Draft response to EHDC's public consultation on the emerging local plan, deadline for submission 16 January 2023

All the documents are here: https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/local-plan-consultation

See in particular "Local plan issues and priorities regulation 18 part 1"

The text below in black is pasted from the consultation. Text in red is PeCAN's response as submitted on 16 January 2023.

Vision
To provide clarity on the type of place East Hampshire is anticipated to be, and what it will seek to achieve from development, the Local Plan should set out a vision. The vision should be ambitious, but achievable.

"By 2040 our residents will live in healthy, accessible and inclusive communities, where quality homes, local facilities and employment opportunities provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency."

Vision consultation questions
VIS1 How do you feel about this vision? (very happy / happy / neutral / unhappy / very unhappy)
VIS2 Does the vision cover the key matters of importance that the Local Plan can influence and inform? (Y/N) **VIS2a** If no, please tell us what is missing from the vision and why this is important.
The vision contains important elements but lacks the climate and nature ambition to support the "greenest ever" Local Plan. For example, it does not mention the nature crisis or the need to reduce greenhouse gas emissions, the words "respond positively to the climate emergency" suggest only a modest improvement, and the reference to quality homes and green places does not include low emission buildings.
It could be re-worded in a more ambitious and inspiring way. For example see the vision statement in the Cambridge City and South Cambridgeshire District Councils' Local Plan:
"We want Greater Cambridge to be a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities. New development must minimise carbon emissions and reliance on the private car; create thriving neighbourhoods with the variety of jobs and homes we need; increase nature, wildlife and green spaces; and safeguard our unique heritage and landscapes."
.
VIS3 Should the vision be more specific about areas of the district being planned for through the Local Plan? (Y/N). **VIS3a** Please explain your answer.

The vision could refer to the precious landscapes and habitats in our district that need protecting.

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

Climate Emergency 1
Environment 2
Infrastructure 3
Types of Housing Needs 4
Population and Housing 5

Climate Emergency consultation question
CLIM1 Do you agree that new development should avoid any net increase in

greenhouse gas emissions, wherever practicable? (Y/N)
CLIM2 So far, you've told us the following - but what's most important to you? (Sort in order of importance).

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 the construction of new buildings should use less fossil fuels and more recycling of materials 3
That trees and other green infrastructure could play an important role in reducing flood risks 4
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

A best-practice definition is considered to be one whereby:
• The energy consumed by a building's occupants is taken into account and reduced as far as possible. This would mean considering all of the energy consumed, not only that which is regulated by the Government's Building Regulations;
• The remaining energy demand is met with the equivalent amount of renewable power generation, either onsite or offsite;
• The remaining carbon dioxide emissions that are associated with a building (e.g. through making or obtaining its building materials) are estimated and reduced, wherever practicable.

Climate Emergency consultation question
CLIM 3 Do you agree that the Council should define 'net-zero carbon development' in this way? (Y/N)
CLIM3a If you answered 'no', how should the definition be improved?

PeCAN broadly supports the definition but have selected 'no' so that we can suggest some tweaks: to exclude fossil fuels, to ensure additionality of new renewable energy, and to strengthen the treatment of embodied carbon.

We agree that the definition should include unregulated energy use; this would encourage building designs that cater for all energy use, including EV charging.

We would like to see the first bullet point amended to exclude fossil fuels completely for new buildings, for example by adding the words "including no onsite combustion of fossil fuels" to the end. Alternatively, the text could be amended to refer to emissions from energy as well as primary energy use, for example: "The GHG emissions from energy consumed and the amount of energy consumed … are reduced as far as possible".

We support the idea that new buildings should not be connected to the gas network: full decarbonisation of heating will require electrification so any gas connection would be an unnecessary expense, while experts are starting to agree that hydrogen heating via the gas network is probably not going to be viable (see House of Commons Science and Technology Committee, "Hydrogen is not a panacea for reaching Net Zero, warn MPs", 19 December 2022). As viable technologies to heat homes without fossil fuels already exist, this should become a planning requirement as soon as possible.

The second bullet point seeks to match the additional energy demand created by new buildings with renewable energy generating capacity. Since planning rules cannot easily govern the choice of energy tariffs by future occupants, we assume that the intention is to match new demand with newly installed renewable energy generating capacity, on or offsite. If so, we support the idea as a planning principle and can imagine it would increase local resilience and energy self-sufficiency (even though seasonal variations would mean developments will still need access to the electricity grid). For this principle to be effective, new build approvals would need to require the developer to build or commission additional onsite or offsite renewable generation up to the expected energy demand of the development (above what can be produced onsite). This, in turn, would need to be facilitated in

the Local Plan by identifying suitable sites and policies for solar farms etc.. To ensure additionality, developers should have to build or commission the additional offsite generation themselves and not be allowed simply to purchase carbon credits or to provide financing to third party solar projects that would have gone ahead anyway.

The East Hants proposal on operational emissions is similar to one in the Winchester City Council's draft Local Plan, with the difference that for WCC all new generation must be onsite, which raises the question whether EHDC's offsite option is even necessary (WCC draft Local Plan, policy CN 3 'Energy efficiency standards to reduce carbon emissions' says "Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting" https://winchester.citizenspace.com/policy-and-planning/local-plan-regulation-18/supporting_documents/Regulation%2018%20Local%20Plan.pdf)

Some basic technical guidelines may be needed to control this, for example to clarify over what time period to measure generating capacity and demand and how to treat factors such as generating efficiency, time of use, and storage availability.

We welcome the inclusion in the third bullet point of emissions from building materials, i.e. embedded emissions. We support the idea of requiring whole life cycle non-operational emissions to be estimated in advance, especially for larger developments. While for methodological reasons it may be too soon to make low embodied carbon a mandatory requirement, making these estimates public through the planning process should create positive incentives. In the absence of fixed guidelines for measuring embodied carbon and the likelihood that sustainable construction techniques will improve over the life of the Local Plan, we wonder if it is possible for the policy to be written in a way that allows it to stay current when talking about the estimation and disclosure of whole life emissions, and the use of techniques and materials that minimise embodied emissions, for example by referring to best efforts and current industry best practice?

The third bullet point could be strengthened to steer applicants towards carbon negative design, for example by amending the text to ensure that the building's non-operational (or embodied) emissions "… are estimated and reduced as much as possible including by sequestering carbon in the building itself (such as through the use of timber and other organic materials that can help to make buildings carbon negative)", or similar wording.

We welcome that the proposed net zero definition does not feature carbon offsets and rightly focuses on preventing emissions in the first place or, for residual operational emissions, on matching new demand with new renewable supply.

In response to the question in the Climate Change background paper, top of page 8, we do not think that offsite reductions in energy use, for example by paying for energy efficiency measures elsewhere, are suitable as a "last resort" offset to reach net zero because (i) it would be difficult to prove equivalence between the residual energy usage and related emissions in the new development and the energy use and emissions avoided elsewhere, (ii) in carbon accounting terms, avoided emissions do not recoup prior emissions, (iii) it would undermine the energy hierarchy by allowing developers to pay for energy efficiency elsewhere instead of reducing emissions at source, and (iv) it is impossible to know whether the offsite energy efficiencies would have happened anyway and are therefore additional.

Climate Emergency consultation question

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? (Y/N)

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

PeCAN supports the use of the energy hierarchy and hope that planners can find a way to enforce its sequential application and create policies that make it difficult for developers to skip to the bottom layer.

Renewable energy generating technologies could be defined broadly to include technologies such as microgrids, energy storage, community energy projects and district heating.

Where offsets are used as a last resort, for them to count as net zero they would need to fund the permanent sequestration of prior emissions and not the avoidance of future emissions (i.e. trees and direct capture - yes, paying for renewables or energy efficiency elsewhere - no).

We would distinguish between policies that seek to remove residual GHG emissions as an offset, and policies that try to match new energy demand with new energy production (see answer to CLIM3a). In the first case, the outcome would be assessed by how much carbon has been removed versus how much has been added. In the second case, matching energy demand and supply, the outcome would need to be assessed by the amount of clean electricity that can be generated versus the additional demand.

Climate Emergency consultation question
CLIM5 Should the detailed criteria for tackling climate change be specified in any of the following:

In the emerging East Hampshire Local Plan Y
In future neighbourhood plans Y
In local design codes Y
CLIM5a Please explain your answer.

The different planning documents should be coherent with each other in regard to climate goals and avoid creating opportunities to challenge or circumvent climate related policies, while allowing for different levels of detail.

Design Codes and Neighbourhood Plans should be required to consider the climate and nature crises and they should include climate and biodiversity goals. They should explain how any possible trade-offs between aesthetic and environmental goals should be resolved, such as by recommending more sensitive implementation of technologies (roof-integrated vs roof-mounted solar PV, window frame materials and design, placement of water butts and equipment etc.).

Climate Emergency consultation question
CLIM6 How do you feel about using the idea of living locally to influence the location of new homes? (Very happy / Happy / Neutral / Unhappy / Very unhappy).
CLIM6a Please explain your response.

PeCAN supports the idea of 20-minute neighbourhoods and welcome the recognition that reducing distances travelled is a key part of reducing transport emissions (i.e. not only focussing on EVs). We would welcome:

- a commitment to integrate land-use planning with transport planning, so the Local Plan can ensure that new developments are on sites that can be accessed by walking and cycling;
- Active Travel policies in the Local Plan (e.g. to promote cycle and walking routes, secure parking areas, e-mobility charging etc.);
- an opportunity for us and other community groups to contribute to the further development of the LCWIP.

We believe that a safe, accessible, and well-connected movement network for pedestrians and cyclists plays a key part of all high quality and successful neighbourhoods, as well as helping to reduce carbon emissions and to improve the health of residents by encouraging physical activity.

The key tenets of the 20-minute neighbourhood concept should play a major role in site selection. Providing ready access to services without resorting to private car use is important. The consideration of walkable distances should be given priority when identifying sites. We are aware of some of the complexities of delivering 20-minute neighbourhoods within the planning process, nevertheless we would encourage you to proceed. A recent report by Sustrans spelt out some of the difficulties, see Sustrans, Walkable Neighbourhoods, May 2022. In East Hampshire and in other places, we have observed new housing developments which are too far away from existing services but are too small to justify bus services and other amenities. Hence, we wish to ensure that the mistakes of the past are not repeated.

Clearly 20-minute neighbourhoods are not “islands”. They need walking and cycling (or public transport) connections to a wider town or village. Delivering 20-minute neighbourhoods involves a detailed understanding of the opportunities and challenges for these connections in a particular place. Ideally a mature Local Walking and Cycling Infrastructure Plan (LCWIP) for East Hampshire would be available to provide information about the opportunities and challenges for walking and cycling connectivity for the settlements in East Hampshire. However, we anticipate that the immaturity of this document may cause difficulty when delivering 20-minute neighbourhoods, unless urgent progress is made. We note that work started on this document 5 years ago but that it remains under development, as acknowledged in HCC’s progress update on LCWIPS (dated 7th November 2022). We are aware of some limitations with this document that have not been acknowledged. We would welcome an opportunity to discuss how the LCWIP for East Hampshire may be improved such that it can be used to help to deliver 20-minute neighbourhoods.

It is well documented in nationwide surveys that people are reluctant to routinely cycle, and to some extent to walk, if they feel unsafe when doing so (this was confirmed in the local survey reported in the LCWIP for East Hampshire). Many local roads and crossings feel unsafe for walking and cycling, as demonstrated by evidence set out in the LCWIP and elsewhere. This includes some parts of designated cycle routes (62% of on-road sections on the National Cycle Network have been rated as “poor”, see: Sustrans, Paths for everyone, Sustrans’ review of the National Cycle Network, 2018). Developers cannot be expected to design the onward walking and cycling connections beyond their sites but they can support them in their design.

As developments where cars are used less would need less car parking, we wonder if this extra space could be allocated for green infrastructure.

Population and Housing consultation question
POP1 How you think we should proceed? (select one option):
• 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
POP1a Please explain your answer.

PeCAN supports meeting the demographic housing needs of the district and policies to make housing more affordable. However, as explained below, we do not see how the over-construction of new private housing units would contribute to either of these goals. We therefore hope EHDC can use the recent government change of policy on housing targets to establish a housing target that meets the community’s demographic needs without adding unnecessary construction that harms the environment.

The government recently U-turned on mandatory housing targets, after a rebellion by Conservative backbench MPs: “Housing targets should be scrapped, because they are undermining local control over planning decisions and creating pressure for development, which is damaging to the local environment and to the quality of life of our constituents,” said Teresa Villiers MP in the House of Commons, after tabling an amendment to the draft Levelling-up and Regeneration Bill (https://bills.parliament.uk/bills/3155/stages/17044/amendments/10003228).

The government responded on 5 December 2022, saying that "housing targets remain, but are a starting point with new flexibilities to reflect local circumstances" and the government would consult on how these can better take account of local density (see https://www.gov.uk/government/news/communities-put-at-heart-of-planning-system-as-government-strengthens-levelling-up-and-regeneration-bill).

We do not know yet how those flexibilities will operate. However, for East Hampshire we note that the overall housing need has been calculated at 632 new homes per year, of which only 381 reflect predicted demographic changes and 251 reflects an uplift for ‘market signals’, i.e. to over-build by 251 units a year in the hope that this will lower house prices in East Hampshire.

The construction of 251 surplus homes would increase the housing stock in East Hants by a little under 0.5%. The OBR estimates that each 1% increase in housing stock reduces house prices by around the same percentage (Working Paper No. 6, July 2014, chart 3.2). Assuming this also applies in East Hampshire, reducing local house prices by less than 0.5% a year will not be any help for first time buyers who face an all-time high affordability ratio of 14.51x earnings (up from 5x in the 1990s).

Instead, we hope national policymakers will tackle the affordability crisis by promoting a better mix of tenures with more social and affordable housing, and by enacting mortgage reforms, which the OBR says are up to eight times more effective in reducing house prices than increasing the supply of new homes, among other things (for more on reforms that could improve housing affordability, see the report by Positive Money, 'Banking on Property', March 2022).

We also note that the 2021 census shows that the average number of households in East Hampshire increased by 11.5% since 2011, faster than the 8.7% increase of population, while the average number of people per household fell from 2.45 in 2011 to 2.39 in 2021. Comparing the 2021 census data on households with the government’s Live tables on dwelling stock (Table 100) shows that there was already a surplus of more than 2000 dwellings over households in East Hampshire in 2021. Taken together, these data suggest that if there is a barrier to household formation in East Hants, it is not caused by a lack of supply.

An option that we would support for the Local Plan is therefore to adjust the target to meet the demographic need, i.e. 381 across the district, or 319 in the Local Plan Area.

Population and Housing consultation question
POP2 Are there any strong reasons not to use the housing need figure of 517 new homes per year for the Local Plan? (Y/N)
POP2a Please explain your answer.

PeCAN thinks the government’s new flexibility around housing targets should be used to reduce this number from 517 to 319 by removing the ‘market signals’ uplift in full (see answer above).

If the uplift must be retained to some degree (which we hope it won’t), then it should be based on different, perhaps more up to date, data to avoid locking in a historically high affordability ratio for the duration of the plan.

The affordability uplift used is 166%, based on ONS 2022 median affordability ratio of 14.51 which itself is based on data up to September 2021. This data point is after the pandemic pushed house prices up but before the increase in interest rates started to push prices down. House prices nationally

are now falling: Nationwide reported in December 2022 that house price growth had fallen for four months in a row and predicted a further 5% fall in 2023. In addition, inflation is likely to increase wages in future, which would tend to reduce the affordability ratio, meaning that the 14.51 affordability ratio from September 2021 could overstate affordability over the next ten years. Updating the data even by a few months would reduce the target by a meaningful amount. For example, using a median house price of £470,715 (East Hants, Aug 2022, Land Registry, Alton Herald) and average earnings of £35,914 (East Hants, FY 2021, ONS ASHE Tables 9 and 10), gives an affordability ratio of 13.10, which reduces the adjustment factor from 166% to 156% and the overall target from 632 to 598. Alternatively, using a pre-pandemic (2020) affordability ratio of 12.31 would reduce the overall target from 632 to 579, before splitting between the Local Plan Area and SDNP.

That said, we feel that a sensible approach in light of the new flexibilities would be to base the housing target on actual predicted demographic need, i.e. the 381 homes per year needed to satisfy predicted growth in households from 2022 to 2032, of which 319 would be needed in the Local Plan Area and the remainder in the SDNP.

Any numerical reductions that can be achieved would reduce the environmental and climate costs associated with building new homes for which no demographic need or benefit has been demonstrated, while ensuring that enough new homes are built to meet demographic needs in the district.

Population and Housing consultation question
POP3 Based on the above should we meet:
- All the housing needs of East Hampshire's part of the SDNPA
- Some of the housing needs of East Hampshire's part of the SDNPA
- None of the housing needs of East Hampshire's part of the SDNPA

(select one option)
POP3a Please explain your answer.

A split between the two areas seems reasonable.

Population and Housing consultation question
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: (select one option)
- 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.

POP4a Please explain your reasons.

PeCAN suggests that any offers to assist neighbours with their unmet housing needs be limited to considering only their demographic needs, not their housing target based on market signal uplifts.

If the unmet needs at neighbouring LAs have been calculated using affordability uplifts for market signals, they are likely to overstate the demographic need because the targets will have been artificially inflated to reflect the market signals uplift in the Standard Method (see answers above). The benefit of helping neighbouring LAs would thus be administrative, allowing them to comply with centrally set targets rather than meeting actual demographic housing needs, while the environmental costs for East Hants in building more homes would be very real and not justified by any actual housing need.

Given the recent announcement from the government to move away from mandatory housing targets, this should be an opportunity to focus on the housing that is needed while preventing environmentally harmful over-construction.

Types of Housing consultation question
HOU1 What should a specific policy on older persons accommodation include?
(select one or more options)

• 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
HOU1a Please explain your reasons.
HOU2 Is there anything else that should be included in this policy?

Types of Housing consultation question
HOU3 Should the Local Plan include a specific policy on adaptable housing? (Y/N)
HOU4 Should there be a requirement on large sites for a percentage of new homes to be adaptable?(Y/N)
HOU4a Please explain your answer.

As with all buildings, the more adaptable they are, the less structural renovation and new construction would be needed to facilitate a future change in use or need, which should save both costs and carbon emissions in future. For example, two-bedroom homes are more adaptable than one-bedroom homes.

Types of Housing consultation question
HOU5 Should the Local Plan include a policy to specify the percentage of smaller homes on development sites? (Y/N)
HOU5a If yes, should this percentage focus on:
• 1-2 bed homes
• 2-3 bed homes (select one option)
HOU6 Should a percentage of smaller homes to be provided on:
• All development sites or
• Only large development sites (over 10 units) (select one option)
HOU6a Please explain your answer.

Types of Housing consultation question
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 (select one option)
HOU7a Please explain your answer.

Affordable homes on average have fewer bedrooms than market homes (HEDNA 2022 table 9.14 to 9.16). This is not ideal because households that need fewer bedrooms do not always need an affordable home (e.g. 'empty-nesters' or smaller, more affluent households) while those who do need affordable homes may also need more bedrooms (e.g. young families).

The mismatch could increase travel emissions by causing families to live further away from their jobs, families and friends in order to find affordable housing.

It could therefore be useful for the planning authority to track and seek to increase the overall number of affordable family homes in the district, in addition to the percentage of newly built homes that are deemed affordable.

We appreciate that the definition of "affordable" (linked to house prices and not income levels) is a national policy issue.

Types of Housing consultation question
HOU8 Are there any other forms of housing that the Local Plan should refer to? (Y/N)
HOU8a If yes, please state what other forms of housing.

Environment consultation question
ENV1 Which of the below environmental considerations is most important to you? Sort in order of importance, from the most important to the least.
• Achieving improvements to local wildlife habitats; 1
• Creating better natural links between existing habitats. 2
• Protecting the most vulnerable existing protected habitats and species; 3
• Conserving the character of rural landscapes; 4

Call for Sites – 'Green Sites'

These include Suitable Alternative Natural Greenspace (SANG), Biodiversity Net Gain and/or Nutrient Neutrality mitigation sites.

We need to know where land could be suitable for:

Suitable Alternative Natural Greenspace (SANG) – this is the name given to the green space that is of a quality and type suitable to be used as mitigation in the context of the Wealden Heaths Phase II Special Protection Area (SPA). The land should be within close proximity to the Wealden Heaths Phase II SPA.

Biodiversity Net Gain (BNG) –Sites for BNG offsetting should have the potential to buffer or expand existing habitats. For example, connecting woodland blocks, buffering ancient woodland and species rich grassland creation.

There is no minimum or maximum site area.

Exceptions are private gardens or sites already designated for wildlife value i.e. SSSI, Local Wildlife Site

Nutrient Neutrality – Nutrient neutrality is a means of ensuring that a development plan or project does not add to existing nutrient burdens within catchments, so there is no net increase in nutrients as a result of the plan or project. Suitable mitigation measures might include constructed wetlands, changes in land management or retrofitting Sustainable Urban Drainage systems within the catchment of the impacted site(s).

Please do not use this call for sites to suggest or resubmit site suggestions for housing.

CFS2 Please describe where the land is and provide an address if possible (e.g. street name, local area, what landmarks are nearby)

PeCAN is concerned about the purpose of listing a number of sites as potential SANG, BNG and NN mitigation sites, especially in consideration of EHDCs stated aim that offsetting should be a last resort. The purpose of this exercise would appear to be future offsetting. Developers must be required to prioritise - and show that they have prioritised - onsite avoidance and mitigation of biodiversity loss, as well as 10% BNG, and provision of climate change adaptation, for example by incorporating Sustainable Urban Drainage systems (SUDs), green roofs and other rainfall and carbon storage measures. Use of the borrowed local landscape for these purposes, if appropriate, must be decided locally.

The 'nutrient neutrality' proposal, paid for by water companies and developers, which entails creating wetlands and field margin buffer zones in order to soak up farm-based runoff and/or treated effluent discharges, might have the potential, over a long period, of mitigating some biodiversity losses in the wider countryside, but should not be seen as an alternative to changing farming, developer and water company practices. Nutrient overloading must be tackled at source, which will include intensive farming being replaced by extensive farming, on-farm (and on-estate) compost systems, biogas systems and other measures that prevent excess nutrients entering the natural environment. A

requirement for prevention of nutrient escapes to the environment could be part of the planning tool for EHDC.

Related to this is the question of preserving Local Natural Capital. We propose supplementing the hierarchy of "acceptor sites" above with a regionally agreed map of areas whose prime purpose is to provide ecosystem services (these are not necessarily designated areas, but natural/semi-natural/farmed and/or public areas) and for these areas, plus a buffer zone, to be recognised as 'off limits' for development. In this scenario, East Hampshire's Natural Capital areas would not be used to offset development, nor used as nutrient "dumps", but instead recognised as mitigation assets in their own right, serving the higher purpose of ameliorating climate change and helping to reduce biodiversity loss, locally and regionally.

Defra has recently launched its "Enabling a Natural Capital Approach" (ENCA), an online resource that helps landowners, farm clusters and local authorities map their Local Natural Capital:

https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca

CFS2a Please upload any maps or photos of the land you are suggesting to our digital engagement platform.

Infrastructure consultation question
INF1 What type of infrastructure is most important to you? (Sort in order of importance)
Transport / Health / Schools, colleges / Community facilities / Sport / Green spaces / Energy supplies and water / Internet and mobile phone reception.

Infrastructure consultation question
INF2 How do you feel about the allocation of CIL funds to date? (Very happy / Happy / Neutral / Unhappy / Very unhappy).

Infrastructure consultation question
INF3 Which of these do you think provides the best outcome for infrastructure provision? (Select one option)
Many small sites dispersed across the district / Medium sized sites / Large sites / A mix of these
INF3a Please explain your answer.

Please note the answer refers to INF2. The 12 factors that EHDC considers when determining whether schemes should be funded by CIL do not mention climate change mitigation or adaptation and make only a vague reference to environmental needs in factor 5. We would like to see the factors updated so that infrastructure spending gives a high priority to decarbonisation, climate change adaptation, or protecting and restoring nature. This would make it easier for CIL money to support community energy generation, retrofitting of public buildings, and restoration of land, among other things. The list of factors should expressly reference EHDC's Climate and Environment Strategy and ensure that all CIL-funded projects do not harm the climate or environment.

Development Strategy consultation question
DEV1 Please rank these options in order of preference
- Option 1: Disperse new development to a wider range of settlements
- Option 2: Concentrate new development in the largest settlements
- Option 3: Distribute new development by population
- Option 4: Concentrate development in a new settlement

DEV2 Why have you ranked the options in this way? (Please give reasons for your chosen ranking)

Development Strategy consultation question
DEV3 Are there any alternative options we should consider? (Y/N)
DEV3a If yes, please explain.

Two additional options could be considered:

20-minute neighbourhood option - Developments that result in new 20-minute neighbourhoods would help to prevent the growth of transport emissions. 20-minute neighbourhoods could be built from new or created by adding amenities and infrastructure to existing settlements, alongside new housing.

Brownfield option - To the extent that some of the housing need could be met from brownfield site development and change of use of existing buildings, that could be an option that reduces financial and environmental costs and reduces the number of homes that need to be built on greenfield sites. This might include more focus on higher density developments, such as apartment blocks near to town centres and office conversions, which would reduce the land and environmental footprint of development and could be more suitable for district heating and other shared facilities. That might also help to cater for the expected demographic changes in the district.

General consultation question
GEN1 How do you feel about this consultation? (Very happy / Happy / Neutral / Unhappy / Very unhappy).
GEN2 Is there anything else you would like to tell us in response to this consultation? (please explain).

1. PeCAN greatly appreciates the background information provided with this consultation and the user-friendly, jargon-free way it is presented – thank you!
2. We welcome that the consultation goes above and beyond the NPPF and reflects the importance of tackling the Climate Emergency and the need to improve the quality of the local built and natural environments.
3. The format of question OV1 is unfortunate as it (incorrectly) suggests a trade-off between the climate emergency and other priorities. These are not competing goals: Local Plans are required to take into account population and housing needs and there is no reason why adding a climate priority should weaken those duties or their delivery. If anything, the opposite is the case: not having sustainability policies means that housing and infrastructure projects are more likely to be poorly delivered. The design of the question means that some respondents may give the climate emergency a low priority in order to give a higher priority to housing, for example, but this does mean they think the climate emergency should be a low priority in planning. Perhaps the question would have been better framed as a Yes/No choice for each priority instead of a numerical ranking.
4. In question CLIM1, the words “wherever practicable” should be carefully defined so it describes what can reasonably be done rather than simply what is cheaper for the developer.
5. For question ENV1, the reason for the ranking we give is that protected areas such as SSSI’s, Special Protection Areas and to some extent Local Nature reserves and SINCs, do have protection under the law. Whilst it is true these are nevertheless vulnerable, and, shockingly, not in great health (State of Nature report from the National Biodiversity Network in 2019), they are generally heeded in planning for development. What is under enormous threat are the less precious but nonetheless very valuable local habitats that are disregarded. We simply cannot afford to lose more habitat given the dire rate of biodiversity loss. Examples of these are areas of scrub, outgrown hedgerows, tussocky grass and unimproved swards.
6. We welcome the use of nature-based solutions such as street trees and sustainable drainage, as well as green spaces and green roofs, and hope this concept will be well integrated in policies in the emerging Local Plan.
7. The new Local Plan should support the retrofitting of listed and heritage buildings.
8. The Local Plan should be ready to take advantage of the relaxation of mandatory housebuilding targets.

9. We hope brownfield sites can be prioritised as development sites (e.g. WCC draft Local Plan policy D6, Brownfield development).
10. Is it possible to include a presumption against the loss of any open space, sports or recreation facilities?
11. Larger developments could be required to include allotments or garden space to grow food.
12. We hope that planning for non-residential buildings will also have a net zero ambition. We understand that BREEAM is not a tool for driving zero carbon development and so, if used as a planning standard for non-residential development, the Local Plan may need additional policies, such as to stipulate that space heating is powered from renewable energy sources and to encourage low embodied carbon.
13. The Local Plan would be an opportunity to identify suitable sites for solar farms and other renewable energy infrastructure (especially community-owned), including any updates to the 2018 Renewable and Low Carbon Study in light of the expected relaxation of central government policy on onshore wind and other developments since 2018 (https://www.gov.uk/government/news/government-to-launch-consultation-on-local-support-on-onshore-wind).
14. To promote adaptation to climate change, policies could promote features that will increase resilience to power cuts, water shortages, extreme weather and other civil emergencies. As context, the commonest risks in the top right of the Hampshire and Isle of Wight LRF Public Risk Matrix 2021 (i.e. high likelihood and high impact) are natural hazards such as flooding, storms, heatwaves, and heavy snow which are likely to become more extreme as climate change progresses. In general, design and material choices that build self-sufficiency, redundancy and diversity of essential services should improve resilience.
15. Adaptation could also be improved through construction design (see WCC draft Local Plan Policy D9, which calls for orientation, vegetation, and materials to be used to reduce overheating).
16. We welcome EHDC's June 2021 Biodiversity and Planning Guidance and look forward to a robust policy on biodiversity in the new Local Plan. Such a policy could ensure that mature trees are almost never removed (i.e. don't limit protection only to ancient, veteran or 'special' trees) as well as encouraging developers to go beyond 10% legal minimum biodiversity net gain (BNG) where possible. The Council could consider a separate policy to drive nature recovery over larger areas, such as a 'green ratio' or by designating East Hampshire's Natural Capital areas (see answer to CFS2 above). It may be useful to cross-reference the biodiversity guidance in other policy areas, such as the Council's management of verges and green infrastructure.
17. Among other things, we hope that a BNG policy in the Local Plan will include the need to avoid biodiversity loss in the first place, to completely avoid impacts on irreplaceable habitats and protected and unprotected wildlife sites such as ancient woodlands, to properly value biodiversity including in neglected areas such as scrub, to avoid downgrading mature habitats by replacing them with new species-poor habitats, and wording to ensure there is no benefit to applicants who try to lower the biodiversity baseline of a site before applying for planning permission.
18. We hope the planning authority will have sufficient access to ecologists and training to effectively monitor and enforce BNG commitments and to bridge any gaps in the measurement tools that are emerging (for example, Natural England's Biodiversity Metric 3.1 reportedly has gaps in relation to scrub and rewilded land, while version 3.0 had gaps in relation to former mineral sites).
19. Petersfield Climate Action Network (PeCAN) is grateful to the volunteers who prepared this response (Greg Ford, Melanie Oxley, Danny Lee, and Gethin Morgan-Owen). The response has been shared for comment with more than 700 local supporters.