Statement of Common Ground

South Downs National Park Authority &

Havant Borough Council

March/April 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.' It is noted that the consultation draft NPPF published in December 2025 changes the tests of soundness. However, the wording of the new test of 'realistic' is identical to the 2024 definition of 'justified'.

1.3. The Written Ministerial Statement (WMS) made in November 2025 notes that the new plan-making system provided by the Levelling-Up and Regeneration Act 2023 does not include the Duty to Cooperate. Instead, the new system will rely on revised national policy and the new tier of strategic planning to ensure effective co-operation between plan-making authorities. It also notes that the Regulations for the new system will ‘save’ the current plan-making system for a period to allow emerging plans, such as the SDNPA and Havant Local Plans, to progress to examination by 31 December 2026.

1.4. The Government has now published the regulations to implement the new plan making system, provided by the Levelling-Up and Regeneration Act 2023. As part of these regulations, the Duty to Cooperate is not saved. However, the WMS confirmed that local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and that Planning Inspectors will continue to examine plans in line with the policies in the NPPF on ‘maintaining effective co-operation’.

1.5. 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 both existing and draft 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.

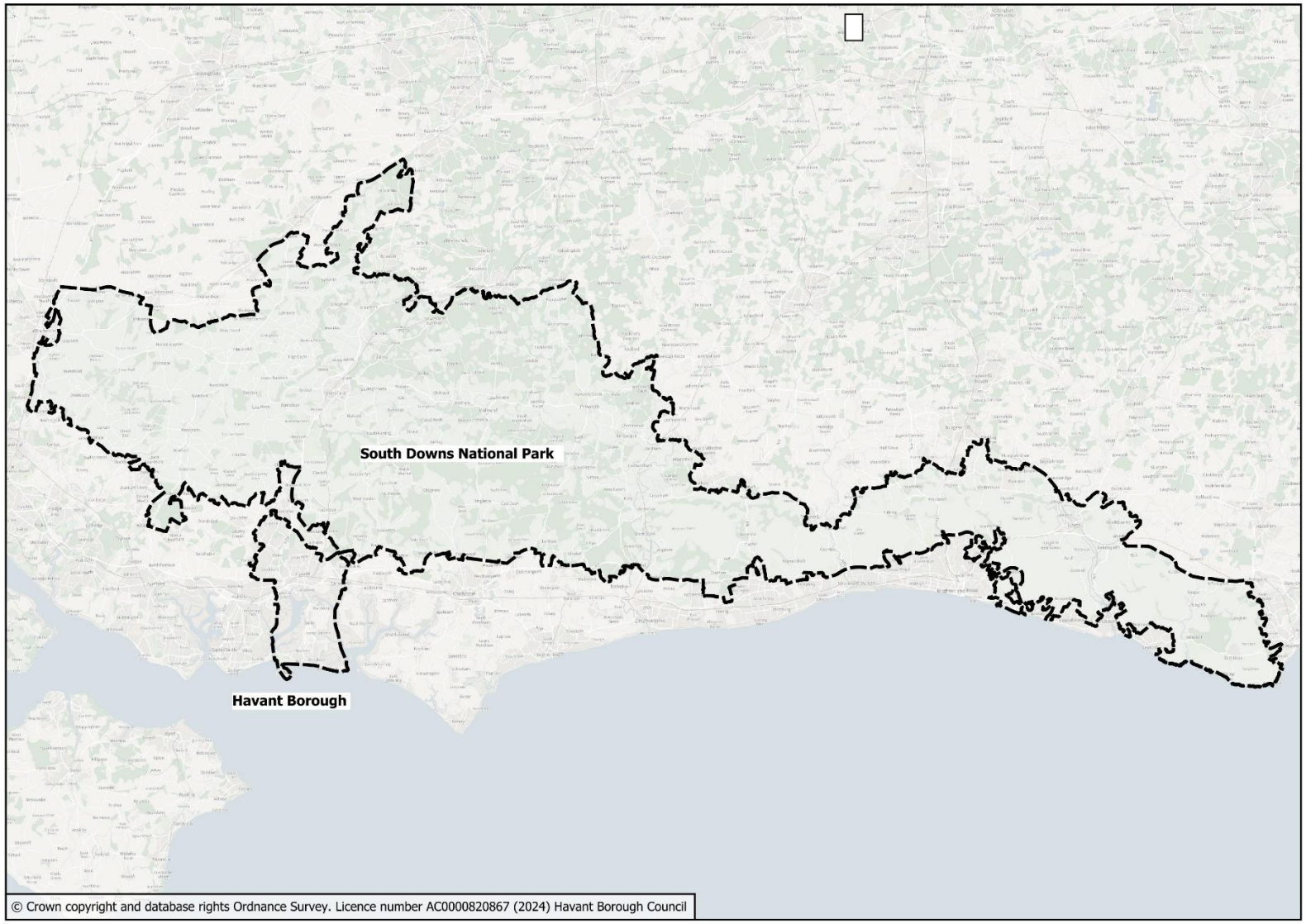

Figure 1: Map of South Downs National Park Authority and Havant Borough

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

South Downs National Park Authority's Position

3.2. The South Downs National Park Authority will be out to consultation on its Regulation 19 (Proposed Submission) version of its Local Plan to be undertaken from May to 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 is currently working towards a regulation 19 Local Plan consultation in Q3 2026, aiming for submission in Q4 2026. This follows consultation on a Regulation 18 Draft Local Plan in
2025.

3.8. The standard method sets a housing need for 892 dwellings per annum for Havant Borough. This equates to 17,840 dwellings over 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 18,437 homes as of April 2025 (arising out of Gosport Borough, Havant Borough and Portsmouth City).

3.9. The Draft 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. This was informed by a comprehensive review of the Borough's housing land supply to inform the Regulation 18 Local Plan.

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

3.10. The proposed housing requirement in the Draft Local Plan is for at least 7,218 net new homes across the plan period, equivalent to 361 dwellings per annum. As a result, there is an unmet need arising from Havant Borough of 10,622 homes, equivalent to 531 dwellings per annum (2023 – 2043). Nevertheless, the Council has sought to 'leave no stone unturned' in identifying all sources of potential housing supply. Whilst the precise unmet need arising from Havant Borough will evolve as the local plan is finalised and housing completions figures are released for future years; this is unlikely to materially alter the level of unmet need.

3.11. The Borough Council wrote to its immediate neighbours (Chichester District Council, East Hampshire District Council, Portsmouth City Council, the South Downs National Park Authority, and Winchester City Council), and other authorities (Fareham Borough Council and Gosport Borough Council) falling within the same Housing Market Area (HMA) to ascertain if they are able to accommodate its unmet need. In formally requesting assistance with unmet housing need from the SDNPA, HBC acknowledged paragraph 189 of the 2024 NPPF which 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 these designated areas should be limited.

3.12. Winchester City Council has agreed to provide 70% of its unmet housing need allowance to Havant through a joint agreement with Havant, Portsmouth and Winchester Council's (the exact number this equates to is being confirmed through the Winchester City Council examination).

Agreed Position

3.13. 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

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

LPA	Plan period	Employment need	Employment supply	Surplus/unmet need
South Downs National Park Authority	2024-2042 (19 years)	73,600	134,125[2]	+60,525
Havant Borough Council	2023-2043 (20 years)	175,199	123,755	-51,424

[2] Includes 62,000m^2 at Shoreham Cement Works

Table 2: Employment Land Position - March 2026

South Downs National Park Authority's Position

3.15. The employment needs for the National Park are set out in the Housing and Economic Development needs Assessment 2023 and amount to 73,600 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 – amounting to only a marginal overall deficit of 1,475 sqm. However, this supply mostly comprises industrial and mixed office and industrial with a net loss of 10,194 sqm 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. Additional significant capacity of 62,000 sqm is available at Shoreham Cement Works but this is not likely to come forward until the end of the plan period due to the complexity of this site.

Havant Borough Council's Position

3.16. HBC published an Employment Land Review in December 2024 which provides an up-to-date assessment of economic and employment development needs. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace between 2023 and 2043 of which 123,140 sq. m results from industrial demand and 36,059 sq. m results from office demand.

3.17. There is an estimated supply of 123,775 sq. m of employment supply which means there is an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

3.18. In June 2025, HBC formally requested assistance from all neighbouring authorities, including EHDC with its unmet employment need. PCC subsequently indicated that they have an oversupply of 31,261 m2 of office floorspace and has agreed to allocate this to HBC. This has been formalised in a bilateral SCG between the two authorities.

3.19. Following work to collectively establish unmet need in South East Hampshire, FBC have confirmed they are able to assist HBC with their remaining unmet employment need of 19,973 m2. Furthermore, HBC are undertaking an Addendum to the Employment Land Review to recalculate the employment need for the Borough over the plan period so that the assessment of need has been updated no more than two years before the submission date and to understand whether previously identified lower-ranked potential employment sites which have failed to progress could be considered for housing. FBC confirmed that they are happy to consider providing further employment floorspace to HBC in regard to these sites and HBC are in the process of finalising the evidence. This will all be confirmed through a bilateral SCG between the two authorities.

Agreed Position

3.20. Havant Borough does not have any unmet need, which is being addressed through transfers of employment land from PCC and FBC respectively. SDNPA is not looking towards HBC to accommodate any unmet need.

Gypsy and Traveller Provision

South Downs National Park Authority Position:

3.21. 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.

3.22. 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.

3.23. 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:

3.24. Havant Borough's 2024 Gypsy and Traveller Accommodation Assessment (GTAA) concludes 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 Draft 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.

3.25. 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

3.26. 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.

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

Proposed site allocations within the setting of the National Park

Agreed Position

3.28. 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.

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:
[redacted]	[redacted]
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Position: Director of Placemaking	Position: Strategic Planning Manager
South Downs National Park Authority	Havant Borough Council
Date: 01/04/2026	Date: 24/03/2026