

13<sup>th</sup> March 2025

Planning Policy Team,  
South Downs National Park Authority  
**By email to:** [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk)

Dear Planning Policy Team,

## **Response to Consultation on the Draft SDNP Local Plan Regulation 18 Document Review**

Rowlands Castle Parish Council (RCPC) has reviewed the Draft Revised South Downs National Park Local Plan ('the Draft Revised Local Plan') and is broadly content with the proposed changes and improvements, particularly the substantial changes to SD25 (Development Strategy) in closing the loophole with respect to the inappropriate development of former stables in location detached from settlements.

Sadly, there is too much 'creep' in respect of buildings in the countryside, away from settlements, being changed from agricultural or equine use to dwellings and thus adversely impacting the special qualities of the South Downs National Park (SDNP). It is important to make this Policy robust in the face of attempted development and any appeals that might follow.

However, RCPC's biggest concern is that, while most proposals identified in the Draft Revised Local Plan are welcome (e.g. robust policies on nature recovery, climate change and sustainable use of resources), these are overshadowed by the limited growth proposed in settlements wholly within the SDNP, notably those within our local District of East Hampshire. RCPC feels that the limited amount of development proposed will not meet the housing needs of the District as a whole. SDNP is a largely unaffordable area to live in and unduly limiting housing provision within the Park will further reduce the amount of affordable housing on offer, potentially forcing people to move out of the District. The Park will then become a more elitist area to live in rather than a place where those on modest incomes can still find a home, particularly if they work within the Park in agriculture, forestry and hospitality for tourists. Also, there is likely to be increased traffic into and out of the Park if those who need to work there have to live outside and commute in on a daily basis; this will neither be good for the Park in terms of busier roads nor for attempts to deal with climate change as increased vehicle miles will have a negative impact.

Limiting growth for settlements entirely within the SDNP is likely to have adverse effects on those existing centres. Without a decent size of population with a range of ages, skill sets and ability to contribute to the economic and social life of these settlements the latter will stagnate and even deteriorate in terms of viability. Stagnating growth in these towns and villages increases the likelihood of limited remaining facilities and services from functioning properly. In larger settlements in the District, such as Petersfield, Liphook and Liss, limited growth is having and will continue to have potential negative implications for the vitality and viability of centres.

New national policy and guidance was published in December 2024, along with changes to the standard method for calculating local housing need. The new method increases the district-wide requirement for East Hampshire from 575 homes per year to 1,142 homes per year. A total of 57% of East Hampshire is within SDNP and a total of 26% of all housing stock. RCPC

acknowledges the main purpose of a national park is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, however, there is also a duty to seek to foster the economic and social well-being of the local communities within the National Park. As drafted the Local Plan Review does not have regard to the new housing numbers and the Government's emerging growth agenda.

The existing SDNP Local Plan proposed 4,500 homes be built over the plan period (2024-2042), being equivalent to roughly 250 homes per year across the entire Park. It is noted that, despite being one of the most populated parts of SDNP, with a number of key settlements, including the market town of Petersfield, only about 1,545 homes across the period (some 85 homes per year) were proposed within East Hampshire. This falls below the previous Local Plan provisions of approximately 100 homes per year. It also falls below the identified need in East Hampshire that was established by the South Downs HEDNA (2023) and significantly below the new standard method need of 1,142 homes per year within East Hampshire (District-wide). As a result, land within parishes such as ours, which are only partly within or outside of SDNP, will be packed with dwellings on open spaces outside the Park that are also attractive and valued by the local community.

In Rowlands Castle Parish, which is 60% within SDNP, we face having to take even more dwellings on the remaining 40% outside of the Park under the NPPF 'Duty to Co-operate' requirement from neighbouring districts (Havant and Portsmouth in particular) that cannot find sufficient sites to meet their own needs. The minimum indicative housing requirement for housing in the area of our Parish outside SDNP for the plan period 2024-2042 is 526, and EHDC advises us it is likely that significantly more than that number will be allocated in the emerging EHDC Local Plan, possibly over 1400 dwellings! At present there are about 1,700 dwellings planned in our Parish. This is very disproportionate and unbalanced and will end with every bit of land outside SDNP that is not protected (i.e. ancient woodland, local green spaces, gaps between settlements as defined in our Neighbourhood Plan) being filled with dwellings. This would conflict with the vision expressed in the Rowlands Castle Neighbourhood Plan which is: "To conserve and enhance the Parish of Rowlands Castle as an attractive community, whilst maintaining its separate identity, character and distinctiveness.

RCPC notes that there is only one reference in the Draft Revised Local Plan to the use of brownfield sites as follows:

**POLICY SD34: Sustaining the Local Economy**

*Development proposals that foster the economic and social well-being of local communities within the National Park will be permitted provided that they meet one or more of the following: ... f) Intensify the commercial use of an employment site and make a more efficient use of brownfield land;*

Many settlements within SDNP have elements of brownfield/previously developed land, both within and immediately around their boundaries, that could be used for housing as well as employment sites.

RCPC is concerned that, unless there is a significant increase in dwellings built in the Park during the period 2024-42, the low number of homes currently proposed is likely to have consequences on the Local Plan Review's aim and objectives to conserve and enhance the villages and market towns situated within SDNP, thus compromising the economic well-being of the Park. Whilst supporting the proposed allocations identified in the Local Plan Review, RCPC considers that further sites should be identified, especially in or immediately adjacent to key settlements that are wholly within SDNP with numerous facilities and services and with public transport links. Overall, it is considered that further sites should be identified to address housing needs, particularly affordable housing needs and to keep key facilities and services in settlements functioning.

It is requested that the SDNPA acknowledge the huge imbalance of housing to be provided between the small numbers proposed for inside SDNP and the huge numbers to be built outside and make a greater effort to increase housing provision within villages and towns wholly within SDNP, as a means of easing the pressures on areas outside the SDNP boundary that themselves have areas of countryside valued by the residents. Otherwise, the SDNP will increasingly be seen as an elitist area determined to resist most development rather than accepting there are settlements within SDNP's boundary that could benefit from a reasonable level of development, which will ease the huge pressure on available land outside the Park's boundaries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Walker', written in a cursive style.

Lisa Walker  
Clerk to the Council