

Portsmouth Local Plan Examination Written Statement:-

PLP 13 Fraser Range

Representor ID Nos:- 60460/60462/60463/60466/61099

This is a Joint Written Statement from Mrs Susan Dewey; Mr Richard Hussey; Mr Richard Scarlett; Dr Nigel Scarlett; and Mr Rod Bailey

Representor References:- 45749, 45750, 45751, 45752, 45753

Policy PLP 13 for the redevelopment of Fraser Range for 134 homes should be deleted.

There is no likelihood of any new sea-wall; flood defence works; or attenuation ponds; being completed before 2030. It is unlikely the 134 homes could be delivered in the foreseeable future, if at all.

The Policy is based on a 2024 Resolution to Grant Permission to part demolish existing structures for the building of a mix of 116 Apartments and 16 houses; 224 car-spaces; a new sea wall and flood defences; a walkway and an access road subject to the prior completion of a S106 Obligation and Planning Conditions. The Resolution followed an earlier proposal to redevelop Fraser for 108 Apartments and 26 Houses in 2019. Both schemes were EA developments.

In 2019, it was recognised the redevelopment presented many “complex challenges with significant financial cost above and beyond that associated with normal development costs” (2019 Planning Statement from Freeth:-<https://publicaccess.portsmouth.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=POD024MO0BJ00>)

In 2019 those costs exceeded £10 million and the Viability Appraisal demonstrated the proposed development would not be viable if affordable housing is required and/or any other financial contributions are sought through S106 obligations.

The scheme proposed re-using the three larger existing buildings and maintaining their scale and massing and providing new development located along the sight-lines of those existing buildings towards the western boundary. In that way harm to historic views from Fort Cumberland would not be as significant.

The proposal was modified in 2023 following a change of ownership. The EA had cautioned PCC in their letter of 23rd February 2024 to be mindful of determining the application because of the site’s exposed position. They had alerted PCC to the applicant’s incomplete knowledge of the repair of the existing sea-defences and the associated costs with flood defences and beach management over the lifetime of the development. They had even questioned whether the scheme was insurable. Furthermore, their Pre-Submission response of 2nd September 2024 remains critical of the Resolution to Grant where it says it *“failed to demonstrate that dry or limited depths of flooding to access routes were achievable.*

It took a lot of protracted negotiations with Historic England to withdraw their objections too and Natural England's final "No Objection subject to...." letter issued in May 2024 only weeks before the Resolution to Grant included a critical commentary of PCC in its "Case History" Section (19/00420/FUL) reflecting the difficulties the LPA has in dealing with a housing scheme in this location.

After 27 months since the Resolution to Grant, the only available documentation the public can view, is an incomplete S106 drafted in February 2025 (with imprecise details on Beach and Asset Management Strategies); and the SCG43 with the Site Owner, dated 30th January 2025.

The SCG states the site will come forward with a *minimum* of 134 units; the Viability Assessment is the 2019 appraisal referred to above; and the detailed requirements of the sea-defence infrastructure is being investigated.

The LPA appears to have done all it can to support a controversial proposal notwithstanding it is (apparently) yet to be able to fully understand the residual life of the existing sea defences where the most vulnerable (the eastern section) hadn't been surveyed.

The risks to future households from inadequate sea-defences and their management shouldn't be underestimated because we already know from Stantec's Report of January 2021, the beach towards the Langstone Harbour entrance at the eastern end of the site was lowering:- see 19/00420/FUL. Most of the site is in Flood Zone 3 and because of heritage constraints associated with the adjacent Fort Cumberland the new development has to be concentrated in that area having the highest probability of flooding from the sea.

Without any detailed beach management strategy or any final asset condition and management strategy, where is the certainty the proposed scheme can be viable? Why too had the landowner taken over such a vulnerable site when, as the EA in their Objection of 13th September 2019 had previously advised PCC:- *"The FRA states that an asset management strategy, in conjunction with the aforementioned beach management strategy, will therefore enable the proposed rock armour to reduce overtopping volumes to acceptable limits. It is important that these documents are produced and agreed prior to planning permission being granted, to ensure that there is clear accountability for both undertaking and funding the necessary work, as any properties constructed after 2012 are not eligible for government Flood & Coastal Erosion Risk Management Grant in Aid, on the basis that properties built in areas at risk have made adequate provision for their own flood risk management in accordance with planning policy. Public money cannot therefore be relied upon"*.

Considering how protracted the negotiations had been to achieve a mere "Resolution" to build 134 homes after five years and then not to have progressed a S106 within 20 months is indicative of the fragility of this scheme, and the prospects that housing is at all suitable in such a vulnerable location.

According to PCC's Planning Portal there were 141 Objections and only 5 in Support.

It makes no sense for the Planning Inspectorate to endorse an allocation for housing so inconsistent with the Local Plan's Coastal Zone Policy PLP 36 either. PLP 36 serves to conserve and enhance the Coastal Zone's visual amenity because its whole character is defined by the wide open spaces facing the City (para 8.96 refers). In that respect PLP 36 more closely aligns with the

“Seafront Masterplan” of March 2021 <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/supplementary-planning-documents/seafront-masterplan-overview>

Endorsing an allocation for housing also exposes a risk that the public ultimately funds the expenses of the sea-defences and their future management over the lifetime of the development in the event the residential management company fails. We already have too many examples of privatising profit and socialising losses and we should learn to be more cautious.

Policy PLP 13 should be deleted on grounds of safety and viability.

Susan Dewey

[REDACTED]

Richard Hussey

[REDACTED]

Richard Scarlett

[REDACTED]

Dr Nigel Scarlett

[REDACTED]

Rod Bailey

[REDACTED]

17th September 2026