

Portsmouth City Council's Response to the Inspectors' questions for

Matter 7

Sites allocated and identified in the plan



Portsmouth
CITY COUNCIL

Matter 7: Sites allocated and identified in the Plan

Issue: Whether the sites that are proposed for allocation or otherwise identified in the Plan are positively prepared, justified, effective, and consistent with national policy.

The issue includes detailed consideration of the sites 'allocated' by policies PLP3 to PLP15, and the sites 'identified' in Appendix 2 of the Plan.

Questions applicable to all sites

1) Since the submission of the Plan, has the Council resolved to approve or grant planning permission for any of the sites allocated or identified in the Plan, and does this indicate that the development anticipated for any of the sites should be updated?

7.1.1 Yes, there have been some resolutions to grant since the Council submitted the Plan. This relates to the following sites:

- CD18: Debenhams, Commercial Road (Part of PLP6: Portsmouth City Centre). Planning application 24/00650/OUT achieved resolution to grant planning permission 18.03.2026. The number of dwellings anticipated for the site has changed from 569 to 554 dwellings to reflect the latest figure from the planning application. This has been reflected in the updated housing trajectory.

7.1.2 There have also been some permissions granted. This relates to the following sites:

- CD25: Portsmouth Mail Centre (Part of PLP6: Portsmouth City Centre). Planning permission granted for application 24/01246/FUL on 23.12.2025. No updates are required to the Housing Trajectory.
- PLP15: Somers Orchard. Planning permission granted for applications 23/01574/FUL 23/01574/FUL on 02.12.2025. No updates are required to the Housing Trajectory.
- MI07: 185-192 Highland Road (deliverable site identified in Appendix 2). Planning permission granted for application 24/00085/FUL on 20.03.2026. The number of dwellings anticipated for the site has changed from 8 to 9 dwellings based on the amendment made to the planning application. This has been reflected in the updated housing trajectory.
- EC14 Eastney Swimming Pool (deliverable site identified in Appendix 2). Prior approval required and granted for demolition of pre-existing building (ref. 25/01034/DEM). No updates are required to the Housing Trajectory.
- HI01: Hilsea Lodge (Highgrove) (developable site identified in Appendix 2). Prior approval required and granted 03.02.2026 for the demolition of Hilsea Lodge and Annexes (ref. 26/00007/DEM). No updates are required to the Housing Trajectory.
- ST13 62 Middle Street (developable site identified in Appendix 2). Planning permission granted for application 25/00590/FUL on 01.01.2026. This site is now counted in the outstanding planning applications figure at 31st March 2026 in the revised housing trajectory rather than in the section on developable sites, but the overall number of dwellings anticipated for the site has not changed.
- NE01: Connect Centre (developable site identified in Appendix 2). Planning permission granted for applications 25/00568/FUL and 25/00358/PA on 30.09.2025. No updates are required to the Housing Trajectory.

2) Are updates required to any of the sites allocated or identified in the Plan to reflect changes to their availability, capacity, or for any other reasons since the Plan was submitted for examination?

7.2.1 Yes, some updates are required to some allocations and identified sites to reflect changes post submission. These are reflected in the new Housing Trajectory. The changes proposed are as follows:

7.2.2 Changes are proposed to the housing numbers at allocations PLP6: Portsmouth City Centre, and PLP12: St John's College. The details of these are provided in the Council's answers to questions in Matter 7 relating to those sites.

7.2.3 Changes are proposed to the following identified sites:

Deliverable Sites from the HELAA 2025

7.2.4 FR06 St Wilfrids Church - this site has been removed from Appendix 2 as this is no longer available.

7.2.5 MI07 185-192 Highland Road - the number of homes for this site has been amended from 8 to 9 to reflect a change made to the pending planning application for the site (ref. 24/00085/FUL).

7.2.6 HI02 Land of former supermarket - the number of homes for this site has been amended from 20 to 24 to reflect the fact that an application has now been submitted for 24 units (ref.26/00096/FUL). The site has also been reclassified from developable to deliverable as it is anticipated that the site will secure planning consent and be delivered much sooner now that a planning application has been submitted.

Developable Sites from the HELAA 2025

7.2.7 CD01 Wardroom - this site has been removed as the MOD has indicated that this site is no longer available for development as they now wish to retain it to use for military accommodation.

7.2.8 PA03 140 Southampton Road - this site has been removed as there has been a planning application for re-instatement of car wash to the front of the site, car sales in centre of site and construction of 2 cabins to service car sales and car washing (ref. 26/00109/FUL). It is assumed that plans for residential development by the landowners have been abandoned.

7.2.9 ST13 62 Middle Street - this site has been removed from Appendix 2 as the site now has planning permission, so the homes from this site are now counted in the outstanding planning applications figure at 31st March 2026.

7.2.10 ST29 Tipton & Edgbaston - this is a new site which is proposed to be added to Appendix 2 involving the redevelopment of two tower blocks. The proposals involve the demolition of the existing tower blocks (a loss of 272 units) and replacement with a larger development of 432 units. However, as only 162 of the 432 dwellings will be delivered within the plan period, the site generates a loss of 110 units within the plan period. Further detail on this site is presented in the LPS Tower Blocks Topic Paper [PCC16].

3) **How were the non-residential uses in part 1 of each of the site allocation policies established? Is it sufficiently clear where, and what amount of, that non-residential development could be delivered within each site?**

7.3.1 The non-residential uses for each of the strategic sites and for each of the allocation sites are set out in tables 4.1 and 5.1 respectively of the Plan. Table 7.1 below sets out the non-residential requirements for all the sites allocated in the Plan and states how the figures were established and where the development would be accommodated on the sites. Note that a modification is proposed to PLP4: Tipner East to add 716m² commercial floorspace which is in Table 4.3 but had been missed out of the policy wording, the table below incorporates this and it is reflected in the Schedule of Supplementary Modifications [PCC15].

Table 7.1: Non-residential development allocated in the Local Plan

Policy	Site	Non-residential development	How established	Where located
PLP3	Tipner West	a) 25,000m² B2/B8 b) Flood defences c) Shops which do not exceed 250 m² (F2a) and Meeting places (F2b)	a) Through the optioneering exercise following the first IROPI Opinion. Full details set out in the Tipner West Topic Paper [TP10] b) In line with the North Shoreline Management Plan c) To support a sustainable community and reduce the need to travel as set out in paragraph A45	a) In the northern part of the peninsula next to the listed buildings b) Along the peninsula edges c) Suitable place inside the local community
PLP4	Tipner East	a) Multi-modal transport hub b) 716 m² (E, F1 and F2) and 840 m² ancillary commercial uses c) Flood defences and ground raising	a) Through Planning application 22/00024/OUT b) Through Planning applications 22/01292/FUL and 21/01357/FUL c) Covered by North Shoreline Management Plan, section 5API01 [PCC07]. Further information can be found within the SFRA Level 2 [CE04a]	a) Tipner Interchange, Tipner Lane b) 716 m² of E, F1 and F2 to be located in the part of the site being progressed by Vivid and 840 m² of ancillary commercial uses to be developed at the transport hub c) Adjacent to the M275 to the south of Tipner as set out in paragraph 3.7.3 of the SFRA Level 2 [CE04a]
PLP5	Lakeside North Harbour	50,000m ² Egi	The planning history for the HELAA site COS10 references outline permission that was part implemented (08/02342/OUT) for 69,030sqm of commercial floorspace including offices, a hotel and private hospital. An approximation of the non-implemented part of the permission was carried forward to the allocation.	Site-wide as set out in paragraph 4.63 of the Plan
PLP6	Portsmouth City Centre	a) -2,154m² Egi b) 2.9 ha area of green space at City Centre North c) Cultural, civic, educational and leisure uses	a) The updated monitoring data referenced in the answer to matter 3, question 2 is based on the following breakdown: no net gain at Matalan (CD16), -5,574 m² at City Centre North (CD17) and 3,600 m² at Debenhams (CD18) b) HELAA site CD17; need as set out in paragraphs A71-A73 of the Plan; planning application 22/01243/CS3 c) As set out in paragraph A70 of the Plan, it is anticipated that with large developments	a) No net gain at Matalan (CD16), -5,574 m² at City Centre North (CD17) and 3,600 m² at Debenhams (CD18) b) City Centre North c) Site-wide

Policy	Site	Non-residential development	How established	Where located
			over plan period, the City Centre will become more of a culture and leisure use focused destination. It will also provide educational spaces (Paragraph A68 of the Plan) and civic uses (Paragraph A100-A104 of the Plan) as it is providing now.	
PLP7	Fratton Park & the Pompey Centre	Expanded stadium, hotel and mixed conference and event facilities	The expansion of the stadium from a capacity of 21,000 to between 26,000 and 30,000 is a long-stated aspiration of Portsmouth Football Club. The ancillary hotel and conference facilities are also proposed by the Football Club to complement the expanded stadium	Shown on figure 4.6 of the Plan to be located in the eastern part of the site.
PLP8	St James' & Langstone Harbour	a) Healthcare facilities b) Education facilities c) Recreation, sports and other facilities	a) HELAA site MI01; Inclusion of healthcare facilities are established by the retention of NHS-owned land at The Limes and The Orchards hospitals for future health-related development (Paragraph 4.149 of the Plan) b) Education facilities are supported by the presence of the former University of Portsmouth Langstone Campus and Harbour School site (Paragraph 4.158 of the Plan) c) Through planning application 20/00204/FUL; also established through the retention and enhancement of existing playing fields, cricket facilities, public open spaces and community recreation areas, supported by policy requirements to maintain public access and recreational provision across	a) Paragraph 4.149 of the Plan states that the land north of the Homes England parcel and east of the main hospital site, including The Limes and The Orchards hospitals, is currently in healthcare use. The paragraph further confirms that this land 'is to be retained for any potential future health related development that may be required' b) Across the site as set out in paragraph 4.158 c) Across both part of the allocation as set out in paragraph 4.162 and 4.165

Policy	Site	Non-residential development	How established	Where located
			the site (Paragraphs 4.162, 4.165 and 4.167 of the Plan)	
PLP9	Horsea Island Strategic Open Space	64 hectare strategic public open space with supporting infrastructure for the provision of the open space and ongoing remediation of the former landfill site	Through the site's long-standing allocation for recreational open space in the Portsmouth Local Plan (2006), the approved landfill restoration scheme and Landscape Masterplan (permission A829932/AM), and the strategic objective to provide a 64-hectare public open space serving both existing and planned communities (Paragraphs A124-127 and A134 of the Plan).	Site-wide
PLP10	Land West of Portsdown Technology Park	12,500 m ² Egii, B2, B8	HELAA site PA05A, use classes discussed in paragraph 4.4.25 of the Thriving Economy Topic Paper [TP14] and agreed in the Statement of Common Ground with the site promoter [SCG45]	Criterion 2h of PLP10 requires development to be focused on the previously developed land part of the site with minimal structures on the northern downland slope
PLP11	Port Solent	Marine and leisure related uses	HELAA site PA05A; the inclusion of marine uses is aspirational but no specific quanta are set out	Waterfront
PLP12	St John's College	-	-	-
PLP13	Fraser Range	New sea wall defence and related accessible walkway, access road, parking and landscape work	Through planning application 19/00420/FUL	Site-wide
PLP14	The News Centre	a) Electric bus depot b) Community uses	a) HELAA site HI06, through planning application 23/01470/FUL b) To support the needs of new residents	a) At the former printing press/office complex b) At ground floor level in the residential development
PLP15	Somers Orchard	Approximately 500 m ² commercial & approximately 440 m ² community space	Through Planning applications 23/01574/FUL and 23/01575/FUL	Ground floor of the new blocks

- 4) **Several policies include criteria relating to masterplanning, design codes and the comprehensive development of the site allocations. What are the Council's intended approaches in these respects, would these be proportionate for all types and scales of development that may come forward within the allocations, and have implications for the anticipated development delivery timescales been taken into account?**

- 7.4.1 The Council has reviewed the approaches taken to the issues raised in this question in the various policies and proposes some changes be made in this regard. The rationale behind the various approaches is set out below for the site where the policy references design codes and comprehensive development. It would be expected that all applications for development on any of the site allocations would include a masterplan.
- 7.4.2 Policy PLP3: Tipner West, part 3a) of the policy requires a conceptual site-wide masterplan and accompanying design code framework. This is a Council-owned site, and the Council as site promoter intends to prepare these documents as part of any application for the site. The proposals are for a new community at the site, and at 1,000 units this is a large scale project, so it is considered these requirements are appropriate. It is not anticipated that these requirements would slow delivery timescales as it is something which would be prepared alongside other work on preparing a planning application.
- 7.4.3 Policy PLP4: Tipner East, part 2a) of the policy requires a suitably scaled conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making. The Council proposes removing this requirement from the policy. The site is made up of three main parts, two parcels for housing, one of which has planning permission, and the other has resolution to grant planning permission, and another parcel for a transport hub which had planning permission but has now expired. None of the applications for the site so far have met the requirements of this policy in terms of having a site-wide masterplan and design code, and so the inclusion of this in the policy seems inappropriate, and the need for this has been somewhat overtaken by events. Reference to 'beautiful' is also proposed to be removed for consistency purposes, reflecting a change in approach to wording on design in national policy. The change proposed to 2a) is as follows:
- a) Create a new landmark gateway to the City of Portsmouth to be demonstrated through a suitably scaled ~~conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code;~~
- 7.4.4 PLP5: Lakeside North Harbour covers design in parts 4a) and 4b) of the policy. Part 4a) requires a masterplan and design code for the whole site. The Council proposes to remove part 4a) and simply retain part 4b) which already requires a high standard and quality of design. On reflection the Council considers requiring a masterplan and design code for the whole site could be unnecessarily restrictive as development may come forward on separate parcels at different times, and the requirement could delay proposals on small parts of the site unnecessarily. The following modification is proposed to part 4a) of the policy:
- a) ~~A masterplan and design code for the whole site should be prepared, submitted and approved as part of a site-wide planning application, to ensure that all future development at Lakeside is brought forward in a holistic manner;~~

Associated changes are also proposed to paragraph 4.70:

~~All development proposals for this strategic site should form part of a masterplan, which should include a design code to be agreed in writing by the local planning authority.~~ It is important that the new business premises complement the existing buildings and enhance Portsmouth's premier office location in accordance with Core Policy PLP1.

- 7.4.5 PLP6: Portsmouth City Centre requires comprehensive development in part 1 of the policy, a design code at part 2j) and comprehensive redevelopment of City Centre North at Part 3. The Council proposes changes to parts 1 and 2j) but intends to retain the reference to comprehensive development in part 3. The City Centre North part of the allocation is a Council-owned site, and is large in scale, thus it is considered appropriate for development of this part of the allocation to be comprehensive. The change proposed to part 1 of the policy are as follows:
- 1. Portsmouth City Centre, as shown on the Policies Map, is allocated for the ~~comprehensive~~ mixed-use development of the following uses:

The change proposed to part 2j) is as follows:

j) Proposals for Major Development should demonstrate how its design enhances the Centre's appearance, responds positively to its heritage significance and considers the needs and safety of all its users including reducing crime, through the provision of a ~~design code~~ design and access statement;

7.4.6 An associated change is proposed to the supporting text at paragraph A81 as follows:

Major Development in the City Centre should demonstrate how its design enhances the Centre's appearance and considers the needs of all its users, through the provision of a ~~design code~~ design and access statement.

7.4.7 PLP11: Port Solent requires a conceptual framework masterplan in part 2a) of the policy and a framework masterplan and design code in part 2b). This is a Council-owned site and is being promoted by a single developer, for a large scale development, so the retention of the design code requirement and concept framework masterplan is considered appropriate. However, as there appears to be inconsistency regarding the concept framework masterplan and framework masterplan between parts 2a) and 2b) it is proposed that these are modified to be consistent as follows:

- a) Provide a conceptual framework masterplan as part of any planning application to ensure development of the highest quality that responds positively to the existing character and land uses and presents a layout of improved access arrangements;
- b) Provide high quality designed buildings to complement, in design and scale, the existing built form. All development proposals for this site must form part of a conceptual framework masterplan, alongside a site-wide design code to be agreed in writing by the Local Planning Authority.

7.4.8 PLP14: The News Centre originally proposed comprehensive development, but it was agreed with the promoters that the Council would remove this reference, and a modification was proposed prior to submission of the Plan (MM58 in the Main Modifications [PCC03]).

7.4.9 There are no requirements for design codes or comprehensive development at any of the other allocations.

5) **Has a consistent and proportionate approach been taken to the selection of the development requirements for each of the allocated sites?**

7.5.1 Yes, a consistent and proportionate approach was taken to the selection of the development requirements for each of the allocated sites. As a starting point the evidence base, in particular the individual site assessments in the Housing and Economic Land Availability Assessment (HELAA) [HO04], suggested the need for specific development requirements such as retention of trees or respecting the setting of a Scheduled Monument. Several evidence based studies informed other development requirements, for example the Level 2 Strategic Flood Risk Assessment (SFRA) [CE04 and b5] and the different iterations of the Strategic Transport Assessment (STA) [IN01 to IN05] were important in the formulation of development requirements relating to flooding and transport respectively. Specialists at the Council, for example built heritage officers in charge of the Historic Environment Record, were consulted on the emerging allocations and development requirements were added in line with their recommendations. External specialists at the statutory bodies were consulted on the emerging allocations, for example Natural England advised on biodiversity requirements. The development requirements were informed iteratively by formal consultation responses at Regulation 18 and 19, for example, feedback from the RSPB resulted to changes in development requirements on functionally linked land. The Sustainability Appraisal and Habitats Regulations Assessments were prepared iteratively alongside the emerging Plan and they also informed the development requirements. Finally, a number of allocation sites such as St John's College already have planning permission and the conditions applied to those planning permissions were used to inform the development requirements for those sites.

7.5.2 The supporting text for each allocation policy sets out further detail as necessary on the development requirements.

6) Has a consistent and proportionate approach been taken to the selection of milestones specified in the Monitoring and Delivery Framework for each of the allocated sites?

- 7.6.1 Yes, a consistent and proportionate approach has been taken to the selection of milestones specified in the Monitoring and Delivery Framework for each of the allocated sites. For sites that have been allocated for housing, the overall approach is for the milestones to align with the housing trajectory. In compiling the Housing Trajectory, the Council has made realistic assumptions about when housing is likely to come forward based on evidence from the HELAA [HO04], planning histories, and in some cases statements of common ground. Please note that modifications have been proposed to monitoring and delivery frameworks where necessary so that they are aligned with the latest housing trajectory. These include MM22, MM45 and MM69 in the Main Modifications [PCC03] as well as supplementary modifications [PCC15] documented in answers to questions for the relevant site allocations under this matter.
- 7.6.2 Milestones have also been provided for sites allocated for employment floorspace. These reflect realistic assumptions as to when the employment floorspace is likely to be delivered and are based on evidence from the HELAA Report and Appendices 2025 [HO04] and statements of common ground where applicable.
- 7.6.3 The milestones relating to infrastructure are set so that this is in place in time for other uses on site, such as housing, to come forward and be delivered in a timely manner. This also ensures the safety and ease of accessibility for pedestrians and/or future residents. For example, the sea defences at PLP4 Tipner East are anticipated to be completed prior to when dwellings are anticipated to be delivered. The timing of milestones are based on a realistic understanding of when these items can be delivered, with reference to the Infrastructure Delivery Plan [IN16].

PLP3: Tipner West

7) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular:

- a. Has the presence and significance of heritage assets, including the extent of their settings, been appropriately addressed in the policy?**
- b. Is there sufficient certainty that Primary Support Area P60 can be replaced by suitable Solent Wader and Brent Goose habitat elsewhere?**
- c. Have the potential implications of policies in the Hampshire Minerals and Waste Plan [EDP05] been taken into account, including those relating to safeguarding land and infrastructure?**

7.7.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference NE19. A constraints map is also provided with the site assessment. Section 5 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration of constraints.

7.7.2 Constraints which apply City-wide (nutrient neutrality and recreational disturbance to SPA bird species) are not flagged in the HELAA as generally on-site mitigation is not usually required because the Council has established schemes whereby developers pay contributions to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). However, bespoke policy requirements have been expressly set out under policy PLP3(3)(m,n) to ensure that a robust approach is adopted to mitigate such impacts arising from the proposed development at Tipner West, having regard to its significant scale and potential for likely significant effects outlined in the Habitats Regulations Assessment (HRA)[KD18]. In particular the following paragraphs from the HRA Appropriate Assessment address mitigation measures:

- 6.8-6.14 (recreational disturbance);

- 6.37-6.46 (loss of functionally linked habitat);
- 6.82 (construction disturbance);
- 6.94-6.115 (nutrient neutrality);
- 6.125 (atmospheric pollution);
- 6.157 (tall buildings and flight lines)
- 6.163-6.170 (coastal squeeze and the Shoreline Management Plan)

7.7.3 With regard to (a), yes, the policy has had particular regard to the presence and significance of heritage assets, including their settings. This is reflected in the requirements of PLP3(2)(c,d) and in particular PLP3(5) which requires developers to demonstrate a full understanding of heritage setting considerations and to avoid or mitigate any identified harms. Historic England have confirmed that they do not object to policy PLP3 (see Statement of Common Ground ref: SCG20).

7.7.4 In terms of (b), the Council is satisfied that there would be adequate mitigation available for the loss of the P60 Core Area of Solent Wader and Brent Goose functionally linked land. The Inspectors' attention is drawn to the HRA discussion on this matter as highlighted above (paragraphs 6.37-6.46). In addition, further detail on potential replacement habitat for P60 can be found in the detailed analysis of compensation sites forming part of Appendices C and D of the HRA Supplement (2024) [SS28], relating to the previous iteration of policy PLP3 in 2024. Appendix D comprised a due diligence assessment of 10 leading compensation site opportunities that had been under consideration by the PCC Promoter team for Tipner West. This includes land at Horsea Island East (circa 9ha), which is owned by PCC and available to mitigate for the loss of area P60 - see further details for this site (listed as site '01') in the table comprising Appendix C. The HRA Supplement concludes that:

" the LPA can have a high level of confidence that sufficient suitable land can be identified in appropriate locations to compensate for habitat losses from Portsmouth Harbour SPA/Ramsar site and Solent and Dorset Coast SPA due to delivery of Policy PLP3. There is also a high level of confidence this can be delivered in such a way that the compensatory areas will function as part of the North Solent network of European sites and thus preserve the coherence of the national site network." (para.5.1 of HRA Supplement 2024).

7.7.5 Furthermore, the HRA [KD18] for the current iteration of policy PLP3 directly addresses the issue of mitigation for core area P60 (para.6.40-6.44), highlighting the specific project-level requirements for developers under policy PLP3(6) and the controls provided through policy PLP42 (Solent Wader and Brent Goose Strategy). The HRA notes at 6.43 that the policy requires updated survey work to be undertaken by site promoters, to inform the detail of offsetting mitigation habitat and as such no specific site cannot be identified in advance of such survey and design work but that nevertheless, as noted in the work undertaken in 2024:

"...the site promoters have identified 110ha of land that is at least partially suitable for terrestrial habitat creation as functionally-linked land on sites that are available and have no competing claims of planning constraints. This is more than sufficient to offset the loss of area P60 (c.6.66ha)."

7.7.6 In answer to point (c), yes, the Council has had regard to the Hampshire Minerals and Waste Plan [EDP05]. The Hampshire Minerals and Waste Authority made representations to the first Regulation 19 Consultation (see p.291 of the Consultation Statement [KD34]) which led the Council to add a safeguarding infrastructure assessment requirement to policy PLP3 (now at PLP3(8)), with specific requirement upon site promoters to have regard to safeguarding identified in the adopted HMWP and its replacements. An updated HMWP (2026) [PCC26] was adopted in July 2026 in agreement with all Hampshire lower tier and Unitary authorities, including PCC.

8) **Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?**

7.8.1 Yes. The Tipner West Topic Paper [TP10] details the evolution of the Tipner West site allocation and in particular the options assessment process undertaken by the Council (see Chapter 4). The consideration of reasonable alternatives is also addressed in the Sustainability Appraisal report on the Local Plan Addendum [KD11], in particular paragraphs 3.6.7 and section 4.3 (assessment of Tipner West strategic site options). It is considered that these documents, alongside the HRA [KD18] provide a robust rationale for the extent of the developable area and site capacity for homes, taking into account site constraints.

9) **Does the policy set out appropriate development parameters and requirements? In particular, what is meant by the 'zone of visibility' identified in part 3(d) of the policy and is its spatial extent sufficiently clear?**

7.9.1 Yes, the policy is considered to set out appropriate development parameters and requirements. It has been the subject of extensive consultation as outlined in the Consultation Statement [KD34] and there are no outstanding or unresolved objections to the policy. The approach to be taken to development at Tipner West has been the subject of particularly detailed analysis not least in relation to the work associated with the request for a s.107(3) IROPI Opinion from the Secretary of State (MHCLG) aligned to the preceding iteration of policy PLP3 [see documents SS16, SS29]. In addition, the Tipner West Regulatory Panel has continued to meet regularly to discuss the emerging policy and associated statements of common ground [see compendium of Minutes at SS34].

7.9.2 With regard to the 'zone of visibility' this is not currently defined in the Plan and it does not appear in the NPPF. It typically relates to the process of Landscape and Visual Impact Assessment (LVIA) and is sometimes referred to as the 'zone of theoretical visibility' which is used to describe the area over which a development can theoretically be seen and further guidance is provided by the Landscape Institute's Guidelines on Landscape and Visual Impact Assessment (2013, 3rd Edition 2024). It is usually modelled digitally with regard to existing buildings, trees and open spaces but such zones of visibility are normally 'scoped' with input from both site promoters and the local planning authority at the project level. They also have value in heritage impact assessment where the parameters for such a zone may be extended or specifically targeted informed by professional judgement. It is not therefore appropriate to be more specific in terms of the extent of such a zone of visibility at this stage, as it is a matter to be assessed on a site by site basis at the project level.

10) **Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, the Tipner West Delivery Approach paper [SS35] indicates that there is a funding shortfall of around £107m for the development supported by the policy. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?**

7.10.1 Yes. As noted in the Tipner West Topic Paper [TP10] at 6.1, *"Proposals for Tipner West have consistently shown a significant financial deficit to varying extents. This is principally by reason of the cost of significant enabling works required namely the construction of sea defences, land raising for flood prevention and site decontamination."* This financial deficit has increased significantly following the receipt of the negative IROPI decisions (since withdrawn by Government as unlawful) and the Council's decision to amend the Tipner West policy to avoid any harms to SPA/Ramsar designated sites that cannot be mitigated - critically, removing land south of the firing range from the potential development zone and loss of circa 3.6ha of residential development revenue.

7.10.2 While the Council cannot therefore be certain that development will come forward as anticipated by the Plan, the Council considers there to be a realistic prospect that the funding gap can be closed. Discussions with Homes England and other strategic partners are progressing to close the funding gap (see 3.17-3.22 of the Tipner West Delivery Approach paper [SS35]) and there may also be funding available through the devolved Hampshire and the Solent Combined County

Authority (HSCCA) and Mayoral grant from April 2028. A meeting with Homes England, attended by representatives of both the PCC promoter team and PCC-LPA is scheduled for October this year to progress funding support.

11) Are the delivery assumptions regarding this site robust? In particular, have the following been taken into account:

- a. The delivery considerations set out in the Tipner West Delivery Approach paper, including the processes and timescales for securing delivery partners/disposal of the site, the need for vacant possession of the site, and the timescales for relocating The Harbour School and other existing uses where relevant?**
- b. The replacement of Primary Support Area P60 with suitable habitat elsewhere?**
- c. The potential need for replacement minerals and waste infrastructure?**

7.11.1 Yes, the delivery assumptions regarding the Tipner West site are considered to be robust.

- (a) As set out in the Tipner West Topic Paper [TP10], the Tipner West site has undergone significant project-level work since the City Deal award in 2013, including extensive and repeat site surveys, site masterplanning, sea defence designs, community engagement and consultation with statutory consultees not least through the Tipner West Regulatory Panel, although most of this project-level work related to site proposals involving reclamation and other direct losses from the SPA/Ramsar sites and preceded the receipt of the negative IROPI opinions from MHCLG (and preceding the current iteration of policy PLP3). Detailed project-level financial appraisals, including market analysis, have taken place over several years and have regularly been reported by the PCC Promoter team to Cabinet and Full Council (for example, see SS15, SS21 and SS24). The PCC promoter team has engaged at length with site lessees about relocation as noted in paragraphs 3.2-3.9 of the Delivery Approach paper and this was facilitated by securing full ownership of the site in January 2024. The Harbour School would require circa 3 years to be relocated off site, as set out at 3.8 of the Delivery Approach paper. Assuming broader funding can be secured through on-going discussions as discussed in the Council's answer to Q10, the Council is content with the delivery assumptions set out for policy PLP3.
- (b) The Council is confident that the loss of Primary Support Area P60 can be fully mitigated and refers the Inspectors to the Council's answer to Q7(b) in this regard.
- (c) The Council is confident that the potential need for replacement minerals and waste infrastructure has been addressed and refers the Inspectors to the Council's answer to Matter 7, Q7(c) in this regard.

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

7.12.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08] and the key SCGs for the allocation, being with Natural England [SCG27], Environment Agency [SCG25], Marine Management Organisation [SCG26], Defence Infrastructure Organisation [SCG24], Historic England [SCG20], RSPB & Hampshire and Isle of Wight Wildlife Trust (HIWWT) [SCG56] and PCC as site promoter [SCG49].

PLP4: Tipner East

13) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

7.13.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference NE18. A constraints map is also provided with the site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). Section 6 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration of constraints.

7.13.2 Whilst there are some constraints affecting the site, it has been demonstrated that these have been overcome and mitigation can be achieved via the planning applications for the site. Planning application 22/01292/FUL has planning permission, and application 21/01357/FUL has resolution to grant planning permission - together these cover the residential element of the site. The transport hub had planning permission which has now expired (22/00024/OUT), but the grant of this permission demonstrated that constraints could be overcome and mitigation achieved.

14) **Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?**

7.14.1 Yes, the site is currently under development pursuant to planning permission reference 22/01292/FUL and there is also a resolution to approve under reference 21/01357/FUL (anticipated to be issued in early Autumn this year). The Planning Committee reports for both provide a full and detailed assessment of the consideration of the site's opportunities and constraints and developable areas of the site. The site allocation is informed by these two planning applications and the Council is satisfied that the allocation makes optimal use of land as reflected by the positive Officer recommendations to Committee.

15) **Does the policy set out appropriate development parameters and requirements?**

7.15.1 Yes. The policy parameters have been informed by the above-mentioned planning applications and decisions. The residential quantum of 1,056 represents the combined number of dwellings to be delivered through the two developments. The commercial and community uses and flood defences set out in policy PLP4(1)(c) and (d) are being delivered under permission 22/01292/FUL (Vivid Homes). However, the multi-modal transport hub and 840m² ancillary commercial uses development parameter (PLP4(1)(b)) was informed by outline planning permission ref: 22/00024/OUT which has lapsed (see answer to Q17 below). The proposed transport hub development is to be the subject of a fresh application, but the policy parameter remains an important aspect of the Council's aspirations for the site and the Imagine Portsmouth 2040 Vision. It also reflects a development that has been the subject of detailed assessment and approval through a recent planning application and taken into account alongside the residential approvals referenced in the answer to Q14 above. As such, the retention of the parameter in the policy is considered to be appropriate.

7.15.2 A modification is proposed to 1b) of the policy to reflect the planning applications for the site and to be consistent with Table 4.3: Monitoring and Delivery Framework for Tipner East. Table 4.3 currently includes 716m² commercial floorspace which is not part of the policy, but needs to be added. A modification is therefore proposed as follows in the Schedule of Supplementary Modifications [PCC15]:

b) A new multi-modal transport hub with 716m² commercial floorspace and 840m² ancillary commercial uses;

7.15.3 As noted in the Council's answer to Q4, the Council has proposed changes to part 2a) of the policy, removing requirement for a site-wide masterplan and accompanying design code.

16) **Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?**

7.16.1 Yes, the 'Vivid Homes' development pursuant to planning permission 22/01292/FUL is being built out and is nearing Phase 2 of an 8-Phase development programme. The required site sea defences have already been installed as well as the primary road layout. The delivery timescales set out in Table 4.3 of the policy are considered to be soundly based, with the permission for the 'Bellway' site expected to be issued in early Autumn this year and commencement of works expected sometime in 2027. The Statement of Common Ground (SCG) with Bellway Homes &

Homes England [SCG37] dated September 2024 states that their part of the site is deliverable and viable with a reasonable prospect that the proposed development will come forward in line with the phasing set out in the SCG. No concerns have been raised in the SCG or in representations that the delivery of necessary infrastructure cannot be viably delivered at the point it is needed.

7.16.2 The only uncertainty relates to the delivery of the transport hub with the permission having now lapsed (see Q17).

17) **Are the delivery assumptions regarding the development of this site robust? In particular:**

a. Is the outline planning permission¹ for the transport hub extant and has progress been made on a reserved matters application? Do the permission, and any subsequent applications, have any implications for the delivery of the transport hub?

7.17.1 The outline planning permission for the transport hub (ref: 22/00024/OUT) expired on 6 July 2025. Prior to its expiry, work had taken place on elements of a reserved matters application and on identifying funding opportunities to support phased delivery of the approved scheme. For various reasons set out below, the Council has decided not to progress with the reserved matters application, and to instead prepare a revised planning application for a 'scaled-back' version of the transport hub.

7.17.2 Like many public transport operations, the existing Park & Ride service has experienced reduced patronage following the Covid-19 pandemic and subsequent changes in travel behaviour. This has required ongoing financial support from Portsmouth City Council while work has been undertaken to improve the scheme's operational and financial performance. As a result, resources have necessarily been focused on stabilising and improving the performance of the existing Park & Ride operation, with development of the longer-term Transport Hub proposal becoming a lower priority.

7.17.3 Recent measures, including rebranding, marketing initiatives and bus service retendering, have improved performance and customer numbers are forecast to exceed pre-pandemic levels during 2026, resulting in a substantially reduced operating deficit. These improvements provide a stronger platform for future development of the Transport Hub proposal.

7.17.4 Whilst the outline permission has lapsed, the strategic need for the Transport Hub remains unchanged. As set out in the Statement of Common Ground between the Local Planning Authority and Local Highway Authority [SCG42], the scheme responds to a number of long-term transport and regeneration challenges. Significant housing and population growth is planned in neighbouring authorities, including Havant, Fareham and Gosport, which will increase demand for travel into Portsmouth, particularly via the M275 corridor serving the City Centre.

7.17.5 Managing the impact of this growth is critical to addressing congestion, supporting air quality improvements within the Clean Air Zone, and reducing pressure on the City Centre highway network and parking supply. The latter is particularly important in enabling regeneration and redevelopment opportunities identified through policy PLP6: Portsmouth City Centre. Expansion of Park & Ride capacity through the proposed Transport Hub therefore remains one of the principal mechanisms available to the Local Highway Authority and Local Transport Authority to support sustainable access to the City and manage future travel demand.

7.17.6 This continuing need is reflected in a range of current Council policy documents, including Policy A of the Parking Strategy 2024 [PCC28] and Policy M of the Public Transport Strategy (2026) [PCC29] both of which support longer-term delivery of the Transport Hub. The Infrastructure Delivery Plan [IN16] identifies the Transport Hub (Scheme T45) as critical infrastructure required to support the Plan.

¹ Ref 22/00024/OUT

- 7.17.7 The Local Highway Authority and Local Transport Authority are currently undertaking work intended to inform a revised proposal and future planning application. This includes demand forecasting to determine the scale and form of future facilities required, taking account of post-pandemic travel patterns, planned development across Portsmouth and forecast future demand. The work is also assessing the requirements for a financially sustainable operation. The work is also assessing the requirements for a financially sustainable operation. The outcomes of this work will inform the infrastructure needed to support Portsmouth's transport, regeneration and modal shift objectives, together with a preferred approach to phasing, funding and delivery of future expansion of the existing Park & Ride facility.
- 7.17.8 The Local Plan allocations are expected to strengthen the case for future expansion of the Park & Ride and Transport Hub. In particular, the existing park & Ride bus service will be a key transport link for residents of the Tipner East allocation, creating additional patronage and supporting the long-term viability of the service. Given the scale of planned residential development and the emphasis on sustainable and lower-car travel patterns, this is expected to generate meaningful additional demand.
- 7.17.9 The Transport Hub also has an important role in supporting delivery of PLP6: Portsmouth City Centre. An expanded Park & Ride offer would help reduce the need for City Centre parking, support lower parking provision, and facilitate redevelopment of land currently used for parking. In doing so, the scheme would provide a sustainable alternative for trips that might otherwise travel directly into the City Centre by car. The relationship between the Transport Hub and PLP6 is reflected elsewhere in the Council's answer to Q25b).
- 7.17.10 Whilst it has not yet been determined when a fresh application will be submitted to redevelop the existing Park & Ride facility, it is important that policy PLP4 continues to express clear support for this development to support the timescales outlined in Table 4.3. These timescales remain feasible at the current time. The lapsed permission would be a material consideration in supporting similar proposals that come forward in the next few years.

b. Is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?

- 7.17.11 Yes, the site is already under construction pursuant to planning permission 22/01292/FUL and it is anticipated that the 'Bellway' permission will be issued in early Autumn, whereupon delivery is anticipated to commence in 2027, thereby aligning with the definition in the Framework.
- 18) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**
- 7.18.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08] the SCG with Bellway Homes/Homes England [SCG37], the Parking Strategy 2024 [PCC29] and Public Transport Strategy (2026) [PCC29].

PLP5: Lakeside North Harbour

- 19) **Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?**
- 7.19.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference COS10. A constraints map is also provided with the site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). Section 7 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration of constraints.

20) Would the site allocation make optimal use of land?

7.20.1 Yes, the site allocation would make optimal use of land at Lakeside. Paragraph 4.56 of the Plan states that 'Lakeside covers more than fifty hectares of land. One of its greatest assets is its parkland setting with a sizeable lake to the rear of the main buildings from which its name is derived.' The proposed allocation seeks to increase the density of the business park without detracting from its parkland setting or impacting adversely on its biodiversity value. Paragraph 4.63 of the Plan states that 'the majority of the allocation would be through the intensification of the site with the re-development of a proportion of the extensive surface level car parking.'

21) Does the policy set out appropriate development parameters and requirements?

7.21.1 Yes, the policy sets out appropriate development parameters and requirements. The planning history for HELAA site COS10 references the outline permission that was part implemented (08/02342/OUT) for 69,030 sqm of commercial floorspace including offices, a hotel and private hospital. An approximation of the non-implemented part of the permission was carried forward to the allocation of 50,000 m² of new office floorspace. The site promoter has agreed the quantum of employment growth and its phasing in the Statement of Common Ground [SCG34].

7.21.2 The development requirements are appropriate and evidence based relating principally to biodiversity, flooding and transport as evidenced in the Habitat Regulations Assessment [KD18], the SFRA level 2 [CEO04a and b] and the Strategic Transport Assessment [IN05] respectively.

7.21.3 As noted in the Council's answer to Q.4, the Council has proposed changes to part 4a) of the policy, removing requirement for a design code and site wide planning application.

22) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework? In particular:

a. Have the timescales and costs of delivering a new secondary access from Western Road been considered in determining when the employment floorspace may be delivered?

7.22.1 The provision of a secondary access is considered in section 5.10 of the STA Addendum [IN05]. It proposes mitigation in paragraph 5.10.10 as follows: 'The addition of a secondary access to the northwest of the Lakeside development site as per the principle set out in the outline planning application 16/00416/FUL. This will be left turn exit/ entry only.' The principle of the secondary access was established on the grant of permission. The Council as the local planning authority and the local highway authority would expect to secure what is a relatively modest scheme by condition or through a section 106 legal agreement with the promoter. It would not therefore be subject to an external funding bid.

7.22.2 Table 4.4 of the Plan forming the Monitoring and Delivery Framework for Lakeside and Appendix 4 of the HELAA states that the allocation will come forward in years 11 to 15 of the plan period. Paragraph 3.9 of the Statement of Common Ground between the Council as local planning authority and the Council as site promoter [SCG34] states that 'PCC Property has not carried out any further technical work yet for a secondary access, because the development is not expected to come forward until the latter part of the Plan period. PCC Property will commission the necessary work prior to submitting the planning application for the new employment floorspace.'

b. Have the timescales and costs of delivering improvements in relation to the Portsbridge Roundabout been taken into account, including the potential need for microsimulation modelling as indicated in the Statement of Common Ground ('SoCG') with National Highways [SCG28]?

- 7.22.3 Yes, there is sufficient certainty that any Portsbridge Roundabout mitigation required to support Local Plan development is feasible and can be delivered at the point it is needed.
- 7.22.4 The proposed Portsbridge mitigation comprises partial signalisation of the A27 Western Road and A397 Northern Road arms, with the A27 westbound off-slip and A3 London Road remaining unsignalised. National Highways have: stated that they have no objection at plan level to the principle of a mitigation scheme at Portsbridge Roundabout; acknowledged that improvements may be required for the local road network rather than the Strategic Road Network; and agreed that further assessment would be undertaken at project level to confirm the final scheme form. In relation to timing, the trigger-point testing has been undertaken to identify when this specific mitigation would be required to support Local Plan growth. Interim assessments are undertaken for 2030 and 2035 using Local Plan development trajectories to establish the likely timing of intervention and inform the Infrastructure Delivery Plan [IN16] and the policy's Monitoring and Delivery Framework. Based on current evidence, improvements are not expected to be required until after 2030 and are likely to be needed around 2035, by which time significantly more vehicle trips associated with the Local Plan allocations are expected to route through the junction.
- 7.22.5 The Statement of Common Ground with National Highways [SCG28] records that microsimulation modelling will be required at the project design stage to demonstrate deliverability and optimise the final scheme design. However, it also states that National Highways are not reliant upon this work at the plan-making stage and are content for it to be undertaken following Local Plan adoption. The Technical Note and subsequent discussions with National Highways reaffirm that microsimulation modelling, updated traffic surveys, and any assessment of interactions with adjacent junctions are project-level requirements that will be commissioned as the scheme progresses towards delivery.

23) Are the delivery assumptions regarding the development of this site robust?

- 7.23.1 Yes, the delivery assumptions are robust. As explained in paragraph 4.58 of the Plan and paragraph 13.38 of the Housing and Economic Development Needs Assessment (HEDNA) [HO01] an expanded Lakeside would offer high quality, modern space, which meets the demand caused by the recent 'flight to quality' trend. The site promoter has agreed the quantum and the phasing of the allocation in the Statement of Common Ground [SCG34], but states in paragraph 3.4 that they do not have any plans to submit a planning application at the current time and therefore does not currently have evidence on deliverability and viability.

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

- 7.24.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08], HEDNA [HO01], Infrastructure Delivery Plan [IN16], Strategic Transport Assessment [IN05], the Habitats Regulations Assessment [KD18], and the SCG with the site promoter [SCG34].

PLP6: Portsmouth City Centre

25) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular:

- a. Has the presence and significance of heritage assets, including the extent of their settings, been appropriately addressed in the policy?
- b. The SoCG with the Highway Authority [SCG17] indicates that further transport modelling and design work may be required to modify a road project associated with the City Centre North scheme², and that the road project relies on the transport hub at Tipner East to mitigate potential highway impacts. In that context, can the scheme come forward without unacceptable impacts on highway safety or severe residual cumulative impacts on the road network?

² Ref 22/01243/CS3, which is subject to a resolution to grant permission

7.25.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes multiple site assessments which together make up this allocation. These are listed below along with their site references:

- CD16 Matalan Outlet and Car Park;
- CD17 City Centre North;
- CD18 Debenhams, Commercial Road;
- CD22 30 Arundel Street;
- CD25 Portsmouth Mail Centre;
- CD26 Land adjacent Catherine House;
- CD28 2-10 Edinburgh Road;
- CD30 41-47 Arundel Street;
- CD31 194-198 Commercial Road;
- CD32 200-204 Commercial Road;
- CD34 Tesco/NCP Crasswell Street;
- CD36 12-28 Arundel Street;
- CD37 Arundel Street, Shopmobility;
- CD50 Greggs-Nationwide, Commercial Road.

7.25.2 A constraints map is provided with each HELAA site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). Section 8 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration constraints.

7.25.3 At CD16 Matalan Outlet and Car Park, the HELAA constraints map shows no constraints on site, but there are some listed buildings adjacent (Portsmouth and Southsea Station) and nearby, and the Victoria Park Registered Park and Garden and Conservation Area is also located nearby. Impacts on heritage constraints can be mitigated through good design and through heritage being covered in policy PLP6. Part of the site now has planning permission for new offices, so constraints for that part of the site have been addressed through the planning application process (ref. 24/00837/FUL). Due to changing circumstances this site is no longer contributing towards housing or employment development in this allocation as it is now proposed to be redeveloped for a supermarket.

7.25.4 At CD17 City Centre North, the HELAA constraints map shows that there is an Air Quality Monitoring Area (AQMA) within the site, as well as a listed building, with other listed buildings nearby. The AQMA is to be addressed through policy PLP6, and impacts on listed buildings can be mitigated via good design, and through heritage being covered in policy PLP6. Constraints have been taken into account in the planning application for the site which has resolution to grant planning permission (ref. 22/01243/CS3).

7.25.5 At CD18 Debenhams, Commercial Road, the HELAA constraints map shows some constraints including nearby listed buildings, and Victoria Park Registered Park and Garden and Conservation Area, but this site now has planning permission, so these have been addressed through the planning application process (ref. 24/00650/OUT).

7.25.6 There is no HELAA constraints map for CD22 30 Arundel Street in the 2025 HELAA because the site has planning permission, so constraints have been taken into account through the planning application process (ref. 24/00001/PACOU).

7.25.7 At CD25 Portsmouth Mail Centre, the HELAA constraints map shows some constraints including nearby listed buildings, and Victoria Park Registered Park and Garden and Conservation Area, but this site now has planning permission, so these have been addressed through the planning application process (ref. 24/01246/FUL).

7.25.8 At CD26 Land adjacent Catherine House, the HELAA constraints map shows no constraints on site, but there are listed buildings nearby, as well as the Victoria Park Registered Park and

Garden and Conservation Area. Constraints have been taken into account though the planning application process as this site has resolution to grant planning permission (17/01807/FUL).

- 7.25.9 At CD28 2-10 Edinburgh Road, the HELAA constraints map indicates that there are no constraints on site, but there are some listed buildings nearby, and the Victoria Park Registered Park and Garden and Conservation Area is also nearby. Heritage constraints can be addressed via good design and through heritage being covered in policy PLP6.
- 7.25.10 At CD30 41-47 Arundel Street, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.25.11 At CD31 194-198 Commercial Road, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.25.12 At CD32 200-204 Commercial Road, the HELAA constraints map shows that there are no significant constraints affecting the site. This site is no longer proposed to contribute towards meeting the housing requirement for this allocation, see the Council's answer to Question 28)b for further information.
- 7.25.13 At CD34 Tesco/NCP Crasswell Street, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.25.14 At CD36 12-28 Arundel Street, the HELAA constraints map shows that there are no significant constraints affecting the site. Constraints have also been taken into account through the planning application process as this site has planning permission (ref. 20/01464/FUL).
- 7.25.15 At CD37 Arundel Street, Shopmobility, the HELAA constraints map shows that there are no significant constraints affecting the site. Constraints were also addressed through the planning application granted for the site, but this has now lapsed (ref. 19/01919/CS3).
- 7.25.16 At CD50 Greggs-Nationwide, Commercial Road, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.25.17 A further site is proposed to be added to this allocation post-submission, which is to be added to the next iteration of the HELAA under reference CD94 Barkis & Nickleby. A separate topic paper [PCC16] has been prepared for this site along with another parcel and this includes a proforma for site CD94 Barkis & Nickleby, as well as a constraints map, showing what constraints affect the site. The constraints map shows there are no on-site constraints, but there are listed buildings nearby. Heritage constraints can be addressed via good design and through heritage being covered in policy PLP6.

a. Has the presence and significance of heritage assets, including the extent of their settings, been appropriately addressed in the policy?

- 7.25.18 Yes, the Council acknowledges that heritage constraints affect a number of the HELAA sites making up the PLP6 allocation, and as such the policy has included elements to address this. Part 2)) of the policy requires proposals for Major Development to demonstrate how their design would respond positively to the presence and significance of its heritage assets within and around the City centre. Reference is also made to heritage assets in parts 3), 4), 5) and 6) of the policy which cover the four different areas the allocation is divided into. Further references to heritage assets are made in the supporting text, notably paragraphs A84, A85, A91, A92, A94, A95, A98, and A99. Heritage assets are also referenced in the introductory text to the policy at paragraph A62.
- 7.25.19 Some changes have been made to policy PLP6 over time, in response to representations from Historic England, as documented in the SoCG with them [SCG20]. The Council considers the policy to satisfactorily address the presence, significance and setting of heritage assets in the City Centre, but the Council's SoCG with Historic England notes that there remains limited disagreement in this regard.

- b. The SoCG with the Highway Authority [SCG17] indicates that further transport modelling and design work may be required to modify a road project associated with the City Centre North scheme³, and that the road project relies on the transport hub at Tipner East to mitigate potential highway impacts. In that context, can the scheme come forward without unacceptable impacts on highway safety or severe residual cumulative impacts on the road network?**

- 7.25.20 The City Centre Road (CCR) scheme is required to maximise the development potential of the City Centre North site which forms part of the PLP6: Portsmouth City Centre allocation. The current highway layout divides the area into several separate parcels, causing severance within the City Centre. The scheme is dependent on external funding; it has been identified by Department for Transport (DfT) as a candidate Major Road Network (MRN) scheme and the Council is also pursuing alternative funding opportunities, including the National Highways Growth & Housing Accelerator Fund. Further modelling and design work is required to support the Council's bids for external funding.
- 7.25.21 A DfT-compliant business case process is required to secure funding. A Strategic Outline Business Case (SOBC) was submitted in summer 2026. The economic assessment indicates a central case Benefit Cost Ratio (BCR) of 0.6 for direct transport benefits, increasing to 1.7 when wider economic benefits such as land value uplift are included. Sensitivity testing incorporating design refinements and junction optimisation indicates the BCR could increase further (to 1.4 - 2.6), placing the scheme within DfT/Treasury's medium to high value for money category.
- 7.25.22 Further work will be required through the next stage of business case development (developing an Outline Business Case and then Full Business Case). This will include more detailed transport, economic, environmental and social modelling, together with refinement of the scheme design and testing under a range of future scenarios. Consultants have already been commissioned to support this work, and preparatory appraisal activities are in progress.
- 7.25.23 The primary purpose of the CCR scheme is not to create significant additional highway capacity but to relocate existing capacity to reduce severance of the City Centre North site. The scheme broadly maintains existing traffic capacity while using released highway space to provide continuous bus priority, cycling facilities and improved pedestrian connections.
- 7.25.24 This reflects the Council's policy approach in the Local Transport Plan 4 (LTP4) 2021-2040 [IN08] which prioritises sustainable transport and aligns with the vision-led approach promoted by Policy TR1 of the new 2026 NPPF. However, this also presents challenges when modelling future performance, as a network with only modest increases in general traffic capacity must accommodate demand associated with substantial new development.
- 7.25.25 Whilst the 2041 "do something" model scenario in the STA [IN05] forecasts some modal shift and a modest reduction in traffic demand, it also identifies significant delays and queueing on some parts of the CCR scheme. The Local Highway Authority's position in the Statement of Common Ground (SoCG) [SCG17] remains unchanged in that it is not yet satisfied that the current evidence conclusively demonstrates that the CCR scheme can avoid severe residual highway impacts or adverse effects on air quality. However, Policy PLP6 provides an important safeguard. Paragraph A76 states that 'Proposals for the City Centre Road Scheme and those such as City Centre North that propose revised road layouts should ensure that these improve and do not worsen air quality.' Demonstrating compliance with this requirement through future scheme development and business case stages will be important in addressing the LHA's concerns.
- 7.25.26 It is also worth noting that the STA represents a relatively conservative assessment of future conditions. The 2041 Local Plan modelling assumed no significant enhancements to the existing Tipner Park & Ride (see pages 10-11 and 18 of the STA Appendices [IN03b]) and did not directly account for the wider effects of future investment in public transport, active travel and

³ Ref 22/01243/CS3, which is subject to a resolution to grant permission

other measures promoted through LTP4, beyond those already committed and the bus priority included in the CCR scheme itself.

7.25.27 By contrast, modelling undertaken for the CCR scheme business case, and previously for the City Centre North planning application (22/01243/CS3), incorporated greater levels of modal shift and reduced car dependency. The modelling assumed expansion of the Tipner Park & Ride/Transport Hub (intercepting 1.5% of suitable trips on the M275). In total, these assumptions generated an approximate 7% reduction in highway traffic across the network by 2038.

7.25.28 Under these assumptions, the CCR scheme performs more acceptably than in the Plan's STA scenarios. The SoCG [SCG17] cites the difference between these model forecasts (paragraphs 2.10-2.14). The STA Addendum [IN05] also covers the design changes that exist between the CCR SOBC and previous strategic modelling in the STA, and parking assumptions.

7.25.29 These results indicate that a credible pathway exists for the CCR scheme to be delivered without unacceptable impacts, provided that the wider package of transport interventions set out in LTP4 is successfully implemented. In particular, delivery measures that support modal shift, appears likely to be important in achieving acceptable highway and environmental outcomes.

26) Would the site allocation make optimal use of land and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular:

a. How have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?

7.26.1 The opportunities and constraints for each of the HELAA sites within the Portsmouth City Centre allocation are documented in the HELAA Report and Appendices 2025 [HO04]. Key constraints for each HELAA site are flagged in section 8 of the Allocations Topic Paper [TP08]. Further information is provided in the Council's answer to Question 8 of the Inspectors' Initial Question (IQR) [PCC06]. A summary of the information is provided below, taking each HELAA site proposed to be included in the allocation in turn.

7.26.2 CD16 Matalan Outlet and Car Park was originally proposed for a mix of housing and employment uses but is no longer available for housing as this parcel is now coming forward for a supermarket.

7.26.3 CD17 City Centre North has been subject to a planning application which has resolution to grant under application reference 22/01243/CS3. The site's opportunities and constraints were taken into account in that application. However, the site capacity has changed since the resolution to grant was issued, as documented in the Council's IQR answer to Question 11a. The Building Safety Act has viability implications for buildings above 18m, which has impacted on proposals for the site. The Council still aspires to deliver 2,300 homes at the site, but viability concerns have led to proposals being revisited, reducing the height of some of the proposed buildings, which reduces the figure to 1,600 homes.

7.26.4 CD18 Debenhams, Commercial Road has resolution to grant planning permission (ref. 24/00650/OUT), and the site's opportunities and constraints have been taken into account in determining that application which has resulted in the figure of 569 apartments.

7.26.5 CD22 30 Arundel Street has planning permission (ref. 24/00001/PACOU). The planning application considered opportunities and constraints, including the fact this was a conversion of an existing building, resulting in a figure of 5 dwellings.

7.26.6 CD25 Portsmouth Mail Centre has planning permission (ref. 24/01245/FUL). The planning application considered opportunities and constraints resulting in a figure of 102 dwellings.

7.26.7 CD26 Land adjacent Catherine's House has resolution to grant planning permission (ref. 17/01807/FUL). The planning application considered opportunities and constraints, resulting in a figure of 147 dwellings.

- 7.26.8 CD28 2-10 Edinburgh Road is estimated to deliver 20 dwellings. The HELAA constraints map indicates that there are no major constraints affecting the site, though the presence of nearby listed buildings will need to be taken into account. Whilst the site is in an opportunity area for tall buildings, the development is likely to involve conversion of an existing building, so there is limited scope to provide tall buildings. This is because this site is a building which is part of an existing row of buildings with shops on the ground floor and two storeys above the shops, so demolishing the building and replacing with a taller development would be inappropriate. Professional judgement has been used to estimate that 20 dwellings could be accommodated in the two storeys above the shops.
- 7.26.9 CD30 41-47 Arundel Street is estimated to deliver 40 dwellings. The HELAA constraints map indicates that there are no major constraints affecting the site, and the site proforma indicates that the site is in an opportunity area for tall buildings. As noted in paragraph 8.99 of the IQR [PCC06], professional judgement involved considering the fact the existing building is two storeys, and taking into account the City Centre location, and existing surrounding buildings being 2-3 storeys in height, there may be some limited scope to increase the height of the building through redevelopment by one or two storeys, but a very tall building is not envisaged, meaning that 40 dwellings is considered an appropriate figure for the site.
- 7.26.10 CD31 194-198 Commercial Road is estimated to deliver 80 dwellings. The HELAA constraints map indicates that there are no major constraints affecting the site, and the site proforma indicates that the site is in an opportunity area for tall buildings. As noted in paragraph 8.109 of the IQR, professional judgement involved considering the fact that the existing 3-storey building is likely to be converted rather than demolished and rebuilt, with the potential for a limited number of additional storeys added. Professional judgement along with discussions with the landowner resulted in the housing figure of 80 dwellings.
- 7.26.11 CD32 200-204 Commercial Road is estimated to deliver 40 dwellings. The HELAA constraints map indicates that there are no major constraints affecting the site, and the site proforma indicates that the site is in an opportunity area for tall buildings. As noted in paragraph 8.119 of the IQR, the number of homes for this site is based on professional judgement and discussions with landowners. The development would most likely involve converting the existing building as this is one end of a row of shops, but as noted in paragraph 8.127 of the IQR, the landowner has flagged that there would be potential for more dwellings if the site could come forward with the adjacent HELAA site at 194-198 Commercial Road. This site is now not considered likely to deliver housing towards the policy requirement for this site, so the figure for this site has been amended to 0. See the Council's answer to Q28)a. for further information.
- 7.26.12 CD34 Tesco/NCP is estimated to deliver 160 dwellings. The HELAA constraints map indicates that there are no major constraints affecting the site, and the site proforma indicates that the site is in an opportunity area for tall buildings. As noted in paragraph 8.129 of the IQR, the number of homes for this site has been based on the HELAA (2023) [HO08] and professional judgement.
- 7.26.13 CD36 12-28 Arundel Street previously had planning permission for student bed accommodation of 598 beds, which equates to a C3 equivalent of 249 dwellings (having applied a ratio of 2.4). Whilst the permission (20/01464/FUL) has now lapsed, constraints were taken into account in the planning application process, and the figure of 249 C3 dwellings equivalent was considered appropriate.
- 7.26.14 CD37 Arundel Street, Shopmobility previously had planning permission for 76 dwellings. Whilst the permission (19/01919/CS3) has now lapsed, constraints were taken into account in the planning application process, and the figure of 76 dwellings was considered appropriate.
- 7.26.15 CD50 Greggs-Nationwide is estimated to deliver 70 dwellings. The HELAA constraints map indicated that there are no significant constraints affecting the site, and the site proforma indicates that the site is within an opportunity area for tall buildings. As noted in paragraph 8.158 of the IQR, the number of homes for this site is based on professional judgement.

7.26.16 The additional site proposed to be added to the PLP6 allocation - CD94 Barkis & Nickleby is considered in a new Topic Paper [PCC16]. This includes the equivalent of a HELAA assessment for the site in Appendix 3, which includes a constraints map showing there are no constraints on-site, but there are listed buildings nearby. The Design Options document (see Appendix 2 of the Topic Paper) which has informed the proposals at Barkis House and Nickleby House includes a review of site constraints and sets out the reasoning behind the proposals being for 524 dwellings (following demolition of the 272 existing) dwellings, a net addition of 252 dwellings.

7.26.17 A number of modifications have been proposed to policy PLP6 and the supporting text relating to changes in the housing numbers and employment figures for this site. These are numerous and so have not been shown here, but can be seen in the Schedule of Supplementary Modifications [PCC15].

b. Is the Plan positively prepared and justified in taking forward 1600 homes as a lower limit in the context the City Centre North scheme being supported for 2300 homes?

7.26.18 Yes, as noted in the Council's answer to question 26)a) the scheme proposed under the planning application 22/01243/CS3 which has resolution to grant planning permission has had to be revisited on viability grounds, largely due to the Building Safety Act having significant viability impacts on buildings over 18m. Proposals are now for buildings of a reduced height, which reduces the figure to 1,600 homes. The Council still has an aspiration to deliver 2,300 homes, but viability issues currently mean that 1,600 homes is a more realistic figure. The lower end of the range comes from a report prepared by Mace on behalf of the PCC promoter team which is appended to the SoCG with the site promoters [SCG51] as noted in paragraph 8.39 of the IQR [PCC06].

27) **Does the policy set out appropriate development parameters and requirements? In particular, are all the intended requirements for the different sites within the City Centre set out in the supporting text accurately reflected in the policy?**

7.27.1 Yes, the policy sets out appropriate development parameters and requirements. Parts 1 and 2 of the policy relate to all sites, and parts 3-6 each relates to sites within one of the four areas the Portsmouth City Centre allocation is divided into. Figure 4.5, along with the supporting text for the policy and the Allocations Topic Paper [TP08] make clear which area each of the HELAA sites making up the allocation sits within.

7.27.2 As noted in the Council's answer to Q4, the Council proposes modifications to parts 1, and 2j) of the policy to remove reference to comprehensive development, and the requirement for a design code.

28) **Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular:**

- a. **Is it sufficiently clear when the City Centre North road project and the Tipner East transport hub need to be completed and has this been taken into account in determining when housing may be delivered?**
- b. **The SoCG with the landowner of 200-204 Commercial Road [SCG30] indicates that there is no evidence to support the delivery of development there, and that this would depend on its future viability. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?**
- c. **Table 19.1 of the IQR indicates that the best-fit development typologies from the Development Viability Assessment (DVA) [HO15] for several sites within the city centre allocation would be unviable. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?**

- 7.28.1 Changes are proposed to Table 4.5: Monitoring and Delivery Framework for Portsmouth City Centre and to the Housing Trajectory to reflect various changes in circumstance which have occurred since the Plan was submitted, however as set out below there is sufficient certainty that each development parcel would be viable. The phasing of each site is set out in Tables 7 and 8 of the Allocations Topic Paper [TP08], but where there are proposed changes to this this is flagged below.
- 7.28.2 At CD16 Matalan Outlet and Car Park, a modification is being proposed to remove the housing and employment from this site as it is now proposed to be redeveloped for a supermarket under pending application 26/00596/FUL. This means that 300 dwellings and 8,000sqm of employment floorspace are proposed to be removed from allocation PLP6.
- 7.28.3 At CD17 City Centre North the Statement of Common Ground (SoCG) with the site promoters [SCG51] dated March 2026 states at paragraph 3.6 that PCC as Site Promoter agrees that the site is deliverable and viable, with a reasonable prospect that the proposed development will come forward in line with the phasing set out in the SoCG. Whilst the SoCG shows the range of 1,600-2,300 units, the lower end of this range is used in the Housing Trajectory. No changes are proposed to the numbers or phasing for this site as set out in the Allocations Topic Paper and the Housing Trajectory. As noted in the housing land supply template for this site in the Council's answer to Question 15 from the Inspector's Initial Questions (IQR) [PCC06], the Council has begun the process of selecting a Master Developer, and further evidence on the deliverability and viability of the site is available in the City Centre Development Strategy [SS36] and City Centre North Cabinet Report, including Appendices A and D [SS38a-SS38c].
- 7.28.4 At CD18 Debenhams, Commercial Road, the deliverability and viability of the site is demonstrated by the pending planning application for the site which has resolution to grant planning permission (ref. 24/00650/OUT). A change is proposed relating to this site due to a change made to the pending application. Originally the scheme was for 569 apartments, but this has been amended to 366 apartments and 358 co-living residential units (Sui Generis use). To calculate the C3 equivalent for the co-living element, a ratio of 1.9 is applied, resulting in an overall figure for the site of 554 dwellings. As the resolution to grant is quite recent (18/03/2026) it is assumed the scheme is deliverable and viable. The fact that the application is in outline has been taken into account in the revised phasing for this site in the Housing Trajectory.
- 7.28.5 At CD22 30 Arundel Street, the deliverability and viability of the site is demonstrated by the planning approval being granted 26/02/2024 (ref. 24/00001/PACOU), no changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.6 At CD25 Portsmouth Mail Centre, the deliverability and viability of the site is demonstrated by the planning permission for the site granted 23/12/2025 (ref. 24/01246/FUL). This is also confirmed in the SoCG with the site promoters Slindon Street Portsmouth Ltd [SCG29]. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.7 At CD26 Land adjacent Catherine's House, the deliverability and viability of the site is demonstrated through the planning application for the site which has resolution to grant planning permission (ref. 17/01807/FUL). No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.8 At CD28 2-10 Edinburgh Road, the deliverability and viability of the site has been confirmed by the landowner confirming the site is available for development. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.9 At CD30 41-47 Arundel Street, the deliverability and viability of the site has been confirmed by the landowner confirming the site is available for development. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.

- 7.28.10 At CD31 194-198 Commercial Road, the deliverability and viability of the site is confirmed in paragraph 3.4 of the SoCG with the landowner FRG Properties Limited [SCG50] dated March 2026 which also confirms the phasing. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.11 At CD32 200-204 Commercial Road is addressed under part b. of this question. As deliverability and viability of the site cannot be confirmed, the dwellings proposed for this site have been removed from the Housing Trajectory and the Monitoring Delivery Framework.
- 7.28.12 At CD34 Tesco/NCP the deliverability and viability of the site has been confirmed by the landowner confirming the site is available for development. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.13 At CD36 12-28 Arundel Street the deliverability and viability of the site is demonstrated through the planning application for the site (though this has lapsed - ref/ 20/01464/FUL) and the landowner confirming the site is available for development. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.14 At CD37 Arundel Street, Shopmobility the deliverability and viability of the site is demonstrated through the SoCG with the site promoter (the Council) [SCG47]. Paragraph 3.4 of the SoCG indicates that the site promoter agrees the site is deliverable and viable. The phasing of the site is also agreed. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.15 At CD50 Greggs-Nationwide the deliverability and viability of the site is demonstrated through the landowner confirming the site is available for development. No changes are proposed to the numbers or phasing shown in Table 7 of the Allocations Topic Paper or the Housing Trajectory.
- 7.28.16 The new site to be added to the allocation post-submission of the Plan - CD94 Barkis & Nickleby is discussed separately in the accompanying Topic Paper [PCC16]. The site is owned by the Council who need to redevelop the site for continued use for affordable housing, so this is assumed to be deliverable and viable.

a. Is it sufficiently clear when the City Centre North road project and the Tipner East transport hub need to be completed and has this been taken into account in determining when housing may be delivered?

- 7.28.17 As the City Centre Road (CCR) project is intended to enable a more optimal City Centre North development site, this scheme would need to be completed prior to the majority of development in the City Centre North area commencing. There is co-ordination between the proposed programme for the CCR scheme, and the Housing Trajectory as the updated Housing Trajectory indicates 550 dwellings will come forward in the first five years following adoption of the Plan, prior to or in parallel with anticipated delivery of the CCR scheme. As set out in planning application 22/01243/CS3, the first phase of City Centre North can come forwards prior to delivery of the CCR.
- 7.28.18 The CCR Strategic Outline Business Case anticipates a phased construction period mostly from 2027-2031. The housing trajectory anticipates the bulk of the City Centre North site (1,050 dwellings) would be delivered post 2032.
- 7.28.19 As explained in the Council's answer to Q.25b), the Tipner Transport Hub is one of several sustainable transport mitigations which are expected to benefit the operation of the CCR scheme. Ideally the Tipner Transport Hub scheme would be delivered in advance of works commencing on the CCR (extra Park & Ride capacity would help to mitigate some roadworks traffic disruption); if not delivered before works commence on the CCR, the Transport Hub scheme would be ideally delivered in the early 2030s in order to align with expected timescales for completion of the CCR scheme and commencement of development on the bulk of the City Centre North site.

- b. The SoCG with the landowner of 200-204 Commercial Road [SCG30] indicates that there is no evidence to support the delivery of development there, and that this would depend on its future viability. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?**

7.28.20 The Council proposes to remove the housing numbers for CD32 200-204 Commercial Road from the allocation. This is reflected in the updated Housing Trajectory and revised Monitoring and Delivery Framework.

- c. Table 19.1 of the IQR indicates that the best-fit development typologies from the Development Viability Assessment (DVA) [HO15] for several sites within the city centre allocation would be unviable. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?**

7.28.21 Yes, there is sufficient certainty that sites will come forward as anticipated by the Plan, as documented in the Council's answer to Question 19 of the Inspector's Initial Questions (IQR) [PCC06]. In addition to this, the Council would also like to highlight the contents of the Ministerial Letter to the Interim Chief Executive of the Planning Inspectorate of July 2026 [PCC27] which seeks to emphasise the importance of taking an appropriately pragmatic and proportionate approach in respect of deliverability and viability when examining local plans.

29) Are the delivery assumptions regarding the development of this site robust? In particular:

- a. Do the assumptions take into account securing a 'master developer' for City Centre North and its Programme and Milestones [SS38c] which, among other things, indicates the submission of a planning application in July 2027? What is that application anticipated to seek permission for?**

7.29.1 The City Centre North project team have recently appointed a master developer - Muse/ECF to execute a Development Management Services Agreement. This will produce a market-led business case for deliverability of the scheme. Following production of a successful business case the intention is to enter into a Development Agreement (DA) for ongoing delivery. Once this is entered into, the first planning applications will come forward for the various plots, as per the agreed business plan. Given this position, the Council is proposing amending the Housing Trajectory to push the start of completions back to 2029/30 rather than 2027/28.

- b. Is there clear evidence that completions would begin within 5 years of adopting the Plan, as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?**

7.29.2 Yes. The evidence to support this has been detailed below against each of the sites which form part of PLP6 that are anticipated to deliver housing within 5 years of adopting the Plan.

7.29.3 HELAA site CD17 City Centre North has resolution to grant planning permission (22/01243/CS3) but the Council's promoter team are now proposing preparing a revised planning application. Further detail is provided in the Council's answer to Q.20a) regarding the likely timing of the development. Additional support for the site from the Council's promoter team can be found in the SoCG [SCG51], the City Centre Development Strategy [SS39] and the City Centre North Regeneration Cabinet Report, including appendices A and D [SS38a-SS38c].

7.29.4 Site CD18 Debenhams secured resolution to grant planning permission (24/00650/OUT) on 18.03.2026 and therefore has been shown to start delivering 2028/29 of the Housing Trajectory. This assumes planning permission is granted in 2026, with reserved matters being granted and discharge of conditions taking place during 2026/27, so that construction can start in 2027/28 with some dwellings being completed in that year in 2028/29. The number of dwellings anticipated for the site has changed from 569 to 554 dwellings to reflect the revised figure from the planning application.

- 7.29.5 For, CD22 30 Arundel Street, please refer to paragraph 15.7 of the IQR [PCC06]. This site has planning permission for 5 units (24/00001/PACOU), and as it is a change of use consent, it is anticipated that the site will deliver early in the plan period, so it is shown as delivering in year 2027/28.
- 7.29.6 Site CD25 Portsmouth Mail Centre, was granted planning permission (24/01246/FUL) on 23.12.2025. The SoCG with the landowner [SCG29] agrees delivery will be in the period 2025-2030. Given the site has full planning permission, it is assumed this will deliver early in the plan period, so has been shown as delivering in 2027/28 on the Housing Trajectory.
- 7.29.7 For, CD26 Land adj Catherine's House, please refer to paragraph 15.9 of the IQR [PCC06]. The site has resolution to grant planning permission (17/01807/FUL). Time has been allowed for planning permission to be granted, and discharge of conditions, with the site shown as starting to deliver completions in 2031/32.
- 7.29.8 For CD30 41-47 Arundel Street, see paragraph 15.11 of the IQR [PCC06], the landowner has indicated that the site is available for development. There is a current lease on the site, but this expires in 2028. Therefore, delivery has been phased at the end of the five year period post adoption.
- 7.29.9 For CD31 194-198 Commercial Road, see paragraph 15.12 of the IQR [PCC06]. There is a SoCG with the landowner of the site [SCG50] which confirms delivery would be in the period 2030-35. The Housing Trajectory shows the site delivering in 2031/32, part way through that period.
- 7.29.10 When the Plan was submitted for examination, CD32 200-204 Commercial Road formed part of PLP6 and was anticipated to deliver housing within the first 5 years of adopting the Plan. However, the Council considers CD32 200-204 Commercial Road to no longer be deliverable (as defined by Annex 2 of the Framework). The Council proposes to remove the housing numbers for CD32 200-204 Commercial Road from the allocation. This is reflected in the updated Housing Trajectory and revised Monitoring and Delivery Framework.

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

- 7.30.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the HELAA 2023 [HO08], the Allocations Topic Paper [TP08], the LPS Tower Blocks Topic Paper [PCC16], the IQR [PCC06], and the various SoCGs [SCG20, SCG51, SCG29, SCG50, SCG47], and evidence relating to City Centre North [SS36 and SS38a-SS38c].

PLP7: Fratton Park & The Pompey Centre

31) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

- 7.31.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference MI02. A constraints map is provided with the site assessment, showing that the site has no significant constraints affecting it. Section 9 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration constraints. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]).
- 7.31.2 Specific to this site, it is noted in the HELAA assessment that the close proximity of Fratton railway station will help facilitate expansion of the existing football ground. Part 3 of policy PLP7 safeguards the land to provide an off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park as this is considered necessary to manage increased

numbers of pedestrians on match days following the expansion of the football stadium. The implementation of the new off-road pedestrian and cycle link is considered possible within land ownerships of the parties involved.

32) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?

7.32.1 Yes, the site allocation will make optimal use of land. The anticipated number of homes for the Fratton Park element of the site has been largely taken from master planning work carried out by the landowner of Portsmouth Football Club who employed architects to prepare these plans for them. Adding in the area safeguarded for a further 250 homes at the Pompey Centre this results in a site density of 56 dwellings per gross hectare. Whilst development can always be built taller and at a higher density, the character of the surrounding area, and the close proximity to the football stadium also has to be taken into account; very tall buildings immediately adjacent to the football stadium would not be considered appropriate.

33) Does the policy set out appropriate development parameters and requirements? In particular, is an off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park necessary, feasible and otherwise justified?

7.33.1 Yes, the policy sets out appropriate development parameters and requirements. The off-road pedestrian and cycle route is necessary and justified to support the proposed expansion of the Football Stadium as the existing road layout and location of the railway line currently prevent easy pedestrian movement and cycle movements to and throughout the site at busy times around football matches. The pedestrian and cycle route is not needed to allow the proposed housing to come forward. A stadium with increased capacity will obviously mean more pedestrians coming to football matches, which will exacerbate the existing issue. Responses to the Regulation 18 version of the Local Plan [PRE01] flagged concerns for how busy roads got (especially on match days) and the lack of cycle and walking facilities (see paragraph A2.416 of the Consultation Statement [KD34]). The proposed off-road route is supported by representations on the Plan by Network Rail and PCC as Local Highway Authority.

7.33.2 In terms of feasibility, feasibility assessment has been undertaken for the pedestrian and cycle route, but is still in draft form and so cannot be published. The reports also contain commercially sensitive information which is to be kept confidential. All parties involved with the allocation (the Council, Portsmouth Football Club, and RedevCo - the owners of the Pompey Centre) together with Network Rail have contributed towards the cost of the feasibility work, and the ownership of the land needed to provide the off-road link is all in the ownership of the four parties.

7.33.3 The first stage of the feasibility work involved working with Network Rail to establish the feasibility of a new bridge over the railway line to enable pedestrians to easily cross between platforms on different sides of the railway line. This stage of work has concluded that this is feasible, meaning that the next stage (stage 2) of feasibility work could continue, which involves linking the proposed new railway bridge to the Pompey Centre and Portsmouth Football Club. The stage 2 feasibility work has so far established that the pedestrian and cycle route is feasible to deliver, but whilst discussions between the parties are ongoing, the study cannot be finalised and published due to commercial sensitivities.

7.33.4 Whilst the feasibility study reports cannot be shared, the Council is able to reference a recent press article which discusses the joint working⁴. The Council has submitted this as evidence with these hearing statements [PCC18].

34) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to

⁴ <https://www.portsmouth.co.uk/news/fratton-park-bridge-proposal-portsmouth-8933514>

achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?

- 7.34.1 Yes, the Statement of Common Ground (SCG) with Portsmouth Football Club (PFC) [SCG44] dated August 2025 states that PFC agrees that the site is deliverable and viable with a reasonable prospect that the proposed development will come forward in line with the phasing set out in the SCG (which matches the Housing Trajectory). No concerns have been raised in the SCG or in representations that the delivery of necessary infrastructure cannot be viably delivered at the point it is needed.
- 7.34.2 Whilst feasibility work regarding the provision of the off-road pedestrian and cycle way is still being finalised, as this is only needed to facilitate the expansion of the football stadium which is phased for delivery in Table 4.6 of the plan in 2035-2040, there remains ample time for negotiations to proceed and conclude.

35) Are the delivery assumptions regarding the development of this site robust?

- 7.35.1 Yes, as supported by the SoCG with Portsmouth Football Club [SCG44].

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

- 7.36.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08] the SCG with Portsmouth Football Club [SCG44], and the press article regarding Fratton Park Bridge [PCC18].

PLP8: St James' and Langstone Campus

37) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

- 7.37.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference MI01. A constraints map is also provided with the site assessment. Section 10 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration of constraints. Potential constraints identified include heritage, existing open space and playing fields, flood risk, proximity of nature conservation designations and habitats for Solent Waders and Brent Geese. It is worth highlighting that the site is comprised of four parcels of land, as shown in the updated map for the site under modification AM56 of the Additional Modifications V1.0 [PCC04]. Further detail can also be found in paragraphs 8.177-8.180 of the IQR [PCC06]. Nevertheless, the constraints affecting each parcel vary.
- 7.37.2 In terms of heritage, two Grade II Listed Buildings, namely St James' Hospital and the Chapel, are located on site. Both buildings are to be retained and converted for residential use (150 dwellings) under planning permission 20/00204/FUL. It is assumed that any constraints relating to the presence of these heritage assets have been addressed under planning applications 24/0117/FUL and 20/00204/FUL. Milton Locks Conservation Area (No.21) is also to the south-east of the site, but it has had a minimal impact the development anticipated for the site and thus, mitigation measures are not required.
- 7.37.3 A significant proportion of the site is comprised of existing open space, including but not limited to playing fields and pitches. The playing pitches at Langston Campus Core and Secondary Support Areas for Solent Waders and Brent Geese. Adjacent to the east of the site is designated as SPA, Ramsar, SAC, and SSSI. Any development on site may result in direct recreational disturbance on the supporting habitats and/or designated nature conservation sites. Appropriate mitigation is not required on-site, rather it is secured via developer contributions off-site (as noted in paragraph 8.5 of the IQR [PCC06]).

- 7.37.4 Local Green Spaces (LGS) designated under Policy ENV1 of the Milton Neighbourhood Plan [EDP06, EDP07a and EDP07b] are located within and adjacent to the site allocation. These include Portsmouth and Southsea Cricket Club (LGS2), Furze Lane Sports-Fields (LGS8) and Langstone Campus Fields (LGS9). The site allocation does not conflict with these LGS as development is not expected in these parts of the site.
- 7.37.5 Part of the site is also at risk of flooding in the future, namely Langstone Campus. However, sea defences associated with the Milton Common part of the North Portsea Island Coastal Scheme have already been completed. Therefore, it is assumed that such constraint won't have direct impact on development.
- 38) **Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?**
- 7.38.1 Yes, the site allocation will make optimal use of land available for development. The site is located within a low residential density zone (at least 40dph) under Policy PLP21 of the Plan. The number of dwellings anticipated for the site will result in a site density of 56 dwellings per hectare, thus exceeding the minimum density threshold defined under Policy PLP21. The redevelopment of this site will provide an opportunity to make more efficient use of the land. It would not be appropriate to increase the density of the site further as that would mean constructing taller buildings which would not be in keeping with the character of the local area (predominantly defined by two to three-storey buildings), and would have a negative impact on the pre-existing heritage assets on site. Furthermore, the eastern part of the site adjoins the Coastal Zone (Policy PLP36 of the Plan). Any tall building development would not be appropriate and would likely have an adverse impact on key views to and from the Coastal zone and the wider landscape.
- 7.38.2 The Grade II Listed Buildings on site are to be retained and converted for residential use (150 dwellings) under planning permission 20/00204/FUL. This has had an impact on the site's capacity for homes. However, given the importance of these heritage assets, it would not be appropriate for the buildings to be demolished.
- 7.38.3 As noted in the answer to question 37 above, the designated LGS (specifically LGS2 which is located on site) and the playing pitches and Langstone Campus are also not available for residential development. Furthermore, the parcel of land owned by the Solent NHS Trust is currently in operation and will be retained for any potential future health related development. Whilst this reduces the site's overall capacity for housing, the Council has to balance the need for housing against other objectives in order to achieve sustainable development in the City. For example, the Open Space Needs and Opportunities Assessment [CG06] and Addendum [GC09] show that there is currently an undersupply of open space within the City. Thus, open space should be retained, provided and/or enhanced where possible.
- 7.38.4 Finally, the risk of flooding has not had an impact on the site's capacity for housing as sea defences that apply to the site have been completed.
- 39) **Does the policy set out appropriate development parameters and requirements? In particular, does the policy set out a sufficiently clear approach to open space and is it justified and consistent with paragraph 104 of the Framework?**
- 7.39.1 Yes, the policy sets out appropriate development parameters and requirements. A number of the development requirements address the main constraints associated within the site. Heritage is addressed in criteria 2.a-b), open space provision is addressed in criteria 2.e) and 3.b-c), potential impact on the coastal zone/landscape setting is addressed in criteria 2. c) and 3.a), recreational disturbance is addressed in criteria 4.a-b) and flood risk is addressed in criteria 4.c-e). The justification for the development parameters and requirements is set out in paragraphs 4.157 to 4.175 of the policy's supporting text in the Plan.

7.39.2 As noted above, criteria 2.e) and 3.b-c) of the policy set out the development requirements in relation to open space. This is supported by evidence in the Open Space Needs and Opportunities Assessment [CG06] and Addendum [GC09]. Paragraph 104 of the Framework is aimed at protecting open space, sports and recreational buildings and land, including playing fields and formal play spaces, unless there are exceptional circumstances. Whilst the policy is not explicit in providing caveats to allow development on the existing open space/playing fields on the site, policy PLP45 Open Space provides an appropriate set of criteria for assessing such proposals. As noted in paragraph 1.16 of the Plan, 'it is important that the Local Plan is read as a whole. All its policies should be viewed together and not in isolation in the preparation and consideration of planning applications.'

40) **Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?**

7.40.1 Yes, in the signed SoCGs with Homes England [SCG31], PJ Livesey (developer for the parcel of land owned by NHS Property Services) [SCG32] and the University of Portsmouth [SCG39], the parties confirm that their respective parts of the site are viable and deliverable in line with the phasing set out in the SoCGs, which are in accordance with the Housing Trajectory.

7.40.2 In terms of necessary infrastructure, the Milton Common part of the North Portsea Island Scheme of flood defences has already been completed. This will protect the site from flooding, specifically Langstone Campus.

41) **Are the delivery assumptions regarding the development of the site allocation robust? In particular:**

7.41.1 Yes, as evidenced in the SoCGs with Homes England [SCG31], PJ Livesey [SCG32] and the University of Portsmouth [SCG39].

a. **Has the requirement for bird surveying and the potential timescales for delivering mitigation or avoidance measures for functionally linked land been appropriately considered?**

7.41.2 Yes, please see answer to question 2, matter 14 of the MIQ, which notes how constraints on a site by site basis are factored into anticipated delivery assumptions for housing. Furthermore, as noted in the answer to question 37 above, on-site mitigation relating to functionally linked land is not required. The Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). Therefore, this has not delayed the anticipated delivery of development.

b. **Is there clear evidence that completions would begin within 5 years of adopting the Plan, as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?**

7.41.3 Yes, the site has already started delivering completions, with 12 dwellings having been delivered in the 2024/25 monitoring period, and 44 dwellings in the 2025/26 monitoring period (ref. 20/00204/FUL). Furthermore, works have also commenced under planning application 24/01117/FUL. Following the 2025/26 completions, the housing trajectory has been updated to reflect the changes to the phasing. This has involved a slight delay in completions anticipated for the rest of the plan period. However, it remains the case that the site has begun and will continue to deliver completions within 5 years of adopting the Plan.

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

7.42.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08] and the SCGs with Homes England [SCG31], PJ Livesey [SCG32] and the University of Portsmouth [SCG39].

PLP9: Horsea Island Strategic Open Space

43) **Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular:**

- a. **Has the role of the site in providing supporting habitat for Solent Waders and Brent Geese been appropriately taken into account?**
- b. **To what extent may public access need to be restricted across the site to ensure the safe extraction of gases from the former landfill and reflect the extent of the Ministry of Defence's Exclusion Zone, and is there certainty that sufficient open space will be publicly accessible?**

7.43.1 Yes. The Constraints Topic Paper [TP12] and Section 11 of the Allocations Topic Paper [TP08] provides an overview of the evidence informing the allocation of this site including the consideration of constraints and the HRA [KD18] confirms that appropriate mitigation can be achieved as outlined below.

- a. **Has the role of the site in providing supporting habitat for Solent Waders and Brent Geese been appropriately taken into account?**

7.43.2 The role of PLP9 in providing supporting habitat for Solent Waders and Brent Geese has been appropriately taken into account in the HRA [KD18]. Paragraphs 4.45 and 6.68 to 6.70 of the HRA specifically discuss Horsea Island Open Space (PLP9), the potential effects it could have on functionally-linked land parcels P48A, P48B, P75 and Support Area P48C through either direct loss of habitat or indirect impacts through recreational use, and the policy wording that ensures the protection of those land parcels.

- b. **To what extent may public access need to be restricted across the site to ensure the safe extraction of gases from the former landfill and reflect the extent of the Ministry of Defence's Exclusion Zone, and is there certainty that sufficient open space will be publicly accessible?**

7.43.3 It is anticipated that there will be some areas of restricted public access due to the on-site infrastructure for methane and leachate extraction relating to the former landfill, currently comprising a series of wells and pipes, as noted in paragraph A135 of the supporting text to policy PLP9. These would be fenced off from public access not just for public safety but also to prevent tampering. The precise details of these areas of enclosure are currently under assessment by the Council and Veolia but are not anticipated to prejudice the overall functionality, enjoyment and recreational benefit of the proposed public open space.

7.43.4 With regard to the MoD Consultation Zones identified on Figure 4.8 for policy PLP9, it is not considered that this undermines the wider area and recreational value of the proposed strategic open space, which amounts to circa 64ha in total. Proposed bus and cycle routes requiring access to the proposed Tipner West-Horsea Island bridge will be able to utilise the northern and eastern perimeter of the site. The final details of public access, which may yet be possible within the 'Outer Consultation Zone', are pending detailed design and discussion with the MoD. Generally, an 'Outer consultation zone' would not wholly exclude development or public access, whereas this would be more likely for the 'Inner Consultation Area'.

44) **Would the site allocation make optimal use of land?**

7.44.1 Yes. As a former landfill site, it is not suitable for residential development and not required for employment floorspace. Its elevated topography would also raise security concerns for the MoD having regard to the defence facility to the immediate south and could also give rise to

unacceptable visual or heritage setting impacts. The site as a whole also comprises primary and core areas of functionally linked land for SPA species.

7.44.2 For a City constrained by existing built development and by its coastline, Horsea Island represents a significant opportunity to provide new open space and habitat for the benefit of local communities and wildlife as noted in the Vision at paragraph A132 of the Plan. The Constraints Topic Paper [TP07, paragraph 2.6] highlights that the City has a deficit of circa 37ha of public open space and this deficit is expected to grow as the City population grows.

45) **Does the policy set out appropriate development parameters and requirements? In particular what is meant by the 'zone of visibility' identified in part 3(i) of the policy and is its spatial extent sufficiently clear?**

7.45.1 Yes, the Council is satisfied that the policy sets out appropriate development parameters and requirements. The policy is considered to meet the aspirations of the site specific Vision at paragraph A132 as well as the Portsmouth 2040 Vision for a healthy and happy City and a green City. The parameters and requirements of the policy are guided by the need to deliver upon the Vision, in particular with regard to key issues of on-site remediation, improved wildlife habitat, protection of SPA functionally linked land, MoD Exclusion Zones and infrastructure supporting public access to the site. In terms of the 'zone of visibility' the Inspectors are referred to the Council's response on this issue under Q9 (Tipner West) of this Matter.

46) **Are the delivery assumptions regarding the development of this site robust? In particular, the Monitoring and Delivery Framework for the site indicates that delivery of the strategic open space would be delivered post 2035. Has this been appropriately reflected in the delivery timeframes for development that would rely on the use of the open space?**

7.46.1 Yes, the delivery assumptions are considered to be robust having regard to on-going site health-risk assessments informing the proposed strategy for public access to the site. No strategic site allocation is dependent upon the delivery and use of the proposed open space. Whilst the Port Solent site allocation would be expected to require future resident access to the Horsea Island Strategic Open Space in order to mitigate potential recreational pressure on the European sites (as noted in paragraphs 6.5 and 7.4 of the HRA [KD18]), the delivery timeframes for both allocations are aligned at post-2035.

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

7.47.1 Yes, as supported by evidence in the Constraints Topic Paper [TP12], the Allocations Topic Paper [TP08], the HRA [KD18] and the SoCG with the Defence Infrastructure Organisation (DIO) [SCG24].

PLP10: Land West of Portsdown Technology Park

48) **Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular: Has the presence and significance of non-designated heritage assets been appropriately addressed in the policy?**

7.48.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference PA05A. A constraints map is also provided with the site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). Section 12 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration constraints.

7.48.2 The site is located at the top of Portsdown Hill which is an area of considerable historic interest dating back to neolithic times. This is noted in paragraph A153 of the Plan and criterion 2i requires development proposals to respond positively to the presence of non-designated heritage assets.

49) Would the site allocation make optimal use of land?

7.49.1 Yes, the site allocation makes optimal use of land. The site is largely brownfield but is located prominently on the ridge of Portsdown Hill, being visible both from the south from the City and from the north from the Weald and the South Downs beyond. Criterion 2 f therefore requires development to be focused on the previously developed land adjacent to Portsdown Technology Park and minimise built structures on the northern downland slopes.

50) Does the policy set out appropriate development parameters and requirements?

7.50.1 Yes. The type of employment land allocated for the site changed from R&D (E(g)(ii) and/or manufacturing (B2) in the Pre-Submission Plan 2024 [KD01] to E(g)(ii), B2, and B8 uses in the Pre-Submission Plan Addendum 2025 [KD02]. This is explained in paragraph 4.4.26 of the Thriving Economy Topic Paper [TP14]. The addition of B8 to the list of uses that would be permitted on the site was justified in transport terms by the Transport Assessment prepared by the site promoter, which forms appendix 4 of the superceded Statement of Common Ground [SCG38].

7.50.2 The parameters and requirements for the allocation were agreed in the final Statement of Common Ground with the site promoter [SCG45] after being a matter of disagreement in the now superceded Statement of Common Ground [SCG38].

7.50.3 The development requirements are appropriate and evidence-based relating principally to transport as evidenced in the Strategic Transport Assessment [IN05] and the Transport Assessment prepared by the site promoter, which was reviewed by the Council as the Local Highway Authority.

51) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework?

7.51.1 Yes, this is a prime employment site next to a thriving technology park in a cluster of advanced manufacturing businesses linked to the Ministry of Defence. The greater flexibility of uses allowed on site with the addition of B8 has increased the likelihood of delivery. The Statement of Common Ground [SCG38] states that the site promoter considers the allocation to be deliverable and viable. It also sets out that the site promoter agrees with the phasing which is the same as that set out in table 5.2 forming the monitoring and delivery strategy for the site.

52) Are the delivery assumptions regarding the development of this site robust?

7.52.1 Yes, the delivery assumptions are robust and are backed up by the Statement of Common Ground [SCG45].

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

7.53.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08], the IQR [PCC06] and the SCG with the site promoter [SC45].

PLP11: Port Solent

54) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

- 7.54.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference PA01. A constraints map is also provided with the site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). The Constraints Topic Paper [TP12] and Section 13 of the Allocations Topic Paper [TP08] also provide an overview of the evidence informing the allocation of this site including the consideration of constraints.
- 7.54.2 It is also noted at paragraphs 6.5 and 7.4 of the Habitats Regulations Assessment (HRA) [KD18] that the anticipated recreational pressure arising from additional residential development of Port Solent would be capable of mitigation particularly with regard to the delivery of Horsea Island Strategic Open Space under policy PLP9 but also through the established Bird Aware Solent Recreation Mitigation Strategy (SRMS). Risks associated with potential tall buildings are considered capable of mitigation through detailed design measures at the project level and are also mitigated to an extent by existing built development (see paragraph 6.155 of the HRA).
- 7.54.3 As noted in paragraph A164 in the introductory text to policy PLP11, the single site access via the junction of Portway and Southampton Road is at significant risk of flooding under climate change modelled scenarios. As such, and as noted in the section 9.0 of the Level 2 SFRA [CE04a], a secondary means of emergency access will be required to mitigate these flooding risks. It is anticipated that this would comprise the proposed bridge connecting Horsea Island with Tipner West as noted in paragraph 13.5.1 of the Allocations Topic Paper, page 69 of the IDP [IN16] and the Council's answers to Q12 of the Initial Questions [PCC06].

55) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular:

- a. How have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?**
- b. Does the evidence indicate that 500 or a higher number of homes may be developable at this site during the plan period?**

- 7.55.1 Yes, the allocation is considered to make the optimal use of land to maximise housing delivery having particular regard to the preliminary works required for sea defence and safe access in the event of flooding. With regard to (a), the details of opportunities and constraints informing the site's developable area can be found in the section 13.0 of the Allocations Topic Paper [TP08] and Constraints Topic Paper [TP12], noting in particular potential contamination from former landfill uses, future flood risks, heritage setting considerations and a shortfall in foul sewerage infrastructure for the site.
- 7.55.2 In answer to (b), the delivery timeframes for the site are set out in the Monitoring and Delivering Framework of the policy (Figure 5.3) and, having regard to the necessary preliminary works, commencement and build out of 500 homes is considered to be realistic in the period 2035-40. However, as noted in the Council's answer to Q15 of the Initial Questions [PCC06], whilst site capacity is considered capable of accommodating a further 400 homes, the prior need for the Tipner West/Horsea Island bridge, the absence of an existing planning permission and recognition of viability constraints affecting the development, these additional homes have been earmarked for delivery beyond the Plan period. Nevertheless, the Council wishes to emphasise that dialogue is continuing with the site promoters in particular to explore funding opportunities from Homes England and a meeting between the Council and Homes England in this regard is scheduled for mid-October. There has also been recent formal pre-application discussion with the site promoters (Premier Marinas and CBRE(IM)) reflected in the Statement of Common Ground [SCG52], where indicative masterplanning by the site promoters (in Appendix 2 of the SoCG) has suggested the site as a whole could accommodate up to 1,300 dwellings. However, this would be dependent to a significant extent upon tall building development across the site and the Council consider that an allowance for up to 900 is more prudent at this stage, having regard to the

constraints impacting upon tall buildings associated with the setting of Portchester Castle, land contamination and leachate risks (not least from piling methods of construction) and HRA-related issues such as SPA bird flight paths. The Council will continue to work positively and proactively with the site promoters to assist site delivery.

56) Does the policy set out appropriate development parameters and requirements?

7.56.1 Yes, the Council is satisfied that the policy contains appropriate development parameters and requirements which address the identified various site constraints alluded to above. In particular, the developer would be required to contribute proportionally to the delivery of the necessary bridge connecting Horsea Island with Tipner West and secondary flood evacuation route required for the site allocation. This policy requirement is also expressly set out for the strategic site allocations of Tipner West (PLP3) and Horsea Island Strategic Open Space (PLP9) and will aid the Council's funding negotiations with strategic funding bodies, such as Homes England, as noted above.

57) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular:

a. Table 19.1 of the IQR indicates that the best-fit development typology from the DVA for the site would be unviable. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?

7.57.1 As noted in the Council's answers to Q54 and Q55 above and as documented in the Council's answer to Question 19 of the Inspector's Initial Questions (IQR) [PCC06], the site has significant constraints to development. However, as confirmed in the Statement of Common Ground with the site promoters [SCG52] it is agreed that the site is available and deliverable as set out in the Plan. There are acknowledged viability constraints and these will require continued positive engagement between the Council and site promoters, alongside strategic funding bodies, to bring the site forward, including a positive approach to optimising the site's capacity for residential development as noted in the Council's answer to Q55.

b. Paragraph 8.194 of the IQR indicates that the Tipner West to Horsea Island bridge is critical to the site's delivery. What are the reasons for this, where is this set out in the evidence, and is there sufficient certainty that development will come forward as anticipated by the Plan in that context?

7.57.2 The critical need for the Tipner West to Horsea Island bridge and the associated evidence is discussed in further detail in the Council's answer to Matter 1, Q7. The bridge will be a requirement for full delivery of the Port Solent site (some incremental new residential development may be accommodated, subject to project-level flood risk assessment). The need for the bridge is identified in the Local Transport Plan [IN08] as part of the South East Hampshire Rapid Transit (SEHRT) bus network. Therefore strategic funding discussions will continue in the context of both transport and planning infrastructure and potentially including the Hampshire and the Solent Mayoral authority in due course.

58) Are the delivery assumptions regarding the development of this site robust?

7.58.1 Yes. See the Council's answer to Q55 above and to Q19 of the IQR [PCC06].

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

7.59.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08], the Constraints Topic Paper [TP12], the HRA [KD18] and the SoCG with the site promoters [SCG52].

PLP12: St John's College

60) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

7.60.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2023 [HO08] includes a site assessment for this allocation, under site reference SJ15. Potential constraints identified include heritage, scale, density, appearance, living standards and amenity. It is considered that such constraints, and any necessary mitigation measures, have been addressed through the planning application for the site (23/01089/FUL), which was granted full permission 25.06.2024. When preparing the HELAA Report and Appendices 2025 [HO04] the site was moved to Appendix 1B due to permission having been granted, so no Stage 2 site assessment was carried out for the 2025 HELAA as this was not necessary. Numerous discharge of conditions have also been submitted and approved for the site; further detail can be found in the housing land supply template for the site, which is on page 176 of the IQR [PCC06].

61) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?

7.61.1 Yes, the site allocation will make optimal use of land. The anticipated number of homes for the site is based on the planning application for the site (23/01089/FUL), which was granted permission 25.06.2024. Opportunities and constraints were considered as part of the planning application process.

7.61.2 In terms of constraints, the site is located entirely within the Owen's Southsea Conservation Area (No.2) and there are two Grade II Listed Buildings located on site (The Castle and Linholme), as well as three non-designated locally listed buildings (St Catherines, Warleigh and The Scholes Building). Under planning application 23/01089/FUL, all buildings of historic merit will be retained and converted to residential dwellings. This has had an impact on the site's capacity for homes. However, given the high importance of these heritage assets, it would not be appropriate for the buildings to be demolished. By contrast, a number of other buildings on-site have been demolished, which has provided an opportunity to increase the site's capacity for homes.

7.61.3 The site allocation is located within a medium residential density zone (at least 80dph) under Policy PLP21 of the Plan. The number of dwellings anticipated for the site will result in a site density of 106 dwellings per gross hectare, thus exceeding the policy requirement. The redevelopment of this site has provided an opportunity to make more efficient use of the land. It would not be appropriate to increase the density of the site further as that would mean constructing taller buildings which would not be in keeping with the character of the local area and would have a negative impact on the pre-existing heritage assets both on and adjacent to the site.

7.61.4 Since the Plan was submitted for examination, a new application has been submitted for the site (26/00464/FUL) that will result in a loss of 63 dwellings, making the total number of dwellings 149 instead of 212, resulting in a site density of 76 dwellings per gross hectare (only slightly under the policy requirement for policy PLP21). This is due to market demand for more larger family houses than flats. Whilst the new application, if granted, will result in a reduced number of dwellings, this will now help the Council meet need for larger family homes as opposed to apartments. Table 7.16 of the HEDNA 2023 [HO01] shows that the existing housing stock in Portsmouth is predominantly made up of 1-bedroom flats, maisonettes or apartments. There is therefore a need to provide a greater range of different sizes of homes. Table 7.17 of the HEDNA 2023 [HO01] sets out the recommended housing mix for Portsmouth. Whilst paragraph 7.54 of the HEDNA 2023 [HO01] indicates a particular need for 2-bedroom accommodation, there is a clear need for a range of different sizes of homes, which the revised application will help to deliver.

62) Does the policy set out appropriate development parameters and requirements?

- 7.62.1 Yes, the policy sets out appropriate development parameters and requirements, and the emerging policy has not prevented the site from securing planning permission within the development parameters and meeting the requirements of the emerging policy. The indicative masterplan is necessary to ensure high-quality design is achieved on the site. As highlighted in the answer to Q.61, there are a number of heritage assets within and surrounding the site. It is also located within a Conservation Area. Therefore, the development requirements in regard to heritage are important to conserve the historic fabric and setting of the site and its immediate surroundings.
- 7.62.2 The justification for the remaining parameters and requirements set out in the policy is provided paragraphs 5.47-5.50 of the policy's supporting text in the Plan.
- 63) **Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?**
- 7.63.1 Yes, in a signed SoCG with the Council [SCG36] dated August 2024, the site landowner - Southsea Village Limited confirms that development of the site is viable and deliverable in line with the phasing set out in the SoCG, which is an accordance with the Housing Trajectory. It is assumed that any necessary infrastructure was taken into account at the planning application stage. Given that the site has full planning permission and there has been significant progress on site, including completions, this further supports the viability and deliverability of the site. Based on the above, there is sufficient certainty that the milestones set out in the policy's Monitoring and Delivery Framework will be achieved.
- 7.63.2 As noted in the Council's answer to Q.61, an application has recently been submitted for the site that will result in a loss of 63 dwellings (26/00464/FUL). Although this will result in a change to the number of dwellings anticipated for the site, there are no reasons to indicate that the site is no longer viable or deliverable. Due to the pending planning application, a small delay in completions is now predicted as reflected in the amended Housing Trajectory. The Council also proposes supplementary modifications [PCC15] to the Plan to reflect the change in the anticipated number of dwellings. These are as follows:

Paragraph 5.43

The College is identified in the HELAA as having potential for 212 dwellings. The main constraints on the site identified in the HELAA are the significant presence of mature trees some of which are protected, two Listed Buildings (The Castle and Linholm) and three Locally Listed buildings (The Scholes Building, St Catherine's House, and No.3 Nelson Road). An application (23/01089/FUL) has been submitted for the conversion and extension of the former college buildings to create 110 apartments and demolition of college buildings and erection of new buildings to create 102 apartments utilising existing access from Grove Road South, Nelson Road and Albany Road. In Summer 2026, a "drop in" application (26/00464/FUL) was submitted, amending the original scheme, which will result in a loss of 63 dwellings, making the total number of dwellings anticipated for the site 149.

Policy PLP12: St John's College

1. St John's College, as shown on the Policies Map, is allocated for the development of the following uses:
 - a) 212 149 dwellings

Table 5.4 Monitoring and Delivery Framework for St John's College

Types & amounts of development	Timescale	Delivery	Monitoring	Triggers & potential action points
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242 149 Dwellings	2030-2035	Through the development Management process; working in partnership with Developer, freeholder and leaseholder.	Housing monitoring in the AMR	Ongoing liaison with The developer and close cooperation to identify potential sources of delay and deliver timescales more precisely.
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64) **Are the delivery assumptions regarding the development of this site robust? In particular, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?**

7.64.1 Yes, the delivery assumptions regarding the development of this site are robust. This is supported by the SCG between the Council and Southsea Village [SCG36]. Furthermore, the site has already started delivering completions, with 31 dwellings having been delivered in the 2025/26 monitoring period. Since submitting the Local Plan for examination, an application has been submitted for the site that will result in a loss of 63 dwellings (26/00464/FUL), amending the proposals granted under planning permission 23/01089/FUL. The housing trajectory has now been updated to reflect the changes in the anticipated number of dwellings for the site, which also involves a slight delay in completions to allow time for the pending planning application to be determined. However, it remains the case that the site has begun, and will continue to deliver completions within 5 years of adopting the Plan.

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

7.65.1 Yes, as supported by evidence in the HELAA Report and Appendices 2025 [HO04], the HELAA Report and Appendices 2023 [HO08], SCG between the Council and Southsea Village Limited [SCG36], the Allocations Topic Paper [TP08], the IQR [PCC06], and the HEDNA 2023 [HO01].

PLP13: Fraser Range

66) **Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular has the presence and significance of non-designated heritage assets been appropriately addressed in the policy?**

7.66.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference EC01. A constraints map is also provided with the site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which require developers to pay contributions towards addressing these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]).

7.66.2 Section 15 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration of constraints. The presence and significance of non-designated heritage assets is appropriately addressed at policy PLP 13 2 f) which requires proposals to respond positively to the presence of undesignated heritage assets on the site, and at 13 2 g) which requires a heritage statement that assesses the significance and importance of proposals on any heritage assets to be provided.

7.66.3 There are a modest number of heritage assets relatively close to the site, the most significant of which is the Scheduled and Listed Fort Cumberland. The site is also largely within an SPA and elements of it are designated as a Ramsar site, SAC, and SSSI. It also includes a small area of

SINC. Part of the south west corner of the site is a Primary Support Area for Solent Waders and Brent Geese. In light of these factors it is considered important both to conserve the setting of nearby assets, and to respond to the various environmental designations affecting the site. The resolution to grant permission on the site demonstrates that in principle, the proposal has overcome these various constraints.

67) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?

7.67.1 Yes, the Fraser Range allocation would make optimal use of land. The anticipated number of homes for the site - 134, is based on a planning application (19/00420/FUL) which has had resolution to grant planning permission since 02.12.2025. As the Planning Committee report submitted with the application makes clear, site constraints including heritage assets and environmental/ ecological designations were considered as part of the planning application process. These had an impact on the site's capacity for homes, building distribution and heights.

7.67.2 As noted in the Council's answer to Q66, the HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference EC01. A constraints map is also provided with the site assessment. Section 15 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including a summation of site constraints and opportunities. It is considered that these documents, alongside the HRA [KD18] provide a robust rationale for the extent of developable area and the site's capacity for homes.

68) Does the policy set out appropriate development parameters and requirements?

7.68.1 Yes, the policy sets out appropriate development parameters and requirements. The emerging policy has not prevented the site from securing a resolution to grant planning permission within the development parameters and meeting its requirements.

7.68.2 The development requirements respond to the constraints on the site as referenced in the Council's answer to Q.66, in particular the heritage constraints which relate to parts 2a), f), and g) of the policy; the ecological constraints which relate to parts 2b), c), d), and e) of the policy; and flooding constraints which relate to parts 2h), i) and j) of the policy (as well as part 1b) as a development parameter).

69) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, the SoCG on behalf of the landowner [SCG43] indicates that an application that is subject to a resolution to grant permission on this site has viability pressures, and page 148 of the IQR indicates the flood defences included in the scheme may be revised as a result. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?

7.69.1 Yes, there is sufficient certainty that the viability of the site and the infrastructure required to bring it forward including the necessary flood defences would be viable. It is considered that this is demonstrated both by the relatively recent resolution to grant full planning permission for the site (19/00420/FUL), and the Statement of Common Ground related to this allocation dated Jan 2025 [SCG43], where the applicant has states at paragraph 3a) that it is appropriate to assume that the site will come forward with a minimum of 134 units, and that evidence submitted in support of the planning application (19/00420/FUL) shows that the scheme is deliverable and viable. No concerns have been raised in the SoCG or in representations that the delivery of necessary infrastructure cannot be viably delivered at the point it is needed.

7.69.2 Whilst the viability pressure regarding flood defences is acknowledged, it is considered that scheme delivery is sensitive to changes in the market, rather than being unviable or

undeliverable. The developer of the site is currently amending proposals for the flood defences to reduce their cost and improve site viability. The wording of the policy does not preclude a more cost effective scheme coming forward. Pursuit of public subsidy is another option for the site, this could include exploration of the future new funding regime available through the emerging Hampshire and the Solent Combined County Authority (HSCCA).

- 7.69.3 Recent ministerial advice in the form of a letter to the interim Chief Executive of the Planning Inspectorate (published 15th July 2026) [PCC27] around the question of deliverability and viability in Local Plan examinations may have relevance in relation to this allocation. The letter emphasises the importance of taking an appropriately pragmatic and proportionate approach in respect of deliverability and viability when examining local plans. It notes the importance of considering deliverability and viability challenges in a broad context, especially when economic conditions are volatile and are causing fluctuations to market conditions and heightening development risk and associated costs. As such, allocations should generally be assessed against their prospects of delivery over the plan period as a whole, rather than solely against current market conditions. It makes clear that:

'Inspectors should carefully consider whether identified deliverability and viability issues are of such significance that they genuinely undermine the soundness of the plan, or whether they represent matters that could reasonably be expected to evolve over time as market conditions change. In doing so, Inspectors should distinguish between uncertainty arising from prevailing market conditions and evidence indicating a fundamental obstacle to delivery. Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable.'

- 70) **Are the delivery assumptions regarding the development of this site robust? In particular, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?**

- 7.70.1 Yes, the delivery assumptions regarding the Fraser Range site are considered robust. The site has resolution to grant planning permission (19/00420/FUL), significant work in support of the planning application was submitted, including site surveys, site masterplanning, sea defence designs, community engagement and consultation with statutory consultees. The Council anticipates full planning permission being secured by 2028, so that conditions can be discharged ready for completions starting from 2029/30.

- 71) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**

- 7.71.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08], the HRA [KD18] and the SoCG with the site agent [SCG43].

PLP14: The News Centre, Hilsea

- 72) **Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?**

- 7.72.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference HI06. A constraints map is provided with the site assessment. Section 16 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration constraints.

- 7.72.2 The key constraint for the site is flooding. All of the site currently falls within flood zones 2 and 3, with most of the southern parcel falling in flood zone 3, and most of the northern parcel falling in flood zone 2. However, appropriate mitigation via flood defences can be achieved, see paragraph 8.226 of the IQR [PCC06] for further detail. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required,

and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]).

73) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?

7.73.1 Yes, the site allocation will make optimal use of land available for development. The demolition for the former News Centre has provided an opportunity to increase housing delivery within the City. The southern part of the site is proposed for a bus depot under the policy which already has planning permission (23/01470/FUL) and works have commenced. This area is therefore not available for housing and the site's developable area for housing is based on the northern parcel.

7.73.2 The site is located within a medium residential density zone (at least 80dph) under Policy PLP21 of the Plan. The number of dwellings anticipated for the site (northern parcel only) will result in a site density of 105 dwellings per hectare, thus exceeding the minimum density threshold defined under Policy PLP21. Whilst there is always scope for development to be built taller and at a higher density, and the Council acknowledges that there is a six-storey building nearby, it is not considered appropriate for development of over five storeys to be delivered on the site given that the site is in an area predominantly defined by two and three storey residential dwellings (see paragraph 3.405 of the UCS [VD03]). Therefore, a development of less than five storeys has been anticipated by the Council.

7.73.3 The number of homes for this site has been based on discussions with landowners and professional judgement. In terms of constraints, the northern parcel falls within flood zone 2. However, the North Portsea Island Scheme (Ports Creek phase) flood defence is anticipated to be delivered in time for this site to come forward. Therefore, flooding has not had an impact on the site's capacity for homes.

74) Does the policy set out appropriate development parameters and requirements? In particular, is the policy sufficiently flexible to accommodate an appropriate range of uses on the site?

7.74.1 Yes, the policy sets out appropriate development parameters and requirements. The justification is set out in paragraphs 5.79-5.88 of the policy's supporting text in the Plan.

7.74.2 In regard to the flexibility of the policy, the Council acknowledges that in the representation submitted by Vail Williams on the Portsmouth Pre-Submission Local Plan 2024, they contend that the lack of flexibility around the types and quantum of uses proposed for the northern parcel of the News Centre site allocation (remainder of the site after the all-electric bus depot is taken into account) limits the site's potential to respond to market needs. Furthermore, their Regulation 19 representation stated that there has been no developer interest expressed for the northern parcel:

'no serious interest or offers from residential developers have been received indicating that the market does not see this site as a residential development site.'

7.74.3 Since the time of writing their representation (summer 2024), there has been developer interest expressed for the northern parcel of the News Centre site allocation (summer 2025), detail of which can be found in the SoCG between the Council and City & Regional Ltd [SCG46]. Therefore, the Council deemed it was unnecessary to introduce greater flexibility to accommodate a range of other uses on site.

75) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular: Table 19.1 of the IQR indicates that the best-fit

development typology from the DVA for the site would be unviable. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?

- 7.75.1 Despite what is noted in table 19.1 of the IQR, there is sufficient certainty that development supported at the site would be viable. In regard to the electric bus depot, planning permission was granted 05.06.2025 (23/01470/FUL) and works have commenced on site. In terms of the northern parcel, the SoCG with City and Regional Ltd [SCG46] dated November 2025 states that they are confident that the development of the site will be viable, subject to the requirements of PCC as the LPA, and they are not aware of any abnormal or exceptional build costs that would impact the viability of the site. They are also content with the phasing set out in the SCG (which matches the Housing Trajectory) and since submitting the Plan for examination, a pre-application enquiry has been submitted for the northern parcel.
- 7.75.2 In terms of necessary infrastructure, the North Portsea Island Scheme (Portscreek phase) flood defence is scheduled to be delivered in time for this site to come forward, as evidenced in Table 16.1 of the IQR [PCC06], which also notes that funding for the flood defence has already been secured.

76) Are the delivery assumptions regarding the development of this site robust?

- 7.76.1 Yes, as evidenced in the SoCG with City & Regional Ltd [SCG46].

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

- 7.77.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08], the SCG with City & Regional Ltd [SCG46], the IQR [PCC06] and the Urban Characterisation Study [VD03].

PLP15: Somers Orchard

78) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

- 7.78.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] includes a site assessment for this allocation, under site reference ST11. A constraints map is also provided with the site assessment. A small part of the north-west corner of the site is within a Conservation Area and an Air Quality Management Area, and there are listed buildings within the vicinity of the site. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]). Section 17 of the Allocations Topic Paper [TP08] also provides an overview of the evidence informing the allocation of this site including consideration constraints.
- 7.78.2 It is considered that such constraints noted above, and any necessary mitigation measures, have been addressed through the planning applications for the site (23/01574/FUL and 23/01575/FUL), which were granted full permission 02.12.2025.

79) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?

- 7.79.1 Yes, the site allocation will make optimal use of land. The anticipated number of homes for the site is based on the planning applications for the site (23/01574/FUL and 23/01575/FUL), which were granted permission 02.12.2025. Opportunities and constraints were considered as part of the planning application process. It is deemed that the constraints identified above had a minimal impact on the site's capacity for homes. In terms of opportunities, two main areas of the site

allocation are proposed for housing. The first is the Gibson Centre redevelopment. The second is the Melbourne Place Car Park and the land occupied by the former Horatia and Leamington Houses, which were demolished in 2022. The demolition of the tower blocks in particular has provided an opportunity to increase the site's capacity for homes. It is anticipated that the site will deliver a net gain of 294 dwellings. The site allocation is also located within a high residential density zone (at least 120dph) under Policy PLP21 of the Plan. The number of dwellings anticipated for the site will result in a site density of 168 dwellings per gross hectare, thus exceeding the policy requirement.

7.79.2 Given that the former Leamington and Horatia Houses were 18 storeys and that there are several other tall buildings within the vicinity of the site, tall buildings are considered appropriate for the site allocation in order to achieve the high density requirements proposed under Policy PLP21. This is supported by the UCS [VD03], which highlights that the 'area of distinct character' associated with the site allocation is defined by high density development and tall buildings (paragraph 3.674). Under the planning permission granted for the site, buildings of up to 32 storeys are proposed. It is assumed that any necessary mitigation measures associated with such tall buildings were addressed through the planning application process.

80) Does the policy set out appropriate development parameters and requirements? In particular, What is the justification for referring to tall buildings within the policy?

7.80.1 Yes, the policy sets out appropriate development parameters and requirements. In regard to the justification for referring to tall buildings within the policy, please refer to the Council's answer provided to Q.79 above. Further detail regarding the other parameters and requirements set out in the policy is detailed in paragraphs 5.47-5.50 of the policy's supporting text in the Plan. The affordable housing requirements are also supported by the findings of the HEDNA Update [HO02], which identifies a need for affordable housing within Portsmouth (paragraph 4.42). The development requirements regarding the nearby heritage assets is supported by the findings of the HELAA Report and Appendices [HO04], as detailed in the answer to Q.78 above.

81) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, Table 19.1 of the IQR indicates that the best-fit development typology from the DVA for the site would be unviable. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?

7.81.1 Yes, the Statement of Common Ground (SoCG) with Portsmouth City Council Housing Revenue Account (PCC HRA) [SCG48] dated March 2026 states that they agree that the site is deliverable and viable with a reasonable prospect that the proposed development will come forward in line with the phasing set out in the SoCG (which matches the Housing Trajectory). No concerns have been raised in the SoCG or in representations that the delivery of necessary infrastructure cannot be viably delivered at the point it is needed. It is assumed that any requirements for infrastructure have been taken into account in the two planning applications submitted for the site.

7.81.2 Despite what is noted in Table 19.1 of the IQR [PCC06], there is sufficient certainty that development supported at the site would be viable. The two planning applications associated with the site have been granted planning permission and in March 2026, the Council signed off the first phase of the Somers Orchard redevelopment and is currently seeking a contractor.

82) Are the delivery assumptions regarding the development of this site robust? In particular, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?

7.82.1 Yes, as evidenced in the SCG with PCC HRA [SCG48] and paragraph 15.45 of the IQR [PCC06]. As noted above in the Council's answer to Q.81, the Council has also recently signed off the first phase of the Somers Orchard redevelopment and is seeking a contractor.

7.82.2 The number of dwellings anticipated for the site have changed from 565 to 566 to reflect the number of dwellings in the planning permissions for the site. The Council has proposed modifications MM64, MM65, MM67 and MM69 in the Main Modifications V1.0 [PCC03] and a supplementary modification [PCC15] to reflect this change. The SCG with PCC HRA [SCG48] reflects this new figure.

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

7.83.1 Yes, as supported by evidence in the HELAA 2025 [HO04], the Allocations Topic Paper [TP08], the IQR [PCC06], the HEDNA Update [HO02] and the SoCG with PCC HRA [SCG48].

Sites identified in Appendix 2 of the Plan

Please provide a response to the below questions for each of the sites identified in Appendix 2 of the Plan.

84) Have constraints to the development of each site in Appendix 2 been adequately considered and, where necessary, can appropriate mitigation be achieved?

7.84.1 Yes, constraints to development have been adequately considered. The HELAA Report and Appendices 2025 [HO04] include site assessments for each of the sites identified in Appendix 2. The HELAA site references are provided in Appendix 2 of the Plan with the relevant site. A constraints map is also provided in the HELAA with each site assessment. Constraints which apply City-wide (nutrient neutrality and recreational disturbance) are not flagged in the HELAA as on-site mitigation is not required, and the Council has established schemes which developers pay contributions towards to address these matters off-site (as noted in paragraph 8.5 of the IQR [PCC06]).

7.84.2 Further information on the identified sites can be found in the Council's answers to questions 8 and 15 of the IQR. However, a brief summary of the key issues is set out below for each site.

7.84.3 At COP01 Brynwell Builder's Yard, the HELAA constraints map shows there are no significant constraints affecting the site. Whilst a previous appeal on the site was dismissed due to lack of a S106 to provide nutrient neutrality mitigation (as noted in paragraph 8.240 of the IQR), the Council has an established mitigation scheme for addressing this off-site, so that constraint can be overcome through payment towards the scheme via an appropriate S106 accompanying any subsequent application.

7.84.4 At COS01 Cosham Health Centre, the HELAA constraints map shows there are no significant constraints affecting the site.

7.84.5 At CS06 227-231 Goldsmith Avenue, whilst there is an AQMA and a listed building nearby, these are not likely to be significant constraints to development.

7.84.6 At EC14 Eastney Swimming Pool there are some significant constraints affecting the site, notably flooding; the majority of the site is within flood zone 3. For this reason, proposed development is limited to the small area of the site at a lower risk of flooding, located in flood zone 1. The presence of listed buildings both on and adjacent to the site can be taken into account in the design of any new development.

7.84.7 Site FR06 St Wilfrids Church is now proposed to be removed from Appendix 2 of the Plan.

7.84.8 At MI07 185-192 Highland Road, the HELAA constraints map shows that there are no significant constraints affecting the site. This site also now has planning permission, so constraints will have been taken into account in the planning application (ref. 25/00587/FUL).

7.84.9 At ST03 Open space at Stone Street, the HELAA constraints map shows that there are some tree preservation orders on site, and some listed buildings and conservation areas nearby.

However, these constraints have been overcome via the planning application for the site which has resolution to grant planning permission (ref. 23/00863/FUL).

- 7.84.10 At HI02 Land of former supermarket, Stubbington Avenue, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.11 At BA01 Coniston Avenue, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.12 At BA02 West of Milton Road, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.13 CD01 Wardroom is now proposed to be removed from Appendix 2 of the Plan.
- 7.84.14 At CD04 The Invincible, Wickham Street, whilst there are some constraints nearby, these have been taken into account and overcome through the planning permission for the site (ref. 18/00848/OUT).
- 7.84.15 At CD07 Bridge Centre, Fratton, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.16 At CD10 Maxstoke Close Car Park, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.17 At CD15 Hertford Place, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.18 At CD35 42 Kent Street, Groundlings Theatre, the HELAA constraints map shows that much of the site is occupied by a large listed building, and the whole site is located within a conservation area. As the proposals involve retaining the existing listed building, it is considered likely that the heritage constraint can be overcome with good design.
- 7.84.19 At CD65 117-127 Fratton Road (former Fratton Cinema) the HELAA constraints map shows that the site is within an AQMA, and adjacent to a listed building. The AQMA constraint does not prevent development, and it is considered that good design can mitigate impacts on the adjacent listed building (The Guardsman Public House).
- 7.84.20 At CD75 Venture Tower, the HELAA constraints map shows that most of the site is within an AQMA, but this constraint does not prevent development.
- 7.84.21 At COS03 Westmoors, 50 London Road, Cosham, the HELAA constraints map shows that a tree preservation order (TPO) covers most of the site. Whilst a planning application was refused on the site in 2020 (ref. 19/00574/FUL) this was on design grounds and did not relate to the TPO, so it is considered likely that this constraint can be overcome.
- 7.84.22 At COS04 Former Cosham Police Station, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.23 At COS05: Clock House, Spur Road, the HELAA constraints map shows that there are no significant constraints affecting the site. Constraints will have also been considered in the planning permission for the site (ref. 19/00747/OUT).
- 7.84.24 At DF02 Karen Avenue, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.25 At EC02B Land at Halliday Crescent, the HELAA constraints maps shows that the site is covered with a TPO. However, this is not considered likely to be a major constraint to development as the site is currently occupied by a block of garages and hardstanding.

- 7.84.26 At EC11 Southsea Marina, the HELAA constraints map shows that a large part of the site is water and affected by being in flood zones 2 and 3, and so development is assumed to be restricted to a small area of land outside of flood zones 2 and 3. Development is also envisaged to avoid the area of the site in the north east where flooding is at a 3.3% or greater AEP. Impacts on the nearby scheduled monument and listed building of Fort Cumberland can be mitigated through good design, particularly as the proposed development is of a small scale.
- 7.84.27 At HI01 Hilsea Lodge, the HELAA constraints map shows that a TPO covers the site, and there is a listed building nearby. As the site is currently occupied by a large building, it is thought likely that the TPO constraint can be overcome. Impacts on the nearby listed building can be mitigated through good design.
- 7.84.28 At HI04 Land at Pompey Health and Fitness Club, the HELAA constraints map shows that there are no significant constraints affecting the site other than a very small area of flood zone 2 which can be avoided. Impacts on the nearby listed building can be mitigated through good design.
- 7.84.29 At HI13 Territorial Army Centre, Peronne Road, the HELAA constraints map indicates that the entire site is within flood zone 3 and covered by a TPO. There is a scheduled monument (Hilsea Lines) nearby to the north and north west which is also in a conservation area, and a listed building (milestone) nearby to the west. Flood defences are being put in place to mitigate against flooding. The TPO is unlikely to restrict development significantly as the site is currently occupied by some large buildings. Impacts on nearby heritage constraints can be mitigated against through good design.
- 7.84.30 At MI05 Goldsmith Avenue, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.31 At NE01 Connect Centre, Kingston Crescent, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.32 At NE03 Former Police Station, Kingston Crescent, the HELAA constraints map shows that there is a TPO covering the whole site, there are AQMA's adjacent to the site, and there are listed buildings nearby. The TPO is unlikely to be a major constraint to development as the site is currently dominated by a large building. The nearby AQMA's will not prevent development. Impacts on nearby listed buildings can be mitigated against through good design.
- 7.84.33 At NE05 205 London Road, the HELAA constraints map shows that there are no significant constraints affecting the site.
- 7.84.34 At NE06 Blue Anchor PH, 2 London Road, the HELAA constraints map indicates that the site is within an AQMA and there is a listed building nearby to the west. The AQMA does not prevent development, and the impact on the nearby listed building can be overcome with good design.
- 7.84.35 At NE09 9 London Road, the HELAA constraints map indicates that the site is within an AQMA. The AQMA does not prevent development.
- 7.84.36 At NE22 Land at Heathfield Road, the HELAA constraints map shows that there are no significant constraints on site, but there is a listed building (65-67-69-71 Kingston Crescent) adjacent to the south. The impact on the nearby listed building can be mitigated through good design.
- 7.84.37 Site PA03 140 Southampton Road is now proposed to be removed from Appendix 2 of the Plan.
- 7.84.38 At PA16 Amenity Land off Newbolt Road and Bodmin Road, the HELAA constraints map indicates that the site is within an AQMA. The AQMA does not prevent development.

- 7.84.39 At SJ04 61-63 Marmion Road, the HELAA constraints map shows that the site is within a Conservation Area and there are listed buildings nearby. Impacts on heritage assets can be overcome through good design.
- 7.84.40 At SJ16 Wimbledon Park Sports Centre, the HELAA constraints map shows that the northern part of the site is within flood zone 2, with the remainder of the site (which is a car park) is in flood zone 3. There is also a conservation area and listed building nearby. It is anticipated that development will be avoided in the part of the site in flood zone 2, and heritage constraints can be overcome through good design.
- 7.84.41 At SJ17 Queen's Hotel and Grosvenor Casino, the HELAA constraints map indicates that the site is within a conservation area, and the Queens Hotel on site is a listed building, and there are other listed buildings nearby. The Southsea Common historic park and garden is also nearby. Proposed development is anticipated to involve retaining the Queen's Hotel and converting it and potentially adding storeys to it. Impacts on heritage assets can be overcome through good design.
- 7.84.42 At ST01 City Records Office, the HELAA constraints maps shows that the site is within a conservation area, and the railings bounding the site are listed. There are also several listed buildings nearby. A TPO covers the site. Impacts on heritage assets can be overcome through good design, and the TPO is unlikely to be a significant constraint to development if development is restricted to something similar to the original footprint of the existing building.
- 7.84.43 At ST02 Middle Street, the HELAA constraints map shows that there are no significant constraints affecting the site. Constraints will have been taken into account in the planning application for the site, which previously had resolution to grant planning permission, but went to appeal for non-determination, and was dismissed to do lack of S106 (ref. 18/01967/OUT).
- 7.84.44 At ST07 Derelict Land, Warwick Crescent, the HELAA constraints map shows that there are no significant constraints affecting the site. Constraints will have been taken into account in the recently granted planning permission (ref. 23/01613/OUT).
- 7.84.45 At ST12 Cathedral House, the HELAA constraints map indicates that the majority of the site is within flood zone 3, with the remainder being in flood zone 2. This will be overcome through flood defences. The site is in a conservation area and there are listed buildings nearby. The development will involve converting existing buildings, so impacts on heritage assets should be minimal and can be overcome through good design.
- 7.84.46 Site ST13 62 Middle Street is proposed to be removed from Appendix 2 of the Plan.
- 7.84.47 At ST17 Clarence Pier, the HELAA constraints map show that numerous constraints affect the site including flooding, and heritage. Any scheme for this site will need to be carefully designed to address any constraints, and the unique coastal location which the site sits on. However, it is considered possible that constraints can be overcome and an appropriate development accommodated on the site.
- 7.84.48 For the new site to be added to Appendix 2 post-submission of the Plan at ST29 Tipton & Edgbaston House, a site assessment equivalent to the HELAA is provided in the LPS Tower Blocks Topic Paper [PCC16]. The constraints map shows that there are no significant constraints affecting the site.

85) Would each site in Appendix 2 make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery?

- 7.85.1 The opportunities and constraints for each of the HELAA sites within Appendix 2 are documented in the HELAA Report and Appendices 2025 [HO04], and summarised above in the Council's answer to Q.84. Information on how the Council has made optimal use of land is provided in the Council's answer to Question 8 of the Inspectors' Initial Questions (IQR) [PCC06].

- 86) **Has the availability, viability and deliverability of each site in Appendix 2 been appropriately assessed and evidenced? In particular:**
- a. Table 19.1 of the IQR indicates that the best-fit development typologies from the DVA for the majority of the sites within Appendix 2 would be unviable. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?**
 - b. For the applicable sites in Appendix 2, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that development of those sites can otherwise be considered deliverable as defined by Annex 2 of the Framework?**
- 7.86.1 Yes. The availability, viability and deliverability of each site was assessed and appropriately evidenced in the HELAA [HO04].
- a. Table 19.1 of the IQR indicates that the best-fit development typologies from the DVA for the majority of the sites within Appendix 2 would be unviable. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?**
- 7.86.2 Yes, there is sufficient certainty that the sites will come forward as anticipated by the Plan, as documented in the Council's answer to Question 19 of the Inspector's Initial Questions (IQR) [PCC06]. The Council would also like to highlight the Ministerial letter of July 2026 [PCC27] which emphasises the importance of taking an appropriately pragmatic and proportionate approach in respect of deliverability and viability when examining local plans.
- b. For the applicable sites in Appendix 2, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that development of those sites can otherwise be considered deliverable as defined by Annex 2 of the Framework?**
- 7.86.3 Yes. The evidence to support this has been detailed below against each of site identified in Appendix 2 that are anticipated to deliver housing within 5 years of adopting the Plan.
- 7.86.4 For COP01 Brynwell Builder's Yard, the most recent planning application (24/01195/FUL) was dismissed at appeal due to the absence of nutrient-neutrality mitigation measures being secured through the S106 agreement (09.04.2026). As a result, delivery on-site has been moved from 2027/28 to 2029/30. This is reflected in the updated Housing Trajectory. Nevertheless, the site is still included within the 5YHLS as the site is available and there is developer interest, as demonstrated by the recently submitted planning applications. As there is a mechanism for overcoming nutrient-neutrality in Portsmouth, via developers making a financial contribution, it is assumed that a revised application will be submitted and the reason for the appeal being dismissed can be overcome.
- 7.86.5 For COS01 Cosham Health Centre, please refer to paragraph 15.20 of the IQR [PCC06] and the associated housing land supply template for detail. The site has been subject to pre-application advice, and it is assumed that a planning application will be submitted in 2026/27, to be determined during 2027/28, so that conditions can be discharged and the site can deliver completions in 2028/29.
- 7.86.6 For CS06 227-231 Goldsmith Avenue, It is assumed the site is available based on a recent pre application submission. Please refer to paragraph 15.22 of the IQR [PCC06] and the associated housing land supply template for further detail. The site has been subject to pre-application advice, and it is assumed that a planning application will be submitted in 2026/27, to be determined during 2027/28, so that conditions can be discharged and the site can deliver completions in 2028/29.
- 7.86.7 For EC14 Eastney Swimming Pool, the landowner has confirmed the site is available for development and on 01.10.2025, prior approval was confirmed as required and granted for the

demolition of a pre-existing building on site (ref. 25/01034/DEM). Please also refer to paragraph 15.25 of the IQR [PCC06] and the associated housing land supply template for further detail. It is assumed that a planning application for the 6 unit scheme will be submitted in 2026/27, to be determined during 2027/28, so that conditions can be discharged and the site can deliver completions in the same year.

- 7.86.8 For MI07 185-192 Highland Road, full planning permission was granted for part of the site (185-187) for 9 dwellings on 20.03.2026 (ref. 24/00085/FUL). The number of dwellings anticipated for the site has been changed to reflect the amended number from the planning permission. Please also refer to paragraph 15.35 of the IQR [PCC06] and the associated housing land supply template for further detail. As the site was granted full planning permission this year, it is assumed that conditions will be discharged in 2026/27 ready for delivery in 2027/28.
- 7.86.9 For ST03 Open Space at Stone Street, please refer to paragraph 15.43 of the IQR [PCC06] and the associated housing land supply template. The site has had resolution to grant planning permission (23/00863/FUL) since 28.05.2025. It is assumed that a S106 can be put in place to secure full planning permission in 2027/28, with discharge of conditions following in 2028/29, with delivery of completions in 2029/30.
- 7.86.10 For HI02 Land of former supermarket, an application has recently been submitted for the site for 24 dwellings (26/00096/FUL). As a result, the site has been reclassified from developable to deliverable as it is anticipated that the site will secure planning consent and be delivered much sooner now that a planning application has been submitted. This change has been reflected in the updated Housing Trajectory. The application was submitted 29.01.2026, and validated 03.02.2026. It is assumed that the site will secure planning permission within 2027/28, with discharge of conditions taking place during 2028/29, and delivery of completions taking place in 2029/30.
- 7.86.11 For CD04 The Invincible, the site has outline planning permission (18/00848/OUT), with reserved matters approval being granted 07.11.2025. Please refer to paragraph 15.4 of the IQR [PCC06] and the associated housing land supply template for further detail. No progress has been made yet on discharging conditions, and as this is large scheme for 76 co-living bed spaces (reduced to 40 C3 dwellings equivalent when ratio applied), a longer time period for delivering this has been allowed than other sites, meaning it is anticipated this site will discharge conditions in 2027/28, start construction in 2028/29, lasting 3 years, with completion taking place in 2030/31.
- 7.86.12 For CD75 Venture Tower, the site has had resolution to grant full planning permission since 12.12.2025 (24/01089/FUL). Please refer to paragraph 15.8 of the IQR [PCC06] and the associated housing land supply template for further detail. It is assumed consent will be granted in 2026/27, but as this is large scheme for 100 study bedrooms (reduced to 41 C3 dwellings equivalent when ratio applied), a longer time period for delivering this has been allowed than other sites, meaning it is anticipated this site will discharge conditions in 2027/28, start construction in 2028/29, lasting 3 years, with completion taking place in 2030/31.
- 7.86.13 For COS05 Clockhouse Centre, please refer to paragraph 15.21 of the IQR [PCC06] and the associated housing land supply template for detail. The site has had outline planning permission since 24.03.2023. It is assumed that a reserved matters application would be submitted in 2026/27, for determination in 2027/28, followed by discharge of conditions in 2028/29, construction starting 2029/30, and completions being delivered in 2030/31.
- 7.86.14 For HI01 Hilsea Lodge, please refer to paragraph 15.26 of the IQR [PCC06] and the associated housing land supply template for detail. Prior approval was confirmed as required and granted on 03.02.2026 for demolition of the existing buildings on site. It is assumed that demolition will take place and a full planning application would be submitted in 2026/27, for determination in 2027/28, followed by discharge of conditions in 2028/29, construction starting 2029/30, and completions being delivered in 2030/31.
- 7.86.15 For NE01 Connect Centre, please refer to paragraph 15.36 of the IQR [PCC06] and the associated housing land supply template for detail. The site has full planning permission under

two separate permissions (25/00568/FUL and 25/00358/PA) for 191 dwellings combined, granted on 30.09.2025. No progress has been made so far on discharging conditions. It is assumed that conditions will be discharged during 2027/28, for construction to then start in 2028/29, for two years, with delivery of completions following in 2030/31 and 2031/32.

7.86.16 NE05 205 London Road, please refer to paragraph 15.37 of the IQR [PCC06] and the associated housing land supply template for detail. Application 20/00558/FUL was refused 09.03.2023 due to no mitigation measures having been secured relating to impacts on the SPA. As the Council has an established scheme to pay contributions towards to overcome this issue, it is assumed a new application will be submitted in 2027/28, with consent being secured in 2028/29, discharge of conditions following in 2029/30, and delivery of the 8 unit scheme (5 net) in 2030/31.

7.86.17 For ST07 Derelict Land, please refer to paragraph 15.44 of the IQR [PCC06] and the associated housing land supply template for detail. The site has had outline planning consent since 26.03.2025 (23/01613/OUT). It is assumed that a reserved matters application would be submitted in 2026/27, for determination in 2027/28, followed by discharge of conditions in 2028/29, construction starting 2029/30, and completions being delivered in 2030/31.

7.86.18 When the Plan was submitted for examination, FR06 St Wilfrids Church was identified as deliverable site under Appendix 2. However, the formerly vacant church is now occupied by the RCCG Discipleship Centre. The site is therefore no longer considered deliverable (as defined by Annex 2 of the Framework) and the Council proposes to remove it from Appendix 2. This is reflected in the updated Housing Trajectory.