

Report to	Planning Committee
Date	14 May 2026
By	Director of Placemaking
Title of Report	Update on Effective Cooperation on the Local Plan
Purpose of Report	To inform members about the cooperation activities undertaken

Note

Recommendation: The Committee is recommended to

1. Note the contents of this report

Executive Summary

This report relates to work undertaken to cooperate with other planning authorities and statutory bodies on plan-making, and its purpose is to update Members on the discussions and formal responses made by officers under delegated powers. A similar report was provided to Planning Committee on 11 December 2025. This report updates Planning Committee on cooperation activities between December 2025 and April 2026.

The report covers:

1. Background
2. Strategic Cross-Boundary Themes
3. Meetings and Correspondence with Partners
4. Correspondence From SDNPA to Other Local Authorities on South Downs National Park Potential Unmet Needs
5. Statements of Common Ground
6. Next Steps

1. Background

- 1.1 Under the legislation in place until March 2026 local planning authorities had a legal 'duty to cooperate' with each other and other statutory bodies in the preparation of their Local Plans. However, this legal duty was removed with effect from 25 March 2026. When the Minister, Matthew Pennycook MP, announced this change last November he said, "Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the National Planning Policy

Framework (NPPF) on ‘maintaining effective cooperation’’. In essence, the tests of cooperation have just moved from the initial ‘legal requirements’ section to the main part of the examination into the ‘soundness’ of the Local Plan. Importantly, that means that any concerns that the Inspector has about effective cooperation are capable of being resolved during the examination, whereas previously such concerns would have stopped the examination at the first stage as the legal tests must be met prior to submission.

- 1.2 In November 2024 Planning Committee approved the Project Initiation Document for the new South Downs Local Plan, which included as an appendix the ‘Cooperation and Alignment Strategy’, available at [Appendix C - South Downs Local Plan Review - Cooperation and Alignment Strategy](#) . This sets out how the Authority intends to maintain effective cooperation with relevant organisations.

2. Strategic Cross-boundary Themes

- 2.1 The Cooperation and Alignment Strategy identifies the following strategic priorities and themes which guide our discussions with neighbouring local authorities and other organisations. These are:

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park and its setting;
- Biodiversity restoration at all scales and making nature bigger, better and more joined up;
- Protection and mitigation of impacts on European designated nature sites including water and nutrient neutrality;
- Mitigation and adaptation to climate change, including nature based solutions;
- Sustainable travel into, within and across the National Park;
- The local economy and jobs particularly in land management and the visitor economy;
- New homes including accommodation for Travellers, focusing on affordable homes for local communities; and
- Green and grey infrastructure serving communities in and around the National Park.

3. Meetings and Correspondence with Duty to Cooperate Partners

- 3.1 The following meetings and responses have been undertaken by officers since December 2025:

Organisations	Date	Outcomes
South East Coast Group	04/12/25	A dedicated meeting will be arranged in the new year to progress the Shoreline Management Plan refresh for section 12 Beachy Head to Selsey Bill.

East Sussex Planning for Health Working Group	08/12/25	Input into Health Impact Assessment (HIA) Toolkit; review of HIA thresholds / triggers and update on use of Health, Wellbeing and Sustainability Framework
Hampshire Development Plans Group	12/12/25	Sharing experiences of consultation software; updates on national planning reform and updates on Local Plans
Winchester City Council – Response to Inspector’s Note re cooperation with other local planning authorities on housing numbers	09/01/26	Update on SDLP Reg 19 housing figures
Habitats Regulations Assessment Cross Boundary Meeting with East Hampshire, Waverley Borough Council and Natural England	12/01/26	Updates on latest status of our plans and Footprint ecology Strategic Access Management and Monitoring study for the Wealden Heaths Complex of designated sites, and agreed that SDNPA would organise a dedicated meeting on this in due course.
Winchester City Council – Response to main modifications consultation	13/01/26	Update on SDLP Reg 19 housing figures
Eastleigh Borough Council	16/01/26	Discussed SDNPA Unmet Needs letter and LP and Eastleigh’s emerging LP
Partnership for South Hampshire – Natural Environment Group	28/01/26	Regular meeting to discuss Nutrient Neutrality and Bird Aware.

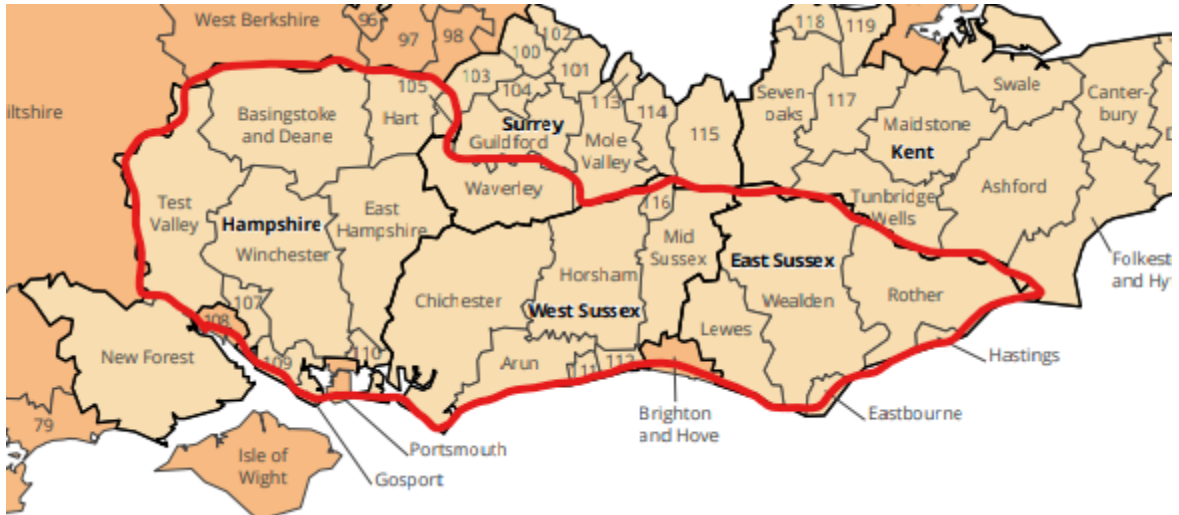
East Hampshire District Council	04/02/26	Discussed SDNPA Unmet Needs Letter and LP and EHDC's emerging LP
Hampshire Planning Research & Liaison Group	05/02/26	Sharing knowledge on monitoring of policies and planning data to inform Local Plan implementation and preparation; updates on Local Plan progress.
Brighton & Hove City Council Public Health Team	18/02/2026	Introduction to Local Insight for use in the South Downs Health and Wellbeing Topic Paper.
Lewes District Council	19/02/26	Discussed the economic and retails needs assessments and ensuring that LDC's update does not conflict with SDNPA work.
Wealden District Council	04/03/26	Discussion about respective Local Plans.
West Sussex Health Impact Assessment (HIA) Study Day	06/03/2026	A study day between WSCC, SDNPA and district and borough councils to develop and build capabilities for HIA implementation policies across West Sussex for public health and planning professionals.
Response to Wealden DC Unmet Needs Letter	16/03/26	Confirmed that SDNPA is unable to assist with WDC's unmet needs.

Response to Wealden Regulation 18 consultation	25/03/26	General advice on the setting of the SDNP, and specific comments on development option for 2,000 homes on Land West of Arlington & Hailsham.
Eastbourne Borough Council	01/04/26	Discussion about Eastbourne LP Reg 18
Eastbourne Local Plan Regulation 18 consultation response	02/04/26	Suggested minor amendments to criteria for sites in the setting of SDNP.
South Downs Local Access Forum	10/04/2026	Update on local plan timeline and anticipated Reg19 consultation.
Refresh of the Shoreline Management Plan 12 Beachy Head to Selsey Bill – relevant Local Authorities, South Downs National Park Authority and Environment Agency	17/04/26	Discussed the scope of the review and agreed governance details will be circulated for review, the project lead will arrange to meet with LPAs to discuss, and a second meeting of the group will take place in summer 2026.
Gosport Borough Council	21/04/2026	Discussion about emerging local plans and Statement of Common Ground

3.2 There have also been regular meetings with promoters of site allocations included within the Proposed Submission Local Plan. This includes with the following public landowners: Lewes District Council; East Sussex County Council; East Hampshire District Council; Hampshire County Council; Chichester District Council; and Horsham District Council. The intention is to include a paragraph about the deliverability of these sites within the Statements of Common Ground agreed with these local authorities.

4. Correspondence From SDNPA to Other Local Authorities On South Downs National Park Potential Unmet Needs

4.1 On 19 November letters were sent to all 12 constituent local authorities (those with land within the National Park) and 14 neighbouring local authorities (all within the red line on the map below).



4.2 Examples of these letters were included in Appendix I of the report to Planning Committee on 11 December 2025. In summary they advised the following:

- That two new studies had been published on the housing needs of the South Downs National Park. These are the AECOM report, which concludes that the National Park has a housing need of 1,048 homes per year; and the Icenii Addendum report, which concludes that it has a housing need of 323 homes per year.
- That the SDNPA considered that 323 homes per year is the correct housing need figure and would be using this in the Regulation 19 Local Plan.
- That, in the event that the Planning Inspectorate disagreed, and considered that the 1,048 homes per year is the most appropriate figure, the SDNPA would not be able to meet this need, and requests that the other local authorities accommodate the unmet need (approximately 700 homes per year) within their local planning authority areas.
- That letter also identified that SDNPA was unlikely to be able to meet the needs for gypsy and traveller pitches or travelling showpeople plots. The letter asked the other local authorities to accommodate this unmet need within their local planning authority areas.

4.3 The above correspondence is a necessary step when a local planning authority anticipates that it may not be able to meet development needs within its own plan area. The table below shows where we have received responses to this letter, and the responses received are attached in Appendix I. These responses are generally indicative of the significant pressure other authorities are under due to the high housing need figures in the South East under the Government’s standard methodology and the constraints to meeting these, including tight boundaries around urban areas, flood risk and other designations including National Landscapes. As a result the correspondence has not resulted in a solution to any unmet needs arising from the National Park.

Local Planning Authority	Date of Response	Summary
Arun District Council	09/01/2026	Unlikely to be able to meet own needs so unable to assist
Basingstoke Borough Council	9.12.2025	BDDBC does not have any scope to accommodate any unmet housing or gypsy and traveller need from the SDNP.
Brighton & Hove City Council	15.12.2025 and 15.01.2026	BHCC not currently aware of any potential gypsy and traveller sites within its area and is unable to offer assistance in meeting housing needs in the SDNP as it is unable to meet its own needs.
Chichester District Council	12/02/2026	Unable to assist with housing need due to uncertainty over methodology and queried evidence base on supply of gypsy and traveller sites.
Hart District Council	19/11/2025	Not in a position to agree to meet any unmet housing needs or unmet needs for gypsies and travellers due to early stage of Local Plan.
Havant Borough Council		As HBC cannot meet its own needs, it cannot help SDNPA with its unmet housing need or gypsy and traveller need.
Horsham District Council	23/12/2025	Unable to meet own needs so unable to assist
East Hampshire District Council	08/01/2026	Seeking a more refined, spatially specific analysis of unmet need before determining the extent to which it may reasonably assist. Should a surplus of housing capacity be identified as part of a suitable development strategy, it is envisaged that unmet needs from the SDNP in East Hampshire, where geographically related, would be prioritised.
Eastleigh Borough Council	02/02/2026	No scope to accommodate the unmet needs and query relation to Housing Market Area.
Rother District Council	23/01/2026	Unable to meet own needs so unable to assist

Test Valley District Council	19/12/2025	Will be a challenge to meet their own needs so unable to assist
Winchester City Council	11/12/2025	Given early stage of WCC Local Plan Review, it would be premature to make any firm commitments regarding the accommodation of unmet housing need at this time.

5. Statements of Common Ground

5.1 Paragraph 28 of the NPPF says that “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these”. The following Statements of Common Ground have been signed by the Director of Placemaking on behalf of the SDNPA since December 2025.

Organisation	Date Statement Signed	Summary of Contents
Portsmouth City Council	18.02.2026 & 19.02.2026	Respective positions on housing, employment and gypsy & traveller needs and supply, and agreement that neither authority are able to assist with any unmet needs.
Havant Brough Council	24.03.2026 & 01.04.2026	Respective positions on housing, employment and gypsy & traveller needs and supply, and agreement that neither authority are able to assist with any unmet needs.

5.2 On 16 April draft Statements of Common Ground were sent to all of the other local authorities identified in paragraph 4.1. The intention is for these to be signed by the end of the Regulation 19 consultation on the Proposed Submission Local Plan (23 June).

6. Next Steps

6.1 Officers will continue to work cooperatively with colleagues from neighbouring and nearby local authorities to coordinate Local Plans to address strategic cross-boundary matters. This will include formal correspondence and Statements of Common Ground. We will also work with other statutory bodies, such as Natural England and the Environment Agency, to resolve any issues raised with respect to the Local Plan or its evidence base, and agree Statements of Common Ground over the next six months. A further update on cooperation activities and outcomes will be provided to Planning Committee on 8th October prior to the submission of the Local Plan in November.

7. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	Yes, update reports will come to Planning Committee every six months prior to the submission of the Local Plan for examination.
Does the proposal raise any Resource implications?	As agreed through the budgeting process.
How does the proposal represent Value for Money?	Cooperation with other authorities and organisations is a national policy requirement in preparing Local Plans.
Does the proposal seek to further National Park Purposes as required under Section 11A(2) duty of the National Parks and Access to the Countryside Act 1949 as amended by Section 245 of the Levelling Up and Regeneration Act 2023?	Yes joint working with partners is key to furthering National Park purposes.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	The Local Plan Review seeks to deliver against all PMP Aims but Aim 7 and related objectives and delivery principles are particularly relevant.
Links to other projects or partner organisations	The report documents engagement with partners.
How does this decision contribute to the Authority's climate change objectives	Mitigation and adaptation to climate change is one of the strategic matters identified in the report.
Are there any Social Value implications arising from the proposal?	None, report just for noting.
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	None, report just for noting.
Are there any Human Rights implications arising from the proposal?	None, report just for noting.
Are there any Crime & Disorder implications arising from the proposal?	None, report just for noting.
Are there any Health & Safety	None, report just for noting

Implication	Yes*/No
implications arising from the proposal?	
Are there any Data Protection implications?	None, report just for noting.

8. Risks Associated with the Proposed Decision

8.1 This report is just for noting and is not requesting Planning Committee to make a decision. However, it is provided in the context of the risk identified below.

Risk	Likelihood	Impact	Mitigation
Failure to demonstrate effective cooperation in the preparation of the new Local Plan.	Medium	Medium	Proactive working with partners to identify and seek to address strategic cross-boundary issues as set out in the approved Cooperation and Alignment Strategy.

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 Appendix: I. Responses received to Unmet Needs Letters
 SDNPA Consultees: Director of Placemaking; Monitoring Officer; Legal Services
 External Consultees: None
 Background Documents: None