

Rt Hon the Baroness Taylor of  
Stevenage  
**Via email**

**Enquiries to:** Richard Millard

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**Date:** Wednesday 21<sup>st</sup> August 2024

Dear Lady Taylor,

Thank you for your letter dated 12 August and I note your quasi-judicial role as a minister. We are aware of the current consultation on proposed reform to the National Planning Policy Framework (NPPF) and other planning policy reforms, which East Hampshire District Council (EHDC) will be responding to in due course.

It is good to see that Government is committed to the plan-making system. I agree that it is the only way to plan for growth in a co-ordinated and sustainable way. As you state, it allows local councils and their communities to agree the future of their areas, ensuring development needs are met without jeopardising the natural and built environment. However, I believe that the proposed changes to the NPPF and particularly the proposed revision to the way local housing need is calculated is likely to have a detrimental impact on the 'plan-led' planning system within England.

As you state, the Government is clear that Councils should continue to plan at pace and not be paused in anticipation of the intended new system or policy changes. The significant increase in housing numbers does not account for places like East Hampshire that has 57% of its district covered by the South Downs National Park - a separate local planning authority. The data associated with the proposed standard method is not available at a local planning authority level. Although reference is made in your letter and the current consultation to further guidance for such circumstances, as drafted, the proposed standard method does not allow EHDC to actively progress its Local Plan.

Without clarity on how housing need is determined in places like East Hampshire, the local planning authority finds itself in a similar position to the current standard method. Your letter refers to the guidance on strategic policy making authorities that do not align with local planning authorities. This guidance is too vague and does not provide affected local planning authorities with a sound basis to provide an alternative. Within East Hampshire, such an ambiguous approach has led to the need to commission specialised consultants at the expense of the taxpayer in order to attempt to disaggregate the housing needs between

EHDC and the South Downs National Park Authority (SDNPA). The lack of clarity not only delays the plan-making process and increases the cost burden on EHDC, but also puts the Council in a vulnerable position at Examination as any alternative would likely be challenged for a wide variety of reasons that may or may not be significant, without details on what the alternative should entail.

The entirety of the South Downs National Park (SDNP) is already constrained, as outlined in footnote 7 of the NPPF. It is fundamental that the proposed standard method does not apply to such areas that are required to fulfil the purposes of national parks. The majority of the housing stock was built before the designation of the SDNP and therefore would represent an unrealistic basis for calculating local housing need in such areas. In addition, there needs to be clear guidance on those local planning authorities adjoining and thus affected by national parks. It is paramount that the NPPF and any associated guidance provides clarity on the circumstances in which an alternative approach applies and what that alternative would look like. Without it, a disproportionate amount of growth would be expected in such local planning authorities at the expense of the natural and built environments that act as the gateways for visitors to our national parks.

Overall, the significant increase in housing numbers, which do not adequately reflect the presence of the SDNP, will result in a delay to the adoption of a local plan for East Hampshire's planning area, as not only are more sites needed within a constrained rural area, but more evidence is therefore required to support any proposals. As mentioned, this will also come at a significant cost burden to the Council. Delays provide further opportunities for a considerable amount of speculative development on isolated sites without any supporting infrastructure, whilst the high housing requirement is likely to make it very difficult to maintain a sufficient land supply in accordance with national policy. A further consequence of the proposed changes to the standard method is therefore the likelihood of additional speculative development shortly after the adoption of a new local plan. These proposed changes threaten to make a mockery of having a genuine 'plan-led' planning system in places like East Hampshire.

Notwithstanding the above, I appreciate the need to revise certain aspects of national planning policy and would like to commend many other proposals within the current consultation. EHDC welcomes the changes to Green Belt policy, particularly those which relate to decision making as well as Local Plan preparation. For a long time, Green Belt policy has not been fit for purpose and it has allowed local planning authorities to resist appropriate development to meet housing needs. Similarly, a significant revision of planning fees has been long overdue. We also share the sentiments around the need for affordable housing and advocate the proposals that will see homes built that are genuinely affordable. EHDC also welcomes the proposals to be able to set realistic fees that would assist the decision-making process and speed up the time taken to determine applications.

I hope the above, along with EHDC's response to the current consultation, is given due consideration when considering the proposed changes to the NPPF and the standard method for calculating local housing need. It is extremely important to boost the supply of housing to meet the needs of residents with the right housing in terms of size, type and tenure, as well as providing homes that are affordable and suitable for different groups in the community. However, meeting these needs should not be at the expense of the natural and built environment, therefore, the amount of housing needed should be realistic. I urge the Government to reconsider its proposals and set out an appropriate alternative for places like East Hampshire, who are so impacted by another local planning authority that has such a restrictive status in its ability to meet its needs.

Thanks again for your response and the suggestion that support is available through the Planning Advisory Service (PAS), which we are currently actively seeking. In light of the relatively unique position within East Hampshire, I would also be pleased to send relevant officers to meet with officials and better explain the complex nature of a local planning authority that is impacted by the presence of a national park. This will help inform the amendments to the Planning Practice Guidance on the alternatives that you refer to that will accompany the final amendments to the standard method for determining local housing need.

Yours Sincerely,

A handwritten signature in black ink, appearing to be 'R Millard', written in a cursive style.

Councillor Richard Millard  
**Leader of East Hampshire District Council**