

The Rt. Hon. Michael Gove, MP,  
Secretary of State for Housing,  
Communities and Local Govt.,  
House of Commons  
London  
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**Date:** 23<sup>rd</sup> September 2021

Dear Mr. Gove,

East Hampshire District Council welcomes your appointment as the new Housing Secretary.

It is understood that the Government is to pause its proposed reforms to the planning system and review them, before deciding how to proceed. Whilst it is agreed that the majority of the proposals associated with the White Paper (August 2020) need careful consideration before being implemented, it is considered the standard method for calculating local housing need needs addressing now.

East Hampshire District Council (EHDC) fully supports the Government's commitment to significantly boost the supply of homes to meet the growing needs of the population. EHDC are committed to meeting the varying needs of our 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 delivery of new housing should be set at a realistic level, one that recognises the local environmental constraints.

The current methodology has major implications on rural areas such as East Hampshire, more so with the added complexities associated with the presence of the South Downs National Park (SDNP), which accounts for 57% of the district.

The National Planning Policy Framework (NPPF) is clear that the standard method in the national planning guidance (PPG) should be used to determine the minimum number of homes needed within an area – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The PPG further acknowledges that the standard method is not mandatory but notes an alternative approach would be scrutinised more closely at examination. There is no further guidance that explains what warrants an exceptional circumstance, a matter that requires urgent clarification.

The PPG notes the flaws associated with the standard method where strategic policy making authority boundaries do not align with local authority boundaries, as is the case in East Hampshire due to the presence of the South Downs National Park. It is acknowledged that the data required for the model does not disaggregate between the National Park and the wider area, and that an alternative approach will have to be used. There is no guidance on this alternative approach, other than a locally determined housing need figure which will need to consider the best available information on anticipated changes in households as well as local

affordability ratios. There is no disaggregated information available on these two data sets. It is fundamental that an alternative approach is clarified to assist those strategic policy making authorities preparing local plans.

The lack of guidance results in the standard method remaining the starting point for calculating local housing need. As it results, it adds pressure to local planning authorities who share boundaries with National Parks to find greenfield land to meet unrealistic housing targets. Important agricultural land and environmentally valuable land will inevitably be lost as the unmet needs associated with National Parks have to be accommodated in adjacent rural districts.

EHDC fully supports the Government's vision for National Parks established in the 2010 Circular and reiterated in the NPPF. Great weight should indeed be given to conserving and enhancing landscape and scenic beauty in National Parks. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and it is agreed that the scale and extent of development within these designated areas should be limited. However, protecting and enhancing these areas should not be at the expense of those predominately rural areas in adjacent strategic policy making authorities. By their very nature, house prices associated with National Parks are significantly higher, therefore, it has repercussions on the formula associated with the standard method for calculating local housing need.

EHDC agree that an affordability adjustment should be applied as household growth on its own is insufficient as an indicator of future housing need. An affordability adjustment ensures local housing need responds to price signals and will go some way to address the affordability of homes. However, the high house prices in protected areas such as National Parks artificially increases housing numbers for those authorities adjacent as the NPPF requires strategic policy making authorities to meet any unmet needs of its neighbours. As mentioned, this means rural areas such as East Hampshire need to find more greenfield land to accommodate the unmet needs of the highly protected SDNP.

The underlying reasons that the standard method for assessing local housing need was introduced in 2018, was to offer clarity to local authorities and reduce the lengthy delays to local plan preparation as housing numbers were debated during Examination. Such an approach was needed and has positively informed the majority of authorities when preparing their local plan. However, it remains a stumbling block for authorities such as EHDC whose area is dominated by a national park.

The Government's Planning White Paper (August 2020) went some way to explore the standard method and address some of the current flaws mentioned above in relation to local authority boundaries. The proposals involved a housing requirement that would factor in land constraints and opportunities to more effectively use land. This approach would allow authorities such as East Hampshire to plan for housing numbers that have already taken into account the constraints associated with the South Downs National Park. This binding number would offer further clarity to such affected authorities and stop debate at examination which often dominates the process and slows down plan-making.

It is extremely important that the flaws associated with the standard method for calculating local housing need are remedied now. As it stands, areas like East Hampshire cannot easily plan for its future development needs due to the unrealistic numbers associated with the

presence of the National Park. Further guidance is needed on how such strategic policy making authorities can determine their housing needs.

I urge you to address this as a matter of urgency to stop the unwarranted development of large swathes of greenfield land in rural districts such as East Hampshire.

Yours sincerely

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

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