

## **CABINET**

**DATE OF MEETING: 1 DECEMBER 2022**

### **TITLE OF REPORT: UPDATE ON SUITABLE ALTERNATIVE NATURAL GREENSPACE (SANG)**

**Report of: Chief Executive/Planning Policy Manager**

**Cabinet Portfolio: Planning/Corporate**

**Key Decision: No**

**Confidentiality: None**

### **PURPOSE OF REPORT**

1. The purpose of this report is to update Cabinet on the amount of Suitable Alternative Natural Greenspace (SANG) available in Hart, to consider how it should best be used to meet Hart's and its neighbour's needs and ensure that sufficient funding is provided so that no financial burden falls on Hart.

### **RECOMMENDATIONS**

2. That Cabinet
  - a) notes the SANG monitoring figures at Appendix 1.
  - b) Authorises the Chief Executive
    - i. to invoke Clause 9.1 of the 2017 Memorandum of Agreement between Hart District Council and Rushmoor Borough Council and authorises the Chief Executive to agree a revised Memorandum of Agreement with Rushmoor which, subject to agreement over mitigating the ongoing cost to Hart of maintaining reserved SANG capacity, makes SANG capacity available to deliver approximately 325 homes (780 persons) within Rushmoor.
    - ii. to agree a Memorandum of Agreement with Surrey Heath Borough Council which, subject to agreement over mitigating the ongoing cost to Hart of maintaining reserved SANG capacity, makes available SANG capacity to deliver approximately 850 homes (2,125 persons) within Surrey Heath
  - c) Authorises the Executive Director - Place to engage constructively, actively and on an ongoing basis with both Rushmoor Borough Council and Surrey Heath Brough Council to jointly look at cross boundary issue associated with jointly procuring future SANG capacity.

### **BACKGROUND**

3. SANG and SAMM<sup>1</sup> mitigation is required to enable new housing in proximity to the Thames Basin Heaths Special Protection Area (SPA). This approach is enshrined in Policy NBE3 of the Local Plan 2032.

---

<sup>1</sup> Strategic Access Management and Monitoring

4. The Council has no specific privilege in providing SANG. There are several SANGs around the district, some Council-owned, others not, some still with capacity to mitigate new development, and some new ones planned. Anyone seeking to access SANG therefore have a range of providers that they can approach.
5. Sufficient SANG is present or planned to deliver the specific housing numbers in the Local Plan 2032. However, the release of Council-owned SANG is now almost exhausted which means that there is limited capacity from Hart owned SANGs going forward to accommodate 'windfall' development.

## **PRESSURES ON SANG CAPACITY**

6. Appendix 1 shows remaining capacity (measured in 'persons' averaged at @ 2.4 persons/home) at Hart's various SANGs.
7. Appendix 1 Table 1 lists the SANGs in Council control which currently have, or will have, capacity to mitigate new homes. Table 2 lists the SANGs which are either at capacity already or have capacity but are outside the Council's control.
8. Referring to Table 1, at present there are two Council-controlled SANGs for developments to buy into:
  - Bramshot Farm which has 1,288 persons capacity left (approx. 540 homes) *although most of this is currently set aside for Rushmoor to under a 2017 Memorandum of Agreement: see Cabinet 6 July 2017.*
  - Whitewater Meadows, Hook which has 67 persons capacity left (approx. 28 homes).
9. The amount available for Hart at present is therefore quite low, although the following SANGs are expected to become available over the next year or two:
  - Hawley Park Farm
  - Moulsham Lane (Yateley)
  - Grove Farm
  - Albany Park North/ Poulsters Meadow (Church Crookham)

### **Bramshot Farm and Hawley Park Farm**

10. These two SANGs are close to Rushmoor and Surrey Heath and as such are well placed to mitigate development in their respective areas.
11. A Memorandum of Agreement (MoA) currently in place with Rushmoor (which is up for review) provides Rushmoor with 3,600 persons (around 1,500 homes) of capacity (in total) from both Bramshot Farm and Hawley Park Farm SANG.
12. Rushmoor has however, only used 923 persons (around 385 homes) of that capacity, and so, unless reviewed in accordance with paragraph 9.1 of the MoA, it still has reserved access to a further 2,677 persons (approx. 1,115 homes). This leaves Hart with just 279 persons (around 116 homes) from both Bramshot Farm and Hawley Park Farm SANG. This is not enough.
13. Rushmoor has indicated it would like to retain the MoA in its current form. However, a review of the MoA is triggered by MoA Clause 9.1. Rushmoor has since 2018 secured alternative SANG capacity at Southwood which overlaps the catchment of both Bramshot Farm and Hawley Park SANG.

14. The delivery of the Southwood SANG within Rushmoor has released capacity for approximately 2,450 dwellings to support the regeneration of Aldershot and Farnborough Town centres, specifically
  - The Galleries, Aldershot
  - Union Street, Aldershot
  - Hippodrome House, Aldershot
  - Aldershot Railway Station
  - Farnborough Civic Quarter and
  - any other sites considered to represent strategically important development ([Rushmoor Avoidance and Mitigation Strategy 2022](#))
15. This represents a significant material change in Rushmoor's previously projected limited SANG capacity and it includes at Southwood approximately 1,000 homes (approx. 2,400 persons) which would otherwise have been delivered in Hart's Bramshot/Hawley Park Farm SANGs.
16. The background to Clause 9.1 was the concern if Rushmoor were not to take up its allocated capacity in a timely manner, Hart would end up unnecessarily holding back significant capacity that could otherwise be redistributed to support development in both Hart and Surrey Heath.
17. Moreover, without the anticipated income or support from developments in Rushmoor, it results in Hart incurring significant and ongoing revenue and loan repayment costs in maintaining Bramshot Farm SANG.

#### **What does Hart need?**

18. Hart has a healthy stock of planning permissions for new homes where SANG has already been secured. However most future windfall sites will need SANG.
  - Years 4 and 5 of Hart's current five-year housing land supply (2025/26 and 2026/27) includes 180 homes from windfall sites that do not have permission, the bulk of which will need SANG (approx 432 persons).
  - 630 homes from windfall sites are predicted from April 2025 to March 2032 (90 homes per year – see housing trajectory on page 30 of the [Five Year Housing Land Position Statement](#)). This number of homes equates to around 1,500 persons of capacity.

#### **Future Council controlled SANG**

19. More Council-controlled SANG is coming forward with major developments at Moulsham Lane, Yateley; Grove Farm, West Fleet, and Poulter's Meadow, Church Crookham. These SANG bring the remaining capacity up to 4,887 persons (around 2,040 homes).

#### **Surrey Heath**

20. Surrey Heath is preparing a new local plan and is requesting 850 homes (approx. 2,040 persons) of capacity from either/or Bramshot or Hawley Park SANG:
  - iii. 550 homes capacity (around 1,375 persons) to unlock development in Camberley town centre – 'London Road Block'.
  - iv. 300 homes capacity (750 persons) to support developments in Frimley, such as Sir Williams Siemens Square and smaller

developments across Frimley and Camberley. Capacity for 300 homes would enable delivery of this allocated site as well as smaller scale SLAA sites and windfalls.

21. Surrey Heath has offered to work up support funding to help mitigate the cost to Hart of reserving spare capacity. The specific approach is still to be agreed.

#### **SANG needs v SANG capacity**

22. It can be seen that there is competing pressure on the SANG which is summarised in the table below.

|   | <b>Persons</b> | <b>Comment</b>  |
|---|----------------|---|
| Hart's needs  | 1,500          | Future windfall in Hart to 2032   |
| Rushmoor's share under current MoA                    | 2,677          | 3,600 in the MoA minus the 923 persons already used   |
| Surrey Heath's request                                | 2,125          |   |
| <b>Total needed/ requested from all 3 authorities</b> | <b>6,314</b>   |   |
| Total spare SANG capacity in Hart                     | 4,887          | Total current and future Council-controlled SANG capacity   |
| Shortfall   | -1,427         | Hart is 1,427 persons worth of capacity short of satisfying its own needs and the requests from Rushmoor and Surrey Heath combined. |

#### **CONSIDERATIONS**

23. There is an urgent need to review the MoA arrangements with Rushmoor. Rushmoor's delivery of its Southwood SANG represents a significant material change in circumstances and so triggers the MoA review Clause 9.1.
24. Rushmoor was already slow to take up its originally anticipated 1,500 new home (3,600 person) allocation. The MoA anticipated that by 2022 Rushmoor would have taken up a capacity allocation of around 1,175 new homes (2,820 persons). Instead, it has reallocated a significant proportion of its originally anticipated allocation into the Southwood SANG and, in the meantime, sought to access SANG capacity in Hart for only 385 new homes (923 persons) i.e. 790 homes (1,897 persons) fewer than anticipated in the indicative phasing plan included in clause 4.1 of the MoA.
25. The recommendation is that this excess capacity of 790 new homes (1,897 persons) should be released to be redistributed across Hart and Surrey Heath. This, subject to an agreement on support funding from both Surrey Heath and Rushmoor, would result in Hart still reserving 325 homes (780 persons) for Rushmoor and also being able to support the delivery on 850 homes (2,125 persons) in Surrey Heath.

|  | <b>Persons</b>                    | <b>Comment</b>   |
|--|-----------------------------------|--|
| Hart's needs   | 1,500 (625 homes)                 | Future windfall in Hart to 2032  |
| Rushmoor's share under adjusted MoA                      | 780 (325 homes)                   | 3,600 in the MoA minus the anticipated 2017-2022 2820 persons adjustment |
| Surrey Heath's request                                   | 2,125 (850 homes)                 |  |
| <b>Total adjusted requirement from all 3 authorities</b> | <b>4,405 (approx. 1800 homes)</b> |  |
| Total spare SANG capacity in Hart                        | 4,887                             | Total current and future Council-controlled SANG capacity                |
| Surplus capacity   | <b>482 (around 200 homes)</b>     |  |

## **POLICY IMPLICATIONS**

26. This report recommends an update to the Council-controlled SANG allocations but no fundamental changes in approach. Other than that, there are no immediate policy implications arising. However, it should be noted that future planning policy in Hart could be affected if neighbouring authorities cannot meet their housing needs due to a genuine lack of opportunities for SPA avoidance and mitigation. Therefore, there is a further recommendation that under the duty to cooperate that Rushmoor and Surrey Heath work to jointly seek to secure suitable SANG capacity to support the delivery of future housing needs.

## **FINANCIAL AND RESOURCE IMPLICATIONS**

27. The effective release of SANG supports neighbouring authorities meet their need for new homes. It also supports the opportunities for town centre and other regeneration. However, Hart cannot alone shoulder the significant on-going cost of procuring, administering, or maintaining SANG without financial support from our neighbours. The capital and revenue cost burden placed upon Hart would otherwise be too great. There is therefore, a need to ensure that where SANG capacity is reserved a suitable arrangement is put in place to ensure that the costs of both procuring and also maintaining an operational SANG is reflected in any agreement.

## **RISK MANAGEMENT**

28. There are no risk management implications associated with this report.

## **EQUALITIES**

29. There are no equalities implications associated with this report.

## **CLIMATE CHANGE IMPLICATIONS**

30. There are no climate change implications associated with this report.

## **ACTION**

31. Subject to Cabinet approval, discussions will take place with both Rushmoor and Surrey Heath to agree appropriate Memorandum of Agreements to support the delivery of SANG capacity within the respective areas.

**Contact Details:** Daniel Hawes [daniel.hawes@hart.gov.uk](mailto:daniel.hawes@hart.gov.uk)