

Statement of Common Ground

Sport England &
Havant Borough Council

August 2026

Introduction

1. This Statement of Common Ground (SoCG) is a jointly agreed statement between Sport England (SE) and Havant Borough Council (HBC). It sets out matters that are agreed between the two parties in relation to the preparation of the Havant Borough's new Local Plan – the Building a Better Future Plan (BBFP).
2. The purpose of a Statement of Common Ground is to set out the confirmed agreements and disagreements with regard to strategic and cross- boundary issues surrounding Havant Local Plan. This is the result of early, meaningful and continuous engagement between the Local Planning Authority and statutory consultees and key stakeholders in the Local Plan process.
3. Sport England are a government body responsible for growing and developing grassroots sport and encouraging people to become more active across England. Sport England's role in the planning system is as a statutory and non-statutory consultee as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in Government Planning Practice Guidance.
4. Further to the Consultation on the 2025 Draft (Regulation 18) Local Plan in the period between May and June 2025, Sport England submitted representations related to several policies. Among the comments was an objection to the allocation 7 (Former Oak Park School Site) for housing. Sport England was of the view that a proposed development within that site would result in the loss of a playing field to residential development. As such, Sport England indicated that they would likely object to an allocation on the site.
5. The Council reached out to Sport England and clarified that the site has been vacant for several years and that the information regarding the use of site as a playing field was outdated. Further to an exchange of emails, Sport England indicated that they consider that the site has not accommodated a "playing pitch" as defined in the DMPO 2015 (Development Management Procedure Order) and confirmed that they would like to withdraw their objection to this site's allocation.
6. Sport England have also made comments on several other policies. A full breakdown of SE's representation is provided in Appendix 1, along with the Havant Borough Council response and action in regard to each comment.

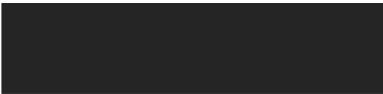
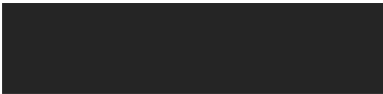
Cooperation and Engagement

7. Further to Reg 18 representations, the Council engaged in discussions with Sport England to address further concerns and comments on revised policies and allocations. Following an exchange of emails, amendments on several policies have been made, where relevant. Appendix 1 provides more details on further comments by Sport England and the Council's response and action.
8. As such, both signatories agree that there are no remaining areas of disagreement and Sport England are satisfied that the Building a Better Future is both legally compliant and sound.

Ongoing Cooperation

1. Havant Borough Council will continue to work with Sport England (SE) in their role as a statutory consultee for plan-making and planning applications. SE's expert advice may be sought in relation to specific sites or assets.

Signatories

This statement has been prepared and agreed by the following organisations	
Havant Borough Council	Sport England
Signature 	Signature 
David Hayward Strategic Planning Manager Date: 13 th August 2026	Owen Neal Planning Manager Date: 24 th July 2026

Appendix 1: Sport England Response to the Building a Better Future Plan Publication Draft

The tables below summarise the comments made by Sport England during the Reg 18 Consultation on Havant Local Plan (BBFP) and the Council's response and action further to the comments.

Support comments have been noted but are not all included in the tables below.

1. Policies/ Evidence-based reports:

Sport England Comment	HBC Response/ Action
Playing Pitch Strategy Indoor Built Sports Facility Strategy Sport England welcomes Havant Borough Council's approach to develop their evidence bases for both outdoor and indoor sports facilities. Sport England considers that the assessments and strategies put the council in a strong position in relation to understanding their current and future needs for sports provision and playing field. Sport England will expect the council to undertake annual reviews of the PPS in accordance with Sport England guidance.	Support noted. No further action required. <i><u>Further response:</u></i> <i>The Council will continue working with Sport England to organise and undertake regular reviews of the Playing Pitch Strategy.</i>
Policy 12: High Quality Design Sport England has in partnership with the Office for Health Inequalities and Disparities (OHID) produced Active Design guidance aimed at developers and local authorities alike to support them in designing and planning healthy and active communities and developments which embed physical activity into the their design and layout. Sport England considers that there is significant synergy between our Active Design guidance and the local plan policy on High quality development. Sport England would welcome reference to our Active Design guidance within the local plan policy.	Points raised are addressed in Policy 12 (Health) which explicitly refer to the Active Design guidance. High Quality Design policy refers to Health policy for more details on active design and healthy communities. <i><u>Further response:</u></i> <i>Following further discussions with SE, a reference to Active Design guidance has been added to the policy and supporting text (Criterion p; paragraph 4.17)</i>
Policy 51: Sports and Recreation Facilities Sport England welcomes the intention behind policy 51 to protect existing sport and recreation facilities. However, we consider the policy wording should be improved to ensure consistency with paragraph 104 of the NPPF. The current drafting states: "Development which results in a loss of a sports or recreation facility will only be permitted where: c) The facility is surplus to requirements; and either d) Replacement provision is made available of equivalent or greater community benefit in terms of quality, quantity and accessibility; or e) The development is for an alternative type of sports and recreation or ancillary provision, the need for which clearly outweighs the loss." Sport England considers that	Amended points (c) and (e). It is noted that para 4.539 (now 4.540) already addresses explicitly the requirement for a robust assessment of need to demonstrate that the "lost" facility is a surplus.

part c) should be amended to make clear that when demonstrating the facility is surplus to requirements this is based on a robust assessment of need. Part e) should also be amended to ".....where the benefits outweigh the loss" <u>Further comments:</u> <i>Sport England welcomes the thrust of the policy which seeks to protect existing sports facilities and playing land from development which would result in their loss. Sport England has the following comments:</i> <i>Under b), would it be possible to include a reference to the Playing Pitch Strategy (as updated) as it relates to understanding demand for participation now and in the future.</i> <i>Under c), we would recommend that the wording is amended to make clear that in demonstrating that a facility is surplus to requirements this is subject to a robust assessment of need.</i> <i>Sport England has a concern about paragraph 4.523 which suggests that should the disposal of the educational playing field be approved by the SoS, in accordance with Section 77 of the Schools Standards and Framework Act 1998, then an exception to the policy may be made where there is provision of equivalent or greater community benefits. Sport England's playing fields policy and paragraph 104 of the NPPF would still apply in respect of any considerations about the loss of playing field. The benefits to sport from any such loss would need to be demonstrated in accordance with our playing fields policy and paragraph 104 of the NPPF.</i>	In response to further comments: - A reference to the <i>Playing Pitch Strategy</i> is already included in the supporting text (Paragraph 4.533) - Criterion (c) already presents a requirement for developments to demonstrate that a facility is surplus in case of a loss of sport facility. In regard to paragraph 4.542 (previously 4.523), the wording has been amended as follows: <i>"4.542 Where development affects school playing field land, and in the circumstances where the Education Authority has received consent or approval for the loss of surplus school playing fields from the Secretary of State for Education under Section 77 of the School Standards and Framework Act 1998, an exception may be made to this policy where equivalent or greater community benefits are provided and where the proposal still complies with the NPPF and, where relevant, Sport England's Playing Fields Policy and Guidance. Applicants will still need to demonstrate that the loss of any playing field land is justified in planning terms, including by reference to the wider sporting and community need for playing field provision and the benefits to sport and recreation arising from the proposal."</i>
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2. Allocations:

Sport England Comment	HBC Response/ Action
Allocation 7: Former Oak Park School Sport England is unclear whether the site benefitted from a playing field ancillary to the school. If so, Sport England would wish to object to the loss of playing field land at the site without suitable replacement in accordance with our playing fields policy and paragraph 104 of the NPPF.	The Council clarified with Sport England (SE) that the school on the site was demolished, and the site has been vacant for many years. SE confirmed that on this basis they have no objection to the site allocation.