

Portsmouth Local Plan Written Statement

Policy PLP 8 St James' and Langstone Campus:- SCG 54

Representor ID:- 49772

The Milton Neighbourhood Forum on 30th August 2024 had submitted a Reg'n 19 response which included these References:- 40865 – 40882 inclusive; 42543, 42544 and 60724.

This Statement will restrict itself to the Statement of Common Ground SCG 54 with the Milton Forum dated 3rd September 2024 relating to PLP8, and in particular Langstone Campus.

The Forum notes that the Inspectors have confirmed that the Statement of Common Ground between Portsmouth City Council and the Milton Neighbourhood Forum (SCG54) forms part of the examination library and has been considered.

We also note that a subsequent Statement of Common Ground (SCG39) was signed between Portsmouth City Council and the University of Portsmouth on 16th October 2024. At paragraph 3.10, that document states that both parties *"agree that the proposed land swap within the Milton Neighbourhood Plan could have significant viability implications for the site"* and that *"this policy requirement has not been included within the Portsmouth Local Plan 2040."*

Meanwhile in answer to to the City Council's Questions on the Site Allocation on behalf of the University of Portsmouth at Appendix 2 of the SCG (Q1 on page 17):- *"Have you given any further thought to the land swap within the Milton Neighbourhood Plan and its impact on the viability of your scheme?"* Freeths Response of 22nd January 2024 was *"The focus of the University's assessment and strategy has been to optimise the residential development potential of the central part of the former campus site..... open space"* concluded with *"There has been no specific assessment of the land use swap and its impact on viability."*

The existence of two Statements of Common Ground expressing materially different positions on the treatment of the Milton Neighbourhood Plan raises a point of clarification relevant to the Inspectors' MIQs.

In particular:

MIQ PLP8 (Open Space) asks whether the policy sets out appropriate development parameters and requirements, and whether the approach to open space is sufficiently clear and justified.

MIQs relating to St James' & Langstone Campus ask how anticipated dwelling numbers have been determined and whether the evidence supporting the allocation is coherent.

The Forum's concern is simply that the Local Plan does not explain:

1. **Why the policy position agreed with the Forum in SCG54 is not reflected in the Plan when Freeths on behalf of Portsmouth University, were in attendance at the Milton Neighbourhood Plan Examination Hearing in 2022 along with the City Council and the Forum?**

Ultimately the Examiner, guided all parties into an acceptable Neighbourhood Plan Policy LAN1, which finally became part of the City's Development Policy in October 2022.

2. How the later PCC–UoP SCG has been taken into account in determining the development parameters, open space expectations, and dwelling capacity for the Campus allocation?

3. What the 1.82ha of developable land actually includes for the purposes of PLP8?

We respectfully suggest that, for the Plan to be considered justified and effective, the relationship between the two Statements of Common Ground and the adopted Milton Neighbourhood Plan should be clearly set out, so that the basis for the allocation and its development parameters is transparent.

The Forum also notes an inconsistency in the evidence base:- the Statement of Common Ground on PLP36 states that the Longshore Way properties are “not on the coast”, whereas the Fraser Range allocation in PLP13 places the entire site within the designated Coastal Zone. As Longshore Way directly fronts the harbour, separated only by the coastal footpath, the basis for this distinction is unclear. This is raised solely to assist the Inspectors in assessing whether the Plan's approach to the Coastal Zone is coherent and justified.”

The Forum does not intend to make oral representations unless the Inspectors consider further clarification necessary.

Rod Bailey

Milton Neighbourhood Forum

17th September 2026