Statement of Common Ground

South Downs National Park Authority &

Havant Borough Council

November 2026





1. Introduction

1.1. This Statement of Common Ground (SCG) is a jointly agreed statement between the South Downs National Park Authority (SDNPA) and Havant Borough Council (HBC). It sets out the position and understanding with respect to key cross boundary strategic issues between the two authorities. It is not binding on either party but sets out a clear and positive direction to inform ongoing strategy and plan making. It should be noted that this is a bilateral agreement between these two authorities only.

1.2. Both SDNPA and HBC intend to submit their emerging Local Plans as legacy plans, to be examined under the 2024 National Planning Policy Framework (NPPF). For a Local Plan to be found sound under the 2024 NPPF it needs to be justified' and thus 'based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.'

1.3. The Levelling-up and Regeneration Act 2023 (Commencement No11 and Saving and Transitional Provisions) Regulations 2026 saves relevant parts of the legacy plan-making system to allow Local Plans submitted for examination by 31 December 2026 to progress to adoption under that system. This deadline has now been extended to 31st March 2027. The Regulations above did not save the previous 'duty to cooperate' as a legal test. This duty therefore no longer applies to Local Plans being prepared under the legacy or new plan-making system. However, in order for a Local Plan to be found sound under the 2024 NPPF it needs to be positively prepared, justified, effective and consistent with national policy. This requires effective joint working with relevant bodies on strategic matters as evidenced by statements of common ground. A new NPPF was published on 17 August 2026 and is a material planning consideration. However, under the transitional arrangements in Annex A (8) of the 2026 NPPF, the South Downs Local Plan and Havant Borough Building a Better Future Plan will be examined under the December 2024 NPPF.

1.4. This SCG has been prepared in parallel with both the Publication Havant Borough Building a Better Future Plan and the Proposed Submission South Downs Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012). SDNPA and HBC agree on the importance of continuing to work on strategic cross boundary issues in line with national policy.

2. Strategic Geography

2.1. A map of the two authority areas is set out in figure 1. The South Downs National Park adjoins the northern part of the Borough at Emsworth Common Road.

2.2. The South Downs National Park stretches along the south coast of England from Eastbourne to the east and culminating in Winchester to the west. It is the most populated of the UK's National Parks, with 113,000 residents and 2.2 million people living within 10 kilometres of its boundary. The South Downs National Park is mainly rural in nature though there are some areas which are more urban in character notably the large towns of Petersfield and Lewes. The statutory purposes and duty for national parks as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 are:

Purposes

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

Duty

- To seek to foster the economic and social well-being of the local communities living within the National Park.

2.3. Section 245 of the Levelling Up and Regeneration Act 2023 amends section 11A of the 1949 Act to require 'relevant authorities' (which include Havant Borough Council and the South Downs National Park Authority) to seek to further the purposes of the National Park.

2.4. The Borough of Havant is located on the coastal plain between the South Downs and the Solent. The authority area comprises approximately 55 square kilometres with a population of 132,006. The borough is made up of five sub areas namely Emsworth, Havant, Hayling Island, Leigh Park and Waterlooville.

2.5. Havant Borough is mainly urban in nature though there are some areas which are more rural in character, notably that of Hayling Island. The Borough has little growth potential and significant constraints affecting potential development sites. Chichester Harbour National Landscape encompasses the eastern edges of Hayling Island and the southern part of Emsworth.

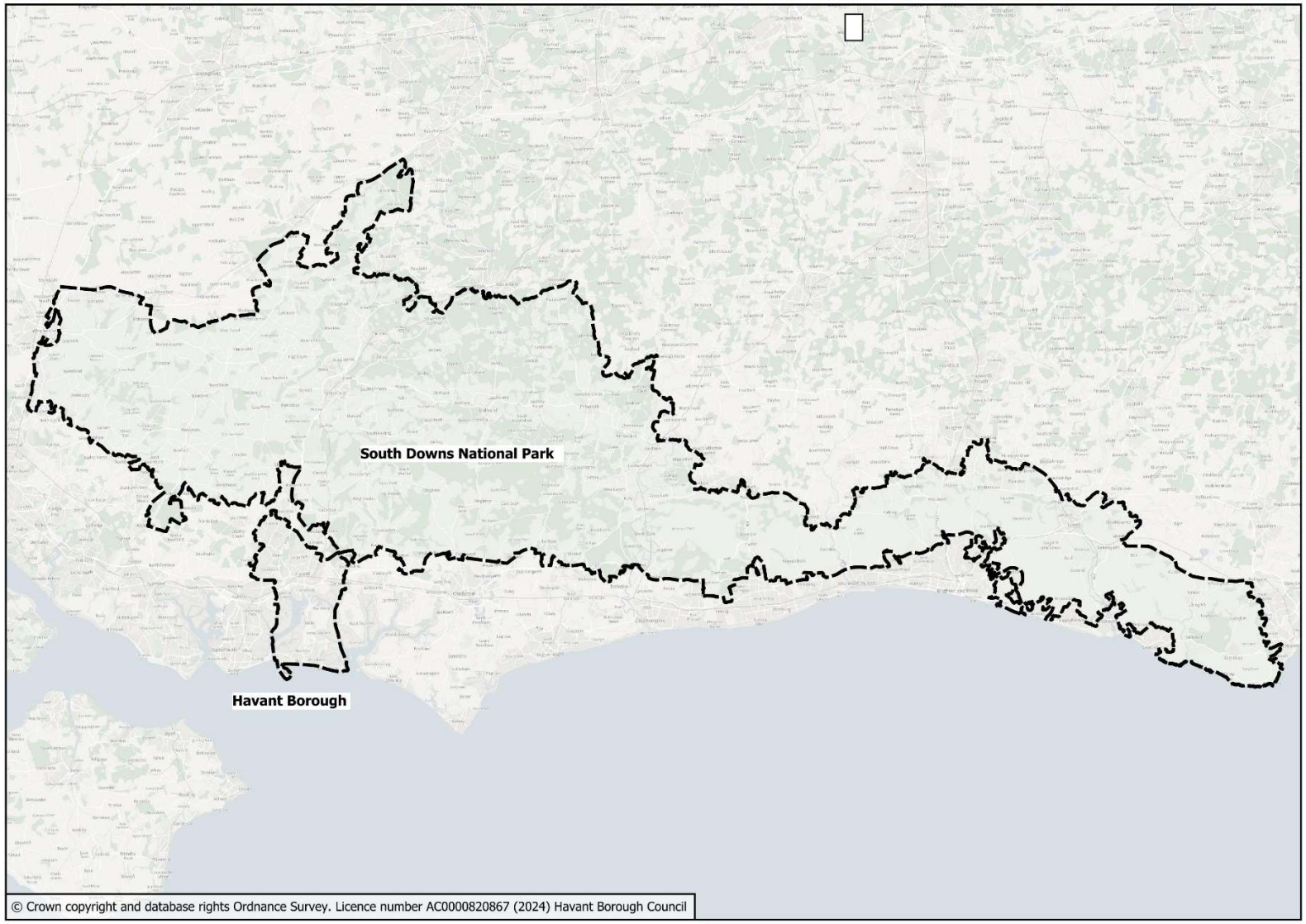

Figure 1: Map of South Downs National Park Authority and Havant Borough

3. Key Cross boundary Strategic Matters

3.1. This section sets out where agreement has been reached on cross-border strategic matters, or where further work to reach common ground is required. This has been informed by the SDNPA's strategic cross-boundary priorities:

1) Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park and its setting.
2) Biodiversity restoration at all scales and making nature bigger, better and more joined up.
3) Protection and mitigation of impacts on European designated nature sites including nutrient neutrality.
4) Mitigation and adaptation to climate change, including nature-based solutions.
5) Sustainable travel into, within and across the National Park.
6) The local economy and jobs particularly in land management and the visitor economy.
7) New homes including accommodation for Travellers, focusing on affordable homes for local communities.
8) Green and grey infrastructure serving communities in and around the National Park.

Housing

<u>South Downs National Park Authority's Position</u>

3.2. The South Downs National Park Authority consulted on its Regulation 19 (Proposed Submission) between May and June 2026. The Local Plan will cover the period from 2024 to 2042.

3.3. In November 2025, the SDNPA notified HBC of two studies on housing need which 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. These include two studies as follows:

- The AECOM study which 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 the 2023 Housing and Economic Development Needs Assessment, produced by Iceni which provides an alternative approach to housing needs based on principles agreed by the 10 English National Parks and the Broads. This Addendum indicates that an appropriate housing need figure of 323 homes per year (or 6,137 new homes between 2024 and 2042).

3.4. Planning Practice Guidance allows National Park Authorities to use a locally derived method to establish their housing needs, and the SDNPA considers that 323 homes per year is the most appropriate figure for housing needs in the National Park, and is the housing figure reflected in the Proposed Submission Local Plan.

3.5. The Authority has considered all known potential development sites through the Land Availability Assessment and is proposing to allocate all those sites found to be suitable, achievable and available for housing development. This has resulted in a housing provision figure based on the landscape capacity of the National Park to accommodate development without conflicting with its statutory purposes. On this basis, the Authority anticipates that they will be able to meet a housing figure of 323 homes per year with around 10% headroom.

3.6. In the event that the Planning Inspectorate prefers the AECOM method for calculating housing need, the SDNPA formally requested HBC accommodate the unmet housing need of the National Park. The overall unmet need figure is estimated to be approximately 700 homes per year. 292 of these are in the Central Hampshire Housing Market Area and 533 in the Coastal Sussex Housing Market Area (the two closest HMAs to Havant).

Havant Borough Council's Position

3.7. HBC consulted on a regulation 19 Local Plan consultation between July and September 2026, aiming for submission in Q4 2026. The Local Plan will cover the period from 2022 to 2043.

3.8. The standard method sets a housing need for 879 dwellings per annum for Havant Borough. This equates to 15,822 dwellings over the remainder of the plan period. This level of housing need is significantly challenging to deliver within Havant Borough where land supply is significantly constrained. The Borough is heavily built-up with only limited land outside of the existing urban area remaining available for development. Much of that remaining land is subject to a range of constraints including international and national nature conservation designations, the 'national landscape' designation around Chichester Harbour, and significant areas at risk of flooding. Havant Borough is located within the Portsmouth-focused Housing Market Area as defined in the Strategic Housing Market Assessment of 2014[1], within which there is a collective unmet housing need of 16,408 homes as of 31 March 2026 (arising out of Gosport Borough, Havant Borough and Portsmouth City).

3.9. The Publication Local Plan sets out a capacity-based housing requirement, based on the maximum level of housing that can be delivered having regard to identified constraints and limited land availability. The Strategic Housing and Economic Land Availability Assessment includes a comprehensive and robust assessment of land to ensure the Council has fully examined all opportunities for development.

[1] https://www.push.gov.uk/wp-content/uploads/2018/06/SHMA-2014-1.pdf

3.10. The housing requirement in the Publication Local Plan is for at least 7,087 net new homes across the plan period, averaging 337 dwellings per annum. As of 1 April 2025, there remains a supply of 5,908[2] new dwellings to be delivered by the Plan. This would result in an unmet housing need figure of 9,914 dwellings. However, with an unmet need allowance of 345 dwellings from the adopted Winchester District Local Plan 2020-2040 this reduces Havant Borough's unmet need to 9,569 dwellings. Given the scale of unmet housing need that exists, in addition to engaging with its neighbouring authorities, the Borough has also engaged with other authorities in the Hampshire and the Solent Combined County Authority area. The Council's Statement of Cooperation documents this and shows that despite its best efforts it has not been possible to secure any further commitments towards unmet housing need at this time.

Agreed Position

3.11. The two authorities are satisfied that each other are leaving no stone unturned to meet their own housing need. The respective positions on housing need and supply are noted, and it is agreed that neither authority can assist the other with accommodating unmet need.

Employment

3.12. The table below sets out the respective employment land supply positions of the two authorities as of November 2026.

LPA	Plan period	Employment need (sqm)	Employment supply (sqm)	Surplus/unmet need (sqm)
South Downs National Park Authority	2024-2042 (19 years)	56,000	72,125	16,125
Havant Borough Council	2022-2043 (20 years)	146,213	148,930	+2,717

Table 2: Employment Land Position - March 2026

South Downs National Park Authority's Position

3.13. The employment needs for the National Park are set out in the Housing and Economic Development Needs Assessment Addendum 2026 and amount to 56,000 sqm (B2/B8 E(g) floorspace). Employment supply is set out in the Employment Land Review 2026. There are existing commitments of 72,125 sqm and the Addendum concludes that it is likely that overall need, particularly industrial, will be met through the existing and pipeline supply. However, this supply mostly comprises industrial and mixed office and industrial with a net loss of 10,194 sqm

[2] Excluding 1,179 completions which took place during 2022/23 to 2024/25

solely office space. To address the imbalance, policy SDE1 in the Proposed Submission Local Plan facilitates the change of use from industrial to office use.

Havant Borough Council's Position

3.14. The Council's Employment Land Review 2024 and ELR Addendum 2026 provide an up-to-date assessment of economic and employment development needs. The ELR Addendum identifies an objectively assessed need figure of 146,213 sq. m of net new floorspace between 2022 and 2043, which can be met by a small margin.

3.15. However, there is a lack of office sites promoted for development. The ELR notes that the office market has been challenging for a number of years and that developers are unwilling to invest speculatively in securing land allocations when they do not see a reasonable short-term development opportunity. Due to the lack of available sites for office development in the Borough, the ELR acknowledges that it may be better to work with neighbouring authorities, particularly Portsmouth City Council to address office need.

3.16. PCC originally agreed to provide a total of 31,261 sqm of employment floor space towards HBC's unmet employment needs. However, updated monitoring data resulted in a decreased surplus of employment floorspace, which is set out in the Main Modifications3 to the Portsmouth's Local Plan. The updated surplus of employment floorspace is 22,743 sqm, which is entirely office floorspace. This contribution from Portsmouth reduces Havant Borough's unmet need for office demand under the high end growth scenario to 12,515 sqm; this has been calculated by subtracting 22,743 sqm from unmet office need in Havant of 35,258 sqm. This is set out in HBC's Statement of Common Ground with Portsmouth4.

3.17. FBC has also confirmed there they are able to assist HBC with their unmet employment need and formally offered 19,973 sqm of floorspace towards Havant Borough's unmet employment need. This has been formalised as part of HBC's Statement of Common Ground with Fareham.

Agreed Position

3.18. Havant Borough does not have any unmet need, which is being addressed through transfers of employment land from PCC and FBC respectively. SDNPA not have any unmet employment need.

[3] https://www.portsmouth.gov.uk/sites/default/files/2026-09/FINAL_PLP_Main%20Mods%20V2.0.pdf

[4] Statement of Common Ground between Portsmouth City Council and Havant Borough Council (October 2026). Available at: https://www.havant.gov.uk/media/11320/download?inline

Gypsy and Traveller Provision

South Downs National Park Authority Position:

3.19. The SDNPA's most recent calculation of Gypsy and Traveller and Travelling Showpeople Accommodation is contained within a joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment December 2024. This concludes there is a need for 62 gypsy and traveller pitches and 11 travelling showpeople plots over the plan period to 2042. Four allocated pitches at Fern Farm, Greatham have been implemented since the GTAA was prepared, reducing the overall need during the plan period to 58 pitches.

3.20. 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. The Proposed Submission Local Plan proposes a supply of 21 gypsy and traveller pitches. Despite multiple and targeted calls for sites it has not been possible to identify any further suitable gypsy and traveller pitches or travelling showpeople plots. There is therefore an unmet need of 37 gypsy and traveller pitches and 11 travelling showpeople plots.

3.21. In November 2025, the SDNPA formally requested assistance from HBC in relation to unmet gypsy and traveller needs of the National Park.

Havant Borough Council Position:

3.22. Havant Borough's 2024 Gypsy and Traveller Accommodation Assessment (GTAA) and 2026 Addendum conclude that there is no identified unmet need for gypsy and traveller pitches or travelling showpeople plots within Havant Borough. Though the 2017 joint GTAA did identify that Havant Borough had a need to provide 1 pitch, this need has now been met through a permission for 2 pitches at a site in Long Copse Lane in northern Emsworth. The Publication Local Plan proposes to safeguard this site for current need. It is noted that SDNPA's representation to the Regulation 18 Local Plan supported this position.

3.23. HBC responded to SDNPA's formal request for assistance in November 2025. This confirmed that Havant Borough is significantly constrained, with limited land available for development. As Havant Borough is unable to meet its own general housing need, it is unable to assist with the unmet gypsy and traveller needs arising from the National Park.

Agreed Position

3.24. Havant Borough does not have any unmet need for gypsy and traveller pitches or travelling showpeople plots. However, its significant constraints affect its ability to meet its own development needs and the unmet needs from neighbouring areas, including for gypsies and travellers.

3.25. Both Councils agree to liaise on gypsies and traveller accommodation and explore opportunities to deliver gypsy and traveller pitches.

HBC site allocations within the setting of the National Park

Agreed Position

3.26. The Havant Borough Building a Better Future Plan proposes the allocation of Southleigh (Allocation 1) and Long Copse Lane (Allocation 2) which are within the setting of the South Downs National Park. Both authorities are committed to bringing these sites forward in a way which avoids or minimises any potential adverse impacts on the South Downs National Park as per NPPF paragraph 189.

SDNPA's Regulation 19 representations to the Havant Borough Regulation 19 Building a Better Future consultation

Agreed Position

3.27. In September 2026, the SDNPA made Regulation 19 representations to the Publication Building a Better a Future Plan which proposed a number of changes but did not raise any matters of soundness or legal compliance. SDNPA and HBC have since informally agreed proposed modifications which will submitted alongside the Plan for examination. There are no remaining areas of disagreement.

4. Signatories

4.1 Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

4.2 Both parties agree that they have engaged positively on an ongoing basis both bilaterally.

4.3 Both parties agree that there are no areas of disagreement between the parties relating to the emerging Publication Havant Borough Building a Better Future Plan and the Proposed Submission South Downs Local Plan and will both continue to work proactively on the key strategic cross boundary issues identified in this SCG.

Signed:	Signed:
Tim Slaney	David Hayward
Name: Tim Slaney	Name: David Hayward
Position: Director of Placemaking	Position: Strategic Planning Manager
South Downs National Park Authority	Havant Borough Council
Date: 17/11/2026	Date: 17/11/2026