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East Hampshire District Council's Response to Waverley Borough Council Local Plan Issues and Options Consultation (Reg18) 2025

Introduction and Duty to Cooperate

East Hampshire District Council (EHDC) welcomes the opportunity to respond to Waverley Borough Council's Issues and Options Consultation.

As part of the Duty to Co-operate, we continue to work closely with Waverley Borough Council on Local Plan preparation. We have a signed Statement of Common Ground dated 2024, which was published in support of the East Hampshire Draft Local Plan consultation 2024. We value the constructive working relationship between our authorities and look forward to ongoing engagement as the Local Plan progresses.

Structure and content of the Consultation Document

EHDC commends the clarity and structure of the consultation document. The breadth of issues covered, from housing and infrastructure to climate resilience and environmental protection, demonstrates a comprehensive and thoughtful approach to plan-making. The articulation of spatial development opportunities and the challenges facing the borough is particularly well set out.

Housing need and Standard Method Challenges

We understand the challenge that has been presented to Waverley Borough Council by the publication of the NPPF in December 2024, and the increase in housing number, as East Hampshire is in a similar position. We understand that for Waverley Borough:

"The standard methodology is 1,458 dwellings per annum. Multiplied over the 20 year plan period this equates to 29,160 dwellings or a 50% increase in the existing dwelling stock in the borough and the equivalent of building a new Farnham and a new Godalming over the next 20 years."

In East Hampshire, we are having to respond to a 95% increase in housing number, to 1,124.

We also recognise the significant challenges the increased housing need presents, especially given the borough's extensive environmental and policy constraints. While we appreciate Waverley's view that the standard method figure is not realistic due to limited land availability, we agree that it remains the starting point for plan-making. Any future housing requirement must be fully justified and evidenced to meet the tests of soundness as set out in paragraph 36 of the National Planning Policy Framework (NPPF).

Similarly, EHDC is preparing a new Local Plan, with Regulation 19 consultation scheduled for summer 2026. We also acknowledge that the standard method is our starting point, and that we need to do everything we can to meet our housing need. In addition to our 95% increase in housing number, we are also facing requests for assistance with large amounts of unmet needs from neighbouring authorities.

Green Belt and National Landscape Considerations

The December 2024 changes to Green Belt policy underscore the importance of undertaking a robust and transparent Green Belt review. EHDC supports this approach and encourages Waverley Borough Council to ensure that such a review is evidence-led and considers the potential for sustainable development in appropriate locations.

We also note that National Landscapes (formerly AONBs) are not an absolute constraint to development. As highlighted in recent appeal decisions, including the recent decision in Waverley Borough (Haslemere, APP/R3650/W/3327643), major development may be justified in these areas where exceptional circumstances apply. Paragraph 190 of the NPPF provides the relevant policy context, stating that such development should be refused except in exceptional circumstances and where it can be demonstrated to be in the public interest. It is clear from the decision that the acute need for housing and insufficient supply of deliverable sites in Waverley Borough warrants such exceptional circumstances.

Appeal Decision Context and Implications

As is evident by the decision, not having an updated Local Plan in place has significant consequences in terms of speculative applications, when we are unable to demonstrate a five-year supply of housing. The Inspector stated:

“With that background the parties agree that the total supply is 1,998 and that the total five year shortfall is 5,777, and that there is a 1.28 year supply. The Council clearly cannot demonstrate a 5 year housing land supply against either the previous or current methods of calculation. It is uncontroversial that Waverley is one of the most expensive places to live outside London. It was suggested, though not fully evidenced, that average house prices are 17 times average incomes. There is also general agreement that there is an acute need for affordable housing, reflecting the national position.”

This extract from the appeal decision sets the scene and the ‘on the ground’ situation for Waverley Borough.

The inspector further stated *“It has been suggested that the scale of housing need, combined with a limited supply of sites, is such that housing need cannot realistically be met in full. In the context of this appeal, I do not have the evidence to conclude on this point. But even if that were the case, I do not accept the suggestion that this difficulty in meeting housing need should be used as an argument for downgrading the importance of the substantial shortfall.”*

This highlights that the scale of housing need will not be a valid reason to lessen the weight given to the shortfall of housing, which is likely to be relevant in the plan-making process.

Strategic Environmental Collaboration

EHDC is pleased to be working jointly with Waverley and the South Downs National Park Authority (SDNPA) on the development of a Strategic Access Management and Monitoring (SAMM) strategy for the Wealden Heaths SPA. This collaborative effort will be a vital component of both authorities’ Local Plans and will help ensure that growth is delivered in a way that protects our shared natural assets.

Vision and Plan Period

We are broadly supportive of the draft vision set out in the consultation document. However, we note the requirement in paragraph 22 of the NPPF that Local Plans should look ahead over a minimum of 15 years from the date of adoption.

Given the anticipated submission in late 2027, adoption is likely to occur in mid to late 2028. Based on advice EHDC has received from the Planning Inspectorate, this would necessitate an amended plan end date of at least 2044. This longer timeframe will provide flexibility to respond to unforeseen challenges and ensure the plan remains effective throughout its lifespan.

We also advocate for the plan period to begin as close to the present as possible, ideally from 1 April 2025, aligning with recent Inspector comments on the Winchester Local Plan.

Land Availability and Growth Strategy

EHDC supports Waverley’s recognition of the Government’s ambition to deliver 1.5 million homes by the end of the current parliamentary term. We also welcome the call for sites and encourage a proactive approach to land identification, including engagement with landowners and stakeholders to maximise the availability of suitable land.

While Map 2 illustrates the extent of designations that may constrain development, EHDC believes these should not be viewed as absolute barriers. Green Belt and National Landscape designations require careful consideration, but do not preclude development where justified.

As noted earlier, exceptional circumstances may warrant development in constrained areas, particularly where acute housing need and limited deliverable land are evident.

EHDC supports the principle that the majority of growth should be directed to higher-order settlements within the settlement hierarchy, given their capacity to accommodate development and provide access to services and infrastructure. However, we also advocate for continued growth in smaller settlements to support local services, schools, and the provision of affordable housing, thereby maintaining the vitality and viability of rural communities.

Given the scale of housing need, EHDC considers that new settlements should be explored, particularly those located near railway stations to promote sustainable travel. A range of site sizes should be considered to improve delivery rates and bolster housing land supply. We support the inclusion of all five growth approaches outlined in the consultation, as a diversified strategy will be essential to meeting housing needs effectively.

In addition, higher densities should also be considered where appropriate, particularly in locations with good access to services and sustainable transport options.

As part of the plan-making process and allocating of sites, we encourage consideration of infrastructure that is on our shared boundaries. We note the joint CIL funding of the new Rowledge village hall and would like to continue the dialogue on infrastructure as we prepare our Infrastructure Plan to support the Regulation 19 consultation.

Gypsy and Traveller Accommodation

There is little reference to Gypsy and Traveller accommodation in the document, other than para 5.10 and para 5.11 which says, “All local planning authorities are expected to make their own assessment of need and to develop fair and effective strategies to meet need, including ensuring there are sufficient authorised plots and pitches. Our new Plan should include fair, realistic and inclusive policy measures that have due regard to the protection of local amenity and local environment.” And one question in the questionnaire.

For other topics there is data and statistics, or reference to evidence base. It would be helpful for those responding to clarify what evidence base is available in relation to this topic and whether any updates are planned, and how that relates to the Local Plan.

To confirm, the East Hampshire Gypsy and Traveller Accommodation Assessment is dated 2024. Our need for Traveller accommodation (including Travelling Showpeople

accommodation) is higher than we can likely accommodate. We have corresponded previously with our neighbouring Councils about this and will continue to do so as we progress to Regulation 19 consultation.

Climate Change and Energy Efficiency

Finally, we note that Waverley Borough Council declared a climate emergency in 2019 and set ambitious targets to become carbon neutral by 2030. EHDC supports the need for a robust strategy to mitigate the impacts of climate change. This will require detailed evidence on viability and delivery, particularly in relation to achieving higher energy efficiency standards beyond those set out in the Future Homes Standard.

Conclusion

We look forward to continuing our positive engagement with Waverley Borough Council, which includes your continued co-operation and joint working on the Duty to Co-operate Framework (2025). Collaboration is vital for contributing to the development of a sound and effective Local Plan.

Please note that this response has been endorsed by Cllr Angela Glass, the portfolio Holder for Regulation and Enforcement.