

Response to Rushmoor Borough Council's Draft Submission Local Plan consultation

Summary

Rushmoor Borough Council has published its "Draft Submission" Local Plan document for consultation. The Consultation began on the 9th June and runs until the 21st July.

The document is the last stage in the production of the Rushmoor Local Plan and as such the consultation is the final opportunity to comment on the Plan before it is submitted to the Planning Inspectorate in the Autumn. It sets out the approach to be taken to development in Rushmoor Borough up to 2032.

Rushmoor, along with Hart, forms the Housing Market Area and the Functional Economic Area for Surrey Heath.

Members are requested to consider the proposed consultation response set out in the letter at Annex 2 of this report as the Borough's formal representations on the "Draft Submission" Local Plan Document.

Portfolio - Regulatory

Date Portfolio Holder signed off report 19 June 2017

Wards Affected

All

Recommendation

The Executive is asked to RESOLVE that the letter contained in Annex 2 be authorised as Surrey Heath Borough Council's formal representation to the Rushmoor "Draft Submission" Local Plan document.

1. Resource Implications

- 1.1 There are no resource implications beyond that provided for within the agreed budget for 2017/18.

2. Key Issues

- 2.1 In June 2015, Rushmoor Borough Council published a "Preferred Approach" Local Plan, which was subject to a six-week consultation period. Surrey Heath responded to the Consultation and a copy of the response is provided at Annex 1.
- 2.2 The Rushmoor "Draft Submission" Local Plan sets out the approach that Rushmoor Borough Council will take in delivering housing (and other development) in Rushmoor to 2032. The current consultation is

the final opportunity to comment on the plan before it is submitted to the Planning Inspectorate in the autumn.

- 2.3 Rushmoor, along with Surrey Heath and Hart, forms a Housing Market Area. There is a requirement for the Housing Market Area to seek to meet the Objectively Assessed Housing Need for that area, as set out in the Strategic Housing Market Assessment for the area. In the first instance each Authority should seek to meet their identified housing need within their own area; however, where this is demonstrably unachievable, efforts should be made to accommodate any unmet housing need elsewhere within the Housing Market Area.
- 2.4 Surrey Heath is severely constrained in terms of available land for housing development, primarily through the Thames Basin Heaths Special 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. It is therefore unlikely that Surrey Heath will be able to meet the Objectively Assessed Housing Need identified for the Borough. It is necessary to raise this issue with our Housing Market Area partners as they prepare their Local Plans to ensure that the identified housing need can be met within the Housing Market Area. This matter has already been raised with Rushmoor, within the Council's response to the "Preferred Approach" consultation (see Annex 1).
- 2.5 Within the "Draft Submission" Local Plan consultation document, it is indicated that Rushmoor is in a position to meet its own housing need with an estimated surplus of around 850 units to provide flexibility should there be unimplemented, or slower implementation of, housing schemes because of unforeseen circumstances. Rushmoor has indicated that they are not in a position to assist other authorities in meeting any shortfall they may be expecting or have in meeting their identified OAHN. 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.
- 2.6 The combined Surrey Heath, Hart and Rushmoor area is also identified as a Functional Economic Area and it is necessary that the authorities plan for future demand. The Rushmoor "Draft Submission" Local Plan 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. This reflects Surrey Heath's expected approach to meeting future employment needs.
- 2.7 The "Draft Submission" Local Plan indicates that retail development will be focused in Aldershot and Farnborough town centres, with the Aldershot catchment having long term capacity to support up to

11,700sqm of A1-A5 uses (shops, financial and professional services, restaurants/cafes, drinking establishments and hot food takeaways) and Farnborough having long term capacity for up to 21,600sqm of A1-A5 uses. 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.

- 2.8 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.

3. Options

- 3.1 The options are to:

- (i) Agree the response set out in the letter (Annex 2) and to submit them as the Council’s formal response to the Rushmoor “Draft Submission” Local Plan consultation;
- (ii.) To agree the response set out in the letter (Annex 2) with any additional comments from Executive and to submit them as the Council’s formal response to the Rushmoor “Draft Submission” Local Plan; or
- (iii.) To not agree the response.

4. Proposals

- 4.1 That the report, letter and consultation response form are noted.

5. Supporting Information

- 5.1 The Rushmoor “Draft Submission” Local Plan June 2017.

6. Corporate Objectives And Key Priorities

- 6.1 Responding to the Rushmoor “Draft Submission” Local Plan consultation will enable Surrey Heath to maintain an active engagement with an adjoining Borough where there are matters of strategic importance between the Boroughs.

7. Policy Framework

- 7.1 Making a representation on the Rushmoor “Draft Submission” Local Plan will enable Surrey Heath to formally draw Rushmoor’s attention to comments it has in relation to the Rushmoor’s “Draft Submission” Local Plan.

Annexes	Annex 1: Form setting out the Council’s response to the Rushmoor “Preferred Approach” Local Plan 2015; Annex 2: Letter to Rushmoor setting out the Council’s response to the “Draft Submission” Local Plan.
Background Papers	Rushmoor “Draft Submission” Local Plan
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Consultations, Implications and Issues Addressed

Resources	Required	Consulted
Revenue	✓	<u>14/06/17</u>
Capital		
Human Resources		
Asset Management		
IT		
Other Issues	Required	Consulted
Corporate Objectives & Key Priorities	✓	<u>14/06/17</u>
Policy Framework		
Legal	✓	<u>14/06/17</u>
Governance		
Sustainability		
Risk Management		
Equalities Impact Assessment		
Community Safety		
Human Rights		
Consultation	✓	<u>14/06/17</u>
P R & Marketing	✓	<u>14/06/17</u>