



SURREY HEATH BOROUGH COUNCIL

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

# STATEMENT of COMMON GROUND SCG02

with Rushmoor Borough Council



**March 2022**

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## 1. Introduction

- 1.1. 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 March 2022 in relation to housing needs. It has been prepared to support the Draft Surrey Heath Local Plan: Preferred Options (2019 – 2038) (Draft Local Plan).
- 1.2. 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.
- 1.3. The duty to cooperate applies to strategic cross boundary matters. The statutory requirements of the duty to co-operate 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).
- 1.4. 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 RBC.
- 1.5. A separate SCG (SCG01) has been prepared with Hart District Council.
- 1.6. Nothing in this SCG fetters any comments that Rushmoor Borough Council may make on the Draft Surrey Heath Local Plan: Preferred Options consultation due to run from 14 March to 9 May 2022.
- 1.7. It is recognised by both authorities that the Government is proposing changes to the way in which the housing requirement is calculated. These changes are anticipated in Spring 2022 but no detail is available at the time of preparing this SCG.



## 2. Background

- 2.1. Rushmoor and Surrey Heath, along with Hart District Council have a long-standing track record of joint working on plan making related matters including meaningful engagement over housing allocation and delivery.
- 2.2. The three authorities have been identified as comprising a Housing Market Area and a first Strategic Housing Market Assessment (SHMA) was prepared jointly in 2009 with a
- 2.3. 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.
- 2.4. In 2017 the Government introduced a new 'standard approach' to calculating housing need to replace the previous guidance on the calculation of objectively assessed housing need in housing market areas.
- 2.5. Previous SCGs in relation to the preparation of the Hart and Rushmoor Local Plans
- 2.6. (January 2018 and November 2018) have recognised under the duty to co-operate, that Surrey Heath is heavily constrained. These constraints mean that it has a restricted land supply. A high proportion of the Borough is subject to national planning constraints and policies such as Green Belt and SSSIs. Other land availability issues and environmental constraints such as the Thames Basin Heaths Special Protection Area and associated buffer zone further impact on available supply.

### **Surrey Heath Local Plan consultation 2018**

- 2.7. 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 to housing need and included an indicative requirement of 352 dwellings per annum.
- 2.8. 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. 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. This flexibility includes reliance on delivery at the strategic allocation at Wellesley and delivery of urban regeneration sites. The Rushmoor Local Plan Inspector considered that this was a robust approach in the context of Rushmoor’s specific characteristics.
- 3.3. Having regard to the date of adoption and to the likelihood of potential changes to national planning policy no formal review of the Rushmoor Local Plan has started.



## 4. Progressing the Surrey Heath Local Plan 2019 - 2038

- 4.1. The housing requirement in the Surrey Heath Local Plan 2019 – 2038 is based on the standard methodology which gives a requirement of 327 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. Both of these were shared with RBC in October 2021.
- 4.2. Work undertaken by SHBC has identified a 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].
- 4.3. The outcome of the emerging Local Plan evidence and the matter of unmet housing needs has been discussed by RBC and SHBC through the following:
  - a) Virtual meeting on 12 July 2021 and agreed meeting note;
  - b) Written correspondence in October 2021 formally seeking a response from RBC on the matter of unmet housing needs (and similar letter sent to Hart);
  - c) Written response from RBC dated 2 December 2021
- 4.4. 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.
- 4.5. At the time of the Hart Local Plan examination, Surrey Heath made representations regarding unmet needs of 731 dwellings over the period to 2032. This was accepted by the Hart Local Plan Inspector and an allowance for 41 dpa is included in the adopted Hart Local Plan requirement (2014 – 2032). 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.
- 4.6. The Surrey Heath housing supply against the Local Housing Need of 6,213 dwellings set out in the standard methodology is as set out below:



**Table 1: Sources of Supply 2019 – 2038**

<b>Source</b>	<b>Total</b>
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
<b>Total</b>	<b>6,082</b>

- 4.7. In D2C discussions and formal written response in December 2021 RBC has reiterated the need for flexibility in its housing supply. Since the 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.
- 4.8. Rushmoor Borough Council has confirmed that it is therefore unable to meet any unmet needs arising in Surrey Heath.




## 5. Outcomes

- 5.1. The duty to co-operate outcomes to date that are agreed between the two authorities are:
- a) Agreement to the general process and outcomes taken by SHBC to identify future housing capacity;
  - b) 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;
  - c) Recognition that across the HMA there is a commitment in the Hart Local Plan to deliver 41 dpa of unmet needs in Surrey Heath (over the period 2019 – 2032);
  - d) 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

<b>Rushmoor Borough Council</b>	
Name	Tim Mills
Position	Head of Economy, Strategic Housing and Planning
Date Agreed	02.03.22
Signature	

<b>Surrey Heath Borough Council</b>	
Name	Jane Reeves
Position	Planning Policy and Conservation Manager
Date Agreed	07.03.22
Signature	<i>Jane Reeves</i>

