

East Hampshire Local Plan 2021-2040
Issues and Priorities (Regulation 18 Consultation – Part 1)

Comments by Beech Parish Council – 19th December 2022

Beech Parish Council may be contacted at:

Mrs Louisa Thomson – Parish Clerk
Old Stables, Wield Road, Medstead, Hampshire, GU34 5NJ

Email: clerk@beechpc.com

Local Plan 2040 Vision

VIS1 How do you feel about this vision? **Unsure**

VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform? **No**

VIS2a If no, please tell us what is missing from the vision and why this is important.
Communities should be “healthy, accessible, well-connected and inclusive”. The ability to travel easily, with adequate transport infrastructure is important.

VIS3 Should the vision be more specific about areas of the District being planned for through the Local Plan? **No**

VIS3a Please explain your answer. **The geographical scope of the Plan is made clear elsewhere.**

Issues and priorities

OV1 Please rank these key issues and priorities in order of importance to you.

<u>Issue</u>	<u>Rank</u>
Climate Emergency	1
Population and Housing	1
Types of Housing Needs	1
Environment	1
Infrastructure	1

As a parish council, all of these are important to us and we would not wish to compromise on any one issue in favour of another.

The Climate Emergency

CLIM1 Do you agree that new development should avoid any net increase in greenhouse gas emissions, wherever practicable? **Yes**

CLIM2 What's most important to you? Please sort in order of importance to you.

	Rank
That the construction of new buildings should use less fossil fuels and more recycling of materials	3
That all new buildings should be zero carbon	1
That every new development should have renewable energy provision and that any wind or solar development must be inkeeping with the locality and its surroundings	2
That climate change policy should clearly identify the impacts on water availability, with water consumption being reduced in new developments, including by reusing it on site	5
That trees and other green infrastructure could play an important role in reducing flood risks	4

Defining 'Net Zero Carbon Development for the East Hampshire Local Plan

CLIM3 Do you agree that the Council should define 'net-zero carbon development' in this way? **Yes**

CLIM3a If you answered 'no', how should the definition be improved?

The Energy Hierarchy as an approach to mitigation

CLIM4 In the future, should the Council's policies on the design of new buildings focus more strongly on tackling climate change in accordance with the energy hierarchy? **Yes**

CLIM4a If you answered 'no', how should we balance the design of new buildings with the need to tackle climate change?

Adapting to a changing climate

CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following?

	<u>Yes?</u>	<u>No?</u>
In the emerging East Hampshire Local Plan	Yes	
In future neighbourhood plans	Yes	
In local design codes		No

CLIM5a Please can you explain your answer.

Let's not create any more planning documents. Let's keep the Local Plan as the definitive document for EHDC planners, and Neighbourhood Plans the definitive document for town and parish councils.

Emphasising accessibility on foot and by bike

CLIM6 How do you feel about using the idea of living locally to influence the location of new homes? **Unhappy**

CLIM6a Please explain your response.

The "20 mins" concept is of limited value in a rural area like East Hampshire (as opposed to in larger towns and cities). Having facilities 20 mins away by bike isn't much use to someone who is physically unable to cycle; only "within 20 mins on foot" is of universal use. But all villages will be more than 20 mins away on foot from facilities in larger centres, so the concept isn't really of much use at all to villages. The concept is, however, very relevant within Alton and within

Whitehill/Bordon (which have a wide range of facilities), and can usefully act to prevent far-flung urban sprawl.

Environment

ENV1 Which of the below environmental considerations is most important to you? Sort in order of importance.

	<u>Rank</u>
• Achieving improvements to local wildlife habitats.	1
• Protecting the most vulnerable existing protected habitats and species.	1
• Conserving the character of rural landscapes.	1
• Creating better natural links between existing habitats.	1

As a parish council, all of these are important to us and we would not wish to compromise on any one aspect in favour of another.

Population & Housing

How is Housing Need calculated?

POP1 Please select how you think we should proceed:

- Use the standard method for calculating housing need as the basis for determining the requirements against which the five-year housing land supply and Housing Delivery Test are measured.
- Further explore whether exceptional circumstances exist to be able to devise a revised local housing requirement. **Take this option**

POP1a Please explain your answer.

It appears that the Levelling-Up & Regeneration Bill will now permit LPAs to reduce housing numbers (below the result derived from the standard method) if there are exceptional circumstances (such as constraints imposed by national parks). And the 'duty to co-operate' is to be removed.

The standard method may still be an appropriate basis of calculation across the entire district. But 27.5% of the calculated need should be assigned to the part of the district within the SDNP, to match the proportion of the district's population that lives in the SDNP area (this would mean 174 new homes p.a. in the SDNP, rather than c.115). This would spread development on an equitable basis for the entire district's population. Continuing underprovision of new housing for the population in the SDNP will only serve to increase house prices in the SDNP, exacerbating the affordability problem there and increasing the district's overall housing need in a self-reinforcing cycle.

Local Housing Needs

POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the local plan? **Yes**

POP2a Please explain your answer.

It appears that the Levelling-Up & Regeneration Bill will now permit LPAs to reduce housing numbers (below the result derived from the standard method) if there are exceptional circumstances. And the 'duty to co-operate' is to be removed.

Even if the standard method were to be used in respect of the entire district (632 new homes p.a.), we believe that the assignment of 517 new homes p.a. to the LPA is the result of a flawed calculation, as follows.

In the 2022 HEDNA, the consultants attempt to split of the district-wide 632 new homes p.a. between the LPA and the SDNP. When calculating the household growth figure in each sub-area, the consultants assumed that the future population growth rate in the LPA will be double the growth rate in the SDNP (paragraphs 5.44 and 5.45). This is based on the relative population growth rates observed in the period 2011-2020. But for most of that period (certainly since the MOU signed between EHDC and SDNPA in 2015) the LPA area was explicitly building extra houses to meet a significant proportion of the SDNP's housing need, which in turn must have been a significant contributing factor to the higher population growth in the LPA in 2011-2020. In other words, the historical population base data used by the consultant is skewed, in that it reflects the deliberate displacement of housebuilding from the SDNP to the LPA. The historical base data reflects the SDNP not meeting its own housing need, and so (logically and inevitably) the numbers resulting from calculations extrapolating that historical base data (i.e. only 115 p.a. for the SDNP) cannot reflect the SDNP meeting its own housing need in the future. Skewed data input means skewed data output.

In our view, this completely invalidates the 517/115 split of the 632 new homes p.a. housing need figure. In our view the most sensible and reasonable way to split the 632 number (or any other substituted district-wide number) is on a proportionate population basis, i.e. SDNP 174 p.a. (27.5%), LPA 458 p.a. (72.5%). If the LPA and the SDNP were each to accommodate their own housing need in full, we don't see any credible reason why East Hants population growth rates in the SDNP and the LPA would differ. In the HEDNA, the consultants themselves confirm that the entire district is a single Housing Market Area, which implies that assigning differing population characteristics to the SDNP and LPA is an artificial concept.

In addition the Local Plan should be made flexible enough to take into account changes (during its term) to housing need figures brought about by:

- Affordability improvement following house price movements (better affordability = reduced new housing need);
- A change to the need calculation methodology mandated by Government;
- Changes to any co-operation agreements with neighbouring planning authorities;
- Abolition by Government of top-down housing targets (which appears to be happening already).

In practical terms this means deferring the nomination of named housing sites that would be developed more than, say, 10 years in the future, to permit future reductions to housing need to be accommodated.

South Downs National Park (SDNP)

POP3 Should we meet:

- All the housing needs of East Hampshire's part of the SDNP.
- Some of the housing needs of East Hampshire's part of the SDNP.
- None of the housing needs of East Hampshire's part of the SDNP. **Take this option**

POP3a Please explain your answer.

It would seem that the Levelling-Up & Regeneration Bill will remove the 'duty to co-operate' with the SDNP. The SDNP should be obliged to take their full allocation of 174 new houses p.a. calculated as from 2021, 27.5% of the total district housing need (i.e. proportionate to the

population living in the SDNP). Otherwise the SDNP constrains some of the more sustainable site options around our larger settlements (Alton, Liphook, Horndean, Four Marks) and so forces development onto non-SDNP greenfield sites that are, in reality, of equal landscape value to the SDNP.

Unmet needs of other planning neighbours

POP4 At present we do not know the precise amount of unmet need but we are aware of our neighbours seeking help, therefore do we:

- Offer to assist with all unmet needs, regardless of scale and location.
- Offer to assist with some unmet needs, where there may be a direct relationship with the communities of East Hampshire.
- Do not offer to assist with any requests from our neighbours. **Take this option**

POP4a Please explain your reasons.

It would seem that the Levelling-Up & Regeneration Bill will remove the 'duty to co-operate' with neighbouring LPAs. In any case, LPAs with brownfield sites should be the ones offering help to neighbours. East Hampshire doesn't have much in the way of brownfield sites, so any unmet needs of others would only be met by even more greenfield development in East Hants, which is not acceptable. In fact, if the SDNP continues to fail to take its fair share, it is some of our more urban neighbours, with more brownfield sites, who should be meeting some of East Hampshire's housing need.

Types of Housing Needs

Ageing Population and Older Persons Accommodation

HOU1 What should a specific policy on older persons accommodation include?

- A specific target in terms of numbers of homes for older persons accommodation to be delivered within the plan period.
- Specific types of homes to be provided.
- The location of these homes across the District.

All of these

HOU1a Please explain your reasons.

There needs to be a good spread of all types of older persons' accommodation right across the district, to cater for a range of needs:

- **Accessible houses/bungalows for independent living**
- **Sheltered housing (with warden oversight) for semi-independent living**
- **Residential care homes**
- **Nursing care homes**

HOU2 Is there anything else that should be included in this policy?

- **Associated green space (grounds & gardens) and security measures.**
- **Taking proper account of the contribution to housing made by residential and nursing homes (i.e. a 50 bed new care home counts the same as 50 new houses/flats in the context of new housing provision numbers).**
- **Suitable and convenient transport links associated with accommodation for older people.**

Housing Needs of Disabled People

HOU3 Should the Local Plan include a specific policy on adaptable housing? **Yes**

HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable? **Yes**

HOU4a Please explain your answer.

Primarily there needs to be a requirement on most (or all) sites that have good and/or close access to facilities and services (which is especially important for disabled people), not necessarily just on large sites. This may mean that a particularly accessible site could have a large % of adaptable housing. It is site accessibility, not site size, that is the most important factor here. Ideally all large sites would be made highly accessible to facilities and services.

Home Sizes and Mix

HOU5 Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? **Yes**

HOU5a If yes, should this percentage focus on:

- 1-2 bed homes **This one**
- 2-3 bed homes

HOU6 Should a percentage of smaller homes to be provided on:

- All development sites or
- Only large development sites (over 10 units) **This one**

HOU6a Please explain your answers.

Smaller houses should be grouped together. Try to avoid having one or two small houses within a group of up to 10 larger houses – it would be incongruous.

Affordable Housing

HOU7 The current requirement is that 40% of new homes on qualifying sites are affordable homes. Should the % requirement for affordable homes be:

- Increased
- Decreased
- Stay the same **This one**

HOU7a Please explain your answer.

40% is a relatively high proportion, but unfortunately is likely to be negotiated downwards by developers on many sites. 40% may be as high as developers can be pushed if they are not going to be put off continuing with the development. (Although there may be some smaller sites, like rural exception sites, where 100% affordable housing is justifiable and achievable).

Other forms of housing

HOU8 There are other forms of housing that we are required to consider and plan for if needed, including self and custom build plots and Traveller accommodation. Are there any other forms of housing that the Local Plan should refer to? **Yes**

HOU8a If yes, please state.

- Seasonal agricultural workers (housing on farms)
- Holiday cottages/hotels/other tourist accommodation
- Conversion of office and retail buildings to houses/flats

Development Options

DEV1 Please rank these options in order of preference

	<u>Rank</u>
• Option 1: Disperse new development to a wider range of settlements	1
• Option 2: Concentrate new development in the largest settlements	3
• Option 3: Distribute new development by population	2
• Option 4: Concentrate development in a new settlement	4

DEV2 Why have you ranked the options in this way?

We like Option 1 because it probably means that Alton can expand without the excessive sprawl that would be implied by Option 2 (and to a lesser extent by Option 3). Option 4 would mean a completely new settlement location, totally greenfield, probably in the Northwest of the district on high value farming land (because of heathland and other environmental constraints elsewhere), and possibly creating the unwanted “A31 conurbation” of a string of settlements separated by negligible gaps.

DEV3 Are there any alternative options we should consider? **No**

DEV3a If yes, please explain.

Infrastructure

INF1 What type of infrastructure is most important to you? Sort in order of importance.

	<u>Rank</u>
Transport	1
Health	1
Schools, colleges	1
Community facilities	1
Sport	1
Green spaces	1
Energy supplies and water	1
Internet and mobile phone reception	1

We consider that adequate provision of all of these types of infrastructure is absolutely essential in a modern civilised community, and so they cannot be differentially ranked.

INF2 How do you feel about the allocation of CIL funds to date? **Happy**

INF3 Which of these do you think provides the best outcome for infrastructure provision?

- Many small sites dispersed across the district
- Medium sized sites
- Large sites
- A mix of these **This one**

INF3a Please explain your answer

So long as EHDC maintains a well-controlled and predictable process for assigning CIL funds then the appropriate infrastructure provision can be planned for sites of all sizes. This means EHDC working with the developers of small and medium sites on the appropriate use of the developer's CIL contributions at the development planning stage.