Statement of Common Ground

Portsmouth City Council & Sport England

November 2026

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Introduction

What is a Statement of Common Ground?

This Statement of Common Ground (SCG) is a jointly agreed statement between Portsmouth City Council (PCC) and Sport England (SE). It sets out the position and understanding with respect to key strategic issues between the City Council and SE. 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 organisations only.

This SCG has been prepared in accordance with paragraphs 24 to 28 of the National Planning Policy Framework (NPPF December 2024) and the section of the Planning Practice Guidance on Maintaining Effective Cooperation. It has also followed guidance prepared by the Planning Advisory Service (PAS). It has been prepared in parallel with the Pre-Submission Local Plan (Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) and updated during the Local Plan Examination. This Plan, upon adoption, will supersede the existing Portsmouth Local Plan (2012). The new Local Plan will cover the period to 2040 and sets out the vision, objectives and policies to guide future development in the City over the plan period.

Relation between Portsmouth City Council and Sport England

PCC is the Local Planning Authority responsible for the preparation of the Local Plan for the City. Sport England is a statutory consultee that plays an active role in the planning system. Sport England's primary and statutory role in the planning system is to protect playing field land. In this role, Sport England help to shape national, strategic and local planning policy and development plan documents, along with the design and masterplanning of large-scale developments and responding to planning application consultations.

Sport England also helps local authorities to develop their evidence base so the needs of people in their area for sporting provision, and ensure that the needs arising from new development, are understood and can be met.

In respect of this Local Plan and Statement of Common Ground, Sport England are looking to ensure The Local Plan and its supporting evidence base are robust and positive towards sport and physical activity and are based on robust and up-to-date assessments of need and strategies to meet the needs (for example playing pitch and built facility strategies).

Key Strategic Matters - Timing of the update to the Playing Pitch Strategy for Portsmouth

The last Portsmouth Playing Pitch Strategy (PPS)[1] was published in 2018 and ran until 2021, however future demand was taken into account until 2034. Sport England recommends that Councils regularly review and update their PPS. The City Council has been considering the appropriate timing for an update to the Strategy. The City Council has been undertaking

[1] https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Final_playing_pitches_strategy_2018.pdf

significant sports development since the 2018 strategy was published, most notably the King George V Playing fields in Cosham and Moneyfields[2] in Baffins.

Sport England recommends that the City Council looks to undertake a new Playing Pitch Strategy as its current strategy is more than five years old. The City Council plan to undertake an update to its Playing Pitch Strategy that takes account of these recent developments and the improved provision they provide as part of its assessment.

In consultation with Sport England, the Council has prepared a 'Request for Quotation' in order to procure a new assessment of sports provision in the City. The procurement is being undertaken via the Sport England Active Environments Framework. The commission will deliver the following, covering the period up to 2045:

- A Playing Pitch Strategy
- A Built Facilities Strategy
- An Integrated Sports Infrastructure Investment and Delivery Plan.

Submissions must be returned by 27 November 2026 and the award decision will be announced by the City Council on 7 December 2026. This will allow for commencement in early 2027. Portsmouth City Council and Sport England agree that this would be a suitable timetable for commencing the new assessments. Sport England are satisfied that this is appropriate and will allow for the new provision at King George V and Moneyfields to be included as part of the updated Strategy.

Key Strategic Matters - Representations from Sport England to the Regulation 19 Local Plan Consultation.

Sport England made three representations in respect of the policies in the Regulation 19 Local Plan (in addition to a fourth representation relating to the review of the Playing Pitch Strategy as outlined in section 3) through the Pre-Submission consultation on the Plan. Each of these has been addressed in turn in this section with Sport England's position set out and Portsmouth City Council's (PCC's) position / response detailed.

PLP8 - St James' & Langstone Campus

In respect of Policy PLP8 Sport England notes that the current wording of policy 3(b) as proposed states that, "the Development must retain where possible, playing pitches and fields". Sport England considers that this is inconsistent with paragraph 104 of the NPPF, since it weakens national policy protection for playing field/pitches by suggesting that it is optional to retain the playing field/pitches on the site. PCC agree to the deletion of “where possible” and propose the deletion as a Main Modification. This is no longer a point of disagreement.

PLP45 - Open Space requirements for new development

In respect of Policy PLP45 of the Local Plan, Sport England raised an objection to the policy as drafted as they felt the wording of criterion 2(d) allows for the loss of sports facilities and playing fields where wider public and non-sporting benefits can be demonstrated. Sport England considers that this is inconsistent with paragraph 104 of the NPPF. PCC agrees that criterion (d) is inconsistent with paragraph 104 of the NPPF and have proposed a deletion through a Main Modification. This is no longer a point of disagreement.

[2] https://publicaccess.portsmouth.gov.uk/online-applications/applicationDetails.do?keyVal=P2G1QXMOKDW00&activeTab=summary

PLP52 - New & Existing Community & Leisure Facilities

In respect of Policy PLP 52, Sport England noted that the proposed policy is intended to apply to sports facilities including leisure centres, sports pavilions, swimming pools and gyms. Sport England is concerned that the policy weakens protection given to these facilities in paragraph 103 of the NPPF as national planning policy does not make the distinction between community and commercially run facilities. Sport England state that paragraph 103 makes clear the exceptional and specific circumstances under which sports facilities can be lost. These circumstances do not include reasons to do with viability or rather lack of viability. PCC's position is that the distinction between commercially run, and community run operators is pragmatic and reflects that commercially run operators need to be viable and therefore is appropriate to include in Policy PLP52. PCC and Sport England recognise that this remains as a point of disagreement.

Signatories

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

Both parties agree that they have engaged positively on an ongoing basis and that on this basis the Duty to Cooperate has been met.

Both parties are satisfied that agreement has been reached in respect of the new Playing Pitch Strategy, Built Sports Facilities Strategy and Sports Infrastructure Investment and Delivery Plan.

	Signed: 	Signed: Owen Neal
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	Position: Head of Planning Policy	Position: Planning Manager
	Portsmouth City Council	Sport England
	Date: 10-11-26	Date: 10-11-26