

The Rt. Hon. Michael Gove, MP,  
Secretary of State for Housing,  
Communities and Local Govt.,  
House of Commons  
London  
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**My reference:** RM/HS  
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**Date:** 20<sup>th</sup> October 2021

Dear Mr. Gove,

Further to my correspondence on the 23rd September 2021, I am writing to request further clarification on emerging planning policy, the use of the standard method to calculate housing needs and the direction of travel regarding greenfield development.

At the Conservative Party Conference 2021 in Manchester earlier this month, the Prime Minister was clear that the Government were committed to meeting the growing needs of the population, a sentiment shared by East Hampshire District Council (EHDC). However, he reinforced that development to meet these needs should not be on green fields or 'jammed' in the South East, but "*beautiful homes on brownfield sites in places where homes make sense*". EHDC seek clarity on this statement as there was no mention of the standard method, which very much forms the basis for determining housing targets that need to be addressed by local plans. There is a dearth of developable brownfield sites in rural areas such as East Hampshire, yet targets derived from the standard method for calculating local housing needs remain huge and unprecedented.

The standard method, as it currently stands, does not allow for environmental constraints and does not address strategic policy making authority boundaries that do not align with local authority boundaries (as relayed in my previous correspondence). There needs to be further clarification on how the Government's aspiration to not build on green fields in the south east will be realised through emerging planning policy. There needs to be further indication, immediately, on whether the standard method will be abandoned or revised, or whether further guidance will be released to assist strategic policy making authorities such as EHDC, so that emerging Local Plans are not delayed.

The Prime Minister's speeches did not acknowledge or show any awareness of the unfairness and iniquities of the standard method for places like East Hampshire, that are constrained by the presence of the South Downs National Park (SDNP), which accounts for 57% of the district.

EHDC support the dropping of the initial proposals to amend the standard method's algorithm, which would have seen even more pressure asserted on the rural South East, in favour of a greater focus on building in existing areas. However, these changes only go some way to address the use of Brownfield land to meet future housing needs, more needs to be done. Whilst I am encouraged by the Prime Minister referring to a need to focus housebuilding on brownfield sites first in his conference speech, there needs to be radical changes to National

Planning Policies and supporting guidance for this to be fully realised and addressed. Our green fields need to be protected and our towns regenerated, the latter even more so following the Covid-19 pandemic, but without effective actions put into place, then these aspirations will be in vain.

The Prime Minister made clear the levelling up policy was designed to *“take the pressure off parts of the overheating South East, while simultaneously offering hope and opportunity to those areas that have felt left behind”*. These strong words in regard to housing in the South East and development on green-field land has been met with some local authorities pausing progression on local plans. This aligns with your recent pause of the government’s planning reform proposals. Whilst EHDC are taking a more cautious approach to pausing its emerging local plan, given the threat of speculative applications that would lead to unplanned development, more clarity on a way forward would be appreciated.

The ‘Planning newsletter’ dated October 2020, from the Chief Planner to all local planning authorities, noted that the uncertainty around policy proposals (as outlined in the Planning White paper) should not stop preparation of plans for the area. However, your recent public pausing of these reforms combined with the Prime Minister’s speech on green-field development has created yet more uncertainty for local authorities preparing plans.

I urge you to consider the above, a-long with flaws associated with the standard method for calculating housing need (conveyed in my previous correspondence), to give areas like East Hampshire more clarity on a way forward with regards to its emerging local plan. Without urgently addressing such matters, EHDC will be at the mercy of speculative applications, lacking the necessary infrastructure to sustainably support our towns and villages, particularly in light of the growing impacts arising from climate change. This would also highly detrimental to the Prime Minister’s stated preference to avoid building on green-field land in the South East.

Yours sincerely



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