26 June 2025

David Hayward
Strategic Planning Manager
Havant Borough Council

SENT BY EMAIL

Dear David

Re: Update from Havant Borough Council regarding assistance with unmet housing and employment need under the duty to cooperate.

Thank you for your letter dated 12 June 2025 in relation to Havant Borough Council's formal request of the South Downs National Park Authority to assist in meeting the unmet need of 9,292 dwellings and 51,424sqm employment floor space arising from Havant Borough.

We appreciate there is a lack of suitable land within Havant Borough to meet residential and employment needs. The Havant Borough Sustainability Appraisal sets out four development options – ranging from a brownfield focus to a full housing delivery focus – and none of these options can meet identified needs given the constraints set out in the Havant Borough Constraints Study (i.e., flood risk and national designations etc.).

The South Downs National Park Authority (SDNPA) previously explained in its letter dated 13 March 2024 that it was unlikely that the National Park would be able to accommodate any unmet needs arising from Havant Borough. In light of updated national planning policy and the evolving evidence base of the South Downs Local Plan Review, it is with regret that we must confirm that the **National Park will not be able to accommodate any unmet needs arising from Havant Borough**. The collective reasons for this are as follows:

- The **National Parks and Access to the Countryside Act 1949** – as amended by Section 245 of the Levelling Up and Regeneration Act 2023 – requires all relevant bodies to seek to further the purposes of the South Downs National Park. These purposes are to conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- The **DEFRA Circular for English National Parks and the Broads (2010)** recognises that National Parks are not suitable locations for unrestricted housing – see Paragraph 78.
- The **National Planning Policy Framework (NPPF)** explains that the scale and extent of development within protected landscapes should be limited – see Paragraph 189.
- The **National Planning Practice Guidance (PPG)** explains that National Parks are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas – see Paragraph 041, Reference ID 8-041-20190721.

- The SDNPA is "leaving no stone unturned" in the preparation of the South Downs Local Plan Review and is working with neighbouring authorities (such as East Hampshire and Winchester Councils) to understand how standard method figures could be apportioned between areas inside and outside of the National Park. Although this work is still ongoing, it is clear from the emerging evidence base of the South Downs Local Plan Review that the National Park will not be able to deliver enough homes to meet the equivalent of the standard method within its boundary.

Although we are not able to accommodate any unmet needs arising from Havant Borough, we are committed to continuing liaison and joint working with Havant Borough Council towards achieving effective outcomes, including the signing of a Statement of Common Ground (SoCG). Further comments are set out in the SDNPA's formal response to the Regulation 18 consultation of the Havant Borough Local Plan 2043.

We wish you well with the progression of your local plan.

Yours sincerely

[redacted]

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