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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 Iceni 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 Iceni 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 Iceni 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 Iceni 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,

A handwritten signature in black ink that reads "Adam Harvey". The signature is fluid and cursive, with a small star-like flourish at the end of the "y".

Adam Harvey

Planning Policy Manager