

EAST HAMPSHIRE LOCAL PLAN

Government's planning overhaul to reach 1.5 million new homes (December 2024)

Questions and Answers Prepared March 2025

In support of its 'Growth Agenda' the Government made significant changes to national planning policy in December 2024. This document addresses some questions about those changes and identifies implications for East Hampshire.

This Q&A is written at a point in time, with new information still being published by the Government. It should be read in that context.

Any queries should be directed to localplan@easthants.gov.uk.



No.	Question
-----	----------

1	What is a Local Plan and why do we need one?
---	---

The Local Plan is East Hampshire District Council's key planning policy document for areas of the district outside of the South Downs National Park (SDNP). It sets planning rules for development which cover housing, business, infrastructure, health, community facilities and the environment. It identifies how many new homes will be built and where.

2	Where have we got to with our new Local Plan?
---	--

We have been preparing a [new local plan](#) since 2018. Since then, we have carried out 4 early-stage consultations (known as 'Reg.18' stage). In early 2024, we consulted on a draft Local Plan 2021-2040, which included development management policies, and proposed site allocations. Summaries of all the responses received to all 4 consultations are available on our [website](#).

We have also prepared extensive [evidence base](#) documents informing the new local plan and carried out calls for sites. We continue to work with our neighbouring councils and partners as part of the [Duty to Co-operate](#).

The timetable for the Local Plan (known as the 'Local Development Scheme', LDS) is available on our [website](#), dated March 2025.

3	What period does the Local Plan cover?
---	---

Our draft Local Plan 2024 covered the period 2021-2040.

The [National Planning Policy Framework](#) (NPPF) requires a plan-period of 15 years from adoption. 18 years is considered to represent a likely plan-period (2024-2042) to allow for the necessary work on respective neighbourhood plans and the emerging local plan.

4	Why has everything suddenly changed?
---	---

The new Government made clear its intentions early on, referencing the housing crisis and consulting on increased mandatory housing numbers and a new NPPF in summer 2024. It said it would make the difficult decisions needed to deliver 1.5million new homes.

"Deputy prime minister Angela Rayner has announced plans to end the influence of NIMBYs on housebuilding, vowing they will 'no longer have the upper hand'".

The speed and extent of changes has perhaps been surprising but correlates with what the Government said it would do.

5 Is the new housing number mandatory?

Yes. 1,142 is the housing number for East Hampshire District, and there is no deviation from that in terms of it being the starting point for the local plan, and our local plan should aim to meet it. In our case, whilst we can look to disaggregate the number to ascertain housing needs inside and outside the national park, we still need to consider any unmet needs from the South Downs National Park (SDNP). Effectively, we would need to take account of any provision in the SDNP, subtracting that from our number of 1,142. For example, if the SDNP were to plan for 90 homes a year in East Hampshire, we would subtract that from 1,142.

6 Is the standard method for calculating local housing need mandatory?

In line with the Planning Practice Guidance (PPG), the standard method should be used to assess housing needs. However, it is recognised that there are some specific circumstances in which an alternative approach could be justified. These special circumstances relate to areas where the local planning authority boundaries do not align with district/borough boundaries, or where the data required for the model are not available, such as in National Parks.

In East Hampshire we may continue to identify a housing need figure using a method determined locally, but it must take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. Therefore, it must still align with the standard method.

It is important to note that even if the housing needs are disaggregated, the local plan must not only seek to meet our own needs, but also the unmet need from neighbouring areas where practical to do so.

7 How much attention should we pay to the South Downs National Park Local Plan Review?

Any new homes planned in the SDNPA Local Plan Review in East Hampshire will assist us with meeting the 1,142 mandatory housing requirement for East Hampshire. At the moment it looks like approx. 90 homes are being proposed per year in East Hampshire within the SDNP. We believe this should be higher to help sustain vibrant communities. We responded to their previous consultation making this case and have done so again for the recent consultation (2025). It is important we continue to do this.

However, realistically, the number of new homes being planned for in the SDNP is not going to significantly increase as it is a protected national landscape. The Government has had every opportunity to adapt the

housing requirement to take account of our unique situation (following extensive lobbying) but has chosen not to do so.

That said, the SDNPA Local Plan Review is highly relevant for us as it sets the vision and planning framework for many residents in East Hampshire.

8 Why do we have to consider other's 'unmet' housing need but no one considers our unmet need?

Paragraph 11 of the NPPF makes it clear that considering the unmet need of other areas is not optional, it is a requirement of plan making. It is understandable that the residents of East Hampshire may feel aggrieved by this. East Hampshire has been subject to a very large increase in its requirements for new housing because of the Government's new formula for calculating mandatory housing needs.

Whereas some planning authorities may cite overriding constraints or simply have run out of developable land and can therefore ask others to help meet their needs, there is considerable land in East Hampshire that does not have such protection within national planning policy.

Theoretically, based on the evidence in the [Land Availability Assessment](#) (LAA), we potentially could allocate sufficient land for development to meet our housing requirement and therefore cannot justify asking others to help.

9 What are 'indicative housing figures' and why have they been published?

We have published [indicative housing figures](#) (Jan 2025) for neighbourhood plan purposes only. The new local plan will determine the local planning authority housing requirement and determine the settlements and sites that will address those requirements. However, in advance of these requirements and in line with national policy, the Council should provide an indicative figure to allow neighbourhood areas to maintain progress on their respective plans.

These indicative housing figures do not take account of unmet need of neighbouring authorities, nor do they align with the emerging settlement hierarchy or local plan strategy. Instead, they are a minimum indicative housing figure to be considered as part of the production of neighbourhood plans.

10 Do sites allocated in the Local Plan count towards indicative housing figures for the Neighbourhood Plan? e.g. would the number of homes proposed at Neatham Down strategic site reduce the indicative figure for Alton?

Broadly speaking, yes, because the Neighbourhood Plan indicative numbers are determined using the same basic method as the Local Plan, so the targets are aligned. But the indicative numbers are indicative, they don't apply to the Local Plan which will also need to take account of unmet needs (so the target is likely to be different - higher - for the Local Plan). Plus, the Local Plan will determine an overall strategy for the planning area, and that work (how to distribute the development across the geography of the planning area as a whole) could change the target for specific settlements.

11 How does the new mandatory number affect the Five-Year Housing Land Supply (5YHLS) position?

The new mandatory number makes it very difficult for the Council to be able to demonstrate a 5YHLS. We were struggling to demonstrate 5YHLS against the old number, therefore it will not be possible to demonstrate 5YHLS against this new number for some time. As such, the 'tilted balance' applies and the presumption in favour of sustainable development will be in place.

The Council's 5YHLS position is available on the [website](#). No Council in Hampshire can demonstrate a 5YHLS.

12 Why does EHDC not have a 5YHLS?

National policy requires all Local Planning Authorities (LPA) to actively manage their housing land supply and demonstrate that the authority can identify a supply of specific deliverable sites for the next five years. More specifically, LPAs should identify and update annually the supply of specific deliverable sites against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.

The requirement to demonstrate 5YHLS is not new and has been the nemesis of Councils for a long time. We had a period of stability where we were able to demonstrate 5YHLS, but to maintain, it requires consistent permitting of permissions for new homes and the evidenced intention to deliver those homes within 5 years. The requirements to demonstrate deliverability are tight and scrutinised at appeal. A combination of Covid, the Ukraine war, finance/market/resourcing issues etc has meant that delivery has slowed down and this affected our 5YHLS, making it increasingly challenging to meet the requirements. However, the new mandatory housing requirement greatly moves the goal posts, making it extremely difficult for the Council to be able to demonstrate 5YHLS for the

foreseeable future. As noted above, no Council in Hampshire can demonstrate a 5YHLS.

13 Is every site identified as developable in the Land Availability Assessment (LAA) now at risk of receiving planning permission or being allocated in the Local Plan?

The [LAA](#) is a high-level assessment that informs the Local Plan. It identifies developable and deliverable sites for consideration in the Local Plan.

There may be constraints to development that have not yet been identified that come to light during consideration of a site for allocation or planning permission. However, all sites within the LAA need to be reconsidered and yes, there is a real risk of this being the case.

If all sites that are currently included in the LAA were to come forward for development, then they could deliver about 15,000 homes.

14 Will the next version of the Local Plan have to include more than one Strategic site?

All the LAA sites need to be reconsidered. With such high numbers it is likely that more strategic sites will need to be allocated to meet the housing need.

15 Can Parish Councils discuss with the Council the potential capacities on each LAA site?

All capacities for LAA sites are indicative based on a set formula.

Those neighbourhood plans that wish to allocate sites should work with their consultants and those promoting sites to determine capacities of specific allocations. The detail of all allocations should be supported by relevant evidence.

16 Will an updated LAA be published this year to include any new sites that have been submitted?

We update the [LAA](#) annually. The LAA 2025 will be published towards the end of the year.

Those producing neighbourhood plans can also conduct a bespoke call for sites to cover their respective areas.

17 Can a Neighbourhood Plan select a different site that is more acceptable to the village rather than the allocated sites from EHDC?

If a parish is producing a neighbourhood plan and has chosen to make housing allocations, then a different site to those within the LAA could be brought forward for allocation - but the neighbourhood plan would need to

justify whatever it contains through the examination stage. However, the local plan will need to consider how housing needs can be accommodated collectively across the local planning authority area, which may require additional allocations within the local plan.

18 Do local designations carry any weight or has this been lost?

Local designations such as local gaps are still material considerations for planning purposes. However, when the presumption in favour of sustainable development is applied, the adverse impacts of development on local designations is unlikely to significantly and demonstrably outweigh the benefits, given the Government's emphasis on delivering 1.5 million homes.

19 Are there any other designations that restrict development?

National planning policy expects local plans to address the mandatory local housing needs unless protected areas or assets of particular importance provide a strong reason for restricting the overall scale or distribution of development. These protective designations are outlined within national policy:

- National Parks (SDNP)
- National Landscapes (formerly AONB)
- Special Protection Areas (SPA) and associated 400m buffer
- Sites of Special Scientific Interest (SSSI)
- Special Areas of Conservation (SAC) and associated buffer, where relevant
- Scheduled Ancient Monuments (SAM)
- Registered Parks and Gardens
- Ancient Woodland
- Local Green Spaces (identified in Neighbourhood Plans)
- Flood Zones (2&3)
- Area Tree Preservation Orders (TPO)

Although parts of East Hampshire are affected by the restrictive designations outlined above, there are also large areas where development is not restricted and must be considered as part of the local plan process.

20a Can we introduce designations to restrict development?

Any new material considerations would need to be evidence based and weighted.

Natural England recently held a second consultation on proposals to include parts of East Hampshire in an area of outstanding natural beauty, which East Hampshire District Council (now referred to as 'national landscape'). Land including Ludshott and Bramshott Commons, the southern slopes of Whitmoor Vale and a small part of the Slea and Wey

valleys could be incorporated into an extension of the Surrey Hills National Landscape (Area of Outstanding Natural Beauty (AONB)). If approved it would give those areas special status and protection.

There are no other new designations envisaged.

20b What about literary landscapes? (Jane Austen)

This has been discussed in local and national press. Whilst worthy of material consideration, 'literary landscapes' are not listed in the NPPF's protective designations (footnote 7) that could provide a strong reason for resisting development. Such a consideration would likely be material in the planning balance, but unlikely to result in adverse impacts that would significantly and demonstrably outweigh the benefits of new homes.

21 The SDNPA often uses the term 'valued landscape'. Does EHDC use a similar term in its local plan?

The NPPF notes valued landscapes. We have a Valued Landscape Addendum which is published on our website which needs to be read alongside the [Landscape Capacity Assessment](#).

22 Is sustainability of any relevance anymore?

This is a key question for rural East Hampshire, and one that will no doubt be a prominent issue at any appeals. The extent to which an 'unsustainable' location provides sufficient justification to say the adverse impacts of the proposal significantly and demonstrably outweigh the benefits will no doubt be tested. Para 84 of the NPPF remains relevant, which generally seeks to avoid isolated homes in the countryside. In some cases, the contention that a location is 'unsustainable' in respect of increasing the need for people to travel by car may need to be balanced with the use of Previously Developed Land.

In answer to the question, it remains relevant, and part of the planning balance, but the likelihood of adverse impacts in relation to the environment or a community in general does not immediately mean that planning permission can be refused. The tilted balance is in place as part of the overall planning balance exercise.

23 Can we increase densities to help meet housing need?

We can look to maximise development opportunities, particularly in settlements, but we need to remain mindful of the housing mix and what type of housing is needed, as well as the character of the district. We do need more smaller houses. However, just an increase in densities is not going to meet the new housing number alone – such is the extent of the huge increase.

A flat counts as 'one home' towards the housing requirement, in the same way a house does. See Q35 regarding care homes.

24 What are the 'benefits' of housing developments?

The tilted balance means the planning balance exercise needs to consider whether any adverse impacts of the proposal would significantly and demonstrably outweigh the benefits. So, what are the benefits?

New housing is a benefit, especially affordable housing. The Government's emphasis on the housing crisis, and the content of the NPPF, makes this clear. As an example, a proposal for 100 new homes, would provide 60 market homes and 40 affordable homes. The housing alone is considered 'benefits'. The proposal would also pay the Community Infrastructure Levy (CIL) and may also be required to contribute to specific infrastructure projects through a S106 agreement. It would likely provide some on site open space, and possibly a small playground. These are all benefits too.

A proposal does not need to be providing 'extras' all the time, to demonstrate benefits, the housing alone is considered of benefit. Larger sites may, where needed, provide other infrastructure, but only where it is specifically needed, and in some cases a S106 contribution towards improvements to existing infrastructure may be more appropriate and effective.

25 Infrastructure – what can we do to make sure we don't get lots of new homes without the supporting infrastructure needed?

"All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;" NPPF, para 11.

When preparing a new Local Plan, the local planning authority (LPA) is required to prepare an [Infrastructure Plan](#), that shows what infrastructure is needed to support the growth planned, how it will be delivered, its cost and timescales. This information is gathered through engagement with infrastructure providers during the preparation of the local plan. A draft Infrastructure Plan supported the Draft Local Plan consultation 2024.

When determining applications for new homes, relevant infrastructure providers are consulted. The stance the LPA can take in terms of infrastructure provision very much depends on what response is received (if at all). The LPA would be unwise to refuse applications on specific infrastructure grounds without the support of and evidence from the infrastructure provider. In most cases, issues can be conditioned.

The Council will seek Section 106 (S106) agreements where possible (noting there are strict legal criteria for this). [Community Infrastructure Levy](#) (CIL) payments will be made from qualifying residential development. The Council has been pro-active in its approach to CIL to date. Neighbourhood CIL is also passed to Parish/Town Councils (25% if there is a neighbourhood plan, 15% if not).

The Council has [key evidence base studies](#) that demonstrate what infrastructure is needed, including the Playing Pitch Strategy and Sports Facilities Strategy which have Action Plans for projects. We are also preparing an Action Plan to sit alongside the Open Space Strategy 2018 and a Community Buildings Assessment. This work will help provide the information to justify S106 requests and assess CIL applications.

The benefit of getting a local plan in place is that we can look at infrastructure cumulatively across the plan period, rather than in response to each individual planning application. However, whilst it is the responsibility of the LPA to consider infrastructure in its planning processes, it cannot deliver the infrastructure. Infrastructure providers have many considerations and prioritisations across their geographical area.

26 How will the Council facilitate new, expanded or upgraded public infrastructure?

The Planning Policy Team is in regular contact with infrastructure providers to determine what infrastructure is required to meet development needs. An [Infrastructure Plan](#) will be produced alongside the Local Plan setting out the infrastructure that is required and costs associated with delivery. Planning policies within the local plan will determine where contributions and/or physical infrastructure is required to support the delivery of corresponding infrastructure.

When planning applications are subsequently determined, the developers will be required to pay contributions or physical infrastructure via S106 agreements to mitigate the adverse effect of development. In addition, developers will be required to pay a CIL contribution to address cumulative infrastructure needs.

27 We think there isn't sufficient infrastructure in our local area to support new development – can this prevent development?

We can and are working to make sure we have detailed evidence base on what infrastructure is needed to support the level of growth planned and working with relevant infrastructure providers. But the Government has made clear its position on housing and growth, and just general infrastructure issues that are common across most places are not likely to be a showstopper constraint to development.

28 How can the Local Cycling and Walking Infrastructure Plans (LCWIP) be used to ensure development is (more) sustainable?

Local cycling and walking infrastructure plans (LCWIP) are a strategic approach to identifying cycling and walking infrastructure at the local level.

The [East Hampshire LCWIP](#) has been developed by Hampshire County Council. LCWIPs focus on encouraging local sustainable travel by walking and cycling by building a connected network of priority cycling and walking networks, taking into consideration local trip generators, such as large areas of residence, employment and leisure. Reducing the need to travel by car and instead encouraging travel by alternative active travel modes of walking and cycling, where possible, is a focus of the emerging local plan and national policies.

Along with a network of preferred walking and cycling routes for the district, the LCWIP provides a prioritised programme of infrastructure improvements for future investment. This informs the emerging infrastructure development plan of the local plan, that will inform infrastructure requirements for future planning developments and can be sought as obligations for planning applications, where necessary, as well as future strategic infrastructure schemes.

29 What happens to neighbourhood plans?

Neighbourhood plans remain part of the Development Plan and carry weight. They can still impact on the presumption in favour of sustainable development, as long as they are not more than 5 years old and meet the identified housing requirement (see para 14 of NPPF).

The only neighbourhood plan that is less than 5 years old and include housing allocations to meet needs is Alton Neighbourhood Plan. However, this will lose its '5 year status' in November 2026.

However, those preparing/updating neighbourhood plans and looking to allocate sites can ask the LPA for an indicative housing figure. As such, the Council published [indicative housing figures](#) for each town or parish within the district (outside the National Park) to allow communities to maintain progression on the production of neighbourhood plans.

These published figures are not the final housing requirements. The new local plan will decide the actual housing requirement, considering unmet needs from nearby areas and supporting evidence such as the amount of land that can be sustainably developed. As required by national planning policy, the Council should provide indicative housing figures to help neighbourhood planners if they want to create plans before the new local plan is ready. The figures published can be used as a starting point for considering housing allocations as part of neighbourhood plans.

What these figures do show is the effect the Government's increase in housing numbers is likely to have on areas around East Hampshire outside the park. The Government has doubled the number of homes we are expected to deliver in East Hampshire and these numbers reflect the impact of that decision.

30 Housing Delivery Test (HDT) – what does this involve?

The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities. It is a percentage measurement of the number of net homes delivered against the number of homes required over a rolling 3 year period. There are certain consequences for local planning authorities where the HDT indicates that delivery has fallen below requirements:

- a. where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years;
- b. where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as, in addition to the requirement for an action plan;
- c. where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, in addition to the requirements for an action plan and 20% buffer.

East Hampshire's current HDT measurement is 88%, which means we need to publish an Action Plan over the next six months. An Action Plan must identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

31 What are the causes of housing under-delivery which has impacted the Housing Delivery Test (HDT)?

There are several reasons contributing to under-delivery. Housing completions in East Hampshire, as well as nationally have declined since highs around 2017/18. The Housing Delivery Test covers a three-year period and therefore, the covid-19 pandemic still affects delivery rates. The economic climate has also affected delivery rates, with materials costing more and many developers experiencing shortages in labour. All these factors have affected delivery within East Hampshire, as well as a lack of planning permissions being granted in recent years.

Planning applications:

- **What can we expect to see this year in terms of planning applications?**
- **Have we had many large housing applications submitted?**
- **Are they determined using the new NPPF even if they were submitted before it?**
- **Can Parish & Town Councils and residents still respond?**

Developers are likely to consider the next 18-36 months as the greatest opportunity to secure planning permission for new homes that there has been for a long time.

Such is the increase in the mandatory housing number that it is very unlikely the LPA will be able to demonstrate a 5YHLS or retain the HDT at 88%. As such, it removes the likelihood of there not being a 5YHLS, and then that changing. There is now a sustained period that developers will be able to rely on the 'tilted balance' presumption in favour of sustainable development to seek a planning permission.

We are dealing with some pre-apps for major development (confidential), and applications. These are steadily being submitted, and we expect more. Planning committee can expect to consider many more major applications for housing than ever before, for a longer period as the tilted balance is expected to remain in place for the foreseeable future.

Planning decisions are made based on the most up-to-date position regarding policy and evidence, even if the application were submitted prior to those changes.

The process for determining planning applications hasn't changed in relation to the opportunity to comment.

How many homes have been approved/completed?

Every year we publish an [Authority Monitoring Report](#) (AMR), which shows how many new homes have been completed each year, including how many affordable homes. In 2023/24, 252 homes were completed. This is the lowest number of new homes completed for over 10 years.

At 31 March 2024, there were 4,040 homes approved that have not yet been completed. These new homes, and any further permitted, will go towards meeting the identified local housing needs, and will mean less homes are needed to be found within the new local plan.

34 What can we expect from statutory consultees? (e.g. Hampshire County Council (HCC) highways, education, Integrated Care Board)

Statutory consultees are consulted on planning applications and are involved in the preparation of the local plan (through the [Duty to Co-operate](#)).

NPPF says, “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

We can expect to see statutory consultees responding to planning applications seeking S106 contributions towards infrastructure provision where it meets the legal tests. We can expect to see developers scrutinise these to ensure they meet legal tests – as the market is challenging and finances are tight (the assumption that developers can ‘just pay’ any amount is not correct).

We are not expecting to see statutory consultees object to applications without very strong reasons to do so, and which will stand up to examination at a planning inquiry or local plan examination. If the LPA goes against the recommendation of a statutory consultee (for example chooses to refuse an application on highway grounds if the highways authority is satisfied with a S106 contribution), the LPA can reasonably expect to lose at appeal and have costs awarded against it.

We know there are many local infrastructure issues, that are repeated across the country (e.g. difficulty accessing GP appointments, little NHS dentist provision, traffic congestion etc). These are unlikely to stand in the way of the Government’s growth agenda. As such, the best we can do is ensure we have evidence in place of infrastructure projects that are needed, and ensure we secure S106 contributions towards them where legally possible.

35 What are the next steps for the Local Plan and when?

A [new Local Plan timetable](#) is in place (March 2025). This identifies our next step as Pre-submission consultation (Reg.19) stage, which is scheduled to happen in July 2026.

Key work is ongoing on evidence base and infrastructure provision in light of the increased numbers, with particular focus on the Transport Assessment and Integrated Impact Assessment (IIA).

We do not consider there are any legal issues with progressing to Reg.19 without further Reg.18 consultation. Four Reg.18 consultations have been done and any further would add considerable time to the process.

36 Why does it take a long time to produce a new Local Plan, particularly given the consequences of not having a new Local Plan in place?

The planning system remains 'plan led'. As such, Councils are required to have up to date Local Plans in place. The Government remains committed to Local Plans and has stated its intention to intervene if needed.

That said, the preparation of Local Plans is ultimately a legal process and needs to be done in accordance with process and legislation, to ensure it is sound and passes examination. Politics and local opinions add a further layer of consideration to their preparation. Local Plans are also expensive to prepare, so we need to make careful decisions. For example, preparation for Reg19 and examination will require external legal support (particularly a KC for examination) – we should not go to this stage unless we are confident we have prepared a sound Local Plan.

Four early-stage consultations have taken place to date on this new Local Plan, but during that time the national planning policy has changed as have Government initiatives and the Government itself.

The huge increase in the mandatory housing number means we need to look again at our evidence base and sites, ahead of the detailed and costly transport work that is needed to support a Reg19 Local Plan.

All of this has caused delays. Even those who are trying to submit local plans asap to align with transitional arrangements will not escape the new mandatory numbers eventually – as they will be required to immediately review their local plan.

37 How do the timescales for a new Local Plan compare to devolution timescales?

The Council is required to prepare a local plan for East Hampshire (outside the SDNP). The Government is pushing all Councils to progress plan making, and threatening intervention for those that don't. As such, devolution is not a reason to not progress the local plan. It is also currently unknown what strategic planning will look like following devolution, with more guidance expected later this year.

Based on our timescales, it's our understanding that devolution will not directly affect this emerging Local Plan. Devolution won't prevent consultation with town and parish councillors on this local plan.

38 What's happening in other councils? How are they responding?

We are aware that no Hampshire authority can demonstrate a 5YHLS and therefore the tilted balance is engaged when determining planning applications.

Our neighbour, Waverley borough, is also experiencing challenging times with regards to housing land supply. Waverley's biggest development, Dunsfold Park, has been removed from the five-year housing supply numbers - which means Waverley's Housing Land Supply stood at 2.68 years. However, the new figures in December increased Waverley's housing targets to more than 1,400 homes per year. When these numbers are applied, Waverley's deliverable housing supply drops to 1.4 years. Dunsfold Park gained planning permission in 2018 for 1,800 homes and includes the requirement for substantial upgrades to local infrastructure and services. Waverley's five-year housing land supply position statement says Dunsfold Park has been removed "until there is more certainty about the timescales for delivery of housing on the site." Waverley has received a planning application for 400 homes in the village of Alford, which is attracting a lot of local attention.

In terms of plan-making, all authorities are at different stages of producing a new local plan. However, the increased numbers need to be considered by all of them. For those who have recently submitted their local plans and do not meet the new mandatory housing needs, they will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need. From July 2026, an additional 20% buffer will need to be applied to such authorities housing land supply calculations.

39 How will the Council keep residents up to date on the Local Plan and the Government's continued changes to planning?

Residents will mostly have heard about the Government's growth and house building aspirations on the national news. However, the local impacts of this may still come as a shock.

The Council has repeatedly sent out comms about the NPPF consultation, and the new housing number. We will continue to do so where appropriate, but do not release comms about specific planning applications during the determination process. There will be further comms about the local plan.

The publication of these Q&As is part of the process of providing information for interested groups and residents.

There is also the opportunity to subscribe to Council [news releases](#), and follow the Council on social media.

40 Is there a market for all these new homes? Won't developers just land bank?

Developers may landbank, but it doesn't change the planning policy position. A planning application is valid generally for 3 years, until it lapses. Once commenced, the permission does not expire. There has been no historic evidence of 'land-banking' in East Hampshire. There are no known penalties for 'land-banking'.

We cannot enforce completion, although permissions that don't commence will not maintain their planning permission (usually permissions have 3 years to start before they expire). It is in our interests to encourage developments once permitted to progress, to assist with the output of the Housing Delivery Test. Our future Action Plan will set out ways to improve housing delivery.

41 If developers aren't building because the market isn't favourable to them, are we likely to see more developers citing viability reasons for not providing affordable housing?

Developers regularly look at the viability of their sites and, if they're encountering problems, they may seek to re-negotiate their planning obligations.

Joint Core Strategy Policy CP13 says, "The Policy allows flexibility to consider site specific factors, including market changes, viability and what is right for the community. If a developer is proposing a lower target than 40% then they will need to clearly demonstrate to the planning authority why such a variation is necessary. Independent third-party valuation expertise will be requested at the developer's expense."

Only when fully justified, or where other key strategic infrastructure is to be provided by the development and prioritised (supported by evidence) will the Local Planning Authority grant planning permission for schemes that do not provide the required amount of affordable housing. However, all contributions will be looked at in the round, and affordable housing remains a strategic priority.

In exceptional cases where it can be demonstrated that the provision of affordable housing on site will make the scheme unviable, the Local Planning Authority may accept a commuted sum in lieu of actual provision.

42 How do we count care homes towards the housing number?

Local planning authorities can count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, utilising census data. In East Hampshire, 2 bed spaces is approximately equivalent to one home. Therefore a care home for 60 bed spaces would account for 30 dwellings in terms of housing numbers.

43 How will we tackle the climate crisis through updating planning policies?

The Draft Local Plan 2024 included a suite of policies for tackling the climate emergency within future development (Policies CLIM1-CLIM5). Such policies would require steps to be taken to substantially mitigate the carbon emissions of renovated and new buildings, and to adapt the built environment to increasingly extreme weather events. Whilst the adopted local plan already includes policies to deliver sustainable construction, the policies of the Draft Local Plan represent a step change towards net zero carbon development. This is because knowledge of how to reduce the climate-related impacts of new development has improved since the current Local Plan was adopted, whilst recognition of the importance of tackling the climate emergency has increased. Updating the existing policies is important for delivering on the Council's commitments within its Corporate Strategy and its Climate & Environment Strategy.

There is an opportunity to demand greater reductions in carbon emissions through 1) improving the design and layout of new buildings, 2) increasing the efficiency of how buildings operate (e.g. space heating, power consumption) and 3) making better (i.e. lower embodied carbon) choices when selecting building materials. New streets, buildings and open spaces could also be better adapted to a warming climate through providing more space for trees and other planting, which can reduce the urban heat island effect, and through orientating and designing buildings to benefit from passive solar gain in the winter, whilst reducing the potential for over-heating in the summer. More detail on the kind of approaches that are suitable for tackling the climate emergency can be found in the Council's Climate and Sustainable Construction SPD.

That document is only guidance; a revised and updated Local Plan would have more weight for decision-making purposes and could better ensure that developers deliver the standard of development that is now required.

44 Whitehill & Bordon:

- **Will the Regeneration plan for Whitehill and Bordon be reviewed to accommodate more homes?**
- **The Master Plan suggests for each home built a job will be found. Will this aspect be retained for future development?**

Whitehill & Bordon, along with other Land Availability Assessment sites, will be considered, assessed and reviewed to see if further growth can be accommodated, which could involve future proposed housing. However, parts of Whitehill & Bordon are ecologically constrained by the Wealden Heaths Phase II Special Protection Area (SPA) (an International Designated Site protected for its ground nesting birds) therefore agreed appropriate avoidance and mitigation measures will be required within the 400 metre to 5km SPA buffer. Depending on the size of the development,

this could be in the form of bespoke Suitable Alternative Natural Greenspace (SANG) and supporting Strategic Access Management and Monitoring (SAMM).

The provision of additional employment land – which would support new job creation – will also be considered as part of any further allocation. The Draft Local Plan 2024 identified the potential for the development of additional employment floorspace in the north of the settlement, adjoining the enterprise zone. However, the environmental implications of its development will need to be balanced against potential employment benefits when reviewing this proposal for the next version of the Local Plan. The ambitions for new job growth will be aligned with findings of the Council's Housing and Economic Development Needs Assessment (HEDNA), which appraises the prospects for the local economy and the amount of employment land that the market is likely to be capable of developing over the plan period.

45 Planning Policy for Traveller Sites (PPTS) has changed too, what does this mean?

The Government has updated [Planning Policy for Traveller Sites](#), the national planning policy for Traveller accommodation, akin to the NPPF and with the same status.

The key change is to state "If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply".

This means the presumption in favour of sustainable development applies (as we cannot demonstrate 5 year supply of deliverable Traveller sites). This brings the consideration of Traveller accommodation in line with that for residential development. This change will make it more challenging to refuse applications for Traveller pitches on countryside land that does not benefit from national or European designations (e.g. Flood zone 3 or 400m from the SPA).

The other change is to the definition of a Traveller. In short, the change to the planning definition in the new PPTS essentially reverts to a single need figure by including need from all Travellers. Therefore, all need from undetermined households and from households that did not meet the 2023 definition will now form our 5-year target.

46 Given the tilted balance is engaged and a lot of speculative development is being proposed that may be difficult to refuse, what real purpose does planning committee serve?

As planning affects people's lives and private interests, it can be contentious. It is important that residents and applicants understand the system and have confidence in its integrity and transparency. Despite the

challenges around land supply and the presumption in favour of sustainable development, Planning Committee is still important as it plays a crucial role in providing democratic and transparent decisions on sometimes controversial issues.

Planning Committee only considers the tip of the iceberg when it comes to the volume of planning applications in the system and these are usually reserved for the locally significant or controversial applications

Also, it is not just housing proposals that come to planning committee, for example commercial, recreational or community schemes sometimes are brought to committee where the tilted balance does not apply.

47 What would Government intervention (under the terms of the NPPF) look like, if the Local Plan does not progress in time?

Our understanding is that decisions would be taken away from the Council if the Government 'intervened'.

48 Does the Council have the appropriate resource to progress the Local Plan and determine many more major planning applications?

The Council is working hard to ensure sufficient resources are in place to efficiently manage this step change resulting from the changes to planning policy. The Council seeks to fill vacancies in planning services, and will look to employ additional planners where needed.
