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Louise Piper
Rushmoor Borough Council
Council Offices
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13th June 2017

By email only

Dear Louise,

Rushmoor Proposed Submission Local Plan Regulation 19 Consultation

Thank you for consulting Surrey Heath Borough Council on the Rushmoor Proposed Submission Local Plan.

Together this letter and the attached completed consultation form provide the Council's formal response to the consultation.

Meeting Housing Need in the Housing Market Area

Surrey Heath Borough Council welcomes the spatial approach taken within the "Draft Submission" Local Plan consultation document, which indicates that Rushmoor is in a position to meet its own housing need, delivering at least 7,850 new dwellings in the Borough.

It is also noted that the Plan recognises that to satisfy the test that a local plan has been prepared positively, local planning authorities should also anticipate meeting unmet requirements from neighbouring authorities where it is reasonable to do so and is consistent with achieving sustainable development.

As you will be aware through previous discussions and our Duty to Co-operate letter dated the 19th January 2017, Surrey Heath is severely constrained in terms of available land for housing development, primarily through the Thames Basin Heaths Special

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Protection Area (SPA) and the need to provide avoidance measures in respect of the impact of housing on the SPA. The Borough also has large areas of MOD operational land and Green Belt.

Surrey Heath is now in the early stages of developing a new Local Plan and continues to develop a broad range of appropriate evidence to enable it to make robust decisions in respect of the extent that the Plan is able to meet the OAHN for Surrey Heath. However, the Council's most recent Strategic Land Availability Assessment (July 2016) indicates that there will be a shortfall of land within the Borough to deliver the Council's OAHN and whilst the Council will consider spatial strategies that could reduce this shortfall in the course of preparing the new Local Plan, it is unlikely that Surrey Heath will be in a position to meet the full OAHN for the Borough.

Taking the Council's current position into account, Surrey Heath would raise concerns that the Draft Submission Local Plan indicates that there is no opportunity to increase housing delivery beyond the identified level to assist the HMA partners with meeting any demonstrated unmet need. Surrey Heath would welcome clarification as to why the Plan does not allow for any flexibility in the event that there is any unforeseen change in circumstances across the plan period and in respect of why the projected surplus of 850 units cannot be made available to assist Surrey Heath in meeting any demonstrated unmet need.

We envisage that these concerns can be addressed through ongoing work under the duty to cooperate.

Employment

Surrey Heath welcomes the spatial approach taken within the "Draft Submission" Local Plan consultation document, which seeks to maintain and enhance the Borough's position as a prosperous economic centre by protecting and enabling the regeneration of existing strategic and locally important employment sites.

Retail

The Rushmoor Retail Study the Venuescore Retail Shopping Index (2013) indicates that Camberley is a regional location grade with Farnborough a sub-regional location grade and Aldershot a major district grade. Whilst there is support for the approach of maintaining the vitality and viability of town centres within the Blackwater Valley Surrey Heath considers that Rushmoor needs to be satisfied that the existing retail hierarchy in the Blackwater Valley is maintained.

Farnborough Airport

Surrey Heath recognises that the "Draft Submission" Local Plan sets out a suite of Policies addressing air traffic movements to and from Farnborough Airport and welcomes the approach taken. This seeks to ensure the amenity of local residents and reflects the preferred approach set out within the Rushmoor "Preferred Approach" Local Plan consultation document.

Surrey Heath Borough Council looks forward to continuing to work with Rushmoor in respect of housing and other Local Plan matters as each of the Authorities Local Plan progresses.

Yours Sincerely,

Kate Galloway
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