

Statement of Common Ground

Portsmouth City Council & South Downs National Park Authority

February 2026



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1. Introduction

What is a Statement of Common Ground?

1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Portsmouth City Council (PCC) and the South Downs National Park Authority (SDNPA). 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.

National Policy Context

1.2 Both PCC and the SDNPA intend to submit their emerging Local Plans under the transitional arrangements for Local Plans set out in Annex 1 of the 2024 National Planning Policy Framework¹ (NPPF). In order 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 2025² 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 Statement³ 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 Portsmouth and South Downs Local Plans, to progress to examination by 31 December 2026.

1.4 The Statement sets out that the Government has decided not to 'save' the Duty. However, it goes on to say 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 https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

²

https://assets.publishing.service.gov.uk/media/6941965758a21370f58f304e/Draft_NPPF_December_2025.pdf

³ <https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104#:~:text=Statement%20made%20on%2027%20November,Statement%20made%20by&text=Duty%20to%20Cooperate,plan%20making%20system%20provided%20by%20the>

1.5 PCC and the SDNPA agree on the importance of continuing to work on strategic cross boundary issues in line with both existing and draft national policy.

What does this document include?

1.6 Section 2 outlines the strategic geography of Portsmouth City and the South Downs National Park.

1.7 Section 3 sets out the key cross boundary strategic issues addressed by this SCG with an agreed position between the two Authorities on each issue.

2. Strategic Geography

2.1 Portsmouth City lies adjacent to the Solent on the southern coast of England. The majority of the City's landmass is on Portsea Island and therefore it has a unique geographic location and relationship to the sea. The City covers 40.1 square kilometres and is home to approximately 219,000 people, with a population density higher than some parts of London.

2.2 The South Downs National Park is England's newest national park (established 2010), covering 1,627sq km from Winchester to Eastbourne. The South Downs National Park Authority is the local planning authority for the National Park.

2.3 The National Park lies to the north of Portsmouth separated from the City by parts of East Hampshire District, Havant Borough and Winchester District.

2.4 Portsmouth is constrained in terms of geographical area, with the Solent to the south, the large natural Harbours and the close proximity of the adjoining boroughs and districts to the north. This limits the space for potential development in the City largely to brownfield land. Most of the brownfield sites in the City have significant constraints such as contamination, historic structures and complicated ownership.

2.5 The SDNP is mainly rural in nature though there are some areas which are more urban in character notably the 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.

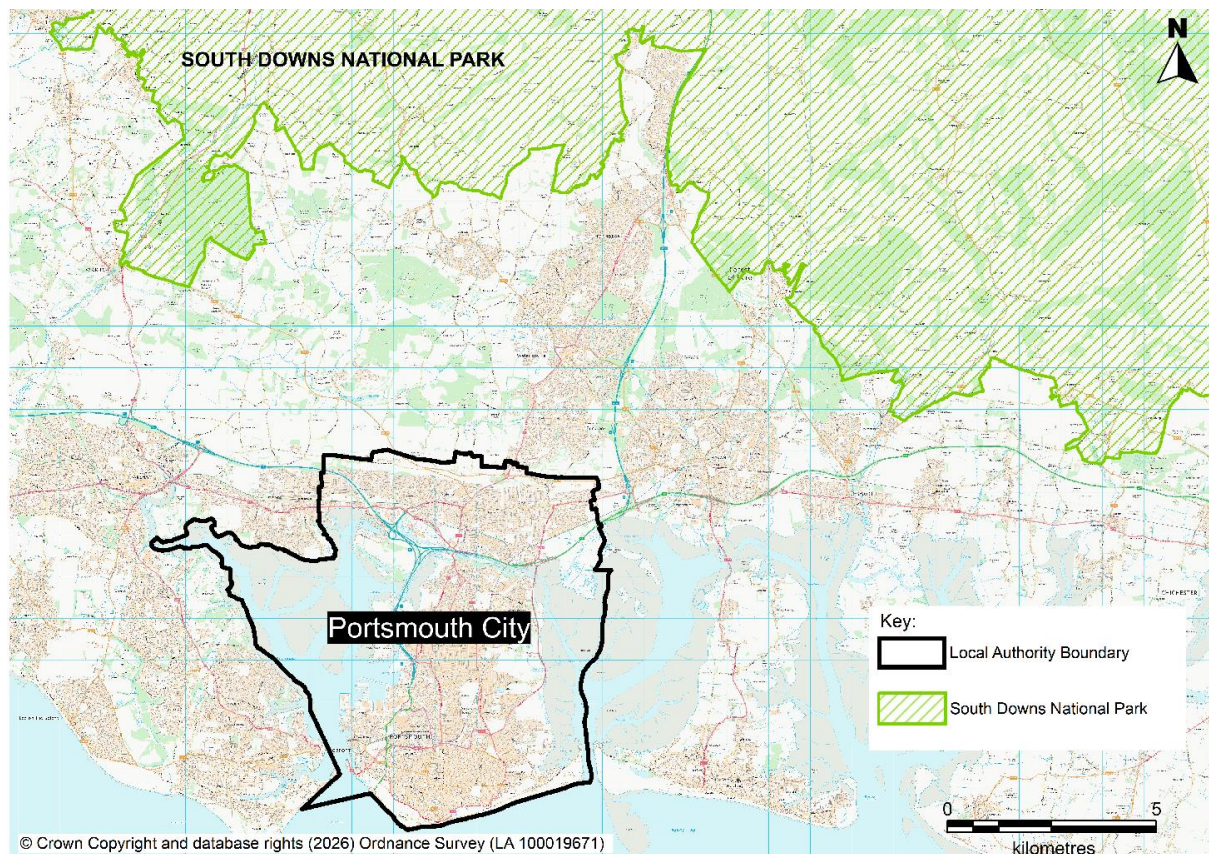
To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

Duty

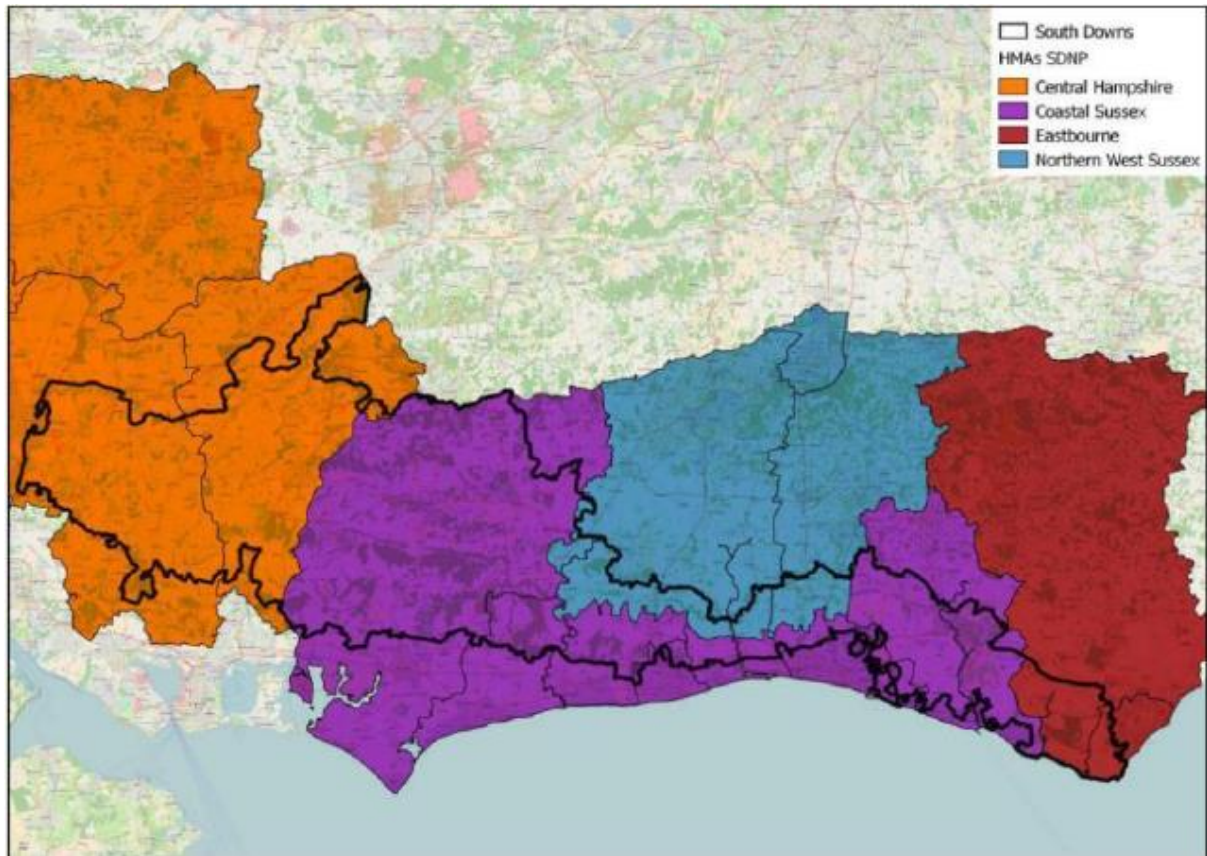
To seek to foster the economic and social well-being of the local communities living within the National Park.

Section 245 of the Levelling Up and Regeneration Act 2023 amends section 11A of the 1949 Act to require 'relevant authorities' (which include Portsmouth City Council and SDNPA) to seek to further the purposes of the National Park.

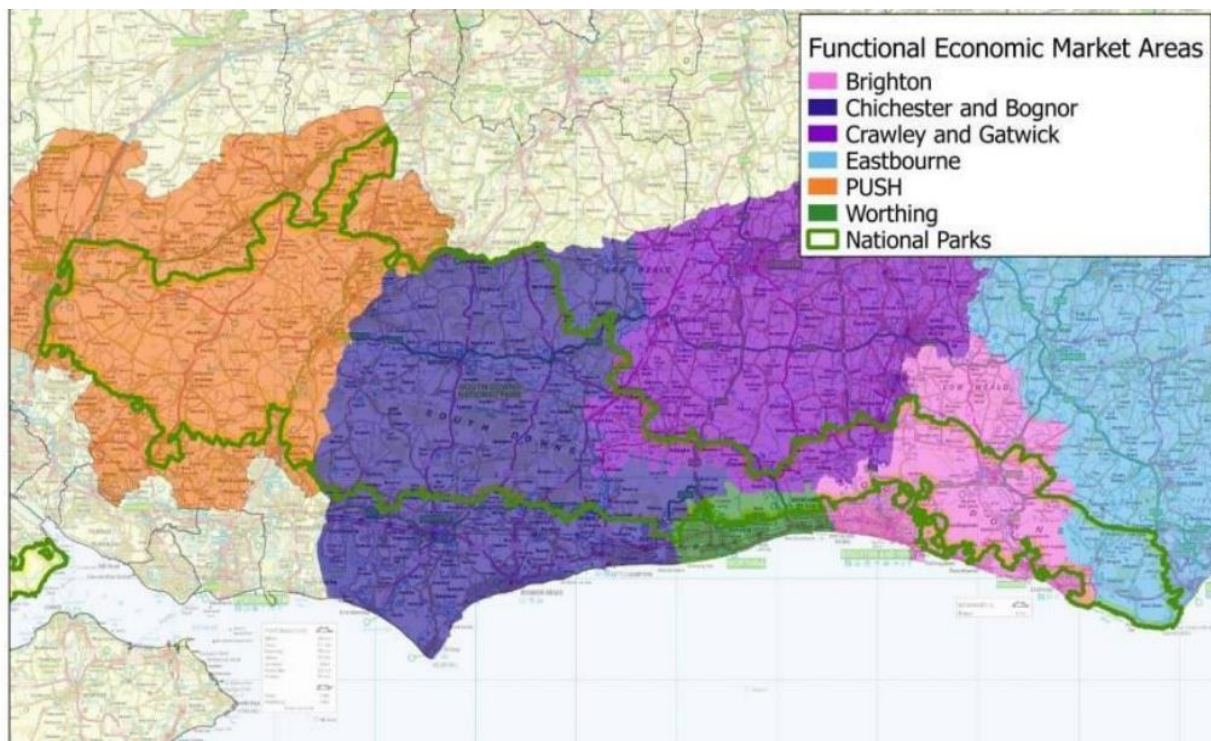
2.6 Portsmouth falls entirely within the Portsmouth Housing Market Area (HMA) and Functional Economic Market Area (FEMA), whilst the SDNP covers several HMAs and FEMAs across its length as shown on Maps 2 and 3.



Map 1: Map of Portsmouth City and the South Downs National Park



Map 2: Housing Market Areas covering the South Downs National Park



Map 3: Functional Economic Market Areas covering the South Downs National Park

2.7 This geography informs the shared issues faced by the City Council and National Park Authority in planning for their futures. Finding new land for housing and employment is important to both authorities, which face differing constraints but a shared need to provide for their residents.

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.

Housing

3.2 The table below sets out the respective housing land supply positions of the two authorities as of January 2026:

LPA	Plan period		Housing need according to the standard method	Housing supply	Unmet need
South Downs National Park Authority	2024-2042 (19 years)	Total	6,137 ⁴	6735	0
		Dwellings per annum	323	354	0 ⁵
Portsmouth City Council	2025-2040 (15 years)	Total	15,285	11,369	-3,916
		Dwellings per annum	1,019	758	-261

Table 1: Housing Land Position - January 2026

3.3 Portsmouth City Council has recently consulted on its Pre-Submission Local Plan Addendum (November 2025 to January 2026) and anticipates that its Local Plan will be submitted to the Secretary of State for examination in March 2026. The emerging Local Plan covers the period from 2025 to 2040.

3.4 Based upon the assessment carried out through the Housing and Economic Land Availability Assessment (HELAA) the Portsmouth Local Plan has set a housing target for Portsmouth of 15,285 new homes from 2025 to 2040 or approximately 758 new homes per year. This figure is a 'capacity-based' target based on the level of housing that can be realistically achieved within the plan period having regard to Portsmouth's constraints, land availability and development capacity. Nevertheless,

⁴ Locally derived housing need (AECOM standard method need 19,912)

⁵ 13,152 (692dpa) against AECOM disaggregated standard method.

the Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply, whilst being pragmatic in its assessment of delivery from permitted sites and HELAA sites.

3.5 The City Council has an unmet housing need of 3,916 dwellings against its housing need. The City Council has corresponded with its immediate neighbours and those in the South East Hampshire (Portsmouth) Housing Market Area (Chichester District Council, Gosport Borough Council, Havant Borough Council, Fareham Borough Council, East Hampshire District Council, South Downs National Park Authority and Winchester City Council) to ascertain if they are able to accommodate its unmet need. Fareham Borough Council confirmed through its adopted Local Plan that it would accommodate 800 dwellings of the City's unmet need. Winchester City Council has agreed to provide 30% of its unmet housing need allowance to Portsmouth through a joint agreement with Havant, Portsmouth and Winchester Councils (the exact number this equates to is being confirmed through the Winchester City Council examination). The City Council is also working proactively with Gosport and Havant Borough Councils as part of the South East Hampshire group.

South Downs National Park Authority Position

3.6 The SDNPA consulted on its Regulation 18 Local Plan in early 2025 and is currently taking its draft Regulation 19 Local Plan through Committee processes for publication in May/June 2026. It intends to submit this Plan for examination in November 2026 under the 'legacy' plan-making system.

3.7 The South Downs was designated as a National Park in recognition of its exceptional natural beauty. The NPPF states that great weight should be given to conserving landscape and scenic beauty in national parks, which have the highest status of protection in relation to these matters along with National Landscapes and the Broads. Therefore, it is entirely appropriate to take a landscape-led approach to planning in the National Park, and the Local Plan seeks to address development needs in a way that supports the National Park's statutory purposes and duties.

3.8 Planning Practice Guidance allows National Park Authorities to use a locally derived method to establish their housing needs, and the evidence for this is set out in Icení's Housing and Economic Development Needs Assessment 2023⁶ and Addendum 2025⁷. This establishes a need figure of 323 dwellings per annum.

3.9 An alternative method of establishing housing needs has been explored in the AECOM report 2025 'Applying the Standard Method to the South Downs National

⁶ <https://www.southdowns.gov.uk/wp-content/uploads/2024/07/SDNP-Final-HEDNA.pdf>

⁷ <https://www.southdowns.gov.uk/wp-content/uploads/2025/11/SDNP-Draft-Report.-V2-Clean.pdf>

Park area and overlapping Local Authorities'⁸. This arrives at a housing need figure of 1,048 dwellings per annum – or 19,912 across the plan period.

3.10 Through a robust Land Availability Assessment process, the Authority has considered all known potential development sites. The draft Regulation 19 Local Plan proposes a housing supply figure of 6,735 dwellings, which exceeds the Iceni housing need figure and provides 598 homes headroom. This proposed supply is based on the landscape capacity of the National Park to accommodate development without conflicting with its statutory purposes and utilises all of the sites deemed to be suitable, available and achievable for residential development in the Land Availability Assessment.

3.11 In the event that the Planning Inspectorate prefers the AECOM method of establishing housing need, SDNPA has written to all of its constituent local authorities and 14 neighbouring LPAs, including Portsmouth City Council, asking for assistance with unmet needs (amounting to nearly 700dpa). No positive offers of assistance have yet been received, although discussions are ongoing.

Agreed Position

3.12 The City of Portsmouth is the centre of a wider Portsmouth HMA, which also encompasses the Boroughs of Gosport, Fareham and Havant, and the southern parishes of Winchester and East Hampshire Districts. The South Downs is covered by several HMA's along its length. The Portsmouth HMA borders the SDNPA to the north. The two authorities agree that they do not share an HMA, however, there is a shared travel to work area most notably between Portsmouth and Petersfield. The two authorities note the respective positions on housing need land supply. It is agreed that neither authority is in a position to assist the other with accommodating unmet need arising out of each Local Plan as they cannot meet their own need.

Employment

3.13 The table below sets out the respective employment land supply positions of the two authorities as of January 2026:

⁸ [https://www.southdowns.gov.uk/wp-content/uploads/2025/11/SDNP-Standard-Method-Apportionment-Final-Report-2025-10-10.pdf](https://www.southdowns.gov.uk/wp-content/uploads/2025/11/SDNP-Standard-Method-Appportionment-Final-Report-2025-10-10.pdf)

LPA	Plan period		Employment need	Employment supply	Surplus/unmet need
South Downs National Park Authority	2024-2042 (19 years)	Total	73,600	134,125 ⁹	+60,525
		<i>m² per annum</i>	3,874	N/A	N/A ¹⁰
Portsmouth City Council	2025-2040 (15 years)	Total	107,485	138,746	+31,261
		<i>m² per annum</i>	7,166	9,250	2,084

Table 2: Employment Land Position - January 2026

Portsmouth City Council's Position

3.14 Much of the evidence on economic development that supports the Local Plan both in regard to the need and the supply of employment land is provided by the HEDNA. This analysed the outlook for employment growth up to 2040 in Portsmouth and the results of the analysis were used to inform the employment floorspace and land needs forecasts. Drawing the need (107,485m²) and supply (138,746m²) positions from the HEDNA and HELAA together there is a surplus of 31,261 m² of employment floorspace, which is entirely office floorspace. The City Council has formally offered this surplus to Havant Borough Council to help meet its unmet need under the Duty to Cooperate.

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 draft Regulation 19 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.

⁹ Includes 62,000m² at Shoreham Cement Works

¹⁰ The Shoreham cement works site is due to deliver in 2038 meaning that annualised employment figures would not present an accurate picture for the SDNPA.

Agreed Position

3.16 The City of Portsmouth is the centre of a wider Portsmouth FEMA which also encompasses the Boroughs of Gosport, Fareham and Havant, and the southern parishes of Winchester and East Hampshire Districts. The South Downs is covered by several FEMA's along its length. The Portsmouth FEMA borders the SDNPA to the north. The two authorities agree that they do not share an FEMA, however, there is some economic connection between Portsmouth and the Park most notably to Petersfield and along the A3 corridor. The two authorities note the respective positions on employment need and supply. It is agreed that both authorities are meeting their employment needs and there is no unmet need arising from either Local Plan.

Gypsies and Travellers

3.17 SDNPA needs are set out in the South Downs, Brighton and Hove and Adur and Worthing Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) December 2024. This identifies a need of 62 gypsy and traveller pitches and 11 travelling showpeople plots during the plan period. 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. The draft Regulation 19 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. This unmet need was also included in the letter to constituent local authorities and neighbouring LPAs.

PCC Position

3.18 In 2024 PCC updated its GTAA previously carried out in 2018 by Opinion Research Services.

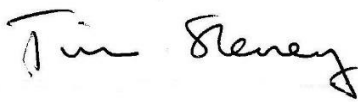
3.19 The assessment provides a robust evidence base that assesses the housing needs of gypsies and the travelling community. In summary the study showed that there is no identified need for additional pitches in Portsmouth over the plan period for Gypsy and Traveller households, as none were identified at the time of the Assessment. In addition, the study concluded that there is no need for additional plots for Travelling Showpeople in Portsmouth over the plan period to 2040 as none were identified.

Agreed Position

3.20 Portsmouth's land supply to cater for its own development needs is extremely constrained and limited, and as such, the City is not in a position to meet any of the South Down's unmet need for gypsies, travellers and travelling showpeople.

4. Signatories

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

	Signed:	Signed:
		
	Name: Lucy Howard	Name: Tim Slaney
	Position: Head of Planning Policy	Position: Director of Placemaking
	Portsmouth City Council	South Downs National Park Authority
	Date: 18.02.26	Date: 19.02.26