



HOUSE OF COMMONS

LONDON SW1A 0AA

Rt Hon Matthew Pennycook MP
Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

10th March 2026

Dear Minister,

National Planning Policy Framework Consultation

I am writing in relation to the consultation on the proposed approach to revising the 'National Planning Policy Framework' (NPPF).

My constituency falls mostly in East Hampshire District Council Local Planning Authority but also within part of Basingstoke and Deane Borough Council Local Planning Authority.

I support the principle of ensuring home ownership is within reach for more families. I also recognise the need for diversity in housing tenures. Any policy needs to ensure there is an adequate and appropriate mix of housing supply for people who grow up in the area so that East Hampshire has vibrant communities that benefit from the necessary age mix. Central to delivering vibrant communities are town and village centres, shops, pubs, schools and other key facilities and infrastructure. Pace of development is also important, to respect, and maintain or enhance the character of an area.

Q192 – Do you agree with the transitional arrangements approach to decision-making?

I am concerned that overall housing targets have increased to such an extent and so quickly that no Local Planning Authority could be reasonably expected to have had a five-year-plan to meet a housing uplift of 39% (Basingstoke and Deane) or 95% (East Hampshire), thus leaving local planning areas adjusting to changes outlined in this revised framework at the same time as progressing their emerging local plans.

By putting in place transitional arrangements where greater weight is applied to this revised NPPF, a significant concern has been expressed to me that local plans that are adopted post the adoption of this revised framework, will

immediately be superseded by decision making policies in the new framework. This would create confusion amongst constituents and considerable frustration within the Local Planning Authority.

Q83 - Do you agree with the proposed changes to the Housing Delivery Test rule book?

As I have previously set out, there is a unique issue we face in my constituency of East Hampshire regarding the treatment of National Parks in calculating housing requirement. In East Hampshire, 57% of the district by land area falls within the South Downs National Park (SDNP), which means East Hampshire District Council is only the Local Planning Authority for the 43% of the district which falls outside the SDNP.

The new edition of the NPPF would be a good moment to set out that housing targets for Local Planning Authorities that include a National Park boundary should be set separately for the parts inside and outside the National Park.

Q122 - Do you agree with the minimum density requirements set out within policy L3?

Policy L3 introduces new minimum density requirements for residential development near train stations. In principle, it makes sense to build homes that are within walking distance of train stations. However, such a blanket approach could result in perverse consequences for rural areas with wholly inappropriate housing densities significantly impacting rural character and placing considerable pressure on local infrastructure.

A policy aimed at unlocking major urban regeneration has very different consequences in rural districts, with stations in small villages or constrained market towns.

Whilst it is possible to make some assumptions, at present it is not clear exactly which settlements would be subject to a 40 dwellings per hectare (dph) requirement or even 50 dph, or the radius of 'reasonable walking distance' (presumably 800m). Does 'Top 60 Travel to Work Areas' (TTWA) mean anywhere in those areas as set out in the map on gov.uk (which would include some small settlements with stations quite far from the principal towns in those TTWAs)? There are questions too, about whether National Landscape protections trump the 800m radius (presumably yes), how the train frequency criterion is to be measured (actual or potential) and whether terminus stations are treated differently. There is also a basic question, in some cases, of how to define a station being 'in' a settlement or not.



But, the fundamental point is that any policy on density around stations must respect the fact that different places with stations have very different characters. It would be quite wrong to assign to a small rural village a target housing density of 40 dwellings per hectare just because it has a rail station.

Q32 - Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?

I welcome the inclusion of a new 'intentional unauthorised development' policy¹ but further detail is needed on what would indicate intentionality. Beyond 'substantial weight' it should be made clear that wilfully ignoring planning consent requirements will not result in retrospective planning permissions being granted, and that this cannot in normal circumstances be countered by 'personal circumstance' arguments.

Any proposed policy should ensure that where unauthorised development is intentional, there is clarity for Local Authorities on proceeding expediently. I have also written to your ministerial colleague, Baroness Taylor of Stevenage on this matter, proposing that a task force determine what can be done in the following areas:

- Restrictions on the delivery of construction materials and mobile housing units to unlawful development sites.
- Fast-tracking court processes for local authorities to serve and enforce injunctions.

Q162 - Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

I wish to register my concern that policy HC6² could result in the unintended consequence of making it easier for developers to convert pubs into houses, shops or takeaways (or demolish them altogether) without engaging the voice of local communities.

Instead of providing extra protections to 'the last pub in an area', I fear this change would end up removing protections for thousands of pubs as Local Planning Authorities would be able to grant planning applications for all but the last pub in an area. Different pubs in an area, perhaps just the only two pubs in a village, can serve very different customer needs and communities.

¹ [National Planning Policy Framework: draft text for consultation](#) p21 Policy DM8

² [National Planning Policy Framework: draft text for consultation](#) p75

Indeed, in a number of planning appeals, I am aware that Inspectors have given weight to such differences in turning them down.

Please also take this letter as a submission to the consultation.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D. Hinds'.

Damian Hinds
Member of Parliament for East Hampshire

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