

**Response from East Hampshire District Council to the South Downs National Park
Authority Local Plan Review Consultation**

8th July - 16th September 2024

Thank you for the opportunity to comment on this early participation stage on the South Downs Local Plan Review. We have read the three associated documents and have the following general observations, before commenting specifically on the project initiation Document (PID), Local Development Scheme (LDS), and Statement of Community Involvement (SCI).

East Hampshire District Council consulted on a draft Local Plan 2021-2040 early this year. In your response to our Draft Local Plan (by letter dated 4 March 2024), you highlighted the following strategic cross-boundary priorities as a framework for future discussions:

- *Conserving and enhancing the natural beauty, wildlife and cultural heritage of the national park and its setting;*
- *Biodiversity restoration at all scales and making nature bigger, better and more joined up;*
- *Mitigation and adaptation to climate change, including nature based solutions;*
- *Sustainable travel into, within and across the National Park;*
- *The local economy and jobs particularly in land management and the visitor economy;*
- *New homes including accommodation for Travellers, focusing on affordable homes for local communities; and*
- *Green and grey infrastructure serving communities in and around the National Park.*

We endorse these priorities and wish to highlight some of the key issues in relation to housing, communities and infrastructure that emerged from our Draft Local Plan consultation 2024.

We received many responses, often raising concerns about the proposed number of new homes, and proposed sites for development. For a while now, there has been much local scrutiny of housing distribution across East Hampshire, and the impact of the South Downs National Park (SDNP) on where new homes are located.

Comments such as these were frequent in response to our consultation;

“While I understand why you might not want to build a large number of houses within South Downs National Park, it is still not clear to me why the SDNP allocation is then automatically transferred to the rest of East Hampshire. This feels hugely unfair on the local population and infrastructure which has not been set up to deal with such a large population increase over such a short period of time. While I totally acknowledge the importance of the SDNP, the other communities in East Hampshire matter too! Imposing these inflated and increased housing allocation on the sites outside the SDNP risks us losing the entire nature of our communities, our link to the countryside and our status as rural towns.”

Many of our residents and campaign groups feel strongly that areas outside of the SDNP are being targeted for more housing than they should, because of the constraints of the SDNP. This will be further exacerbated by increased mandatory housing numbers proposed by the Government, should they come into effect. Should these mandatory housing numbers be in place by Christmas 2024 (as the date referenced by the Government), the implications for East Hampshire are not just for the area outside of the National Park. For us to meet such high mandatory housing numbers, there will be more development sites and larger development sites in our Local Plan, with greater impact on the setting of the South Downs National Park (the geography of our district is such that it would be impossible to avoid such a scenario).

At a national policy level, we understand the level of protection given to the SDNP and the need to consider potential unmet housing needs arising from the SDNP. We continue to work closely to consider this through the Duty to Co-operate and Statements of Common Ground. We are grateful for your willingness to meet and discuss, and we wish to continue to do so as we both progress our new local plans. That said, there will need to be a new realism about mandatory housing numbers for East Hampshire – on which we would like to hold practical discussions as part of the Duty to Co-operate. Whilst we fully respect the constraints of the National Park, we consider that with these expected mandatory housing numbers, both our emerging Local Plans will need to make new considerations, different approaches, and look at realistic practical solutions (such as in Liphook – see further on).

With a national focus on growth (as referenced re mandatory housing numbers), and with many challenges to people’s health and wellbeing, we would like to see more recognition in the scope and focus of the SDNP Local Plan on the importance of housing and supporting communities now and in the future. We believe that failure to do so now could detrimentally impact the communities within the SDNP and East Hampshire as a whole. We note the question on the consultation platform; ‘Which issues are most important to you?’ – in response, we consider ‘affordable homes’, ‘health and wellbeing’, ‘vibrant communities’, ‘ageing population’ and ‘climate change’ to be the most important, but acknowledge the other issues too.

Whilst the National Planning Policy Framework (NPPF) gives great weight to conserving and enhancing landscape and scenic beauty in National Parks, it also notes that major development may be allowed in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Such consideration would be the need for the development, which includes national considerations, and the impact upon the local economy. The NPPF also recognises that consideration should be had for *“the cost of, and scope for, developing outside the designated area, or meeting the need for it in some*

other way". The National Park Authority needs to recognise that the larger the unmet need for housing within its area, the greater the pressure will be for additional housing development in adjoining areas - including on land in rural areas that form part of the National Park's landscape setting.

The two statutory purposes for National Parks are well known, but there is also a duty *'to seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes'*. The 2010 Circular notes that National Parks are homes and workplaces to thousands of people. There is emphasis that National Park Authorities should continue to foster and maintain thriving rural economies, as well as support the delivery of affordable housing.

It is clear that the communities of National Parks are critical to the sustainability of the Parks themselves and Authorities must ensure that, in their work furthering the National Park purposes, *"they give sufficient weight to socio-economic interests in order to fulfil their duties appropriately to sustain strong communities drawing, amongst other things, on the good work already undertaken and their shared aspiration to support thriving rural communities"*.

As part of the evidence base supporting the East Hampshire District Local Plan, when calculating local housing need, we have sought to disaggregate the outputs of the standard method to give a true representation of housing need in our local planning authority area. Whilst this work has subsequently given a number for those parts of East Hampshire that fall outside of the SDNP, we have been clear that it will be for the SDNPA to work through its own process as part of its evidence base to calculate local housing needs.

We support the 'bottom-up' analysis within the South Downs HEDNA (2023) that better reflects population growth and affordability ratios within the SDNP. As evident within the South Downs HEDNA, a higher number of people live within East Hampshire compared with anywhere else across the SDNP (33,335, 29.6%). Between 2011 and 2021, the population has increased by 1.9% in the East Hampshire part of the SDNP, which is second only to Chichester (2.8%). Over the same period, households have increased by 4.9%, which is more than anywhere else across the SDNP.

Taking the above into account, the local housing need within the East Hampshire part of the SDNP (106 dwellings per annum – dpa), is higher than anywhere else in the SDNP. This is representative of the large areas of population in East Hampshire's part of the National Park, which includes the market town of Petersfield and the large village of Liss. Overall, the analysis shows a need of approximately 350 dpa.

The South Downs HEDNA further analyses what level of housing would support more positive population and economic activity levels. This work shows that, in order to maintain the existing level of economically active population, then 276 dwellings per annum would need to be delivered. Due to the large number of people living in the East Hampshire part of the National Park and high levels of commercial activity in the area, it is fundamental that the South Downs Local Plan Review continues to meet as much of the identified need (106 dpa) as possible to not have a negative impact on the economy within the SDNP.

The South Downs HEDNA also usefully analyses affordable housing needs across the extent of the SDNPA. This analysis highlights that affordable housing need is greatest in the East Hampshire part of the SDNP at 105 dpa. The South Downs HEDNA concludes that

affordable housing delivery should be maximised where opportunities arise. This is exacerbated in East Hampshire where the affordable housing need is higher than all other areas.

The demographics highlighted in the South Downs HEDNA make clear a shift in age of the population and elements of decline. The SDNP is home to many people, and ensuring their quality of life should be a priority and considered in this Local Plan. PID P.6 social issues only touches on the health benefits of accessing the SDNP. There is potential to expand much further in that section of the PID.

We would like to see greater focus on the delivery of housing where appropriate, and infrastructure planning. As mentioned, there are key settlements in East Hampshire within the SDNP that need to be sustained and enabled to appropriately grow, such as Petersfield, Liphook, and Liss. Failure to do so now risks future social decline.

We are keen to see the SDNP Land Availability Assessment (LAA) when available, to review development opportunities. We would like the SDNPA to consider development opportunities not just from the point of view of the landscape impact, but also the needs and benefits of communities for improved infrastructure, to help sustain vibrant communities.

We would like to carry on our discussion with you about strategic growth at Liphook that is near the SDNP boundary. Similarly, we would welcome proposals for growth at the large market town of Petersfield, the large village of Liss, as well as other settlements in the SDNP. Growth is needed in such areas to support the provision of local facilities and services, as well as address housing needs, particularly for affordable housing.

Comments received to our consultation highlight the boundary of the SNDP is causing Liphook to grow in an unsustainable way, with development further away from key facilities and services. It is widely known that there is a potential large site to the west of Liphook within the SDNP being promoted for development, with the potential inclusion of a health care facility and improvements to the existing highway within the village. We would encourage the SDNPA to engage fully with us, the Integrated Care Board (ICB) and Hampshire County Council (HCC) highways to assess the merits of this site for future development.

We would also like to see every opportunity taken to consider brownfield sites, and appropriate extensions of key settlements. A recognition of the Government's growth agenda is recommended – national parks should not think themselves immune, otherwise they will face decline, with an increasingly old population and loss of key infrastructure, services and jobs.

Some of the key concerns arising from our Local Plan responses are around access to health care, education and transport, and concerns that development will further exacerbate existing problems. We would suspect that these concerns are shared by people living in the SDNP also. We engage with the ICB regularly and have to date channelled CIL funds into the extension of two GP surgeries in East Hampshire. We would encourage the SDNP to use this Local Plan Review to look carefully at opportunities for development to assist with improvements to health care facilities, and other key infrastructure. This is particularly important given the HEDNA shows an increasingly ageing population.

Table 4.10 of the SDNPA HEDNA shows age structure change. It identifies a 10.7% reduction in under 15s between 2011 and 2021, but a 22.2% increase in people age 65+ between 2011 and 2021. Therefore, we would like to see the Local Plan address this and consider the impact for local infrastructure such as schools and health care. How can schools be sustained? If they're not, what is the implication for families and how does this affect sustainable travel if children travel further to school?

Also related to retaining young people is access to affordable housing. We would like to see greater focus on the provision of affordable housing, which ultimately will need delivery of market housing.

We have worked together to commission an update to the Gypsy and Traveller Accommodation Assessment (GTAA 2024). That study identifies a need for Traveller accommodation in the SDNP (at least 12 pitches), when previously there had not been an identified need. There is also a need for Travelling Showpeople plots (9 plots). As such, as part of the Local Plan review, we would expect the SDNPA to carefully consider opportunities for expansion of existing sites, and new sites where suggested. Recent permissions demonstrate that there are situations where development for Gypsy, Traveller and Travelling Showpeople accommodation can be suitable within the SDNP.

We as a Council are concerned for all residents within East Hampshire and want the best outcomes and quality of life for all our residents. As such, we think the SDNPA Local Plan Review needs to grapple with day-to-day issues facing local communities and be clear on how it is planning to sustain communities and avoid decline. Whilst we recognise the priorities of the SDNP, the needs of the people who live in the SDNP should also be a high priority. This is a pivotal moment for planning, and an opportunity for planning to achieve growth and positive change, whilst protecting what makes a place special.

Project Initiation Document

The 2010 Circular highlights that the provision of support for commercial and business development is linked to housing, particularly affordable housing. The lack of affordable housing can have implications for the sustainability of National Parks and their communities. Demand for housing in the National Parks has consistently driven up the price of housing and development sites. Combined with relatively low wages in the local economy, a declining stock of council housing and only modest additions of new affordable units over the last 20 years, the consequence is that much of the stock is now beyond the reach of many local households. This can affect the social and economic diversity of rural communities and may, in some circumstances, undermine social support networks and the viability of rural businesses, which are key components of sustainable rural communities.

In terms of the SDNPA's Project Initiation Document (PiD), EHDC supports reference to social issues around housing, which includes affordability of homes in general and for those on low incomes living in the SDNP. We also welcome identification of the availability of the different types of homes and design of homes for adaptability and suitability over our lifetime, including for older people and people with disabilities, and maintaining vibrant communities.

However, despite the recognition of the above within the 'environment, social and economic overview', it is disappointing that such social matters are not included within the SDNPA

Corporate Priorities. Although we support the recognition of housing delivery as a key local matter, we note that completions have reduced significantly since 2020. Housing delivery in the East Hampshire part of the SDNP has not met the requirements established in Joint Core Strategy (JCS) or South Downs Local Plan (2019), which is something that needs to be addressed in the Local Plan review.

Similarly, we advocate the recognition of affordable housing delivery, but note past completions have fell significantly short of aspirations of both the JCS and SDLP. The SDNPA Monitoring Report states that in 2020/21 – 11 affordable homes were delivered (net), and in 2021/22 – 28 affordable homes were delivered (net). Since 2014/15, the figure has never been over 68, has been as low as 10, and on average has been 39. This also needs to be address in the Local Plan review.

Overall, the PiD is a useful starting point to show what should be included in the South Downs Local Plan Review, but there should be a greater emphasis on the social and economic factors, particularly the provision of housing, particularly affordable homes, varying in type and tenure to meet the needs of the population.

Local Development Scheme (LDS)

It is noted that the first Formal consultation on the Local Plan (Regulation 18) is scheduled for early 2025. National planning reform is noted in the associated PiD and the uncertainties associated with new system following the recent change in Government. We support a hybrid approach to the matter that allows progression on the Local Plan Review regardless of the future planning system that needs to be adhered to.

In light of the above, it is unclear how the current consultation and finalisation of the PiD will influence any Regulation 18 documentation, which will need to go through committee processes in advance of its consultation in early 2025.

Statement of Community Involvement (SCI)

We do not have any specific comments on the SCI. Elements of it may become burdensome on the SDNPA.