

Statement from the Residents Association of Port Solent (ID 50226) to the Inspectors of the Portsmouth Plan 2040 with regard to the provisional hearing programme for Matter 7 PLP11

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1 Introductory remarks

1.1 The Residents Association of Port Solent (RAPS) welcomes the opportunity to engage with the examination of Portsmouth City Council's 2040 Plan (the Plan) and does so in a spirit of collaborative enquiry, the expectation being that those who live and work in the area can provide valuable insights that can help arrive at deliverable policies.

1.2 Following the Inspectors' *Guidance Notes*, RAPS has referred to documents [KD01](#), [KD02](#) and [KD03](#) but also to [SGC 52](#) the *Statement of Common Ground regarding the Port Solent allocation* (SCG) allocation and to the [Tall Buildings Study](#) (2009).

1.3 This is the third exercise of its kind in twenty-five years: similar submissions to Portsmouth City Council (PCC) planning initiatives were made in 2003 and 2011 while another in 2018, involving the same partnership, Premier Marinas and CBRE IM (the Developers), was shelved. Issues that were deemed insurmountable then remain prevalent and are accountable to stricter legislation than before. For instance: the *Water Environment (Water Framework Directive) Regulations 2017* that set "no deterioration" duties for water bodies; the *Environment Act 2021* that makes drainage and wastewater management plans statutory; the *Planning and Infrastructure Act 2025* that brings into play Environmental Delivery Plans (EDP). Therefore there is little confidence within this community that anything other than cosmetic improvements to the built environment of Port Solent can be delivered in the timescale envisaged.

1.4 The Plan has been written unaware¹ of the [Head Lease 1988](#) (specifically clauses 4.9 and 4.9.3) between Portsmouth City Council and Port Solent Ltd. The Lease covenants (now by Premier Marinas) require building work not to interfere with drainage, sewerage and methane controls (i.e. the leachate barrier). A similar stipulation to maintain and not disturb the leachate barrier forms part of the [Underlease \(1990\)](#) Port Solent Ltd to POSOL (Covenants 14 and 15). We request that the Developers be made aware of these stipulations because the inclusion of Port Solent in [PCC's Tall Buildings Study](#) as an Area of Opportunity (17) has evidently, by virtue of the omission to prohibit such work, given them carte-blanche to excavate at will and sink piles through the leachate barrier.²

1.5 The [RAPS submission, August 2024](#). sought:

- more precise definition of the boundaries of the area to be developed, notably to guard against any encroachment on the marina support facilities;
- reassurances that known risks (e.g. ground contamination and sewerage capacity) would be properly addressed;
- better articulation of the interdependencies between PLP11 and adjacent policies, in particular PLP3 Tipner West and the bridge link from Horsea Island to Tipner West that already featured in the 2003 planning initiative. Our [submission in 2025](#) added road access, ground instability, environmental protection and pressure on local health and education facilities.

1.6 RAPS holds to the positions expressed in both of those submissions and takes this opportunity to expand on those points.

1.7 In so doing, RAPS acknowledges past statements in 2003 and 2011 submitted by RAPS as the Port Solent Working Party. They dealt with similar issues, all in the interest, as now, of protecting and improving the operational success and special character of Port Solent with its unique blend of marina, residential, leisure, hospitality and retail functions close to historic surroundings and incorporating a protected environment.

1.8 Those past submissions were consolidated into the RAPS document [In Place of a Port Solent Neighbourhood Plan \(2020\)](#). This drew on the [Planning Inspector's Report \(2012\)](#), which RAPS is pleased to see has also informed the Site Allocation Policy PLP11 Port Solent. Our Statement therefore demonstrates a high degree of common ground with the Plan's aspirations, while points of divergence and concern are, as already stated in 1.3 above, a reflection of the perceived reluctance by the Developers to engage fully with the constraints that are endemic to Port Solent and the tendency for PCC to understate the importance of the marina and its supporting facilities. RAPS will need more than an un-minuted assurance from PCC Planning Policy³ that no encroachment on the boatyard and its operations will be made.

1.9 While RAPS is pleased to see that PCC has taken on board the concerns previously acknowledged, it is aghast at the glib assertions from the Developers encountered in Appendix 2

¹ The reason being that the City Council's master copy may have been destroyed in a flood. RAPS has a certified copy of the original.

² CBRE summary page 3 to the SCG.

³ Meeting 16-06-2026 between the RAPS Chair and PCC Planning Policy

of the [SCG](#) that reveal an astonishing disregard for the lives and well-being of the very residents that pay their annual Port Solent charge and daily make use of the leisure and hospitality facilities under their governance. There is no evidence that any residents consider Port Solent “dated” and in urgent need of “consolidation and refreshment”. Nor do they express any desire to see apartment blocks placed on elevated ground looming over their cherished neighbourhood (see photo, page 6).

1.10 The developers appear intent on avoiding financial responsibility for infrastructural improvements. In the Appendix to the SCG they say they *would welcome further engagement with the Council and relevant stakeholders to discuss the key supporting infrastructure, namely road, sewage facilities and flood defences...* Not to mention the building of a bridge, the protection of wildlife, the management of contaminated excavations and widespread disruption. Their assertion (SCG 3.10) that Port Solent is “deliverable and viable” requires a robust health check.

1.11 RAPS also acknowledges that the Inspectors have raised similar concerns in their [MIQ](#) - Matter 7, questions 54-59. These are of a more general nature, apart from the specific issue of the bridge link (Q57b), and we believe that our Statement complements rather than duplicates their work.

2 Main concerns

2.1 Environmental

2.1.1 KD 01 5.21 & 5.31, KD 02/03 A163 recognise that the green fields adjacent to the designated development site are identified as Core Areas P48A and P48B in both the HIWWT’s *Solent Waders and Brent Goose Strategy* and the [Statement of Common Ground PCC, RSPB, HIWWT](#) (February 2026). These Core Areas are located within the [Portsmouth Harbour Ramsar site](#). HIWWT was approached for comment and absolutely supports our concerns that the impact of combined effects in adjacent areas as well the individual outlook for Port Solent are properly addressed.

2.1.2 It is one of the privileges of living at Port Solent that our vicinity is shared by spectacular, protected species. It is not clear what measures could be taken so as not to disturb their seasonal habitat when prolonged disturbance from extensive building work and increased dog-walking at the aforementioned Core Areas seem inevitable. Acknowledgement that “sensitivities need to be addressed” (KD03 A163) provides scant assurance that fully-costed mitigation is likely although the commitments to surveys and project-level HRA in A175 are good to see.

2.1.3. While the Planning and Infrastructure Act 2025 introduces Environmental Delivery Plans (EDPs) and a Nature Restoration Fund to streamline mitigation, it remains unconfirmed whether the Solent catchment will be included in the first tranche of rollouts expected in 2026. Furthermore, unknown levy rates and the exclusion of point-source issues—such as local wastewater and sewerage failures—mean EDPs cannot currently be relied upon to resolve Port Solent’s baseline environmental constraints. Consequently, until these mechanisms and their interaction with Portsmouth Harbour’s Ramsar protections are legally and financially clarified, the Plan’s reliance on strategic mitigation is premature.

2.2 Transport links

KD 01 5.22 & 5.33 02 A164 Access/flood risk

KD 01 5.25 & 5.35 03 A33 Bridge link

2.2.1 RAPS is wholly in agreement with the [City Council's response to the Inspectors' initial questions](#) (July 2026) at paragraph 12.8:

...the site has very poor sustainable transport connections, being heavily dependent upon private car use and the A27/M275 road network and consequently requires improvements to cycling, walking and public transport links within existing and new networks, including the proposed bridge. This development requires a secondary access for the site in the event of flooding...

Almost a quarter of a century after the bridge was first proposed and sixteen years after the publication of a [Feasibility Study](#) how much closer is the prospect that such a vital link can be put in place?

2.2.2 Public events at Port Solent attract thousands of visitors. Ample, free car parking is a factor in their success. The footprint for 500 new homes would displace this. We note that CBRE's [illustrative masterplan](#) includes two multi-storey car parks, which we believe are not sanctioned by PCC. How will visitors be accommodated? PCC sources have indicated that this will not be an issue because the City's sustainability policy will persuade everyone to change their travel preferences, switching from car to bus, bicycle or on foot, taking full advantage of the new bridge link. This is an admirable aim, at the heart of *Core Policy PLP2 Climate Emergency* but we do not feel it is realistic. Moreover, a situation could easily arise where home and bridge building schedules fall out of synchronisation with each other and with bus timetabling, thereby isolating the Boardwalk from visitors.

2.2.3 There is general concern about the road layout as a multiple cul-de-sac and the risk that this poses to residents in an evacuation; a point that is well-made in the Plan (*KD 03 8.28 under PLP 31 Flooding*). There is no national guidance on a safe number of residential dwellings in a cul-de-sac. Such guidance is left to local highway authorities and Portsmouth has none. Some transport planning companies, such as [Hub](#), work within 750 or 1000 at the most. At 665 residential dwellings or households, Port Solent already approaches what should be considered good practice. Add 500, let alone 900 dwellings, and the boundary of what instinctively seems safe is crossed if the only exit route for all users is Port Way onto Southampton Road. The bridge link at Tipner with restrictions removed in an emergency would mitigate that risk.

2.2.4 The *Tall Buildings Study* recommends that such developments be placed close to public transport facilities, railway stations in particular. The nearest station to Port Solent is a half-hour walk away.

2.3 Contamination and land instability

KD 01 5.27 KD 02/03 A 171 other risks - contamination, sewer capacity

2.3.1 The author of this statement does not claim any technical proficiency in the matter of ground contamination but it is common knowledge that Port Solent was built partly on chalk landfill (to the north and west) and partly on dumped materials of diverse origin, including military, at a depth of between 4 and 8 meters (to the south and east). Fifty gas vents surround the area proposed for re-development where they have served a vital purpose for four decades.

2.3.2 Port Solent is regarded as a [landfill management success story](#): mitigation of risk for buildings involves gas membranes installed above or below floor slab construction. But there is no cause for complacency. CBRE IM is believed to have commissioned a survey from Arup around 2011 that revealed elevated concentrations of methane and carbon dioxide in the ground but very low or negligible emission rates. None of this is certifiable as the survey report has not been made public.

2.3.3 The fact that there is no public dataset for Port Solent that shows the gas-well layout, contamination concentrations, monitoring procedures, maintenance responsibilities and closure criteria means that there is a critical evidence gap in the Plan. In order to avoid the significant risks associated with excavating and exposing the buried contamination that could render Port Solent temporarily uninhabitable, a developer must provide a management plan for earthworks and materials management, including excavation zoning, reuse criteria, waste classification, stockpile controls and unexpected-contamination protocol.

2.3.4 If the redevelopment will include tall buildings, then further implications arise from piling and foundation work, such as unintentional flooding and escaping gas. As the plans have been laid on the basis of scenarios rather than technically-assured designs (e.g. for basement parking, underground conduits for utility supply and waste extraction, etc.) there is no indication that thought has been given to safeguarding precautions. Existing membranes and gas vents should not be treated as proof of sustained fitness for purpose.

2.3.5 Evidence of ground subsidence is visible at various places south of the marina, notably undulating surfaces that were once flat, such as the Marina Keep road surface and the adjacent green fields. The footpath alongside the David Lloyd gym inclines at an angle towards the edge of the car park which has inclined similarly. In short, the ground on which the new dwellings are proposed to be built is unstable and no planning permission should be granted without prior ground survey and measures agreed to prevent further subsidence.



Photos taken September 2026: top left, outside David Lloyd gym showing lateral subsidence of the pathway and the same at the edge of the car park; top right, gas vent at edge of car park opposite the cinema where the proposed tall buildings will be concentrated and erected on ground that is already at a higher elevation than the rest of the marina thereby dominating the surroundings; bottom, Marina Keep showing buckling of the road surface due to ground movement.

2.3.6 It is fair to state that these flagged constraints associated with reclaimed land and landfill gas are inadequately characterised and therefore unresolvable under present circumstances. Until there is a transparent, independently verified investigation that includes a full risk assessment, design criteria and funded lifetime stewardship there must be no digging and laying of foundations.

2.4 Sewerage and waste water management

2.4.1 RAPS approached Southern Water⁴ via the local MP for comment on the known sewerage capacity constraints at Port Solent. A preliminary assessment carried out as part of their own response to the Plan confirmed a limited capacity to accommodate the proposed number of new dwellings. This capacity can be reinforced at the developers' expense and ideally on the basis of a phased building schedule but this, in turn, implies a prolongation of the disruption and disturbance to residents.

2.4.2 A scheme to prevent the run-off of nutrients into Portsmouth Harbour could be provided but would be delayed or more likely refused if, as is suspected, the local sewerage network administered by Southern Water, lacks headroom.

2.5 Alteration to the character of Port Solent

2.5.1 The Plan radically alters and unbalances the character of Port Solent, splitting it in two: an established residential marina where more than 80% of dwellings have either direct water frontage or a marina berth; and a high-rise housing development aimed at people who will likely have no interest nor opportunity to engage in marina activities. Far from enhancing Port Solent it will create a divided community.

2.5.2. As a marina, Port Solent is not child-friendly. Apart from a small sandpit at the Boardwalk there are no other safe areas for play or adolescent recreation and none are being proposed other than the chronically-delayed Horsea Island Open Space (aka the Country Park). Coupled with the encouragement of more self-propelled transport it is hard to dispel a nightmare vision of walkways afflicted with e-cycles and scooters being ridden anti-socially at all times: the Plan does not foresee this.

2.5.3 The requirement for a Landscape and Visual Assessment (KD03 A183) correctly identifies the need to protect views across to and from Portchester Castle. It also needs to protect vistas from within Port Solent to avoid domination by any single feature, such as tall buildings casting shadow and increasing wind turbulence.

⁴ Email from Southern Water's Future Growth Team to Amanda Martin MP 15 September 2026 refers.

3 Concluding remarks

3.1 The Plan presents a significant, long-term redevelopment of the southern half of Port Solent. It combines residential growth with infrastructure upgrades and mentions, in passing, the environmental constraints and ground contamination.

3.2 Overall, the changes potentially deliver: improved road access and utility supply, flood resilience, and investment; alongside adversely changed character, increased population density, traffic pressures, environmental harm and prolonged construction impacts.

3.3 The developers' aspiration (SCG 3.3 - 3.4) for 1300 new dwellings was rejected by PCC citing insufficient evidence of deliverability. Given the severity of the constraints described above, we are at a loss to understand what evidence allows for 900.

3.4 Although the development envisaged may be technically feasible, the published evidence does not presently justify an assumption that reclaimed land, landfill gas and deep-ground constraints are fully characterised or resolved, nor that sufficient utilities and amenities (in particular, health and educational services - such services as are already under pressure locally) can be provided to support the sustained well-being of Port Solent residents.

3.5 The Statement of Common Ground with developers CBRE IM and Premier Marinas does little more than repeat the same story told since 2003: a story of aspiration that reveals a gap in agency and means to address the site's constraints through to implementation. There are reasons, safe and sound, why previous developers restricted this particular area of Port Solent to parking cars and boats. Let us strive to keep it that way.

AI Declaration

1.3 Legislation overview. Claude 13-09-2026. Q what legislation governing environment conditions, including contaminated ground, has been passed since 2011 applicable to cost and feasibility? The response was selectively used and verified at legislation.gov.uk.

2.1.3 Applicable unknown variables of Planning & Infrastructure Act 2025. Claude 18-09-2026. Heavily & expertly paraphrased.

2.3.3, 2.3.4, 2.3.6, 3.4. Contaminated land at Port Solent. CoPilot 02-09-2026 Q about scale and duration of gas venting at Port Solent and implications for excavation. Response extensively paraphrased and terminology checked.

Whole statement analysed for omissions by Claude 18-09-26. Minor adjustments made to submission.