

EHDC Response to the Proposed Submissions South Downs National Park Local Plan - Regulation 19 Consultation (June 2026)

Thank you for consulting East Hampshire District Council (EHDC) on the South Downs Local Plan Review Regulation 19 Consultation.

We previously submitted comments to the Regulation 18 consultation in March 2025, where we raised significant concerns regarding the insufficient level of housing proposed to meet identified needs, risking further decline in local settlements. Having reviewed the Regulation 19 version, we maintain that the SDNPA could — and should — do more to enable the delivery of new homes and support job creation and the local economy.

This is not solely a strategic planning matter; it is a very real issue affecting communities across the National Park. Residents require access to genuinely affordable housing, and they rely on local services and facilities that can only remain viable — and prosper — with an adequate level of growth. We therefore urge the SDNPA to revisit the overall housing provision to ensure the Local Plan is both sound and capable of supporting sustainable, thriving communities. We believe this can be achieved whilst staying true to the purposes of the national park.

Until this is done, EHDC objects to the SDNPA Regulation 19 Local Plan.

Achieving Balance

As acknowledged in our previous response (Reg18):

“The National Park purposes are:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

However, the National Park Authority also has a duty, when carrying out these purposes, to seek to foster the economic and social well-being of local communities within the National Park.”

In light of this, we believe there is scope to achieve a more appropriate balance between the purposes and the duty it has when carrying out these purposes. At present, however, we do not consider that balance to be satisfactorily achieved within the current approach.

Why housing and local services are so important for the SDNP

Housing and commercial facilities are essential for sustaining local settlements because they provide the foundation for both daily life and economic activity. Without decent affordable housing, it becomes difficult for people to remain in an area long-term, leading to population decline and weakened local networks.

Commercial facilities play an equally important role by creating jobs and enabling access to goods and essential services. They stimulate the local economy by encouraging spending within the community and attracting investment.

Together, housing and commercial facilities create a balanced and self-sustaining environment. This integration helps settlements remain vibrant, economically viable, and resilient over time. This is so important for the future of South Downs National Park, and a key aspect we would like to see feature more in this Local Plan.

As stated, the National Park Authority has a duty when carrying out its purposes: *“To seek to foster the economic and social well-being of the local communities within the National Park.”*

We strongly believe that failing to fully action this would undermine the overall purposes of national parks. A national park that becomes a dormitory community dominated by older residents, or one that functions solely as a tourist destination, will significantly limit its ability to fulfil its duty. The Local Plan is the greatest opportunity the SDNPA has to influence this.

How much housing

HOUSING SUPPLY BY DISTRICT

Housing Supply by District	Windfall 16YRS	Completions 2024/25	SDLP Allocations	NDP Allocations	Permissions	New Allocations	TOTAL	Average Per Year
Adur	0	0	200	0	1	80	281	14.8
Arun	64	4	28	42	12	48	198	10.4
Brighton & Hove	0	0	0	0	64	0	64	3.4
Chichester	256	123	87	392	352	342	1,552	81.7
Eastbourne	0	0	0	0	0	0	0	0
East Hampshire	416	54	80	330	183	803	1,866	98
Horsham	32	3	230	0	20	80	365	19.2
Lewes	224	49	996	171	133	458	2,031	107
Mid Sussex	32	2	0	0	2	40	76	4
Wealden	16	2	7	0	3	11	39	2
Winchester	144	10	32	22	18	37	263	13.8
Worthing	0	0	0	0	0	0	0	0
Total	1,184	247	1,660	957	788	1,924	6,735	354

The significant increase in housing number for East Hampshire (Dec 2024) has had a substantial impact on our district, of which the SDNP is a significant part (57%). Being frank, there is more SDNP land in East Hampshire (57%), than there is under the control of EHDC (43%) as the local planning authority. The total population of East Hampshire is 125,700¹, the population of the South Downs National Park totals approximately 34,086² equating to

¹ 2021 Census

² ONS mid year population estimates

around 27%. In terms of housing stock, of the 56,040³ stock in the district, approximately 26.3% lies within the National Park. A 95% increase of the standard method housing number in East Hampshire was one of the highest percentage increases nationally, totalling 1,124 homes a year. This is not something the SDNPA can just turn a blind eye to.

Based on evidence⁴ relating to housing stock, the disaggregated housing need for EHDC LPA is 828 homes per year, equating to 14,904 homes over the plan period (2025–2043).

The SDNPA Local Plan Regulation 19 is proposing to provide 98 homes per year in East Hampshire. This is 98 of 1,124 homes, which equates to 9% of the total need, whilst having 57% of the land, 27% of the population and 26% of the housing stock. This places a disproportionate impact on EHDC, including on the SDNPA, as EHDC will need to allocate land that will likely affect the setting of the SDNP to meet its needs. It may be that sites around key settlements such as Petersfield would be better placed to provide housing and commercial uses, than sites on the edge of the SDNPA in East Hampshire.

The amount of development proposed within the SDNP would not meet parts of the vision or some of the strategic objectives identified within the Local Plan. This is a particular issue in East Hampshire with the lack of development proposed in settlements such as Petersfield, Liss and Liphook, comparative to their size. These locations are relatively high in population with key services, facilities, as well as good public transport links, which include mainline rail links to London and Portsmouth. Such sustainable locations should be targeted with more growth to protect and continue to provide for their social economic well-being and economic growth.

We note the inclusion of a strategic site at Liphook (SDA31). We support this allocation for 380 homes and a 65-bed care home, alongside the other proposed uses. Given Liphook's strong sustainability credentials and its identification as a Tier 2 settlement in the emerging East Hampshire Local Plan, we consider it an appropriate and logical location for growth. We note one additional allocation in Liphook for 8 dwellings. We encourage the continued allocation of sites in and around Liphook to help meet identified housing needs in a sustainable manner.

We also note the inclusion of 8 proposed site allocations in Petersfield totalling 224 dwellings. Petersfield is identified as a market town and is the second largest town in the SDNP, accommodating 12.5% of its population. EHDC supports allocation of land to meet development needs within Petersfield and neighbouring Sheet but notes the total proposed housing numbers are significantly lower than those identified in the Joint Core Strategy for the same area. The proposals are also lower than the 805 homes allocated in the Petersfield Neighbourhood Plan, which looked at a shorter period to 2028. It is considered more sites should be allocated within and around the settlement to fulfil the social and economic aspirations of the local plan and retain the vitality of settlements within the SDNP.

Alongside housing, it is also important that settlements such as Petersfield have opportunities for economic development and the delivery of community infrastructure to support thriving and sustainable communities, to help provide jobs and services to support new housing. Petersfield is home to, and attractive for further investment in, major

³ ONS 2025

⁴ Joint AECOM Assessment

employment sites - particularly offices and manufacturing, with constrained supply for further growth creating a risk to local employment and the regionally/nationally significant businesses based there.

Numerous sites within the SDNPA Land Availability Assessment have been excluded for various reasons, yet we consider that several of them warrant further review to further assess their potential suitability for development, given the national emphasis on growth and the significant increase in housing number. These are:

Reference	Site Name
EA011	Land north of Hambledon Road
EA013	Land west of East Meon Road
EA040	Land north of Hill Brow Road, west of Woodlands Lane and south of Huntsbottom Lane
EA046	Land south of Larcombe Road, west of The Causeway and north of Horse Chestnut Farm
EA053	Land at Kingsfernsden Lane
EA063	Land north west of Tilmore Road
EA145	Land at Tilmore West
EA214	Land south and west of Gunns Farm, Hollycombe Close and South Road
EA224	Land north of Rowlands Castle

With regards to meeting the needs of all types of housing, we welcome the allocation of land for traveller accommodation to meet identified needs.

Providing jobs and supporting the economy

There is no word touted more by the Government than 'growth'. Chancellor of the Exchequer Rachel Reeves said, (29 January 2025),

"Today, I want to talk about economic growth. Why it matters. How we achieve it. And what we are going to do further and faster to deliver it. Before we came into office, the Prime Minister and I have said loud and clear: Economic growth is the number one mission of this government."

Without growth, we cannot cut hospital waiting lists or put more police on the streets. Without growth, we cannot meet our climate goals, or give the next generation the opportunities that they need to thrive. But most of all, without economic growth, we cannot improve the lives of ordinary working people.

Because growth isn't simply about lines on a graph. It's about the pounds in people's pockets. The vibrancy of our high streets. And the thriving businesses that create wealth, jobs and new opportunities for us, for our children, and grandchildren."

This shows 1) growth as the UK's top priority, 2) growth as necessary for public services, and 3) growth is experienced personally on the ground; money in pockets and the environment and services we see and use.

The SDNPA is not immune to this. EHDC is keen to ensure that housing growth is accompanied by sufficient employment to support sustainable economic growth across the SDNP area.

In response to feedback provided at the Regulation 18 stage, EHDC welcomes the inclusion of policy SDE1 that supports the provision and enhancement of employment floorspace, safeguarding existing employment space from alternative uses. We recognise the importance of key employment sites such as Estée Lauder's global manufacturing plant in Petersfield, which employs well over 1,000 people and relies significantly on workers commuting into the district. It is likely to be the largest employer within both East Hampshire and the SDNPA area. Supporting the long-term success of such major employers requires not only strong employment policies, but also the provision of sufficient affordable housing in accessible nearby locations to support the local workforce.

EHDC would be particularly keen to ensure that there is an adequate supply of industrial floorspace to support key high employment yielding sectors including advanced manufacturing and engineering alongside technical and professional services. This is in the context of a relatively low job density in the district (0.65 jobs per working age resident) and productivity levels (GVA) lower than the regional average.

However, people who live in the SDNP need a wide range of job opportunities, including for young people, and they need services and facilities that are sustained by wider economic growth. Flexibility should be built into the Local Plan to ensure that there are opportunities for both housing and development that provides jobs and development that supports the wider economy.

We particularly are concerned that Local Plan objectives 12 and 14 do not capture the needs and potential of the SDNP's larger towns such as Petersfield, that have a significant industrial presence and act as major employment centres serving a wider travel to work area - i.e., operate at greater scale than the smaller towns and villages and should be treated separately to acknowledge and enable their greater-than-local economic contribution and growth potential.

Achieving thriving communities

[EHDC's Community Development Strategy \(2025-2028\)](#) sets out a clear ambition to *build thriving and resilient communities*, underpinned by access to housing, services, community infrastructure and strong local networks. This aligns closely with the vision of the South Downs National Park Partnership Management Plan, which recognises that a climate resilient landscape must also support thriving communities and a dynamic rural economy.

However, the Regulation 19 Local Plan, as currently drafted, does not sufficiently demonstrate how this ambition will be realised across the East Hampshire part of the National Park.

Pressure on community sustainability

Across East Hampshire, there is clear evidence that rural communities are already under pressure. The loss of local services and facilities, including village shops, pubs, post offices and community venues, reflects a broader trend of declining viability in rural settlements.

Recent examples include:

- Closure of the Isaac Newton pub and tearoom in East Meon
- Closure of Farringdon village hall

- Closure of the Queens Hotel and village shop in Selborne
- Closure of East Tisted Post Office and Store
- Loss of the Blue Bell pub in West Liss to residential redevelopment
- Closure of the Binsted Inn

These facilities are not simply commercial uses, they function as vital community anchors that support social interaction, wellbeing, and local identity. Such spaces support a wide range of social, cultural and support services and contribute significantly to community cohesion and resilience.

Without intervention, the continued erosion of this infrastructure risks accelerating social isolation, reducing access to services, and weakening the sustainability of our rural settlements.

Relationship between housing and community vitality

The Local Plan must more clearly recognise the direct relationship between housing delivery and the sustainability of communities.

- Insufficient housing, particularly affordable housing, reduces the ability of younger households, families and key workers to remain within communities.
- This contributes to an ageing population profile, which is already a defining characteristic of the National Park and is associated with increased health and social care demands.
- A shrinking and ageing population base undermines the viability of local services, schools, community groups and businesses.

In this context, the relatively low levels of housing proposed within the East Hampshire part of the National Park risk reinforcing existing demographic and service pressures, rather than addressing them.

Relationship Between Housing and Infrastructure Funding

The SDNPA operates the Community Infrastructure Levy (CIL) and receives a significant number of funding applications each year. Demand for infrastructure funding is considerable, with CIL representing one of the few remaining mechanisms capable of supporting both major strategic infrastructure projects and smaller community-led initiatives. These include improvements to schools, nurseries, medical and leisure facilities and village halls, all of which make an important contribution to local communities and quality of life.

The relationship between development and infrastructure funding is straightforward: the greater the level of CIL-generating development, the greater the opportunity to invest in necessary infrastructure improvements. It is notable that more CIL is collected in East Hampshire within the SDNP, than any other part of the SDNP, yet it is spent across the whole SDNP.

To date, East Hampshire District Council's CIL funding has supported projects within the SDNP where it can be demonstrated that they facilitate growth within the East Hampshire CIL area. However, as competing demands on this funding increase, the scope for such support may become more limited.

Accordingly, there remains a clear benefit in the SDNPA maximising the amount of CIL generated and retained within the National Park area through appropriate and sustainable development, ensuring the timely delivery of essential infrastructure.

Role of sustainable settlements

EHDC considers that the Regulation 19 Local Plan does not fully capitalise on the role that the National Park's more sustainable settlements can play in supporting thriving communities.

Settlements such as Petersfield, Liss and Liphook:

- already function as key service centres,
- have established community infrastructure,
- benefit from public transport connectivity (including rail links), and
- serve wider rural hinterlands.

A greater proportion of development in these locations would:

- strengthen their role as local hubs,
- support the retention and enhancement of services, and
- reduce pressure on more isolated rural communities.

This approach would be consistent with the Local Plan's own objective to support towns and villages as social and economic hubs and to improve access to services and infrastructure.

Supporting rural villages

At the same time, the Local Plan should provide clearer support for proportionate growth in smaller rural settlements.

Limited, well-designed development in villages can, sustain local facilities such as village halls, shops and pubs, support community-led initiatives and asset transfers, maintain balanced communities and reduce the risk of settlements becoming increasingly unsustainable.

Without such growth, there is a real risk that smaller communities will continue to lose services and become less viable over time.

Alignment with thriving communities' agenda

Overall, EHDC is concerned that the current spatial strategy does not sufficiently align with the shared ambition, set out in both the Community Development Strategy and the Partnership Management Plan, to create thriving, resilient communities.

To address this, the Local Plan should:

- Better demonstrate how housing delivery supports community sustainability and service provision
- Increase the level of development in sustainable settlements within East Hampshire
- Support proportionate growth in rural villages to maintain local services
- Strengthen the link between housing, infrastructure, and community wellbeing outcomes

In doing so, the Local Plan would more effectively balance the statutory purposes of the National Park with its duty to foster the social and economic wellbeing of local communities.

SDA31 – Land West of Liphook

EHDC supports the inclusion of sports infrastructure on this site. However, the proposal currently lacks essential supporting ancillary facilities for the pitches. Aside from parking provision, no additional ancillary elements have been identified. Depending on the pitch size, the inclusion of toilets is a minimum requirement to comply with Sport England guidance.

The proposal for an outdoor classroom, with a Community Use Agreement, would benefit from further clarification. Specifically, it would be helpful to understand the evidence of need for this facility and to identify the intended end users.

The inclusion of facilities that support young people recreation should be considered. However, specifying a skate park and/or pump track at this stage may unduly limit the developer's ability to undertake meaningful community consultation and to review existing provision within the parish. These types of facilities are also known to appeal disproportionately to boys/males, which may reduce their inclusivity. More flexible wording would therefore be advisable, allowing the final form of young people provision to be shaped through community engagement and evidence of local need.

Heritage

Overall, the Plan demonstrates a strong commitment to conserving and enhancing the historic environment of the South Downs National Park. The emphasis on landscape character, settlement pattern, and the integration of cultural heritage within planning policy is particularly positive. Previous comments made during the Regulation 18 consultation appear to have been considered and therefore we support the heritage-based policies.

Other Comments

Policy SDN5 Wealden Heaths complex

EHDC supports Policy SDN5 in principle, particularly its intent to ensure development fully reflects the sensitivities of the Wealden Heaths complex. However, there is currently an inconsistency between the supporting text and the policy wording which needs to be addressed for clarity and effective implementation.

The supporting text correctly explains that the "Wealden Heaths complex" comprises Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons), Wealden Heaths Phase II, Woolmer Forest SAC, and Shortheath Common SAC. However, the policy wording itself refers only to Wealden Heaths Phase II, Woolmer Forest SAC and Shortheath Common SAC, omitting Phase I.

This discrepancy is confusing and risks misinterpretation when applying the policy.

Climate Change

EHDC strongly supports the ambitious policies for climate change mitigation and adaptation, particularly the commitment to achieve net zero operational emissions by 2040 (Policy SDN9). Policy ambitions for clean energy generation, reductions to embodied carbon

emissions and the implementation of water efficiency standards are supported. Climate adaptation measures such as the integration of nature-based solutions for flood, water and coastal resilience are also supported.

Conclusion

In conclusion, while EHDC recognises the overall purposes of the national park, and the positive elements within the Regulation 19 Local Plan, including its strong environmental focus, heritage protections and support for employment floorspace, we remain fundamentally concerned that the Plan, as currently drafted, does not go far enough to support the long-term sustainability of communities within the South Downs National Park.

The scale and distribution of development proposed—particularly within the East Hampshire area—fails to respond adequately to identified housing needs, economic challenges, and the clear link between growth, community vitality and the retention of local services. Without a more ambitious and balanced approach to housing and employment provision, there is a real risk that communities within the National Park will continue to experience declining services, an increasingly ageing population, and reduced economic resilience.

EHDC strongly considers that the Local Plan should make more effective use of sustainable settlements, alongside supporting proportionate growth in rural villages, to ensure that communities remain vibrant, inclusive and viable. This is essential not only to meet local needs, but also to fulfil the National Park Authority's duty to foster the social and economic wellbeing of its communities.

Until these issues are addressed, EHDC maintains its objection to the Regulation 19 Local Plan. We would welcome the opportunity to continue working collaboratively with the South Downs National Park Authority to ensure that the Plan evolves into one that successfully balances its environmental objectives with the needs of the people and communities it serves.

Typing error

Policy SDT3 has spelt Bordon incorrectly.