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Attention: Claire Tester

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09/01/26

Please ask for: Ian Moody  
Planning Policy Team  
Directorate of Place  
Direct Line: (01903) 737824

Dear Claire,

### **Housing Need in the South Downs National Park**

Thank you for your letter dated 19<sup>th</sup> November 2025 and for sharing the links to your recently published studies on housing need.

The work progressed by AECOM provides clear and logical evidence of housing need for the South Downs National Park (SDNP) area (1,048 homes per year). The work then progressed by Icen identifies a housing need figure which is based on the landscape capacity of the National Park to accommodate development. This assessment was also informed the principles agreed by the ten English National Parks and the Broads.

Due to the unique local characteristics and the statutory purposes for the National Park it is accepted that there is no realistic opportunity for the SDNP area to meet the AECOM housing need figure in full. Given that housing needs won't be met in full, the Park Authority will need to demonstrate that all sites deemed to be suitable, achievable and available have been allocated for development. The soon to be published updated Land Availability Assessment to support the Regulation 19 version of your Local Plan will provide key evidence to support this position.

Ultimately, the proposed housing figure (323 homes per year) that you expect will be embedded in your emerging Local Plan will be considered by an Independent Inspector and 'tested' at your forthcoming Examination. At this stage, given that the level of 'shortfall' is still to be finalised, and in advance of all supporting evidence being published, Arun DC reserve judgement as to whether the housing figure being put forward for the SDNP area is appropriate. However, despite this, Arun DC accept that the SDNP Local Plan will not be able to meet its identified housing need in full, so we acknowledge and understand why the SDNPA has written to formally request that Arun accommodates a proportion of the unmet housing needs from the SDNP area.

In this regard, and as you will be aware, delivering the very high levels of growth currently required in Arun will be extremely challenging. Informed by the Housing Delivery Test (including 20% buffer) the net number of new homes required to be delivered over the next 5-year period within Arun now stands at 1,771 per annum. This is one of the highest requirements of any non-metropolitan district or borough in the country. Despite a very high level of growth incorporated within the current Arun Local Plan (1,000 dwelling per year) and a record level of housing delivery in the district in 2024/25

(1,265 dwellings) Arun DC is still only able to demonstrate a Housing Land Supply position of 3.23 years. This is despite the council taking a positive approach to sustainable growth in recent years as evidenced by the very high number of unimplemented commitments (6,780 dwellings).

As you will be fully aware, the repeated delays to the publication of planning reforms and related guidance and legislation for Plan-making has made it very difficult for Plans to be progressed under the 'new' system. The backdrop of Local Government Reorganisation and devolution provides a further complication that will inform and influence the future of Local Plan preparation in Arun and the wider sub-region.

Despite these challenges, a significant amount of evidence has been progressed in Arun over the last year to provide the 'building blocks' for future Local Plan preparation. Whilst the evidence to inform Plan preparation is still being advanced, it is considered very unlikely that Arun district will have the capacity to sustainably accommodate the required levels of need for the district in full. As such, whilst this is still to be tested, in my view there will be very little (or no) prospect of Arun being able to accommodate any additional need arising from housing delivery shortfalls from the SDNP area.

### Gypsy and Traveller Accommodation

Arun Local Plan policy H SP5 includes a commitment to produce a Gypsies & Traveller and Travelling Showpeople (GTTS) site allocations document. To support this the Joint GTTS Accommodation Needs Assessment 2019 (GTAA) identified a need of 9 Gypsy & Traveller pitches and 14 Travelling Showpeople plots in Arun. To address this, a Gypsies & Traveller Development Plan Document (G&T DPD) was prepared and consulted on between December 2023 and February 2024. However, at the same time, the government changed the definition of Gypsies & Traveller Households, which placed the G&T DPD at significant risk of being found unsound. It was therefore withdrawn. Arun has begun very early work on identifying its GTTS need as part of building blocks for a new local plan and this will be progressed further in the coming months.

It is noteworthy that following a recent appeal (Ref: 3371932) the inspector confirmed that Arun is failing to meet its own need for GTTS.

Therefore, without an up-to-date and robust evidence base and the existing unmet need as identified in case law, it is considered that Arun is currently unable to commit to making a contribution in providing for the SDNP unmet need for Gypsies & Traveller and Travelling Showpeople accommodation.

I note that you intend to contact us with regards to preparing a Statement of Common Ground. We will be happy to work with you on this document and on any other ways that we can assist as you prepare your Local Plan for submission later this year. In the meantime, please don't hesitate to contact me if you would like to discuss any points raised in this letter.

Yours sincerely,

Ian Moody (Planning Policy and Conservation Team Leader)

**Arun District Council**



Basingstoke and Deane Borough Council

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Emailed to Claire Tester

[Claire.Tester@southdowns.gov.uk](mailto:Claire.Tester@southdowns.gov.uk)

South Downs National Park

9 December 2025

Dear Claire

**Duty to Co-operate Formal Requests**

Thank you for your letter of 19 November regarding Duty to Co-operate matters. This set out a formal request that Basingstoke and Deane Borough Council accommodates both the unmet housing needs of the South Downs National Park (in the event that the Planning Inspectorate prefers the AECOM method for calculating housing need) and the unmet gypsy and traveller needs of the National Park within our local planning authority area. You have outlined that, using the Aecom methodology, the overall unmet need is likely to be approximately 700 homes per year. The required pitch provision to meet the Gypsy and Traveller and Travelling Showpeople Accommodation is not defined.

Your letter is helpful in setting out the current position for the South Downs National Park. However, it is unclear what proportion of the outlined need you are specifically requesting the borough to accommodate, especially given that this request is likely to be sent to other authorities in the area. The South Downs is some distance from the borough and is not a neighbouring authority. The suitability of your site assessment work and the consideration of which housing need approach is more suitable for the area will be fully considered through your Local Plan process and therefore the council will not be commenting on this further at this stage.

The council is in the early stages of updating the adopted Basingstoke and Deane Local Plan (2011-2029). A second Regulation 18 consultation is currently taking place, focusing on a revised spatial strategy which accommodates the needs of the current NPPF in full, including the significant uplift in housing requirement to 1,152 home per annum. It includes a stepped approach due to concerns about the ability of local infrastructure to cope with the proposed high levels of growth (effectively allowing some infrastructure to catch up) and also due to the nature of the spatial strategy which, due to the high numbers involved, includes a number of large scale strategic sites/new settlements which will take some time to deliver new homes on the ground. The council continues to have significant concerns about whether such a high level of growth can be sustainably accommodated in the borough.

Chief Executive Russell O'Keefe  
Deputy Chief Executive Rebecca EmmettDirector of Resident Services Fiona Darby  
Director of Regeneration Sarah Longthorpe  
Director of Customers, Digital and Improvement Katy Sallis

It is also worth highlighting that the current high housing number in the borough, coupled with a shortage of deliverable sites, has led to the council being unable to demonstrate a full five-year housing land supply for a number of years. Whilst the council is taking proactive steps to address this, the position remains around three years. This again demonstrates the difficulty of meeting our own high housing number and therefore the inability to accommodate further additional homes from neighbouring areas.

I can therefore confirm that unfortunately the council does not have any scope to accommodate any unmet housing need from the South Downs National Park that would arise from the Aecom methodology. This is considering the current high housing number within this borough and the availability of suitable sites and infrastructure to deliver new homes.

Secondly, in terms of accommodating the unmet need for gypsy and traveller needs, I can again confirm that the council is not in the position to assist given the current level of need within this borough and the availability of suitable sites to accommodate such need.

To inform the Local Plan process we have commissioned consultants ORS to update the Gypsy and Traveller Accommodation Assessment (GTAA). This is currently underway but has not yet been published. Work to date indicates that the need for pitches in the borough has increased significantly since the last GTAA was completed. The borough therefore has a significant need of its own to meet. Based on the currently published GTAA, the council cannot currently show a five-year supply of sites and therefore is already in the position of determining planning applications and facing appeals without a five-year supply. The current strategy of allocating pitch provision on larger greenfield housing sites is being implemented but is taking time to deliver. A call for sites was conducted to inform the Local Plan and this failed to identify any suitable sites for such provision. As such, the council is in a similar position to the South Downs national park in having to identify a suitable strategy through its Local Plan to accommodate high levels of need with very limited opportunities. Given the challenges with meeting our own needs the council is not able to assist the needs of neighbouring areas.

As always, we welcome the ongoing dialogue between councils and are happy to assist in the production of relevant statements of common ground if that would be helpful.

Kind regards

Joanne Brombley  
Planning Policy Manager  
[Joanne.brombley@basingstoke.gov.uk](mailto:Joanne.brombley@basingstoke.gov.uk)  
01256 845410



**Planning Policy, Projects  
and Heritage**

Brighton & Hove City Council  
Hove Town Hall (1<sup>st</sup> Floor)  
Norton Road  
Hove

BY EMAIL

Date: 15 December 2025

e-mail: [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Dear Claire,

**SDNPA Local Plan – request to assist with unmet gypsy and traveller pitch needs**

Thank you for your letter dated 19 November 2025 within which a formal request was made for Brighton & Hove City Council to assist with accommodating unmet gypsy and traveller pitch needs of the National Park.

The most recent calculation of Brighton & Hove's pitch needs is contained in the same document you refer to as this was a joint study between our authorities together with Adur-Worthing. It concludes that Brighton & Hove has a need for 7 additional pitches over the period to 2042.

Gypsy and traveller pitch provision will be an issue considered though our forthcoming new City Plan, known as City Plan 2041. This will be prepared under the new plan-making system. We await new regulations for the revised plan-making system and as such have not formally commenced plan-making.

Our most recent work to identify suitable and available sites for gypsy and traveller pitches was published in 2017 and was also a joint study with the National Park and is available to download here [ED05 Gypsy Traveller Site Search Study 2017.pdf](#). This identified one potential site within the Brighton & Hove planning area at 'north-east of Coldean Lane'. This site was subsequently found to be unavailable as it was to be taken forward through a Joint Venture with a Registered Provider for 100% affordable housing, and indeed has now been developed for that purpose.

As such we are not currently aware of any potential sites within our area. None were put forward during a recent wider 'call for sites' ahead of work starting on our new plan. We will be holding another call for sites in due course and reviewing past G&T pitch site selection work. Should those exercises indicate that we may be able to assist in meeting wider needs, I will of course let you know.

Yours faithfully,

Steve Tremlett  
Planning Policy & Heritage Manager



**Planning Policy, Projects  
and Heritage**

Brighton & Hove City Council  
Hove Town Hall (1<sup>st</sup> Floor)  
Norton Road  
Hove

BY EMAIL

Date: 15 January 2026

e-mail: [planningpolicy@brighton-hove.gov.uk](mailto:planningpolicy@brighton-hove.gov.uk)

Dear Claire,

**SDNPA Local Plan – request to assist with unmet housing needs**

Thank you for your letter dated 19 November 2025 within which a formal request was made for Brighton & Hove City Council to assist with accommodating the unmet housing needs of the National Park in the event that the Planning Inspectorate prefers the AECOM method for calculating the Park's housing need. You state that indications are that you will be able to meet the 'Iceni' housing need figure of 323 homes per year but would not be able to meet the AECOM figure of 1,048 homes per year.

Brighton & Hove is a very constrained local authority. The city is subject to major physical and environmental constraints which severely limit the potential to meet housing needs within our own boundaries. The City Plan Part One (CPP1) adopted in March 2016 set a housing provision target to deliver a minimum of 13,200 net dwellings over the period 2010- 2030 (660 net dwellings per year). However, this figure accounted for only 44% of the city's objectively assessed housing needs which were assessed in 2015 as 30,120 net dwellings (1,506 net dwellings per year). Actual delivery has been lower than the Plan target overall, although recent years have seen greater number coming forward with 1,300 being delivered in the last monitoring year 2024/25.

We are at an early stage of preparing a new City Plan, which will come forward under the new plan-making system. Our standard method housing need figure is now much higher than the OAN in 2015, being approximately 2,500 dwellings per year. For context, this is higher than much larger cities such as Newcastle, Liverpool, Southampton and Manchester. We are still progressing our site identification work which has involved looking positively at all opportunities for bringing forward sites. We have held a call for sites, and have proactively approached owners of the few large, underused sites in the city, such as supermarket car parks and car showrooms. Our emerging work is indicating that we will be able to accommodate approximately one third of the standard method need figure.

Although the new City Plan work is still at a very early stage and we will be hold a further call for sites in due course, we do not consider our position is likely to change significantly in terms of either the high level of housing need facing the city, or the limited capacity for future housing delivery beyond current levels. For these reasons, we are unable to offer assistance in meeting housing needs in the National Park.

Given the large unmet need in Brighton & Hove and unmet needs elsewhere in Sussex, we support your approach of allocating all sites found to be suitable, achievable and available for housing development.

Yours faithfully,

Steve Tremlett  
Planning Policy & Heritage Manager

Claire Tester  
Planning Policy Manager  
South Downs National Park Authority

If calling please ask for:

Our ref:

By email only:  
Claire.Tester@southdowns.gov.uk

Your ref:

12 February 2026

Dear Claire

## HOUSING NEED IN THE SOUTH DOWNS NATIONAL PARK

Thank you for your letter dated 19 November 2025, alerting us to the publication of two studies on housing need and setting out that you are proposing to use the lower figure of 323 homes per year in your Local Plan.

I note that you have updated your Land Availability Assessment and are proposing to allocate all those sites found to be suitable, achievable and available for housing. We have not reviewed the LAA further at this stage.

You have made a formal request that Chichester District Council accommodates the unmet housing needs of the National Park within our local planning authority area, with an overall unmet need figure of approximately 700 homes per year based on the AECOM method. It is not clear from your letter what portion of the overall unmet need figure you would be seeking to be accommodated within the Chichester plan area. This is something that we would require clarity on.

Notwithstanding the above, as you set out in your letter you are intending to progress with a housing need figure (based on the Icen study) of 323 homes per year, and indications are that you will be able to meet that figure, then there would be no unmet housing need. On this basis, there would not be any unmet need. We would not be able to consider unmet need on the basis that you have set out, i.e. in the event that the Planning Inspectorate prefers the AECOM method for calculating housing need. This approach would not provide level of certainty that will be needed. There is also going to be a disconnect if Chichester District Council decide to use the AECOM method as the basis for calculating our need figure outside the SDNP area, as the proportion of need within the SDNP would be lower based on the Icen method.

In terms of the request for Chichester District Council to accommodate the National Park's unmet gypsy and traveller need within its local planning authority area, the council is not in a position to accommodate any of that unmet need. The Local Plan area is much smaller than the SDNP and yet has a much higher need for traveller pitches, more than double the SDNP requirement. Trying to meet that need within the plan area is already extremely challenging. While the council has utilised every supply opportunity available to it, the council is still heavily reliant on windfall in order to meet its needs.

Consequently, there is no unutilised supply available and it would not be appropriate to rely upon windfall to meet the needs of a neighbouring area.

In your letter you make reference to inviting the council to peer review the site assessment work which has been undertaken with a view to meeting that need. This is probably not the place to do that in any detail. However, on the face of it the information currently available on the National Park's website does not reveal the existence of a site capacity exercise having been undertaken with a view to intensifying the use of existing sites, nor is it clear how you have sought to apply traveller pitches to larger housing allocations. It is also not apparent how many windfall pitches could potentially be relied upon. These are all things which you may wish to consider addressing in seeking to more fully meet your needs.

We are of course happy to continue dialogue and are happy to work on a Statement of Common Ground in the future.

Yours sincerely

Tony Whitty  
Divisional Manager  
Planning Policy

Cc:



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Claire Tester, Planning Policy Manager  
 South Downs National Park Authority  
 South Downs Centre  
 North Street  
 Midhurst  
 West Sussex  
 GU29 9DH

## SENT BY EMAIL

08 January 2026

Dear Claire,

### **Re: Formal Response to Request for Assistance with Potential Unmet Housing Needs – Duty to Cooperate**

Thank you for your letter of 19 November 2025 and for sharing the latest evidence on housing needs within the South Downs National Park (SDNP), including the AECOM assessment and the Icenii Addendum. East Hampshire District Council (EHDC) welcomes the continued constructive and collaborative engagement between our authorities, which has long been an essential part of supporting sound and deliverable Local Plans across the wider region.

The letter highlights there may be no unmet housing need associated with the South Downs Local Plan Review (LPR), subject to the methodology endorsed by the Planning Inspectorate when the LPR is examined. However, it is noted, there is a potential unmet housing need of approximately **700 homes per year** if the Icenii Addendum is preferred. Although not explicitly stated, this would equate to a total potential unmet need of **12,600 homes** over the emerging plan period (2024-2042).

It is unclear, but EHDC assume the potential unmet need covers the full extent of the area within the SDNP. It is considered further clarity is needed on the location of potential unmet need, particularly in relation to local authority boundaries and any housing market areas.

### **East Hampshire Context**

EHDC is currently preparing a new Local Plan, with Regulation 19 consultation scheduled for summer 2026. As you are aware, the uplift in housing need resulting from the 2024 standard method has had a substantial impact on our district, which boundaries you share. As acknowledged in the joint AECOM assessment, the district-wide housing need has increased from 575 homes per annum to 1,124 homes per annum, representing a 95% increase. This is one of the highest percentage increases nationally.

The AECOM assessment supports disaggregating housing need based on housing stock. With 26% of East Hampshire’s housing stock falling within the SDNP, the residual housing need for the EHDC Local Planning Authority area is approximately 828 homes per annum, equating to 14,904 homes over our emerging plan period (2025–2043).

### **Consideration of Unmet Needs**

EHDC is committed to positively engaging with neighbouring authorities under the Duty to Cooperate. We recognise the development constraints faced by a National Park designation and the purposes of a National Park. However, we must remind you of our comments to the South Downs Local Plan Review – First Public Consultation (Regulation 18) in early 2025. In particular, the National Park Authority also has a duty when carrying out the purposes:

*“To seek to foster the economic and social well-being of the local communities within the National Park.”*

As mentioned in the previous response, the SDNP differs from other national parks across England. In line with the 2021 Census, it states *“In England, the South Downs was the national park with the most usual residents (113,300) and households (48,600). This was followed by the Lake District (39,000 residents, 17,800 households) and the Peak District (35,900 residents, 16,200 households). The least populated national parks were Northumberland (1,800 residents, 800 households) and the Broads (6,300 residents, 3,100 households)”*.

It should be reiterated that the number of people living in the SDNP far exceeds any other national park and EHDC considers the Local Plan Review needs to better recognise that and the resulting social and economic needs of those people.

Despite the above, EHDC is committed to positively engaging with neighbouring authorities on strategic cross-boundary matters, which includes potential unmet housing needs. As mentioned, we recognise the development constraints facing the SDNP, however, unlike requests from other local planning authorities, it is currently unclear what efforts have been made to identify and quantify unmet needs.

The South Downs National Park extends over 140km and covers a large, geographically diverse area. Any request for assistance must therefore be supported by clear evidence identifying where within the National Park that unmet need is arising, rather than presenting a single aggregate figure that offers no spatial distinction.

It would be inappropriate for EHDC to accommodate unmet housing needs arising from parts of the National Park that have no functional housing market or economic relationship with East Hampshire. National policy, the Duty to Cooperate, and sound plan making principles all require that cross boundary provision is justified by evidence of:

- Housing market area alignment,
- Travel-to-work area linkages,

- Local service and infrastructure relationships, and
- Sustainable patterns of growth.

EHDC is therefore seeking a more refined, spatially specific analysis of unmet need before determining the extent to which it may reasonably assist.

### **Evidence Base**

EHDC is committed to ensuring that the Local Plan is underpinned by a strong and comprehensive evidence base and has a strong record of joint evidence-gathering with the SDNPA. This includes the collaborative work in the AECOM assessment on housing need, housing stock distribution, and cross-boundary affordability. It is important that such cooperation continues to ensure that the unique characteristics of the National Park are accurately reflected in technical studies and in the preparation of both our Local Plans.

#### *Housing Needs*

EHDC supports the findings of the Icení Addendum to the 2023 Housing and Economic Development Needs Assessment (HEDNA), which provides an alternative approach to housing needs based on principles agreed by the 10 English National Parks and the Broads. Notwithstanding the support, EHDC have concerns that the locally determined method does not adhere to the Planning Practice Guidance (PPG) on the matter. However, we recognise that the SDNPA considers its output is the appropriate figure to use for housing needs in the National Park as it reflects the unique demographic characteristics of the area and will use this figure in its LPR.

Despite the above endorsement, there are concerns on the lack of clarity in terms of potential unmet needs should a Planning Inspector advocate the findings in the AECOM assessment. Given the scale and geography of the South Downs, spanning multiple local authorities, counties, housing market areas and functional economic areas, we request further clarity on the location of potential unmet housing need. We understand that your recent request has been issued to 26 authorities in total, which further highlights the complexity of planning for the SDNP at a strategic level and the importance of a coordinated response across administrative boundaries.

#### *Land Availability Assessment (LAA)*

EHDC commends the recent publication of the updated South Downs Land Availability Assessment (LAA), which takes a more pragmatic approach to the consideration of sites. Although not clear from the Draft South Downs Local Plan consultation in early 2025, subsequent information received by the SDNPA in early 2025 suggested provision of 1,022 homes within the East Hampshire part of the national park (outstanding permissions,

outstanding allocations in the adopted SDLP and neighbourhood plans, windfall allowance). The updated South Downs LAA suggests sites totalling 1,234 dwellings in East Hampshire “has potential” for further consideration in the South Downs Local Plan Review. Whilst EHDC appreciates the LAA does not determine whether a site should be allocated for development, there is potential for a considerable amount of provision within the East Hampshire part of the SDNP. When combined with commitments, approximately 2,250 homes could be delivered. This increase in potential housing delivery is welcomed.

As a result of the potential provision, it is important that the total amount of unmet need within that area be determined, should an Inspector favour the AECOM approach to calculating housing needs. The AECOM assessment identifies a housing need of 296 homes per year in East Hampshire’s part of the SDNP, totalling 5,328 homes over the plan period. In comparison, the Icení Addendum identifies a housing need of 91 homes per year in East Hampshire, totalling 1,638 homes over the plan period. Therefore, the potential provision could exceed the number of homes that are needed.

Once further clarification is provided, EHDC will be in a better position, as part of our Local Plan preparation, to give due consideration to the unmet housing of the SDNPA. This will be informed by:

- Our Integrated Impact Assessment (IIA), which will assess reasonable alternatives including considering unmet needs;
- Infrastructure evidence and site assessments currently in progress;
- The identification of housing market areas and functional economic market areas (FEMA), including the limited extent of HMAs associated with East Hampshire.

To date, EHDC has received formal requests from Gosport Borough Council, Havant Borough Council, and Portsmouth City Council to assist with an identified unmet need in excess of 18,000 homes, as well as about 20,000 sqm of employment land. We are also mindful of potential unmet needs emerging from Chichester District, Waverley Borough and other Surrey authorities, and will assess the extent to which these relate to East Hampshire’s housing market geography if and when the need to do should arise.

At this time, it is currently unknown whether EHDC will be able to meet its own disaggregated housing needs and therefore through due assessment will need to consider to what extent we can meet unmet needs from elsewhere in our Local Plan. 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.

### **Traveller Accommodation**

Equally, further clarification is needed on the spatial unmet need for Traveller and Travelling Showpeople accommodation, and the status of the evidence base. EHDC is still relying on the East Hampshire GTAA 2024, which assesses needs within East Hampshire including the

SDNP. The letter received references the 'South Downs National Park Authority, Adur and Worthing Councils, and Brighton & Hove City Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment' and likewise as stated with housing, it would be inappropriate for EHDC to accommodate unmet housing needs arising from parts of the National Park that have no functional housing market or economic relationship with East Hampshire. To further the discussion, EHDC would like to understand the outstanding need for Traveller and Travelling Showpeople accommodation (taking account of commitments/completions), in the SDNP within East Hampshire to enable us to further consider your request.

However, please note the East Hampshire GTAA 2024 identifies a high need for Traveller and Travelling Showpeople accommodation in East Hampshire outside the SDNP, and our priority is attempting to meet our own need, which we may not be able to do and may need to seek assistance from other authorities.

SDNP should consider provision of Traveller accommodation on any large strategic site allocations coming forward through the Local Plan Review.

## **Next Steps**

As set out throughout this response, EHDC considers it is imperative that SDNPA undertakes further detailed work to:

- Identify the spatial distribution of unmet need within the National Park,
- Differentiate need arising close to East Hampshire from that arising in distant, unrelated areas, and
- Clarify the functional housing market and economic relationships associated with each component of unmet need.

Without this evidence, EHDC is unable to consider the request as currently presented. However, once clarified we will consider the unmet housing needs and the unmet Gypsy and Traveller accommodation needs of the National Park as part of our emerging Local Plan evidence base and our statutory duties. We welcome the opportunity to review your site assessment work further and would be pleased to continue discussions on Statements of Common Ground as we all move toward our respective Regulation 19 stages.

Please note that this response has been endorsed by the Portfolio Holder for Regulation and Enforcement, Cllr Angela Glass.

We look forward to further conversations as our plans progress towards Regulation 19 stage and thank you for your positive engagement and co-operation so far. Please do not hesitate to contact us if you would find it helpful to arrange a further meeting.

Yours sincerely,

Adam Harvey

Planning Policy Manager



FAO: Claire Tester  
Planning Policy Manager  
South Downs National Park Authority  
By email

2 February 2026

Dear Claire

### **Housing Need in the South Downs National Park**

Thank you for your letter dated 19 November 2025.

I note that the South Downs National Park Authority (SDNPA) considers that your housing need figure should be based on the Icen report (323 homes per year, equating to 5,814 homes to 2042). I understand that you consider this report, which takes a demographic rather than dwelling stock based approach, better reflects the particular nature of the housing market in the national park (e.g. which has a higher number of second homes and short term lets). The alternative Aecom report, which I understand is based on the Government's 'standard method' calculation, identifies a higher need figure of 1,048 dwellings per annum.

Your letter explains that the SDNPA are likely to be able to meet the need for 323 homes per year, but that in the event that the Local Plan Inspector considers a higher need figure should be used, you would not be able to meet any further needs.

EBC recognise that the South Downs National Park is nationally protected through legislation and policy. Whilst the specifics of your approach will be considered through your local plan process, Eastleigh Borough Council recognise in general terms that the provision of 5,814 homes within the National Park may reflect a positive approach to meeting housing needs in the context of a national park.

We note that your Gypsy and Traveller Accommodation Assessment identifies a need for 73 pitches, as well as 11 plots for travelling show people. I understand that the assessment identifies that this need may be slightly lower if a different definition is used; that the SDNPA is making provision for approximately 40 pitches; and that therefore any unmet need will be significantly lower than the headline 73 / 11 figures cited. Whilst we are not in a position to review the suitability of sites across your authority's area, given the scale of that area, we would hope that your local plan process will consider whether any further provision could be made within the South Downs.



In the event that your Local Plan examiner were to conclude that the SDNPA had an unmet need for housing, Eastleigh Borough Council make the following comments regarding our ability to meet any of that need.

First, any unmet need would relate to all the housing market areas which the SDNPA covers (e.g. stretching from Winchester to Eastbourne). In reality only a small proportion of any unmet need is likely to relate to the housing market area within which Eastleigh Borough is located. EBC would not need to consider the high proportion of any unmet need which does not relate to its area.

Second, Eastleigh Borough's standard method housing need amounts to 18,440 homes (2024 – 2044). Our Issues and Options consultation documents indicate this is likely to generate a need for 9,970 new homes on greenfield sites over this period (in addition to the significant greenfield growth we are already planning for). We need to assess the extent to which we can meet our own needs and contribute to any unmet needs, in accordance with the NPPF as a whole. Whilst the nature of Eastleigh Borough is clearly different to the South Downs, in our own terms our Borough covers a relatively small area and has its own range of national and local constraints. Once the Council has selected its preferred sites it will be in a position to advise on the extent to which it can meet or exceed its own needs.

Third, in the event that Eastleigh Borough were able to exceed its own needs, and therefore make a contribution to unmet needs from the wider area, there may be other authorities in our housing market area with an unmet need which may also make a call on any contribution we might be able to make.

In summary, Eastleigh Borough Council is in the process of establishing through its local plan process whether or not it can make any contribution to wider unmet housing needs. In the event that it were able to do so, for the reasons cited above, the contribution to any unmet needs from the South Downs is likely to be limited.

I hope that helps by setting out our current position. We do of course support continued liaison with yourselves as our local plans progress.

Yours sincerely

Graham Tuck  
Planning Policy Manager  
Eastleigh Borough Council

Claire Tester MRTPI  
 Planning Policy Manager  
 South Downs National Park Authority

**Enquiries to:** David Hayward  
**Direct line:** 07718 125935  
**Email:** david.hayward@havant.gov.uk  
**My reference:**  
**Your reference:**  
**Date:** 28 November 2025

Dear Claire

## **Housing Need in the South Downs National Park**

Thank you for your letter dated 19<sup>th</sup> November 2025 updating us on the progress of your Local Plan and formally requesting assistance from Havant Borough Council with the National Park's unmet housing need.

We are pleased to see the progress that the South Downs National Park Authority is making with its emerging Local Plan, notably the two new studies on housing need which produce two different need figures for the National Park. We also note that you will shortly be publishing an updated Land Availability Assessment and will look forward to responding to your Regulation 19 Local Plan consultation in due course.

Thank you for confirming that the South Downs would be able to meet the Icení housing need figure of 323 homes per year based on the 2023 Housing and Economic Development Needs Assessment produced by Icení. We also note that the earlier AECOM study, points to a significantly higher need figure of 1,048 homes per year which the National Park would not be able to meet.

In the event that the Planning Inspectorate concludes that the AECOM method for calculating housing need is the sound approach, we note your formal request to accommodate unmet housing needs of the National Park within Havant Borough. As you know, Havant Borough Council is in a position of being unable to meet the Borough's own housing need by a wide margin. As Havant Borough cannot meet its own housing need, it cannot help South Downs National Park Authority with its unmet housing need.

We have similarly approached neighbouring local authorities and those within the Housing Market Area, notably Chichester District Council, East Hampshire District Council and Winchester City Council. Significant parts of these Districts are of course covered by the South Downs National Park. We will keep you updated on the progress of our negotiations with these authorities. However, at this stage you will be aware that we have an interest in the outcome of the Winchester Local Plan Examination, which includes an unmet needs allowance for Havant. This has reduced significantly from when the Plan was submitted but

currently stands at 346 dwellings<sup>1</sup> based on the Proposed Main Modifications. This compares with our unmet need position of at least 10,622 dwellings.

### **Gypsy and Traveller Accommodation**

Thank you for updating us on your position regarding Gypsy and Traveller and Travelling Showpeople Accommodation and your recent 'call for sites'.

By way of background, the Council's 2024 Gypsy and Traveller Accommodation Assessment concludes that there is no identified unmet need for Gypsy and Traveller pitches or Travelling Showpeople plots within Havant Borough. Though the 2017 joint GTAA did identify that Havant Borough had a need to provide 1 pitch, this need has now been met through a permission for 2 pitches at a site in Long Copse Lane in northern Emsworth. The Draft Local Plan proposes to safeguard this site for current need. For completeness, we can also confirm we have not had any potential gypsy or traveller sites submitted for consideration through the local plan.

The Council is currently in the process of procuring an addendum to the Gypsy and Traveller Accommodation Assessment and we will be happy to keep you updated on the progress of this.

In terms of our ability to assist with the need for meeting Gypsy and Traveller Accommodation, Havant Borough is significantly constrained, with limited land available for development. As set out above, Havant Borough is unable to meet its own general housing need. For this reason, Havant Borough is unable to assist with the unmet gypsy and traveller needs arising from the South Downs National Park at this time.

Nevertheless, we welcome the Authority's willingness to continue dialogue with us and our respective Local Plans. We will look forward to preparing a Statement of Common Ground to support our respective Regulation 19 Local Plan consultations in due course.

Yours sincerely

Strategic Planning Manager

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<sup>1</sup> MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>



Claire Tester  
 Planning Policy Manager  
 South Downs National Park Authority  
 Emailed to [Claire.testers@southdowns.gov.uk](mailto:Claire.testers@southdowns.gov.uk)

Our ref:  
 Your ref:

23 December 2025

Dear Claire,

**Re: Housing Need in the South Downs National Park**

Thank you for your letter of 19<sup>th</sup> November 2025 regarding housing and Gypsy and Traveller needs in the South Downs National Park.

Before responding to your specific requests, it is worth highlighting contextual matters of relevance to your letter that have occurred since we last formally corresponded, to which you will already be aware.

Water Neutrality

On 31 October 2025, Natural England withdrew its September 2021 Position Statement, which required new developments in the Sussex North Water Resource Zone (SNWRZ) to be water neutral. The SNWRZ includes all of Horsham District, and this requirement significantly slowed development. This is clearly illustrated by in the government's housing delivery test outputs: it dropped from 155% in 2021 to 62% in 2023, and is expected to fall further in 2024. Similarly, our housing land supply fell from 5.3 years in 2021 to now 1.7 years in the latest report.

It is hoped that the withdrawal of the Position Statement will, over the medium and long-term, lead to an uptick in development activity. However, you will understand that the withdrawal of the Position Statement is unlikely to have a meaningful immediate impact on improving our housing land supply in the very short to medium term, due to the time it takes to prepare and determine planning applications. Further, as the delivery test is backward looking, the legacy of water neutrality will remain for some time.

Horsham District Local Plan Examination

You are aware that the Horsham District Local Plan was submitted for examination in July 2024 and that a full, four-week, hearing schedule was arranged. After the first week of hearing sessions, the Inspector cancelled subsequent hearings and in April 2025, he submitted his Initial Findings Letter, recommending that we withdraw the Local Plan from examination.

The Council has been corresponding with the Inspector since then. A letter of 11<sup>th</sup> November 2025 reiterated the Council's belief that the Duty to Cooperate had been met and that hearings should recommence. It highlighted the withdrawal of the Natural England Position Statement, reaffirmed the Council's commitment to exploring further options to increase planned levels of growth, and pointed to correspondence between the Housing and Planning

Minister and the Planning Inspectorate about Inspectors adopting a pragmatic approach when examining Local Plans.

In response to our letter and taking account of a ministerial statement and related letter to the Planning Inspectorate from the Housing and Planning Minister related to the Duty to Cooperate, our Local Plan Inspector wrote to the Council on 28<sup>th</sup> November offering the Council an Exploratory Meeting to discuss how to progress the Local Plan. This offer has been accepted, and we are in the process of confirming details and arranging a date. This will be publicised when the arrangements are finalised.

### Housing Needs

The National Park has not requested, nor does Horsham District Council have a formal view at this time, on which approach the SDNPA should take with regards to identifying a housing need figure. We recognise that due to the nature of your administrative boundaries, crossing multiple different local authority areas, Planning Practice Guidance allows for a bespoke method of identifying a housing need figure. That said, we hope that should will be possible for the National Park to be able to demonstrate that it can exceed the preferred need figure of 323 homes per year, and that opportunities to do so are investigated in full by the SDNPA, particularly when taking account of the significant need for housing outside but close to your administrative boundaries.

You will know that our submitted Local Plan did not meet the standard method derived figure for Horsham District (as per the September 2023 version of the NPPF). This figure includes needs arising from parts of the district within the South Downs National Park. As we set out in a letter to you on 17 April 2025, the Council's view is that the figure of 31 homes (as reconfirmed by the AECOM study) is not insignificant over a 17-year period as it amounts to 527 homes.

Given that we are not currently meeting calculated needs in Horsham District (which includes a proportion of your needs), we are not able to commit to assisting with further unmet needs arising from your authority at this stage.

The Council has outlined to the Local Plan inspector that with the change in circumstances and the withdrawal of water neutrality that it is open to proposing modifications to the submitted Local Plan through the examination process to identify greater levels of growth. Any next steps will be subject to the outcome of the procedural /exploratory meeting, but in the event that the plan proceeds any decisions will be evidence-led, looking at what can be sustainably accommodated.

Whilst no decisions have been made with regard to the Council's emerging local plan, (or the timescales for progressing a new-style Local Plan, noting the latest government consultation and forthcoming regulations). It should be noted that as agreed in the North West Sussex Housing Market Area Statement of Common Ground, should we be able to plan for levels of growth beyond our needs, we would first look to apportion any additional growth to meeting unmet needs in Crawley Borough in the first instance.

### Gypsy and Traveller Needs

As explained in our letter of 24 November 2023, our submitted Local Plan allocates enough land to meet Gypsy and Traveller accommodation needs for the first ten years of the plan period, but is unable to meet needs for the entirety of the plan period when considering needs arising from all components of the Gypsy and Traveller population. This figure takes account of multiple calls for sites to maximise the amount of allocations that we could make, together

with seeking the delivery of land for this type of accommodation within strategic site allocations.

As such, we wrote to all neighbouring authorities (including yourselves), asking for assistance in meeting unmet needs. Regrettably, we did not receive any positive responses. Given this position, it follows that we are unable to assist with unmet needs arising elsewhere.

We trust that the above is clear. If you require clarification about the contents of this letter, please contact Tal Kleiman, Principal Planning Policy Officer on 01403 215213 or [tal.kleiman@horsham.gov.uk](mailto:tal.kleiman@horsham.gov.uk) in the first instance.

Yours sincerely,

Catherine Howe  
Head of Strategic Planning

Your ref:  
 Our ref: 7.3 DtC  
 Please ask for: Mrs Holly Harrison  
 Direct dial no: 01424 787602  
 Date: 23 January 2026



Claire Tester MRTPI  
 Planning Policy Manager  
 South Downs National Park Authority  
 By email only: Claire.Tester@southdowns.gov.uk

**Lorna Ford**  
 Chief Executive  
 Town Hall  
 Bexhill-on-Sea  
 East Sussex TN39 3JX

Dear Claire,

### **Housing Need in the South Downs National Park**

Thank you for your letter dated 19<sup>th</sup> November. Please accept my apologies for the delay in responding.

In your letter you have asked for our response to the following two questions:

1. *In the event that the Planning Inspectorate prefers the AECOM method for calculating housing need, then the South Downs National Park Authority (SDNPA) is formally requesting that your Council accommodates the unmet housing needs of the National Park within your local planning authority area. The overall unmet need figure is likely to be approximately 700 homes per year, although exact provision numbers are still being finalised.*
2. *The SDNPA is also formally requesting that your Council accommodates the unmet gypsy and traveller needs of the National Park within your local planning authority area.*

Please find our responses to these questions below.

#### Question 1 - Housing Need

Rother District Council is currently preparing to launch the second Regulation 18 consultation on our draft Local Plan. This follows on from the first Regulation 18 consultation in Summer 2024. Since the 2024 consultation we have carried out a thorough review of our Housing and Economic Land Availability Assessment (HELAA) and also reviewed the proposed development strategy in response to representations received to our first consultation. Key purposes of this work have been to seek to identify more suitable land for development and to ensure densities are maximised appropriately in order to make the best use of suitable land. This has been necessary in light of the Government's aim to significantly increase house-building, and because of an increase in Rother's Local Housing Need (LHN) (assessed using the Standard Methodology in line with the NPPG and PPG).

Despite this additional work carried out, Rother District Council is unable to meet its own Local Housing Need. Indeed, we are likely to have a significant shortfall, much like the

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SDNPA. Specifically, our second Regulation 18 consultation will propose 495 dwellings per year, over our 17-year plan period. Whilst this is a significant increase on current levels of housing delivery, it compares to Rother's LHN figure of 912 dwellings per year, meaning we are proposing to meet just over 50% of our target. A key reason that we cannot meet the LHN figure is the district's significant environmental constraints, with some 83% of our land being within the High Weald National Landscape, a Protected Landscape with the same level of protection as the National Park, and a further 7% comprising protected habitats sites.

Consequently, unfortunately, Rother District Council is unable to assist with accommodating any of the SDNPA's unmet housing need because we cannot meet our own housing need, that is, we have our own significant shortfall.

### Question 2 – Gypsy and Traveller accommodation need

As you know, Rother District Council is part of the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, along with the SDNPA and the other East Sussex local authorities. Consequently, we are committed to working together with the Group on strategic planning matters affecting GTTSPs.

The East Sussex Gypsy and Traveller Accommodation Needs Assessment (GTAA) (2022) identified a need for Rother of 28 pitches for gypsies and travellers, to 2040 (and no TSP need). Since that time, we have granted planning permission for ten pitches and we will be consulting on proposed site allocations to accommodate another 19 pitches as part of our forthcoming Regulation 18 consultation. Consequently, while we *may* well be able to meet our own needs (subject to the outcome of the Regulation 18 consultation), at this moment in time we are unable to commit to assisting the SDNPA in meeting their own unmet need for G&T pitches for the following reasons:

- As discussed by the Working Group, an update to the East Sussex GTAA is being commissioned and will be complete later this year. This may result in a different need figure for Rother district.
- Our proposed site allocations seek to meet our need but allow for only one additional pitch. Consequently, if any of these allocations do not progress to the Regulation 19 Local Plan we will not be able to meet our own need.

We will, however, continue to actively consider this issue over the coming months, as part of the Working Group.

In conclusion, while RDC is unable to assist the SDNPA in meeting its unmet development needs, we are keen to work with you in relation to strategic planning matters and we would welcome a Duty to Co-operate meeting between our two authorities and potentially a Statement of Common Ground.

We will be consulting you in the coming days on our Regulation 18 consultation and we look forward to continuing our positive working relationship. I also wish you the best of success with your new Local Plan.

Yours sincerely

Mike Hughes, Head of Planning  
Rother District Council

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**From:** Daniel Hawes <daniel.hawes@hart.gov.uk>  
**Sent:** 17 March 2026 12:15  
**To:** Claire Tester  
**Subject:** South Downs National Park Unmet Needs Letter  
**Attachments:** Letter to LPAs re SDNP Unmet Housing and Gypsy and Traveller Needs.HartDC.pdf

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Claire,

Thank you for your letter of 19th November 2025 concerning unmet needs for housing and for travellers sites in the South Downs National Park.

The Council is not in a position to agree to meet any unmet housing needs or unmet needs for travellers.

We are at the start of a new local plan process. We cannot yet demonstrate that we can meet our own housing needs. In December 2024 our local housing need figure increased from approximately 300 homes per annum to currently 771 homes per annum.

Similarly for travellers, we have an unmet need ourselves, and are about to update our Gypsy and Traveller Accommodation Assessment.

Furthermore, it is debateable as to whether Hart should be regarded as a 'neighbouring area' under the NPPF. Hart does not adjoin the South Downs National Park and even the northern extremities of the National Park are south of the A31.

This response has been signed off by the Portfolio Holder for Planning Policy, Graham Cockarill.

Daniel Hawes

Planning Policy and Economic Development Manager

Hart District Council

01252 774120

<http://www.hart.gov.uk>

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Facebook: [/HartDistrictCouncil](https://www.facebook.com/HartDistrictCouncil)

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**From:** Claire Tester <Claire.Tester@southdowns.gov.uk>  
**Sent:** 19 November 2025 15:30  
**To:** Daniel Hawes <daniel.hawes@hart.gov.uk>  
**Subject:** External - South Downs National Park Unmet Needs Letter

**Caution:** This is an external email and was sent from outside of Hart District Council and could contain suspicious content. Please take care when clicking links or opening attachments. When in doubt, contact IT at office365@hart.gov.uk

Dear Daniel,

Please see my attached letter.

Regards,

Claire Tester MSc MRTPI  
Planning Policy Manager  
South Downs National Park Authority  
Tel: 01730 819312  
M: 07387 107720  
South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH  
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Claire Tester  
 Planning Policy Manager  
 South Downs National Park Authority

Strategic Planning and Growth Service  
 Beech Hurst  
 Weyhill Road  
 Andover, Hants SP10 3AJ  
 Telephone 01264 368000  
 Web site [www.testvalley.gov.uk](http://www.testvalley.gov.uk)

**Contact:** Clare Roberts  
**Telephone:** 01264 368000  
**E-mail:** [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk)  
**Your ref:**  
**Our ref:**  
**Date:** 19 December 2025

Dear Claire,

### **Housing Need in the South Downs National Park**

Thank you for your letter dated 19<sup>th</sup> November 2025 providing an update on the publication of two new studies on housing need and a request to assist in meeting housing and gypsy, traveller and travelling showpeople needs. We welcome opportunities to engage and collaborate on strategic planning matters, policies and cross boundary issues.

Test Valley are also currently in the process of preparing a new Local Plan, with the most recent consultation having taken place over the summer (Revised Regulation 18). This focused on responding to the revised NPPF (December 2024) and change to the standard method, which resulted in a significant increase to our local housing need. We are continuing to work towards the timescales set out in our Local Development Scheme, with the intention to submit the draft plan for examination prior to the end of 2026.

We note the findings of the two recent studies undertaken on housing need by: AECOM (October 2025), and Icení HEDNA Addendum (November 2025), with the housing need figure from the latter (323 homes per year), providing an alternative approach to the standard method, based on 5 principles agreed by the 10 English National Park and the Broads, being considered by the NPA the most appropriate figure which to plan for in your emerging local plan. Given the applicable planning constraints and specific circumstances of national parks, we appreciate the rationale for this approach.

Based on the published GTAA 2021 and our most recent published five year supply position statement (2023) we are not able to demonstrate a five year supply of pitches or plots. The latest published position for Gypsies and Travellers is 1.1 years and for Travelling Showpeople is 0 years. The Regulation 18 (Stage 2) Plan 2024 identified our draft approach for meeting these needs which included assessing the capacity and site deliverability of permanent sites, whether existing sites could have small scale extensions and to consider sites promoted through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Reflecting the planning constraints at our existing sites and the very limited

number of sites promoted through the SHELAA, it is going to be a challenge to meet our own needs. Therefore, reflecting this, Test Valley Borough Council are not in a position to be able to assist in meeting the South Downs National Park Authority's needs.

We welcome further and continuing engagement with you on our respective emerging Local Plans. Please contact Clare Roberts ([clroberts@testvalley.gov.uk](mailto:clroberts@testvalley.gov.uk) - Planning Policy Manager) and Leah Pearce ([lpearce@testvalley.gov.uk](mailto:lpearce@testvalley.gov.uk) - Administrative Assistant) in regards to Duty to Cooperate meetings.

Yours faithfully,

Clare Roberts

Strategic Planning and Growth



South Downs National Park Authority  
Contact: Adrian Fox

PlanningPolicy@Winchester.gov.uk  
Direct Line:01962 848278

11<sup>th</sup> December 2025

Dear Claire,

**Subject: Housing Need in the South Downs National Park**

Thank you for your letter dated 19 November 2025 regarding housing need in the South Downs National Park.

**Housing unmet need**

You will be well aware that around 40% of the City Councils geography is covered by the South Downs National Park. As there is a growing wider unmet housing need across Hampshire, we strongly feel that all Hampshire councils and beyond have a role to play and we all need to work collaboratively to plan strategically for this unmet housing need.

**Meeting the unmet housing need**

It is recognised that there are Local Planning Authorities in Hampshire and beyond are all located in different housing market areas. However, we consider that at your Local Plan examination you should be able to demonstrate to a Local Plan Inspector that you have left 'no stone unturned' in responding to the housing unmet need that has been identified in the AECOM report particularly as this represents 40% of the City Councils geographical area. In view of this we would strongly encourage the South Downs National Park to be proactive and to approach other Local Planning Authorities in Hampshire and wider Local Planning Authorities which are located outside of your Housing Market Area. We consider that this is important as you must be able to clearly demonstrate to a Local Plan Inspector that you have continued to work constructively on cross boundary issues such as housing unmet need. In addition to this your Local Plan is in line with the policies in the NPPF on 'maintaining



effective co-operation' and in accordance with the Government's '[Reforming Local Plan-Making](#)' Written Ministerial Statement published on 27<sup>th</sup> November 2025.

Winchester City Council have for example, been approached by other Local Planning Authorities which are located outside of our Housing Market Area. We would bring to your attention Chichester District Council which has recently successfully gone through a Local Plan examination which included a housing requirement that was below their Standard Method. As part of their evidence base under the Duty to Cooperate we are aware that they did approach local planning authorities that were located outside of their Housing Market Area. This is evidenced by the fact that we received and responded to a Duty to Cooperate letter from them. Linked to this, given the unmet housing need we would also strongly encourage the National Park to respond as we are to any Local Plan consultations in Hampshire as this is a joint issue that all local authorities need to approach in a consistent way given the importance of this matter. This will also in our professional opinion, strengthen your case at your respective Local Plan examination.

### **Gypsy and Traveller Accommodation**

We acknowledge your request to accommodate unmet gypsy and travellers in the National Park. You will be aware of our correspondence with the National Park prior to the start of our Local Plan examination that the City Council is unable to meet its own needs for Gypsy and Travellers. This is documented in our [Gypsy and Travellers Topic Paper](#) which provided the necessary evidence at our Local Plan examination that we had not 'left any stone unturned'. As we are unable to meet our own need for Gypsy and Travellers, we cannot meet any additional needs arising for Gypsy and Travellers in the National Park.

### **Winchester City Council's Local Plans**

My team's primary focus is moving the emerging Local Plan forward to adoption. As you will be aware we are currently out for a 6 week public consultation on the [Main Modifications](#) and then onto subsequent adoption as soon as possible next year.

### **Next Local Plan**

Whilst progressing the emerging Local Plan towards adoption is our number 1 priority some initial work has started on progressing work on the next Local Plan which will cover the period up to 2044.

This work has involved commissioning AECOM to undertake an Integrated Impact Assessment/Habitats Regulations Assessment and appointing consultants to undertake an updated Employment and Retail Assessment. A new 'Call for Sites' closed on the 21<sup>st</sup> November 2025. However, no detailed work on the process on how to meet the increase in our Standard Method figure has been undertaken, and ultimately therefore, what contribution we might be able to make to unmet needs from neighbouring authorities. However, I must stress that all of the above work has now been temporarily paused to enable us to progress the emerging Local Plan towards adoption.

We do acknowledge the importance of planning for unmet needs across Hampshire and remain committed to working collaboratively with all of the authorities across Hampshire (and beyond). However, given the early stage of our Local Plan Review, it would be premature to make any firm commitments regarding the accommodation of unmet housing need at this time as we have not yet mapped out the process that we intend to follow.

We look forward to continuing constructive dialogue and joint working with you. We would be happy to meet in February/March 2026 to discuss an updated Statement of Common Ground.

Yours sincerely,

**Adrian Fox**

Strategic Planning Manager  
Winchester City Council