

19th November 2025

Portsmouth City Council
FAO Lucy Howard
Emailed to Lucy.Howard@portsmouthcc.gov.uk

Dear Lucy,

Housing Need in the South Downs National Park

I wanted to alert you to the publication on our website of two new studies on housing need. These studies are necessary because the Standard Method figures provided by Government are based on local authority areas which do not align with the National Park boundary. The Planning Practice Guidance states

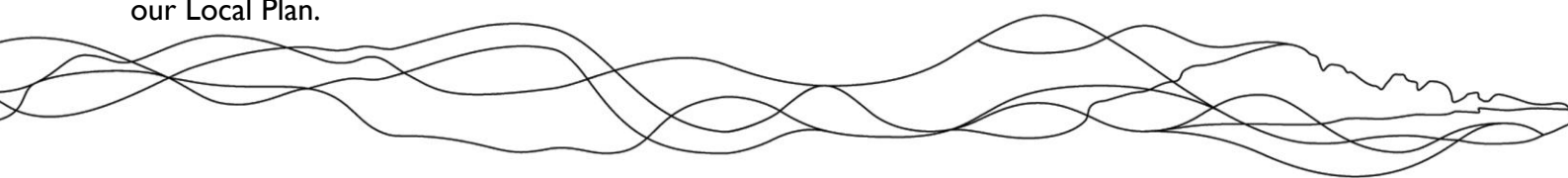
“Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small, an alternative approach may have to be used.

Such authorities may continue to identify a housing need figure using a method determined locally. In doing so authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. In the absence of other robust affordability data, authorities should consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s)”. 2a-014-20241212

The studies can be viewed at [Housing and Economic Development Needs Assessments - South Downs National Park Authority](#) and are:

- The AECOM study, which was jointly commissioned by the South Downs NPA and Lewes, Chichester, East Hampshire and Winchester Councils, in consultation with the other affected 8 councils. This takes the Standard Method figures issued by Government for the 12 councils with land within the National Park, and apportions them between the National Park and the rest of the council areas based on the proportion of existing homes in each area. This approach results in a need figure of **1,048 homes per year** for the National Park.
- An Addendum to our 2023 Housing and Economic Development Needs Assessment, produced by Icen, which provides an alternative approach to housing needs based on principles agreed by the 10 English National Parks and the Broads. This Addendum establishes that the appropriate housing need figure for the South Downs is **323 homes per year** (or 5,814 new homes between 2024 and 2042).

The South Downs NPA considers that **323 homes per year** is the most appropriate figure to use for housing needs in the National Park as it reflects the unique demographic characteristics of the area. Therefore, this is the housing need figure that we will be using in our Local Plan.



We are currently finalising our Regulation 19 Local Plan and will be shortly publishing our updated Land Availability Assessment. Through a robust process, the Authority has considered all known potential development sites and is proposing to allocate **all** those sites found to be suitable, achievable and available for housing development. This results in a provision figure based on the landscape capacity of the National Park to accommodate development without conflicting with its statutory purposes.

Indications are that we will be able to meet the Iceni housing need figure of 323 homes per year. However, we will not be able to meet the AECOM figure of 1,048 homes per year.

In the event that the Planning Inspectorate prefers the AECOM method for calculating housing need, then **the Authority 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.

Gypsy and Traveller Accommodation

The most recent calculation of Gypsy and Traveller and Travelling Showpeople Accommodation is contained in the [South-Downs-Brighton-and-Hove-and-Adur-and-Worthing-GTAA-Final-Report-December-2024.pdf](#) This concludes that there is a need for 73 gypsy and traveller pitches and 11 travelling showpeople plots over the plan period to 2042.

The Authority has carried out three 'call for sites' exercises for gypsy and traveller sites, the last as part of joint working with the East Sussex Local Planning Authorities. Whilst some site assessments are still in progress, based on the submissions we will not be able to meet our overall needs. **The Authority is therefore formally requesting that your Council accommodates the unmet gypsy and traveller needs of the National Park within your local planning authority area.**

We would welcome your peer review of our site assessment work so that you can satisfy yourselves that we have taken a robust approach and sought to maximise our supply where this is compatible with our statutory purposes. Please let me know if you wish to meet with us to discuss any sites or other strategic matters, and whether you consider that a Statement of Common Ground between us would be useful.

Yours sincerely,



Claire Tester MRTPI
Planning Policy Manager
Claire.Tester@southdowns.gov.uk
07387 107720

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810
E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Sion McGeever

