

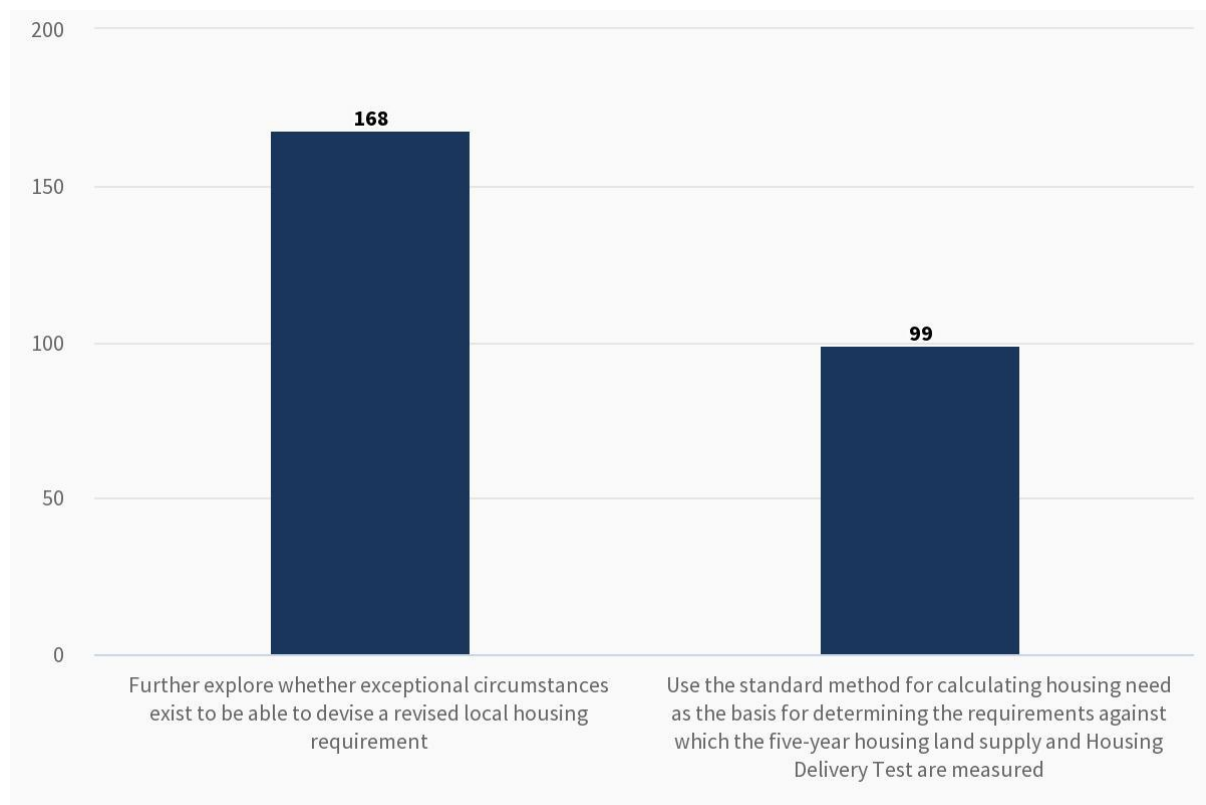
Population and Housing

<https://ehdclocalplan.commonplace.is/en-GB/proposals/population-housing/step1>

POP1 How do you think we should proceed?

Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement, or

Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured.



168 respondents (63%) selected 'Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement'.

99 respondents (37%) selected 'Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured'.

POP1a Please explain your answer

Explanations provided by those who selected 'Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured'.

Evidence / justification / accuracy / certainty / continuity

We agree with the Council's evidence and Technical Note that there are no exceptional circumstances in East Hampshire to warrant the use of an alternative methodology.
The district enjoys good connections and a number of sustainable settlements. This includes the tier 1 settlement of Liphook which has capacity and potential to grow and features a wide range of services and facilities capable of supporting day to day activities for residents, and excellent road and rail connections. Accordingly there is no justification to depart from the standard methodology for calculating local housing need.
On the given information there appears to be no justification for taking other parameters
It is not considered there are any reasons as to why East Hampshire is not capable of meeting its entire housing need.
Based on what is said, there would be little point in exploring exceptional circumstances to revise the figure.
no evidence of exceptional circumstances
The evidence shows no need to change from the standard method
Better not to risk that a non standard method could later be challenged
The standard method appears to give sufficiently accurate results.
Final figures seem fine. Unable to comment on detail.
costs and time wasted in producing another piece of research
Using the standard method sounds ok. But EHDC should then stick to the figure it produces, not go above that number.
Because it gives clarity and certainty
For continuity the Council should use the standard method of calculating housing need in accordance with the National Planning Policy Framework.
Less of a challenge from central govt
It is a system that seems to work, and let's face it now system is perfect!

This is the recommended way for calculating housing need by Central Government and should be used unless exceptional circumstances exist.

the NPPF (paragraph 61) states that the local housing need should be calculated using the standard methodology, unless exceptional circumstances justify an alternative approach. In examining local plans, Inspectors have found that for exceptional circumstances to exist, a large proportion of the district must be affected by absolute constraints of high-order policy constraints, for example Green Belt, AONB, SSSIs, National Parks or flood risk. EHDC is not subject to these constraints, and this Local Plan specifically excludes the SDNP area. The district enjoys good connections and a number of sustainable settlements. This includes the tier 1 settlement of Liphook which has capacity and potential to grow and features a wide range of services and facilities capable of supporting day to day activities for residents, and excellent road and rail connections. Accordingly there is no justification to depart from the standard methodology for calculating local housing need.

Time/resource

Seems that the need in the area is so small that there is no point in wasting more time recalculating the value

Further exploration implies delay and there has already been considerable research

It is extremely unlikely that EHDC will be able to make a sound case for having exceptional circumstances. To attempt this and lose would add delay and cost and leave EHDC without an adopted Local Plan for even longer.

We are not different. The numbers are tiny in the overall scheme of things. Please don't waste more of our money trying to justify something else.

costs and time wasted in producing another piece of research

No need to try to re-design the wheel: the standard method seems perfectly good.

This sort of exercise would be very technical and then discounted by others (e.g. SDNP)

Belport consider that the Council was correct to explore whether exceptional circumstances existing to justify a revised local housing requirement. Going forward, Belport recommend that the outcome of that objective, evidence-based process (that exceptional circumstance do not exist) should be accepted. To explore this issue further could lead to a substantive delay the Local Plan process, leaving the Council without an up-to-date Local Plan. As you will be fully aware, the absence of an up-to-date Local Plan leaves the Council exposed to speculative, unplanned housing development which the Council is unable to properly control. Belport thereby suggest that, in the interests of proper, strategic planning (and all of the benefits that this delivers for the communities of East Hampshire) the Council should accept the standard method housing requirement and progress the new Local Plan accordingly. It is noted that whilst the current consultation on the revised National Planning Policy Framework (NPPF) states that the standard method is an advisory starting-point for establishing a housing requirement for the area, an alternative approach to assessing housing needs still requires exceptional circumstances. It is also noted the draft revised NPPF does not alter the need to have an up-to-date local plan. In all practical terms the draft revised NPPF continues to require the Council to accept the standard method in the preparation of the new Local Plan.

Material difference

No material difference in results using the two methods
The above data indicates little difference between the methods, although this is counter intuitive
There appears to be little point in wasting considerable time and effort in pursuing an alternative method for the sake of a very few homes per year. The focus should be on meeting (or coming close to meeting) the target rather than arguing about the rules. However, the LPA should not willingly take on additional quotas from the SDNPA or other neighbouring districts.

Housing needs

House prices are too high for lots of young people do we need more houses built in our area not less. Local people should be able to stay local rather than have to move due to shortage of housing in our area
This is the minimum approach necessary to address the significant housing needs and affordability issues surrounding housing delivery in East Hampshire where accessing housing needs is beyond the reach of a large part of the population.
Any deviation from the standard method would detrimentally impact the affordability across EHDC.

Other comments

These are technical issues for professional planners.
I can believe the figures obtained
I lack the knowledge and experience to answer this question
Who gets to Define 'exceptional circumstances' so they can build where they like?
The 2014 forecasts of population growth have been exceeded locally due to the pandemic and the flight from London. That is reversing now. .
East Hampshire is a large area with a lot of brownfield sites for redevelopment
Am not sure that building in a National Park is warranted. Many brownfield eg ex Army opportunities exist. East Hampshire is an area that could sustain high numbers of good affordable housing. To accept a lower figure than the normal median would be underuse of the areas potential.
Housing should be measured against and implemented only in suitable areas that can successfully support it based on genuine needs and not desires
Gives flexibility to the local plan.

I believe the national approach is correct. What is most important is taking a national strategic approach and use the same methodology. If a neighbouring council wishes to take a greater number of homes in their plan, then negotiate with them! Otherwise all councils should use the same methodology.

but be alert to new legislation for areas adjacent to National Parks to ensure they are not overloaded.

Grainger supports the principle of the Local Plan looking to meet the identified local housing need and directing development to the most sustainable and accessible locations. The use of the standard method is also supported, although it is noted that the actual housing policies contained within the emerging Local Plan would include a slightly lower level to account for parts of the District in the National Park (which is subject to separate local policies).

In 2017 the Government published a number of key documents relating to future housing need and growth within the UK. This was supported in September 2017 by the 'Right Homes in the Right Places' consultation, which included a new standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country. Following the consultation the calculation was accepted, and has become known as the standard method for housing need.

The National Planning Policy Framework (NPPF), revised in 2021 states: 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 unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. (Paragraph 61) And Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. (Paragraph 66)

The use of the standard method as the base-point for the housing requirement in the emerging Local Plan is welcomed, although it should be emphasised that this is a minimum housing figure, and uplifts to provide sufficient flexibility or to account for non-implementation or lapse rates of existing consents should be included.

The Planning Practice Guidance (PPG) clearly states that the standard method identifies a minimum annual housing need figure and that this differs from a housing requirement figure (Paragraph 002 ID Reference: 2a-002-20190220). The PPG continues by stating:

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact the future government policies, changing economic circumstances, or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method (Paragraph 010, Reference ID: 2a-010-20201216, emphasis added).

As a result, in response to Question POP1, Grainger feel that the standard method should be used for calculating the housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured, but that additional uplifts to provide flexibility and allow for non-implementation of sites should be considered.

There is an urgent need for new homes in East Hampshire. The Plan should seek as a first step to establish swiftly what that need figure is. Only then might it be demonstrated whether or not this need can be met. It is unacceptable that the Council prejudge at the outset that it cannot meet the requirement, especially since other authorities adjoining themselves suffer from very similar constraints.

The standardised methodology for calculating the Objectively Assessed Need (OAN) for every Local Planning Authority (LPA) in the country was proposed and established in 2017 mainly to make the process of establishing need swifter and allowing for greater certainty when preparing and examining local plans. The government remains absolutely clear that having up-to-date local plans in place is essential for the proper functioning of the planning system according to the law.

Paragraph 61 of the current National Planning Policy Framework states 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 unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

While the constraints and challenges in planning to meet development needs at any scale in the District have long been evident, we see very little that is exceptional about the circumstances that EHDC is faced with.

In terms of designations and physical constraints, including ecology and landscape, these apply to most of the South, South West, East Anglia, South Midlands, North West Yorkshire and the North East. When the policy constraint of statutory Green Belt is also considered then East Hampshire can be considered less constrained than many places. Furthermore Planning Practice Guidance (PPG) draws a very clear distinction between the standard method, which identifies a minimum annual housing need figure and the housing requirement figure that is separately derived following examination of a range of contextual factors including the needs of neighbouring authorities. (Paragraph 002 ID Reference: 2a-002-20190220). It says, The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact the future government policies, changing economic circumstances, or other factors might have on demographic behaviour.

Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method (Paragraph 010, Reference ID: 2a-010-20201216, emphasis added).

Accordingly, to be compliant with NPPF and PPG, the new Local Plan is not given latitude in which course to pursue. Stagecoach notes that the Housing and Employment Development Needs Assessment (HEDNA) (Iceni, May 2022) states it is not considered necessary for the Council to increase the Local Plan housing requirement above the standard method as a result of the affordable housing needs. However the HEDNA makes very plain that these needs are acute. East Hampshire's current affordability ratio (median house price to median workplace-based earnings) is within the top 35 authorities in the country (330 in total), and is the 13th highest authority outside of London. Overall the South East has seen the biggest increase in affordability ratios since 1997, an increase of 166.7% (Office for National Statistics), and the position of worsening affordability is likely to increase due to the current economic uncertainties. Thus the conclusion of the HEDNA that the SM requirement should not rise in response to this, is highly contestable.

However to seek to start the plan-making process again while seeking from the outset to provide less than this figure is manifestly not appropriate if the Council does not wish to create still further economic and social problems in the area.

Housing need is defined within the Governments Planning Policy Guidance (PPG) as the unconstrained assessment of the number of homes needed in an area, in other words a 'policy off' figure. The PPG makes it clear that housing need is separate from the assessment of housing land availability, and, importantly, the generation of a housing requirement figure (aka a 'policy on' figure). Unfortunately, this distinction is not well understood, and many respondents to this consultation will attempt to further the argument that the housing need should in some way be suppressed, due to a perception that an area is 'full up' or because they feel that local infrastructure provision has become stretched over recent years.

The starting point when determining the housing need in any plan area, is paragraph 61 of the National Planning Policy Framework (NPPF). This states 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 unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

The NPPF does not provide any guidance as to what might constitute exceptional circumstances in the context of determining the overall housing need, and the PPG sets out an expectation that the standard method is followed. The PPG does however provide examples of situations where it might be appropriate to diverge from the standard method to plan for a higher housing need figure. The PPG sets out the following circumstances where increases in housing need are likely to exceed past trends: growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; In East Hampshire, relevant neighbouring local authorities will include the South Downs National Park Authority, and Havant Borough Council. Both of these local authorities are unlikely to be able to meet their own housing needs, and will therefore rely on neighbouring authorities to assist them. No guidance is provided within the PPG on situations that might support plan making authorities using an alternative approach that generates a lower housing need to that resulting from the standard method. The PPG does state however that authorities will need to demonstrate, using 'robust evidence' that the figure is based on realistic assumptions of demographic growth and that there are exceptional circumstances that justify deviating from the standard method. It is clear that this establishes a very high bar for authorities wishing to deviate from the standard method.

East Hampshire District Council have engaged a firm of planning consultants, Icen Projects Ltd, to produce a Technical Note that seeks to test the Standard Method Housing Need for East Hampshire. The Technical Note recognises that East Hampshire District is split between the LPA and the part of the District that lies within the South Downs National Park (SDNP). As such, paragraph 2a-014 of the PPG is relevant, which states: "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 and the Broads Authority, where local authority boundaries have changed due to reorganisation within the last 5 years or local authority areas where the samples are too small, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels". It is interesting to note that the Icen Technical Note finds (on page 3) that the 2014 Sub-national population projection (SNPP) data shows future population growth that is too low based on past trends, meaning that the standard method would generate a housing need that is too low. This is likely to be caused by inward migration trends (which were based on the period to 2011) being underestimated. Page 11 of the Technical Note concludes that the population trends to 2020 are somewhat higher than that contained within the 2014 based data, and do point

to a likelihood that any future projections might be expected to show higher growth. It also notes that the 2021 based data will be available in 2023. No explanation is put forward by Iceni as to why inward migration to East Hampshire might be higher than expected during this period. It is likely however that the formation of the SDNP in 2010 might well be a factor, since the publicity around this might well serve to attract more people to the area than would otherwise have been the case, whilst at the same time limiting the overall supply of housing within the SDNP itself. Although it is difficult to find a direct correlation from the available data, it is noted that a number of authorities located near to the SDNP will have experienced a similar increase in inward migration.

The Iceni Technical Note also finds (p. 6) that East Hampshire has a high incidence of suppressed household formation, particularly within the 25-34 age group, and that this is likely a result of difficulties accessing the housing market due to cost. It is however noted that this would be corrected by the inclusion of the affordability uplift within the standard method. Overall however, and despite the above noted points regarding the underestimation of inward migration, the Iceni Technical Note concludes that there is no evidence that the data feeding into the standard method is substantially wrong, and that this should form the basis for assessing housing need.

The Government published a consultation on changes to the NPPF on 22 December 2022, and this includes a revision to the above-mentioned paragraph 61, which deals with housing need. This proposes that the standard method be advisory and a starting point for establishing a housing requirement for the area. This, together with the removal of the justified test of soundness, has resulted in a number of local authorities, notably Mole Valley and Horsham, halting the production of their emerging local plans pending the outcome of this consultation. However, it is not considered that the proposed text changes to paragraph 61 of the NPPF would result in a substantively different approach to housing need, since under the current arrangements local authorities are able to diverge from the standard method in exceptional circumstances. It is noted that the letter from the Housing Minister to EHDC on 25 November 2021 stated that the "standard method is only the starting point and does not provide a target. This was restated in the letter from Marcus Jones MP, Housing Minister in September 2022. It is therefore considered that retaining the figure generated by the standard method in East Hampshire would be a balanced approach and so that is the option that is supported.

POP1 How do you think we should proceed?

POP1a Please explain your answer

Explanations provided by those who selected 'Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement'.

South Downs National Park

It appears that the Levelling-Up & Regeneration Bill will now permit LPAs to reduce housing numbers (below the result derived from the standard method) if there are exceptional circumstances (such as constraints imposed by national parks). And the duty to co-operate is to be removed. The standard method may still be an appropriate basis of calculation across the entire district. But 27.5% of the calculated need should be assigned to the part of the district within the SDNP, to match the proportion of the district's population that lives in the SDNP area (this would mean 174 new homes p.a. in the SDNP, rather than c.115). This would spread development on an equitable basis for the entire district's population. Continuing underprovision of new housing for the population in the SDNP will only serve to increase house prices in the SDNP, exacerbating the affordability problem there and increasing the district's overall housing need in a self-reinforcing cycle.

Given that most of the District sits within South Downs National Park, there is a clear case for exploring exceptional circumstances given the environmental and geographical constraints of the District.

Housing needs in the areas outside the South Downs National Park is artificially inflated due to the unmet need from the SDNP. The fact that the SDNP is a national park means that it is not penalised for not taking its full compliment of housing based on need. That unmet need should not be passed on to areas outside the SDNP- it should just be taken as a general constraint on development in SDNP areas.

Th standard method is not appropriate when only 30% of the district can be built upon.

It is not clear whether other authorities with large national parks use different formulae. Perhaps this should be explained.

We need the National Park to take a fairer share, we are creating ribbon developments around the boundaries

57% of EH is in the SDNP. This skews housing to the extremities making it unfair and usually building the wrong houses in the wrong place. Making SDNP sacrosanct distorts the numbers and destroys villages and hamlets

43% of EH is outside the SDNP but is being expected to take 72% of new housing and that on top of considerable over development for the last 10 years.

It is grossly unfair that the SDNP has a much lover allocation of new housing despite it having the bigger landholding. There must be a fair and equitable distribution which they have not yet achieved.

As said the area is split into 4 areas with the SDNP as one which should be respected
A standard calculation may not be best for an area due to the specific requirements of that area. Also we share our area with the National Park and therefore seem to have a bigger proportion of growth
I think that more robust method(for EHDC), bearing in mind that the SDNP effectively splits the District into a north/south split of parishes should consider the north and south parishes discrete areas when applying the affordability ratio. I suspect there could well be two quite different outcomes.
Area has approx 60% SDNP and 40% outside SDNP. Expecting to fill the 40% with all the Gov housing number is wrong. Gove should reduce the numbers in the 40% area
One size of formula does not fit all. South Downs National Park has a massive impact on housing in this area.
We need more allocated houses in the national parks
SDNP average house price skews affordability checks outside of the park
Space not protected by NP status is going to be concreted over because of the ratio to protected land.
further consideration is needed as the SNNP do not appear to be getting their fair share and there are a number of communities in the park that are of lower landscape value and have more potential to development in line with the Authority's environmental/sustainability objectives (local development for local needs)
Consideration needs to be given as the SDNP do not appear to have their fair share –
Given the huge disparity between the SDNP and the more built up areas of East Hants, perhaps the 'standard' method will give skewed results and overestimate the need?
Whilst recognising the value of the SDNP, it seems peverse that an area which is a significant part of the district of East Hampshire, capturing it's main town of Petersfield as well as other key settlements, have limited growth. This could lead to the ossification of these towns and villages, with loss of pupils in schools and closure of these facilities. This doesn't make logical sense. If we are truly to plan for Climate Change, we should use this as the arbiter of where it is appropriate to plan - apropos the 20 minute neighbourhoods reflected elsewhere in the document. This would lead to a significantly more even distribution of housing across the footprint of the total area - between Local Plan and SDNP plans. Protection of landscape does not necessitate zero development, just careful, landscape led development delivering necessary homes for those in the area (p.s. as we know Mr Gove has indicated a review of housing 'targets' moving them from mandatory to discretionary - ergo it may be time to await the outcome of this)
We are an exceptional area and need our own method to account for the SDNP covering 57% of the District
The National Park boundary distorts the picture in East Hampshire and is effectively pushing development requirements onto a smaller part of East Hampshire. I cannot understand why Petersfield (which is a town with significant infrastructure and facilities not 'parkland') doesn't carry a level of expected housing growth which is comparable to other

large towns like Alton. If the standard model doesn't recognise the nature of Petersfield as a town because it's in the National Park, then a revised model should be used which acknowledges Petersfield's comparable large-town facilities and amenities and applies a similar housing requirement to it.

The sub-division of East Hampshire by the SDNP makes it unique in so far as housing need becomes significantly more restricted to those settlements outside the National Park. The fact that the settlements of Petersfield, Liss and Liphook (which are the most sustainable) will receive the lowest level of housing growth is an issue. A justification therefore exists to identify a local housing requirement for the remainder of the district that recognises both future housing need and over-delivery to date.

Meet local needs using a bottom up approach. SDNP needs to take their fair share of housing - without that EH has only around 30% of land area to build in which will destroy local communities outside the SDNP. The standard method calculation is in any case flawed.

The SDNP is unfairly affecting the proportion of housing being pushed onto the rest of the district. This needs to be re-evaluated.

There is a distortion in East Hants due to the protected nature of the south downs park. This provide excessive strain to this region, and should be compensated for

The National Park is unfairly distorting the picture

Because the trends in housing in 2014 are quite different to today. Also the infrastructure outside the national park is unable to cope at current levels, so with careful allocation it would be possible for more of the area within the national park to bear more of the new homes allocation.

The SDNP imposes an unusual aspect to EHDC housing as it overlaps into complementary issues such as transport and utilities provision which the formula doesn't take into account

National Park should have a more equitable share (larger)

It would appear to be wholly unfair to expect EHDC to find space for over 500 homes and the SDNPA to only have to find space for 115 homes, when the SDNP covers upwards of 60% of the districts and isn't even reaching the target of building just 100 homes a year. The SDNPA must cooperate more and take it's fair share of the housing number for the district as a whole.

I think the current stats are skewed and are not an accurate reflection of the true housing need. For years the SDNP have not met their true housing need and the rest of the district have had to pick up their housing quota, this must stop and be recalculated based on current poulation figures and seperate calculations for SDNP and the rest of the district

From the figures above it would appear than EHDC need to find space for 506 homes per year and SDNPA 115 homes per year. Why do you appear to be suggesting EHDC need to find 621 homes? The SDNPA MUST ensure they contribute fairly to the housing growth in the district, they do after all cover 60% of the district.

The allocation is distorted by the SDNP, placing more pressure on the LPA. This needs to be sorted out.

<p>Something has to be done about SDNP? It can't carry on blighting areas outside it by them being dumped on for extra houses. SDNP was never justifiable to the extent it exists. There is no justification for areas like Petersfield being within it.</p>
<p>I think our rural and national park characteristics warrant a more specific approach to housing growth assessment based on expected existing household organic growth</p>
<p>The situation with SNDP results in imbalance and is not sustainable. We cannot keep kicking this can down the road.</p>
<p>Alton is penalised by not being part of the National park. The National park needs to take a fairer share of new housing.</p>
<p>Does the target asked for by Govt take account of the special circumstances of East Hampshire- that a large area is SDNP and this is virtually exempt from large housing developments, MEANING THE EDHC AREA IS IN FACT TAKING MANY MORE HOUSES PER AREA THAN IS INTENDED OR SOME MIGHT SAY EVEN POSSIBLE to fit into the area and suitable sites.</p>
<p>That part of East Hants outside the South Downs National Park should not have to shoulder all new development for East Hants. There needs to be a more equitable distribution that maintains the character of that part of East Hants outside the National Park</p>
<p>The physical area of SDNPA and planning restrictions therein must surely mean that in reality, development will have to happen elsewhere in the LPA to meet central targets. This will be unfair on existing communities outside SDNPA?</p>
<p>We have a National Park within the area which reduces the number of houses which can be built. This puts an unfair burden on the other parishes. Most of the people moving to the souther parishes move out of Portsmouth, why is it the responsibility of EHDC to satisfy that movement.</p>
<p>Clearly the South Park National Plan doesn't work. Alton and the surrounding area has seen an unprecedented number of houses built in the past decade which has changed the town forever, for which many would say for the worst. Towns like Petersfield, Liphook, Greatham and others should be the focus for new housing now, not Alton.</p>
<p>The exceptional nature of Hampshire consisting mainly of a National Park needs to be taken into account</p>
<p>I do not believe the standard method of housing number calculation is correct. East Hants not SDNP (43% of area). SDNP area is only expected to take 18.5% of the total incorrectly calculated total. The proportion should be calculated based on population numbers. Also the duty to cooperate will need to be reviewed and removed so East Hants non SDNP does not have to take 82% of the total number. The resultant impact on the area of current proposed calculation is unacceptable.</p>
<p>You need to consider that there is a growing undercurrent of unfairness in the allocation of housing to NE, NW and South of EHDC whilst the SDNP doesn't take a fair share.</p>
<p>We need to stop shoe horning in more houses into Bordon, Alton, Fourmarks ect and look at fresh new developments with new infrastructure. Roads and services are clogged everywhere. And yet the elitist SDNP which is no more beautiful that many other areas of</p>

the countryside in the south remain immune to any development. There is disproportionately more development on a minority of the land outside of the SDNP. This needs to change.

You have to take into account the pressure on land / development already taken up for housing in the last (?) decade or so where housing targets for the district have been shoe horned into the area of East Hants outside the SDNP. Land and infrastructure/ facilities are already strained. You must (especially now Rishi Sunak has not gone ahead with mandated quotas) kick back on further pressure to take district targets and only apply them in large part to outside the SDNP. 57% of land in East Hants is inside the SDNP. 43% is not, so housing allocations should be about half of a similar district without the intrusion of a national park within its boundaries. You clearly state within this consultation you want to maintain the East Hants environment, landscapes, quality of life etc. If you carry on as you have done, then in the areas outside the SDNP, all of these factors will continue to decline - irreversibly.

Levelling-Up & Regeneration Bill

Hasn't the Government just agreed councils can have more leeway to depart from centrally-set planning targets?

Housing need now that the government has said that centrally-determined housing targets are flexible, the council should plan for enough houses to be built to meet demographic needs but no more, to avoid damaging the environment through over-development.

Since the government has advised that centrally-determined housing targets are now flexible the standard method for calculating need used by EHDC is both unnecessary and unfair on those already living in East Hants outside the NP. EHDC should instead plan for enough houses to be built to meet demographic needs but no more, to avoid damaging the environment through over-development.

The government has put changes to the NPPF out for consultation. If no change occurs, EHDC should use the standard number as the starting point for the LDP (a current NPPF provision much quoted by Mr Gove), but make appropriate reductions based on SDNP accounting for 57% of the land area (as Lewes DC have), and whose premium house prices inflate the district's average and hence affordability index uplift. If changes to the NPPF are made, they could have major impacts in how the EHDC standard method itself is calculated, further strengthen the method as only a starting point, and remove the need for a 5YHLS. Moving ahead to determine the required annual standard method number at this time would be premature.

The government has recently scrapped mandatory housing targets. EHDC should therefore take this opportunity to devise their own housing target, based on local need. I would like to see the target provide incentives for greener development, potentially by splitting the target into greenfield and brownfield sites, with the greater number of homes allocated to brownfield sites.

Explore other options/reduction in overall numbers particularly because 57% of EHDC area is within the SDNP, but which takes only about 18% of the total housing requirement. Michael Gove's letter of 5th December 2022 states when assessing a local plan, the following will have to be taken into account, Genuine constraints: local planning authorities will be able to plan for fewer houses if building is constrained by important factors such as national parks, heritage restrictions, and areas of high flood risk. So we must do it!

get the Gove response to amending house numbers with regards the 60/40 split with SDNP

The national park needs to take on responsibility for more new houses. The few areas outside the park cannot continue to take up all of the slack.

EHDC should consider the outcomes of the new housing bill currently before Parliament and rework their HEDNA housing numbers before proceeding further.

The direction of travel of Government planning policy is to move away from the 2014 projections and give more flexibility to districts to determine their housing numbers

This section seems to somewhat out of step with the latest government policy statements from Mr Gove. Overall, there is a clear case for adjusting the affordability calculations separately for the areas outside of the SDNP. The affordability calculation is predicated on a stack 'em high and sell 'em cheap model which may work for a supermarket but does not work for the far more complicated housing market. Housing in East Hants will continue to out of reach of people on the lower to median income band as long as there is inward migration of people from all over the region with higher levels of income. It's what happens.

This consultation is premature in view of the letter of 5 December 2022 from DLUHC to all MPs. The housing targets have always been the starting point for local plans and this letter indicated a move to "advisory" housing targets and allowing departures for exceptional circumstances. In addition, there are two major problems with the standard method that need to be reviewed. One is the fact that 57% of the District is in the national park and insufficient allowance has been made for this. Two, the Affordability Ratio substantially distorts the housing figure such that all of the new housing is planned to be provided for people outside the district. The figures in the HEDNA show a net inward migration of greater than 100%.

EHDC need to stop being a hypocrites. Councillor Millard preaches about fighting the government on housing numbers due to the unfairness of the SDNP. So now that the government has given EHDC the ability to stop additional housing we are still having to go through this consultation farce. STOP BUILDING IN ALTON.

The new government legislation should be adopted as it basically aligns with what our MP Damian Hinds and Councillor Millard have been arguing that EHDC's housing allocation is disproportionately unfair due to only 43% of the County be targeted for development. Other Councils have fought the Government on reduced housing numbers so should EHDC with the full backing of MP Hinds, in which case EHDC has already provided its full quota of housing with existing and current developments.

Due to new legislation and the amount of developments already being built the housing numbers for East Hants should be drastically lowered.

You do not appear to know the variables in the calculations. This is finger in the air reasoning. Those on the receiving end of unsustainable, unnecessary developments might display a different finger. The right houses in the right places! What affect might revised rules from Government have? Is this about raising Council income or delivering what people actually want as per the Vision?

Government figures are now advisory, not mandatory. Many new homes being delivered are being occupied by people from out of the area. Whilst there is a need for more

affordable homes for local people, overall housing growth should be guided by the ability of the District to absorb development without detriment to the environment or the quality of life for existing residents.

Some areas have taken more than their just quota during the current plan period. The hiatus of awaiting a new plan has opened an influx of appeals that were previously rejected. This has further increased excess development, particularly in communities just outside protected areas such as adjacent to SDNP. There are changes coming forward in parliament that may also alter circumstances.

The change in legislation from mandatory targets means that the calculations should be reviewed. The outlier location of the Horndean/ Rowland's Castle area separated from the rest of East Hants by the SDNP should be looked at in conjunction with the current Local Plan under consideration to prevent a conurbation of Horndean and Havant.

Infrastructure / environment

Too much development without an associated level of infrastructure development.

Bordon and Alton already take a large proportion of these new homes and those developments need time to settle in. Especially Bordon which has had several thousand homes delivered in the past decade. The town needs to have its community facilities like the health hub delivered

At present we are having more and more houses built with NO infrastructure in place, priority is needed for health facilities (doctors) and shops.

Too many houses already being built with no improvement to infrastructure, services or facilities such as healthcare, shopping etc

Exceptional circumstances exist already due to the increase in recent dwellings. The infrastructure cannot cope, more flooding everywhere, the roads are in a terrible state due to increase in traffic over the past few years.

The public transport and infrastructure is important. In Bordon, it seems now it is only housing being planned for.

Needs to be assessed based on the plan for the infrastructure to support any new housing.

Every area is different and should be considered on its merits and supporting infrastructure

In my area we need road improvements BEFORE more housing is allowed.

Live in Liphook. Existing roads not able to cope with traffic, even at current levels (esp when roadworks or wet weather - horrendous flooding and very narrow pavements). Need much much improved infrastructure, inc drainage and road links, before new housing should be considered

I believe brown belt areas should be developed first and if extra housing is going to be enforced in villages improvements should be included to existing provision for schools, doctors etc

I am concerned about the water supply in the district.
I cannot understand why Alton should have to receive thousands of more homes without any infrastructure ie Doctors or roads. It seems that EHDC do not care about Alton one bit as we are seen as a place to just build on. This needs to stop as the town is just not able to with stand huge amounts of houses without more shops and garages. .
It must reflect local circumstances, infrastructure and employment opportunities
We've had too much new housing locally for the level of infrastructure
U need to see the local road network, rail and bus capability. The A325 going they Wrecclesham is a nightmare and will only get worse the more u build in and around Bordon
Housing pressure for East Hants is NOT SUSTAINABLE it will trash our internationally and atio ally important SPAs/ SACs,, SSSIs, nature reserves, biodiversity which is already in crisis and historic landscapes basically everything that makes East Hants the special place it is. More house building here is actually a vote loser which is why the Govt had to reverse its highly controversial proposals to change the planning process. Biodiversity, Water, hospitals and certain roads are already reaching capacity. More and more houses in East Hampshire is just NOT sustainable and must be opposed so housing numbers are reduced and becomes more balanced.
Already we have too many new houses without any new provision in sports facilities, dentists, doctors, schools etc
We already have more new homes and population than local services and infrastructure can support
Whilst the numerical difference in the two methods is low we should take advantage of any process that minimiseis building on existing woodland
I support meeting the housing need based on household growth. I don't support the uplift based on the affordability ratio as building more private homes will not result in them being affordable to people in East Hampshire - it is likely to attract more people to move out of London and then commute back into London for work. This will increase transport carbon emissions. Any unnecessary housing built above the demographic needs of the District will cause damage to the environment
The standard method doesn't take other factors into account and puts areas under too much pressure to expand further when it is clearly inappropriate to do so. Limited school places, sewage treatment facilities and insufficient drainage are a few reasons why using such a standard approach can be unreliable and not enable to true reflection of an areas limitations for development. The standard method should be used in the first instance to explore the potential for demand and then in-depth research should be done to determine the suitability of an area to be able to cope with that demand.

Type of housing

<p>We don't need 'more of the same' if only really affordable housing is needed.</p>
<p>Exploring brownfield sites for housing is key to ensure food security leaving arable land in tact for future proofing sustainable food sources. Estates like red row on the outskirts of Alton should never have been pushed through near flood plains or a source of a river. Converting empty office spaces should be explored for affordable housing. Housing should explore Swedish style builds which are far more economic and greener to run instead of mass produced sites. Housing should be spread out into usable brownfield areas of which there are many.</p>
<p>There is a desperate need for high class downsizing housing to free up the many empty bedrooms in the area in the homes of the elderly</p>
<p>There are insufficient small low cost houses and flats so young buyers cannot afford to get on the housing ladder. Those that are smaller houses are often extended and removed from that category which are often in villages.</p>
<p>I believe housing requirements will have to be adjusted in light of the climate crisis. We can no longer expect to live in a detached home with its own garden. Housing should be being constructed in towns at a greater density and in medium-rise buildings with access to decent parkland. Green space needs to be protected to not only ensure food production for future generations but also to protect the natural world that remains and allow every other living thing in this county a chance to survive.</p>
<p>Exceptional changes are occurring in the financial markets that will affect mortgage rates, affordability and where people choose to live. What worked in the last decade won't work in the next 5-10 years because choice will change and more low cost housing will be needed. That must surely affect housing need</p>

Need for housing / local housing needs

<p>There is no population growth. We have no housing need. We have the oldest population of any district. All young people leave the area as there are no jobs.</p>
<p>we do not need more housing - we need more efficient use of existing stock e.g. making it easier for older people to downsize out of large, mostly empty family houses</p>
<p>I question the assumption that the building of lots of new (often 4 bedroom) private houses helps to meet local housing needs in particular those of young families and elderly people who are down-sizing. Nor does it address the affordability of housing (except very very marginally) . The average number of people per household is falling and the need for social housing seems to be increasing.</p>
<p>Living in Alton, it appears to us that we are being required to accommodate a disproportionate share of the allocation. Houses that are built should reflect the needs of people. not be dictated by what makes the most profit for developers. Houses should be built to last. Local community need to influence local housing, take developers out of planning stage, stop the 3, 4 and 5 golden goose houses that net higher profits</p>

At present housing seems to be placed where it can fill a space, not where it is required. As is being done in Four Marks and South Medstead.

Housing is a local concern that should meet local needs. There is no point building inappropriate housing in locations that are difficult to access for work and leisure. They also need to encourage an environment that people wish to live their lives in and not just use as a base to drive from. The architecture needs to be in keeping with the surroundings and build to a high standard as well as being affordable to a wide range of people. They also need to be a reasonable size so people can live a decent life and flexible to handle changing needs over time.

It seems to me that the new developments we are seeing built locally are not affordable, first time buyer homes, such as are needed to satisfy the household growth quoted above. Rather we are seeing larger family and executive homes with very little in the way of cheaper, starter homes. The result being that we are bringing new wealthier people into the area but not addressing the needs of the local population. While the government is reconsidering the system used to calculate housing targets and is likely to accept that they are targets and not mandatory, I feel we should be looking at ways to address the real needs of local people rather than allowing property developers to pay lip service to these needs while continuing to build higher profit homes for wealthier incomers.

Put the horse before the cart. Walk, scoot, ride community is the aim then are there sufficient jobs in the walk, scoot, ride area to justify building the houses? If there isn't, then the houses should be built where there are actually needed. We shouldn't be planning for people to travel to work. We see what has happening in London, by 2040 it will have swallowed up Alton at the rate it is 'growing'.

its important to consider the specific local needs and impact of the national park and surrounding villages

Area does not need developer driven planning decisions without due consideration to real needs and effect on existing population and infrastructure

PeCAN supports meeting the demographic housing needs of the district and policies to make housing more affordable. However, as explained below, we do not see how the over-construction of new private housing units would contribute to either of these goals. We therefore hope EHDC can use the recent government change of policy on housing targets to establish a housing target that meets the community's demographic needs without adding unnecessary construction that harms the environment.

The government recently U-turned on mandatory housing targets, after a rebellion by Conservative backbench MPs: Housing targets should be scrapped, because they are undermining local control over planning decisions and creating pressure for development, which is damaging to the local environment and to the quality of life of our constituents, said Teresa Villiers MP in the House of Commons, after tabling an amendment to the draft Levelling-up and Regeneration Bill (<https://bills.parliament.uk/bills/3155/stages/17044/amendments/10003228>).

The government responded on 5 December 2022, saying that "housing targets remain, but are a starting point with new flexibilities to reflect local circumstances" and the government would consult on how these can better take account of local density (see <https://www.gov.uk/government/news/communities-put-at-heart-of-planning-system-as-government-strengthens-levelling-up-and-regeneration-bill>).

We do not know yet how those flexibilities will operate. However, for East Hampshire we note that the overall housing need has been calculated at 632 new homes per year, of which only 381 reflect predicted demographic changes and 251 reflects an uplift for market signals, i.e. to over-build by 251 units a year in the hope that this will lower house prices in East Hampshire. The construction of 251 surplus homes would increase the housing stock in East Hants by a little under 0.5%. The OBR estimates that each 1% increase in housing stock reduces house prices by around the same percentage (Working Paper No. 6, July 2014, chart 3.2). Assuming this also applies in East Hampshire, reducing local house prices by less than 0.5% a year will not be any help for first time buyers who face an all-time high affordability ratio of 14.51x earnings (up from 5x in the 1990s).

Instead, we hope national policymakers will tackle the affordability crisis by promoting a better mix of tenures with more social and affordable housing, and by enacting mortgage reforms, which the OBR says are up to eight times more effective in reducing house prices than increasing the supply of new homes, among other things (for more on reforms that could improve housing affordability, see the report by Positive Money, 'Banking on Property', March 2022). We also note that the 2021 census shows that the average number of households in East Hampshire increased by 11.5% since 2011, faster than the 8.7% increase of population, while the average number of people per household fell from 2.45 in 2011 to 2.39 in 2021. Comparing the 2021 census data on households with the government's Live tables on dwelling stock (Table 100) shows that there was already a surplus of more than 2000 dwellings over households in East Hampshire in 2021. Taken together, these data suggest that if there is a barrier to household formation in East Hants, it is not caused by a lack of supply. An option that we would support for the Local Plan is therefore to adjust the target to meet the demographic need, i.e. 381 across the district, or 319 in the Local Plan Area.

Amount of housing

Too much over development already. Need to revise the figures downwards

There's too many houses being built on greenfield sites

Stop dumping all the housing on Four Marks and surrounding villages - thousands of extra houses and no new infrastructure.

We must always work to deliver the minimum no of new houses

This option has been chosen, because it is considered that the LPA should be doing everything in its power to maximise housing delivery. Either of the suggested housing delivery figures, of 632 or 621 per annum, is just too low. There is a pressing need in East Hants to deliver much more high-quality housing for private sale, especially that is suitable for first-time buyers, and shared equity / affordable homes to get families on lower incomes out of temporary accommodation, including hotels, B&Bs and HMOs and into good quality, permanent homes.

Affordability

This is a deprived area and house prices are unaffordable for many local people. Those from outside, with more money, can afford to buy here, forcing out our own children. Wages are very low in comparison to more affluent areas, yet house prices are comparable with those areas. How can this be right? The whole scheme seems to be based on how much profit the developers can make, not how our local community will be affected. The infrastructure of the area also needs drastic improvement.

huge unmet affordable housing need, unaffordable purchase prices

The area is rural and has a national park where some of the accommodation is not open to the local market fuelling the need for a more inclusive housing policy for affordable options either for council properties or rental or private

The difference in affordability ration and uplift between the two areas is significant. It seems logical to use the more detailed information.

Cutting short on housing numbers creates greater unaffordability. Market forces are a determining factor in the way housebuilders pay for the land and set their sale prices. If there's lots of competition, then this acts as a natural restraint to the rise in prices.

Accuracy / data / use of data

As communicated in Alton yesterday, the ONS are revising the population forecasts based on the 2021 census data as the forecasts done in 2014 were badly wrong. The 2021 census confirms our population growth is amongst the retired and not the working population. They have also confirmed we have a very high single occupancy of our houses over 7,000 most of whom have an elderly person at a late stage of life.

Your methods and standards methods are simply not working. If they did, we would not have a housing shortage.

The forecasts of 2014 (based on the 2011 Census) are no longer valid. We have the 2021 data and we have fundamental differences compared with the 2014 forecasts.

The standard method is based on 2014 data - already over 8 years old: we should be using latest data, including the results of the 2021 census, when published. The text suggests that the difference between 632 and 621 is not significant. But that equates to 1100 houses over a decade, and those are houses we could do without.

Use the latest population projections and recognise that over half of new houses will be for over 65, this has a big impact on the need for "market houses"

Only one alternative method has been looked at so far. EHDC should bench mark their position with other councils facing similar questions regarding National park areas within the council area.

We consider the use of 2014 data invalidates the calculation of accurate housing needs. We would prefer the use of a method tailored to the needs of East Hampshire, as bisected by the SDNP, rather than the 'one size fits all' standard method. We are concerned that until the Government finalises the future calculation and definition of housing needs, the question is somewhat academic.

Statistics don't take into consideration specific needs per area

The number of new houses should be reflected/determined by the the proportionate of population growing statistics

Government demands for additional house-building continue to place unacceptable pressure on the district's environment and resources. The calculation set out here is artificial and not demonstrably relevant to actual demand, so every effort should be made to arrive at a more realistic basis for calculation.

I just do not accept the government algorithm. We should look specifically at how this area exists today and what opportunities there are in the surrounding areas such as Portsmouth

The population of the UK has increased by a significant amount since 2014, alongside the loose fiscal policy that has boosted the demand for homes as investments. Affordability has also been impacted by covid with people relocating to the EHDC district from London as they can now work from home. Using the 2014 figure as a base starting point for the algorithm doesn't now reflect the true state of the demand for affordable homes in the EHDC district.

The uplift resulting from affordability numbers is not explained. I assume it results from the idea that building more homes should make them cheaper. However, I think experience shows that developers prefer to build high-value executive homes. Also, people move here in the knowledge that prices are higher because of the better surroundings.

It is unclear how numbers of new housing derived by whatever method will be applied to individual parishes. I live in Grayshott which has severe geographical boundaries to new significant housing development. The standard method therefore would not work when applied to Grayshott. Allocation of new housing will be of particular importance.

"The standard method affordability ratio is based on the median house price divided by the median income" This sentence shows that the evidence is already self-selecting. Only people who can afford to live here do live here, and therefore it will be forever thus. The high percentage of land within the SDNP relative to the rest of the area is undoubtedly prohibitive and restrictive of people trying to live in East Hampshire. Splitting the two areas into separate plans will only create division and force more housing outside of the SDNP. Until this anomaly is rectified, there will be poorly planned housing and a critical lack of infrastructure

I believe that you should indeed further explore the impact of the exceptional circumstances that certainly do exist in the Strategic Planning Authority Area (SPAA). There is surely no question as to whether these exist. These have been well publicised already.

They constitute the limited land availability for building outside the National Park. The SDNP takes up 57% of the land area of the SPAA leaving a nominal 43% outside it to build the majority of the housing numbers, but the actual land area available of that 43% is further reduced by protected heathland leaving only 30% available. This situation would seem to fulfil any definition of exceptional circumstances. The approach should surely be how to take account of these exceptional circumstances.

See these comments from Michael Gove MP in early December

* The Planning Inspectorate should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns ...and will give local communities a greater say in what is built in their neighbourhood. The SDNP is a local constraint and c5000 petitioners have expressed their concerns. For example, when assessing a local plan, the following will have to be taken into account: * Genuine constraints: local planning authorities will be able to plan for fewer houses if building is constrained by important factors such as national parks, heritage restrictions, and areas of high flood risk. Our LPA is constrained in the availability of land for building by the existence of the SDNP within its boundaries 57% of it. And the remaining land for building amounts to 30% of the total land area. These are genuine constraints. The answer could be separate assessments for the SDNP/LPA - Damian Hinds has consistently spoken about separate housing assessments for the SDNP and the LPA.

I don't believe the Standard Method is fit for purpose hence answering yes to the second option for Pop 1. The reason for believing this is: It is considered that the HEDNA housing split is fatally flawed and based on unsound methodology and a suggested revised methodology is below. The 2022 HEDNA gives us a 632p.a. housing need split between 115 (SDNP) and 517 (LPA). The way the split is calculated is considered to be fatally flawed and use unsound methodology because it projects future housing need in both areas by extrapolating the household growth seen in 2011-2020. This growth merely reflects the building of houses so is a function of planning approvals and nothing else. So as a measure of actual growth it is artificial. Not only that but in the years 2011 - 2020 the SDNP was explicitly not building to meet its own housing need in the district, and the shortfall was being picked up by the LPA. So, the growth figures for the LPA are artificially skewed by the inclusion of the SDNPs unmet house building needs, and the growth figures for the SDNP are not a true reflection of SDNP need because they weren't meeting their need. A fair share split of the 632 p.a. between the SDNP and LPA would be on a straightforward population ratio basis: 174 p.a. (27.5%) in the SDNP and 458 p.a. (72.5%) in the LPA. The rationale for this is that the entire district is a single Housing Market Area (as acknowledged on page 2 the 2022 HEDNA) and so the true housing need must be spread broadly evenly across the SDNP and LPA areas.

Other comments

I need to understand the calculations on this page. Do they suggest that the split between the 2 areas in the district (i.e. inside and outside the National Park) produces targets that are in fact in accordance with housing need projections?

Should be reviewed periodically

Standard method is not always the correct one but easy to accept

True There is little difference between 632 and 621 houses but there is a significant difference between 632 and 506 houses. It is not clear from this which one EHDC are saying will need to be delivered.

Financial and global influences

One size fits all Never works

Things are changing all the time this option would enable change as and when housing needs change

Have to be flexible to need

Exceptional circumstances DO exist for LIPHOOK but the Parish Council Chair refuses to acknowledge them and supports EVERYTHING SDNP say which is 99% against what the community is asking for. You must look at exceptional circumstances.

It is vital that we keep the villages that we have as 'villages' as part of the rural character of the environment. This means that they need to be protected from unnecessary development just because there might be land available. I therefore think that further exceptional circumstances should be sometimes explored.

Previous 'standard' calculations may be overtaken by unforeseen changes. Continuing examination and possible revision of plans is vital

Methodologies exist to meet the majority of needs. In this case the methodology would apply to a larger built up area but the baseline of EHDC Communities is not the same as this and therefore such methodologies cannot be applied across the piece assuming e.g. Froyle is the same as Petersfield and definitely not Winchester or Southampton

POP1 How do you think we should proceed?

POP1a Please explain your answer

Explanations provided by those who did not select an answer but provided an explanation.

Unclear

I find the presentation of these figures confusing - what does it actually mean in terms of numbers of (affordable) units and where they might be built? Tricky to ask people to comment on things which are not explained clearly...

I don't understand this well enough to select an answer. But all housing developments should include homes for all types of families.

Impossible to determine in the present circumstances.

Infrastructure

We don't need anymore housing in Bordon, we've got too many and no infrastructure to support it!!!

Alton seems to have a disproportionate amount of house building probably because Alton was excluded from the SDNP. However, the housing stock and population is rising but without a corresponding increase in infrastructure especially primary care.

None of your housing developments take into account traffic. You seem to pretend people wont drive. You need to ensure that these developments have adequate parking and that local villages impacted by them are adequately bypassed.

The uplift on numbers of housing 'needed' due to affordability ratio does not take account of the increased pressure on infrastructure due to even more housing. Nor does it recognise the way in which increase in density of housing affects the character of our mainly rural settlements. The alternatives put forward need more context and the choice would vary across East Hampshire Planning authority.

South Downs National Park

Exceptional circumstances DO exist for LIPHOOK but the Parish Council Chair refuses to acknowledge them and supports EVERYTHING SDNP say which is 99% against what the community is asking for. You must look at exceptional circumstances.

The area outside the National Park is overburdened with new housing - especially Alton!

Why should an area of beauty be protected when the areas surrounding it are being choked by over expansion and lack of infrastructure. A targeted built new town/village would link the areas and release pressure on over populated under resourced areas

Other comments

The higher estimate of 632 dwellings being the later estimate should be used. The other figure is based on information over eight years old.

(specified both) Gives flexibility to the local plan.

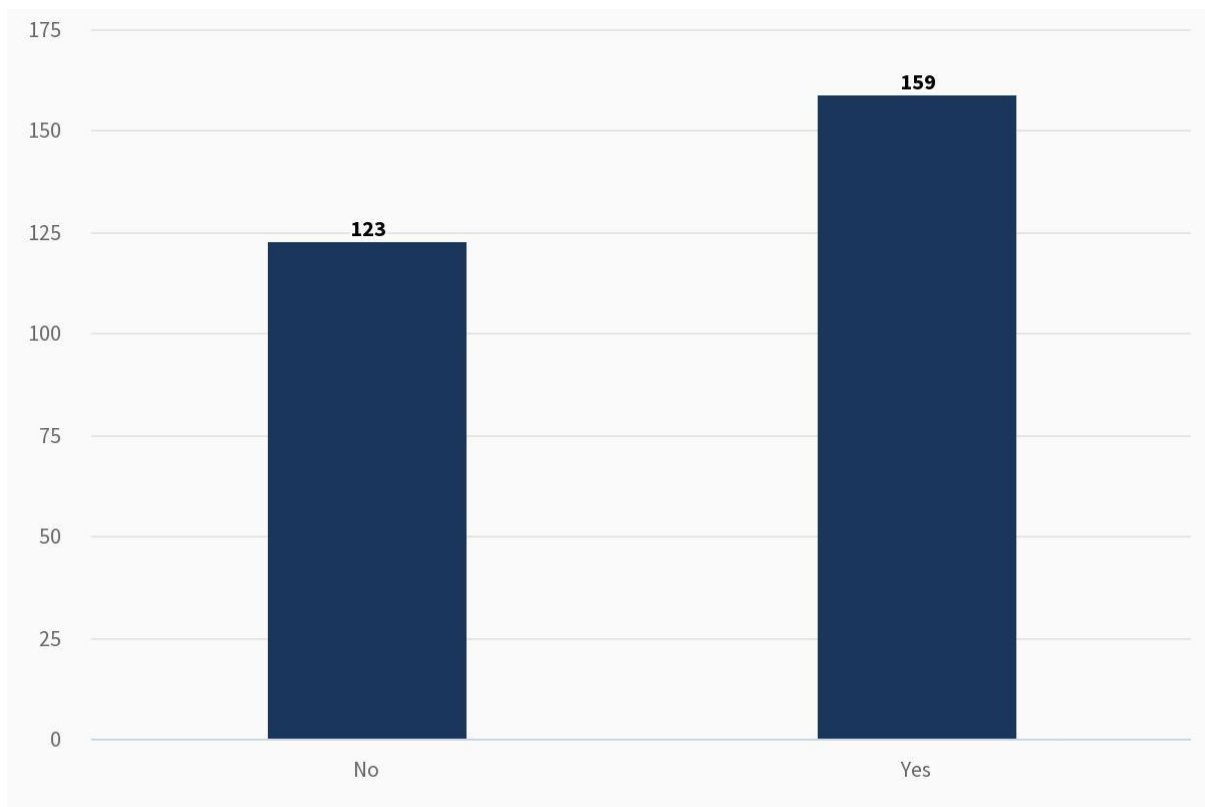
It would appear that there is little point in spending more money on this and accepting the standard method is the better option.

Factors change the plan needs to be dynamic and allowed to be constrained or restrained based on what if scenarios

This area has some important ecological sites which need protecting from increasing population.

No evidence for change.

POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? (Y/N)



123 respondents (44%) answered no, and 159 respondents (66%) answered yes.

POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? (Y/N)

POP2a Please explain your answer

Explanations provided by those who answered 'Yes'.

South Downs National Park

The latest housing projections suggest SDNP should provide 115 dpa, although the Reg.18 Plan suggests SDNP are likely to maintain the 100dpa commitment. As a result, the overall shortfall will only increase, further impacting on affordability and supply within SDNP and beyond. EHDC should therefore take the additional 15 dpa, giving a total housing figure of 532 dpa.
SDNP being protected
It is grossly unfair that the SDNP has a much lower allocation of new housing despite it having the bigger landholding. There must be a fair and equitable distribution which they have not yet achieved.
A large part of the district is effectively taken out of the equation by being part of the National Park.
housing numbers should reflect the 60/40 % areas. Gov to agree this anomaly
It's far too high for just 43% if East Hants to accommodate. Make the national park take a fairer share.
Only about 40% of the area should not have to supply 100% of the Gov figure
Some fringe areas of the SDNP are better suited for development than adjacent areas outside the Park. Re-allocation of numbers to SDNP should be made with this in mind
Yes because the need is not sustainable with the area available for development outside the protected South Downs park and protected environments / character areas
Distorted figures due to South Down national park protection status
How many times does it have to be said. Why does Alton have to keep accommodating the housing numbers that the SDNP will not
It would appear to be wholly unfair to expect EHDC to find space for over 500 homes and the SDNPA to only have to find space for 115 homes, when the SDNP covers upwards of 60% of the districts and isn't even reaching the target of building just 100 homes a year. The SDNPA must cooperate more and take it's fair share of the housing number for the district as a whole.
Certain areas of the district are already being over developed due to the existence of the SDNP. Much more cooperation from the SDNPA needs to be obtained to ensure that any

new homes are spread evenly around the district in the most appropriate and sustainable locations.
I already explained under POP1 my reasons not to accept the 517 homes per year and the erroneous apportionment between SDNP and the rest of East Hants.
The distribution is weighted towards the LPA. Either the SDNP takes more housing or a more representative need is calculated for the land area of the LPA.
SDNP should be taken into consideration. Too many houses being built in East Hants which is changing the character of the area.
New Government legislation needs to be adopted. The fact the SDNP makes up 57% of the county makes the current housing allocation numbers a joke and completely illogical. It what universe does it seem fair that an area less than half the size of the whole county has to take the full quota. It is utterly senseless. Where there is a solid basis to adopt lower housing numbers the council should maximise their efforts in obtaining government approval.
I gave my answer in the previous question, but to repeat: the allocation is based on the whole district where as 57% is within the SDNP. Thus this quote will continue to look to shoehorn 100% the housing in 43% of the land space. If the district figure is 517 new houses per year, then the target for land outside of the SDNP to account for that substantial exception is c. 222 homes (43% of 517)
Its not sustainable!see previous comments. What baseline studies have been conducted to show that an extra 10,000 homes can be put in East Hants even with existing permissions removed that still falls in the areas OUTSIDE the NATIONAL PARK who will not even allow sensible development around the existing town of Petersfield!
AS for my answer to Pop 1A. If the SDNPA believes that only 115 homes are needed each year to meet local requirements, why s the LP area needing so many more?
More houses need to be built within the SDNPA to take a fairer allocation of housing for the area.
Because these will all have to be built in that part of East Hants that lies outside the National Park
It is profoundly undemocratic to shoe-horn East Hampshire's entire housing "need" into parts of East Hampshire that lie outside SDNP. There are many other compounding problems with the apparent need for new houses, including: allowing developers to build only the types of houses that generate maximum profit for the developer, ignoring many opportunities to convert large commercial and retail buildings into housing. Central government policies which encourage greater use of large properties which are (under-)occupied by older residents, and to restrict the growth of second home ownership.
EH need 319, therefore we are importing nearly 200 WHY? 2. The SDNP covers 57% of EH. Why cram 517 into 43% of the land , bad planning 3. New NPPF rules will help reduce numbers for sensible planning 4 Affordability ratio uplifts numbers artificially due to flawed calculation. The numbers are inflated clearly
As previously stated the balance of NP protected land to non protected land.

The number is too high for a rural area adjoining the national parks. Protecting the rural landscape and enhancing biodiversity are very important and would be compromised by this high number

We don't have the land - South Downs is most of the area and it can't be built on, so you can't dump 100% of the requirement in 40% of the area.

Yes - The SDNP is taking up the majority of the land for these houses to be built in

As set out within the Housing and Employment Development Needs Assessment (HEDNA) prepared by Icen in May 2022, the housing need for East Hampshire generated by the standard method (including the part of the District falling in the SDNP) is 632. As discussed above, this is considered to be a conservative estimate of need, but which is overall and on balance supported by available evidence. Historically, EHDC and SDNPA have agreed a Statement of Common Ground (SoCG) that agrees that the SDNP should deliver 100 homes per annum within the boundaries of East Hampshire. However, the HEDNA now proposes a different approach, based on whether a different standard method figure exists for each area. This includes an assessment of population growth in and outside of the SDNP boundaries and concludes that growth outside of the SDNP has been slightly stronger. Given the constraints to housing delivery in the SDNP that is perhaps not surprising. It is also clear that the National Park has a much higher median house price (£500,000) than the rest of the District (£385,000), but that average household incomes in the two areas are more or less consistent (less than £1,000 difference). Applying this approach gives a need for the SDNP part of East Hants of 115 homes per year, and 506 in the rest of the District. However, this approach seeks to treat the SDNP as any other planning authority when in fact there are very real additional constraints to development within the boundaries of the Park. The HEDNA also assumes that past trends of housing development within the National Park, linked to the South Downs Local Plan adopted in 2019 and a number of related neighbourhood plans, will continue to endure on a similar trajectory. There is however limited evidence to support this assessment and whether sufficient land exists within the national park boundaries to support 115 homes per year without that leading to substantial harm to protected landscapes, or indeed what the mechanisms might be to secure that delivery. Given the very highly constrained nature of the National Park, it is therefore suggested that further assessment is carried out to better understand the capacity for additional development within that part of East Hampshire District. Failing any ability to do that, it is suggested that it would therefore be appropriate to assume zero housing delivery within the National Park during the plan period with the result that the rest of the District (i.e. that covered by the emerging East Hants Local Plan) plan for the full standard method derived figure of 632 dwellings per year.

Belpert suggest that, as a minimum, the figure should be increased to 532 dwellings per annum to include the unmet need of from SDNPA (15 dwellings per annum). Whilst this is only a small increase, it is important that the Council is clear about this now as it demonstrates compliance with the Duty-to-cooperate. Before the housing requirement is fixed it is also recommended that the Council continue to explore if any other neighbouring authorities have unmet needs which they are unable to accommodate. It is noted that this can be a difficult and prolonged discussion to agree unmet needs in neighbouring authorities. In the absence of robust understanding of unmet needs the Council could explore if a notional higher housing requirement can be accommodated in the district. Other authorities have assessed an additional 20% (which comprise an additional 106 dwellings, taking the requirement to 638 dwelling), so this could be a reasonable starting point. This high requirement could be included as a reasonable alternative in the Sustainability Appraisal.

Infrastructure

Only if the appropriate infrastructure is in place. Local infrastructure must keep up with number of houses built.
Infrastructure should be in place before anymore houses
we are over populated already with no significant infrastructure to support the current population of Bordon and Whitehill
As I already explained, this high figure cannot be sustained by the existing infrastructure. Our environment will become overwhelmed, roads gridlocked and unusable. I do not believe these housing need figures. The developers have become the tail wagging the dog.
It seems a arbitrary way to decide how many houses need building. To just say a certain number of houses need building without planning for transport and infrastructure seems flawed.
The infrastructure does not support this
Insufficient infrastructure when new homes are build - promised by rarely delivered
There isn't the infrastructure to support the volume of new residents into the area. Services are already stretched beyond capacity. The infrastructure to support needs to be taken into account at the same time. They need to happen in tandem.
EHDC has very restricted local Road network which is not suitable for major expansion. The Alton and Four Marks/south Medstead area has expanded considerably since we moved to Medstead in 2015. Continuing development is still being proposed, but there is no development in the roads. The local lanes (other than the A31 are not suitable for this level of development.
When building all these new homes the builders should be made to uprate all the services(sewage ect) so we don't end up with raw sewage coming up through the drains like a lot of other places.
Only if the appropriate infrastructure is in place. Local infrastructure must keep up with number of houses built.
I really don't think any more housing is needed in the area until, g.p/ dental/ schools, town centre is sorted out and then look back into housing.
Too many already, loosing our green space, no infrastructure to support more housing!!!
Alton has had more than it's fair share of house building. The corresponding population increase has outgrown supporting infrastructure.
Infrastructure water, sewage, power, Dr's, dentist, schools, shops
Lack of infrastructure Schools, new roads, GP surgeries hospitals etc
Who will occupy these new homes? Will they be sited where the infrastructure is capable of servicing their needs?

I am concerned about the water supply in the district
Unless proper targeted infrastructure covering health services then building more homes is foolish as an aging population will need health services, transport etc. But so will the young generations without adequate education we fail to provide a good education for our future generations
It is not sustainable with the same 'target' areas routinely reapproached to support more, having already supported too much, particularly when there is no adjustment to infrastructure to support.
Clearly East Hampshire is an area that cannot cope with such horrifying numbers of houses. There is not the infrastructure in place to fulfil the housing needs. If there were more roads, trains, buses, hospitals, healthcare provision, schools and other amenities then perhaps we could have more houses, but the area just can't cope.
The infrastructure around Alton has not kept pace with the housebuilding. Why has Bentley not had any new housing?
Lack of infrastructure. Lack of affordability for local people.
The area is already over populated and the infrastructure hasn't kept up with the new builds. The roads, schools, GPs and utilities are already at breaking point
We are already over populated and the infrastructure isn't keeping up with the increase
There are insufficient infrastructure and support to support the additional house types being built.
Too many new houses have been built without enough provision for sports facilities, doctors, dentists, parking etc
Infrastructure and lack of services are at breaking point. Roads are clogged and public services including transport is utterly poor around Bordon. The area is becoming overdeveloped and the environment/ecology are being destroyed. Please stop over development of Whitehill and Bordon now. Please listen to the residents for once.

Type of housing / approach

It is also about the types of homes - developers want to build bigger houses. But in fact the requirement is for smaller homes - as evidenced by the number of adults living with their parents.
It doesn't consider current infrastructure or the type of housing needed. It is no good building 517 four bedroom houses or 517 retirement apartments if what is needed is 1 or 2 bedroom homes for single occupants or young families.
It is types of housing not quantity.. Build more houses (bungalows) for older people
I think we need to await the Government's decision on housing needs and housing targets. Whilst we do need more homes, there should be a greater emphasis on improving the large quantity of homes we already have, rather than 'ripping down' and renewing (which is not environmentally friendly). Where are the 'retro fit' schemes? The Council

could also prioritise through the local plan intensification of use of the existing homes? Since the last local plan was agreed, many homes have been increased in size, however, as the census data will tell you, the household size has NOT increased. What this tells you is that many of the existing homes are massively under utilised. Rather than building more homes, there should be a real 'push' to increase the utilisation of the existing stock, whether by development management policies (requiring homes of a certain size to be split into two homes) or via partnership work with Social Landlords (buying up homes and splitting into two, three or sometimes four homes). This would be far more environmentally friendly, would reduce the impact on landscape whilst delivering the new homes required.

Reuse heat we have already built and also turn empty office/shop space into housing

The actual number of dwellings built will be determined by the housing developers who will build houses that provide the highest commercial return. The number of houses required must have greater granularity to reflect the demographic and employment needs of the area. Land made available for developments should be designated to the type of housing needed in that area and developers forced to construct houses of this type. It must be determined how many of the 'new homes' are flats, starter homes, small family homes and larger family homes. Affordability is key here to ensure that the right houses are built in the right locations

Greater need of housing especially affordable housing

first - it should probably be more, second there must be a proper provision of genuinely affordable homes, third the park should take a more equitable share of the burden

To arbitrarily decide a housing number per year is wrong. Would it not be better to look at discrete areas and assess the housing potential of each and then aggregate into a total. This may or may not be more or less than the 517 but would have local support and buy in.

Needs should be assessed as required when stocks are suitably depleted, not a set annual figure. There are a lot of developments still unfinished which may already meet the numbers required, therefore no further new developments should be needed at this time

As explained above, in answer to POP1a, it is considered that 517 dwellings per annum is a very low figure. There is a pressing need to deliver more housing, including more starter homes for first-time buyers, more self-builds and more affordable dwellings of all types and tenures. The LPA needs to look at ways of increasing housing delivery. It needs to grant more planning permissions, more quickly and it needs to allocate more sites for housing in the short, medium and longer term. Only through the LPA being proactive will the ridiculously high multiplier of 14.51 average earnings be reduced to something more affordable, so that younger and less affluent people can be adequately catered for by the local housing market. The local housing market in East Hants prices out younger and less affluent people, the very people who will not be aware of this plan and will not submit representations. The LPA needs to take action to cater for their needs and not just to respond to the older, more comfortably off residents, who make more noise and therefore, by default, have more say in the local plan process.

Affordability

The affordability ratio within the District is high at 14.51, and as is noted in later sections, there is a high need for more affordable housing and the Council's own analysis shows a total need for 613 new affordable homes across the District per year, which equates to 97% of the standard method local housing need figure of 632. The suggested housing target of 517 homes per year will only exacerbate the affordability issues within the District and the Council should seek to increase the minimum target to ensure additional affordable homes are delivered. Sufficient market homes will aid the delivery of new affordable homes.

housing needs doc identifies massive under supply of affordable housing and unaffordable price/income ratios. This 517 figure would be knowingly accepting that the LP life will fail to address this

Local needs

Southern parishes have taken significant housing numbers over the years and a more local housing needs assessment is needed to reflect this past delivery.

Housing should be based on local needs not on Government targets

Accuracy / data / use of data / calculations

As explained above, this is an arbitrary calculation with no real relationship to actual housing need

Formulae are like 'averages', circumstances do not usually conform to need. We cannot agree until the local requirement is assessed and proved with the appropriate local housing need taken into account.

See answers to POP1a. According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. M&FM NP Steering Group believe that that is an unjustifiable burden on the local residents. The affordability index is a flawed calculation only adding more and more higher priced dwellings and making them even further out of reach local residents as the affordability index climbs even higher. the data suggests the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone up by over 30%

The changes being enacted by Michael Gove through the National Planning Policy Framework process gives EHDC the flexibility to build only the number /type of house we actually need to serve our demographic.
The targets can be reduced in various ways: Reduction method 1: Revisit the use of 2014-based household projections, I believe it's possible to interpret published Government/EHDC data to show that the predicted new housing demand from population change within the Local Plan area is 319. The balance is sometimes thought be a tool to contain house price growth. I propose EHDC should clarify any overbuild values and remove them from the target

Reduction method 2: Affordability Index impact (median workplace-based affordability ratio). I believe the data used contained anomalies due to the timescales and data points used (ie after the pandemic resulted in high house price inflation), whereas now house prices are falling and significant pay rises likely in response to high inflation, it may overstate the affordability in the next decade. Reduction method 3: Relax Impact of National Park Restrictions Using the flexibility of the new Regulations to take into account the special circumstances of the National Park, will reduce the number of new dwellings EHDC should feel obliged to build in the Local Plan area. Given that the National Park covers 57% of the district and the remainder is force to carry an excessive burden, then using EHDC figures it is possible to unwind the extra burden and generate a figure of between 305 and 320 new build per year for the Local Plan area. EHDC should also take into account the excess historical house building in the Four Marks village and further reduce the target for this area.

The affordability ratio needs to be adjusted, currently it is causing housing numbers that are far too high. It seems to drive the building of larger houses that are more expensive so that more houses are required. .

There are strong reasons not to use the housing need figure as the 2014 population projections are outdated.

I would question the demand and also the supply - not confident that the "existing supply" is a true figure based on the number of houses coming onto the market. Need to tackle the sandbagging being done by land owners and builders.

It should also be considered how many new homes have already been successfully provided in previous years - if EHDC has a good record and other districts failed to meet their requirements EHDC should not have to bare an unfair burden

The government figures based on the existing algorithm don't reflect the population increase or the demand for affordable housing in East Hampshire, and the demographic shift to home working due to covid..

Based on erroneous population projections. These will be updated later this year.

This figure includes a "market signals uplift" which needs to be challenged and reviewed (i.e. the methodology for its calculation and underlying assumptions.). The CPRE argues that there are significant numbers of empty properties across East Hampshire .

the standard approach does not take into account local needs. Any survey on housing needs should also determine how many homes in an area are vacant for whatever reason rather than just assume that continuing to build a set number is what is actually required.

The system is flawed. It is not an accurate representation of the housing needed. It does not take into account the extortionate prices of these potential development properties (which are not affordable). The SDNP (which takes up a very large area of East Hampshire) has an unfair influence over the distribution of housing targets given to the remainder of the district.

Don't agree with the affordability calculations

The government has recently given more flexibility to local councils to truly target the true housing need in East Hampshire . th true housing need would be 319 new homes per year

by removing the flawed uplift calculations . We have a very skewed affordability ration in our district due to the expensive housing in the SDNP area
The central objective of the Standard Method is to address the housing crisis and make house prices more affordable. But if it doesn't reflect affordable housing need and economic growth.
SDNP will probably under deliver again in its housing quota. So maybe modelling should be done to cover that.
The method of calculating growth does not take account of local need but is using nationally derived averages
Most of the population growth in our area is a result of the elderly getting older and closer to death. These numbers will be revised dramatically by the ONS.
use the latest population projections and recognise that a very significant element in housing will be for over 65. This means that simplistic numbers will not meet actual need.
lack of foresight in underpinning building programmes with proper provision of infrastructure, and plans that are based on data sets from 2014 are , in my opinion, invalidated by the impact of BREXIT on immigration and a shrinking population
The methodology used to identify the Local Housing Need figure disaggregates the application of the affordability ratio to separated projections for EHDC and the National Park. The South Downs National Park Authority is not under the same policy obligation to meet its objectively assessed need as the District. The Council should model additional for affordable housing to meet the remaining latent shortfall.
Impossible to know with the current level of immigration
The population figures with uncontrolled immigration at present make it impossible to determine
You need to take into account support infrastructure challenges imposed by the SDNP and also the housing need must reflect demographic factors such as ageing population / rental needs and should therefore factor in care home provision and affordable/rental housingore reflect
This is too blunt a formula and does not take into account national park and maintaining the diversity of local villages
I am repeating my answer to Pop 1 here as the basis of the calculation is considered to be flawed. It is considered that the HEDNA housing split is fatally flawed and based on unsound methodology and a suggested revised methodology is below. The 2022 HEDNA gives us a 632p.a. housing need split between 115 (SDNP) and 517 (LPA). The way the split is calculated is considered to be fatally flawed and use unsound methodology because it projects future housing need in both areas by extrapolating the household growth seen in 2011-2020. This growth merely reflects the building of houses so is a function of planning approvals and nothing else. So as a measure of actual growth it is artificial. Not only that but in the years 2011 2020 the SDNP was explicitly not building to meet its own housing need in the district, and the shortfall was being picked up by the LPA. So, the growth figures for the LPA are artificially skewed by the inclusion of the SDNPs unmet house building needs, and the growth figures for the SDNP are not a true

reflection of SDNP need because they weren't meeting their need. A fair share split of the 632 p.a. between the SDNP and LPA would be on a straightforward population ratio basis: 174 p.a. (27.5%) in the SDNP and 458 p.a. (72.5%) in the LPA. The rationale for this is that the entire district is a single Housing Market Area (as acknowledged on page 2 the 2022 HEDNA) and so the true housing need must be spread broadly evenly across the SDNP and LPA areas.

As in the previous question, the constraint of the SDNP should be factored in to reduce numbers. Also, the affordability ratio that is used in the standard method to calculate the number of houses needed should be adjusted as it produces ratios that are artificially high resulting in inflated figures for the number of houses needed. It currently uses a single persons income of £28,603 and median house price of £415,000 in EH. I believe it should take into account 1. That a significant proportion of new households will be couples and therefore household (not just an individuals) income should be included, as some proportion of the final income figure used in the calculation. 2. The medium house price (currently £415,000) should be an average of the combined price of 1,2, & 3-bedroom properties only, as they are what most new households will buy, (not the 4+ bedroom properties). By including the 4+ bedroom dwellings, it encourages developers to build more large house, which results in the affordability ratio going up even more, so you have to build even more houses. Additionally, we know from the future demographics of the district (see the HEDNA 2022), it is 1,2 and 3-bedroom properties that are needed.

These need to align to future projections and recognised the significance of an ageing population and more affordable housing in rural areas for younger families etc that want to return to rural areas to help look after ageing relatives.

As I have said in my previous response I feel what we need to do is to provide for genuine household growth i.e. 319 per year rather than the inflated figure that will result in the building of extra homes that are not needed by local people but simply draw in more, wealthier people and keep the house prices higher than they need to be.

PeCAN thinks the government's new flexibility around housing targets should be used to reduce this number from 517 to 319 by removing the ~market signals uplift in full (see answer above). If the uplift must be retained to some degree (which we hope it wont), then it should be based on different, perhaps more up to date, data to avoid locking in a historically high affordability ratio for the duration of the plan. The affordability uplift used is 166%, based on ONS 2022 median affordability ratio of 14.51 which itself is based on data u to September 2021. This data point is after the pandemic pushed house prices up but before the increase in interest rates started to push prices down. House prices nationally are now falling: Nationwide reported in December 2022 that house price growth had fallen for four months in a row and predicted a further 5% fall in 2023. In addition, inflation is likely to increase wages in future, which would tend to reduce the affordability ratio, meaning that the 14.51 affordability ratio from September 2021 could overstate affordability over the next ten years. Updating the data even by a few months would reduce the target by a meaningful amount. For example, using a median house price of £470,715 (East Hants, Aug 2022, Land Registry, Alton Herald) and average earnings of £35,914 (East Hants, FY 2021, ONS ASHE Tables 9 and 10), gives an affordability ratio of 13.10, which reduces the adjustment factor from 166% to 156% and the overall target from 632 to 598. Alternatively, using a pre-pandemic (2020) affordability ratio of 12.31 would reduce the overall target from 632 to 579, before splitting between the Local Plan Area and SDNP. That said, we feel that a sensible approach in light of the new flexibilities would be to base the housing target on actual predicted demographic need, i.e. the 381 homes per year needed to satisfy predicted growth in households from 2022 to 2032, of which 319 would be needed in the Local Plan Area and the remainder in the SDNP. Any

numerical reductions that can be achieved would reduce the environmental and climate costs associated with building new homes for which no demographic need or benefit has been demonstrated, while ensuring that enough new homes are built to meet demographic needs in the district.

It appears that the Levelling-Up & Regeneration Bill will now permit LPAs to reduce housing numbers (below the result derived from the standard method) if there are exceptional circumstances. And the duty to co-operate is to be removed. Even if the standard method were to be used in respect of the entire district (632 new homes p.a.), we believe that the assignment of 517 new homes p.a. to the LPA is the result of a flawed calculation, as follows. In the 2022 HEDNA, the consultants attempt to split of the district-wide 632 new homes p.a. between the LPA and the SDNP. When calculating the household growth figure in each sub-area, the consultants assumed that the future population growth rate in the LPA will be double the growth rate in the SDNP (paragraphs 5.44 and 5.45). This is based on the relative population growth rates observed in the period 2011-2020. But for most of that period (certainly since the MOU signed between EHDC and SDNPA in 2015) the LPA area was explicitly building extra houses to meet a significant proportion of the SDNPs housing need, which in turn must have been a significant contributing factor to the higher population growth in the LPA in 2011-2020. In other words, the historical population base data used by the consultant is skewed, in that it reflects the deliberate displacement of housebuilding from the SDNP to the LPA. The historical base data reflects the SDNP not meeting its own housing need, and so (logically and inevitably) the numbers resulting from calculations extrapolating that historical base data (i.e. only 115 p.a. for the SDNP) cannot reflect the SDNP meeting its own housing need in the future. Skewed data input means skewed data output. In our view, this completely invalidates the 517/115 split of the 632 new homes p.a. housing need figure. In our view the most sensible and reasonable way to split the 632 number (or any other substituted district-wide number) is on a proportionate population basis, i.e. SDNP 174 p.a. (27.5%), LPA 458 p.a. (72.5%). If the LPA and the SDNP were each to accommodate their own housing need in full, we don't see any credible reason why East Hants population growth rates in the SDNP and the LPA would differ. In the HEDNA, the consultants themselves confirm that the entire district is a single Housing Market Area, which implies that assigning differing population characteristics to the SDNP and LPA is an artificial concept. In addition the Local Plan should be made flexible enough to take into account changes (during its term) to housing need figures brought about by: Affordability improvement following house price movements (better affordability = reduced new housing need); A change to the need calculation methodology mandated by Government; Changes to any co-operation agreements with neighbouring planning authorities; Abolition by Government of top-down housing targets (which appears to be happening already). In practical terms this means deferring the nomination of named housing sites that would be developed more than, say, 10 years in the future, to permit future reductions to housing need to be accommodated.

Levelling-Up & Regeneration Bill

The Government has agreed local councils can have more leeway to depart from centrally-set housing targets.

The government's new flexibility around housing targets should be used to reduce this number. The housing target should be set according to predicted demographic need

Change in government policy

Since the government has at advised that centrally-determined housing targets are now flexible the standard method for calculating need used by EHDC is both unnecessary and unfair on those already living in East Hants outside the NP. EHDC should instead plan for enough houses to be built to meet demographic needs but no more, to avoid damaging the environment through over-development.

The government are currently discussing changes to the levelling up and Regeneration Bill which will almost certainly result in a change in status of EHDC requirement for a 5 year stock of housing sites. The National Park taking up so much of the area means a disproportionate level of housing being placed in the remaining portion of East Hampshire. The process should be suspended pending the outcome of the revisions to the bill.

EHDC should consider the outcomes of the new housing bill currently before Parliament and rework their HEDNA housing numbers before proceeding further.

The government is not enforcing housing targets any more. There needs to be a reassessment post Brexit and COVID to understand the revised needs. There also isn't the economics to finance the resources and infrastructure that goes with the new homes. The developers contributions are mostly wasted. A complete rethink is needed, as what is happening with new builds isn't working for anyone.

The government is revisiting the basis of assessment. There seems little point in binding a District to an artificially high calculation of housing need.

Minimum requirement

This is the minimum requirement, and should be used as a starting point.

Yes the housing need figure should be a minimum 577 dwelling per annum plus an additional 100 per annum of affordable homes delivered via Neighbourhood Plans. The housing provision identified does not include any potential to meet the unmet needs of neighbouring authorities.

In an area as unaffordable as East Hampshire the figure should be seen very much as a minimum and include a further buffer requirement to meet expected increases and as required by Guidance a suitable non implementation rate.

Brownfield

The government method should be skewed to using brownfield sites first. The list of brownfield sites should inform where new houses should be placed and only the minimum no not able to fit on brownfield sites should be planned for in local district plans.

The government plan does not sufficiently prioritise brownfield sites. Nor have they held developers to account for ensuring affordable actually means affordable. Until the government have a proper review of their policies (or there is a change of government), centralised targets are not the right way forward.

Environment

To protect important ecological areas of importance
Th area is too rural and could use up valuable green spaces
There is not enough employment to sustain that population growth locally, so immediately you are contravening the goal of sustainability and impacting the environment issues by forcing the people buying these homes to commute. it's a vicious circle that you have no plan to break.
Too much green land being built on and habitat destruction for wildlife - specially in Alton

Unclear

I'm unsure as to whether the figures are talking about people already within the area needing homes or whether building more homes is just to encourage people to move into the area which locals don't particularly want.
Does the limitation of development in the National Park unfairly burden the rest of East Hampshire?
I would need to hear the alternatives before I could decide which were 'strong' reasons - and no alternatives are being outlined here
It still seems an inordinately large number of new homes. From whence does all the demand arise?

Other comments

This software doesn't allow me to adequately answer the question, I cannot review what I have written. This software doesn't allow me to adequately answer the question, I cannot review what I have written. If I understand correctly, your calculation does not seem to allow for applications that have not been started for may have lapsed over time. If I understand correctly, your calculation does not seem to allow for applications that have not been started for they have lapsed over time. Using the existing unbuilt backlog through to the end date Could result in a shortfall for the next period necessitating an accelerated planning process.
Working patterns are changing as more people work from home. Many workers are therefore able to move to areas with less expensive housing and still keep their jobs to work
The existing plans/ newly delivered houses need to bed in to the existing towns like Liphook, Bordon and Alton. Bordon in particular has undergone incredible growth adding several thousand homes and now the town needs to be able to bed in sand settle. On addition the older generation in terms of people outnumbers current working age generations so allow for the natural release of housing stock on to the market as life takes it course for the elderly
It has to be more flexible

This area takes too much new housing
It's too ridged.
There has already been massive development in some areas. They should not have MORE imposed on them
yes, see Pop1A answer
Too much over development already.
As before - the figure should be lower.
Already overdeveloped in the surrounding areas
Please see previous question for the same answer
we have had thousands of new homes in last few years
Continuing examination of need must be undertaken in view of changing circumstances
The need for houses differ in different areas you seem to put to many in the same area.
it will be wrong. Therefore, plan should range (with say 517 in the middle) with impacts measured for at least high, middle and low new homes
yes because I do not believe Alton has any more space available for additional housing. Certainly not Chawton Farm that has been visited already. It is such a shame that we are not represented by a decent council. EHDC are really not fit for purpose as far as I can see.
As stated in previous question , so far only one alternative method of calculating housing need has been explored. Comparison with other councils in the same position regarding national park areas should take place, before making this vitally important decision
Need to know where development will arise and why
A blanket figure cannot be used, care must be taken to develop where it is really needed to support the working opportunities not just to fill in gaps in rural areas
<p>The target for new houses specified in the document does not reflect the current need of our District and has been set at an unnecessarily high level under the current Standard Calculation.</p> <p>Further consideration should be given to the following issues: i) The national park covers 57% of the district but currently takes a fraction (just one sixth) of the JCS Local Plans allocated homes . We fully support the statement made by the Leader of East Hants District Council when he said (in the article in the Alton Herald of 15 December 2022), It has long been our opinion the government method to calculate housing figures is inadequate and unfair for areas like East Hampshire. This is especially when you consider our relationship with the South Downs National Park. The national park covers 57% of the district but takes a fraction of the allocated homes.</p> <p>ii) The current housing requirement for each local authority is based on out-dated information. Furthermore, these 2014 household projections are based on the 2011</p>

census. Now that the 2021 census data is available, we recommend that the future housing needs for the next 15 years should be based on the most up-to-date data.

iii) This consultation is premature in view of the letter of 5 December 2022 from DLUHC to all MPs. The housing targets have always been the starting point for local plans and this letter indicated a move to "advisory" housing targets and allowing departures for exceptional circumstances. The change from in reality mandatory to advisory housing targets, as set out in the DLUHC letter means that this Consultation is effectively out of date as regards housing numbers as the official numbers will become only the starting point. It seems that departures from this starting point will be permitted at Examination if to take account of factors such as local constraints, the character of the local plan area and concerns of the local community. We recommend that both the total numbers for the District and the split between the National Park and the LPA are reviewed and are the starting point before any strategic delivery options can be considered and decisions made. Therefore, EHDC should follow the example of other LPAs and wait for government clarification of changes to the NPPF and especially how the LDP 15 year housing target will be derived going forward.

2. THE AFFORDABILITY RATIO. The Affordability Ratio is one of the key aspects of the Standard Method of calculating housing need that we believe to be unfair. According to the HEDNA, the target for housing in East Hampshire needs to be increased by 66% over and above the projected need of the inhabitants of East Hampshire. We believe that that is an unjustifiable burden on the local residents. We also believe that the fundamental rationale for the Affordability Ratio is flawed. The rationale put forward is that a significant increase in the supply of housing will lead to a material reduction in the price of housing, making housing more affordable to the many local residents who are currently priced out of the market. We can find no evidence to support this thesis. In fact, the data suggest the opposite. According to the census data, over the last 10 years, the number of households in East Hampshire grew by over 11%. During this time, the number of households in Four Marks/South Medstead grew by over 25%. In neither area is there any evidence that this increase led to a reduction in house prices. Indeed, the data suggest the opposite. In the same period, house prices in the GU 34 area, have gone up by over 30%. There are a number of reasons as to why the market may have responded in a way that is diametrically opposite from the one that was posited. We highlight two of them:

i) The Affordability Ratio has a built in incentive for developers to build more expensive houses. The algorithm used means that the more houses that are built above the median house price the greater the number of houses that the LPA is required to get built.

ii) These houses are attractive to those who want to move out of London. For those who have sold at London prices, this is an attractive opportunity to move to the countryside. This then prices local residents out of the market. With regard to the detail of the calculation of the Affordability Ratio, we are also concerned about the data set that has been used to generate the figure of 14.51%. An analysis of the data included in the HEDNA suggests that - Some of the trends implied by the data are unreliable -

The actual Affordability Ratio could be as low as 9.8%. This is very significant, because a re-assessment of the Affordability Ratio could lead to a reduction of 112 dwellings pa or 1680 across the period of the Plan. We recommend that the whole data set for the Affordability Ratio is subject to a rigorous review before any strategic options are considered.

The change from mandatory to advisory housing targets, as set out in the DLUHC letter means that this Consultation is effectively out of date as regards housing numbers as the official numbers will become only the starting point. It seems that departures from this starting point will be permitted at Examination if to take account of factors such as local constraints, the character of the local plan area and concerns of the local community. It remains to be seen how these reforms will be implemented through the Levelling Up Bill and changes to the NPPF. We consider it would be appropriate for East Hampshire not to

progress this Plan further until the new principles on housing numbers are clarified, and can be incorporated into a draft Local Plan for further Regulation 18 public consultation. The current housing requirement for each local authority is based on out-dated information, i.e. the 2014 household projections - a view shared by many in the planning world. The 2021 census data is highlighting the shortcomings of the projections, particularly in respect of the authorities in urban south Hampshire. The change to advisory housing targets may well bring a move to using up to date household projections (as otherwise many authorities would no doubt seek to justify departures to reflect up to date projections). In that event we would expect the Council to re-base the number of homes in the Plan on up to date projections and soundly based local needs assessment. This may lead to a justified departure from the figures based on the standard methodology. If numbers of homes beyond real local needs are planned for, as in the past, towns and villages would face unnecessary development on greenfield sites which would further damage character and distinctiveness by encroaching on countryside settings; and which would rely on the private car for most journeys due to the lack of public transport. This would work against the Councils meeting its climate change objectives. Further, the continued provision of more housing puts yet more strain on our already diminishing water resources and quality. While the announced changes envisage a removal of the need to maintain a rolling 5 year housing land supply, the detail is unclear and it appears to remain in place at present. Recently, the council has faced difficulties in maintaining a 5 year land supply and defending decisions to refuse speculative applications for development. It is important that the situation is not exacerbated for the future by planning for more homes than necessary. Affordability Ratio One reason for higher numbers has been the Affordability Ratio. This is a required element of the standard methodology. It is intended to improve affordability of market housing over time by reducing the cost of market housing relative to earnings. However, in East Hampshire there is compelling evidence of the opposite. Over the last 10 years, some settlements have seen increases in housing numbers of 25%, yet the price of housing has increased by a similar amount. This is a function of an algorithm which requires that where the multiple of the median house price relative to the median salary increases, the number of houses that need to be built must also increase. This gives a perverse incentive for the development industry to build more houses above the median house price. So where new expensive houses will sell easily, as in East Hampshire (often to those moving into the local plan area), this has the opposite effect than planned and in practice does not make housing more affordable. In the consultation document the Affordability Ratio is stated to be 166%. That is an additional 251 dwellings pa on top of the 381 calculated as the local need. Across the period of the whole Plan, that equates to 3765 dwellings, but the HEDNA shows that the provision of these additional dwellings is not required to meet the needs of local people. As Table 6.6 demonstrates, the local needs as defined by natural change have actually declined in recent years; so more than 100% of the increase in population has come from net internal migration. It follows that the high Affordability Ratio being used is materially distorting the understanding of housing need in East Hampshire. In the HEDNA a range of Affordability Ratios can be found ranging from 9.8 to 14.51. This range represents a difference of up to 112 dwellings pa, or 1680 across the 15 years of the Plan. Yet the higher value of 14.51 has been selected despite the adverse consequences of using a higher Affordability Ratio, as outlined above. We consider that a lower Affordability Ratio can be justified in the circumstances of East Hampshire, which would lead to a lower housing number.

POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? (Y/N)

POP2a Please explain your answer

Explanations provided by those who answered 'No'.

South Downs National Park

SDNPA needs to find a way take a more equitable share of the burden.
It would appear to be wholly unfair to expect EHDC to find space for over 500 homes and the SDNPA to only have to find space for 115 homes, when the SDNP covers upwards of 60% of the districts and isn't even reaching the target of building just 100 homes a year. The SDNPA must cooperate more and take it's fair share of the housing number for the district as a whole.
As stated before, the SDNP area dominates the district and the average house price within this area impacts on the overall affordability calculation, to the detriment of areas outside the national park boundary.
The assumptions on population are already biased due to overdevelopment outside the SDNP

Infrastructure

Currently inadequate infrastructure such as doctors schools public transport
Because the infrastructure doesn't currently exist and is not being delivered ahead of more development healthcare is a good example with new surgeries are only replacing existing ones and won't be able to cope with the extra numbers of patients
At an EHDC level probably not, however local employment opportunity, walk, scoot, ride should determine where in the EHDC area they are needed.

Constraints

The District is not so constrained that a lower number is justified
The district is not covered by a significant proportion of absolute or high-order policy constraints. The Major Developed Sites process showed that there are significant areas of unconstrained land which is available for development. This includes a large area to the South East of Liphook which is suitable and accessible, falling within the proposed 20-minute neighbourhood area for Liphook. All opportunities should be explored to deliver housing and growth in such sustainable, suitable and accessible areas. Indeed, as set out elsewhere within these representations, there is a strong case for EHDC to be attributing a much greater portion of the 632 homes per year figure to the parts of the district outside of the SDNP, whilst opportunity should also be taken to accommodate unmet needs from elsewhere.

Capacity

There are sufficient sustainable locations form Tier 1 -3 across the district that can meet all existing and future housing numbers required by the standard method calculation of 517 new homes per year.
It is such a small number that it will fit into existing land under development via urban renewal
There is no significant reason in my view because the number of settlements within the east Hampshire area is plentiful and more than capable of receiving new homes.
Believe we have or can find the space

Meeting housing needs

It is not considered there are any reasons as to why East Hampshire is not capable of meeting its entire housing need
I would like to better understand whether the standard method (augmented by the alternative calculation) overall number for the District correctly reflects the needs and constraints of the SDNP or whether the District is still picking up an unmet need in arriving at the 517 figure. My view is that we must meet the need in the District as long as we know what that is
If that is the genuine housing need and doesn't include need for other authorities, then we should use those figures.
We need housing to support our economy and give the next generation somewhere to live
Should meet our housing needs
With regard to the duty to cooperate account should be taken for meeting additional need accordingly.

Affordability / affordable housing

We need to meet housing need as housing is unaffordable
Blunt tool, locally there may be more or less need, quality affordable housing fully integrated into all development, not sidelined to poverty areas of development
We probably need to do this, but they should be suitable for the people that need them, both in terms of cost and accessibility.
So long as the affordability issue is addressed within the number of homes required
Lack of housing in general especially affordable
The housing need figure is a recognized approach to calculating housing need which is consistent with national policy. The figure should be treated as a minimum to be exceeded

where possible in order to significantly boost the supply of homes and the acute affordability issues affecting the area.

Data/calculation

POP1 and POP2 should be treated separately as two distinctive planning figures and not by excluding each other

If these figures are the outcome of a formulaic calculation (assuming the formula is correct!), this is the number. However, this needs to be nuanced by the type of homes to be built and it is hard to see how this `this is the number` approach addresses the type of housing need adequately.is

The calculations support this number with sufficient accuracy.

EHDC should use the scrapping of mandatory targets to set a target that matches predicted demographic changes in the area.

This sort of exercise would be very technical and then discounted by others

Without knowing fully the detailed calculations, the figures seem fine.

Clarification

No significant difference between the methods, but where does 517 houses/yr come from?

If there has truly been a robust and 'fair' assessment of housing need, why change it?

Assuming the calculation basis is correct, which it probably isn't?

You've proved me with some figures then asked me if they should be used. How can I possibly counteract what you've said?

Other comments

There are no strong reasons!

If that is the figure that is the figure

I did read it and it seems reasonable

There are no strong reasons that I can think of.

I lack the knowledge and experience needed to answer this question.

There are no strong reasons as far as I can see.

Seems OK to me !

See my answer to question POP1a
It will lead to legal appeals
Evidence shows this
See previous answer re no using the Standard Method
I think 500 houses per year is reasonable
Because it Will change
Given that the government has put this calculation method in place, we have no option but to go along with it.
Good to have a number in mind but should be flexible in response to need or availability of sites.
Based on the formula No. Government policy on private rental properties would be helpful in freeing up property for private ownership and in my view would be the better option. View
Unfortunately the popularity of the area means population growth
But it all depends on where you put them. It should not be green field sites
This system appears to work and I am a great believer in. If it isn't broken you don't need to fix it. However I do feel we need to be much more or green and use wind, power, solar panels et cetera on every new development therefore aiming to be carbon neutral and more self-sufficient off the grid.

POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? (Y/N)

POP2a Please explain your answer

Explanations provided by those who did not select a response but provided an explanation

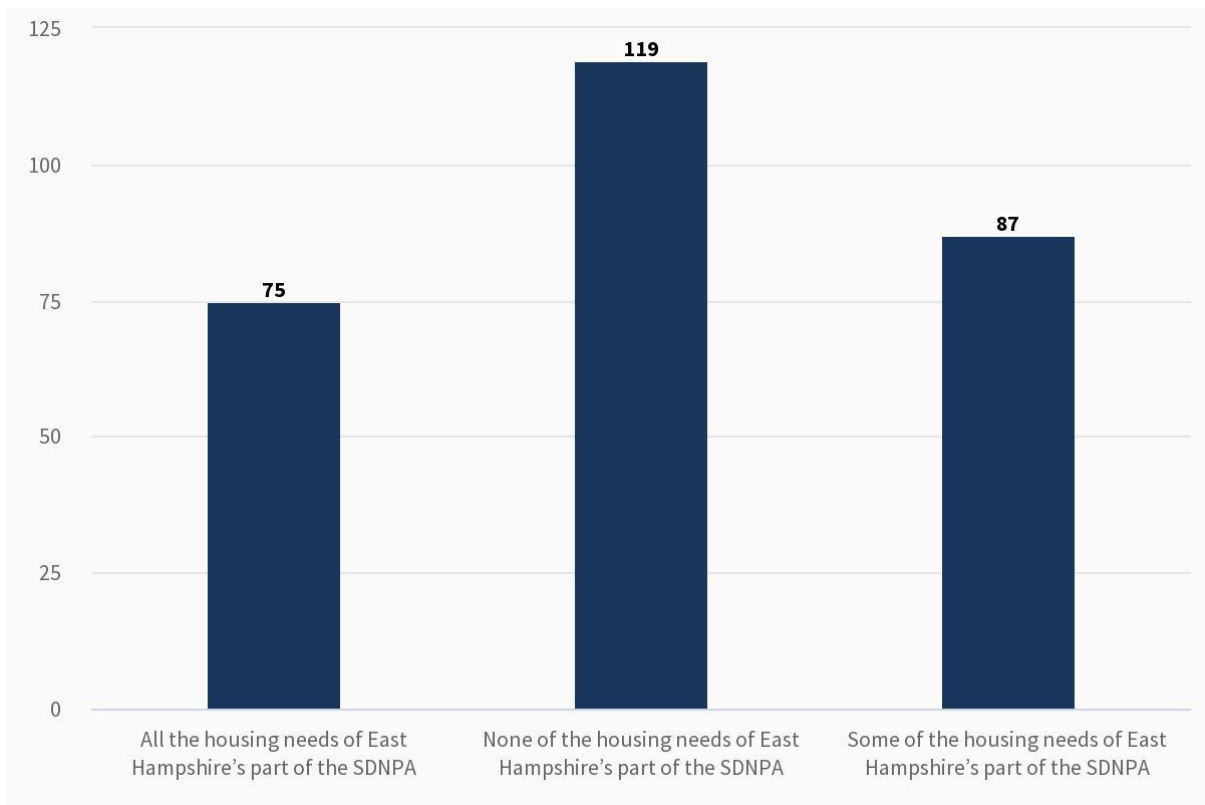
<p>EHDC is constrained by a large part of the district falling within South Downs, however, there are sufficient sustainable locations form Tier 1 -3 across the district that can meet all existing and future housing numbers required by the standard method calculation of 517 new homes per year.</p>
<p>Keep open mind but be aware of natural limiting factors, topography, geology, hydrology and also water supply and sewage. The River Wey currently does not meet the Water Framework Directive for good ecological condition and the reason is sewage with much discharge of untreated in wet weather, a condition that will be met more frequently with Climate Change</p>
<p>It doesn't take into account that we are being obliged to build the houses that would otherwise go in the national park. No-one who called for the establishment of the SDNP envisaged that this would lead to the establishment of a 20 mile conurbation along its north western border.</p>
<p>I don't know enough about the ramifications of this to choose an answer.</p>
<p>this need for extra building is completely made up - the population is now ageing and falling. We need to make more efficient and effective use of what we have.The</p>
<p>Only if the young people who have lived here all their lives can have a home they can afford here otherwise it will be an old town</p>
<p>Yes there is no evidence base that this top down figure from Govt is needed locally or even sustainable. Where are the base line studies for water supply, waste , biodiversity impact, climate crisis, NHS, Schools, road capacity and pollution such housing numbers year in year cannot ultimately be sustainable and will trash the very special wildlife, countryside and landscape that makes East Hampshire so unique / special. Poor planning in areas like Fourmarks are already causing sub-urban areas in the countryside, more housing in Whitehill and Bordon will trash its internationally important Wealden Heaths SPAs and SACs, and historic landscapes of Mediaeval Commons and Royal Woolmer hunting forest, let alone its bronze age landscape.</p>
<p>Based on the wrong 2014 ONS projections</p>
<p>Housing required for single people with a variety of different needs.</p>

POP3 Based on the above should we meet

All the housing needs of East Hampshire's part of the SDNPA, or

None of the housing needs of East Hampshire's part of the SDNPA, or

Some of the housing needs of East Hampshire's part of the SDNPA.



75 respondents (27%) selected meet 'All the housing needs of East Hampshire's part of the SDNPA'.

119 respondents (42%) selected met 'none of the housing needs of East Hampshire's part of the SDNPA'.

87 respondents (31%) selected meet 'some of the housing needs of East Hampshire's part of the SDNPA'.

POP3 Based on the above should we meet

All the housing needs of East Hampshire's part of the SDNPA, or
None of the housing needs of East Hampshire's part of the SDNPA, or
Some of the housing needs of East Hampshire's part of the SDNPA.

POP3a Please explain your answer

Explanations from those who answered 'All the housing needs of East Hampshire's part of the SDNPA'.

Evidence

Continue as before.. no evidence to move away from a similar plan to before
These numbers are so small. I can't see where the evidence is that there should be a move away from meeting all of the housing needs
It is not considered there are any reasons as to why East Hampshire is not capable of meeting its entire housing need
As the consultation document sets out clearly on page 24 there is no new evidence that justifies any deviation away from the existing approach agreed in the Statements of Common Ground between the two authorities.
The assumption that the SDNPA can accommodate 115 dpa is not justified and is not based on consultation with the SDNPA. We believe it is inappropriate to push such a percentage into a constrained area, not least without consultation.

Proportions / distribution / quantum of housing

The SDNPA needs to drastically increase its number of houses in its area, moving beyond the current numbers. Areas like Alton have already met ample housing targets in the past. Time for other areas to contribute to the district's needs.
The SDNP can be preserved at that level of development and squeezing other areas to take more , just to reduce a more modest development in SDNP is not logical
There are strong arguments in favour of increasing the SDNPA proportion BEYOND the 115 homes p.a. suggested. Petersfield, within the SDNPA, is a town like any other, with no claim to "landscape and scenic beauty". It could easily accommodate housing growth at the same rate as Bordon or Alton. Giving Petersfield protection in the calculation formulae is a vicious circle - it puts added pressure on the rest of the district, heightening disparity.
There need be Little or Modest-only unrestricted housing allocations within the SDNP.
There are plenty of options to develop such modest targets within the national park, without significant impact.

The allocation of 115/yr should be increased to take pressure off Local Plan areas adjacent to the Park
conserving landscape and scenic beauty is important throughout the district and I do not think the SDNP should be treated differently
SDNP is not special here in Liphook. Its farmers fields - if it was ancient woodland that would be different and need further consideration.
There should be a lot more houses built in the park there is an enormous amount of land that's actually not park land that could be built on without damaging the park.
We need to spread out housing and not crowd it into small areas.
The assumption that the SDNPA can accommodate 115 dpa is not justified and is not based on consultation with the SDNPA. We believe it is inappropriate to push such a percentage into a constrained area, not least without consultation. If the SDNP was not a separate planning authority, EHDC would no doubt be looking to accommodate the housing need in full outside of the national park area. The district includes many large, sustainable and accessible settlements including the tier 1 settlement of Liphook. The Major Development Sites exercise, and the Land Availability Assessment, show that there are significant areas of suitable, deliverable and available sites to accommodate the housing need outside of the SDNP. All opportunities should therefore be explored to accommodate the local housing need figure within the EHDC area outside of the SDNPA.
There is minimal differential in beautiful landscape inside and outside of the SDNP yet the current policy means that green fields and wild flower meadows are being destroyed just because someone decided many years ago to draw a line on a map that did not take into account the effect it would have in respect of increased housing. As Damian Hinds has already highlighted the cost of housing for people living within the SDNP is significantly higher than properties outside due to the lack of housing within the SDNP. There are many areas within the SDNP that could take on a new village which could be developed in such a way that it would enhance the area and bring much need housing that local residents could afford to move into.

Housing need / affordability

Lots of towns within the SDNPA need houses
people still need to live and work in the SDNPA maintaining communities and diversity
A shortfall of 15nr homes year on year will have a large impact across the whole programme period and in the grand scheme of things is a small amount of additional requirement which will assist the worsening housing crisis
The SDNP occupies a large part of EH. SDNPA must plan to meet the relatively small level of development with SDNP. There are real housing needs in the SDNP communities.
By meeting the full Standard Methodology figure for the District, as suggested as a minimum above, the Council will arguably have met the SDNPA's housing needs outside of the park assisting affordability and a portion of latent affordable housing need.

Any shortfall in the 115 per annum requirement within the East Hampshire part of the SDNPA should be made up within the East Hampshire areas outside of the National Park. This would ensure that the objectively assessed housing need for East Hampshire as a whole is met in full.

As noted above in response to question POP2, it is not considered that the HEDNA document provides for a sufficiently robust assessment of the capacity of the part of the District that falls within the SDNP to absorb any additional development without harm to protected landscapes. In the absence of that level of finer grained and likely landscape led assessment, it is considered that the emerging plan should seek to meet all of the needs generated by the District (including that falling within the SDNP) in the areas that are not constrained by national park designation. Although it is noted that the housing need figure is policy off and that a further assessment would seek to identify how much of that need would be appropriate to translate into a housing requirement (i.e. policy on), seeking to split the need into non-SDNP and SDNP zones at this stage would risk placing unrealistic expectations around housing delivery on the part of the District within the SDNP. This would either result in development that creates harm to protected landscapes, or as is more likely the overall housing need not being met due to difficulties with meeting that proportion of the need within the SDNP.

`giving priority to meeting affordable need and/or supporting the local economy and local communities within the SDNP.` This is the key statement, here, and should be the golden thread of the SDNP planning thinking.

Type housing

If done carefully and sensitively this should be possible. However chucking up a bunch of Barrett boxes willy-nilly would be unacceptable.

Protection of the South Downs National Park

SDNP should have priority to reserve its unique identity

We do not wish unrestricted housing growth in the National Park.

To maintain areas of great and unspoilt beauty

Equality / responsibility

Fairness

SDNP needs to take responsibility for more housing needs and not put them all in East Hampshire

Seems right

SDNPA needs to assist EHDC to meet the demand for more affordable homes in the district.region.

They must take their fair share and, if necessary, concentrate on the major towns such as Petersfield.
Either you get the SDNPA to deliver or you pick up the slack. They are failing in their delivery; we need more homes!
we should meet the correct needs (see previous answers) and not have to rely on a compromise with other parts
There are plenty of beautiful areas outside of the SDNP that are being developed. It's creating a social divide where the Southdowns bare no responsibility or wanting for more houses. Why everywhere else on the remaining land is seeing over development.
The settlements within the SDNPA are the most sustainable and should be delivering more housing which can be accommodated without harming the character of the National Park. They should be taking their fair share of housing and not imposing these on the northern and southern parishes. 115 homes/annum is a marginal figure to be spread throughout the SDNPA part of East Hampshire.
SDNP need to meet the required numbers too
SDNP is not special unless it's an ancient forest –
SDNPA does not take enough housing allocation and it needs to be addressed

Clarity

I'm not entirely clear what I'm being asked here. Do you mean that all the housing needs should be met outside of the SDNP? The question is confusing
Why would you risk not meeting the needs of its a national park surely the applications can only be granted on the boundaries or outside this area of protection

Other comments

Is a good plan to keep up with population growth and making sure affordability is considered
Should follow research provided by EHDC
I believe that the SDNPA can meet their own housing figures
In relation to the South Downs National Park Authority (SDNPA) the consultation document notes that 115 dwellings per annum (dpa) are required in the parts of East Hampshire which fall within the National Park. The SDNPA are in the process of preparing an evidence base in support of at Local Plan Review. The latest Authority Monitoring Report (AMR), published in December indicated that the authority was able to meet is Local Plan housing target in years 2014/15-2019/20, and only fell short in the monitoring year 2020/21 due to the impacts of the Covid-19 pandemic. Therefore whilst currently the SDNPA do not have an unmet need in relation to its housing targets, this may change following revisions to the standard methodology, updated Local Plans and housing policies in other neighbouring authority areas, and updates to affordability ratios or

household projections between the current consultation and adoption of the new EHDC Local Plan. Therefore Grainger feel that the Local Plan should contain sufficient flexibility to provide any unmet need from the SDNPA should this arise over the next few years.

The current priority should be to use brownfield sites only until exhausted. This should reduce the No of houses elsewhere required in the local planning area quite considerably allowing the reduced No to be more easily accommodated.

POP3 Based on the above should we meet

All the housing needs of East Hampshire's part of the SDNPA, or

None of the housing needs of East Hampshire's part of the SDNPA, or

Some of the housing needs of East Hampshire's part of the SDNPA.

POP3a Please explain your answer

Explanations from those who answered 'Some of the housing needs of East Hampshire's part of the SDNPA'.

Evidence

Again the problem is oversimplification. The projection actually forecasts a reduction in 17-64 households in the SNDPA. What is needed as a critical part of both plans is how provision for over 64 is to be met.

Proportions / distribution / quantum of housing

We should not anticipate being the 'automatic sink' for the housing needs of the SDNP. Surely they should be living close to their places of work so long as it carbon neutral.

The current agreement with SDNPA, that they deliver 100 homes a year, should be continued. The balance of 15 dwellings a year should be added to housing requirement for the EHPA.

SDNPA cannot remain unscathed and it should be open to being lived in. The countryside is a living thing not a green museum. We will to consider the possibility of wind farms and solar energy even if it impacts in the view. There is going to have to be compromise to get to carbon Zero as without this the SDNP will fall in any event.

It's too much to expect an area containing a National Park in to build the same as an area that doesn't contain a National Park with its accompanying building constraints.

The SDNPA covers a significant area of East Hampshire so the plan should allow for a higher proportion of sympathetic developments within the SDNPA.

Reduced houses

It is unreasonable to overdevelop villages in one part of East Hants to benefit villages in others

You cannot expect surrounding areas to take up all the slack

why should parts of East Hampshire have to have all the housing forced on to it. Surely the government must understand that when the National park is removed from the map of East Hampshire there must be other places to build rather than in Alton.

This is back to the point about keeping local communities together. Some development in the SDDNPA is vital.

As areas outside of the National Park are not constrained in the same manner as a protected landscape (i.e a National Park), East Hampshire should accommodate an appropriate level of growth in sustainable locations.

we need to define and restrict some. Some market towns e.g. Alton, should be regarded as full with the current wave of new developments. Deaths and those leaving the area will keep a supply of homes available.

SDNPA should support some on an ongoing basis even if it only a few. There is do doubt still growth in their area.

Housing need / affordability

Irrelevant as there are no housing needs in East Hampshire

The housing need is very low

As before - you need to meet the needs of current residents before increasing the burden on infrastructure

Type housing

Reduce EHDC housing density and pressure on services, and make it easier to plan for affordable housing.

There is no reason why not more homes can be built in the SDNPA however they need to be in keeping with the surroundings so tatched cottages with decent gardens in low density areas.

Need more information on determination of type of housing

Protection / characteristics of the South Downs National Park

Given the policy requirement that great weight is given to conserving landscape and scenic beauty in National Parks the opportunity for new housing development will be restricted accordingly. Geographically it would be logical to expect other neighbouring authorities to also accommodate some need.

It is considered appropriate that some new housing is delivered within the SDNP area of East Hampshire. This is important to maintain the vibrancy and vitality of the area. It must, however, be recognised that the SDNP is designated as such due to the special qualities of the area.

There is a need to conserve and enhance the landscape within the South Downs National Park which will result in some limitations on development. Given the planning constraints within the National Park, it is considered likely that less housing will be delivered. It would therefore be appropriate to factor in providing for some of the housing needs in the South Downs National Park.

There is a need to conserve and enhance the landscape within the South Downs National Park which will result in some limitations on development. Given the planning constraints within the National Park it is considered likely that less housing will be delivered and therefore it would be appropriate to factor in providing some of the housing needs of the South Downs National Park Authority.

We must protect the national park. Once it's been built on, it will be too late to get it back.

Formation of the National Park placed more pressure on Hampshire to deliver additional housing. The benefits associated with having national parks are of national consequence, and the cost of the same should be born nationally, not by immediately adjoining counties. The benefits associated with having national parks are of national consequence, and the cost of the same should be born, nationally, not buy immediately adjoining counties. Creation of national parks by default, except that less people will be able to afford to live in those areas as time goes on, and those people will relocate around the country. National parks are a national institution and should be considered as such.

conserving landscape and scenic beauty in National Parks,

Sdnp has priority for protection, forcing numbers will come at a cost

It's a national park and should be preserved

I have been horrified at the housing development permitted within the SDNP. The area is being spoilt, not protected by the amount and style of housing being built. We need to protect the SDNP by increasing the building outside, not inside it.

Equality / responsibility

A split between the two areas seems reasonable.

It's not fair to put the majority of the houses near the green spaces outside the SDNPA. It will become, a concrete jungle

SDNPA makes up a large part of East Hants and should therefore take its share of the housing requirements. However it should be in the SDNPA that is connected or very close to existing developments with sufficient infrastructure to support increased housing, such as Petersfield, where there is a train line, shops, buses etc.

there needs to be fairer and more equitable split of housing delivery between ehdc and sdnp as th park covers approx 50% of the overal area and whilst it is important to protect valuable landscape that should not result in the destruction of valued landscape outside the park area the

Perhaps the towns and villages within the SDNP should meet their housing responsibilities by focussing on multi-storey medium-density housing along the railway and motorway/A road corridors.

Ensure fairness across the district.

Share

Needs more fairness

Clarity

See my previous response. I am very confused by the calculations of housing need.

Other comments

We should only accept limited housing needs of SDNPA.

EH should have to take over any housing needs foR SDNPA.

Meeting some looks sensible and a good compromise

I agree with the information outlined above in regard to this question

Leaves some leeway for SDNP to increase their contribution.

There is a debate to be had as to the reasonable quantity agreed.

Petersfield is part of SDNPA and its allocations are considered in their plan

The SDNPA has more constraints than the remainder of East Hampshire District

My Parish of Grayshott is unlikely to agree to support significant additional housing. I the rest of East Hampshire can agree to provide the numbers then no objections.

We are a retirement community and the SDNPA is a great area to retire.

Local employment and walk, scoot, ride rules should apply.

In order that the historic shortfall position is not exacerbated.

These figures are much more sustainable then the pop2 figures

POP3 Based on the above should we meet

All the housing needs of East Hampshire's part of the SDNPA, or
None of the housing needs of East Hampshire's part of the SDNPA, or
Some of the housing needs of East Hampshire's part of the SDNPA.

POP3a Please explain your answer

Explanations from those who answered 'none of the housing needs of East Hampshire's part of the SDNPA'

Quantum of housing / proportionate / equality incl. SDNP should meet its own requirements

We no longer will have a JCS with SDNP. Therefore they should take an increased level of housing, not the proposed 517:113 ratio proposed.
SDNP can build more than 115 pa. We should not help as they have underperformed This distorts EH figures and causes maverick planning decisions based on numbers to need
It is grossly unfair that the SDNP has a much lower allocation of new housing despite it having the bigger landholding. There must be a fair and equitable distribution which they have not yet achieved.
The section of East Hampshire outside of the SDNPA has already carried the burden of squeezing the EHDC quota into less than half of the land.quota
Wrong to expect 40% of the area to take all 100% of Gov figure
All population centres/villages can accommodate their new housing need of 115.
The SDNP must accept and fulfil their proportion of the requirement in full, the LPA have already been put under acute pressure due to historic shortfalls
SDNP needs to take its share of new housing based on population, or better still land area
SDNPA must be held accountable for housing provision within their boundaries
It is a very large area to find space for 115 house should not be difficult even though it is NPA. There is no need to build up other area with their quota, when 115 house over the space available will be negligible impact.
The SDNPA should plan for their fair share, ie 115 per year
It would appear to be wholly unfair to expect EHDC to find space for over 500 homes and the SDNPA to only have to find space for 115 homes, when the SDNP covers upwards of 60% of the districts and isn't even reaching the target of building just 100 homes a year. The SDNPA must cooperate more and take it's fair share of the housing number for the district as a whole.

SDNPA should meet its own identified requirements.
It would appear to be wholly unfair to expect EHDC to find space for over 500 homes and the SDNPA to only have to find space for 115 homes, when the SDNP covers upwards of 60% of the districts and isn't even reaching the target of building just 100 homes a year. The SDNPA must cooperate more and take it's fair share of the housing number for the district as a whole.
For reasons already given the SDNP and the rest of EHDC area should have seperate housing quotas and we should not have to keep taking the SDNP's housing in an area with far less land available
Why should our LPA take any of the SDNP quota of new housing. If the SDNPA decides not to take its fair share of its housing requirement then it is their problem, not something which should be added as an additional burden to those communities that surround the National Park.
The SDNPA has plenty of space to accommodate more than 115 homes per year so should actually be offering to take some of the 517 homes from EHDC.
While the intrinsic beauty and landscape of the SDNP should be preserved, there is land in towns like Petersfield for housing and infill which could be built on without any detriment to the beauty of the SDNP and its vistas. No reason why there cant be building within the SDNP in existing built up areas. The SDNP is not all a rural idyll. There are plenty of opportunities within the SDNP to build to support local communities, housing needs economy etc.
SDNP should be meeting the 115 homes themselves these should not be taken with EHDC area outside the National Park.
If SDNP has been tasked with delivering X houses it should be made to deliver them. As per previous answer plan/model for them not doing so, but don't just cave in and dump on the rest of us.
The NP are getting a free ride on the rest of EH and this is plainly unfair, Petersfield is not taking it's fair share and Alton/Borden/Four Marks pick up the slack
SDNPA should bear a proportionate part of the housing allocation
If SNDPA has a figure calculated on the same criteria it's up to them to build to that not rely on neighbours to do so on its behalf.
Unfair to dump all SDNPA share on the rest of us
SDNPA has already got a cushy number where they don't have to build anything like the number of new houses in other area. Let them sort it out.
There are places within the SDNP that are suitable for much larger development (e.g. Petersfield, Liss). These should take their share and should greatly increase their percentage rather than reducing it
There is suitable land available in the SDNP boundary that does not impact on the protected areas and is in prime location for access to infrastructure and amenities without

the use of a car. These options should be looked at, and not be subject to squabbling and council politics.

It is unreasonable to burden the rest of East Hampshire with an increased housing requirement as a result of the presence of a nationally designated "National Park". It will be sufficiently difficult to gain consensus on a large requirement for additional housing without exacerbating the challenge by including house growth for adjacent areas. The only way I can see for local residents to accept the additional burden would be if an entirely new residential area was developed rather than trying to squeeze additional housing into existing settlements.

Housing need

SDNP needs more housing to create viable populations in often smaller unsustainable rural villages.

It seems likely that the SDNPA should be able to meet the needs themselves, based on the information given.

It's a national park. There should not be more housing needs.

The sdnpa isn't in need of any further development

If I read your statements correctly, you are saying that the SDNP could deliver there housing need. They should do so. House prices within the Park increase with scarcity. Not meeting need fails to allow eg young people, elderly downsizing to remain living in the SDNP.

We already meet more of the needs of SDNPA than we should need to.

In order to survive all communities need some new housing; the villages of SDNP can easily manage their allocated figure of 115 (as opposed to their current 100).

All communities in order to survive need new housing - the village of SDNP can and should also be included in this uptake of new housing in order to survive and progress. They can accommodate their figure of 115

Re my earlier comments, Petersfield is a town with significant facilities and amenities. It is not landscape. So I think SDNPA should focus on meeting its housing needs through the use of the Petersfield town area rather than passing these needs across to outside their area.

The SDNP should meet its own housing needs, they are not being asked to build very much and most of that could be accommodated near Petersfield especially if Penns Place is being sold

Regrettably, if housing is required in the SDNP then it should be met by the SDNPA

As a district, LP should be trying to meet the needs of its population, not shifting delivery about

For the reasons in Pop 1 as well as the SDNP needs to build houses for itself. It needs affordable homes etc so that it is not 'preserved in aspic'. It needs to continue to have a vibrant economy. Meanwhile it's house prices are going up and up and affordability is

getting worse. It is not sustainable to not build houses to meet the demands of the towns within the SDNP. Further I believe that to identify sites up to 2040 leaves no flexibility and flexibility is needed. Also our part of NE Hampshire has 32% of the population in c.25% of the land area and these statistics are on course to get more and more extreme. The Duty to Cooperate is due to be lifted (and replaced with the Flexible Alignment Test which no one currently knows what this means), so this is the direction of travel and should be taken into account.

Consequences

There is no penalty to the SDNP for not meeting its housing need as the fact of it being a national park falls within the general constraint policy.

Although 43% of East Hampshire is not in the SDNP we have our own rural and protected areas and landscapes. Our amenities should not be sacrificed to enable the SDNP to restrict its housing numbers. For example, urban areas such as Petersfield which has areas of brownfield land and the facilities for additional housing.

Although not designated a National park we also have areas of scenic beauty and every attempt should be made to preserve these for the benefit of current and future residents. Do we really want people to have to travel (drive) to enjoy areas of natural beauty when we can have these on our doorstep

The part of East Hants outside the NP would be overwhelmed with new houses.

Whitehill and Bordon is a small pocket which is not protected but being within the SDNP, despite having many unique and sensitive areas of green space which should be protected. As a consequence, this area has already received a large burden of new housing which clearly cannot be supported by the existing infrastructure. Areas of natural beauty are to be decimated for more and more housing, all concentrated in this one small area, it cannot cope with more housing, it's unfair and is changing the landscape and nature of the area in a detrimental manner.

The SDNPA affordability ratio is already much higher than the rest of East Hampshire and without some housing growth communities in the Park will suffer from a gradually aging population, diminishing viability and losses of schools, shops and GPs.

As above the areas around are becoming faceless, choked areas and Hampshire is losing its charm looking at the area you could be anywhere in the UK it's just the town sign that's different.

SDNPA is so large that development will be crammed into the remaining space unless they take their share of new housing

If there is a need for housing it should be spread over the entire district. Building less homes in half the district just because it's the SDNP isn't acceptable. The largest town in the district (Petersfield) is in SDNP so it should be taking its fair share of development. Why should those of us outside SDNP be impacted by the SDNPA's decision to build less than their fair share of houses?

SDNPA's desire for status quo ante in pursuit of an outdated rural idyll should not lead to degradation of areas outside the Park losing their semi-rural identity. Areas must move with the times, which is how the British landscape has evolved.

100 homes a year? How long until there is no more national Park?
If you built 100 homes a year on a national park how long until it's gone?
Already too much common land has been misappropriated which does not say much for the environmental protection policies
There is little distinction in most of EHDC between the area designated as a National Park and the countryside that is outside it. The non NP areas are being actively considered for designation as Areas of Outstanding Natural Beauty so why should these areas be discriminated against in favour of the somewhat arbitrary boundary of the SDNPA. If (and it is a big if) all these houses are required then they must be looked at in the context of the surrounding countryside, employment infrastructure etc
It would seem that the Levelling-Up & Regeneration Bill will remove the duty to co-operate with the SDNP. The SDNP should be obliged to take their full allocation of 174 new houses p.a. calculated as from 2021, 27.5% of the total district housing need (i.e. proportionate to the population living in the SDNP). Otherwise the SDNP constrains some of the more sustainable site options around our larger settlements (Alton, Liphook, Horndean, Four Marks) and so forces development onto non-SDNP greenfield sites that are, in reality, of equal landscape value to the SDNP.

Data / accuracy / achievability

Because as already stated these figures are unrealistic and inappropriate
I do not understand why the SDNP has a figure if the area is not going to meet it. Any figure needs to be relevant and achievable or it will put unnecessary strain on the larger part of EHDC.
Based on the figures, there would not seem to be a requirement to take any part of the Parks' needs
Again I feel we should wait to see if the uplift part of the target can be significantly reduced so that we are building only to satisfy the needs created by household growth, in which case it is better to satisfy those needs where they arise to reduce the climate impact of unnecessary travel.
Because the total numbers are unnecessarily inflated. All of the stated 'need' comes from net inward migration
It would be inconsistent to use a different basis for the SDNPA. Consideration should also be given to conserving landscape and natural beauty outside the SDNPA
The numbers proposed for non SDNP area of East Hants has already been impacted upwards by SDNP valuations and the standard method is flawed. If done by population numbers then the SDNP number would be 174 and not 115. The non SDNP area should not be expected to take on this commitment. Affordable housing is required for those who work within the SDNP and to obviate the commuting out by the ones who can afford housing in the Park and inwards by those who cannot afford the housing.
i don't agree with this blunt approach and the length of the commitment

Michael Gove said on 30-10-22 "We will build houses that are 1. Beautiful 2. have got adequate infrastructure 3. are environmentally friendly. Some of our previous housing targets were wrong." In that case why are we bound to use outdated methods of calculation? Also 47 Tory MP's have threatened to revolt at the prospect of Mr Gove dictating what all councils will have to build following his Planning reforms bill, to the extent that his boss Rishi Sunak backed down on implementing this bill . See The I newspaper article of 23rd November 2022 page 8. Whilst this sort of thing is happening EHDC should explore all possibilities of alternative ways to calculate housing need AND ensure that the SDNP LPA take their fair share of housing .

Type of housing

EHDC and SDNPA should both look hard at how much new housing is really needed and of what type. Careful consideration should be given to avoiding building potential slums of the future (low-cost housing that is poor quality and too small, so with no attraction once it is not new-looking).

The SDNP can in their plan require developments to be small and in character. The SDNP cannot be just an area frozen in time.

NONE of their needs. They could easily build more small developments (up to 20 houses) sympathetically designed to be in keeping with the look and design of existing properties in the villages of the SDNP. i.e not the 4 and 5 bedroom executive homes built on big urban style estates that we get landed with outside SDNP

There is a need within the National Park for modest, affordable homes for people who work in agriculture and local businesses. This need can be met with small village developments of affordable housing that can be sensitively designed and not have a significant impact on the wider environment. As usual, the houses that developers want to build are big, expensive and not for the people who live and work in their communities.

Please refer to my previous answer - we need to be more innovative with our EXISTING housing stock, if housing sizes have increased since the last local plan, but the census advises us that household sizes are not increasing, we (and SDNP) need to increase the intensification of the existing housing stock - this is more environmentally friendly, delivers homes in existing communities, with local facilities near by without destruction of the landscape

The SDNPA needs to step up to it's responsibilities to provide housing that does not disturb the national beauty of the park. It's possible, they just don't want to do it.

Infrastructure

This particular area already has more new homes with NO shops

Again, where's the infrastructure to meet the needs for the new residents?

We just haven't the resources in the area to keep up g.p/ dental/ shops etc

We're loosing all our green spaces!! How about concentrating on Dr's etc for current homes??

Why on gods earth would a town want to take on more development which already has insufficient roads and infrastructure just because another town does not want

There are very strong reasons why EHDC needs to limit its housebuilding, including that the current sewage infrastructure is already beyond capacity and that there is insufficient groundwater to supply this continued growth. (2) If EHDC builds more and more houses in the areas outside SDNP, including the areas immediately around the SDNP boundary, it is damaging the wildlife of the SDNP itself, for example through light pollution and preventing the movement of wildlife through pastureland areas that currently surround SDNP. (3) If SDNP feels it cannot build new homes within its boundary, it should examine if it can adopt other measures that increase the numbers of households/residents that can live within SDNP existing housing stock. Lateral thinking is needed. Only once SDNP has completed this exercise should areas outside of England's National parks be obliged to meet the shortfall.n done,

Over development

The numbers for the SDNP area is very small in relation to East Hants and adding excess to the East Hants will lead to over development especially in the small southern area of Horndean and Rowland's Castle.

Much of East Hants is already over-developed. In any case, centrally-determined housing targets are now flexible.

It should be a 'lived in' part - sympathetic of course, but can not create overcrowding elsewhere

East Hants has already over provided houses to cover the SDNP

Just because the SDNP was 'labelled' as an area of outstanding beauty, this does not mean that the rest of East Hants should suffer from overdevelopment. Many endangered species live both within and outside of the SDNP. Therefore, the SDNP must start taking their share of the housing requirements, to reduce the pressures facing the towns and wildlife that sit outside of the National Park.

East Hants has had far too much development which is changing the character of many towns and villages not to mention not enough infrastructure to support the developments.

Too much over development already

There are many beautiful village communities in rural parishes outside SDNPA, why should they suffer from the impact of new developments?

we have taken too many houses so far

Too many houses

Overcrowding

Other comments

All SDNPA housing should be covered by the SDNPA plan.
I needs to the kept for future generations
As above. I think we need to focus on the LPA and get that right first
Can't keep the SDNP in aspic
But it all depends on where you put them. It should not be on Sounth Downs national park land
Housing should not be planned on South Downs national park. This land must be protected for future generations. We can use the land around it without gradually chipping away at this land until nothing is left for all us to enjoy.
SDNPA takes up the biggest area of land in East Hants
We are already doing this. It is not sustainable. We will be forced to bin this plan within the ten year timeline set out, so why start off on the wrong basis?
We in Whitehill are not part of the SDNP.
A more imaginative approach needs to be devised to include new housing within the SDNPA which beautifully incoperrates these within this context.
We have for some years urged the Council to reduce housing numbers to take account of the fact that 57% of East Hampshire District is within the SDNP, and we have in meetings commended the terms of the letter of November 2021 from Cllr Millard to Michael Gove raising the inequity of applying to the rest of the District the numbers calculated by the standard methodology for the whole District. Now the SDNP would appear to be a "genuine constraint" for the purpose of the DLUHC Letter, so justifying a reduction in housing numbers for the rest of the District. We strongly support that approach, as indicated in the consultation document. The approach is further justified by the fact that housing need targets do not apply to national parks and so the designated landscape is not threatened by housing development to meet more than locally established needs. A further issue is that a significant part of the local plan area falls within sites designated as of international or national importance for biodiversity, and/or is Valued Landscape. We consider that these are also a "genuine constraint" which would justify a reduction in housing numbers. Conclusion on housing numbers The Council will need to take advantage of the change to advisory housing targets and a likely move to using up to date household projections to adjust proposed housing numbers so as to meet established local needs. The Affordability Ratio needs to be challenged in the context of East Hampshire. The numbers also need to take more account of the high-quality character of the local plan area, and the reduced availability of land for development when constraints resulting from designated biodiversity sites and Valued Landscapes are taken into account.
CPRE has for some years urged the Council to reduce housing numbers to take account of the fact that 57% of East Hampshire District is within the SDNP, and it has in meetings commended the terms of the letter of November 2021 from Cllr Millard to Michael Gove raising the inequity of applying to the rest of the District the numbers calculated by the standard methodology for the whole District. Now the SDNP would appear to be a

"genuine constraint" for the purpose of the DLUHC Letter, so justifying a reduction in housing numbers for the rest of the District. We strongly support that approach, as indicated in the consultation document. The approach is further justified by the fact that housing need targets do not apply to national parks and so the designated landscape is not threatened by housing development to meet more than locally established needs. A further issue is that a significant part of the local plan area falls within sites designated as of international or national importance for biodiversity, and/or is Valued Landscape. I consider that these are also a "genuine constraint" which would justify a reduction in housing numbers. Conclusion on housing numbers The Council will need to take advantage of the change to advisory housing targets and a likely move to using up to date household projections to adjust proposed housing numbers so as to meet established local needs. The Affordability Ratio needs to be challenged in the context of East Hampshire. The numbers also need to take more account of the high-quality character of the local plan area, and the reduced availability of land for development when constraints resulting from designated biodiversity sites and Valued Landscapes are taken into account.

POP3 Based on the above should we meet

All the housing needs of East Hampshire's part of the SDNPA, or
None of the housing needs of East Hampshire's part of the SDNPA, or
Some of the housing needs of East Hampshire's part of the SDNPA.

POP3a Please explain your answer

Explanations from those who didn't select an answer but provided a response.

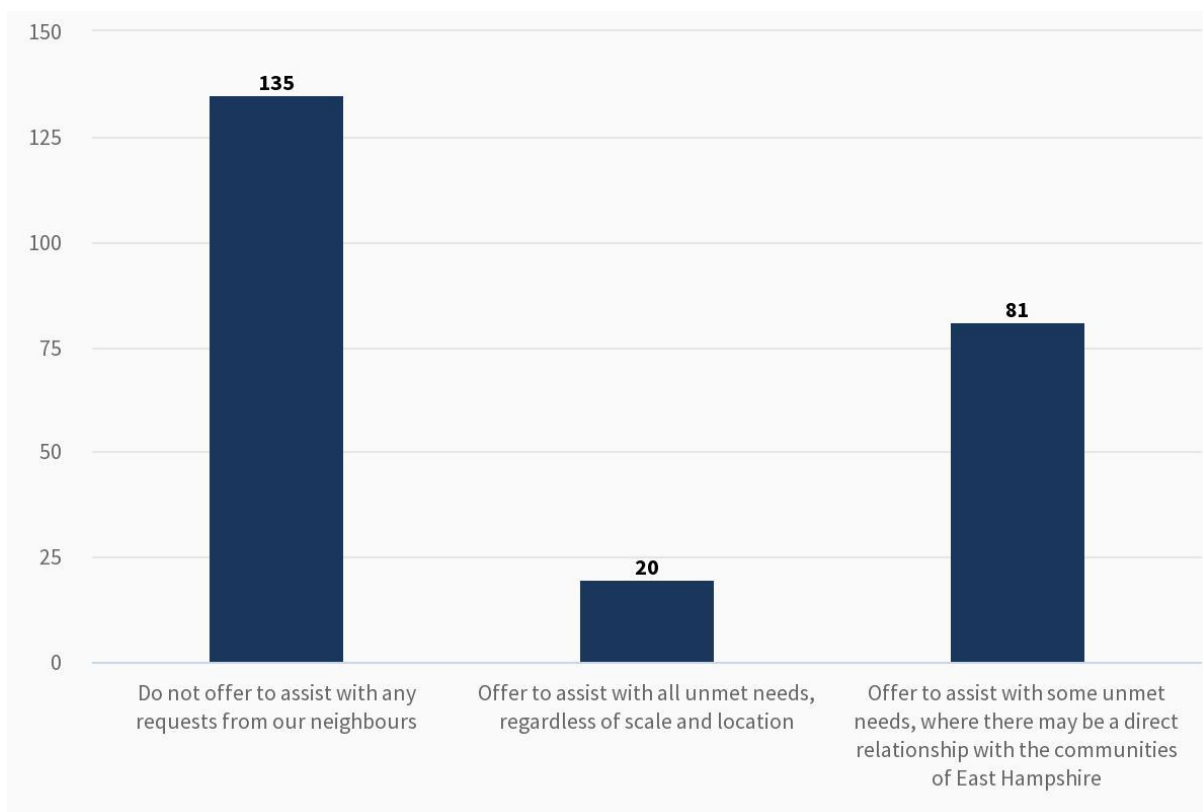
Not part of SDNP
We do not really understand this.
Hopefully the EHDC Leader's letter to Mr Gove will define the need.
In order to survive all communities need some new housing; the villages of SDNP can easily manage their allocated figure of 115 (as opposed to their current 100).
As previously stated. Also planning department for non SDNP is based in the SDNP, at Petersfield. So there is a bias.
I wish someone had written this question in English rather than planning speak. I have zero idea what the question is asking.
It depends how you define "needs"
Do not interfere with the National Park. EHDC should stick to its own territory.
There is need for new housing within SDNPA as there is with every other authority. Whilst conserving the natural beauty of the national park is important, it should not be placed above the need for new homes.
We can only take on the board the needs of housing in the SDNP by sacrificing our own beautiful and irreplaceable countryside, which would destroy the point of living in the non-SDLP part of East Hampshire.
As the consultation document at page 24 is clear that there is no new evidence that justifies any change to the existing approach agreed in the Statements of Common Ground between the two authorities.
Settlement areas, such as Liphook, that are split between the two authorities need to be assessed for housing needs as an entity to give a balanced development about the centre of the community and avoid distorting the established shape of the settlement. A fourth alternative option should allow for development within one of the authorities (say SDNP) to be set against the numbers for the other authority (say EHDC), not as an addition to the EHDC numbers proposed. The three alternatives given above do not allow for such variations to be made for settlements with the problem of dual planning authorities.

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

Offer to assist with all unmet needs, regardless of scale and location, or

Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire, or

Do not offer to assist with any requests from our neighbours.



135 respondents (57%) selected 'Do not offer to assist with any requests from our neighbours'.

20 respondents (8%) selected 'Offer to assist with all unmet needs, regardless of scale and location'

81 respondents (35%) selected 'Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire'

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

Offer to assist with all unmet needs, regardless of scale and location, or

Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire, or

Do not offer to assist with any requests from our neighbours.

POP4a Please explain your reasons

Explanations from those who selected 'Offer to assist with all unmet needs, regardless of scale and location'.

Capacity

It is considered that the district has the capacity to accommodate additional development to assist in the delivery of housing to satisfy the unmet needs of neighbouring authorities.

The letter to EHDC from the Minister of Housing dated 5 September 2022 stated that Duty to Co-operate will be replaced with a more flexible Alignment Test and that this will ensure that cross boundary working remains important. Within the consultation draft of the NPPF, at (new) paragraph 67, it states that the (housing) requirement maybe higher than the identified housing need, if it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Given that the overall housing need is, and has been for some time, a starting point from which a housing requirement is generated with reference to the capacity of an area to absorb development without harm to important landscapes, biodiversity and physical and social infrastructure, then it is considered that the starting point has to be a willingness to assist with all unmet needs from adjoining authorities. Whether there is sufficient capacity in terms of deliverable sites to deliver that level of additional development will of course flow out of later stages of the plan production, but not to attempt to try would risk predetermining that latter stage at this point. East Hampshire is arguably more readily able to absorb development compared with more highly constrained neighbouring authorities, so not offering to assist with unmet need means that need not being met anywhere. This means the area continuing to suffer from suppressed household formation, which in the long term will affect the economic wellbeing of the local area and wider region, as well as people's quality of life.

Duty to co-operate / work together

Should work together
Of course helping other boroughs and working together is paramount for a better solution.
Yes we should work together, this works both ways
Duty to Cooperate.
Belport note that the options that have been identified in question POP4 may not be entirely consistent with the Council's statutory obligations in respect of the Duty-to-Cooperate. To be compliant with the Duty, the Council should continue to engage on an ongoing basis with neighbouring authorities to understand the scale of any unmet need. Once that need has been identified the Council should then assess the capacity of the district to accommodate some or all of that need. As such the Council should not take a policy decision at this early stage in the plan making process as to whether or not to accommodate unmet needs from neighbouring authorities. That decision should be based upon evidence as to whether there is capacity to accommodate unmet need. It is acknowledged that the absence of a full understanding of the scale of potential unmet needs from neighbouring authorities make progressing the plan difficult. To ensure that the progress of the Plan is not delayed pending a better understanding of unmet needs from neighbouring authorities, it is recommended that the Council explore if a notional higher housing requirement can be accommodated in the district. It is suggested that an additional 20% (which comprise an additional 106 dwellings, taking the requirement to 638 dwelling) would be a reasonable starting point. This high requirement should be included as a reasonable alternative in the Sustainability Appraisal.

Housing need

There is a collective housing crisis we need more homes.
It seems certain that many neighbouring and nearby authorities will have unmet needs which will need to be accommodated elsewhere, to avoid a worsening housing supply crisis. It is therefore imperative that EHDC starts planning for this now.
The Housing Needs and Requirements Background Paper identifies that there are unmet housing needs arising from the Partnership for South Hampshire (PfSH) area, and that Havant and Chichester district councils have already approached EHDC about accommodating unmet needs. With regard to Havant, it is notable that the Local Plan was withdrawn from examination in March 2022, and that the authority cannot demonstrate a five-year housing land supply. It also failed the Housing Delivery Test. Similarly, Fareham Borough Council cannot demonstrate a five-year housing land supply, and also failed the Housing Delivery Test. It therefore seems certain that many neighbouring and nearby authorities will have unmet needs which will need to be accommodated elsewhere, to avoid a worsening housing supply crisis. It is therefore imperative that EHDC starts planning for this now.

Other comments

East Hampshire is part of the south east where the country's largest percentage of the country population live and work. Every one should have space and decent homes by allowing the opportunity to move to areas where housing densities are lower.

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

Offer to assist with all unmet needs, regardless of scale and location, or

Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire, or

Do not offer to assist with any requests from our neighbours.

POP4a Please explain your reasons

Explanations from those who selected 'Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire'.

Capacity

It should be accepted that a number of the settlements within EHDC are well located to serve adjacent districts.

Havant is very high density housing. We do not want that density to spread into East Hampshire, but some border areas may need to take a little more housing where a community is split between two authorities.

There are some LPAs locally which do not have the land available to meet their own housing needs, such as LPAs with a lot of Green Belt and AONB designations, and they struggle every year to meet their housing targets. One solution to this problem would be to allocate some of their much needed housing numbers to locations with fewer policy and environmental constraints, such as East Hants, which has no Green Belt, for example. East Hants should approach neighbouring authorities, especially those nearer to London, which have a considerable amount of Green Belt, to see if any of their housing need can be accommodated. There is even a case for taking some overflow from London, where the housing need is the highest and the housing shortfall is the greatest in the UK. We don't believe that the LPA should offer to meet all unmet needs, with no limit, because that would place too much pressure on local services and infrastructure, but it should be possible to meet some of the needs of highly constrained LPAs. The LPAs that benefit from this should help to pay for the improvements to infrastructure that will be required to facilitate what should not necessary be seen as a wholly altruistic offer.

Duty to Co-operate / work together / balance

Duty to cooperate.
Needs to be two way street
We should help with unmet needs, but not if the reasons are similar to our reasons
consideration should be made if and only IF its justified and not political.
I believe that EHDC have a statutory need to cooperate with other Authorities, as do they. This should happen but should be associated to adjacent communities.
Communities on the borders of the district live and work in harmony and there is a case for some reciprocal planning. It should be a two way street. The land between Bentley and Farnham is a case in point.
We want to support our neighbouring areas but need to also protect the individual communities of East Hants that already exist so that they don't become absorbed into some greater whole that removes the distinctive character of any area.
Be a good neighbour and offer to help within reason but really Basingstoke should be able to support more medium-density, multi-storey housing. Perhaps they could help us preserve our green space.
District boundaries are arbitrary and many communities and how people live their lives may transcend district boundaries: this may be particularly true in the south of East Hants where areas like Hordean etc swiftly merge into Waterlooville etc. In such examples, I can see the logic in collaboration (without really being clear what the impacts of that collaboration might be or mean). it cant just be house building. It has to include infrastructure and services etc.
Co-operating with neighbouring Authorities is good planning
Again - difficult to answer such a broad question - if you mean, should E. Hampshire offer to help with the housing needs of neighbouring areas, surely that would depend on why they need help (is it an environmental issue, a financial issues, a space issue?) and what the impact of helping is on E. Hampshire. But being open to help is important - and the help should be reciprocal
I believe Government policy is to assist neighbouring districts/ boroughs/ communities
It has been proposed to remove this requirement when Robert Jenrick looked at planning reform. As things stand we need to be good neighbours as we might need help and cooperation from our neighbours.
We and our neighbours have similar problems, compounded by the strictures of SDNPA. We should be in a symbiotic relationship.
We have to have a balance with our natural environment. Cannot ignore neighbours but also cannot afford to meet all their needs
There must be a balance and not all in one area

We cannot refuse all requests for assistance, but it must be very limited.

This option is supported with the presumption that it may apply in reverse to cater for EHDC's current housing needs. This helps to resolve the problem of when settlements are bisected by District/Borough boundaries.

I understand that SDNP is revising their local plan and may need to locate housing in Liphook to fulfill their numbers. However meeting the needs of another authority should not be a one-way relationship that imposes more housing on a split settlement without taking account and possibly reducing the numbers calculated by EHDC for that settlement.

Housing need

People have to live somewhere and where our communities and neighbouring communities have common needs, they can help each other

The word "need" is defined in terms of an arbitrary formula that does not relate to the actual situation on the ground

Type of housing

It is reasonable for East Hampshire to assist with meeting some unmet need in South Hampshire, but only for affordable housing for younger residents of East Hampshire who work in South Hampshire so they can live in the communities in which they grew up. I do not support an increase in non-affordable executive homes in East Hampshire.

Economy

As well as the requirement to provide new homes, it is also important to sustain economic growth within the District, so it would be practical to provide new homes which will support the District's economy.

As long as local employment and walk, scoot, ride rules apply.

IF there is building plots that add value to the local economy / environment then yes - some consideration should be made if there is spare space in our area

Environment /infrastructure

Discussion is always better than taking a stand. HOWEVER - we have our own issues such as sewage disposal which is not being met today by Southern Water. All additional housing has to stop until such time as Southern Water meets the demand without polluting the rivers and the sea.

Providing the neighbours agree to an infrastructure spend, like for example a Guildford and farnham Bypass that enables better road communitons out of our area.

This should reduce carbon footprint.

Community benefit

If such schemes benefit local residents, this should be explored

If there is benefit to local people with a limited number of other houses from other area quota then if communities agree this is not a problem.

Engagement

All aspects of development should be discussed with the local community

The democratic processes require discussion, not isolation.

Other comments

Seems ok to me.

This will need to be assessed on a case-by-case basis

seems reasonable

and seek support from them

More specific information needed.

As we have many neighbours it seems unreasonable to assist in all unmet needs. As a rural area we could become overwhelmed with housing if trying to help all. Prefer no assistance unless considered necessary

These should be considered on a case by case basis, looking at local communities rather than absolute administrative local government boundaries.

Allows scope for EHDC to negotiate level of assistance.

A reasonable half way house

This option offers a compromised position which is achievable and not prevent progress by being too wide a proposition like the first option. Priority should be to EH and direct relationships in the first instance.

Provided East Hants has control of the plans

It seems unwise to take on needs from neighbours in general, but there may be specific circumstances around the borders.

In the past the main neighbour with unmet need has been the PfSH authorities. As acknowledged, the amount of any unmet need from PfSH is not yet known. The move to advisory housing targets only increases the uncertainty, and the proposed removal of the Duty to Co-operate may colour the Councils approach to taking homes from the south Hampshire planning authorities. In fact, the 2021 census data shows numbers of households in south Hampshire to be significantly less than projected in 2014, including Eastleigh, Fareham, Gosport, New Forest and both cities of Portsmouth and Southampton. The consequence is that demand for housing in the PfSH area should be much reduced which, along with a focus on brownfield sites within the urban area for reasons of carbon neutrality, means that any requirement to accommodate housing from PfSH should be unnecessary, and unjustified. Accordingly, no allowance for PfSH not meeting its own requirements should be made, but there may be a case for taking some houses if residents of the southern parishes would benefit thereby and brownfield sites can be found.

PfSH formally agreed to enter into a Statement of Common Ground (SoCG) between the ten member authorities in September 2020. The first iteration of the SoCG was published in October 2021 and set out an anticipated shortfall of 12,896 dwellings across all ten authorities for the period 2021-2036. PfSH are currently in the process of updating their SoCG, in which the 2022 revision sets out an unmet need of 19,865 dwellings for the period of 2022-2036. This clearly demonstrates that there is anticipated to be a significant unmet within the PfSH area of nearly 20,000 dwellings by 2036. However it is also important to note the increase in the estimated unmet need between the publications in October 2021 and November 2022, where the unmet need increased by approximately 7,000 unmet dwellings in a one year period. This therefore indicates that the situation is worsening rather than improving, and it is more important than ever for authorities within the PfSH to accommodate more unmet need. Furthermore the latest publication from PfSH it is recognised that only two authorities in the area (Fareham and Test Valley) are currently able to demonstrate a surplus in housing supply between 2022 and 2036, with Winchester currently showing as breaking even. Whilst it is only a snapshot at the current time, it reflects that there are limited opportunities within the PfSH area to provide the unmet need. It is therefore imperative that the local authorities which are able to assist with the unmet need from the PfSH area look to do so. In response to question POP4 Grainger feel that EHDC should offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire. This is particularly in relation to the southern areas of the District which are part of the PfSH sub-area.

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

Offer to assist with all unmet needs, regardless of scale and location, or

Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire, or

Do not offer to assist with any requests from our neighbours.

POP4a Please explain your reasons

Explanations from those who selected 'Do not offer to assist with any requests from our neighbours'.

Data/ accuracy

Because like all such figures they are based on an unrealistic and probably excessive estimate of unmet need
Our standard method targets are artificially inflated and too high already. Why should EHDC meet the unmet needs of other LPAs ? How about they meet some of our upweighted targets (not needs) ?
There should be a clear calculation as to need and the reasons why the neighbours cannot meet the need together with how there is a direct relationship with East Hampshire communities.
See my previous responses - wait and see if the government changes its stance so that targets are no longer mandatory in which case all neighbouring authorities can concentrate on satisfying the need identified by household growth without the need to build an excessive number of new houses.
Because the total numbers are unnecessarily inflated. All of the stated 'need' comes from net inward migration
My reasons have been stated above but housing need should be calculated on demographic need not based on the affordability ration which is flawed
Our housing number expectations are already excessive. I explained in POP 4 why the neighbours needs should be met. The calculations are based on their need and not ours.
As above, we need to stay focussed and avoid dilution of targets elsewhere in case it leads to pushing unmet need around
We have no brownfield land. We are a predominantly rural area. We have only 30% of land nominally available for development given the protected heathland and presence of the SDNP. The calculation of 'need' is considered to be flawed - please see answer to Pop 1. But I can repeat it here: It is considered that the HEDNA housing split is fatally

flawed and based on unsound methodology and a suggested revised methodology is below. The 2022 HEDNA gives us a 632p.a. housing need split between 115 (SDNP) and 517 (LPA). The way the split is calculated is considered to be fatally flawed and use unsound methodology because it projects future housing need in both areas by extrapolating the household growth seen in 2011-2020. This growth merely reflects the building of houses so is a function of planning approvals and nothing else. So as a measure of actual growth it is artificial. Not only that but in the years 2011 2020 the SDNP was explicitly not building to meet its own housing need in the district, and the shortfall was being picked up by the LPA. So, the growth figures for the LPA are artificially skewed by the inclusion of the SDNPs unmet house building needs, and the growth figures for the SDNP are not a true reflection of SDNP need because they weren't meeting their need. A fair share split of the 632 p.a. between the SDNP and LPA would be on a straightforward population ratio basis: 174 p.a. (27.5%) in the SDNP and 458 p.a. (72.5%) in the LPA. The rationale for this is that the entire district is a single Housing Market Area (as acknowledged on page 2 the 2022 HEDNA) and so the true housing need must be spread broadly evenly across the SDNP and LPA areas. We should ask our neighbours who don't have the exceptional circumstances that we are labouring under to assist us i.e. Waverley, Hart, Basingstoke & Deane, Eastleigh.

PeCAN suggests that any offers to assist neighbours with their unmet housing needs be limited to considering only their demographic needs, not their housing target based on market signal uplifts. If the unmet needs at neighbouring LAs have been calculated using affordability uplifts for market signals, they are likely to overstate the demographic need because the targets will have been artificially inflated to reflect the market signals uplift in the Standard Method (see answers above). The benefit of helping neighbouring LAs would thus be administrative, allowing them to comply with centrally set targets rather than meeting actual demographic housing needs, while the environmental costs for East Hants in building more homes would be very real and not justified by any actual housing need. Given the recent announcement from the government to move away from mandatory housing targets, this should be an opportunity to focus on the housing that is needed while preventing environmentally harmful over-construction.

Overdevelopment / sufficient development

Much of East Hants is already over-developed. In any case, centrally-determined housing targets are now flexible.

All this section is focused on explaining why we suffer from over development and to add to that pressure by accepting demand from neighbours is not supporting the needs of the EHDC residents.

Many parts of the district have already overcontributed in terms of housing, very often without related infrastructure or regard for the character of the original villages, to add more would be irresponsible.

It will be difficult to cope with further developments in small communities such as ours without the burden of providing extra development sites because our large neighbours, particularly Havant, cannot plan effectively themselves.

Why do this when the non NP area would have even more houses built. Enough is enough.

For the same reasons as above, the area has already taken an unfairly large share of the housing quota.
We are having enough development as it is
Housing density outside the SDNP is already high for this type of semi-rural area
enough houses planned/built in the area
EHDC has already ruined several villages and towns in its area by building too many houses
We have far to much development already.
Too many buildings already
I believe that East Hampshire has more than enough houses and most certainly cant offer to take on the building of more houses from some of the surrounding districts.
we have already taken too many new homes
We already have enough houses
Already at saturation point
Many areas in EHDC are oversubscribed, and EHDC should be asking other authorities for assistance. We have in this area urbanisation, NOT communities
rural areas and villages need to be protected and kept local for local people and not overpopulated
I refer only to the southern area of Horndean/ Rowland's Castle where there is the potential for over development and coalescence with Havant
For the Southern Parishes, the numbers for the PfSH revised housing figures are unknown. The Southern Parishes have seen a substantial amount of development. Development should be sustainably dispersed around the District but not forced on an area where there are local constraints.
If we offer to assist, the likely result seems that Horndean, in particular, will become enormous with most of the development being small low-cost housing. This will fundamentally alter the character of Horndean and the whole area roundabout. Looking to the future, large developments of small older houses are not necessarily attractive places to live, particularly if the housing is not good quality or well-maintained.
The southern parishes of Clanfield/Horndean have taken significant housing and the settlements now merge together alongside neighbouring Havant Borough settlements and those within Portsmouth City Council. There is no distinction between the settlements. We should not be fulfilling the needs of densely urban areas within PfSH.

Struggle to meet own housing needs

We have difficulty meeting our own needs. EH needs sensible numbers to avoid over delivery and building houses in the wrong place. There is only so much land in EH we need to be prudent & protective of our green spaces
We cannot meet our own needs, there are not suitable sites available
EHDC are hard pressed to find their own development sites without adding more from other districts. Why does levelling up mean the SE has to take on more?
Basically, I would suggest that we are struggling to meet our own needs, as EHDC couldn't resolve this issue in 2019, when they had the previous second round of Consultation 18, looking to find suitable locations for these needs the Council selected sites i.e. Northbrook Park and then Chawton Park Farm, which were for some reason then dropped and we were back to square 1!
It will be difficult enough to absorb our own housing needs
We are struggling to find suitable areas in East Hants
EHDC is finding it very difficult to find space for the housing requirement it has let alone finding space for other districts unmet housing numbers
EHDC are struggling to find enough space for it's own housing requirement so MUST NOT agree to take homes from our neighbouring LPAs.
EHDC is already struggling to find suitable sites for its own requirements without devastating beautiful areas. We should not be seeking to make our own problems worse. All areas should have to cope with their allocation.
EHDC cannot support the needs of its own district let alone other areas.
The highly vocal resistance to currently proposed development sites demonstrates the difficulty East Hampshire will have in meeting its own housing targets. Taking on the burden from neighbouring communities will lead to significant resentment
No room for any more housing.
We have quite enough to cope with ourselves, much though I feel for the problems experienced by our neighbours.

Infrastructure / environment

our own requirements will put enough strain on resources and people
Neighbouring areas have better infrastructure and good opportunities for urban renewal
We have more than we can cope with already. Infrastructure is insufficient
Once we start, those areas may take for granted our willingness to take even more houses. They will not be funding the extra infrastructure needed.

There are enough problems in the Southern Parishes due to a lack of supporting infrastructure and services for the existing population without trying to include even more development to assist neighbouring districts.

Medical, educational and other infrastructure can't cope in East Hants. Please keep the plan local.

I am concerned about the water supply in the district

The infrastructure around Alton and Four Marks has been exceeded. Bentley to Farnham has unused infrastructure.

The infrastructure around Alton needs major improvement

Total lack of infrastructure. Lack of affordable housing for local people.

We are already overwhelmed with new houses. Our doctors, dentists and sports facilities are over-subscribed.

Loosing too much open space

We have enough battles to preserve our community countryside and rural area.

We are already taking a lot more houses in Alton, South Medstead and Four Marks and Bordon than local infrastructure will support and to help with requests from neighbours would require the sacrifice of our beautiful countryside landscape.

Clarification

We need to know what we are being asked to take and why before committing to it.

This seems a very technical issue and difficult to express in concise plain english. In this absence I therefore prefer this option.

this is a ridiculous question how can this be answered without any evidence to consider the implications,

Meet own housing needs / South Downs National Park

The SDNP need to assist East Hampshire not the other way around

Each sub region must plan to provide their full share of the allocations

Our neighbours need to take care of their area

East Hants should focus on meeting its own unmet housing needs and not those based on market signals uplift

It should be the towns outside of the SDNP that ask for assistance and seek help from the SDNP, so that they can takes some of the housing and relieve pressures on those outside of the National Park.

We should meet all of our own housing needs and not expect neighbouring LPAs to deal with our needs. Likewise, they should not expect us to help with their needs.

They need to revise their housing needs down as well

Actual need and housing types need to be considered in relation to existing stock

Let us put our own house in order and allow our neighbours to do the same.

Our existing approach with SDNP prevents us from supporting neighbours when we otherwise might look to.

each area should take on the APPROPRIATE number

The neighbouring districts should have suitable plans to meet their own housing needs.

Any offers to assist should only consider their demographic needs. Considering the government's move away from mandatory housing targets, this should be an opportunity to focus only on housing that is needed.

It would seem that the Levelling-Up & Regeneration Bill will remove the duty to co-operate with neighbouring LPAs. In any case, LPAs with brownfield sites should be the ones offering help to neighbours. East Hampshire doesn't have much in the way of brownfield sites, so any unmet needs of others would only be met by even more greenfield development in East Hants, which is not acceptable. In fact, if the SDNP continues to fail to take its fair share, it is some of our more urban neighbours, with more brownfield sites, who should be meeting some of East Hampshire's housing need.

Other Districts and Boroughs should meet their own housing needs, it is not fair or realistic for East Hants to take on housing pressure from other areas. What local authorities need to do in the SE is band together and tell the government enough is enough. The South and East of Britain takes many more homes than the rest of the UK put together. It is no longer sustainable. Governments should provide jobs, economic incentives and regeneration in the Midlands and the North to allow those communities to thrive rather than being economically depressed (some have never recovered since the 80s). This used to be the case with Govt macro economic policy in the mid 20th Century. The laissez faire attitude for housing and planning no longer works and urgently needs reform.

Geographical area

Highlights the stupidity of planning being at district council level. It should be at county for scale. If it was with county then the impact of SDNP could be mitigated across a wider area/ population.

EHDC's "area" - ie net of SDNP - seems to me too small to provide critical mass. I suggest EHDC's planning powers are transferred to or delegated to, the SDNPA, which does have size and scope for critical mass.

Other comments

From our perspective in Alton, we already have enough problems of our own.
Developers need to be better informed
POP3a and 2a provide answers to this
We have enough problems of our own
There is no housing need elsewhere either
no more greenfield building here in East Hants
We have enough going on
EHDC has issues that aren't being tackled, so why exacerbate this issue by taking on more development than is absolutely necessary. when do our neighbouring boroughs ever help us?
There is no obvious benefit in offering such assistance
it's hard enough planning with SDNP without adding more variable. Let them negotiate with SDNP.
If they can't find somewhere to build houses why should Hampshire?
Is it reciprocal? It is EHDC that will need the help if the Bordon project is anything to go by
Would they help East Hampshire ?
We may want help from them to meet our need!
We are in the same boat as them. Will they take ours?
As previous put we can't put any more housing until other parts are sorted first
Why should the district build more houses than required, just to help other areas? EHDC is a mainly rural district whilst many of the neighbours have much larger towns/cities/suburbs, where additional housing should be built, rather than in more rural areas.
AS a predominantly rural area I do not believe there is a potential to cover our neighbours excess housing needs.
EHDC is largely a rural community with few large towns and employment centres. EHDC should not allow neighbouring area which have different demographic and employment needs to export their housing needs to an area that cannot meet these. Doing so would in any case be contrary to the earlier objective of siting houses close to work. Assisting requests from neighbours would increase commuting to work
Fix East Hampshire, before fixing adjacent areas

Lets make sure all parties have looked imaginatively at every option before jumping in to continue "business as usual." There is a need for new approaches.

In the past the main neighbour with unmet need has been the PfSH authorities. As acknowledged, the amount of any unmet need from PfSH is not yet known. The move to advisory housing targets only increases the uncertainty, and the proposed removal of the Duty to Co-operate may colour the Councils approach to taking homes from the south Hampshire planning authorities. In fact, the 2021 census data shows numbers of households in south Hampshire to be significantly less than projected in 2014, including Eastleigh, Fareham, Gosport, New Forest and both cities of Portsmouth and Southampton. The consequence is that demand for housing in the PfSH area should be much reduced which, along with a focus on brownfield sites within the urban area for reasons of carbon neutrality, means that any requirement to accommodate housing from PfSH should be unnecessary, and unjustified. Accordingly, no allowance for PfSH not meeting its own requirements should be made, but there may be a case for taking some houses if residents of the southern parishes would benefit thereby and brownfield sites can be found.

Districts to the north have problems building on their designated Green Belt Land. Large tracts of Green Belt have little or no particular environmental attributes that would justify development being withheld. Indeed brownfield land, derelict industrial sites and the like are often impossible to re-develop if they are in a Green Belt. EH should not offer to permit development in its area which is of equal, and possibly much greater environmental value than land within the Green Belt just to maintain Green Belt designations that have doubled in the last 40 years and were, in any case, established to limit the growth of cities rather than protect landscape. Green Belts are long overdue a re-assessment and that should be done urgently. In the PfSH area a similar situation arises with coastal towns and cities with excellent road and rail links are resisting densification and are tending to look to their neighbours to the north to provide their housing needs rather than re-develop and densify their locale. EH should resist this approach if it materializes.

We need to be aware that Hampshire could seek to have an unmet need and accommodate this within neighbouring areas.

Any assistance with unmet needs could result in increasing coalescence eroding the separate identities of East Hampshire communities, particularly in the Southern Parishes.

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

Offer to assist with all unmet needs, regardless of scale and location, or

Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire, or

Do not offer to assist with any requests from our neighbours.

POP4a Please explain your reasons

Explanations from those who did not select a response but provided an explanation.

Whilst the precise amount of unmet need is still to be agreed, given the timescales for the adoption of this new Plan (2025) assessing and planning for the level of unmet need through Statements of Common Ground between the relevant adjoining authorities will be very challenging within the timescale irrespective of the numbers involved. The scale of the challenge is also great. Stagecoach is aware from our participation of the City of Winchester Local Plan consultation that PfSH formally agreed to enter into a Statement of Common Ground (SoCG) between its ten member authorities in September 2020. The first iteration of the SoCG was only released in October 2021 and set out an anticipated shortfall of 12,896 dwellings across all ten authorities for the period 2021-2036. PfSH is now of the view in its latest work that there exists an unmet need of 19,865 dwellings for the period of 2022-2036: a 54% increase. The wider situation is worsening rather than improving, and it is more important than ever for authorities within PfSH to try to accommodate more unmet need if they can realistically do so. This is not simply a matter of ecological and other constraints. It is crucial that these needs are met closest to where they arise, as far as constraints allow, to avoid exacerbating energy- and carbon-intensive patterns of movement. Not to meet these needs in such a way also exacerbates house price gradients leading to ever longer journeys especially for key workers in the service sector who are most affected by affordability issues with housing. In recruiting and retaining staff across the South of England, Stagecoach is itself faced directly with the consequences of high housing costs in staffing its operation while maintaining a cost base that is sustainable. We therefore would expect to see if there is any scope to make a realistic contribution to help meet unmet need of the neighbouring authorities. If this is possible, this should be in addition to the standard method minimum requirement.

Yes we should work together, this works both ways

For Alton do not assist with any requests from neighbours. Carrying capacity reached

Some sharing of the housing load makes sense as opposed to following parish binary utter r

Reasonable expectations where borders are close

This is a two-way street, of course. What are EHDC`s neighbouring authorities offering to EHDC in way of help for areas in which EHDC will be struggling to meet quotas? This has to be determined at a very local level.

They will just take advantage of us without paying for infrastructure

Once we start, those areas may take for granted our willingness to take even more houses. They will not be funding the extra infrastructure needed.

Too much over development already