

**Soundness & Quality Assessment of the
2024 Pre-Submission Portsmouth Local Plan and
the 2025 Pre-Submission Portsmouth Local Plan Addendum
Combined**

December 2025



PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

This assessment is an update to the Soundness & Quality Assessment of the 2024 Pre-Submission Portsmouth Local Plan. It covers both the 2024 Pre-Submission Portsmouth Local Plan¹ (hereinafter referred to as the '2024 PLP'), and the 2025 Pre-Submission Portsmouth Local Plan Addendum² (hereinafter referred to as the '2025 PLP Addendum') combined.

The decision to prepare a Local Plan Addendum follows on from the IROPI (Imperative Reasons of Overriding Public Interest) Opinions provided by Government in [February 2025](#) and [July 2025](#), regarding the emerging allocation of Tipner West & Horsea in the 2024 in the 2024 Pre-Submission Local Plan.

The 2025 PLP Addendum includes a new draft policy for Tipner West (PLP3) that does not harm international nature conservation designations in any way that cannot be mitigated. A small number of other policies, and parts of Chapters, are also be included to take into account new evidence and to comply with the latest Government policies on Planning. These are as follows:

- Policy PLP6: Portsmouth City Centre
- Policy PLP7: Fratton Park & the Pompey Centre
- Policy PLP9: Horsea Island Strategic Open Space
- Policy PLP10: Land West of Portsdown Technology Park
- Policy PLP11: Port Solent
- Policy PLP16: Housing Target
- Policy PLP25: Employment Target
- Chapter 3: Development Strategy
- Introduction to Chapter 4: Strategic Sites
- Introduction to Chapter 5: Site Allocations

¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf>

- Chapter 12: Monitoring (table 12.1 only covers those policies included in the 2025 PLP Addendum)
- Appendices 2 and 3 of the 2024 PLP have now been combined under 'Appendix 2' of the 2025 PLP Addendum

When the above policies, parts of chapters and supporting text (where relevant) are referred to in this assessment, they relate to the 2025 PLP Addendum. All references to other policies, chapters and supporting text (where relevant) relate to the 2024 PLP.

Please also note that paragraph numbers beginning with 'A' relate to the 2025 PLP Addendum except for the paragraphs in the Preface that begin with 0.

As a result of the 2025 PLP Addendum, several evidence base studies have also been updated. This includes, but is not limited to, a new Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA), Housing and Economic Land Availability Assessment (HELAA), Housing and Economic Needs Availability Assessment (HEDNA), the Strategic Transport Assessment (STA) and various topic/background papers. The following evidence base will be referred to in this assessment as follows (in brackets):

- HENDA Final Report ('2023 HEDNA')³
- HEDNA Targeted Update Report ('2025 HEDNA Update')⁴
- HRA of the Portsmouth Local Plan - Regulation 19 ('2024 HRA')⁵
- HRA of the Portsmouth Local Plan - Update for Local Plan Addendum ('2025 HRA')⁶
- SA Report to accompany Regulation 19 consultation ('2024 SA')⁷
- SA Report Update supporting the Local Plan Addendum ('2025 SA Update')⁸

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

³ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-HEDNA-Update-Final-Report-October-clean.pdf>

⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PLP_HRA-2024_FINAL.pdf

⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PLP_SA_FINAL-1.pdf

⁸ [portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf](https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf)

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn’t need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	Growth Strategy	
A	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	The development strategy for the Portsmouth Local Plan seeks to achieve the 'Imagine Portsmouth 2040 Vision'⁹ (detailed in Chapter 2 of the 2024 PLP). The development strategy is set out in Chapter 3: <i>'The development strategy for Portsmouth from 2025 to 2040 is to maximise the potential of developable sites focusing on the strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design.'</i> The strategy is aspirational and positively prepared, but also recognises that capacity for growth in the City is limited by a number of constraints, such as land supply, flooding and nature conservation designations.
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	The key diagram in Chapter 3 of the Plan (figure 3.1) illustrates the island geography of Portsmouth and shows the drivers behind the development strategy and policies. The key factors which have influenced the distribution of development include its island geography, heritage constraints, land contamination, the undersupply of open space provision and the City's susceptibility to flood risk (shown in Figure 8.1 of the Plan). Portsmouth is also surrounded by statutory sites designated for their conservation interest (shown in Figure 9.2 of the Plan), which limits development.
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	The emerging Local Plan notes the key infrastructure needed to support the delivery of the strategic sites, which is summarised in monitoring and delivery frameworks under the relevant policies (PLP3-PLP15).

⁹ <https://imagineportsmouth.co.uk/the-vision/>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		The Infrastructure Delivery Plan (IDP)¹⁰ is the main body of evidence supporting strategic infrastructure requirements, with further site specific infrastructure requirements included in strategic and allocated site policies. Key infrastructure requirements for the strategic sites are as follows: PLP3: Tipner West Flood defences, land raising, land safeguarded for landfall of a new bridge connecting Tipner West to Horsea Island (see figure 4.2), improved off-road pedestrian and cycle provision, local shops (class F2a) and community places/facilities (class F2b) open space provision, reinforcement of existing gas network and wastewater/treatment network. The Harbour School is a Special School and will need to be re-located as part of the re-development of the strategic site. PLP4: Tipner East Flood defences and ground raising, community facilities/uses (including educational provision), a multi-modal transport hub, improved off-road accessible pedestrian and cycle provision, reinforcement of existing utility network, as well as reinforcement of wastewater/treatment network. PLP5: Lakeside North Harbour A new secondary access point, flood management measures and reinforcement of wastewater/treatment network. PLP6: Portsmouth City Centre: Public realm improvements, new green space at City Centre North, improved provision for the market, enhancements to focal points within the City Centre (City Centre North Gateway, Circular Fountain, Portsmouth and Southsea Station and Guildhall Square), sustainable and public transport improvements, educational provision, and localised reinforcement of existing utility network may also be required. Specific Highways work will also be required, including road scheme junctions (details of which can be found in the Infrastructure Delivery Plan (IDP)).

¹⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/IDP-2024-Final-for-Reg-19-1.pdf>

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		PLP7: Fratton Park & the Pompey Centre Provision of an off-road pedestrian and cycle route from Fratton Train Station to the Pompey Centre and Fratton Park, as well as safeguarded land for additional homes (see figure 4.6) and for the connection of the off-road pedestrian and cycle route noted above. Reinforcement of existing utility network may also be required. PLP8: St James' & Langstone Campus Offsite highway network improvements, provision of community facilities (inc. potential future healthcare facilities), safe pedestrian and cycle links from Locksway Road to Longfield Road and across the wider site, open space provision and enhancement. PLP9: Horsea Island Strategic Open Space Land safeguarded for landfall of a new bridge connecting Tipner West to Horsea Island (see figure 4.8), sustainable transport improvements and enhancements, and also the necessary infrastructure to support the provision of the strategic open space and ongoing remediation of the former landfill site. PLP10: Land West of Portsdown Technology Park Adequate access to the site and reinforcement of wastewater/treatment network. PLP11: Port Solent Flood and surface water management measures, reinforcement of wastewater/treatment network and sustainable transport improvements and enhancements. PLP12: St John's College Flood management measures and improved pedestrian access to enable ease of movement through the site. PLP13: Fraser Range Flood defences (including a new sea wall), new walkway, construction of access road, safe and accessible walking and cycling routes around/through the site. PLP14: The News Centre, Hilsea Construction/improvement of vehicular access road from the site onto London Road (A2047) and the A3, infrastructure associated with electric bus depot, pedestrian and cycle links and community uses.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		PLP15: Somers Orchard Community uses/spaces, open space provision and improved pedestrian and cycle links.				
1.	Overall does the local plan policies update clearly articulate the strategy for where and how sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The development strategy for Portsmouth is ambitious, positively prepared and clearly articulated in the Portsmouth Local Plan (PLP). Chapter 3 details the development strategy from 2025 to 2040, which seeks to achieve the '2040 Imagine Portsmouth Vision' (see question A for further detail). It includes a key diagram (figure 3.1) which shows the drivers behind the strategy and policies, as well as the location of the allocated strategic sites in the PLP which are 'mission critical' to achieving the vision. The development strategy and policies are supported by robust evidence base (where relevant) to ensure the deliverability of the Plan over the plan period. These include, but are not limited to, an updated Sustainability Appraisal ^{11,12} , Habitats Regulation Assessment ¹³ (HRA), the Housing and Economic Development Needs Assessment (HENDA) (both the 2023 HEDNA ¹⁴ and 2025 HEDNA Update ¹⁵), the 2025 Housing and Economic Land Availability Assessment (HELAA) (Report ¹⁶ and Methodology ¹⁷), Infrastructure Delivery Plan (IDP) ¹⁸ and the				

¹¹ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

¹² https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum_SA-Report-Update-NTS_v1.1_Sept25_updated-final.pdf

¹³ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

¹⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

¹⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-HEDNA-Update-Final-Report-October-clean.pdf>

¹⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/HELAA-2025.pdf>

¹⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/01-PCC_Housing-and-Economic-Land-Availability-Assessment_Methodology-v3.pdf

¹⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/IDP-2024-Final-for-Reg-19-1.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		Strategic Flood Risk Assessment (SFRA) Level 1¹⁹ and Level 2²⁰. This evidence base shall be discussed in greater detail throughout this assessment matrix. Collaborative cross-boundary working has also taken place for the evidence gathering, formulation of policies and monitoring of the PLP. Details of which can be found in the latest Interim Duty to Cooperate Statement²¹. Key strategic matters include Housing, Employment, Greening the City and Transport. Six strategic objectives have been developed from the vision, and each policy within the PLP achieves one or more of the objectives, which all contribute to achieving sustainable development and are consistent with national policy. Icons are used to illustrate which of the objectives each policy seeks to achieve. Policies within the PLP have been grouped based on 'topics/themes' which focus on a particular area of sustainable development, including Homes, Thriving Economy and Greening the City. Policies have also been considered as part of PCC's Integrated Impact Assessment (IIA)²². Although the main function of an IIA is to consider the positive and negative impacts of any new initiative or policy/plan, how to mitigate any negative impacts and to measure the impact of the PLP, the IIA covers many key areas which relate to meeting sustainable development and in a way, achieving the three economic, environmental and social objectives. Chapters 4 and 5 detail the sites allocated within the PLP, which is where most of the new development will be situated, and also note how they will be delivered through monitoring and delivery frameworks which are provided at the end of each policy. Appendix 2 (as per the 2025 PLP Addendum) also lists the Deliverable and Developable sites identified from the 2025 Housing & Economic Land Availability Assessment (HELAA) (excluding strategic sites and site allocations). The above were all robustly assessed as part of the HELAA which is the main evidence for land supply within the City. The HEDNA also acts as supporting evidence for allocated employment sites. All allocated sites have also been subject to a Strategic Flood Risk Assessment (SFRA) level 1 or 2 and/or a Sequential and Exception Test.

¹⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/climate-emergency/>

²⁰ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/climate-emergency/>

²¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/05/Interim-Duty-to-Cooperate-Statement-March-2025.pdf>

²² https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/KD16_Integrated-Impact-Assessment.IA745854637.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Furthermore, a detailed housing trajectory has been provided (appendix 3 in the 2025 PLP Addendum), which illustrates the expected rate of housing delivery on an annual basis over the plan period. Policies have also been assessed under a SA. The SA has considered the likely effects of the PLP, as well as reasonable alternatives, in order to avoid and mitigate effects of the Plan on sustainability objectives to ensure that the Plan is justified and delivers sustainable development. The SA for the 2024 PLP builds upon the SA work already undertaken to explore alternatives at the Issues and Options stage (2017)²³ and the Regulation 18 draft plan²⁴. A further iteration of the SA (2025 SA Update) has been prepared to accompany the 2025 PLP Addendum. The 2024 HRA, which builds on the HRA for the Regulation 18 Local Plan, was commissioned to assess whether or not any aspects of the PLP would have any effects on the integrity of habitat sites. The 2025 HRA has been prepared to cover both the 2024 PLP and PLP 2025 Addendum and its findings supersede the 2024 HRA. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: All of the sites either allocated or identified in the emerging Plan are supported by robust evidence, most notably the HELAA, which is the Council's main evidence based study of land supply within the City. It follows the methodology as set out in the National Planning Practice Guidance (PPG) (paragraph 005), taking into account a number of factors/sources of information, including:				

²³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Issues-and-Options-sustainability-appraisal.pdf>

²⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		- Assessment area and site size - Desktop review of existing information - 'Call for Sites' submissions (the most recent being spring 2025) - Considering sites currently allocated for alternative uses - Site/broad location survey - Estimating the development potential of sites/broad locations - Suitability - site constraints. - Availability - Achievability - Site Capacity - Site Deliverability and Developability All of the above provided PCC with robust evidence to justify the deliverability and/or developability of sites allocated within the plan period, which is consistent with paragraph 72 of the NPPF. 'Deliverable and Developable sites from the 2025 HELAA (excluding strategic sites and site allocations)' have also been identified in the PLP and form part of the housing supply within the plan period. These are detailed in appendix 2 of the 2025 PLP Addendum. Engagement was carried out with all the landowners of sites allocated within the PLP. In winter 2023 letters were sent out to enquire about the sites' availability, achievability, deliverability and viability. The purpose being to further ensure a policy compliant development is delivered and to determine the likelihood of such sites coming forward within the Plan period. Other areas of discussion included the types of uses allocated and quantum of development. In response to such engagement, a number of Statement(s) of Common Ground (SCG) have been established between PCC and relevant landowners²⁵. The SCGs set out the position and understanding of any key issues in relation to the site between both parties, with the goal being to set out a clear and positive direction for the site(s) allocated. A number of SCGs between PCC as the local planning authority and landowners will be revisited in winter 2025. This in response to work being carried out on the 2025 PLP Addendum. The availability of sites either allocated or identified in the Plan was checked again in spring/summer 2025 whilst working on the 2025 HELAA.

²⁵ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

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		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
3.	Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower? If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence? Does the level of housing provide for an appropriate and justified buffer?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Policy PLP16 sets the Housing target for Portsmouth over the plan period.				
		Through the 2025 PLP Addendum, Policy PLP16 was updated to ensure consistency with the 2024 NPPF and to take account of the new standard method for calculating local housing need. This provided PCC with the opportunity to update the HELAA.				
		The standard method was used as a starting point to calculate the housing need for the City, which comes to 1,019 dwellings pa. This is a significant increase from the need identified through the previous standard method, which was 899 dwellings pa. Nevertheless, based on an array of housing supply sources and the anticipated number of dwellings to come forward during the Plan period (table 6.1), the housing requirement (a 'capacity-based figure') proposed in the PLP is set at least 11,369 net additional homes. The breakdown of which is as follows:				
		- A net annual provision of 588 homes each year over the period 2025-2030; and - A net annual provision of approximately 843 homes each year over the period 2030-2040.				
		Analysis of potential timing of delivery from sites in the HELAA demonstrated that it is not possible to achieve an average of 758 new dwellings per annum in the first five years of the Local Plan. Therefore, a stepped housing requirement has been proposed. The justification for this requirement can be found in the supporting text for Policy PLP16 and the Housing Background Paper ²⁶ .				
		In regards to the sources behind the housing supply, a non-implementation rate of 15% has been applied to the outstanding permissions data to account for the historic difference between the number of homes				

²⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Housing-Background-Paper-2025.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		permitted and the number of homes that were actually built. A further non-implementation discount of 15% has been applied to the deliverable and developable sites identified through the HELAA (appendix 2 of the 2025 PLP Addendum) for the same reason. The above discount ensures a pragmatic approach has been taken to the housing supply. The housing requirement set in the emerging Local Plan is lower than that of the standard method need identified for Portsmouth. However, the figure which underpins PLP16 is a 'capacity-based' requirement based on a level of housing that can be realistically achieved within the plan period. Given Portsmouth's island geography and a number of other constraints, including risk of flooding, large number of nature designations and development viability, it is not possible to meet the housing need identified through the standard method. Nevertheless, no stone has been left unturned in identifying all potential sources of housing supply. The requirement set under Policy PLP16 incorporates all deliverable and developable sites that are anticipated to be delivered over the plan period. This is evidenced by the robust assessment undertaken through the HELAA. The fact that the emerging Local Plan housing target does not meet need is supported by robust evidence and is not inconsistent with national planning policy. It is also worth noting that engagement with neighbouring authorities is helping to meet the City's unmet need. The Fareham Local Plan sets aside 800 homes to help meet the unmet housing need in Portsmouth. Winchester City Council (WCC) (as per their Reg 19 Local Plan) had allowed for 1,900 dwellings to be contributed towards the unmet needs of neighbouring areas in South Hampshire. This number has reduced to 290 units through the examination of the Winchester Local Plan. Portsmouth are allocated 30% of this equivalent to a total of 87 of the 290 units being provided by WCC to meet the needs of its neighbours. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
4.	Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As there is no Green Belt in Portsmouth this question is not applicable, and it has been given a score of 2+ (as outlined in the introduction).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The sites allocated within the PLP are detailed in Chapters 4 and 5. Sites identified for development are within Appendix 2 as per the 2025 PLP Addendum. All sites that were deemed deliverable or developable in the HELAA are either allocated or identified for development in the emerging Local Plan. There are no alternative sites for development due to the constrained geography of Portsmouth. A Site Allocations Topic Paper ²⁷ has been produced, which explains the rationale behind the allocations in more detail. Given its complexity, an additional topic paper on the strategic site of Tipner West ²⁸ has also been produced. Furthermore, the relevant evidence base behind the site allocations is referenced in the supporting text of the associated policies (where applicable). The HELAA acts as one of the main bodies of evidence supporting the allocation and identification of both housing and employment sites, as well as the HEDNA. Chapter 7 of the 2024 SA details the preferred approach in regards housing and employment growth options, and the supporting evidence behind them.				

²⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Allocations-Topic-Paper-RS-Nov-2025-PDF-FINAL-VERSION.pdf>

²⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Topic-Paper-TW-siteNov2025-vFINAL.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: The Milton Neighbourhood Plan ²⁹ (MNP) is the only area in the City designated as a neighbourhood area and its neighbourhood plan is the only one that has been formally made part of the development plan for the City. Paragraph 70 of the NPPF states that 'Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.' No request was received from the relevant body and thus, a housing requirement for Milton has not been identified in the PLP. The plan also acknowledges that in the future, and during the Local Plan period, there may be further Neighbourhood Areas designated. Therefore, criterion 3 under Policy PLP16: Housing Target recognises that 'Neighbourhood Plans that allocate additional land for housing will be supported by the Council providing that they meet local housing need and are in general conformity with the strategic policies of the Portsmouth Local Plan.' This is also reiterated in paragraph A199 of the 2025 PLP Addendum.				
		Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-2	-1	0	+1	+2

²⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/10/Milton-Plan-Final-adopted.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The quantum of development associated with each site allocation is clearly set out in the first criterion of the associated policy. Appendix 2 of the 2025 PLP Addendum, 'Deliverable and Developable sites from the 2025 Housing & Economic Land Availability Assessment (HELAA) (excluding strategic sites and site allocations)', also provides the projected quantum of housing and estimated delivery periods. Furthermore, all policies relating to strategic sites and site allocations also include a monitoring and delivery framework. The framework reiterates the type of development, quantum (if applicable) and the estimated delivery within the plan period, as well supporting infrastructure where appropriate. In terms of mix, any residential development proposals associated with the site allocations will need to adhere to the mix set out in Development Management Policy PLP18: Housing Mix.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
D	What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period? List these targets and the evidence source for this 'need' target?	Strategic Policy PLP25: Employment Target sets out the targets for employment floorspace as follows: - 60,248m ² office floorspace (E(g)(i)) - 14,118m ² research & development / industrial processes floorspace (E(g)(ii&iii)) - 64,380m ² manufacturing / warehousing floorspace (B2/B8) - Total employment floorspace: 138,746 m2 These targets are supported and justified by the 2025 HEDNA Update and the Thriving Economy topic paper ³⁰ .				

³⁰ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/#thrive>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The target of 7,000 new jobs to be created over the plan period is set out in paragraph 7.15 of the PLP (paragraph A204 of the 2025 PLP Addendum) and comes from the Economic Development and Regeneration Strategy. This target is supported by findings in both the 2023 HEDNA (para 14.3) and 2025 HEDNA Update (para 9.29).				
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The targets noted in question D above will be provided from the following sources: - Outstanding permissions at 31 March 2025 - Strategic Sites allocated in the Local Plan (City Centre, Tipner West & Horsea Island East and Lakeside) - Sites allocated for employment in the Local Plan (Land West of Portsdown Technology Park) Further breakdown of the above can be found in Table 7.1: Sources of Employment Land in Portsmouth of the 2025 PLP Addendum. Land West of Portsdown Technology Park (PLP10) has been allocated solely for employment: 12,500 m ² Research & Development E(g)(ii) manufacturing (B2) and/or storage or distribution (class B8). As evidenced in the 2025 HELAA, the site is deemed deliverable as there is reasonable prospect that the site will be delivered within years 0-5 (2025-2030 of the Plan Period). Findings from the HEDNA and 'Approach to Employment Land Study' ³¹ also revealed that the site has potential/is suitable for employment use. Lakeside North Harbour has also solely been allocated for employment (50,000 m ² Office (E(g)(i)(m ²)). As evidenced in the 2025 HELAA, the site is deemed developable as there is reasonable prospect the site will be developed for employment use in years 11-15 (2035-2040 of the Plan Period). Furthermore, the 2025 HEDNA Update also notes that despite there being a potential oversupply of office space in the future, the				

³¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-employment-land-study.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		site, is the City's premier business park and is the primary location for larger office space (para 8.16). The site was found to be unsuitable for housing, as evidenced in both the 2025 HELAA and 2023 HEDNA. Tipner West has been allocated for mixed-use development, part of which is employment (approximately 25,000m² of employment floorspace including marine uses (classes E(g)(ii) and (iii) research and development and light industrial, B2 general industrial and B8 storage or distribution) and ancillary office space;). Following engagement with key stakeholders of the site and through the 2025 HELAA, it is anticipated that the 25,000m² of employment space will be delivered in years 6-10 (10,000m²) and 11-15 (15,000m²) of the plan period. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: The IDP³² assesses the current infrastructure provision across the City, identifies what infrastructure will be needed to support the planned growth set out within the PLP, as well as the bodies/actions that would be required to enable such provision. The associated projects have been shown in the Infrastructure Delivery Schedule (IDS), which is appended to the IDP. It also summarises the cost associated with the infrastructure type, timescales and funding sources.				

³² <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/IDP-2024-Final-for-Reg-19-1.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The areas of Infrastructure covered include Education, Flood Management, Health, Transport, Emergency Services, Utilities and Social Infrastructure (such as leisure facilities and open space). The bodies/key stakeholders associated with such infrastructure are as follows: - Portsmouth City Council Education, South Downs and Havant College, City of Portsmouth College and University of Portsmouth (Education) - Environment Agency, Coastal Partners and Marine Management Organisation (Flood Management) - Portsmouth City Council Health, Hampshire and Isle of Wight Integrated Care Board and Portsmouth Hospital University NHS Trust (Health) - National Highways, Portsmouth City Council Highways, Network Rail, First Bus, Stagecoach, Wightlink, Hover Travel, Gosport Ferries and Brittany Ferries (Transport) - Hampshire and Isle of Wight Police and Crime Commissioner, Hampshire Fire and Rescue and South Central Ambulance Service (Emergency Services) - Southern Gas Networks, Scottish and Southern Energy, National Grid, Mobile UK, Virgin Media, BT, Portsmouth City Council Digital Services, Portsmouth Water, Southern Water and Portsmouth City Council Waste Management (Utilities) - Portsmouth City Council Culture, Leisure and Regulatory Services and Portsmouth City Council Parks and Open Space (Social Infrastructure) The IDP also explicitly notes, where relevant, the infrastructure required to support development that is included within policies for the allocated sites within the PLP. Moreover, necessary infrastructure is noted in monitoring and delivery frameworks, which accompany the strategic site and site allocation policies (PLP3-PLP15). Where applicable, the triggers and potential actions to enable this infrastructure are also noted in the framework(s). Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
10.	Can you demonstrate that the transport and other infrastructure needed to support each growth area or strategic site identified in the local plan policies update: (i) can be funded	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?	The IDP provides detail on the indicative cost for transport and other infrastructure projects necessary to support the City's growth over the plan period (and the likely source of funding), including specific infrastructure to support the strategic sites and site allocations (where applicable) allocated within the PLP. The Council has liaised with infrastructure providers throughout the production of the IDP, who have provided information on the planned infrastructure that is being delivered within Portsmouth. Where this does not accommodate for the growth associated with the Local Plan, further information has been provided on the anticipated need, cost and funding details of any further infrastructure required to support this. Where infrastructure delivery is directly associated with an allocated site, the anticipated delivery mechanisms are identified within the IDP. Not all infrastructure associated with Local Plan growth has secured funding; however, appropriate sources of funding have been identified along with the anticipated timeline for delivery. Once information was gathered from the relevant providers/stakeholders, projects were then prioritised to give an indication of whether they are 'Critical,' 'Essential' or 'Desirable.' As an example, Flood Management has been identified as a critical piece of Citywide infrastructure, as well as for a number of strategic sites/site allocations, including Tipner East, Tipner West t and Fraser Range. For several projects, a large majority of funding has been secured, such as Phase 5 of North Portsea Island Coastal Scheme (Ports Creek) and the Southsea Coastal Scheme. The remainder of funding will likely be sourced via the Government's Flood Defence Grant-in-Aid (FDGiA) fund. For strategic sites and site allocations, the developer/landowner will invest and provide the infrastructure needed to support and enable the growth identified. For instance, at Tipner West, funding will need to be identified prior to any application being approved, and development here will only be able to progress with the provision of new defences. The Strategic Transport Assessment^{33,34} which supports the Local Plan also identifies several mitigation measures to ensure optimal operation of the local and strategic road network following Local Plan growth. Some of these relate directly to strategic and allocated sites, while others are focused on the mitigation required to deal with the cumulative impact of growth. Several other mitigation measures within

³³ https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/Portsmouth-Local-Plan_Strategic-Transport-Assessment-Final-060225.pdf

³⁴ [portsmouth.gov.uk/wp-content/uploads/2025/02/Appendix-Portsmouth-Local-Plan-Strategic-Transport-Assessment-060225.pdf](https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/Appendix-Portsmouth-Local-Plan-Strategic-Transport-Assessment-060225.pdf)

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		Portsmouth's Local Transport Plan 4 (LTP4)³⁵ have also been identified as necessary to deliver in order to further mitigate any detrimental impacts. These have been identified within the IDP and information on their indicative cost and funding has also been provided. PCC will continue to work with developers/landowners, and other organisations, to help secure and deliver the necessary infrastructure to support such growth within the City over the plan period and beyond. Statements of Common Ground between PCC and landowners are also underway, which will address key matters associated with sites, such as infrastructure and/or viability (where applicable). The IDP will remain a live document that will be updated as necessary to reflect changes in circumstances relating to infrastructure needs. It will be updated between Pre-Submission (Reg 19) and Submission (Reg 22), following a bespoke consultation on the IDP in winter 2025. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: The IDP will continue to be updated as necessary to reflect changes in circumstances relating to infrastructure needs. Reviewer Comments:
	Process and Outcomes (see also Toolkit Parts 2 and 3)	
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	Throughout the preparation of the emerging Local Plan, the Council has actively and constructively engaged with key partners. The Interim Duty to Cooperate Statement³⁶ documents those activities, and highlights the outcomes of such activities, demonstrating how Portsmouth City Council has complied with the Duty to Cooperate (DtC). The key cross boundary strategic matters for Portsmouth that affect the PLP and have driven our DtC work are as follows:

³⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/11/74.633-Local-Transport-Plan-2021-Final-Accessible.pdf>

³⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Duty-to-Cooperate-Statement-November-2025.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		• Delivery of New Homes • Habitat Regulation Assessment including Nutrients, Recreational Disturbance, Protected Sites and Biodiversity • Development of a Thriving Economy • Promotion of Sustainable and Active Cross Boundary Transport • Cross Boundary Strategic Sites and Allocations These are discussed fully in the Interim Duty to Cooperate Statement, the latest version of which was published November 2025 to support the Pre-Submission consultation on the 2025 PLP Addendum. Throughout the preparation of the PLP, the Council has actively and constructively engaged with key partners. This statement documents those activities and highlights the outcomes of such activities, demonstrating how Portsmouth City Council has complied with the DtC. There is a range of other less strategic issues that have been raised by the DtC bodies, which may or may not have cross boundary implications. These have been dealt with through representations and amendments to the Local Plan during its preparation.				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: i. The Interim DtC Statement clearly identifies the key cross boundary strategic matters highlighted in question E above. An example of where DtC has been effective in tackling such matters is the PfSH work on Nutrient Neutrality. The PfSH sub region has been proactive in solving nutrient neutrality in the Solent since the introduction of the requirement in 2019 and was the first area in the country to have found a solution to the issue. Steps taken to work effectively on the matter include the identification of nitrogen mitigation sites, the creation of the Solent Mitigation Partnership (SMP) and the successful implementation of multiple Nutrient Mitigation Schemes across the Solent. The City Council will continue to work with the				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		PfSH and the SMP to further identify potential opportunities to deliver nutrient offsetting on sites within South Hampshire. This collaborative work is acknowledged throughout the 2025 HRA. ii. The City Council has approached the Duty to Cooperate in three main ways, which evidence the bodies that have been engaged with thus far. These are as follows: - The main way in which the City Council meets the Duty to cooperate is sub-regionally through the PfSH - Individual duty to cooperate discussions and SoCGs with neighbouring authorities - Individual duty to cooperate discussions and SoCGs with Statutory Undertakers iii. The Interim DtC statement clearly sets out the process, the outcomes of engagement on such strategic matters, as well as any areas of agreement or difference. For each strategic matter highlighted in the Interim DtC, a table of evidence is included which illustrates the steps taken to work effectively on such matters. For Gypsies and Travellers as an example, this included joint working arrangements and/or evidence base, Spatial Position Statements, DtC Statements, as well as representations on Neighbouring LPA's Local Plans and letters. The Interim DtC also includes an appendix which outlines all DtC meetings/events and any outcomes. Such collaborative working may also influence or result in changes to policy making. For example, Policy PLP43: Recreational Disturbance on International Nature Designations of the emerging PLP is based on evidence collected through joint working on the Solent Recreation Mitigation Strategy (December 2017), which is currently under review. The Interim DtC Statement also evidences the ongoing cooperation with partners (including any key projects and working arrangements) to ensure effective joint working past the point of Local Plan submission and the plan period. As an example, the delivery of new homes is a key strategic matter. The City Council will continue to work with PfSH authorities to develop a joined up and considered approach to future distribution housing land supply across the sub region, as well as updating the corresponding SoCG on an annual basis. Furthermore, individual SoCGs are also being sought with neighbouring local authorities to accommodate any unmet housing need from the City. Gosport Borough Council (GBC), Havant Borough Council (HBC) and PCC have been working together since May 2025 as a South East Hampshire group of authorities in order to identify a combined unmet

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		housing and employment need position^{37,38,39,40,41,42,43}. The authorities have a combined housing and employment need, supply and unmet need positions of 18,347 homes and 19,973sqm of employment floorspace. Under the Duty to Cooperate, GBC, HBC and PCC have formally requested EHDC, FBC and WCC to assist in meeting the unmet housing need of 18,347 homes and unmet employment need of 19,973 square metres of new employment floorspace with letters having been sent in October 2025 to this effect. A positive outcome of joint working over the summer has been that a surplus of office floorspace in Portsmouth has been committed to Havant. The Interim DtC Statement will continue to be updated up to examination. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:
F	Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence? <i>For instance, are you seeking to require affordable housing on sites</i>	There is only one aspect of the Local Plan that is not in conformity with national policy as follows: Strategic Policy PLP17: Affordable Homes Policy PLP17 does not specify the type of affordable housing required, including the minimum proportion of social rent homes required. This is inconsistent with national policy (para 64 of the 2024 NPPF). Although analysis from the 2025 HEDNA Update indicates that a policy seeking the provision of at least 75% of rented affordable housing at social rents could be justified (para 4.71), such provision would have a negative impact on the overall viability of affordable housing, which could question the soundness of the Local Plan. Furthermore, social rent is already captured under the 30% affordable housing provision stipulated under criterion 1b of Policy PLP17.

³⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/FINAL_Letter_EHDC_13-10-25.pdf

³⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/FINAL_Letter_FBC_13-10-25.pdf

³⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/FINAL_Letter_WCC_13-10-25.pdf

⁴⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/FBC_Duty-to-cooperate-response.pdf

⁴¹ https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/EHDC_Response-to-PCC-HBC-GBC-Nov-2025.pdf

⁴² https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/WCC_Response-to-Joint-letter-from-Portsmouth-Havant-and-Gosport-BC-Nov-2025.pdf

⁴³ https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/Final_Development-needs-in-our-local-area-notes.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	which are below the threshold of major development as defined by national planning policy?	Nevertheless, social rent will be prioritised compared to other types of affordable housing as it is considered a more affordable option and could benefit a wider range of households, as evidenced in both the 2023 HEDNA and 2025 HEDNA Update. Wording on the above will be included in the Schedule of Changes that will be submitted to PINS along with the PLP. The 2025 SA Update has tested two affordable housing options in Chapter 3. The first option was retaining the proposed policy approach, and the second option was changing the policy requirement to 25% affordable housing with social renting forming 75% of this. It then explains the preferred approach taken by the Council in paragraph 5.2.2. as follows: <i>"Policy PLP17 already sets an ambitious overall target for affordable housing of 30% despite challenging viability conditions in the City. To add in a specific requirement for a certain amount of this to be social rent would have a negative impact on viability such that the overall percentage of affordable housing provision would need to be lowered. The Council prefers to keep the overall provision of affordable housing higher, rather than lowering it to secure more social rented accommodation. Social rent is still a tenure the Council will seek to secure, but the level of this will be determined on a site-by-site basis and will depend on the nature and viability of the scheme in question."</i> It is worth noting that at the time of preparing the 2024 PLP, Policy PLP17 did not set a requirement for 25% of all affordable housing units to be First Homes, as per the 'Affordable Homes Update' Written Ministerial Statement (24/01/21). The reason being that other forms of affordable home ownership were considered more appropriate for Portsmouth and its residents. This was inconsistent with the 2023 NPPF. However, such requirement no longer applies as noted in the 2024 NPPF (footnote 31). Therefore, Policy PLP17 is no longer deemed inconsistent with national policy regarding the provision of First Homes.				
12.	Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: PCC is an active member of the Partnership for South Hampshire (PfSH), which is a partnership formed of twelve local authorities, who share a common goal of achieving sustainable development in the South				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Hampshire sub-region. The PfSH Spatial Position Statement (SPS) ⁴⁴ was approved by Joint Committee in December 2023, and the City Council is a signatory. PfSH also publishes regular SoCGs, the most recent of which was approved by Joint Committee on the 26th September 2023. It sets out the work the authorities are doing together to prepare a new SPS for South Hampshire. Although it is not an upper tier plan with which future local plans need to conform to, the SPS does help inform the preparation of and strategic co-ordination of local plans under the Duty to Cooperate by setting out a number of guiding principles to help deliver sustainable development within South-Hampshire. The emerging Local Plan, where applicable, reflects these principles. For example, Principle SPS7 of the Spatial Position Statement focuses on bringing forward development in a number of strategic locations to maximise housing delivery within existing urban areas, one of which is Portsmouth Urban Area and City Centre. Policy PLP16: Housing Target sets a housing target of 11,369 net additional homes within the Plan Period, seeking to maximise the development potential of developable/deliverable sites within the City. This includes strategic sites and site allocations, as well as those identified in appendix 2 as per the 2025 PLP Addendum. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: As this question is not applicable to Portsmouth, it has been given a score of 2+ (as outlined in the introduction). Reviewer Comments:				
13.	Is the local plan policies update: - in conformity with any 'higher level' plans prepared by the Council; and - properly reflecting provisions of any made neighbourhood plan?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The emerging Local Plan is in conformity with the following 'higher level' plans prepared by Portsmouth City Council:				

⁴⁴ <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		The Portsmouth Economic Development and Regeneration Strategy (PEDRS)⁴⁵. The aim of the strategy is to make Portsmouth a 'great place to invest, learn, live, work and visit and the most attractive place for starting, growing or relocating a business.' This aim accords with the 2040 Vision and consequently, the PLP. Furthermore, policies such as PLP25: Employment Target, PLP26: Safeguarding Employment Land and PLP27: Employability & Skills will contribute to achieving the targets set out in the PEDRS, including the creation of 7,000 jobs. Corporate Plan 2024-2026⁴⁶. The Corporate Plan sets out the Council's mission and priorities for the City for 2024-2026, which will help to achieve the 2040 Vision. The PLP accords with the 2040 Vision and its objectives; each policy achieves one of more the objectives. For example, PLP25: Employment Target seeks to deliver a 'Thriving Economy,' which is one of the six objectives. Climate Change Strategy⁴⁷. The purpose of Policy PLP2: Climate Emergency, within the emerging PLP, is to ensure that new development meets the objectives set out by the PCC's Climate Changes Declaration and Climate Change Strategy. It is a core policy within the PLP, is 'mission critical' for achieving the 2040 Vision and encourages sustainable development within the City. Furthermore, policies PLP33: Sustainable and Onsite Renewable Energy and PLP34: Renewable Energy accord within the objectives set out in the strategy, such as promoting lower carbon fuel and onsite renewable energy sources. Health and Wellbeing Strategy⁴⁸. The Health and Wellbeing Strategy seeks to improve the health and wellbeing of Portsmouth through addressing five areas of priority 'Causes of the Causes.' These include Tackling Poverty, Educational Attainment, Positive Relationships in Safer Communities, Housing and Active Travel and Air Quality. The end goal of this strategy is interlinked with a large majority of the policies within the PLP. Portsmouth Greening Strategy and Delivery Plan⁴⁹. The plan addresses the requirement to provide new, inclusive and equitable greenspace alongside improving, maintaining and protecting our existing green

⁴⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/01/Economic-Development-Regeneration-Strategy-Accessible.pdf>

⁴⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/05/56.308-Council-Plan-2024-accessible-aa.pdf>

⁴⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/12/Climate-Change-Strategy-2022-Accessible.pdf>

⁴⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/05/health-and-wellbeing-strategy-january-2022-accessible.pdf>

⁴⁹ <https://democracy.portsmouth.gov.uk/documents/s46531/Portsmouth%20Greening%20Strategy%20and%20Delivery%20Plan.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		space in Portsmouth, including tree canopy cover. The following policies within the PLP are consistent with the objectives set out in the plan: - PLP38: Green Infrastructure - PLP39: Biodiversity - PLP40: Biodiversity Net Gain - PLP41: Trees & Hedgerows - PLP45: Open Space - PLP46: Local Green Spaces - PLP49: Public Realm Local Transport Plan 4 (LTP4)⁵⁰. The LTP4 details PPC's vision for travel in Portsmouth until 2038, focusing on prioritising sustainable modes of transportation and discourage car dependency. Policies PLP47: Movement and Transport and PLP48: Access and Parking align with several aims outlined in the LTP4, including LTP4 Policy G and C. The Milton Neighbourhood Plan⁵¹ (NP) has been taken into account throughout the production of the Local Plan. This includes Policies STJ1 and LAN1 of the Milton NP, which are relevant to Policy PLP8: St James' & Langstone Campus of the emerging Local Plan. It is important to highlight that paragraph 4.167 relating to Policy PLP8 notes that '<i>reprovision of open space should be provided across the site where development results in a significant loss of existing of existing space.</i>' As this is supporting text and not a criterion set within the policy, it does not supersede the requirements set out in Policy LAN1 of the Milton NP. Nevertheless, a Statement of Common Ground between Milton Neighbourhood Forum and PCC to clarify matters of agreement and disagreement on Policy PLP8 is being produced. The parking standards set out in Policy TSP2 of the Milton NP have also been referenced under Policy PLP8: St James' & Langstone Campus (paragraph 4.175). Furthermore, the Local Green Spaces designated within the Milton NP (ENV1) have been acknowledged under the supporting text for Policy PLP46 of the emerging Local Plan (9.120), as well as Figure 9.1 and the Policies Map.

⁵⁰ [portsmouth.gov.uk/wp-content/uploads/2021/11/74.633-Local-Transport-Plan-2021-Final-Accessible.pdf](https://www.portsmouth.gov.uk/wp-content/uploads/2021/11/74.633-Local-Transport-Plan-2021-Final-Accessible.pdf)

⁵¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/10/Milton-Plan-Final-adopted.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		In terms of housing, paragraph 68 of the 2024 NPPF states that 'where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.' No request was received from Milton Neighbourhood Plan and thus, a housing requirement for Milton has not been identified in the PLP. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Regulation 22 Consultation Statement ⁵² was published to support the 2024 PLP and sets out how the Council has involved residents and key stakeholders in preparing the emerging Portsmouth Local Plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the adopted Statement of Community Involvement (SCI) (2017 and 2023 update). It details how such efforts have shaped the Plan and outlines the main issues raised during consultation. The Consultation Statement was updated following the publication of the 2024 PLP and review of the representations received in relation to the 2024 PLP. However, following the decision to produce a Local Plan Addendum, and after taking advice from the Planning Inspectorate, it was not published. The Consultation Statement will be further updated following publication of the 2025 PLP Addendum and published at submission, in accordance with Regulation 22(1)(c).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2

⁵² https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/FINAL_Consultation-Statement_Reg_22.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The 2024 SA builds upon the SA work already undertaken to explore alternatives at the Issues and Options stage (2017) and the Regulation 18 'draft plan' stage (2021). The 2025 SA Update was prepared to accompany the 2025 PLP Addendum. The overall purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Local Plan. Chapter 5 of the 2024 SA outlines the reasonable alternatives selected; a total of six sets of options (relating to housing, employment and policy options, including HMOs, First Homes, and BNG policies) were chosen to be evaluated against the following SA objectives: - Economy - Town Centres - Sustainable Transport - Climate Change, Flooding and Coastal Change - Housing - Healthy Communities - Historic Environment - Urban Design - Natural Environment - Natural Resources The reasonable alternatives above were based on policy context and extensive evidence base, including how much growth needs to be delivered in the plan period (2020-2040) as per the 2024 PLP. However, the 2025 PLP Addendum now proposes a reduced development at Tipner, a new Plan Period (2025-2040) and addresses the changes to the NPPF. As a result, new alternatives have been identified in the 2024 SA Update (Chapter 3) in relation to meeting affordable housing needs and optioneering for development at Tipner West. These have also been evaluated against the SA Objectives listed above.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>															
		The City's development needs are now as follows (table 3.1 of the 2025 PLP Addendum): <table border="1"> <tr> <th>Housing need</th><th>Housing supply</th><th>Difference</th></tr> <tr> <td>15,285 2025-40</td><td>11,369 2025-40</td><td>3,916 2025-40</td></tr> <tr> <td>1,019 per year</td><td>758 per year</td><td>261 deficit per year</td></tr> <tr> <th>Employment need</th><th>Employment supply</th><th>Difference</th></tr> <tr> <td>107,485m² 2025-40</td><td>138,746m² 2025-40</td><td>31,261 surplus</td></tr> </table> Both the 2024 SA and 2025 SA Update have evaluated all reasonable alternatives and clearly explained why certain alternatives have not been selected. Chapter 6 of the 2024 SA and Chapter 4 of the 2025 SA Update present the appraisal findings of the options against the SA objectives. Chapter 7 of the 2024 SA and Chapter 5 of the 2025 SA Update summarise the findings of the appraisal by providing justification for the preferred approach for each set of options, and reasoning for why other alternatives have not been selected. For example, the 2024 SA concludes that the Council's preferred approach regarding HMOs is Option HMO4: 10% limit within the 50m radius of the application site. This is justified by the Council's success in implementing such a threshold over the past five years and is also used by two thirds of local authorities across the country that control HMO proliferation. Furthermore, the HEDNA also highlights the important contribution HMOs play in meeting an element of affordable housing need. The SA states that other options could lead to (minor) negative effects that may result in unbalanced communities, which would not be consistent with national policy nor foster sustainable development with the City. The 2025 SA Update concludes that the Council's preferred approach regarding affordable housing is Option 1: Maintain the proposed policy approach that requires 30% affordable housing in new development, with the amount of social rented housing being determined through the planning process and viability testing. However, the Council will seek to prioritise social rent as it is a more affordable option compared to others. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:	Housing need	Housing supply	Difference	15,285 2025-40	11,369 2025-40	3,916 2025-40	1,019 per year	758 per year	261 deficit per year	Employment need	Employment supply	Difference	107,485m ² 2025-40	138,746m ² 2025-40	31,261 surplus
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	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Chapter 6 of the 2024 SA and Chapter 4 of the 2025 SA Update adequately present the appraisal findings for the options (housing, employment and policy options) against the SA objectives noted in question 15 above. Tables have also been included in both SAs which effectively illustrate whether or not an option is to have a positive, negative and/or neutral effect against the SA objectives. The effects of such are then explained in the supporting text. For example, all housing growth options identified in the 2024 SA had a positive effect on the 'Housing' SA objective as they seek to meet local housing needs. However, they had a negative effect on the 'Natural Environment' SA objective as such housing would put more pressure on the natural environment. Nevertheless, the SA notes that there is expected to be increasing mitigation measures under such options, such as the provision of Biodiversity Net Gain (BNG).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Under the 2025 SA Update, the emerging Local Plan (the 2024 PLP and 2025 PLP Addendum combined) has been appraised against the ten SA sustainability objectives established. Under the SA objectives, with regard to reasonable alternatives and plan policies, it was concluded that the potential significant and minor effects of the Plan in regards to sustainability were mainly positive and thus,				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		no major changes to the local plan policies were required. The only negative effects identified were in regards to SA Objective 5 (Climate Change, Flooding and Coastal Change). This is due to the development strategy including housing within high risk flood zones. The 2025 SA Update notes that flood mitigation measures will be key in ensuring that any long-term adverse effects are avoided. The 2025 SA Update also concluded that the Plan now has neutral effects in regards to SA Objective 8 (Natural Environment), whereas in the 2024 SA it was concluded that the emerging Local Plan would have significant negative effects. This is largely due to the fact that policy for Tipner West can now be delivered without any adverse effects on international conservation designations that cannot be mitigated. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: An Equalities Impact Assessment was undertaken as part of an Integrated Impact Assessment⁵³ (IIA) for the Local Plan, against the nine protected characteristics (age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). The assessment identified and considered any possible beneficial or detrimental effects that may arise from the policies, and changes were made to policies where necessary to avoid discrimination and negative impacts upon people with protected characteristics. ' For example, criterion 2(j) of Policy PLP6: Portsmouth City Centre was amended to '<i>proposals for Major Development should demonstrate how its design enhances the Centre's appearance, responds positively to</i>				

⁵³ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/KD16_Integrated-Impact-Assessment.IA745854637.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<i>its heritage significance and considers the needs and safety of all its users including reducing crime, through the provision of a design code .'</i> The inclusion of 'for all' in this criterion ensures access is equal. This is consistent with national policy, which notes that planning policies should aim to achieve inclusive places (paragraph 96).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A number of other plans and projects were referenced to form the evidence base for both the 2024 HRA and the 2025 HRA Update. These include: - Eastleigh Local Plan (adopted 2022) - Southampton Local Plan (Core Strategy and Local Plan Review adopted 2015) - Fareham Local Plan (adopted 2023) - Gosport Local Plan (adopted 2015, new Regulation 18 Local Plan dated 2021) - Havant Local Plan (adopted 2011, new Local Plan being developed) - East Hampshire Local Plan (Joint Core Strategy adopted 2014, new Local Plan being produced) - New Forest District Local Plan (adopted 2020)				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		- New Forest National Park Local Plan (adopted 2020) - Winchester Local Plan (Core Strategy adopted 2013, new Local Plan being produced) - Chichester Local Plan (adopted 2015, new Local Plan being produced) - Isle of Wight Local Plan (adopted 2012; new Local Plan being produced) - Solent Disturbance and Mitigation Project (SDMP) Phases 1 to 3 and the resulting Bird Aware Solent mitigation project - Solent Waders and Brent Goose Strategy - Conservation Objectives and Supplementary Advice on the Conservation Objectives for Habitats sites; - Traffic modelling undertaken on behalf of Portsmouth City Council - Partnership for South Hampshire Spatial Position Statement 2023 - The 2022 Water Resources Management Plan (WRMP) published by Portsmouth Water - The 2022 East Hampshire Drainage and Wastewater Management Plan published by Southern Water - The 2024 Water Resources Management Plan (WRMP) published by Portsmouth Water (2025 SA Update only) - The Seafront Masterplan SPD				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Portsmouth is surrounded by several statutory sites designated for their conservation interest, namely the Portsmouth Harbour SPA/Ramsar, the Chichester and Langstone Harbours SPA / Ramsar, the Solent & Dorset Coast SPA and the Solent Maritime SAC. These sites have a special significance for their breeding bird populations (in the case of tern species) and overwintering bird populations of international importance,				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		as well as (in the case of the Solent Maritime SAC) for a range of maritime and coastal habitats. Development proposals can pose a threat to the integrity of such sites and thus, mitigation measures or contributions to such measures are required. Both the 2024 HRA⁵⁴ and 2025 HRA Update⁵⁵ assessed the potential implications of the emerging PLP on such Habitat sites within 10km from the City boundary. The 2025 HRA Update supersedes the 2024 HRA. Based on background research and professional knowledge of the Habitat sites involved. The following impact pathways were assessed in Chapter 6 of both SAs: - Recreational pressure (in Habitats sites and functionally linked habitat); - Loss of functionally linked habitat (SPAs/Ramsar sites in the Solent); - Recreational Pressure in Functionally Linked Habitat; - Disturbance from Construction; - Water Quality; - Water Quantity, Level and Flow; - Atmospheric pollution; - Impacts on Tall Buildings/Structures on Flight Lines and Sight Lines (due to the development proposed at Tipner West); and - Coastal squeeze. Given the development proposed on Tipner West & Horsea Island East as per the 2024 PLP, the following additional impact pathway was also assessed under the 2024 SA: - Direct habitat loss from the Portsmouth Harbour SPA / Ramsar and Solent & Dorset Coast SPA (2024 SA only) If it was discovered that any aspects of the emerging Local Plan were to have an impact on the National Site Network, it was recommended that policies or supporting text be amended accordingly (where relevant), to reference further mitigation measures (Chapter 7 in both the 2024 HRA and 2025 HRA Update).

⁵⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PLP_HRA-2024_FINAL.pdf

⁵⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Apart from the section explained below, both the 2024 HRA and 2025 HRA Update concluded that the emerging PLP would not result in any adverse effects to the integrity of any Habitats sites, either alone or in combination with other plans or projects (para 7.72 and para 7.23, respectively). The only exception is in regards to Policy PLP3: Tipner West & Horsea Island East, whereby the 2024 HRA concluded that the proposed development would result in a direct habitat loss. As a result, the 2024 HRA included a section on Derogations as PLP3 was assessed to give rise to adverse effects that could not be mitigated. However, given the Council's decision to include a new draft policy for Tipner West in the 2025 PLP Addendum that does not cause adverse impacts on international nature conservation designations that cannot be mitigated, Policy PLP3 will no longer result in any direct habitat loss. Minor amendments were made to several policy criteria and supporting text to the 2024 PLP so that the wording was consistent of that in the 2024 HRA. Please refer to question 21 as an example. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, additional criteria and/or amendments to policies have been made in response to recommendations from the 2024 HRA (where relevant). For example, criterion 2j of Policy PLP4 was revised so that the wording was in line with that of the 2024 HRA as follows: "Provide appropriate compensation and mitigation measures to the satisfaction of the local planning authority and Natural England in regard to the Secondary Support Sites P136 and P139 of the Solent Waders and Brent Goose Strategy;				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<u>Any loss of supporting habitat identified in the Solent Waders and Brent Goose Strategy will be mitigated through the provision of replacement supporting habitat of equal or greater quality and quantity that fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds."</u> Moreover, it has been noted in the supporting text when certain criteria within the policies have been amended in response to the HRA. For example, in paragraph 4.39 of PLP4 'Tipner East,' it notes that <i>'the likely significant effects of development have been considered through the Habitat Regulation Assessment (HRA) and several specific development requirements are included in the allocation policy to ensure no adverse impact on the integrity of the international designations.'</i> Policy PLP3 in the 2024 PLP was originally amended to reflect the findings of the 2024 HRA in regards to the requirement for derogation testing. However, through the 2025 PLP Addendum, the policy now proposed no longer causes adverse impacts on international nature conservation designations that cannot be mitigated. Therefore, such recommendations from the 2024 HRA are no longer applicable. Policy PLP3 and its supporting text have been amended accordingly to reflect the findings of the 2025 HRA Update. No other changes to the 2025 PLP Addendum were made in response to the 2025 HRA Update. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
	Housing Strategy					
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for	-2	-1	0	+1	+2
No, we do not meet this requirement		No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
Reason for score: It is explained in the answer provided for question 3 that the Housing Target set in the emerging Local Plan does not meet the housing need of the City as per the standard method. However, the figure which underpins PLP16 is a 'capacity-based' requirement based on a level of housing that can be realistically achieved within the plan period.						

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	your unmet need], can you explain and robustly justify why?	Table 6.1 (as per the 2025 PLP Addendum) sets out how the housing requirement set in Policy PLP16 will be met from a number of sources. This includes the Strategic Sites and Allocations of the Local Plan, identified sites from the HELAA in appendix 2, outstanding permissions, completions (from 2025/26) and windfall sites. Unmet housing need has and continues to be an important cross-boundary strategic matter with neighbouring authorities. There is currently an unmet housing need of 3,915 over the plan period, which equates to 261 homes per year (as per the standard method). Under the adopted Fareham Local Plan (2023), provision of 800 homes has been made to contribute towards Portsmouth's unmet housing need, reducing the amount to 3,116 (208 homes per year). Furthermore, Winchester City Council (as per their Reg 19 Local Plan) has allowed for 1,900 dwellings to be contributed towards the unmet needs of neighbouring areas in South Hampshire, a % of which will go to Portsmouth. Discussions are also on-going with other neighbouring local planning authorities in South East Hampshire namely Gosport and Havant Borough Council which are both at the same stage of plan making as PCC and have unmet development needs and our neighbours of Winchester City Council, East Hampshire District Council and Fareham Borough Council. Details can be found in Statement of Common Grounds (SoCGs), the latest Interim Duty to Cooperate Statement and the Housing Background Paper. Implications of taking no further action for local plan soundness and/or effectiveness: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:
G	Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.	Under Duty to Cooperate, Winchester City Council (WCC) formally asked PCC to assist in meeting their unmet need for Gypsy and Traveller (G&T) accommodation. They did not request a specific amount from PCC to contribute towards the overall unmet need. WCC's GTAA identified an overall need for the following: - 115 pitches for Gypsy and Travellers that met the PPTS planning definition of a traveller - 85 pitches for Gypsy and Travellers that at the time of preparing the GTAA did not meet the planning definition of a traveller -27 plots for Travelling Showperson's

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Havant Borough Council (HBC) formally asked PCC to help meet their unmet housing need of 4,309 dwellings. HBC did not specify an approximate number of homes, they only asked if PCC would be able to accommodate any of the need.				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Given the physically constrained geography of Portsmouth, land supply within the City is limited. As a result, PCC is not in a position to accommodate any of Winchester's unmet need for Gypsy and Traveller accommodation. The same applies to the request from HBC; Portsmouth itself has an unmet housing need of 3,915 over the plan period, which equates to 261 homes per year (as per the standard method). As a result, Portsmouth is not in a position to accommodate such a request. Further detail can be found in the Interim Duty to Cooperate Statement and Statement of Common Grounds with the respective councils.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: Portsmouth is currently unable to accommodate any of the unmet need above. However, PCC will continue to engage with PfSH to resolve this and other sub-regional issues.				
		Reviewer Comments:				
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	Reason for score: The annualised target of approximately 588 homes each year over the period 2025-2030, and approximately 843 homes each year over the period 2030-2040, is based on a provision of at least 11,369 net additional homes during the Plan period (2025-2040). It is clearly set out under policy PLP16. The housing trajectory, illustrating the expected rate of delivery per annum across the plan period is set out in Appendix 3 of the 2025 PLP Addendum. The evidence to justify and support this trajectory can be found in the Housing Background Paper, Site Allocations Topic Paper and the supporting text of Policy PLP16 within the 2025 PLP Addendum. Engagement has also been undertaken with landowners of strategic sites and allocations, whereby the trajectory and potential housing yield has been a topic of discussion. Both the strategic sites and allocations play a crucial part of the development strategy for delivery and implementation of housing supply within the PLP. All policies relating to these sites include a monitoring and delivery framework, which note the type of development, infrastructure requirements, estimated rate of delivery, as well as any delivery mechanisms and triggers where relevant. This information is also summarised in the Monitoring Chapter of the PLP (Chapter 12). The above illustrates that every endeavour has been made to robustly justify the deliverability and/or developability of the strategic sites and allocations, and their role within the housing trajectory. From the year of anticipated adoption, the Council can demonstrate that there is a sufficient housing supply of 5.03 years in the PLP against the total five-year requirement (including a buffer of 20%). Further details can be found in the Housing Background Paper. As part of the Annual Monitoring Report (AMR)⁵⁶, an updated housing trajectory and 5-year housing land supply will also be published every year. The purpose being to monitor the progress and effectiveness of housing delivery within the City. Based on the above, it can be deemed that the Council's strategy for housing delivery and implementation is clearly articulated and justified to support the housing trajectory within the PLP. The Housing Delivery Test Action Plan (HDTAP), in response to the results of the annual Housing Delivery Test (HDT), will assist in monitoring the delivery of housing throughout the Plan period. The latest HDTAP⁵⁷ has been published and will form part of the Core Document Library for the emerging Local Plan.

⁵⁶ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/monitoring/>

⁵⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/06/Housing-Delivery-Test-Action-Plan-2024-2025-accessible-aa.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		(i) The 5-year housing land supply (5YHLS) currently stands at 5.03 years (including a 20% buffer) from the anticipated year of adoption in 2027/28. This evidences that there is a sufficient supply of deliverable sites on adoption and is consistent with national policy. This has been calculated from the various sources of supply, including strategic sites and allocations, that are outlined in table 6.1 of the 2025 PLP Addendum. Further details of the 5YHLS can be found in the Housing Background Paper and also the housing trajectory in appendix 3 of the 2025 PLP Addendum.				
		(ii) There is also a sufficient supply of developable sites beyond the 5-year period for the remainder of the plan period. This is depicted in the housing trajectory as shown in appendix 3 of the 2025 PLP Addendum. For instance, a significant proportion of housing delivery is anticipated in the period 2030/31-2034/35 of the Plan. Sites such as Tipner East, City Centre North (part of the Portsmouth City Centre Strategic Site) and Somers Orchard are expected to deliver a high number of homes during this period.				
		(iii) The 20% buffer noted above was in response to the results from the latest HDT 2023 measurement (published on 12 December 2024), which identified that delivery fell below the City's requirement over the previous three years (26%). As a result, a 20% buffer was required to be applied to the 5HYLS. A HDTAP has been produced in response to the findings of the HDT 2023 and forms part of the core document library for the PLP.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments:				
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: All potential sources of housing supply have been identified and robustly assessed in order to establish a realistic and achievable 'capacity-based' housing requirement target under the PLP, which takes into account the physical constraints associated with Portsmouth. As a result, there is no 'head-room' that can be provided in addition to the anticipated housing supply, given the existing limited supply of land within the City.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council is reliant on 'windfall' sites (sites within capacity of <5 dwellings) to come forward during the plan period; a windfall allowance of 1,185 dwellings (79 dwellings per annum) contributes towards the housing target set under Policy PLP16. Given the constrained geography of Portsmouth, there is limited opportunity for large scale development. Therefore, small scale infilling, such as windfall sites, have become an important source of housing supply for the City.				
		Both the Housing Background Paper and the HELAA provide the rationale for the windfall contribution arising from small sites (1-4 dwellings). Between 2020/21 and 2024/25, an average of 79 dwellings per				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		annum were delivered through windfall sites. This average over a 5-year period evidences that there has been a history of such sites coming forward in Portsmouth. Therefore, it is justified to include windfall sites as a source of housing. The inclusion of 'windfall' sites within the housing supply is also consistent within national policy. As noted in paragraph 73(d) of the NPPF, local planning authorities should support the development of windfall sites through their policies and decisions. Small and medium-sized sites can make an important contribution to meeting the housing requirement of an area. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	Reason for score: Yes, the policies listed below make it clear what size, type and tenure of housing is required: - PLP17: Affordable Homes - PLP18: Housing Mix - PLP19: Housing for Specific Groups - PLP20: Housings in Multiple Occupation The rationale for size, type and tenure of housing proposed under the policies above is based on the findings from the HEDNA alongside advice from our colleagues in the Housing Department at PCC. The tenure mix requirement is set out for two site allocations namely Somers Orchard and St James' & Langstone Campus. A specific tenure has also been proposed under Policy PLP15: Somers Orchard:				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		2. Development proposals for the above-named uses will be permitted provided that they meet all of the following site-specific development requirements: a) Replaces the 272 affordable homes from Horatia and Leamington Houses with new affordable homes; b) Provides 30% of any net additional homes as affordable homes or in the case of a Build to Rent Scheme provides 20% affordable private rented units; The purpose of criteria 2b is to make it clear that the affordable housing requirement is applied to all net additional housing over and in addition to the 272 affordable units (criteria 2a), which are replacing the Horatia and Leamington Houses. Policy PLP8: St James' & Langstone Campus notes that the 417 dwellings allocated under the strategic site includes potential elderly person and sheltered accommodation (criteria 1a). The reference to elderly person and sheltered accommodation has been carried over from the Reg 18 Plan. Through the Schedule of Changes that will be submitted to PINS along with the emerging Local Plan, the supporting text of Policy PLP14: The News Centre, Hilsea will be amended to state that the site may be suitable to also meet the housing needs of older people and other specialist needs through C2 accommodation. The variety of size, type and tenure of housing proposed in the emerging Local Plan is consistent with national policy, in order to create mixed and balance communities (paragraph 64). Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, the emerging Plan addresses the needs of different groups in Portsmouth through the following policies: - Under Policy PLP1: Design, development proposals should consider socially inclusive spaces (criteria 2f.ii), a mix and variety of home sizes and tenures (criteria h) and development which is accessible and adaptable to users' changing needs (criteria j). - Under Policy PLP9: Horsea Island Strategic Open Space, 'the new open space provision ensures the needs and safety of the intended users and the need to provide accessible multi-functional spaces' (criterion 3a). - Policy PLP17: Affordable Homes addresses the need for affordable housing in the City and the type(s) of affordable housing provision which are most suited to the context of Portsmouth and its residents. - Policy PLP18: Housing Mix includes an appropriate mix of dwelling sizes based on the tenure; including market homes, affordable home ownership, general need affordable rented and older persons affordable rented homes. Furthermore, all homes are required to be built to accessible and adaptable standards. - Policy PLP19: Housing for Specific Groups takes into account a number of specialist housing requirements: - o Self-build or custom-build homes; - o Specialist and supported housing, including older persons housing, and children's and young people's housing; - o Purpose built student accommodation; - o Build to Rent homes;				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		○ Communal or co-living homes; and ○ Service personnel and service family accommodation. - Policy PLP20: Houses in Multiple Occupation. There is a demand for HMO accommodation in the City to meet the housing needs of a number of groups, including but not limited to students, young professionals and people with low incomes. - Policy PLP22: Space Standards; development proposals need to comply with, at a minimum, the Gross Internal Area standards as set out in the 'Technical Housing Standards – nationally described space standard⁵⁸.' This policy seeks to ensure adequate living standards and environments for all residents. - Policy PLP24: Gypsies, Travellers & Travelling Showpeople seeks to ensure that any development for new Gypsy and Traveller accommodation is well located and safe, ensuring their needs and wellbeing are taken into consideration. - Policy PLP27: Employability & Skills - development proposals will be permitted where they, as relevant, 'address barriers to employment for economically inactive people including those with protected characters... (criterion 1c).' - Policy PLP28: Town Centres - 'development proposals for main town centre uses should be designed to be welcoming and accessible to everyone (criterion 3),' particularly those with mobility difficulties, such as disabled people and parents and carers with pushchairs (para 7.55). - Policy PLP30: Cultural and Visitor Economy - 'development proposals for culture, leisure, entertainment, visitor attractions and accommodation and creative industries will be permitted where they ensure access to such development is safe and suitable for all users...' (criterion 3c). This will promote community engagement and active involvement, which may in turn improve the quality of life for all (para 7.91).

⁵⁸ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		- Policy PLP35: Air Quality and Pollution - the consideration of air quality issues at the early stage may alleviate health inequalities and consequently, improve the health and wellbeing of individuals. This is the rationale behind criterion 2. - Policy PLP45: Open Space - access to open space can have a positive impact on the mental and physical wellbeing. Criterion 4 notes that <i>'the nature of new open space provision should consider the needs of the intended occupants and that of the local area, and the need to provide multi-functional spaces where practicable.'</i> This will enable such spaces to be accessible to a wider proportion of the City's population. - Policy PLP47: Movement and Transport - <i>'...movement through a site must be a safe, legible and attractive experience for all users...'</i> (criterion 7) and <i>'must be designed to accommodate the needs of people with disabilities by all modes of transport'</i> (criterion 8). This will foster the creation of socially inclusive spaces. - Policy PLP48: Access and Parking acknowledges the provision of parking facilities that are compatible for all users, including those with disabilities and reduced mobility (criterion 6). - Policy PLP49: Public Realm. Well-designed places should provide and/or enhance public realm provision that is safe, inclusive, multifunctional and accessible for all. This is the rationale behind criteria 1a, b and e. - Policy PLP52: New & Existing Community & Leisure Facilities - <i>'development proposals for new and/or expanded community and leisure facilities will be permitted where the site is accessible and inclusive to the local communities it serves;'</i> (criteria 1a). As illustrated above, the PLP positively addresses the needs of different groups within the community. Through these policies, the Council is seeking to create inclusive, safe, accessible and healthy places for all, which is consistent with national policy. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
30.	Can your affordable housing requirements, including any geographical variations, be justified? Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?	Reason for score: Yes, the affordable housing requirements in the emerging Plan can be justified. Both the 2023 HEDNA and 2025 HEDNA Update identify a notable need for affordable housing in the City, which has shaped Policy PLP17: Affordable Homes. A 30% requirement (as a minimum) for onsite affordable homes provision is proposed under Policy PLP17. It is an aspirational figure and illustrates that the Council is committed to addressing the need for affordable housing in the City, even though a specific figure has not been included in the overall 'capacity-based' housing target within the PLP. The proposed tenure mix of affordable homes as 70% affordable rent and/or social rent, and 30% as another affordable route to home ownership (under Policy PLP17) is supported by the rationale set out in the Affordable Housing Topic Paper⁵⁹. There is no geographical variation in the affordable housing target across the City. The HEDNA also helped inform what the need is in Portsmouth for the various mix and types of housing, as outlined in Policy PLP18, including affordable home ownership and affordable rented homes. Based on the analysis and modelling of a range of statistics, a recommended housing mix based on dwelling sizes for different housing sectors was developed. This is shown in table 6.3 as per the 2025 PLP Addendum. The recommended housing mix identified in the 2025 HEDNA Update does not differ from the findings in the 2023 HEDNA. The rationale behind Policy PLP17 and PLP18 is also evidenced in the Affordable Housing Topic Paper⁶⁰. The 2025 HEDNA Update identifies a need for 763 affordable homes per year over the plan period, which is a decrease from the 851 affordable homes per annum identified in the 2023 HEDNA; this is likely due to the change in the Plan period. However, the emerging Local Plan does not explicitly take into account the need for such affordable housing in the overall housing target. As noted in paragraph 0.20 of the 2025 HEDNA Update, 'the link between affordable need and overall need (of all tenures) is complex and in trying to make				

⁵⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Affordable-Housing-Topic-Paper-Oct-2025-final.pdf>

⁶⁰ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/#homes>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home).' This rationale has also been outlined in paragraph 6.19 of the 2024 PLP. Based on the above, it can be deduced that the approach to affordable housing need in the emerging Local Plan is justified. However, that is not to say that an overarching general need for affordable housing has not been identified, as illustrated above. The provision of affordable housing in policies PLP17 and PLP18 seeks to maximise the provision of affordable housing. The delivery of affordable housing will be monitored on annual basis through the AMR. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
31.	Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence? Does the local plan policies update make adequate provision for the identified needs?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, in accordance with the 2024 NPPF, the needs for Gypsies, Travellers and travelling showpeople have been assessed and an updated Gypsy and Traveller Accommodation Assessment (GTAA)⁶¹ was produced in February 2024. The findings of the study revealed that there is no identified need for either Gypsies, Travellers or travelling showpeople. As a result, the PLP does not make provision for such need. It does, however, contain a criteria based policy (PLP24) should a planning application for such development come forward.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: As this question is not applicable to Portsmouth, it has been given a score of 2+ (as outlined in the introduction).				
		Reviewer Comments:				
		-2	-1	0	+1	+2

⁶¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Portsmouth-GTAA-Final-Report.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The findings from the GTAA revealed that there is no identified need for travellers and travelling showpeople accommodation. Therefore, the PLP does not make provision for such accommodation and there is not a 5-year supply of deliverable sites.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: As this question is not applicable to Portsmouth, it has been given a score of 2+ (as outlined in the introduction).				
		Reviewer Comments:				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	No sites have been identified for travellers and travelling showpeople. This is supported by evidence in the updated GTAA.				
	Justified approaches to plan policy and content					
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Justified thresholds are set for the following policies: Criterion 7b of PLP1: Design - 'where proposals for a tall building that fall within 500m of an SPA, SSI, SAC and/or Ramsar sites, and supporting functionally linked habitats, mitigation measures shall be secured....' Upon initial review, the evidence behind this threshold had not been explained in the supporting text. Paragraph 3.49 was amended accordingly to justify the threshold and make it clear.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		PLP2: Climate Emergency - <i>'development proposals for major development must be supported by a Sustainability Statement...'</i> This threshold is justified by evidence which is clear in the supporting text for the policy (paragraph 3.72), and also within the supporting text for Policy PLP33 (paragraph 8.57). Criterion 2j of PLP6: Portsmouth City Centre - <i>'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.'</i> The justification for this threshold can be found in the supporting text (para A80). The importance of design codes are also evidenced in the National Model Design Code. Criterion 2l of PLP6: Portsmouth City Centre - <i>'Proposals for Major Development should provide a travel plan to demonstrate how it is contributing to a shift to sustainable and public transport in in the Centre.'</i> This threshold is justified in the supporting text (para A73) and is in line with the objectives of the Local Transport Plan (LTP4). Criteria 1a-b of PLP17: Affordable Homes - development proposals for major development will be permitted where they make on-site provision for a minimum of 30% affordable homes, of which 70% is to be affordable rent and/or social rent, and 30% as another affordable route (inc. shared ownership or discounted market sales housing). The rationale for this criterion can be found in the supporting text (para 6.34-6.35) and is justified by the findings from the HEDNA. Criterion 2 of PLP19: Housing for Specific Groups - <i>'development proposals involving more than one self-build or custom-build on a site must be supported by a design framework'</i>. Upon review, there was no rationale for why a design framework needed to be submitted as part of a development proposal for self-build or custom-build. It was agreed that this criterion is sufficiently covered under Policy PLP1: Design (criterion 3). Therefore, the criterion was removed from Policy PLP19 accordingly. Criterion 1a of PLP20: Housing in Multiple Occupation (HMO) - <i>'...development proposals for new HMOs and changes of use to a HMO, including development to increase the occupancy of an existing HMO, will only be permitted where: less than 10% of residential properties within a 50-metre radius of the area surrounding the application property are in existing use as a HMO.'</i> The concentration test set in Policy PLP20 is based on the SPD 'Houses in Multiple Occupation (HMOs) – Ensuring Mixed and Balanced

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		Communities'⁶², which was adopted in October 2019. The 10% rule as it currently stands has been applied by the Council in relation to several applications in recent years and it has also been considered on appeal in a handful of cases. Almost without exception the appeals have been dismissed on the basis that the schemes in question would breach the 10% rule set out in the SPD and therefore create imbalanced communities. The use of the 10% rule is also supported in the SA prepared to support the emerging Local Plan, which concludes that of the options considered (which included the use of a 5% rule) the 10% rule was the best option on the basis that it <i>"aligns with the existing evidence that supports a level of HMO development whilst avoiding 'imbalanced' communities and is more likely to continue baseline trends with neutral effects"</i>. Upon review, it was deemed that the rationale for this criterion was not explicitly clear in the supporting text. In response, paragraph 6.106 was amended to reiterate the validity of the HMO Supplementary Planning Document (SPD)⁶³ as evidence. Criterion 3 of PLP35: Air Quality and Pollution - <i>'major development proposals will be required to undertake an accompanying Health Impact Assessment (HIA) ...'</i> Upon initial review, there was no rationale in the supporting text for this requirement. The rationale for this criterion is noted in the supporting text (paragraphs 8.84 and 8.85). Criterion 1a of PLP40: Biodiversity Net Gain - <i>'development proposals (except exempt development) will be permitted where they demonstrate at least a 10% net gain for biodiversity, accounted for in a biodiversity net gain plan.'</i> The rationale for this criterion can be found in the supporting text (paragraph 9.51). Criteria 1c of PLP40 Biodiversity Net Gain - <i>'development proposals within the strategic sites of Portsmouth City Centre and Lakeside and the allocation site of Somers Orchard will be permitted where they demonstrate a 20% net gain for biodiversity accounted for in a biodiversity net gain plan.'</i> The 20% BNG target is an aspirational figure for the City Council and PCC-owned sites. This rationale for the 20% target will be evidenced in a topic paper⁶⁴. Criterion 1c.i of PLP41: Trees & Hedgerows - tree canopy cover of at least 15% to be provided on new major development. This is supported by/in line with the Natural England Green Infrastructure Urban Tree Canopy Cover Standard. The rationale for this criterion can be found in the supporting text (para 9.61).

⁶² <https://www.portsmouth.gov.uk/wp-content/uploads/2022/02/Houses-in-multiple-occupation-HMO-spd-Accessible.pdf>

⁶³ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/02/Houses-in-multiple-occupation-HMO-spd-Accessible.pdf>

⁶⁴ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/#green>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Criterion 3 of PLP45: Open Space - 'development proposals for 50 or more new homes will be permitted where they provide an area of open space to the ratio of 1.65 ha per 1,000 people...' Upon initial review, the rationale for this criterion was not explained in the supporting text. In response, paragraph 9.110 was amended accordingly. The standard of 1.65 ha per 100 people for development proposals for 50 or more new homes is in line with the Council's Open Spaces Addendum⁶⁵.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: Upon review, it was discovered that some of the policies noted above with thresholds and/or which trigger specific policy requirements were not justified in the supporting text (those highlighted in red). As a result, the following amendments have been made: - Supporting text was added to justify criteria 7b of Policy PLP1 (paragraph 3.49). - Criteria 2 of PLP19 has been removed as it is covered under Policy PLP1. - Supporting text added to justify criteria 1a of Policy PLP20 (paragraph 6.106). - Additional text added to Appendix 4 regarding the marketing requirements outlined under Policies PLP26, PLP28 and PLP52. - Supporting text added to justify criteria 1a,1c and 2b of Policy PLP29 (paragraphs 7.66 and 7.67). - Supporting text amended to justify criteria 3 of Policy PLP35. - Supporting text amended to justify criteria 3 of Policy PLP45 (paragraph 9.110). - Although there was no text added to explain the rationale for the 20% BNG requirement under Criteria 1b of Policy PLP40 Biodiversity Net Gain, a topic paper is currently being produced, whereby the rationale for the 20% will be explained.				
		These changes meant that the score for this question moved to the right, reaching +2. Reviewer Comments:				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our

⁶⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Addendum-to-2018-Open-Spaces-Study-2021_compressed.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?					plan will meet this requirement
		Reason for score: The emerging Plan avoids deferring details on strategic matters to other documents as the Plan itself provides the strategic development strategy for the City in its entirety. Detailed guidance on specific implementation or application of a policy can be found within relevant SPDs, such as the Housing Standards SPD ⁶⁶ (referenced in criterion 6 for policy PLP17).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	Reason for score: Hierarchies are defined in the following policies: - The Portsmouth Town Centre Hierarchy (figure 7.2) is defined in Policy PLP28 (which outlines the hierarchy), and is reflected consistently throughout the Plan where applicable, such as PLP29 and PLP30. Criterion 2 of PLP28 states that '<i>Proposals for new development should be of a size, scale and type appropriate to the centre's position in the town centre hierarchy, as shown in Figure 7.2.</i>' This is consistent with National Policy (refer to para 90 of the NPPF). - Designated Nature Conservation sites in Portsmouth (figure 9.2) The hierarchy of sites, habitats and species is defined in criterion 2 of Policy PLP39: Biodiversity. They are 'International Designations,' 'National Designations,' 'Irreplaceable Habitats,' 'Local Designations' and 'Outside of Designated Sites' which include priority habitats and non-statutory designations such Biodiversity Opportunity Areas. The level of protection afforded to each site is set out clearly in Policy PLP39, depending on their status within the hierarchy. For example, development proposals which may				

⁶⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/04/Housing-Standards-Supplementary-Planning-Document.pdf>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		impact on international designations (SPA, SAC or Ramsar sites) will be subject to a HRA (criterion 2a.i), whereas those that may impact national designations (SSSI or NNR) will be subject to an Environmental Impact Assessment (EIA) (criterion 2b.i). This hierarchy is reflected consistently throughout the Plan where applicable, including policies PLP3, PLP4, PLP5, PLP8, PLP9, PLP11, PLP13, PLP39 and PLP42. This is consistent with national policy (refer to NPPF paragraph 181). - The level of protection afforded to Heritage Assets is dependent on their significance/value within the historic environment. The hierarchy relating to heritage assets is defined in Policy PLP53 and it is clear the level of protection afforded, depending on their significance/value within the historic environment. For example, criterion 2 of PLP53 notes that '<i>substantial harm to, or loss of assets of the highest significance (Scheduled Monuments, Grade I, and II* listed buildings and registered parks) should be wholly exceptional and should only occur where a robust justification has been made in accordance with the requirements of the NPPF.</i>' Whereas the degree of protection required for non-heritage assets differs: '<i>proposals for alteration and/ or extension that conserve or enhance the significance of non-designated heritage assets will be supported</i> (criterion 6 of PLP53). This is consistent with national policy (refer to paragraphs 205-209). The hierarchy is reflected consistently throughout the Plan where applicable. This includes policies PLP3, PLP6, PLP8, PLP10, PLP12, PLP13 and PLP15. - An energy hierarchy is referenced under criterion 3 of PLP33, stating that '<i>all developments must follow the principles of the energy hierarchy....</i>' Figure 8.5 illustrates how the energy hierarchy is implemented. This is consistent with national policy (refer to NPPF paragraphs 160-164). The hierarchy sets out principles that all developments must follow and does not relate to any designations. Therefore, a level of protection is not applicable.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
36.	Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]	Reason for score: The following policies within the emerging Plan seek to limit certain uses: Policy PLP3: Tipner West. Criterion 4 seeks to prevent development on Land south of the Firing Range in order to retain its role as terrestrial SPA and Ramsar: <i>'Land south of the firing range is designated as terrestrial SPA and Ramsar and should be retained as such without any development built on it other than sea defences as necessary. Developers will need to demonstrate, as part of a Site Management and Maintenance Strategy, to be approved by the Local Planning Authority, how this land will be protected with particular regard to the control of public access.'</i> The justification for the above is supported by paras A34 and A58 under Policy PLP3. It is also evidenced in the 2025 HRA Update and Tipner West Topic Paper. Policy PLP7: Fratton Park & the Pompey Centre. Criterion 2 seeks to safeguard land for additional homes and thus, development proposals that would prevent such delivery will not be permitted: <i>'Land is safeguarded for additional homes on the car park of the Pompey Centre as shown on the Policies Map and figure 4.6. Development proposals will not be permitted in the safeguarded area where it could prevent the future delivery of the new homes.'</i> The justification for the above is that the City has an unmet housing need. By not permitting development that would prevent such delivery illustrates the importance of identifying and protecting sites for housing. Policy PLP20: Houses in Multiple Occupation. The policy seeks to limit the concentration of HMOs within an area, in order to support mixed and balance communities. Development proposals for HMOs will only be permitted where: - <i>'Less than 10% of residential properties within a 50-metre radius of the area surrounding the application property are in existing use as a HMO' (criterion 1a) and</i> - <i>'Development does not result in a non-HMO property being 'sandwiched' between HMO properties and does not result in three or more HMO properties in a row' (criterion 1b).</i>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		The justification for the above can be found in the HMO Supplementary Planning Document (SPD), which is referenced in the supporting text (paragraph 6.106) and appraised in the Sustainability Appraisal. Policy PLP29: Small Local Shops. Under criterion 1, development proposals for small local shops or services outside the City, Town, District, Local and Neighbourhood Centres will be permitted provided that: - <i>'The net sales area is less than 150m²'</i> (criterion 1a) and - <i>'There is no other such facility within a reasonable walking distance (approximately 400 metres)'</i> (criterion 1c) The rationale behind the above is to ensure that vitality and viability of designated city, town, district or local centres is not negatively impacted, which is consistent with national policy and guidance. The justification for a net sales area of less than 150m² and 400m walking distance is clear in the supporting text (paragraph 7.66). Policy PLP33: Sustainable Construction and Onsite Renewable Energy. Criterion 6 of PLP33 notes that <i>'development proposals that are powered by solid fossil fuels will not be permitted.'</i> In this instance, the policy seeks to reduce the use of fossil fuels and encourage alternative, renewable sources of energy. This is in response to the actions set out in the DEFRA Clean Air Strategy (2018)⁶⁷ to improve air quality, which is referenced in the supporting text (para 8.62). This criterion is consistent with national policy (paragraph 160). Policy PLP48: Access and Parking. Under criterion 1 <i>'development will be permitted where it is located and designed in such a way that it seeks to discourage car use and encourages travel by other modes, unless off street parking provision can be justified. This could include car free development.'</i> This criterion is supported by the Portsmouth LTP4 vision and strategic objectives (referenced in paragraph 10.33), the Parking Strategy (one of the 'daughter transport strategies' to support the over-arching transport strategy) and the Strategic Transport Assessment (STA). It is also consistent with national policy (refer to NPPF paragraphs 114). Under criterion 3 of Policy PLP51: Electronic Communication and Utilities Infrastructure, <i>'development proposals for all residential and non-residential buildings will be expected to be served by superfast</i>

⁶⁷ <https://consult.defra.gov.uk/airquality/domestic-solid-fuel-regulations/>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		broadband connection as a minimum and full fibre connections where available.' The rationale for this is included in the supporting text (para 10.77). The support for full fibre broadband is consistent with national policy (refer to NPPF paragraph 118).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
37.	Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code? [For example, onsite provision of open space, optional technical standards, internal and external space standards.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Standards proposed within the PLP are as follows: - Criteria 2a-j under PLP1: Design are consistent with themes highlighted in the National Model Design Code⁶⁸, such as Context, Identity and Movement. These are important aspects for all development proposals to consider in order to contribute towards high quality design and place making within the City. Criterion 3 relates to large-scale major development and and/or development of sites within a sensitive location. It explicitly references the National Design Guide⁶⁹ and National Model Design Code, stating that any design codes or guides submitted as part of the development proposal should address the above documents/guidance from the Government. This is also consistent with paragraphs 133-134 of the NPPF. - Criterion 1a of Policy PLP22 requires all development proposals should comply with the "Technical Housing Standards – nationally described space standard"¹¹⁵ (or future equivalent).' This is to ensure all homes have sufficient space to meet the daily needs of the occupant(s).				

⁶⁸ <https://www.gov.uk/government/publications/national-model-design-code>

⁶⁹ https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		- Under criterion 3a of Policy PLP18, all homes are to be built to accessible and adaptable standards to meet requirements of Building Regulations M4(2). This is in response to future changes to the Building Regulations, which will require all new homes to meet M4(2) requirements, regardless of the scale of development. - Criterion 1c.i of Policy PLP41 proposes that tree canopy of at least 15% is provided on new major development. This is in line with guidance produced through the South Coast Tree Standards, as noted in paragraph 9.61 of the PLP. - Policy PLP45 sets out open space requirements for new development (table 9.1). The standards set out in the Policy are based on the evidence contained in the Council's Open Spaces Study Addendum (2020).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
	Deliverability					
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council commissioned an updated Viability Assessment ⁷⁰ for the 2024 PLP. The assessment has suitably tested all the policies of the 2024 PLP and the following across different development typologies: - Affordable Housing (including tenure split)				

⁷⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PCC-Development-Viability-Assessment-Update_2024.pdf

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		- Community Infrastructure Levy (CIL) payments - Future Homes Standard (based on Option 1) - Fire Safety Standards - Cost of Solent Recreation Mitigation and Nutrient Neutrality - BNG provision (on-site and off-site) - Infrastructure Delivery (inc. transport) - Mandatory EV Charging Points - Open Space provision (on-site and off-site) - Accessible and Adaptable Standards under Part M of Building Regulations The changes made to the Plan at the Addendum stage were not considered to impact whole Plan viability. Therefore, it was deemed not necessary to commission an updated Viability Assessment. There are, however, viability issues with individual allocations which have been addressed in individual Statements of Common Ground. The policy with the largest viability deficit is PLP3: Tipner West as per the 2025 PLP Addendum. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Having considered the results of the various appraisals and the impact of the range of policy requirements set out in the Viability Assessment, the Council recognises that viability is very tight, particularly where it relates to the emerging Local Plan's affordable housing provision requirement. The Viability Assessment notes that the Council should reconsider an appropriate affordable housing target. As noted previously, criteria 1a-b under policy PLP17 seeks 30% Affordable Housing, split 70% Affordable				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Rent or Social Rent and the balance as another affordable route to home ownership (including Shared Ownership or discounted market sales housing). A number of appraisals were tested based on such provision on different typologies. The Viability Assessment states that the 30% affordable housing requirement would result in the majority of development being unviable when subject to the policies set out in the Pre-Submission Plan and national requirements. However, the Viability Assessment highlights that the results of its appraisals do not, in themselves, determine deliverability of development, and are one of a number of factors the Council needs to consider. It is important to highlight that there is a significant need for affordable homes (justified by both the 2024 HEDNA and 2025 HEDNA Update) and as a result, the Council seeks to set an ambitious target. Furthermore, as evidenced in the Viability Assessment and also the Affordable Housing Topic Paper, PCC has a good track record of delivering Affordable Housing from market- led housing schemes and actively enabling delivery, with a large number of major development schemes reaching or exceeding the 30% requirement. Therefore, the 30% requirement under Policy PLP17 has remained and is considered to be justified. Further information on this matter is set out in the Affordable Housing Topic Paper. The policy includes a criterion (PLP17 3.a) requiring development proposals that do not meet the policy requirements for affordable housing to provide an open book viability assessment. This embeds a reasonable level of flexibility into the emerging Local Plan to enable development to respond to changing viability over the plan period. In this regard, the Viability Assessment recommends that the Council keeps viability under review, and where policy requirements are flexed, the Council includes review mechanisms. These mechanisms are included at criteria 4.a. b. and c. of PLP17, requiring development proposals permitted, that do not meet the affordable housing policy requirement, to be subject to early stage, late stage and mid-term reviews.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
		-2	-1	0	+1	+2
40.		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets	Yes, we are likely to meet this requirement	Yes, we are confident our plan

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?			this requirement or not		will meet this requirement
		Reason for score: Yes, Chapter 12 of the emerging Local Plan details the monitoring framework, which clearly sets out what matters (referred to as 'targets') associated with the policies will be monitored, along with the relevant indicators (where applicable). Careful consideration has been taken when formulating these indicators to ensure that they are specific, measurable, achievable, relevant, and time-bound (SMART) and can be monitored through the Authority's Monitoring Report (AMR) on an annual basis. Not all policies have been included in the monitoring framework, as for some it was deemed there were no appropriate indicators to monitor their performance. For example, Policy PLP37: Contaminated Land has not been included; the presence of contamination depends on the context and location and will be considered on a case-by-case basis. The monitoring frameworks for policies included in the 2025 PLP Addendum have also been reviewed and updated where relevant.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u> ? Where triggers for plan review and/or update are identified are they justified and proportionate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, Chapter 12 of the emerging Local Plan includes a table which clearly sets out a framework for review of the Plan, including the relevant policies, targets, indicators and partners, delivery mechanisms, and also triggers and actions required if the policy is not being achieved. The triggers are proportionate to the type/scale of development being proposed under the corresponding policy. The outcome of annual monitoring will inform consideration of whether a review of the Local Plan, or certain policies, is needed. Updates to national policy, evidence or other changed circumstances will also be considered.				
		Implications of taking no further action: N/A				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments:				
	Plan effectiveness (and associated policy clarity)					
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		The time period for the emerging Local Plan is set out in Chapter 1 of the 2024 PLP. It is also referred to in the policies and supporting text as and when deemed appropriate.				
		Following work on the 2025 PLP Addendum, the plan period changed from 2020-2040 (as per the 2024 PLP) to 2025-2040. This is clearly stated in the Preface of the 2025 PLP Addendum and also Chapter 3. This decision was justified as it removes five years of historic development from the Plan and ensures that it is forward looking and positively prepared. As a consequence, the strategic policies within the Plan now only look ahead over a 13-year period from the anticipated date of adoption, rather than 15 years. This is inconsistent with national policy. However, if the Council had extended the end of the plan period to achieve 15 years, substantial changes would have been required to the evidence base and thus, progress on the Plan would have been further delayed. Therefore, it is considered that the 13-year time period is justified. This was discussed with our advisory Inspector, who wrote that 'Rebasing the start of the plan period to 1st April 2025 is justified and reflects that the standard method is forward looking.'				
		References to the time period for the Plan were also included in policies and/or supporting text of the 2024 PLP which have not been subject to the Addendum process. Therefore, these will be updated accordingly through the Schedule of Changes that will be submitted for examination.				
		The contents pages in both the 2024 PLP and 2025 PLP Addendum clearly state which policies are strategic, and it is noted against the policies themselves throughout the Plan.				
		As noted in paragraph 22 of the latest NPPF, 'policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.' However, this relates to larger scale				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		developments, such as new settlements or extensions, which is not applicable to development proposed in the emerging Local Plan. That being said, Policy PLP46 relates to the designation of Local Green Spaces (LGS) which, as per paragraph 106 of the NPPF, should be 'capable of enduring beyond the end of the plan period.' The evidence supporting Local Green Spaces provides a robust basis for their designation of LGS with an intended permanence for the longer term. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, appendix 1 lists all the policies that are to be superseded by the emerging Local Plan. These include extant policies from the 'Portsmouth City Local Plan 2001-2011,' 'The Portsmouth Plan (Portsmouth's Core Strategy) 2012,' the 'Somerstown and North Southsea Area Action Plan (AAP) 2012' and the 'Southsea Town Centre AAP 2007.'				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Six strategic objectives have been developed from the Imagine Portsmouth Vision, and each have their own corresponding icon. Descriptions of the objectives can be found in Chapter 2 of the 2024 PLP. The icons have been inserted next to each policy to clearly illustrate which objective the policy is aiming to achieve.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		For example, Policy PLP46 seeks to deliver 'A healthy and happy city' and 'A green city.' All policies within the PLP achieve one or more of the objectives. Clear and concise writing has been used throughout to ensure the policies can be easily used and understood for decision making. Several workshops were also held with the Council's Development Management Team, which contributed towards the drafting of the policies with the emerging Local Plan. Supporting text is also included to provide the rationale for the policy and/or certain criteria. The 2024 PLP and 2025 PLP Addendum were also reviewed several times by planning policy officers to check for any spelling or grammar errors. This exercise strengthened the clarity and legibility of policies (where relevant). Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map? Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: i. Thirteen sites (PLP3-PLP15) have been allocated in the emerging Local Plan, and they are covered in Chapters 4 and 5. Figures 4.1 and 5.1 clearly show the location and red line boundaries of the strategic sites and site allocations across the City. Furthermore, detailed, zoomed-in maps of each site are included under the corresponding policy. Each relevant policy is also accompanied by an 'Introduction' section, which includes detail about the context and/or history of the site. Through the 2025 PLP Addendum, maps associated with certain strategic sites were amended as follows: Figure 4.2 (Map of Tipner West) and Figure 4.8 (Map of Horsea Island Strategic Open Space) now include an area of land that is safeguarded for the landfall of a bridge that will link Horsea Island and Tipner West. Whereas in the 2024 PLP, the proposed bridge was marked on both figures. This change is in response to the Council's decision to produce a new policy for Tipner that does not harm international nature conservation designations in any way that cannot be mitigated.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		- Figure 4.6 (Map of Fratton Park & the Pompey Centre) now highlights the land that is safeguarded for new homes. The off-road route that links Fratton Park to Fratton Station has also been slightly amended to reflect this safeguarding of land. ii. All sites are clearly defined on the Policies Map, which is referenced under the first criterion of each corresponding policy to form the basis for any decision making relating to that site. All maps and/or graphics within the PLP are legible and it is clear if and how they are to be used in decision making (where applicable). In addition to the strategic sites and site allocations, other maps/figures included in the PLP are as follows: Design - Figure 3.4 shows 'the ten characteristics of well-designed places,' which has been sourced from the National Design Guide and Model Design Code. Criterion 3 of Policy PLP1 notes that where a design code is required for large-scale major development proposals, it should address the National Design Guide and Model Design Code. This is reiterated in paragraphs 3.39 and 3.41. - Figure 3.5 depicts the preferred design process for development in Portsmouth, and its purpose is to help guide decision making. The process is explained in great detail under paragraphs 3.36 and 3.37. Proposals for major development will be expected to fully document the project's design process and engagement through a Design and Access Statement or similar (paragraph 3.37). Strategic Sites - Policy PLP9 (Horsea Island Strategic Open Space) includes a copy of the permitted landscape masterplan for the eastern part of Horsea Island, which is referred to under criterion 2d as per the 2025 PLP Addendum. Housing - A map showing the proposed residential zones has been included to support Policy PLP21 (Figure 6.1), which is referenced under paragraph 6.118 and the policy itself. The proposed residential zones are also shown on the Policies Map. - A map showing the proposed estate renewal areas has been included to support Policy PLP23 (Figure 6.2), which is referenced under paragraph 6.135 and the policy itself. The proposed estate renewal areas are also shown on the Policies Map.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		Thriving Economy - A graphic showing the Portsmouth Town Hierarchy (figure 7.2) has been included to provide context for relevant criteria under policies PLP28, PLP29 and PLP30. Figure 7.2 is also explained in table 7.3 and paragraph 7.48. Upon initial review, Figure 7.2 had not been explicitly mentioned in PLP29; the supporting text was amended accordingly to reference the figure (paragraph 7.66). Climate Emergency - A map showing the current and future flood zones in Portsmouth (if defences were not built) has been included to provide context for the City's vulnerability to flooding (figure 8.1). Explanatory text is included in paragraph 8.5. The figure will not be used in decision making due to the fact that flood zones are subject to change. As noted in paragraph 8.5, '<i>reference should be made to the EA's website for the latest flood zone maps.</i>' - Figure 8.2 is an illustrative graphic and relates to Policy PLP31, showing the flood risk management steps outlined in Government Guidance. Upon initial review, the purpose of the figure was not clear. The supporting text was amended (paragraph 8.12) to provide clarification. - A graphic (figure 8.5) showing the energy hierarchy has been included to accompany Policy PLP33. The figure serves an illustrative purpose to help provide context for criterion 3 of PLP33. The figure is also explained in the supporting text (paragraph 8.59). - A map (figure 8.6) showing the proposed Coastal Zone for Portsmouth has been included to accompany Policy PLP36. The proposed Coastal Zone is also shown on the Policies Map. Explanatory text for the map can be found in paragraph 8.90. Greening the City - A map (figure 9.1) has been included depicting Portsmouth's 'Green Grid,' including Local Green Spaces and Green Corridors. The Green Grid forms part of the basis for Policy PLP38 to guide decision making in regard to the potential provision and/or loss of green infrastructure within the City. The Green Grid is also included in the Policies Map. Figure 9.1 also includes the proposed designated Local Green Spaces. Although, upon initial review, the figure had not been explicitly referenced under Policy PLP46: Local Green Spaces. Criterion 1 of Policy PLP46 was amended accordingly to reference Figure 9.1. - Figure 9.2 shows the designated nature conservation sites within Portsmouth and relates to Policy PLP39: Biodiversity. It is also used to supported other policies where applicable, including PLP3,

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		PLP6, PLP8, PLP10, PLP12, PLP13 and PLP15. The figure assists with decision making in regards to the potential effects development proposals may have on such sites within the City, depending on their location. The designated nature conservation sites are also shown on the Policies Map. Historic Environment Figure 11.1 originally showed the process that should be followed for any development proposals within the City for 'enabling development'. Upon initial review the figure had not been referenced within the relevant policy (PLP53) nor its supporting text. As it was not clear if or how the figure was to be used in decision making, it was removed from the 2024 PLP. Other figures include: - Figure 2.1 'Local Plan Objectives.' Six strategic objectives have also been developed from the vision for the emerging Local Plan, which are illustrated in this figure through different icons. Each policy within the emerging Local Plan achieves one or more of the objectives. - Figure 3.1 (as per the 2025 PLP Addendum) 'Key Diagram.' This figure shows the island geography of Portsmouth and the drivers behind the development strategy and individual policies of the emerging Plan. For example, the indicative location of strategic sites, open spaces, flood defences and key infrastructure such as the railway line and motorways. All other figures within the emerging Local Plan serve more of an illustrative purpose, rather than to guide decision making. For example, figure 10.1 is an example of solar canopy project at Portsmouth International Port. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: Changes were made to the following policies and/or supporting text in the 2024 PLP to clarify the use of graphics/maps: - Reference to Figure 7.2 has now been included in the supporting text for Policy PLP29 (paragraph 7.66). - Reference to Figure 9.1 has now been included in Policy PLP46.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		- The purpose of Figure 11.1 was deemed unclear and thus, it was removed from the PLP. Moreover, it depicts the process of 'Enabling Development,' and this type of development was not explicitly reference under Policy PLP53. - Additional text has been added to the supporting text for Policy PLP31 to clarify how figure 8.2 relates to the policy. These changes meant that the score for this question moved to right on the scale, reaching 2+. Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	Reason for score: i. Where relevant, each policy makes clear the use/type of development it will promote. For example, the type of development allocated under the strategic sites and allocations (PLP3-PLP15) is noted in the first criterion to set the context for the corresponding policy. The policies also state '<i>development proposals for the above named use will be permitted provided that they meet all of the following site specific development requirements...</i>' This is standard wording that has been included in policies PLP3-PLP15 to reiterate the type of development allocated at the site as well as the associated requirements. ii. Every endeavour has been made to use positive rather than negative wording. Terms such as 'supported' and 'encouraged' have been used throughout the PLP. Upon review, the only negative wording that has been used relates to the 'refusal' of development proposals and/or 'will <u>only</u> be permitted.' These policies are set out below Policies which include the word 'refuse/refused:' - PLP1: Design, criterion 5. - PLP12: St John's College, criterion 2f. - PLP13: Fraser Range, criterion I. - PLP26: Safeguarding Employment Land, criterion 4. - PLP39: Biodiversity, criteria 2 a.ii, b. ii, c, d.ii.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		- PLP41: Trees & Hedgerows, criterion 2 - PLP45: Open Space, criterion 2. - PLP54: Listed Buildings, criterion 2. For instance, criteria 2a. ii of PLP39 notes the following: <i>'Development proposals that will result in any adverse effect on the integrity of any international site <u>will be refused</u> unless it can be demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured.'</i> The purpose of this policy is to ensure that there is no significant harm to biodiversity. The use of negative wording here actually serves a positive purpose and contributes to achieving sustainable development within the City. Policies which include the wording 'will only be permitted/granted:' - PLP20: Houses in Multiple Occupation, criteria 1 and 2 - PLP26: Safeguarding Employment Land, criterion 2 - PLP28: Town Centres, criterion 7 - PLP29: Small Local Shops, criterion 2 - PLP30: Cultural and Visitor Economy, criterion 6 - PLP35: Air Quality and Pollution, criterion 1 - PLP37: Contaminated Land, criterion 1 - PLP38: Green Infrastructure, criteria 3 and 6 - PLP53: Historic Environment, criterion 1 - PLP54: Listed Buildings, criterion 1 - PLP55: Conservation Areas, criterion 3 - PLP56: Archaeology, criterion 3 For instance, criterion 1 of PLP37 states that: <i>" Planning permission will <u>only be granted</u> for development on or near contaminated land or where the presence of contamination is reasonably suspected where appropriate and sufficient measures can be taken to remediate and/or satisfactorily mitigate the risk of contamination. Such measures must address the</i>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<i>long-term safety of the proposed development, the end users of that development and the natural environment and include the future management of the site.</i> The purpose of this policy is to prevent unacceptable risks from contamination in Portsmouth. Therefore, the use of negative wording in this instance is justified. Criterion 2 of Policy PLP7: Fratton Park & the Pompey Centre includes the wording 'will not be permitted.' The purpose of this policy criterion is to prevent any development proposals coming forward that would prevent the delivery of housing. This is particularly important given the City's unmet housing need. Therefore, the use of negative wording in this instance is justified. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: Amendments were made to several policies in the 2024 PLP to use more positive wording: - Criteria 2f of PLP12 (St John's College) was changed from '<i>development proposals that gate off the whole site and prevent public access will be refused</i>' to '<i>development proposals will be permitted that provide public access to and through the site at all times</i>'. - Criteria 2m of PLP13 (Fraser Range) was changed from '<i>development proposals that gate off the whole site and prevent public access will be refused</i>' to '<i>development proposals will be permitted that provide public access to and through the site at all times</i>'. - .The word 'only' has been removed from criterion 1 of Policy PLP53. These changes meant that the score for this question moved to the right on the scale, reaching 2+. Reviewer Comments:				
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]	Reason for score: i-iii. Policies within the emerging Plan clearly note if requirements/criteria relate to certain scale/use of development. For example, the policies below specifically note where certain criteria apply to 'major development': - Criteria 3 of Policy PLP1: Design - Criteria 2 of Policy PLP2: Climate Emergency - Criteria 2j and k of Policy PLP6: Portsmouth City Centre - Criteria 1 of Policy PLP17: Affordable Homes - Criteria 3 of Policy PLP35: Air Quality and Pollution - Criteria 1 of Policy PLP38: Green Infrastructure - Criteria 1c.i of Policy PLP41: Trees & Hedgerows - Criteria 2 of Policy PLP49: Public Realm Furthermore, for the strategic sites and allocations (Policies PLP3-PLP15), the use/type of development to be allocated is noted in the first criterion of the corresponding policy. The relevant policies also make it clear that development requirements listed are only applicable to the strategic site or allocation in question. The inclusion of maps also provides detail on the location of development proposed. The following standard text has been used to introduce such requirements for policies PLP3-PLP15: <i>'Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements...'</i> There are some instances where the terms 'all development/all proposals' are used in the emerging Plan. Please see list of policies below: - Criterion 7 of Policy PLP3: Tipner West - Criterion 2b of Policy PLP11: Port Solent - Criterion 2p of Policy PLP4: Tipner East - Criterion g of Policy PLP13: Fraser Range - Criterion 3 of Policy PLP33: Sustainable Construction and Onsite Renewable Energy - Criteria 9 and 10 of Policy PLP47: Movement and Transport

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		These have been reviewed, and minor amendments have been suggested where necessary. Please see below. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: Criteria 9 and 10 under Policy PLP47 to be reviewed. The draft criteria previously stated '<i>all proposals should allow for efficient, safe and sustainable delivery of goods and access by service and emergency vehicles</i>' and '<i>all proposals must maintain or enhance all transport interchanges and sustainable transport facilities where relevant.</i>' The use of 'all proposals' here insinuated that even minor applications need to take this into consideration. In response to this, additional wording was added to the supporting text (paragraph 10.18) to clarify that it relates to all development '<i>which impacts vehicular movement.</i>' These changes meant that the score for this question moved to the right on the scale, reaching 2+. Reviewer Comments:
I	State how many policies are in your local plan update? Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.	There are 56 policies proposed in the emerging Plan: two core policies, thirteen strategic site/site allocation policies, twenty-seven development management policies, thirteen strategic policies and one area allocation policy. It is worth noting that the 2025 PLP Addendum covers eight policies: six strategic site/site allocation policies and two strategic policies. The policies in the 2025 PLP Addendum replace the draft policies in the 2024 PLP in their entirety, along with their introductions and supporting text from the 2024 PLP. Every endeavour has been made to ensure that policies within the emerging Local Plan do not cross-reference or repeat parts of other policies. This was taken into consideration at the early stages of the plan making process. Upon review, it was noted that the following policies repeated certain criteria: Criterion 2f of Policy PLP12 (St John's College) and Criterion 2m of Policy PLP13 both include the following wording: '<i>development proposals that gate off the whole site and prevent public access will be refused</i>'. This use is very limited and is considered appropriate. Wording in regards to the land safeguarded for landfall of a new bridge has also been repeated for Policies PLP3 and PLP9:

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Criterion 2 of Policy PLP3 (Tipner West) and Policy PLP9 (Horsea Island Strategic Open Space) both include the following wording: land is safeguarded for landfall of a new bridge, as shown on the Policies Map and figure 4.2 (4.8 for policy PLP9), connecting Tipner West to Horsea Island for the use of sustainable transport modes only. Given the bridge falls within both strategic site allocations, it is necessary for the criterion to be repeated in both policies. The only other repetition within policies is in regards to the requirements of the Conservation of Habitats and Species Regulations 2017, please refer to question 49 below for further detail.				
48.	Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies? If you find duplication or repetition you may want to take minute to consider whether this is appropriate.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As noted above, the only other repetition within policies is in regard to the requirements of the Conservation of Habitats and Species Regulations 2017, please refer to question 49 below for further detail.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, the only reference to regulatory requirements is as follows:				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<i>'To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsar designated sites...'</i> This criterion is included four times within the PLP. However, it was in response to the HRA and was deemed necessary to include under the relevant policies. They were as follows: - PLP5: Lakeside North Harbour - PLP9: Horsea Island Strategic Open Space - PLP11: Port Solent - PLP13: Fraser Range This reference to regulatory requirements is deemed appropriate as it is in response to the findings from the 2024 HRA. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as "to the Council's satisfaction", "considered necessary by the Council" or "appropriate" without associated clarification.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The following policies reference <i>'to the satisfaction of the local planning authority....'</i> - PLP5: Lakeside North Harbour - criterion 4d. This is in response to the HRA, and it is deemed appropriate to include wording. - PLP5: Lakeside North Harbour - criterion 4k. It is appropriate to include this wording as it requires a certain level of evidence to be submitted to the local planning authority. Without this wording, there would be no clear direction as to what type/level of evidence would be required/satisfactory for decision-making. This also applies to PLP10: Land West of Portsdown Technology Park - criterion 2b.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		The following policies reference '<i>where appropriate</i>...': - PLP1: Design - criterion f.i. The use of '<i>where appropriate</i>' relates to the provision of public art in public spaces. This wording is justified as the provision of public art is not always of relevance/required under a development proposal. - PLP37: Contaminated Land - criterion 1. The use of '<i>where appropriate</i>' relates to where contamination is known, or is suspected, and/or a sensitive land use.' It provides clarification and thus, it is deemed relevant in the context of the policy. - PLP53: Historic Environment - criteria 2, 4 and 6. The use of '<i>where appropriate</i>' is in line with the NPPF and PPG and thus, deemed appropriate in this context. One policy references '<i>considered necessary</i>...': - PLP3: Tipner West - criterion 7. The use of '<i>where considered necessary</i>' was in response to negotiations with PCC as the landowner and promoter of the site. - Where relevant, wording is provided in the policy's supporting text to provide context for the types of phrasing noted above. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: Criterion 2o under Policy PLP11 has been amended as follows: 'Take into account and where appropriate <u>Protect viewpoints and the wider visual impact across Portsmouth Harbour, including the impact on Porchester Castle.</u>' Reviewer Comments:

Date of assessment:	
Assessed by:	
Checked by:	
Overall Score:	
Comments:	