

**Portsmouth City Council's Response to the
Inspectors' questions for
Matter 4
Vision, strategic objectives and
development strategy**



Matter 4: Vision, strategic objectives and development strategy

Issue: Whether the Plan's vision, strategic objectives and development strategy are positively prepared, justified, effective and consistent with national policy.

Vision and strategic objectives

- 1) **How do the overarching vision and strategic objectives in Chapter 2 of the Plan provide a positively prepared and justified approach for the city's future growth?**
 - 4.1.1 The Imagine Portsmouth Vision provides a positive vision for the future of the City in line with paragraph 15 of the NPPF. The Plan's strategic objectives flow from the Vision and are stepping stones between the Vision and the Plan's policies. The Development Strategy set out in chapter 3 of the Plan seeks to implement the Imagine Portsmouth Vision. Paragraph A2 of the Plan states that 'it is an ambitious development strategy in order to deliver positive outcomes for everyone with a vested interest in the City whilst addressing the twin climate and biodiversity emergencies. Although the strategy is aspirational, it recognises that the capacity for growth in the City is limited by land supply, flooding and nature conservation designations.'
 - 4.1.2 The Plan is positively prepared, and the Council has left no stone unturned in seeking to meet the City's objectively assessed needs. Portsmouth has a constrained island geography, which is explained in the Constraints Topic Paper [TP12]. This document summarises the constraints that impact the ability to deliver development in the City of Portsmouth and thus make it impossible to meet development needs in full. It highlights the ambitious but balanced rationale for the choices made in the Local Plan and references the documents that helped to inform the choices made. The topic paper references the evidence and justification for the positions taken for the Plan's housing, employment and open space targets contained in strategic policies: PLP16: Housing Target, PLP25: Employment Target and PLP45: Open Space. The evidence of the City's constrained island geography is set out in many of the evidence based studies supporting the Plan most notably the Housing and Economic Land Availability Assessment (HELAA) [HO04], the Strategic Flood Risk Assessment (SFRA) 1 [CE02a], SFRA2 [CE04a] and the Playing Pitch Strategy [GC03].
 - 4.1.3 The Plan is also justified being based on an appropriate strategy. The various iterations of the Sustainability Appraisal (SA) explore all the reasonable alternatives that were considered both for the overarching strategy and for a number of individual policies. Chapter 5 of the SA published in 2021 [KD08] to support the Regulation 18 version of the Plan sets out reasonable alternatives for appraisal and then consultation. Chapter 6 and particularly table 6.1 presents the summary findings of the appraisal of the reasonable alternatives with the detailed findings presented in Appendix IV of the same document.
- 2) **How are the individual visions for the strategic sites (in policies PLP3 to PLP9), the design vision (on page 34 of the Plan), the development strategy and the policies in the Plan aligned with the overarching vision and strategic objectives?**
 - 4.2.1 Paragraphs 2.4 to 2.6 of the Plan explain how the Imagine Portsmouth 2040 Vision and its strategic objectives are linked to all the policies in the Plan. This is illustrated by and clarified by the use of icons for all the six objectives throughout the Plan.
 - 4.2.2 The bespoke vision for each of the strategic sites, which are all mission critical for achieving the overall vision, is set out in the final paragraph of the introductory text to each strategic site policy. For example, the vision for Lakeside is set out in paragraph 4.64 of the Plan and talks about the site remaining the premier location for high quality business space within its parkland setting. Three icons are set out for the Policy relating to a City with a thriving economy, a City of lifelong learning and a green City.

- 4.2.3 Paragraph 132 of the NPPF says that plans should set out a clear design vision. The design vision for Portsmouth is set out after paragraph 3.31 of the Plan and is based on the Imagine Portsmouth 2040 Vision. The development strategy of the Plan seeks to implement the Imagine Portsmouth 2040 Vision. Each policy of the Plan seeks to achieve one of the six strategic objectives. For example, Policy PLP41: Trees & Hedgerows seeks to deliver on the strategic objective of 'greening the City.'

Development strategy

3) **Is the plan period of 2025 to 2040 justified? What are the anticipated implications for the Plan, and the underpinning evidence, if this were to be extended to achieve a 15 year plan period on adoption?**

- 4.3.1 Yes, the plan period of 2025 to 2040 is justified. An explanation of the plan period is given in paragraph 0.15 and 0.16 of the Plan [KD03]. The plan period is also referenced in the answer to question 42 of the Soundness & Quality Assessment of the Local Plan [KD31].
- 4.3.2 The main changes to the evidence base that would be necessitated by an extension to the plan period are set out in paragraphs 22.2 to 22.5 of the Council response to ID01 Inspectors' Initial Questions [PCC06].
- 4.3.3 It should be noted that Policy PM2: Local plans of the new Framework [PCC08] requires local plans to cover a period of no less than 10 years from the point of adoption of the plan. Although this Plan was prepared and is being examined under the 2024 Framework it is relevant to note the direction of travel taken by Government policy in regards to plan periods. The plan period of this Plan is clearly consistent with the new Framework.

4) **Do the strategic policies in the Plan set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes, employment, retail, leisure and other commercial development?**

- 4.4.1 Yes, the core and strategic policies of the Plan set out an overall strategy for both the pattern, scale and design quality of places and meeting development needs in the City.
- 4.4.2 Criteria 2 d) and e) of Policy PLP1: Design address the pattern of development. Criterion 2.v of the same policy references scale and criterion 7 sets out an overall strategy for tall buildings in the City. Criterion 1 of PLP1 states that development proposals will be supported provided that they make a positive contribution towards achieving the Portsmouth Design Vision.
- 4.4.3 Policy PLP16 sets out the housing target for the City. There is a shortfall of 4,195 homes against the standard method reducing to a shortfall of 3,247 dwellings once the contributions through the Duty to Cooperate have been taken into account; this is explained fully in the answer to matter 2, question 2. The inability to meet housing need is due to Portsmouth's constrained island geography as explained in the answer to matter 2, question 2 b.
- 4.4.4 Policy PLP25 sets out the employment target for the City. There is an overall surplus of 22,743 m² of new employment floorspace, which is entirely office floorspace using the updated figures set out in the answer to matter 3, question 2. Employment need is therefore met in the City and the surplus has been given to Havant through the Duty to Cooperate to help meet the Borough's unmet need for offices.
- 4.4.5 Policy PLP28: Town Centres makes provision for retail and other town centre uses in the City's town centre hierarchy. Paragraph 7.48 of the Plan references the Retail and Leisure Study Update 2024 [TE14], which shows a projected increase in the need for retail floorspace of

between 6,300m² and 6,700m² over the next ten years of the plan period. The majority of this (4,200m² to 4,600m²) is comparison goods floorspace growth, which will be accommodated within the Commercial Road area of the City Centre and at Gunwharf Quays. The Study shows very limited projected growth for convenience goods floorspace over the next ten years. It is relevant to note that permission was recently granted [23/01567/FUL] for waterfront redevelopment at Gunwharf Quays that aims to enhance public realm and create 'an enhanced al-fresco dining destination with improved views of the waterfront' [PCC22].

- 4.4.6 Paragraph 7.2 of the Plan notes that 'a huge variety of businesses and activities can provide jobs, and of course not all of these take place in offices, industrial premises and warehouses.' Planning applications for other forms of commercial development will be considered positively in line with the Plan's overarching development strategy and the Portsmouth Economic Development and Regeneration Strategy [TE05].

5) Is it clear how the chosen development strategy was arrived at and is it based on relevant and up-to-date evidence?

- 4.5.1 The Plan's development strategy seeks to implement the 2040 Imagine Portsmouth Vision. A draft development strategy was proposed in the Regulation 18 version of the Plan consulted on in 2021 [PRE01]. Feedback summarised in the Submission Consultation Statement [KD34] was that the draft development strategy along with the vision, objectives and key themes was too vague and complex. The development strategy was re-worded in the Pre-Submission Local Plan to make it clearer and more succinct. Furthermore, the map of the City that formed figure 3 of the Regulation 18 Plan was replaced by the key diagram in figure 3.1. The key diagram shows the island geography of the City and the drivers behind the development strategy and individual policies.

- 4.5.2 Yes, the development strategy is based on relevant and up-to-date evidence set out in the examination library. Evidence based studies of particular note in regards to the formulation of the development strategy are the various iterations of the Sustainability Appraisal, which explore all the reasonable alternatives that were considered for the overarching strategy, the Constraints Topic Paper [TP12] that summarises the constraints that impact the ability to deliver development in the City and thus make it impossible to meet development needs in full and the Housing Background Paper [TP07] which demonstrates that no stone has been left unturned in the search for housing sites.

6) Is there sufficient flexibility within the development strategy to accommodate unexpected delays whilst maintaining the credibility of the strategy, including its ability to address housing, employment and other needs?

- 4.6.1 Yes, there is sufficient flexibility within the development strategy because it seeks to maximise the potential of all developable sites in the City without reserving or delaying development on other reserve sites. There are no alternative development sites in Portsmouth unlike a more rural or suburban local planning authority where there are alternative developable sites that are not being allocated. This is evidenced by the lack of omission sites being promoted by developers. The Council will respond positively to all development proposals that come forward unexpectedly as long as the sites are developable and proposals accord with the Local Plan and national Development Management policies set out in the new Framework [PCC08]. This has been exemplified by the proposed redevelopment of the four tower blocks as discussed in the LPS Tower Blocks Topic Paper [PCC16].

7) How have the potential impacts of the Plan beyond the city boundary been considered and reflected in the development strategy?

- 4.7.1 The potential impacts of the Plan beyond the City boundaries have been considered throughout the plan making process. Extensive work with neighbouring local authorities on strategic cross

boundary issues has taken place through the Duty to Cooperate. The Duty to Cooperate Statement [DTC01] evidences how the Council has met its Duty to Cooperate requirements.

4.7.2 The Statement sets out the key cross boundary issues for the City in paragraph 1.4.4 and how these have been reflected in the development strategy is set out below:

- Delivery of New Homes: the development strategy maximises the potential of developable sites in the City due to its constrained island geography.
- Habitat Regulation Assessment including Nutrients, Recreational Disturbance, Protected Sites and Biodiversity: the development strategy addresses greening the City.
- Development of a Thriving Economy: the development strategy maximises the potential of developable sites in the City due to its constrained island geography.
- Promotion of Sustainable and Active Cross Boundary Transport: although not mentioned in the development strategy this is obviously a key issue for the City. It is addressed in the Local Transport Plan [IN08] the vision for which is that 'by 2038 Portsmouth will have a people centred travel network that prioritises walking, cycling and public transport to help deliver a safer, healthier and more prosperous City.'
- Cross Boundary Strategic Sites and Allocations: the development strategy references the strategic sites and extensive work was done with neighbouring authorities and statutory bodies on the allocation of Tipner West as set out in the various iterations of the Tipner West Topic Paper [TP10].

8) **Have the sites allocated and identified for development in the Plan been appraised and selected using a robust and objective process?**

4.8.1 Yes, the approach taken is set out in section 4 of the Allocations Topic Paper [TP08] which cross references the evidence from the Housing and Economic Land Availability Assessment (HELAA) Report and Appendices 2025 [HO04] and HELAA Methodology 2025 [HO03] which informed the Pre-Submission Portsmouth Local Plan Addendum 2025 [KD02], and the HELAA Report and Appendices 2023 [HO008] and HELAA Methodology 2023 [HO07] which informed the Pre-Submission Portsmouth Local Plan 2024 [KD01]. Both the 2023 and 2025 iterations of the HELAA have been prepared in line with national policy and guidance.

4.8.2 New sites added post-submission due to changing circumstances have been subject to the same assessment process as documented in the LPS Tower Blocks Topic Paper [PCC16].

9) **Is the approach taken to identifying sites in Appendix 2 of the Plan positively prepared, justified, effective and consistent with national policy?**

4.9.1 Yes, as documented in evidence, notably the Allocations Topic Paper [TP08] paragraph 4.2.6. The identified sites in Appendix 2 are drawn from the various HELAA documents (HELAA Report and Appendices 2025 [HO04], HELAA Methodology 2025 [HO03], and HELAA Report and Appendices 2023 [HO08] and HELAA Methodology 2023 [HO07]) and post-submission, a further site is proposed to be added to Appendix 2, details of which are set out in the LPS Tower Blocks Topic Paper [PCC16].

10) **In respect of flood risk, is the sequential and exception testing that has been undertaken for the Plan robust and consistent with national policy?**

4.10.1 Yes. Paragraph 172 of the NPPF requires plans to apply a sequential, risk based approach to the location of development, taking into account all sources of flooding. The Council's Sequential and Exception Test [CE05] has been prepared in accordance with the latest Environment Agency advice and mapping, as set out at paragraph 1.4 of CE05. References to future flood risk refer to maps published as part of the Partnership for South Hampshire (PfSH) Strategic Flood Risk Assessment (SFRA) Levels 1 and 2 [CE02a-CE04b]. The Portsmouth Specific Level 2 SFRA

[CE04a & CE04b] was updated in November 2025 to reflect changes made to allocations in the Local Plan Addendum. The approach to sequential and exception testing is agreed with the Environment Agency at paragraph 2.22 of the Statement of Common Ground [SCG25] and is therefore robust and up to date.

- 4.10.2 Paragraph 174 of the NPPF states '...the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.'
- 4.10.3 Paragraph 4.2.3 of CE05 states 'Given the extremely limited number of deliverable and developable sites in the City, sites in all flood zones have been included for assessment in the HELAA. The HELAA 2025 Methodology proposes discounting sites at stage 1 if they are entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability) but none of the sites assessed were entirely within such areas, so no sites were rejected on that basis.'
- 4.10.4 In light of this, it is accepted that sites which include areas of flood zone 2 and 3, either present or in the future, will need to be allocated for development paragraph 4.3.4 of CE05). Tables 2 and 3 of CE05 assess each of the strategic, deliverable and developable sites by identifying the percentage of the site which lies within FZ 2 and 3, making recommendations for a sequential approach to development within the site and/or identifying where the exception test is required. Where the exception test is required, a site specific Flood Risk Assessment will be required to ensure development is safe for its lifetime, in accordance with paragraph 178 of the NPPF.
- 4.10.5 As the Council is unable to meet its development needs from sites which pass the sequential test, the exception test is required at a plan level. Paragraph 178 of the NPPF sets out the requirements of the Exception Test, summarised as:
- a) The development would provide wider sustainability benefits
 - b) The development would be safe for its lifetime.
- 4.10.6 The Local Plan Exception test part a) is based on the Level 2 SFRA and considers the findings of the Sustainability Appraisal [KD09 and KD11] which assess City-wide spatial options for housing growth (paragraph 5.2.2 of CE05) and identifies wider sustainability benefits associated with the development of each allocated site (Table 5 of CE05). Paragraph 5.2.8 concludes that, 'Overall Table 6 shows that development of the strategic sites and site allocations would provide wider sustainability benefits to the community that outweigh the flood risk, including a significant contribution to housing supply, delivering economic growth and regeneration, and new, much needed flood defences. It is therefore demonstrated that the first element of the Exception Test has been satisfied.'
- 4.10.7 The Plan lists the site-specific flood measures that need to be implemented to ensure individual strategic sites and site allocations are capable of passing the exception test in accordance with Part b) of the Exception Test. This includes site specific measures which will need to be reapplied at the planning application stage to take into account more detailed information about the proposed development and the specific mitigation proposed to make development safe and reduce flood risk overall through a site-specific flood risk assessment, in accordance with paragraph 180 of the Framework.