

RUSHMOOR LOCAL PLAN EXAMINATION

Legal Requirements and Procedural Matters

Q1: Has the LP been prepared in accordance with the Duty to Co-operate and does it fully meet this legal requirement? What are the key outcomes from the co-operation with neighbouring authorities? Is the housing market area agreed with adjoining authorities and is it suitably defined having regard to the Planning Practice Guidance (PPG) (ID2a-011-20140306)? Should Rushmoor make an allowance in its plan to accommodate unmet needs in the HMA? In particular, has consideration been given to meeting unmet need in Surrey Heath?

We do not have any concerns regarding the definition of the housing market area (HMA), however, we do not consider sufficient consideration has been given to the degree of unmet needs that are likely to arise within Surrey Heath Borough Council (SHBC). The NPPF establishes in paragraph 47 that the objectively assessed need for housing within the HMA must be met in full. The NPPF goes on to state in paragraph 179 that “...*joint working should enable local planning authorities to work together to meet development requirements which cannot be wholly met within their own areas*”. Given that Surrey Heath have stated in their representations to this Local Plan that they are unlikely to be able to meet housing needs within their area it is incumbent on both Rushmoor Borough Council and Hart District Council (HDC) to consider how they can increase delivery within their own local plans to address unmet needs arising within Surrey Heath.

We acknowledge that SHBC are still in the early stages of producing a new local plan and that as such the delivery capacity within the Borough are still to be tested. However, SHDC have provided some indication as to the likely shortfall in meeting their OAN. HDC have recently published, as part of the consultation on their submission local plan, a Duty to Co-operate statement which indicates in paragraph 16 that SHBC are likely to fall short of meeting their housing needs by between 950 and 1,500 homes against the Government’s indicative figures. This is a significant shortfall and there must be doubt as to whether SHBC will be able to close this shortfall given both the physical capacity and the policy constraints faced by that Council. If these unmet needs are not considered in the local plans of Rushmoor and Hart the unmet needs arising from Surrey Heath will not be addressed until these plans are required to be reviewed in five years’ time.

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