



Draft Surrey Heath Local Plan:
Preferred Options (2019 – 2038)

STATEMENT of COMMON
GROUND SCG01

with Hart District Council



March 2022

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I. Introduction

- I.1. This Statement of Common Ground (SCG) has been prepared jointly between **Hart District Council** (HDC) and **Surrey Heath Borough Council**. It sets out the agreed position as at February 2022 in relation to addressing housing needs. It has been prepared to support the Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) (Draft Local Plan).
- 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 2021), 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 (those that might apply are set out in para. 20 of the NPPF). The statutory requirements of the duty to cooperate are not a choice but a legal obligation although it is not a duty to agree. Co-operation 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).
- I.4. This SCG deals solely with meeting housing needs and no other strategic planning matters. The SCG will be updated following consultation on the Draft Local Plan and the consultation response from HDC.
- I.5. Nothing in this SCG fetters any comments that Hart District Council may make on the Draft Surrey Heath Local Plan: Preferred Options consultation due to run from 14 March to 9 May 2022.
- I.6. It is recognised by both authorities that the Government is proposing changes to the way in which the housing requirement is calculated but no detail is available at the time of preparing this SCG.



2. Background

- 2.1. Hart and Surrey Heath have a long-standing track record of joint working on plan making related matters including meaningful engagement over housing allocation and delivery.
- 2.2. 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.
- 2.3. 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 section 3).
- 2.4. 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 local housing need assessment has not required any joint working on an HMA basis and all neighbouring authorities are now equally relevant in relation to discussions on unmet needs (should there be any once Hart's existing commitment is taken into account).
- 2.5. 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 co-operate, 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

- 2.6. 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.
- 2.7. Evidence prepared to support the 2018 Local Plan consultation identified a shortfall of 731 homes over the plan period and was set out in the Local Plan consultation document.



3. Hart Local Plan 2014 – 2032

Hart Local Plan Examination

- 3.1. 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”

Adopted Hart Local Plan 2014 – 2032

- 3.2. 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).
- 3.3. A formal review of the Hart Local Plan must take place no later than April 2025.



4. Progressing the Surrey Heath Local Plan 2019 - 2038

- 4.1. The starting point for deriving a housing requirement in the Surrey Heath Local Plan 2019 – 2038 is the standard methodology which gives a local housing need of 327 dwellings per annum.
- 4.2. The Borough Council has assessed the likely future housing capacity in the Borough including through a Countryside Capacity Study, and Strategic Land Availability Assessment. Both of these were shared with HDC in October 2021.
- 4.3. The work undertaken by SHBC has identified an unmet housing need. 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. Responses are set out in an Appendix to the Duty to Co-Operate Compliance Statement.
- 4.4. The outcome of the emerging Local Plan evidence and the matter of unmet housing needs has been discussed by HDC and SHBC through the following:
 - a) Virtual meeting on 15 June 2021 and agreed meeting note
 - b) Written correspondence in October 2021 formally seeking a response from HDC on the matter of unmet housing needs
 - c) Written response from HDC dated 21 December 2021
 - d) Virtual meeting 14 January 2022 and agreed meeting note
- 4.5. 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.
- 4.6. Following duty to co-operate discussions Hart District Council has confirmed in writing 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.



- 4.7. The Surrey Heath housing supply against the local housing need of 6,213 dwellings set out in the standard methodology is as set out in Table 1. This also shows total supply including that from HDC. HDC has confirmed that it cannot at this time, outside of a local plan process, commit to taking any more unmet need, and in any event notes a surplus provision of 402 homes compared to the local housing need of 6,213 homes once all sources of supply identified by Surrey Heath are factored in (see below).

Table 1: Sources of Supply 2019 – 2038

Source	Total
Completions (2019 – 2021)	728
Outstanding capacity (sites with detailed and outline planning permissions and commenced sites)	2,440
Permission lapse rate	-16
Allocated sites	2,047
Non allocated SLAA sites	426
Windfall sites	457
Total supply in Surrey Heath	6,082
Contribution from Hart District Council	533
Total supply	6,615

- 4.8. HDC made a number of comments on the Draft SLAA which have been addressed by SHBC in a revised version, again shared with HDC for comment in January 2022.




5. Outcomes

- 5.1. The duty to co-operate outcomes to date that are agreed between the two authorities are:
- 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 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.



Signatories

Hart District Council	
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Date Agreed	4/3/22
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