

**Portsmouth City Council's Response to the
Inspectors' questions for
Matter 11
Greening the City policies**



Matter 11: Greening the City policies

Issue: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the green infrastructure, biodiversity, trees and hedgerows, and international nature designation policies in Chapter 9 of the Plan.

This issue includes detailed consideration of policies PLP38 to PLP46.

PLP38: Green Infrastructure

- 1) **Is it sufficiently clear what types of green and blue infrastructure form the Green Grid and if (and how) this differs from the 'green infrastructure network' and 'Green Infrastructure' more broadly, which are also referred to in the policy and elsewhere in the Plan?**
- 11.1.1 Yes. Figure 9.1 identifies the City's Green Grid, including existing Local Green Spaces and Green Corridors. It also shows the location for future enhancements; including improved connectivity between spaces enabling the movement of wildlife and people along green corridors. PLP38 and Figure 9.1 provide the starting point for future projects and programmes, including the Council's Green Infrastructure Strategy and Implementation Plan being developed through the Council's Nature Towns and Cities project, which brings together partners responsible for policy, delivery and implementation.
- 11.1.2 The concept of the Green Grid was first introduced through the Partnership for South Hampshire (PfSH) Green Infrastructure Strategy [GC04]. The South Hampshire Green Grid comprises a strategic network of green infrastructure components including designated and protected areas, parks, routes and coastline. Paragraphs 5.2.12 and 5.2.16 of the Green Infrastructure Background Paper [TP03] recognise the contribution the Portsmouth Green Grid can make to the delivery of the South Hampshire Green Grid.
- 11.1.3 The Green Infrastructure Background Paper [TP03] distinguishes between the different terminologies throughout the Paper. This can be summarised as follows:
 - Green Infrastructure: individual assets or components of green infrastructure including open spaces (parks, allotments and churchyards), blue infrastructure (coastal waters and other water bodies), individual green assets (trees, hedges, green roofs) and the ecological network (designated sites) as listed in full at paragraph 3.1.2 of TP03.
 - Green Infrastructure Network: this is the network of green infrastructure assets or components, as set out above.
 - Green Grid: this comprises a series of existing and proposed green corridors and spaces (including green infrastructure and the green infrastructure network) to create a City-wide network of green infrastructure as set out in Figure 9.1.
- 11.1.4 At the request of Portsmouth City Council Public Health, Main Modification MM123 is proposed:

The Green Grid is intended to create green corridors, which provide benefits for both nature and the health and wellbeing of residents. This is intended to help the City meet Natural England's accessible greenspace standard which aims to promote access to good quality green and blue space within 15 minutes' walk from home. In addition, development should take opportunities to improve access to green and blue spaces for residents wherever possible. Opportunities should be taken through the provision of signage and other ways which are accessible to the wider community to raise awareness of these benefits.

2) Is the approach to green infrastructure corridors justified and effective. In particular:

a. What are the reasons for distinguishing between existing and proposed green infrastructure corridors in Figure 9.1 of the Plan?

- 11.2.1 It is important to show existing components of green infrastructure so that "gaps" in the network can be identified and so that it is clear where future connections are required to maximise connectivity. This is how the Green Grid will be developed in order to make nature in Portsmouth bigger, better and more joined up.

b. Is it sufficiently clear how delivery of the proposed corridors will be achieved?

- 11.2.2 Yes. Paragraph 9.19 states that the City Council is in the process of developing strategies that will set out how the five standards in the Natural England Green Infrastructure Framework (PCC12) will be met. This includes green infrastructure and biodiversity strategies being prepared as part of Nature Positive Portsmouth project, which will inform delivery and implementation.

c. Are the existing and proposed corridors intended to be treated as being in fixed locations? If so, how will development of the strategic sites that may affect a corridor be considered?

- 11.2.3 Existing corridors are fixed. Proposed corridors are not fixed but are shown in locations which are identified as suitable for future green corridors. This could include, but is not limited to, locations where a road is wide enough to accommodate green infrastructure, for example verges or hedgerows.
- 11.2.4 In terms of strategic sites, Policy PLP38: Green Infrastructure and Figure 9.1 identify where green infrastructure is expected to contribute towards the Green Grid. However, the precise location and detailed design will be developed through the master-planning process and having regard to individual site constraints, technical evidence and other opportunities or funding which are available at the time.

3) Is it sufficiently clear when and how each part of the policy is intended to apply to development proposals and are any intended requirements proportionate for different types and scales of development?

- 11.3.1 Yes. It is clear that not all of the criteria can be applied to all types of development and as such, there is no explicit requirement for every element of the policy to be applied to every development proposal. The policy establishes a framework for the protection and enhancement of green infrastructure, the form of which will necessarily differ dependant on the scale and location of development. Specifically:

- Criterion 1 can be applied to all development proposals and is directly related to the purpose of the policy.
- Criterion 2 is intended to apply to major development, as per paragraph 9.18 which states that "Major development in Portsmouth should be designed and delivered....". An amendment is proposed [PCC 15] to criterion 2 to provide consistency with paragraph 9.18:

2. Major Development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework including the 15 GI Principles and emerging Portsmouth City Council Greening Strategies.

- Criteria 3, 4, 5 and 6 make clear that they only apply under certain circumstances, for example "Development proposals that reduce the quality...." or "Proposals which impact the

Green Grid", meaning that if proposals are not affected, they do not need to comply. The use of "where possible" at criterion 5 demonstrates that it is not expected in all circumstances.

- Criterion 7 provides flexibility, acknowledging that on-site provision cannot always be provided.

4) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

11.4.1 Yes, Policy PLP38 provides a clear framework for protecting and enhancing Portsmouth's green infrastructure while supporting opportunities to develop the City-wide Green Grid. PLP38 is based on evidence provided in the Green Infrastructure Background Paper [TP03] which also references the PfSH Green Infrastructure Strategy [GC04] providing conformity with sub-regional objectives, in accordance with paragraphs 24 to 27 of the NPPF. It also allows for integration with green infrastructure initiatives being developed outside of the Local Plan process.

PLP39: Biodiversity

5) Is the policy positively prepared, justified, effective and consistent with national policy?

11.5.1 Yes, Policy PLP39 is positively prepared, justified, effective and consistent with national policy. The Biodiversity and Portsmouth Background Paper [TP02] sets out the evidence on which PLP39 is based, providing a justified strategy for the conservation and enhancement of biodiversity in Portsmouth. The policy requirement for up-to-date ecological information to be submitted supports the effectiveness of PLP39. PLP39 together with the Local Plan Policies Map [KD04a] is consistent with paragraph 192 of the NPPF.

PLP40: Biodiversity net gain

6) Is the policy compatible with and justified in the context of the statutory framework and national policy and guidance relating to biodiversity net gain, including The Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026?

11.6.1 Yes, Policy PLP40 is compatible with and justified in the context of the statutory framework and national policy and guidance. National biodiversity net gain requirements require that development must achieve at least a 10% increase in biodiversity value compared to the pre-development baseline, unless exempt. PLP40 is justified as it aligns with this national requirement. Exemptions, including those introduced in 2026, are covered by part 1 of the policy which states "except exempt development".

11.6.2 Three strategic sites owned by Portsmouth City Council are identified for 20% biodiversity net gain. This is compatible with the statutory framework which requires "at least a 10% increase". A 20% increase is justified as evidenced by the PCC Viability Study Update for Regulation 19 [HO15] at paragraphs 8.68 to 8.70 and in the Biodiversity and Portsmouth Background Paper [TP02].

7) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

11.7.1 Yes, Policy PLP40 is positively prepared, justified, effective and consistent with national policy. The Biodiversity and Portsmouth Background Paper [TP02] provides evidence to support the requirement for biodiversity net gain. PLP40 is consistent with national policy in that it requires at least a 10% gain. Specific requirements for 20% are justified by evidence and will be effective in supporting the Council's priorities for a greener City in accordance with paragraph 192b) of the NPPF.

PLP41: Trees and Hedgerows

8) Is the 15% tree canopy cover requirement for major development at part 1(c)(i) justified and likely to be feasible for development anticipated in the Plan?

11.8.1 Paragraph 136 of the NPPF recognises the important contribution trees make to urban environments, including mitigating and adapting to climate change. The Council's i-Tree Eco survey [GC20] shows that tree canopy cover in Portsmouth City currently equates to 8.9%. The Natural England Green Infrastructure Framework includes an Urban Tree Canopy Cover Standard, which promotes an increase in tree canopy cover in urban environments. The City also experiences concentrations of extremely high heat as evidenced by the New Urban Heat Islands Analysis published by the Ordnance Survey [PCC13] and recent press article: Most vulnerable cities in Great Britain to extreme heat [PCC17]. The importance of tree cover will increase as the climate becomes hotter. An increase in tree cover is justified in order to mitigate and adapt to climate change.

11.8.2 The 15% target for major development is feasible. Policy PLP41 does not require separate tree planting in addition to other requirements, which means that there will be opportunities for tree planting to be incorporated as part of a biodiversity net gain scheme, amenity space, landscaping or sustainable drainage (PCC underline for emphasis).

9) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

11.9.1 Yes, Policy PLP41 is justified as evidenced by low existing tree coverage, published standards by Natural England and the high City temperatures. Policy PLP41 will be effective in delivering multiple benefits, including mitigating and adapting to climate change. It is therefore consistent with paragraph 162 of the NPPF.

PLP42: Solent Waders and Brent Geese Sites

10) Is the policy positively prepared, justified, effective and consistent with national policy?

11.10.1 Yes, Policy PLP42 is evidenced by the Solent Waders and Brent Goose (SWBGS) Strategy [GC19]. This provides an effective strategy for the protection of SPA supporting habitat used by protected Geese and Waders across Hampshire, the Isle of Wight and Sussex.

11.10.2 PLP42.1 references the Strategy, confirming that mitigation will depend on the importance of the site. The Strategy identifies sites important for wintering birds and provides online mapping and records in accordance with paragraph 192a) of the NPPF. It is important that the Strategy is referenced in PLP42 as this provides the evidence to inform decisions and if necessary safeguarded; consistent with paragraph 192a) of the NPPF.

11.10.3 PLP42.2 confirms that mitigation should be provided as set out in the Strategy. Paragraph 2.3 of the SoCG with Natural England [SCG27] confirms that all the Regulation 19 comments raised by NE have been addressed and that NE have no outstanding reasons to challenge the soundness of the Plan. This is important to ensure clarity and consistency; enabling the delivery of sustainable development alongside the protection of supporting sites; consistent with paragraph 16a) of the NPPF.

PLP43: Recreational Disturbance on International Nature Designations

11) Is the policy positively prepared, justified, effective and consistent with national policy?

- 11.11.1 Yes, Policy PLP43 is evidenced by the Bird Aware Solent Revised Strategy [GC17]. This provides an effective, long-term strategy for mitigating the impact of recreational disturbance associated with residential development on protected Brent Geese and Waders, across the Solent. The Strategy provides a Charging Schedule, allowing developers to pay a financial contribution. PLP43 references this but also makes provision for a bespoke mitigation package at PLP43.2. Paragraph 2.3 of the SoCG with Natural England [SCG27] confirms that all the Regulation 19 comments raised by NE have been addressed and that NE have no outstanding reasons to challenge the soundness of the Local Plan. This provides clarity and consistency; enabling sustainable development alongside measures to mitigate disturbance on protected birds; consistent with paragraph 16a) of the NPPF.

PLP44: Nutrient Neutrality in International Natural Designations

12) Is the policy positively prepared, justified, effective and consistent with national policy?

- 11.12.1 Yes. Policy PLP44 is evidenced by the Interim Nutrient Mitigation Strategy (GC01), the Nitrate Mitigation Strategy [GC08] and the Nutrient Neutrality Technical Paper at Appendix F of the HRA [KD18]. The Mitigation Strategy provides an effective, long-term strategy for mitigating the impact of nitrates from additional wastewater on protected sites. The Statement of Common Ground [SCG27] between Portsmouth City Council and Natural England (February 2026) confirms agreement for the use of the Interim Nutrient Neutral Mitigation Strategy and the updated plan level nutrient budget as set out in the HRA [KD18] which sets out a 9.55-year supply of credits. Paragraph 2.3 of the SoCG with Natural England (SCG27) confirms that all the Regulation 19 comments raised by NE have been addressed and that NE have no outstanding reasons to challenge the soundness of the Local Plan. This provides clarity and consistency; enabling sustainable development alongside measures to achieve nutrient neutrality; consistent with paragraph 16a) of the NPPF.

PLP45: Open Space

13) Paragraph 9.107 of the Plan and evidence such as the Portsmouth Open Spaces Assessment 2020 Addendum [GC09] and the Playing Pitch Strategy 2018-34 [GC03] indicate that there are deficits in types of open space beyond those specified in Table 9.1 of the Plan. In that context, will the policy effectively address the identified needs for different forms of open space?

- 11.13.1 The existing Play Pitch Strategy [GC03] was published in 2018 and an addendum [GC09] was published in 2020. The conclusions of the addendum are presented at Section 3 of GC09. This recognises the difficulty in achieving quantitative improvements given the constrained island geography of the City and its existing high densities. Instead, recommendations are made for qualitative improvements. This is reflected at criterion 1 which seeks the creation, protection or enhancement of open space (PCC underline for emphasis). Criterion 3 relates specifically to major development and confirms, where it can be demonstrated that an area of open space is not feasible, an appropriate off-site provision and/or enhancement will be secured. In the last resort an appropriate developer contribution will be used to enhance open space elsewhere in the city (PCC underline for emphasis). This approach is supported by Portsmouth City Council Public Health as evidenced in the Statement of Common Ground [SCG22].
- 11.13.2 PLP45 provides a robust basis for the protection and enhancement of existing open space and the creation of new open space. Evidence [GC03, GC09, SCG22 and SCG23] recognises that it is not always possible or appropriate to create new open space and, in this context, PLP45 provides sufficient flexibility for enhancements, improvements or contributions in lieu of quantitative measures.

14) Is the policy based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision over the plan period in line with paragraph 103 of the Framework?

11.14.1 Section 2 of the Statement of Common Ground between Portsmouth City Council and Sports England (SCG23) sets out the timescales for an update to the Playing Pitch Strategy and the rationale for this. The timescales allow for the future strategy to capture recent, significant sports development in the city and are agreed by Sports England [SCG23].

11.14.2 The existing Play Pitch Strategy [GC03] was published in 2018 and covers the period to 2034. An addendum [GC09] was published in 2020 to take into account updated population figures and a change in the Local Plan period. The conclusions of the update are presented at Section 3 of the addendum [GC09] and identifies a deficit of playing pitches which cannot be met in the context of the City's constrained island geography. This is also identified in the Council's response to the Inspectors Initial Questions [PCC06] at paragraphs 4.1 and 4.2.

11.14.3 Instead, recommendations are made for qualitative improvements and opportunities are provided for enhancements at criteria 1 and 3 - see response to Q13 above. This approach is supported by Portsmouth City Council Public Health as evidenced in the Statement of Common Ground [SCG22].

11.14.4 A focus on qualitative improvements is consistent with paragraph 103 of the framework which supports access to a network of high-quality open spaces and opportunities for sport and recreation. Whilst policies should be based on up-to-date assessments and plans should seek to accommodate provision (PCC underline for emphasis), this is not definitive and therefore in the context of Portsmouth, it is appropriate to prioritise qualitative improvements alongside quantitative.

15) Is part 2 of the policy justified and consistent with paragraph 104 of the Framework?

11.15.1 Yes. Parts 2 a) b) and c) reflect paragraph 104 of the NPPF. Part d) is in addition to the criteria at paragraph 104 and is also a point of disagreement in the SoCG with Sport England [SCG23]. On this basis, a Main Modification is proposed to delete criterion d. of PLP45 as set out in the Supplementary Modifications Schedule [PCC15].

16) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

11.16.1 Yes, as set out in response to Questions 13, 14 and 15 and as evidenced by GC03, GC09, SCG22 and SCG23.

PLP46: Local Green Spaces

17) Is the designation of the Local Green Spaces specified in the policy consistent with paragraphs 106 to 108 of the Framework and justified by an appropriate methodology and evidence?

11.17.1 Yes, the designation of the Local Green Spaces specified in Policy PLP46 is consistent with paragraphs 106 to 108 of the Framework. Their designation is supported by an appropriate methodology, the detail of which can be found in section 3 and Appendix 1 of the Local Green Spaces (LGS) Background Paper [TP13]. The LGS Background Paper [TP13] is the main evidence base to support the policy.

18) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

11.18.1 Yes, as evidenced in the Local Green Spaces Background Paper [TP13].