hart on the issue of accommodation needs for Gypsies, Travellers and Travelling Showpeople. This includes presenting the findings of Surrey Heath's work to address those needs.



- That Hart supports the principle of a flexible policy approach towards sites for Gypsies, Travellers and Travelling Showpeople which has been introduced into the Surrey Heath Local Plan, intended to help address needs within Surrey Heath.
- That Hart is not in a position to address any unmet needs in Surrey Heath. Hart has identified needs of its own to address for Gypsies, Travellers and Travelling Showpeople. This presents its own challenges for Hart when preparing its next local plan without taking on unmet needs from elsewhere. Furthermore, in light of post-election announcements, Hart will prepare its next local plan in an updated national planning policy context. It is unclear at this time whether the duty to cooperate will remain in its current form.
- Whilst Hart is content that Surrey Heath has met its legal duty to cooperate obligations in terms of its engagement with Hart, Hart reserves the right to make representations on the Surrey Heath Local Plan at the Pre-Submission Regulation 19 stage, including its approach to Gypsies, Travellers and Travelling Showpeople.



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 Area¹ (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. 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. Along with Rushmoor Borough, the two authorities share a Suitable Alternative Natural Greenspace (SANG) at Hawley Meadows. Hart District Council has existing or forthcoming SANGs with catchments that cover parts of Surrey Heath Borough including Camberley Town Centre.
- 5.3. Duty to cooperate discussions between the two authorities highlighted in paragraph 3.14 above included discussion on SANG capacity. In addition, a meeting was held on 26 July 2022 with Hart, Rushmoor and Surrey Heath authorities to discuss SANG capacity. At that meeting it was identified that Rushmoor had an existing Memorandum of Understanding with Hart for the provision of SANG capacity from Hart District, and that the MoU was due to be revisited.
- 5.4. A written request for SANG capacity from Hart SANGs was made in August 2022. In December 2022, Hart District Councils Cabinet agreed [in part]:

‘to agree a Memorandum of Agreement with Surrey Heath Borough Council which, subject to agreement over mitigating the ongoing cost to Hart of maintaining reserved SANG capacity, makes available SANG capacity to deliver approximately 850 homes (2,125 persons) within Surrey Heath’ and

¹ Further detail on the Thames Basin Heaths Special Protection Area can be found in the Surrey Heath Local Plan Topic Paper: Thames Basin Heaths Special Protection Area.



‘Authorises the Executive Director – Place to engage constructively, actively and on an ongoing basis with both Rushmoor Borough Council and Surrey Heath Borough Council to jointly look at cross boundary issues associated with jointly procuring future SANG capacity’.

- 5.5. Surrey Heath’s Portfolio holder for Planning and Control attended the Hart Cabinet meeting and read a statement supporting the delivery of SANG capacity from Hart District and highlighting its importance to delivering new homes in Camberley Town Centre. A Memorandum of Agreement in relation to securing SANG from Hart District has now been signed.

Outcome of TBHSPA work

- 5.6. Both authorities agree that the outcomes of joint work on the SPA 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, particularly in relation to future SANG capacity; and
 - That both authorities will work constructively in implementing the Memorandum of Agreement that secures SANG capacity in Hart District for approximately 850 homes in Surrey Heath Borough.



6. Other Strategic Cross Boundary Planning 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 Hart District. 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 been identified as forming part of a Functional Economic Area, work undertaken on the Surrey Heath Local Plan to identify employment needs and capacity in Surrey Heath over the Plan period has indicated that those needs can be met within the Borough. Surrey Heath is not therefore seeking any unmet needs to be met elsewhere.</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 matters arise.</p>
Natural & Historic Environment and Green Belt	<p>Hart does not lie within the Green Belt and therefore there are no cross boundary matters relating to the Green Belt. Neither are there any 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 and maintain and improve recreational access.</p> <p>It is not considered that proposals in the emerging Surrey Heath Local Plan will impact on any cross boundary natural environment matters.</p>
Flooding	No cross boundary flooding issues have been identified by either authority or the Environment Agency arising from the proposed spatial strategy.
Transport	A briefing on the findings of the Strategic Highways Assessment Report was held by SHB and a draft SHAR was shared with neighbouring local authorities. Hart will respond on the findings at the Reg 19 Local Plan stage following engagement with Hampshire County Council as Highway Authority.
Social Infrastructure (Healthcare and Education)	Education - Neither HDC or either Hampshire or Surrey as local education authorities have raised any cross boundary matters and 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>Health – parts of Hart District 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 between Hart and Surrey Heath that affect delivery of the Surrey Heath Local Plan.</p>
<p>Utilities</p>	<p>Engagement with infrastructure providers has not identified any strategic cross boundary matters in relation to utilities.</p>
<p>Climate Change</p>	<p>Adapting and mitigating for climate change covers a number of other strategic cross boundary matters covered above including transport, green infrastructure and flooding. No strategic cross boundary matters with Hart District have been identified that need to be resolved to support the Surrey Heath Local Plan.</p>



Appendix I: Hart DC response to the Draft Surrey Heath Local Plan: Preferred Options

Policy	HDC Comments	SHBC Response
SSI Spatial Strategy	<p>Hart is satisfied that thus far Surrey Heath has met the duty to cooperate and notes the signed Statement of Common Ground.</p> <p>Welcome the opportunity to assess emerging evidence such as the Transport Assessment and other work on infrastructure.</p> <p>HDC confirms the inclusion on the Hart Local Plan of 41 dpa between 2014 and 2032 to contribute to unmet needs in Surrey Heath. HDC agrees that it is appropriate to deduct the 533 homes from Surrey Heath's local housing need figure to establish a 'local plan housing requirement' of 5,680 homes.</p> <p>HDC agrees that sufficient housing supply has been identified in the plan to meet needs, with a surplus of 402 homes. Consequently, there is no further unmet need to address.</p>	<p>Comments noted.</p> <p>The Strategic Highways Assessment findings and a draft IDP have been shared with HDC and Hampshire County Council as Highway Authority.</p> <p>Hart's continued commitment to the delivery of 41 dpa is welcomed.</p>
SSI Spatial Strategy	<p>HDC objects to the wording in the Draft Plan (particularly para. 2.20) which suggests that Surrey Heath, Hart and Rushmoor are still working to address needs across a Housing Market Area.</p> <p>HDC's position is that national policy has moved on, and that the Hart, Rushmoor, Surrey Heath HMA is an outdated concept based on old evidence that has not been updated.</p> <p>The start point for the Surrey Heath housing requirement is local housing need (LHN) for Surrey Heath alone, calculated using the standard method. This is the correct approach in light of current</p>	<p>The wording relating to the HMA in the Context and supporting text to Policy SSI: the Spatial Strategy Reg19 Local Plan has been amended and agreed as set out in Appendix 2.</p> <p>Whilst Surrey Heath recognises that the starting point for any housing requirement is the Governments standard methodology, and that there have been changes to national planning policy since the preparation of the Hart Local</p>



	<p>national policy. SHBC's housing need figure has not been established through any joint working on an HMA basis.</p> <p>In the event that the Surrey Heath plan must deal with any further unmet housing needs the plan should be clear that any shortfall is relevant to all neighbouring authorities when they prepare their plans, not just Hart and Rushmoor. This is in accordance with NPPF paragraph 61.</p> <p>The Draft Plan is therefore misleading when it refers to the HMA and the three authorities working together to meet needs within the HMA.</p> <p>HDC requests that such references to the HMA are deleted or clarified accordingly and reflect the agreed Statement of Common Ground.</p>	<p>Plan, it considers that there is still a need to refer to the work undertaken as a Housing Market Area as this sets the context for the commitment in the Hart Local Plan to meeting an element of unmet needs in Surrey Heath Borough.</p>
	<p>HDC notes that the Government has announced that it will remove the duty to cooperate through the 'Levelling Up' Bill. The implications of this for the SHBC local plan are not yet clear but it is an issue to be borne in mind as the plan progresses.</p>	<p>Noted.</p>
Objectives	<p>HDC supports objectives A, E, H, K and L.</p> <p>Objective A – the goal of mixed and balanced communities could perhaps be brought out more clearly in this objective.</p>	<p>Noted – no change proposed to Objective A.</p>
Gypsies and traveller Additional sites - general	<p>Welcome the fact that SHBC is willing to release Green Belt to meet needs and support the contention that exceptional circumstances exist.</p>	<p>The Council has made every effort to identify sufficient sites to meet identified needs for Gypsies and Travellers and Travelling Showpeople. In doing so the Council has:</p> <ul style="list-style-type: none"> • Undertaken several call for sites, including direct engagement with the Borough's Gypsy and Traveller and Travelling Showpeople communities;



	<p>Note that the proposed sites would meet Traveller accommodation in full, and your needs for Travelling Showpeople across the earlier part of the plan period. We urge you to make every effort to achieve optimum capacities on the traveller sites that you are allocating in the plan.</p> <p>Urge the retention of the requirements of H11 on sites of 100 or more and on Sir William Siemens Square. All sustainable options within Surrey Heath should be explored before seeking to move the need to neighbouring authorities. Hope to see a Regulation 19 version of your local plan where there is very little or no shortfall in provision for Travellers and Travelling Showpeople.</p>	<ul style="list-style-type: none"> • Undertaken an extensive review of Council owned land; • Considered the potential for existing authorised and unauthorised sites to help meet the identified needs of Gypsies and Travellers and Travelling Showpeople; • Engaged with other authorities under the duty to cooperate including holding a briefing session; • Engaged with major landowners within the Borough; • Reviewed land for sale within the Borough for its suitability for the proposed use; • Revisited site assessment work throughout the Plan preparation process. <p>Environmental, flooding and other Policy constraints, as well as land availability means that it is challenging to find deliverable sites for all housing types in the Borough, and particularly to meet the needs of Gypsies and Travellers and Travelling Showpeople.</p> <p>Following the close of the relevant Regulation 18 consultations, further feasibility work was undertaken in respect of constraints affecting sites at Land South of Broadford Lane, Swift Lane and Diamond Ridge Woods. As a result of this further feasibility work, a 5 pitch extension at Swift Lane has been concluded to be deliverable. The site falls within the Green Belt and it is considered that the high level of need, lack of alternative available sites and the relatively poor contribution that the site makes to the wider Green Belt, together constitute exceptional</p>
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		<p>circumstances to warrant an alteration to Green Belt boundaries in this location. The site is included within the Regulation 19 Local Plan accordingly.</p> <p>Sites at Land South of Broadford Lane and Diamond Ridge Woods have been identified as undeliverable and are not being carried forward in the Regulation 19 Local Plan. It has not been possible to undertake the necessary survey work to conclude if Bonds Drive Extension is deliverable as a site allocation, owing to a High Court Injunction that prohibits access to the site. Specifically, it has not been possible to undertake a preliminary ecological assessment, detailed work relating to flood risk management and mitigation, or investigations into the burial mound that is noted to be present on the site. Consequently, the site is not being taken forward as an allocation in the Regulation 19 Local Plan.</p> <p>In view of the above, despite an extensive site identification process which has included reviewing (and release of) Green Belt land, the Council acknowledges it is currently unable to meet the accommodation needs of the borough's Gypsy and Traveller community through an appropriate number of site allocations. As such, a number of Policies have been updated in the Regulation 19 Local Plan to provide a more permissive approach that encourages unallocated Gypsy and Traveller sites to come forward to help address this need. 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</p>
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		<p>countryside beyond the Green Belt. A criteria based policy at H11 has also been updated, whilst retaining requires traveller provision within housing sites of 100 or more homes.</p> <p>The Council has engaged neighbouring authorities, including Hart, in the challenges of identifying sites for Gypsies and Travellers and Travelling Showpeople in the Borough to meet identified need. This has been through written correspondence, a specific briefing session and virtual meetings. No other local authority has identified that it is able to meet unmet needs.</p>
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Appendix 2: Changes to HMA references

Supporting text to Policy SSI: Spatial Strategy

New homes

The delivery of new homes forms a key element of the Spatial Strategy. The National Planning Policy Framework (NPPF) suggests that local plans use the Government's standard method for calculating local housing needs, as set out in national Planning Practice Guidance, as the advisory starting-point for calculating Local Housing Need, unless exceptional circumstances justify an alternative approach. The Local Housing Need calculation for Surrey Heath is set out in the Strategic Land Availability Assessment (2023) (the SLAA). The Local Housing Need figure for Surrey Heath is 321 homes per year. Over the plan period (2019 – 2038), this totals 6,111 new homes.

Surrey Heath, Hart and Rushmoor councils have a long-standing track record of joint working on plan making matters. At the time of preparing the Hart and Rushmoor Local Plans, the three authorities were working together as a Housing Market Area with a joint Strategic Housing Market Assessment, supported by the NPPF which was in place at that time.

It was in that earlier context that through the duty-to-cooperate and the Hart Local Plan Examination, Hart District Council agreed to accommodate 41 dwellings per annum of unmet need arising in Surrey Heath to 2032. This commitment is set out in Policy SSI 'Spatial Strategy and Distribution of Growth' in the adopted Hart Local Plan (Strategy and Sites) 2032. The Surrey Heath and Hart District Local Plans overlap for a period of 13 years, from 2019 – 2032, which at 41 dwellings per annum provides for a total of 533 homes to be delivered in Hart to meet Surrey Heath's unmet housing need. Hart District has confirmed this commitment through duty-to-cooperate discussions.

Accordingly, Surrey Heath's Local Housing Need figure is adjusted by subtracting 41 dwellings per annum up to 2032 (533 homes in total). Surrey Heath's housing requirement over the plan period therefore becomes 5,578 homes.



Supporting text in the 'Context' Section of the Surrey Heath Local Plan

Cross-Boundary Working

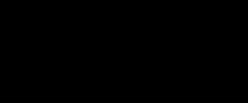
The Council is required to work with other local authorities and organisations on strategic cross boundary planning issues under a legal 'duty to cooperate'. These issues include those related to housing, employment, transport and the Thames Basin Heaths Special Protection Area.

At the time of preparation of the Hart and Rushmoor Local Plans the three authorities were identified as forming part of a Housing Market Area. The Rushmoor Local Plan 2014 – 2032 was adopted in February 2019 and the Hart Local Plan 2014 – 2032 in April 2020. Specific discussions on meeting unmet housing needs have been undertaken with Hart District Council as set out in more detail in the supporting text to Policy SSI: The Spatial Strategy. Liaison with all neighbouring authorities has also been undertaken on housing matters and other strategic cross boundary issues.

The duty to cooperate is an ongoing process and engagement with relevant duty to cooperate bodies has informed the Plan. The Council has produced a Duty to Cooperate Compliance Statement alongside the Local Plan which sets out the duty to cooperate engagement and outcomes to date. Statements of Common Ground relating to cross boundary issues have also been prepared with some key duty to cooperate partners and can be viewed on the Local Plan evidence webpage.



Signatories

Hart District Council	
Name	Councillor Alan Oliver
Position	Portfolio holder, Planning Policy and Development Management
Date Agreed	23 rd July 2024
Signature	 Daniel Hawes, Planning Policy and Economic Development Manager on behalf of Councillor Alan Oliver, Portfolio Holder for Planning Policy and Development Management

Surrey Heath Borough Council	
Name	Councillor Alan Ashbery
Position	Portfolio Holder, Homes, Planning & Enforcement
Date Agreed	30 th July 2024





Signature	
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