



Department for Levelling Up,
Housing & Communities

Councillor Richard Millard
Leader of East Hampshire District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

Marcus Jones MP
Minister of State for Housing

***Department for Levelling Up, Housing and
Communities***

Fry Building
2 Marsham Street
London
SW1P 4DF

Our reference:19638321
Your reference: RM/HS

5 September 2022

Dear Councillor Millard,

Thank you for your letter of 20 July to the Rt Hon Greg Clark MP setting out your concerns about the standard method for calculating local housing need and its impact on authorities such as East Hampshire, where a significant area of the district is covered by designated National Park. I am replying as this matter falls within my ministerial portfolio. Please accept my apologies for the delay in this response.

I understand that officials in the Planning for Housing Need team met with officers from the District Council on 27 July, and I hope that they found this discussion productive.

I would advise you that I am unable to comment on specific plans or local issues. I can, however, offer the following general comments to address the points you raise, which I hope you will find useful.

The Government has been clear that to help make home ownership affordable for more people, and to help more people rent their own home, we need to deliver more homes. To get enough homes built in the places where people and communities need them, a crucial first step is to plan for the right number of homes. That is why, in 2018, we introduced a standard method for assessing local housing need to make the process of identifying the number of homes needed in an area quick and transparent.

I would like to assure you that the standard method does not provide a housing target, rather it is used by councils to inform the preparation of their local plans. Councils decide their own housing requirement once they have considered their ability to meet their own needs in their area. This includes taking local circumstances and constraints into account and working with neighbouring authorities if it would be more appropriate for needs to be met elsewhere. This recognises that not everywhere will be able to meet their housing need in full.

However, as you have identified in your letter, where strategic policy-making authorities do not align with local authority boundaries, as is the case for authorities like East Hampshire where the local authority boundary does not align with the strategic policy-making area due to the presence of the National Park, an alternative approach will have to be used.

I note your concern that the NPPF contains little guidance on what could constitute an alternative approach. However, the NPPF does explain that where this applies authorities may continue to identify a housing need figure using a method determined locally, so in a similar way to the approach in place prior to the introduction of the Standard Method where need was determined locally. The NPPF is clear that this assessment would need to consider the best available

information on anticipated changes in households as well as local affordability levels. The approach to assessing housing need will be tested at examination so should be sound and based on robust evidence.

Your letter sets out that the high levels of protection against development that apply within the South Downs National Park requires adjacent rural areas such as East Hampshire to accommodate the unmet housing needs of the National Park under the Duty to Co-operate. The Levelling Up and Regeneration Bill (LURB) sets out that the Duty to Co-operate will be rescinded, and Ministers have been clear that a more flexible "Alignment Test" will be proposed in the revisions to the National Planning Policy Framework (NPPF). This will ensure that cross boundary working remains important. As a policy tool rather than a legal duty, however, it will present more flexibility for local planning authorities and Planning Inspectors to make changes to a plan during preparation or at examination to address weaknesses in alignment or respond to emerging issues.

As with all policies, I would like to assure you that we are monitoring the impact of the standard method, particularly as the impact of changes to the way we live and work and levelling up become clear. A review of the NPPF is likely to be required to reflect our wider changes to the planning system set out in the LURB. Decisions on how these changes are to be taken forward will be made in due course.

Thank you again for your letter.

Yours sincerely,


MARCUS JONES MP