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To Surrey Heath Borough Council Planning Policy and Conservation Team

## **Surrey Heath Local Plan 2019-2038 Regulation 19 Pre-Submission Consultation**

Thank you for consulting Hart District Council (HDC) on your Pre-Submission Local Plan 2019-2038.

We have a strong record of cooperation with Surrey Heath Borough Council (SHBC) and we support you in progressing your plan. The only matters we wish to comment on at this stage are housing numbers and Gypsies, Travellers and Travelling Showpeople. Where we raise issues in this response, we also suggest ways forward to deal with those issues.

### **National planning policy context**

For the purposes of this representation we assume that the draft Surrey Heath Local Plan 2019-2038 (SHLP) will be examined against the December 2023 version of the NPPF and the current plan making requirements.

However, the Government published in July this year a consultation on a series of planning reforms which include revisions to the NPPF and new standard methodology to the calculation of housing numbers. We note that your plan may be affected by transitional arrangements in a new NPPF expected later this year. We would therefore welcome regular dialogue and updates as to the progress of your plan.

### **Housing numbers and duty to cooperate**

SHLP Policy SS1 Spatial Strategy sets out a housing requirement of 5,578 new homes from 2019 to 2038.

This is derived from a total local housing need figure of 6,111 homes over that period, but takes into account the commitment in the [Hart Local Plan \(Strategy and Sites\) 2032](#) to deliver on average 41 homes per annum of SHBC's needs from 2014 to 2032. For the overlapping period of the SHLP and HLP32, i.e. 2019 to 2032, this amounts to 533 homes of Surrey Heath's housing need being met within Hart. In

summary: SHBC's local housing need of 6,111 homes from 2019 to 2038, minus Hart's contribution of 533 homes from 2019 to 2032, equals the SHLP housing requirement of 5,578 homes from 2019 to 2032.

The Statement of Common Ground (SOCG) between SHBC and HDC dated July 2024 confirms HDC's commitment to deliver the number of homes equivalent to 41 homes per annum in accordance with HLP32.

The Hart Local Plan housing trajectory is front loaded in terms of the delivery of new homes, boosting the supply of market and affordable homes in the first half of the plan period, addressing housing needs early, including the 533 new homes to meet the needs of Surrey Heath.

The annex to this letter sets out the completion of new homes in Hart over the overlapping Plan periods of 1 April 2019 to 31 March 2024 (this year). This demonstrates that Hart has already delivered the 533 homes identified in paragraph 2.7 of the draft Surrey Heath Local Plan.

We therefore request a modification to the SHLP which clarifies that due to strong levels of housing delivery, Hart has already delivered all homes of Surrey Heath's 'unmet' need to 2032.

We therefore request the following change:

"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 SS1 '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 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."

It is important that this text inserted is to provide clarity for the development industry and other stakeholders.

Please note that Hart's housing completion figures are published in our [Authority Monitoring Report 2022/23](#), page 7, except for the 2023/24 figure of 434 homes which will be published in the 2023/24 AMR by December 2024.

### **Travellers and Travelling Showpeople**

The SHLP explains that over the plan period there is a need for at least 35 pitches for Travellers and 14 plots for Travelling Showpeople meeting the planning definition. There is also a need for a further pitch for Travellers whose travelling history is unknown, and 29 pitches for Traveller households that do not meet the planning definition.

Policy H11 safeguards existing sites, supports planning applications for new sites subject to various criteria, and also expects provision within sites for 100 or more homes.

Policy H12 allocates a single site for 5 traveller pitches.

Para 3.138 states:

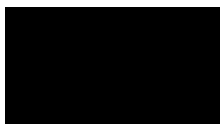
“Policy H11 supports the delivery of additional Gypsy and Traveller pitches and Travelling Showpeople plots ***in order to meet the Councils identified needs*** (our emphasis), by setting out clear criteria against which planning applications for Gypsy and Traveller and Travelling Showpeople accommodation can be assessed and by placing a requirement on strategic developments to provide Gypsy and Traveller and Travelling Showpeople provision to help meet the Borough’s identified needs for these groups.”

Hart welcomes the fact that Surrey Heath intends to meet its own needs through Policy H11 and Policy H12. *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.*

However 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.

Yours faithfully



pp Daniel Hawes, Planning Policy and Economic Development Manager

On behalf of Councillor Alan Oliver, Portfolio Holder for Planning Policy and Development Management

## Annex

1. The table below shows that from 2019 to 2024 Hart has seen a surplus of 868 homes built compared to Hart's own housing need of 4,966 homes over that period. This is 335 more homes than Hart's commitment to deliver 533 homes of Surrey Heath's housing need between 2019 and 2032.

	Hart's housing need	Surrey Heath's need being met in Hart	Total housing requirement in Hart Local Plan 2032	Homes built in Hart	HLP32 over supply	Over-supply against Hart's own needs
2019/20	382	41	423	607	184	225
2020/21	382	41	423	581	158	199
2021/22	382	41	423	582	159	200
2022/23	382	41	423	574	151	192
2023/24	382	41	423	434	11	52
2024/25	382	41	423			
2025/26	382	41	423			
2026/27	382	41	423			
2027/28	382	41	423			
2028/29	382	41	423			
2029/30	382	41	423			
2030/31	382	41	423			
2031/32	382	41	423			
	<b>4,966</b>	<b>533</b>	<b>5,499</b>	<b>2,778</b>	<b>663</b>	<b>868</b>

Source: Completions data is contained within [Hart District Council's Authority Monitoring Report 2022/23](#), except for the year 2023/24 which will be published by December 2024.

2. Whilst some housing needs, including the 533 homes for Surrey Heath, have been met early in the HLP32 plan period, we can also confirm that over HLP32 plan period as whole HDC expects to see sufficient completions to meet its local plan requirement in full. This is demonstrated in the [Hart Authority Monitoring Report 2022/23](#) (page 42), to be updated by December 2024.