



**Ministry of Housing,
Communities &
Local Government**

Matthew Pennycook MP

Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Our reference: MC2025/26375

Cllr Richard Millard
Leader – East Hampshire District Council

Damian Hinds MP
Member of Parliament for East Hampshire

Greg Stafford MP
Member of Parliament for Farnham and Bordon

5 January 2026

Dear Richard, Damian and Greg,

Thank you for your letter of 18 September regarding the operation of the Housing Delivery Test (HDT). I echo your thanks in respect of the constructive conversations we have had in relation to the standard method for calculating housing need and I appreciate your continued engagement with the Department.

As you clearly set out in your letter, the HDT does not apply to National Park Authorities or the Broads Authority, in recognition of the distinct planning context in these areas. National Parks operate under a separate planning framework, with a particular emphasis on conserving landscape and heritage, and on supporting the delivery of social and affordable housing for local communities, rather than accommodating large-scale development.

The concerns you raise regarding the application of HDT across districts with split planning responsibilities are noted. However, while your current local plan was adopted in 2019, due to the backward-looking nature of the HDT it will continue to be relevant for the upcoming 2024 and the majority of the 2025 publications. It is also worth noting that no adjustments are made to the net additional dwellings statistic for local authorities judged against LHN who overlap with national parks, meaning that the dwellings delivered in the South Downs portion of your district count towards your net additions for HDT purposes.

The HDT methodology is designed to ensure consistency and transparency across all authorities. As HDT figures are not subject to examination by the Planning Inspectorate (PINS) and there is currently no mechanism in place to verify alternative locally derived figures. Any departure from the standard method when calculating the homes required figure for those LPAs with out-of-date plans would therefore present challenges in terms of scrutiny, comparability, and accountability.

Unfortunately, due to current diary pressures I am unable to meet with you at this time. However, I encourage your continued engagement with the Department and would like to thank you again for your letter.

Best wishes,

A handwritten signature in black ink, appearing to read 'M. Pennycook', with a large, stylized flourish at the end.

MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning