



Department for Levelling Up,  
Housing & Communities

**Rt Hon Christopher Pincher MP**  
*Minister of State for Housing*

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Cllr Richard Millard  
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25<sup>th</sup> November 2021

*Dear Cllr. Millard,*

Thank you for your letter of 20 October regarding emerging planning policy, the use of the standard method to calculate housing needs and the direction of travel regarding greenfield development. I hope you will appreciate that Ministers' quasi-judicial role in the planning system imposes a strict duty of impartiality and that I cannot comment on specific plans or proposals.

First, I must mention that having an effective, up to date plan in place is essential to planning for and meeting housing requirements in ways that make good use of land and result in well-designed and attractive places to live. The Government expects local authorities to work together to plan for and deliver the housing and infrastructure our communities need. The Government's priority for getting plans in place by 2023 has not changed. After the consultation on the White Paper last year, I clearly reiterated the importance of having up to date plans in place in my Written Ministerial Statement of 19 January 2021. Plan makers should continue to prioritise getting up to date plans in place under the relevant National Planning Policy Framework (NPPF) by this date.

Current policy is clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. This position has not changed. Policy also makes clear that an alternative approach, which also reflects current and future demographic trends and market signals, can be used where exceptional circumstances justify this.

Regarding National Parks specifically, the Housing and Economic Needs Assessment section of the Planning Practice Guidance (PPG) explains that for areas where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available, such as in National Parks, an alternative approach will have to be used. Ultimately, this alternative method is at the discretion of local authorities to decide – local authorities will need to consider the factors they deem relevant in determining that alternative method. The PPG sets out further advice on this and makes clear that any alternative method can expect to be scrutinised closely at examination by the Planning Inspectorate.

In plan-making terms the standard method is only the starting point in the process of planning for new homes and does not provide a target. Councils decide their own housing requirement once

they have considered their ability to meet their own needs in their area. This includes taking local constraints (such as Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty) into account and working with neighbouring authorities if it would be more appropriate for needs to be met elsewhere.

I would like to reaffirm what the National Planning Policy Framework says when considering the relationship between meeting housing needs and protected land. The presumption in favour of sustainable development for plan-making sets out that:

*“Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”*

The protected areas or assets of particular importance mentioned above are then defined in Footnote 7 and include designations in your authority such as National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest, a combination of which I am aware covers 58% of your total land area.

You reference brownfield sites, so I would also like to reaffirm this Government's commitment to the development of brownfield land. The NPPF strongly encourages the reuse of suitable brownfield land- especially for development to meet housing need and regenerate our town centres. We are committed to making the most of brownfield land and the Government is putting significant investment into brownfield redevelopment.

In relation to future changes to the planning system, an announcement on our proposed way forward for the planning reforms will be made shortly. In the meantime, local authorities should continue work on meeting the deadline the Government has set to have an up-to-date Local Plan in place by the end of 2023. This will ensure we can build back better and continue to deliver the homes that are needed across England. As further decisions are taken on any changes to the planning system, including any changes to Local Plan production, local authorities and other stakeholders will be kept informed.

Local Authorities are more at risk of appeals and speculative planning applications being successful if they do not have a Local Plan setting out an up-to-date housing requirement, as the presumption in favour of sustainable development applies. The latest Housing Delivery Test results show that the majority of those Local Authorities delivering 75% or less of the housing they need, have a plan over 5 years old at the time of results publication – this underlines the importance of having an up-to-date plan and proactively supporting development in a plan-led way.

I would like to thank you for the feedback you have provided on this important matter.



**RT HON CHRISTOPHER PINCHER MP**