13 March 2024

Alex Robinson
Executive Head of Place
Havant Borough Council
By email only to [redacted]

Dear Alex

Havant Borough's Emerging Local Plan – Duty to Cooperate

Thank you for your letter dated 5th March 2024 about the progression of your Local Plan and identified unmet needs for homes and potentially employment space. Mike Hughes has asked me to respond.

The SDNPA is at the early engagement and evidence gathering stage of its Local Plan Review. The timetable was agreed at our full National Park Authority meeting on 14 December 2022 which see us at Regulation 18 stage early 2025, Regulation 19 stage early 2026 and submission stage mid 2026.

A housing and economic development need assessment (HEDNA) has been prepared for the National Park using a locally derived methodology for housing need as recommended by Planning Practice Guidance. This HEDNA is available on our website at Housing and Economic Development Needs Assessment 2023 - South Downs National Park Authority

In addition, a call-for-sites for development, biodiversity net gain offsetting, nutrient offsetting and renewable energy was carried out in Summer 2022; assessments of these sites are underway and we hope to publish this Land Availability Assessment later this Spring, at Land Availability Assessment (LAA) - South Downs National Park Authority. Other evidence base studies and statutory assessments are also being progressed. Over the next six months we will be working up potential allocations and policies for inclusion in a draft Plan for consideration by our members in the Autumn of 2024. Until this work is complete we will not know if we are able to meet the needs identified in the HEDNA.

At present we are assuming that the Local Plan Review will progress under the new planning system introduced under the Levelling Up and Regeneration Act 2023, but this depends on the progress Government makes this year with secondary legislation, guidance and National Development Management Policies. A report setting out our approach to preparing a Local Plan in this dynamic national context is going to our members tomorrow and is available on our website at Planning Committee 14 March 2024 - South Downs National Park Authority. Appendix 1C is a Cooperation and Alignment Strategy setting out how we intend to meet the Duty to Cooperate and its successor the Alignment Test.

Paragraph 182 of the December 2023 NPPF states that national parks have the highest status of protection in relation to landscape and scenic beauty, and that the scale and extent of development within all these designated areas should be limited. The PPG also says national parks "*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*" (Paragraph: 041 Reference ID: 8-041-20190721).

Paragraph 28 of the National Parks Vision and Circular 2010 says the Authorities' primary responsibility is to deliver their statutory purposes. Furthermore, Section 245 of the Levelling Up and Regeneration Act 2023 requires all relevant authorities, including Havant Borough Council, to seek to further the purposes of the National Park. These purposes are:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

For the above reasons it is unlikely that the South Downs National Park will be able to accommodate any unmet need arising in Havant Borough.

However, we can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes and I would be happy to meet with you to explore opportunities further, including signing a Statement of Common Ground.

My current availability is set out in the covering email.

Yours sincerely

[redacted]

Claire Tester
Planning Policy Manager

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