

CONSTRAINTS TOPIC PAPER

**To support the Portsmouth Pre-Submission Local Plan
2024 and**

**the Portsmouth Pre-Submission Local Plan Addendum
2025 combined**

February 2026



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Portsmouth Local Plan Constraints Paper

1. Introduction

- 1.1 The purpose of this paper is to summarise the constraints that impact the ability to deliver development in the City of Portsmouth and thus make it impossible to meet development needs. The paper references the evidence and justification for the positions taken for the Portsmouth Local Plan's housing, employment and open space targets contained in strategic policies: PLP16: Housing Target, PLP25: Employment Target and PLP45: Open Space. The paper sets out the constraints that have shaped the decisions made in trying to ensure a no stone unturned approach to meeting development needs in the City. The paper highlights the ambitious but balanced rationale for the choices made in the Local Plan and references the documents that helped to inform the choices made, which is reflected in the Local Plan's development strategy. The development strategy for Portsmouth from 2025 to 2040 set out in chapter 3 of both the 2024 Pre-Submission Local Plan and the 2025 Addendum '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.' The paper also provides evidence and context for the strategic sites and site allocations as set out in chapters 4 and 5 of the Local Plan.
- 1.2 This paper should be read alongside detailed background papers and evidence-based documents, which go into greater detail on specific topics and areas of detail. This paper aims to present an overview and story of the choices made in the Local Plan and to signpost detailed supporting evidence.

2. Identified Needs

- 2.1 A paper showing the constraints impacting the City would not be a necessity if the City was able to fully meet all of its identified development needs within the Local Plan. This section of the paper briefly outlines these needs to provide further context, and highlights where further detail in respect of requirements can be found. The City Council's evidence base documents explain the rationale for the locally derived requirements. Specifically in the Housing and Economic Development Needs Assessment (HEDNA)¹, HEDNA Update², the Housing and Economic Land Availability Assessment³ (HELAA), the Open Space Needs and Opportunities Assessment⁴ and the Open Spaces Assessment Addendum⁵.

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

² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-HEDNA-Update-Final-Report-October-clean.pdf>

³ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/HELAA-2025.pdf>

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-open-spaces-assessment.pdf>

⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Addendum-to-2018-Open-Spaces-Study-2021_compressed.pdf

Housing

2.2 In 2018, the Government amended the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) to introduce a "standard method" for calculating housing need. For Portsmouth, the most up to date standard method figure is 1,019 dwellings per annum which equates to 15,285 dwellings over the Plan period of 2025-2040. However, assessment indicated that Portsmouth would be unable to accommodate its full standard method housing figure necessitating an alternative 'capacity based' approach as set out in the Housing Background Paper⁶.

2.3 The Pre-Submission Local Plan Addendum (Policy PLP16) sets out a capacity based housing target for Portsmouth of 11,369 new homes from 2025 to 2040 with a net annual provision of approximately 758 new homes per year. This figure is based on the level of housing that can be realistically achieved within the Plan period having regard to Portsmouth's constraints, land availability and development capacity. The Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply; this is demonstrated through the Council's HELAA with appendix 6 of the HELAA going into a significant amount of detail on the sites identified and broad locations assessed. The sites from the HELAA that have been identified as 'deliverable' and 'developable' are either proposed for allocation in Chapters 4 or 5 of the Local Plan or are identified in Appendix 2 of the Plan as small or medium sites with the potential to deliver five or more dwellings. More information on the Council's housing target and how it was derived can be found in the Housing Background Paper⁷.

Employment

2.4 The Council's employment target set out in the Economic Development and Regeneration Strategy⁸ for 7,000 jobs between 2017 and 2036 informed the employment floorspace target in policy PLP25 of the Pre-Submission Local Plan Addendum of 138,746 m² of new employment floorspace. Oxford Economics forecasts were used as a baseline for the HEDNA and its Update. The 2025 HEDNA⁹ Included updated jobs and labour supply scenarios based on stakeholder engagement, historic trends and Portsmouth's role within the Solent Growth and Prosperity Strategy. The 2025 HEDNA Update concluded that overall, the City should realistically be planning for 4,800 to 7,900 jobs by 2040. This translates into an overall employment floorspace need figure in the City of around 107,485m² up to 2040.

2.5 The Local Plan Policy PLP 25 makes provision for a total of 138,746m² of employment floorspace (table 7.1). Of this floorspace 75,000m² is located on two Strategic sites at Tipner West and at Lakeside, both of which are being promoted by the City Council. This emphasises the role of the City Council as a driver enabling economic growth in the City. The City Council provision of 138,746m² represents an oversupply of 31,261m²

⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Housing-Background-Paper-2025.pdf>

⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Housing-Background-Paper-2025.pdf>

⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/01/Economic-Development-Regeneration-Strategy-Accessible.pdf>

⁹ [Portsmouth-HEDNA-Update-Final-Report-October-clean.pdf](#)

compared to its need of 107,485m². This oversupply has been offered¹⁰ to Havant Borough Council through the Duty to Cooperate, who have accepted this offer.

Open Space

2.6 The constrained nature of the City means that there are expected shortfalls in some types of open space. The Open Spaces Study Addendum¹¹ identifies that the City had a deficit of 37.20 ha of public open space with the deficit expected to grow as the City's population increases. The Council also has deficits in sports pitch provision as identified in the Playing Pitch Strategy¹². This includes three full size 3G football pitches, five youth Football pitches and 13 adult football pitches. The Study also identifies the need for improvements to the quality of offer for hockey, cricket and rugby. The Council has been working to rectify these deficits and has recently succeeded in providing new facilities at Moneyfields¹³ and King Georges Playing fields¹⁴. The City Council is looking to address the identified deficits through Policy PLP45 of the Pre-Submission Local Plan (2024). This policy requires that proposals for 50 or more homes provide open space at a ratio of 1.65 ha per 1,000 people.

¹⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/PCC-letter-to-HBC-21-08-25.pdf>

¹¹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Addendum-to-2018-Open-Spaces-Study-2021_compressed.pdf

¹² https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Final_playing_pitches_strategy_2018.pdf

¹³ <https://publicaccess.portsmouth.gov.uk/online-applications/applicationDetails.do?keyVal=P2G1QXMOKDW00&activeTab=summary>

¹⁴ <https://www.portsmouth.gov.uk/services/leisure/sports-and-activities/improving-our-sports-facilities/king-george-v-football-complex/>

3. History and Geography of Portsmouth

3.1 This section of the paper considers the geography of the City, how it has influenced historic growth and how it will continue to impact future growth.

3.2 The City of Portsmouth is located on the south coast of England approximately 60 miles southwest of London. The majority of the City is located on Portsea Island which is separated from the mainland by Ports Creek. The Portsmouth City Council (PCC) local authority area includes the areas of Paulsgrove, Cosham, and Drayton on the mainland. The local authority area also includes half of Langstone Harbour and the majority of Portsmouth Harbour. The areas below the high tide mark are under the jurisdiction of the Marine Maritime Organisation and require a marine licence for works.

3.3 Portsmouth is bordered by Portsmouth Harbour to the west, Langstone Harbour to the east and the Solent to the south. Portsmouth has four neighbouring local authorities: Fareham, Gosport, Havant and Winchester (see figure 1) which have largely developed in parallel to the City and which have a close interrelationship with the City forming part of a contiguous built up area, of which the City of Portsmouth is the primary settlement. The City Council has a close working relationship with local neighbouring authorities, as exemplified by the agreements with Fareham and Winchester Councils to accommodate some of the City's unmet housing need within their areas as detailed in the City Council's Duty to Cooperate Statement¹⁵ and Statements of Common Ground with those LPAs (Fareham¹⁶ / Winchester¹⁷). The City Council is working closely with its immediate neighbours in South East Hampshire (Gosport, Havant and Fareham) who share a housing market area and functional economic market area. This work is set out in detail in the Duty to Cooperate Statement and correspondence in the Duty to Cooperate section of the Core Document Library¹⁸; a Statement of Common Ground is being prepared by the four local authorities making up South East Hampshire.

¹⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Duty-to-Cooperate-Statement-November-2025.pdf>

¹⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/June-24-Statement-of-Common-Ground-FBC-PCC-v1-Signed-FINAL.pdf>

¹⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Statement-of-Common-Ground-between-Portsmouth-and-Winchester-PCC-updated-October-2024-FINAL.pdf>

¹⁸ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/duty-to-cooperate/>

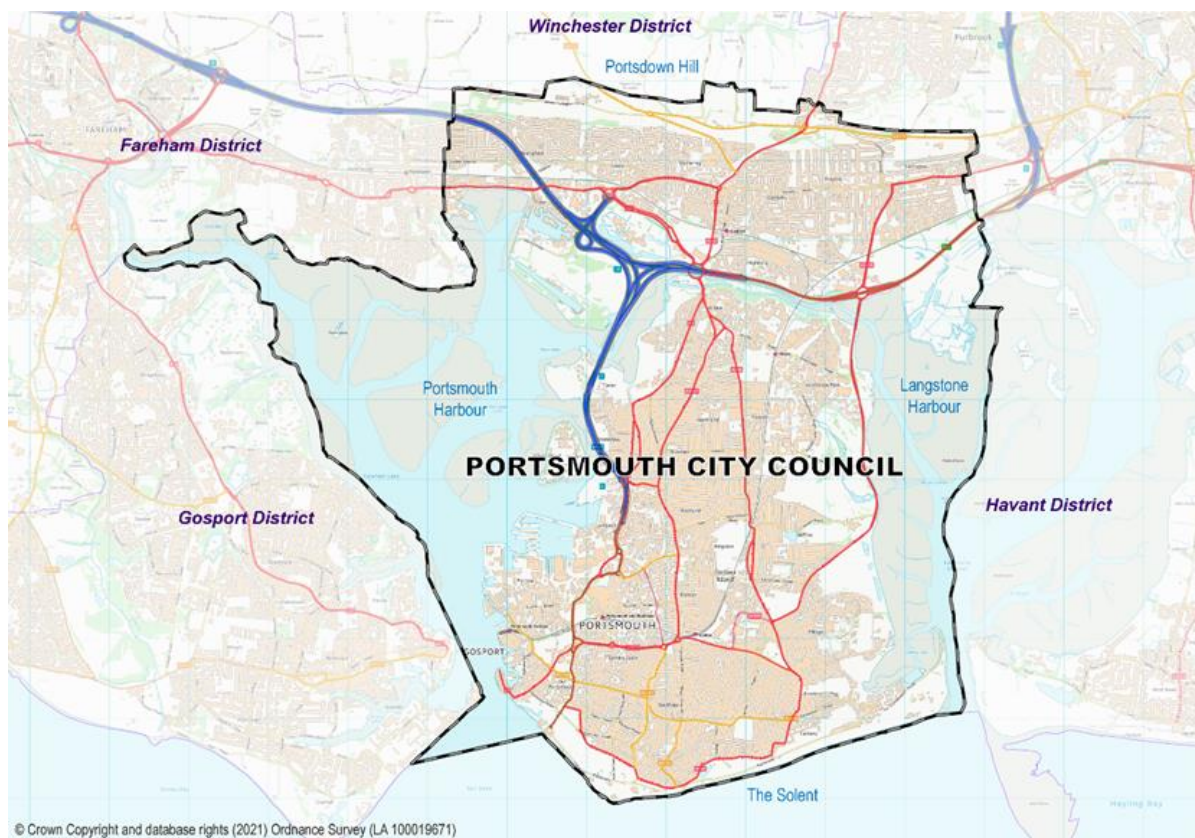


Figure 1: Map of the Portsmouth Unitary Authority area

3.4 Portsmouth has long been associated with the Royal Navy, with the City historically developing on the south western corner of Portsea Island. The City grew steadily in the twentieth century spreading off Portsea Island and onto the mainland (see figures 2 and 3). In addition to growth on Portsea Island, the City spread across Ports Creek, joining the settlements of Cosham and Wymering to the City. By the mid to late twentieth Century the entirety of what was to become the Portsmouth Unitary Authority area was fully developed (figure 3), with the last significant green field development in the City occurring in approximately the 1960s.



Figure 2: Portsmouth circa 1900



Figure 3: Portsmouth circa 1950s

Growth in a Limited Area

3.5 In the late twentieth century Portsmouth continued to grow despite having reached the natural limits of Portsea Island before reaching the boundaries of the neighbouring authorities on the mainland. The growth of the City in the late twentieth century was largely accommodated in three main ways, namely through:

- land reclamation
- densification
- redevelopment of brownfield land.

3.6 The City was subject to significant land reclamation in the late twentieth century in both Portsmouth and Langstone Harbours, most notably the former landfill at Horsea Island and the creation of the Port Solent (a marina, commercial and residential neighbourhood) joining Horsea Island to the mainland in the 1980s and the construction of the M275 motorway. Landfill was used to infill parts of Langstone Harbour in Milton and Eastney to create what are now the open spaces of Milton Common and Kingsley Road Open Space and part of Great Salterns.

3.7 In regard to densification, much of the post war redevelopment of areas of the City including Buckland and Somerstown introduced taller buildings and significant amounts

of higher density flatted development. This development pattern has continued into the twenty first century with the development of residential and mixed-use schemes at a high density including Gunwharf Quays, the Admiralty Quarter, student accommodation blocks around Portsmouth and Southsea Station and most recently at Kingston Prison.

3.8 The City has been redeveloping brownfield sites for predominantly residential purposes for much of the late twentieth century and into the early twenty first century. Notable examples include the former barracks at Blount Road (Old Portsmouth) and Liddiard Gardens (Eastney), the former railway sidings at Fratton Way, the Former Hospital at Union Road and Cotton Road, the former Airport at Anchorage Park and the examples already given at Gunwharf Quays, the Admiralty Quarter and Kingston Prison.

3.9 This cumulative historic development has resulted in the built form of the City as shown in figure 4 which shows that the vast majority of the City's land mass is already developed with the remaining open areas providing much valued public open space.

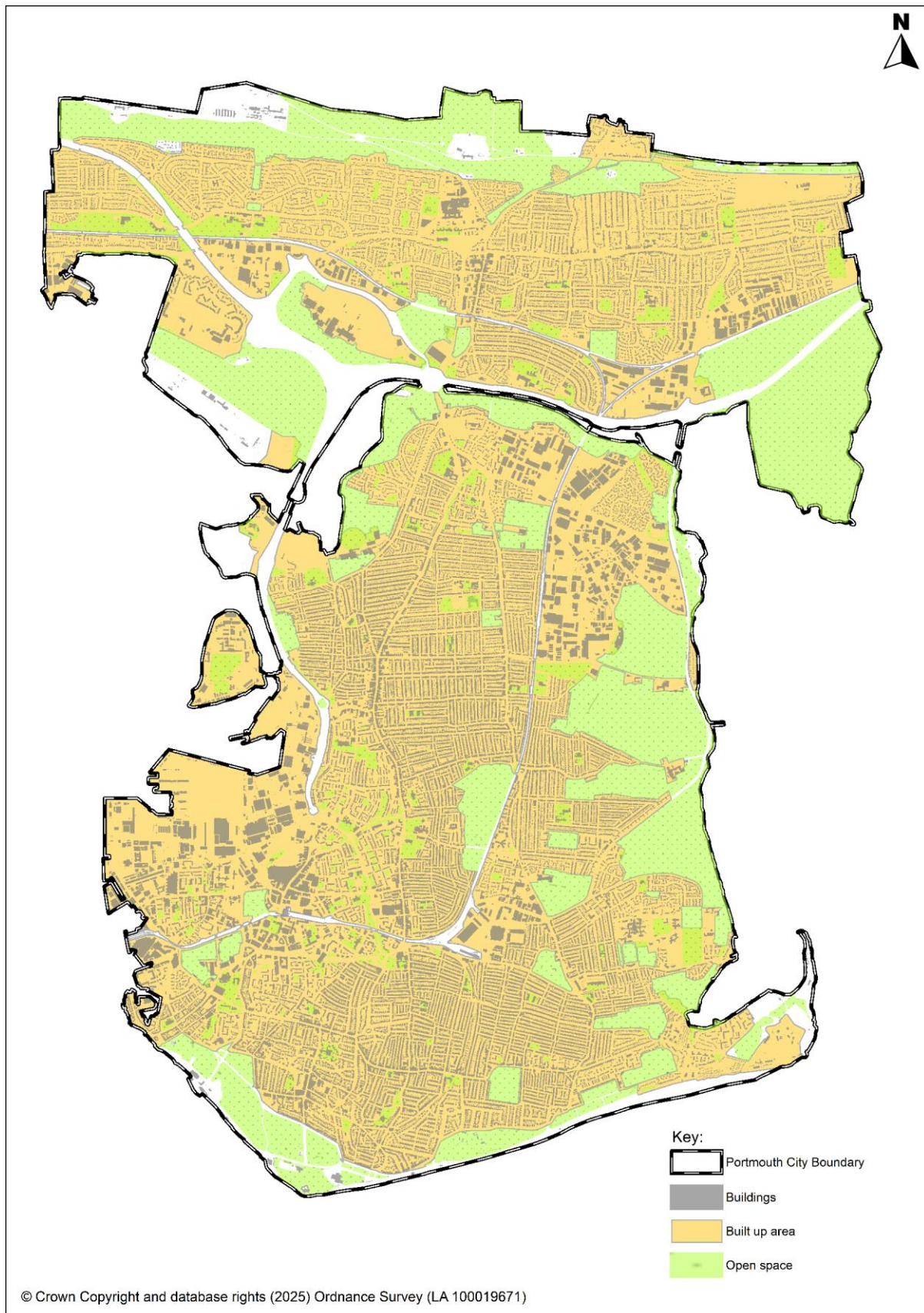


Figure 4: The built-up area of Portsmouth

Development Strategy

- 3.10 The Council's development strategy for Portsmouth set out in the emerging Local Plan is to maximise the potential of developable sites focused on the strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design. This will be largely accommodated by building on land that has already been reclaimed, densification and redevelopment of brownfield land.

Land Reclamation

- 3.11 Undertaking land reclamation of the kind done in the late twentieth century is no longer possible due to the increased protection of the natural environment. Most of Portsmouth and Langstone Harbours are protected by international nature conservation designations including Special Protection Area (SPA) and Ramsar (see section 4 of this paper). The impacts of climate change are also putting pressure on the coastal habitats that surround Portsmouth through coastal squeeze and warming. The City Council previously pursued a number of development options in order to provide a regionally significant marine employment hub at Tipner West. In early 2025 following a negative IROPI (imperative Reasons of Overriding Public Interest) Opinion from the Secretary of State for Housing, Communities and Local Government, the Council decided on a new approach and prepared a new Local Plan policy that did not have any adverse impacts on international nature conservation designations that cannot be mitigated. This new approach is set out in the policy for Tipner West (PLP3) in the Portsmouth Pre-Submission Local Plan Addendum (2025). More detail on the environmental constraints impacting Portsmouth are set out in section 4 of this report and in the Biodiversity¹⁹ and Green Infrastructure²⁰ Background Papers.
- 3.12 Several of the Local Plan Strategic Sites and Allocations are on land that has been previously reclaimed. These include Port Solent, Lakeside and the Horsea Island Strategic Open Space. The City Council is looking to make the best use of this reclaimed land by promoting further development on these sites including new housing, employment and open space.

Densification Opportunities

- 3.13 Densification is an approach that is being actively pursued in the City, most notably in respect of housing development. High density development is proposed at the majority of the strategic sites and site allocations in the Local Plan. These allocations generally involve the change of use from underused or vacant land and are addressed further in the following section of this paper on redevelopment of brownfield land. The most notable example of densification amongst the Local Plan allocations is the Somers Orchard Allocation as detailed in Policy PLP15 of the emerging Local Plan. The Somers Orchard site comprises the redevelopment and densification of an existing residential area following the demolition of two social housing blocks that were identified as having structural weaknesses. In total the Somers Orchard scheme (planning application references 23/01574/FUL and 23/01574/FUL) is creating a total of increase of 293

¹⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Biodiversity-Background-Paper-Updated-2021_compressed.pdf

²⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21_compressed.pdf

residential units with 566 dwellings being built to replace the 272 that were lost through the demolition of the social housing blocks.

- 3.14 The City Council recognises that a large part of the housing land supply in the City is made up of smaller non allocated sites and in order to increase the density of these sites coming forward has included an ambitious residential density policy in the Local Plan (Policy PLP21). The Policy proposes three minimum density zones for residential development in the City with the aim of uplifting density overall and increasing the supply of new dwellings; these are shown in Figure 5. The rationale for the density zones as set out in policy PLP21 is explained in detail in the Housing Background Paper²¹ In addition Policy PLP1: Design (point 7a) of the Local Plan identified a series of areas where tall buildings would be supported, thus encouraging higher density in these areas.



Figure 5: Policy PLP21 proposed residential densities

²¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Housing-Background-Paper-2025.pdf>

Redevelopment of Brownfield Land Opportunities

3.15 Due to the built-up nature of the City most of the development opportunities including all of the major development opportunities are on brownfield land. This is reflected in the strategic sites and site allocations identified to bring forward growth in the Local Plan. A list of the strategic sites and allocations and their most recent and proposed land uses are set out in table 1 below:

Strategic Site	Most recent land use (majority of the site)	Proposed land use
Tipner West	Scrapyard / MoD Firing Range / school	Employment / Residential
Tipner East	Scrap Yard/ Dog Track	Transport Hub / Residential
Lakeside North Harbour	Car parking/ Landscaped area	Employment
Portsmouth City Centre	Car Parking/ Commercial/Employment	Employment / Residential / commercial
Fratton Park and the Pompey Centre	Car Parking / Commercial/Employment	Commercial / Residential / Stadium
Land West of Portsdown Technology Park	Employment (now derelict)	Research and Development
Port Solent	Boat Storage / Car Parking	Residential
St John's College	Education	Residential
Fraser Range	MoD	Residential
The News Centre	Print works (now demolished)	Bus Depot and residential
Somers Orchard	Residential (now demolished)	Residential

Table 1: Strategic sites and allocations in the emerging Portsmouth Local Plan

3.16 As shown in table 1, all of the City's strategic sites and site allocations are mostly brownfield sites with a wide variety of former uses. The Council's Site Allocations Topic Paper²² provides further detail on the type and quantum of development being brought forward on the Local Plan strategic sites and site allocations.

²² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Allocations-Topic-Paper-RS-Nov-2025-PDF-FINAL-VERSION.pdf>

4. Constraints

4.1 This section of the topic paper looks into the specific constraints which limit the potential for development in the City of Portsmouth. These constraints take different forms including environmental, physical, legal and policy or a combination of these. The constraints have different weightings and are subject to change. The constraints overlap significantly, with some areas having many interrelated constraints that impact them. Some of the constraints are showstoppers whilst others impact the type, location and quantum of development that can be built.

4.2 This section takes each of the main constraints in turn and gives a brief summary of their impacts upon development opportunity in the City. The Paper signposts to further policy / evidence base documentation in the form of studies and topic papers which go into detail on the specific topic areas.

4.3 The constraints covered in this section are as follows:

- Nature conservation (international, national and local designations) including recreational disturbance and nutrient neutrality
- Local Green / Open space
- Flooding
- Heritage
- Air Quality
- Land Ownership

Nature Conservation Constraints

4.4 Figure 7 shows the nature conservation designations in the City.

International Designations

4.5 The PCC administrative area comprises the majority of Portsmouth Harbour and a large proportion of Langstone Harbour. Portsmouth Harbour is largely covered by a Special Protection Area (SPA²³) and has been listed due to the presence of the following qualifying species: Dark-bellied Brent Goose; Red-breasted Merganser; Dunlin and Black-tailed Godwit. Langstone Harbour forms part of the Chichester and Langstone Harbour SPA²⁴ which has been listed due to the presence of 18 different qualifying species of waterbird. The Solent and Dorset Coast SPA also covers Portsmouth Harbour and the Solent off Southsea seafront and has been listed for overwintering birds and breeding terns. In addition to the SPA protection, parts of Portsmouth Harbour and Langstone Harbour are also protected by Ramsar designations. The Solent is also covered by the Solent Maritime Special Conservation Area (SAC).

Functionally Linked Land

4.6 The Waders and Brent Geese that are the listed species for Portsmouth Harbour and Langstone Harbour SPAs require terrestrial habitat for feeding when the tide is in. This habitat is known as functionally linked land and is identified through the Solent Waders

²³ <https://publications.naturalengland.org.uk/publication/4857883850178560>

²⁴ <https://publications.naturalengland.org.uk/publication/5789102905491456>

and Brent Goose Network²⁵. The functionally liked land is divided into categories of varying importance as set out in the Solent Waders and Brent Goose Strategy Mitigation Guidance²⁶. The guidance also sets out the requirements for mitigation for plans and projects which impact sites in the network.

- 4.7 The non-designated supporting habitat is categorised into four classifications. These are: Core Areas, Primary Support Areas, Secondary Support Areas, Low Use Sites and Candidate Sites. The areas within Portsmouth are shown on figure 6. The mapping for the Solent Waders and Brent Geese is updated as and when new data is received.

Recreational Disturbance

- 4.8 The Dark-Bellied Brent Goose is a winter visitor to the Solent from its breeding grounds in Siberia. Virtually the entire world population winters in north-western Europe. In nature conservation terms the species is of high international importance and is regarded as vulnerable because of the relatively small size of the world population, which has a highly variable breeding success. The Geese overwinter in the Solent where they feed on the mudflats and supporting habitat. Disturbance can have a marked effect on Brent Geese. When mildly alarmed, they raise their heads but quickly resume feeding. When levels of disturbance increase, they fly away and resettle when the cause of disturbance has passed or look for another quieter site nearby. The effects of disturbance investigated as part of a wider Solent study, commissioned by the Solent Recreation Mitigation Partnership.
- 4.9 PCC along with the other Partnership for South Hampshire (PfSH) authorities has funded the creation of and inputted into the Solent Waders and Brent Goose Strategy. The Solent Waders and Brent Goose Strategy is a conservation partnership project, which aims to conserve the internationally important Brent Goose and wading bird populations within and around the SPA and Ramsar wetlands of the Solent coast.
- 4.10 The Bird Aware Partnership has employed a ranger team that engage with visitors and communities along the coast. The rangers raise awareness of the impacts people's activities can have on the Geese and Waders and encourage them to be considerate about the birds and change how they interact with them. This alongside some limited SANG schemes act as the mitigation for recreational disturbance in the Solent.

²⁵

<https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

²⁶ <https://solentwbgs.wordpress.com/wp-content/uploads/2025/04/swbgs-mitigation-guidance-2024.pdf>

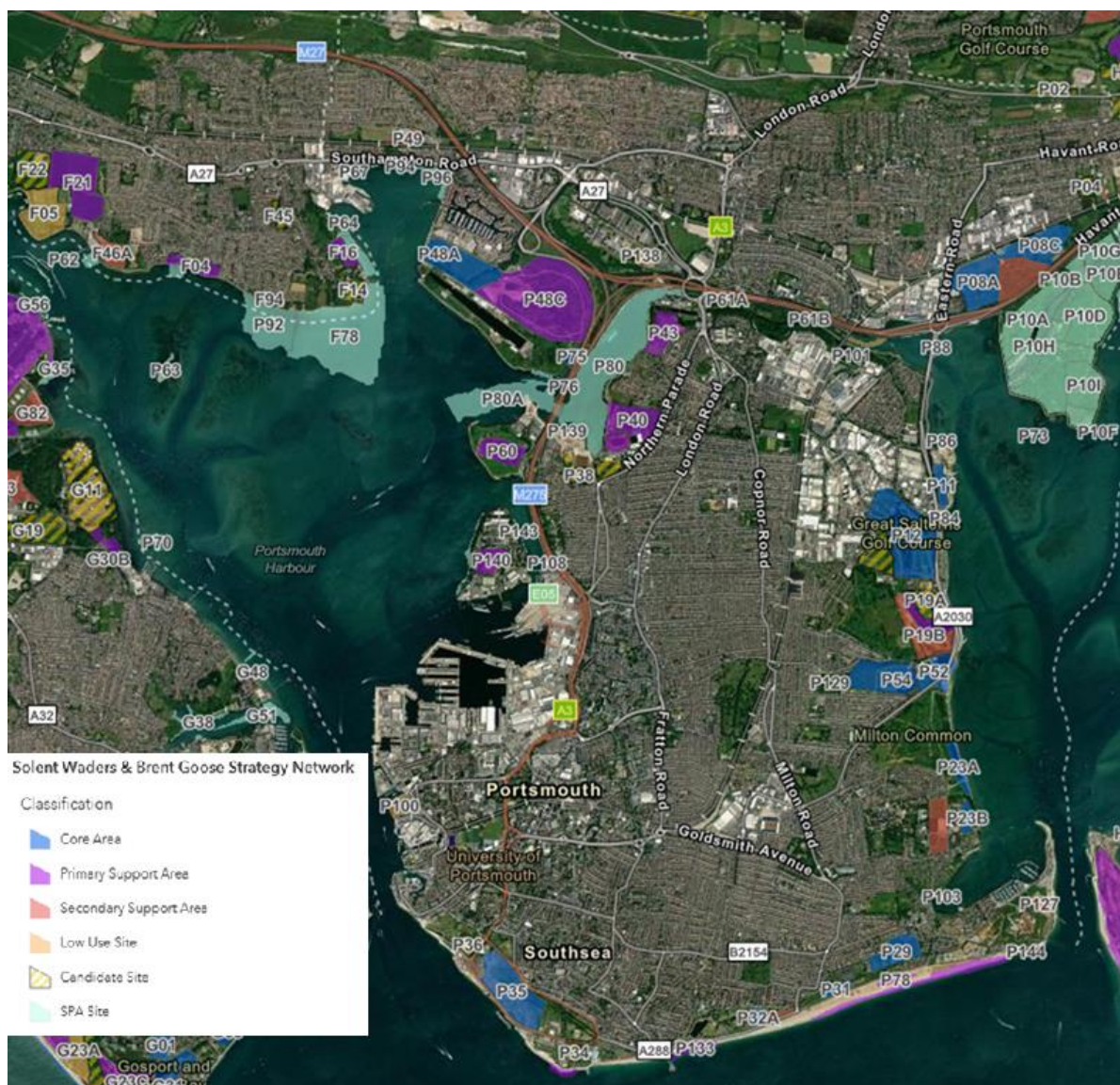


Figure 6: Functionally linked land in Portsmouth

Disturbance from Construction

4.11 Development schemes can result in the disturbance of Geese and Waders in habitats sites and functionally linked habitats through, noise and visual disturbance arising from construction activities, as well as from post-construction disturbance from site usage, road traffic and operational lighting.

Nutrient Neutrality

4.12 In 2018, Natural England advised that new development in the Solent region should only be granted planning permission if it can demonstrate nutrient neutrality. This followed a European Court of Justice ruling and a review that identified that existing nutrient levels were putting internationally designated sites in the Solent into unfavourable condition due to eutrophication.

4.13 In response PfSH formed a Water Quality Working Group to coordinate a PfSH-wide response to water resource issues including nutrient pollution in the Solent; this work has evolved through several iterations into the current Solent Mitigation Partnership (SMP).

The work streams of the SMP included facilitating the development of mitigation market and conducting supply and demand analyses to identify areas most in need of mitigation and work on the Local Nutrient Mitigation Fund. The work of the SMP means that new homes and overnight accommodation can be built without an adverse impact on the water quality of international nature conservation designations in the Solent.

- 4.14 The City Council has a Nutrient Neutrality Strategy²⁷ based upon the work undertaken in partnership with PFSH. This Strategy allows for applicants to purchase mitigation credits. These credits enable development to go ahead by providing mitigation either through water efficiency measures in PCC's housing stock or through contribution to the Hampshire and Isle of Wight Wildlife Trusts site at Nunwell on the Isle of Wight.

National Designations

Sites of Special Scientific Interest

- 4.15 Parts of Portsmouth Harbour and Langstone Harbour are designated as Sites of Special Scientific Interest (SSSI). Portsdown Hill is also a SSSI comprising a non-cultivated site on the south-facing escarpment of the Hill. The Portsdown Hill SSSI is protected for its rich chalk grassland flora which supports a diverse insect fauna, and an upright brome dominated grassland.

Local Designations

Sites of Importance for Nature Conservation

- 4.16 In addition to the nationally protected habitats Portsmouth has 37 Sites of Importance for Nature Conservation (SINCs) as shown in Figure 7. These SINCs are mainly on the periphery of the City and are often closely linked to the international designations. The constraints posed by the SINCs are set out in more detail in the Biodiversity Background Paper²⁸ (Map 3). There is significant overlap between these areas of SINC and the Supporting Habitat for Brent Geese and Waders as shown in the Solent Waders & Brent Goose Strategy Network²⁹. The Network identifies areas of supporting habitat and categorises them by their usage by the protected goose and wader species. The Solent Waders and Brent Goose Strategy³⁰ has recently been updated, with the revised strategy being adopted in April 2025.

²⁷ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/nitrate-mitigation-strategy/>

²⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Biodiversity-Background-Paper-Updated-2021_compressed.pdf

²⁹ <https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

³⁰ <https://solentwbgs.wordpress.com/wp-content/uploads/2025/04/solent-waders-brent-goose-strategy-2024.pdf>

Local Nature Reserve

- 4.17 The City has a single Local Nature Reserve (LNR) covering Farlington Marshes. This is a 119.7 hectare LNR, which is owned by PCC and managed by Hampshire and Isle of Wight Wildlife Trust. The Marsh is an important habitat for Geese and Waders and is also protected a part of the Langstone Harbour SPA.

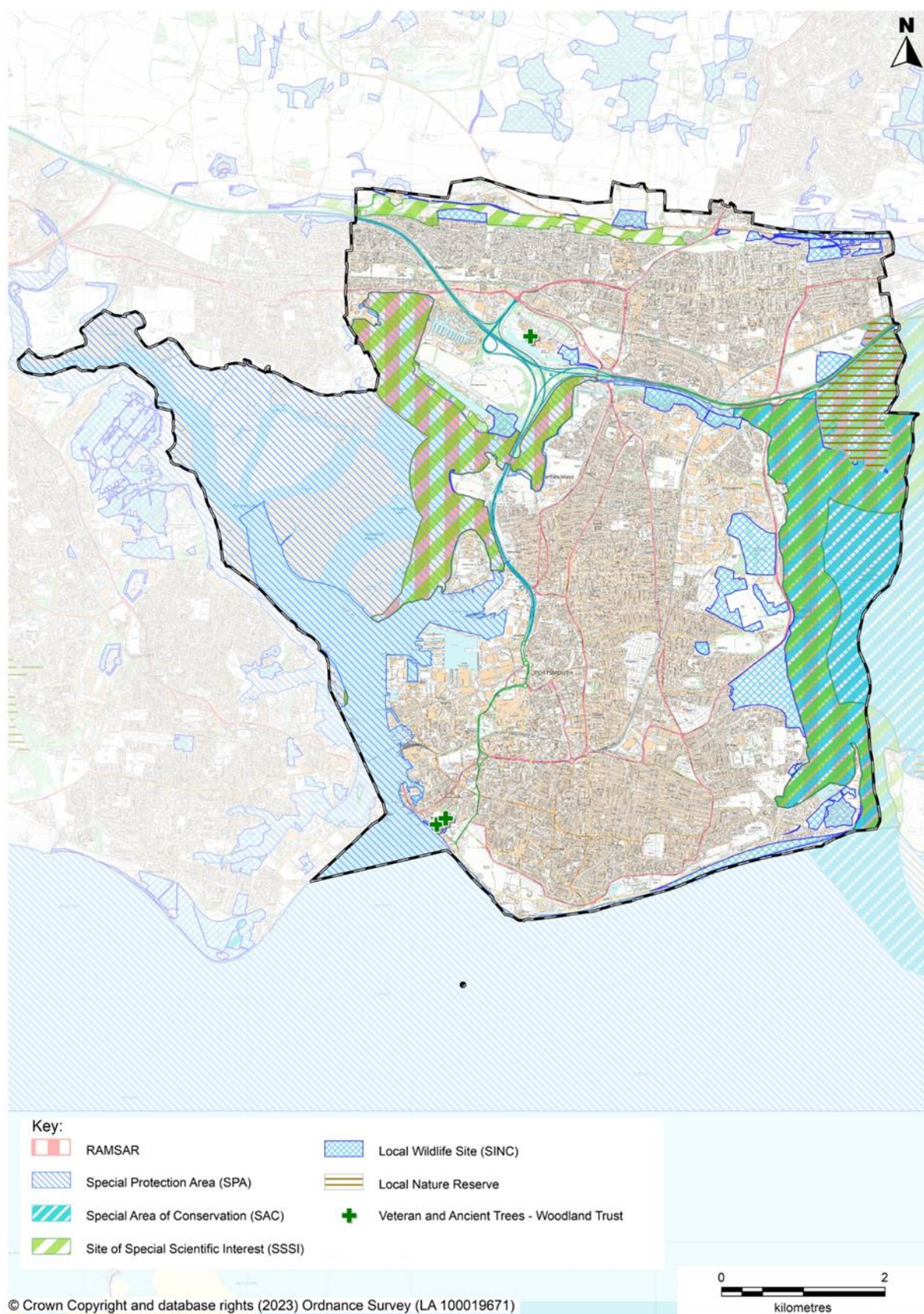


Figure7: Nature Conservation Designations in Portsmouth

Priority Habitats

4.18 A significant proportion of the City's area is covered by Priority Habitats. Much of this habit is marine in nature with the largest area of priority habitat by far being intertidal mudflat (overlapping in large part with the SPA / Ramsars). The largest terrestrial Priority Habitat is Calcareous Grassland of which there is 55ha in the City. The Biodiversity Background Paper sets out detail on the Distribution of Priority Habitats and species (maps 5, 6 and 7) and goes into detail on trends in the condition of the habitats. Table 2 of this Paper below summarises the extent of priority habitat in the City as of March 2024.

Priority Habitat	Comments on Status	Combined Hants area (ha)	% of Combined Hants area	PCC area (ha)	% of PCC area	2022/23 PCC area (ha)	Change in area (ha)
Grasslands							
Lowland Calcareous Grassland	Comprehensive.	2,235	0.58	57	0.95	55	2
Lowland Dry Acid Grassland	Comprehensive. Some overlap with Lowland Heath.	3,511	0.9	7	0.12	7	0
Lowland Meadows	Comprehensive. Some overlap with Coastal and Floodplain Grazing Marsh and with Wood-Pasture and Parkland.	1,432	0.37	21	0.35	25	-4
Lowland Mixed Deciduous Woodland	Ongoing as all semi-natural woodland has been included yet not all surveyed for qualifying NVC types. Also ongoing to remove small clumps.	35,669	9.18	7	0.12	7	0
Wet Woodland	Fairly complete. Areas will exist in LMDW that have not yet been surveyed for qualifying types.	2,250	0.58	1	0.02	1	0
Wood-Pasture and Parkland	Will be completed as part of Ancient Woodland Review 2022-24.	5,613	1.44	8	0.13	8	0

Priority Habitat	Comments on Status	Combined Hants area (ha)	% of Combined Hants area	PCC area (ha)	% of PCC area	2022/23 PCC area (ha)	Change in area (ha)
Arable, orchards and hedgerows							
Hedgerows	No comprehensive information for Priority hedgerows. All hedgerows mapped as linear features (km).	[16,448]	n/a	[66]	n/a	[66]	[0]
Wetlands							
Coastal and Floodplain Grazing Marsh	Work ongoing to verify all qualifying grazing marsh. Some overlap with Lowland Meadows and with Purple Moor Grass and Rush Pastures.	7,784	2	100	1.66	88	12
Reedbeds	Comprehensive.	246	0.06	19.9	0.33	20	0
Coastal							
Coastal saltmarsh	Comprehensive.	879	0.23	45	0.75	53	-8
Coastal Sand Dunes	Comprehensive.	46	0.01	0.3	0	0	0
Coastal Vegetated Shingle	Comprehensive.	201	0.05	20.8	0.35	21	0
Intertidal mudflats	Comprehensive.	4,062	1.05	949	15.78	1,138	-189
Saline lagoons	Comprehensive.	67	0.02	3.6	0.06	6	-2
Marine							
Seagrass beds	Comprehensive.	348	0.09	125.3	2.08	125	0
Total		81,876	21.08	1,365	22.69	1,554	-189

Table 2: Extent of Priority habitats in Portsmouth (as at 31st March 2024) showing only habitat types present in Portsmouth.

Biodiversity Opportunity Areas

4.19 The City contains three Biodiversity Opportunity Areas (BOAs) as shown on figure 8. These areas were identified by the Hampshire Biodiversity Information Centre³¹ and represent Core Areas of Biodiversity interest. As can be seen in Figures 7 and 8 there is a significant degree of overlap between the BOAs and the SPA / Ramsar and SSSI designations in the City reflecting the importance of the habitat of these areas. Section 3.6 of the Biodiversity Background Paper goes into further detail on the importance of the BOAs.

³¹ <https://www.hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre>



Figure 6: Biodiversity Opportunity Areas

Hampshire Local Ecological Network and the Local Nature Recovery Strategy

4.20 The Hampshire Local Ecological Network mapping aims to establish a network to:

- take a landscape-scale approach to nature conservation;
- embed the ecological network concept within strategic planning; and
- to shape development proposals

4.21 The Biodiversity Background Paper goes into detail on the network in the City (Background Paper map 9 and section 3.7). The concept that was proposed through the Local Ecological Network has been built on by Hampshire County Council (HCC) through their Local Nature Recovery Strategy (LNRS)³².

³² <https://www.hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy>

4.22 The LNRS identifies potential priority areas where interventions could be undertaken to improve biodiversity and habitats. The mapping is shown in figure 9. PCC as supporting authority approved the LNRS in 2025. The priority areas in the City are located mainly around the edges of Portsea Island in the more open and coastal areas and along Portsdown Hill. The largest areas of habitat in the City identified on the measures map in the LNRS are: SINCs requiring active management, Solent Wader and Brent Goose sites, and opportunity focus areas and additional sites on Portsdown Hill and at the Hilsea Lines. The priority areas identified through the LNRS are those where there is the most potential for nature recovery and enhancement in order to create a bigger, better and more joined up habitat network. The LNRS does not add an extra level of constraint or protection (many sites in the LNRS are protected by existing national and local designations), however the Council through Policy PLP39 of the emerging Local Plan is looking to join up and enhance its natural and open spaces and the priority habitats identified in the LNRS would be a key consideration in doing this.

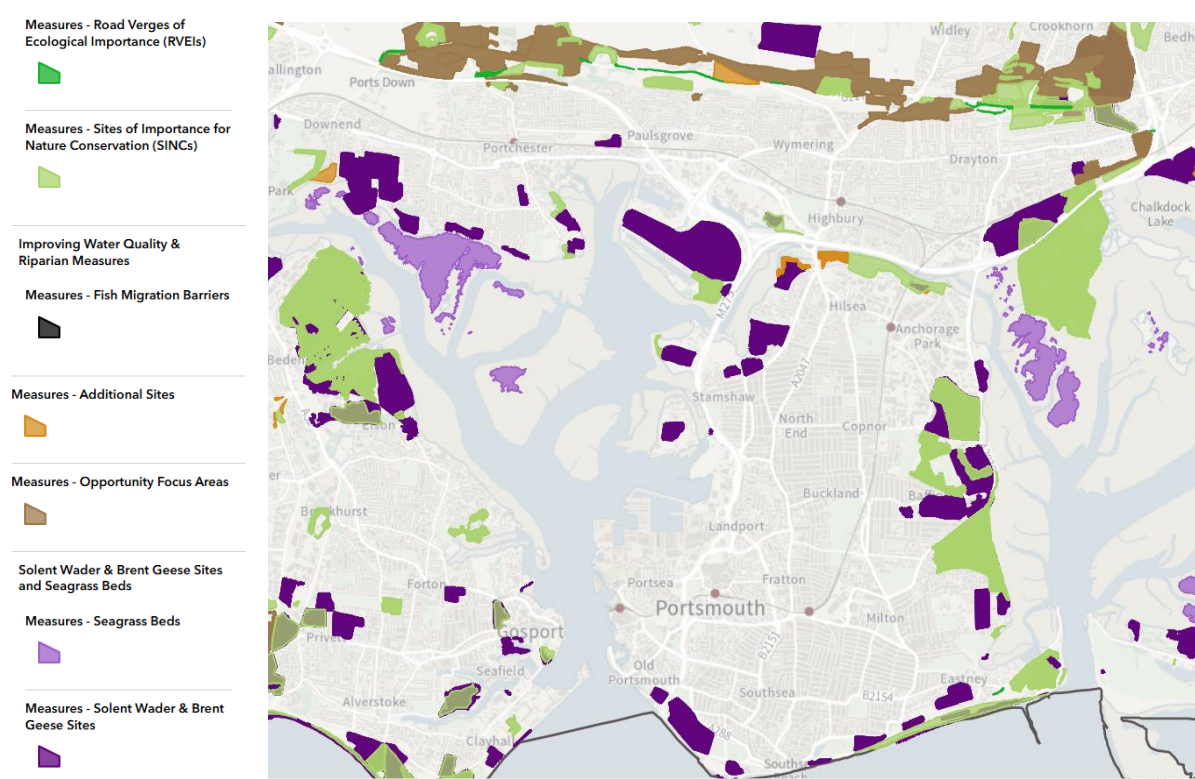


Figure 7: Measures Mapping from Hampshire LNRS

Open space

4.23 The City Council's Open Spaces Study Addendum³³ identified that the Council had deficits of open space provision across a range of types of open space including amenity greenspace, provision for children and young people, allotments, natural and semi natural greenspace, and public parks and gardens. This is recognised in policy PLP45 of the emerging Local Plan which prevents the loss of open space unless there are wider public benefits. This means that the City's open spaces are protected for that use and are not available for redevelopment further constraining development.

³³ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Addendum-to-2018-Open-Spaces-Study-2021_compressed.pdf

Local Green Spaces

- 4.24 The City Council is designating 22 Local Green Spaces (LGS) in Policy PLP46 of the emerging Portsmouth Local Plan. In addition, 10 LGS were designated through the Milton Neighbourhood Plan³⁴. When open space is designated as LGS it gets the same level of protection as green belt under national policy. This means that only very limited development is permitted on them.
- 4.25 The LGSs in the City have been designated because of their beauty, historic significance, recreational value, tranquillity and wildlife or a combination of these factors. The Local Green Spaces Background Paper (Appendix 1)³⁵ sets out a detailed rationale for why each of the LGSs has been designated. The appendix to the background paper also shows the long list of sites that were considered as potential LGS, but which were discounted as not meeting the requirements for being designation. The Milton Neighbourhood Plan (Policy ENV1) provides detail on the LGSs designated in the Milton area of the City. The extant and proposed LGS within the Portsmouth City boundary are shown on Figure 10 and are listed under policy PLP46: Local Green Spaces of the emerging Local Plan³⁶.

³⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/10/Milton-Plan-Final-adopted.pdf>

³⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Local-Green-Spaces-Background-Paper-PDF.pdf>

³⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

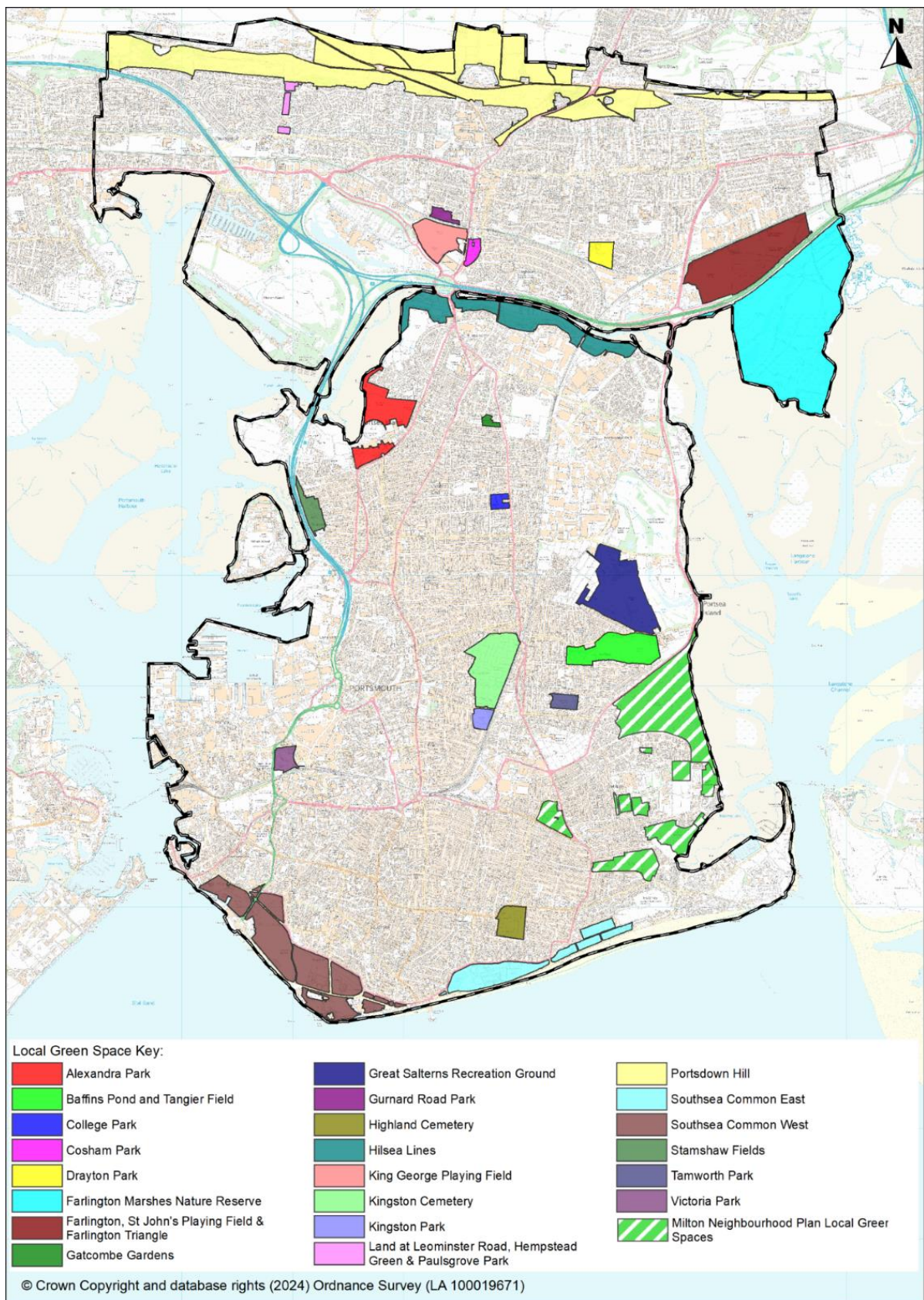


Figure 8: Local Green Spaces in Portsmouth

Flooding

- 4.26 Portsmouth is a low-lying coastal City, with the majority of the City being susceptible to flooding from the sea as shown by the amount of the City that falls within tidal flood zones 2 and 3 (figure 11). Flood risk is expected to increase as climate change causes future sea level rise. The City is currently undergoing significant flood defence works to mitigate this risk in certain areas. Flooding remains a major constraint on development in the City.
- 4.27 The Council has prepared a Strategic Flood Risk Assessment (SFRA) as part of the evidence base for the Local Plan which assesses potential sources of flooding in the City and sets out potential mitigation including the flood defence works which are currently underway around Portsea Island.
- 4.28 The Level 1 SFRA³⁷ undertaken jointly with PfSH is a high-level assessment of flood risk. The Level 1 SFRA is read in conjunction with the Level 2 Strategic Flood Risk Assessment³⁸ for PCC and associated appendices. The Level 2 SFRA and associated appendices together with the addendum to the Level 2 SFRA provide more detailed information about the nature of flood risk at the strategic sites and site allocations for future flood risk.
- 4.29 The Level 2 SFRA also identifies further work that may be required by the LPA or developers before the planning application stage, to determine satisfaction of the exception test. The SFRA document on its own does not provide justification for allocation of specific sites, however it provides recommendations for how part 2 of the exception test could be satisfied.
- 4.30 Due to the coastal and low-lying nature of the majority of the City there has been significant construction of new flood defences by Coastal Partners³⁹ around the perimeter of Portsea Island. In considering the areas of the City which can be developed the presence of these flood defences can be taken into account. The Sequential and Exception Test paper⁴⁰ sets out the position in respect of flood risk in the City making explicit reference of the presence of existing and proposed flood defences.
- 4.31 Despite the presence of flood defences for much of the City development still needs to be safe from flood risk over its lifetime, especially taking into account the increased risk of flooding due to climate change. Policy PLP 31 of the Pre Submission Local Plan (2024) sets out requirements to ensure that this is the case and that development in the City reduces flood risk, is resilient and ensures the future safety of residents by providing for safe access and egress.

³⁷ <https://www.push.gov.uk/wp-content/uploads/2024/05/SFRA-Part-1-Main-Report-V6-15.02.24.pdf>

³⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/PCC-Level-2-SFRA_Version-5-18-Nov-25.pdf

³⁹ <https://coastalpartners.org.uk/>

⁴⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/PCC-Sequential-and-Exception-Test-2025-Final.pdf>

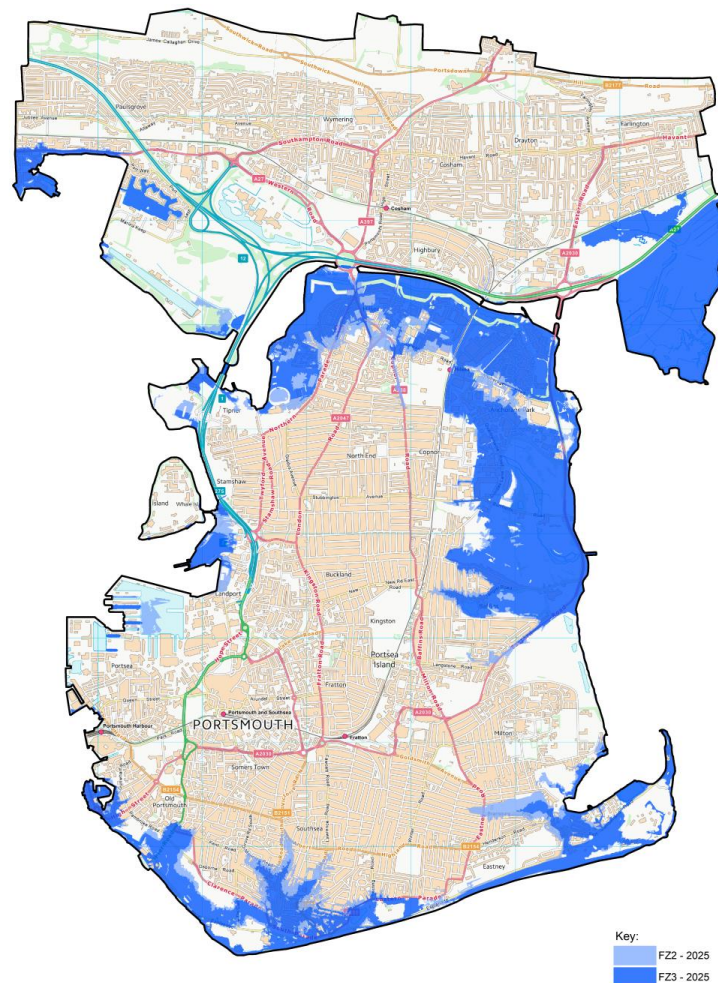


Figure 91: Areas at risk of Tidal Flooding (Flood Zones 2 and 3)

Heritage Assets

4.32 Portsmouth is a unique island City with an historic environment that is extensive and diverse both geographically and in age. Its buildings and archaeology tell the City's story, contributing to its sense of place, community and local distinctiveness. Portsmouth has been shaped for most of its history by the presence of the Royal Navy, an association that stretches back almost a thousand years. This legacy is reflected in the sheer number of heritage assets in the City as shown in table 3 and by the area of the City covered by conservation areas as shown in figure 12. The City's heritage assets are not necessarily a constraint to development but do need to be taken into account when planning for new development. Many heritage assets play an important role in place making in the City and are key to many of the Local Plan strategic sites and site allocations, notably Fraser Range, St John's College and St James' and Langstone Campus.

Asset Type	Number of Assets (2019)	
Scheduled Monuments	17	
	List Entries	Individual Buildings / Structures
Statutory Listed Buildings	463	707
Grade I	21	
Grade II*	34	
Grade II	483	
Conservation Areas (Article 4 Directions)	25 (28)	
Registered Parks and Gardens	3	
Locally Listed Buildings	264	

Table 3: Heritage Assets in Portsmouth

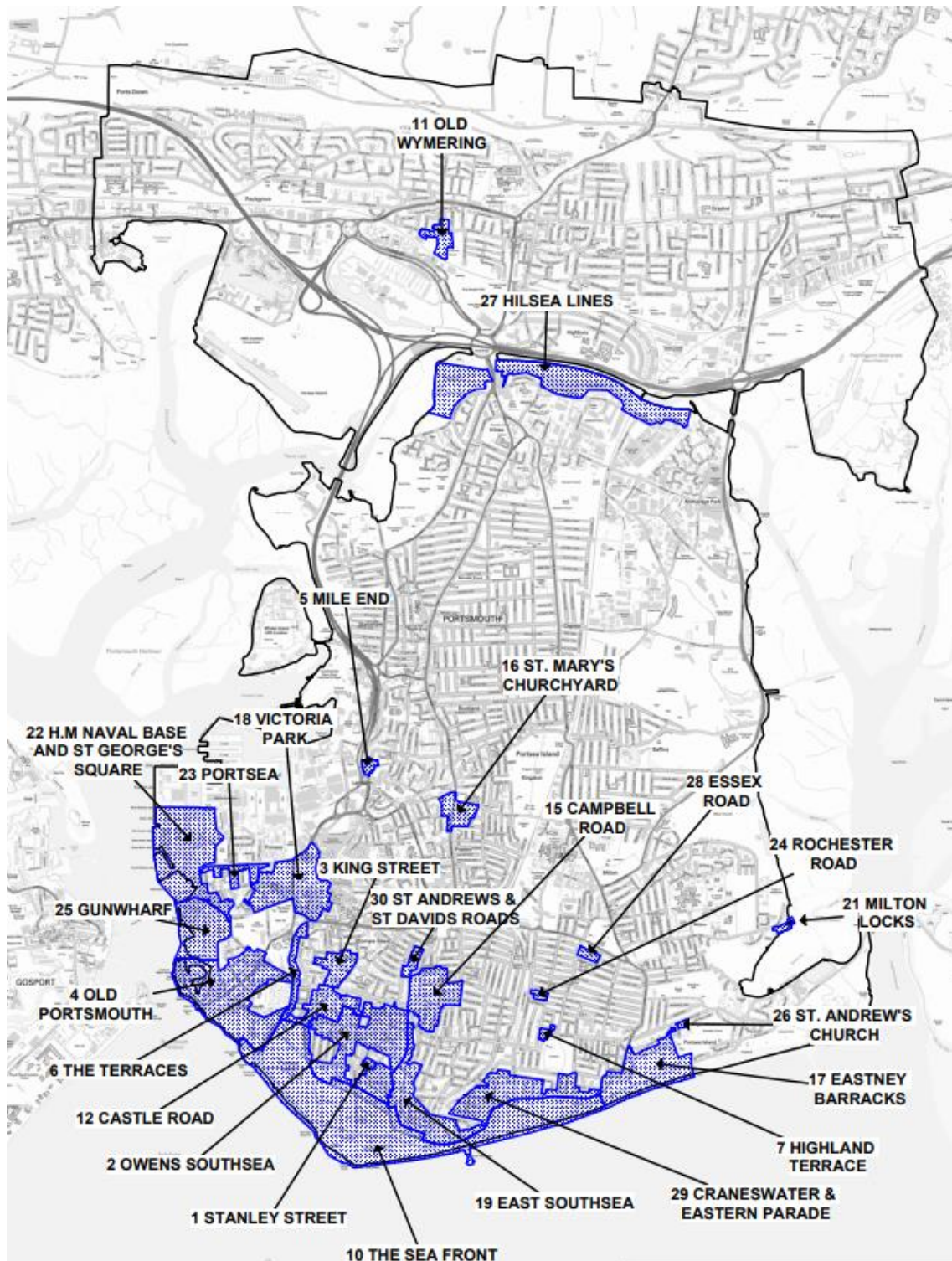


Figure 2: Conservation Areas in Portsmouth

Air Quality Constraints

4.33 Being an island city with only three access roads the City faces unique challenges to improving air quality. Air pollution has negative effects on health and can have a disproportionate impact on the most vulnerable in society such as children, older people and those with pre-existing medical conditions. The City was covered by a total of thirteen Air Quality Management Areas (AQMAs) (designated for the presence of Nitrogen dioxide NO₂) of which nine were wholly or partially revoked in 2010.

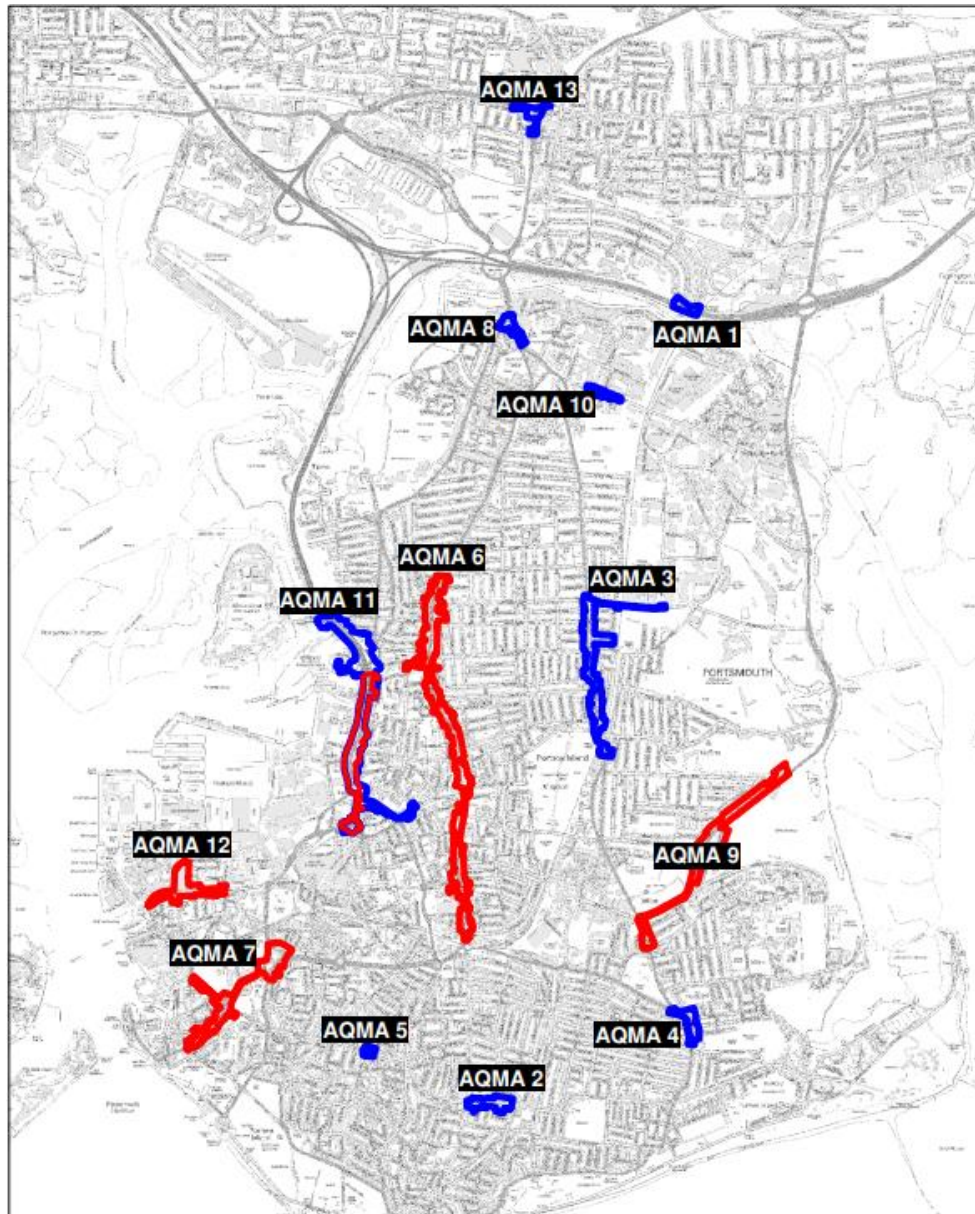


Figure 3: Air Quality Management Areas (AQMAs) in Portsmouth (those shown in blue are revoked and those in red retained)

4.34 In 2018 Portsmouth City Council was identified as one of a number of local authorities across the UK found to be in breach of legal limits for average annual concentrations of nitrogen dioxide. There has been a Clean Air Zone (CAZ) implemented in the City to help tackle air pollution. The CAZ is Class B, which means that it targets taxis and Private Hire Vehicles, buses, coaches and Heavy Goods Vehicles. The

Location of the CAZ is shown on figure 14. The CAZ impacts the City Centre Strategic Site which it overlaps.

- 4.35 The Portsmouth Emissions Based Assessment⁴¹ was commissioned in response to the identified air quality issues in the City Centre and considered the impact of the development identified in the Local Plan. The assessment indicated that there are roads in the City Centre where there are expected to be increases in NOX emissions including around the Cascades Shopping Centre and Market Way.
- 4.36 These findings resulted in changes to the City Centre Road scheme and further specific modelling through the 'Portsmouth City Centre Road Scheme - Air Quality Assessment for the Local Plan report'. This report concluded that: 'As concentrations are well below the relevant AQS objectives and the NO2 limit value in 2041, no mitigation measures are required or recommended at this stage.'
- 4.37 Policy PLP6 of the Pre-Submission Local Plan Addendum responds to poor air quality in the area by requiring that proposals 'Provide evidence that air quality in adjoining AQMAs is not worsened'.

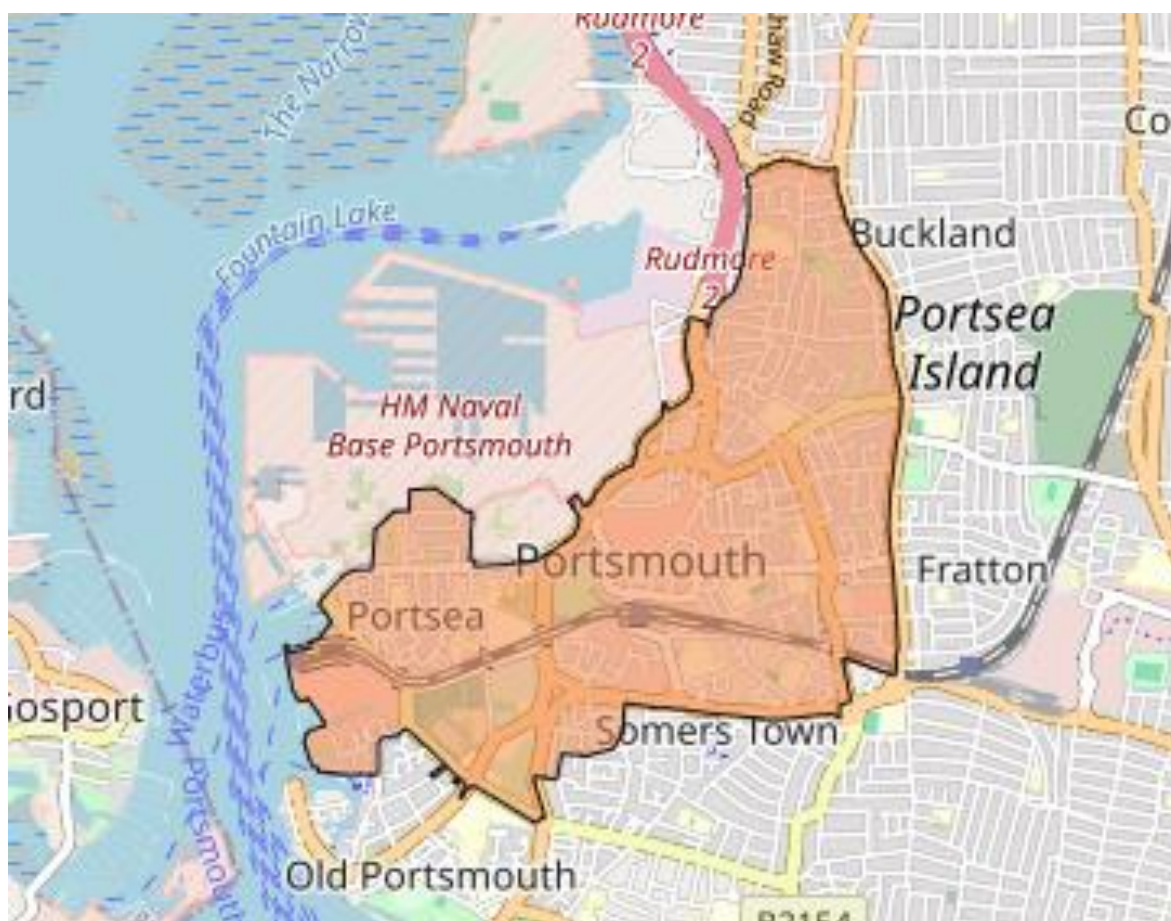


Figure 10: Clean Air Zone

⁴¹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/climate-emergency/>

Land Ownership constraints

4.38 Within Portsmouth there are several large public landowners which represent both a constraint and opportunity for future development. The MoD are a significant landowner in the City as are Portsmouth University. The largest individual landowner, however, is the City Council, which presents an opportunity to bring forward development in the City through the promotion of development opportunities.

Ministry of Defence Land

4.39 Portsmouth is the home of the Royal Navy. In addition to Portsmouth Naval Base which occupies much of the western side of Portsea Island there are active military facilities at Whale Island and Horsea Island as well as Ministry of Defence (MoD) Sport Facilities at HMS Temeraire. In addition, there are areas of MoD housing in the City in Hilsea, Drayton and Eastney. The MoD's estate (see figure 15) in the City has reduced in recent years with some areas such as Tipner Firing Range passing to Council control. The City Council and Defence Infrastructure Organisation meet monthly and have prepared a joint Statement of Common Ground (SoCG)⁴². This references specific constraints related to MoD land in the City including the Horsea Island Strategic Open Space Strategic Site which has a specific constraint in the form of a blast zone due to a munitions store of the adjoining defence dive training site. The impact of this zone is taken into account in the proposed policy for Horsea Island in the Local Plan. Overall, the MoD makes a major contribution to the City's economy, including 13,000 jobs at His Majesty's Naval Base as detailed in the SoCG.

⁴² https://www.portsmouth.gov.uk/wp-content/uploads/2024/12/PCC_DIO_SCG_DefenceSites_VFINAL_SIGNED.pdf

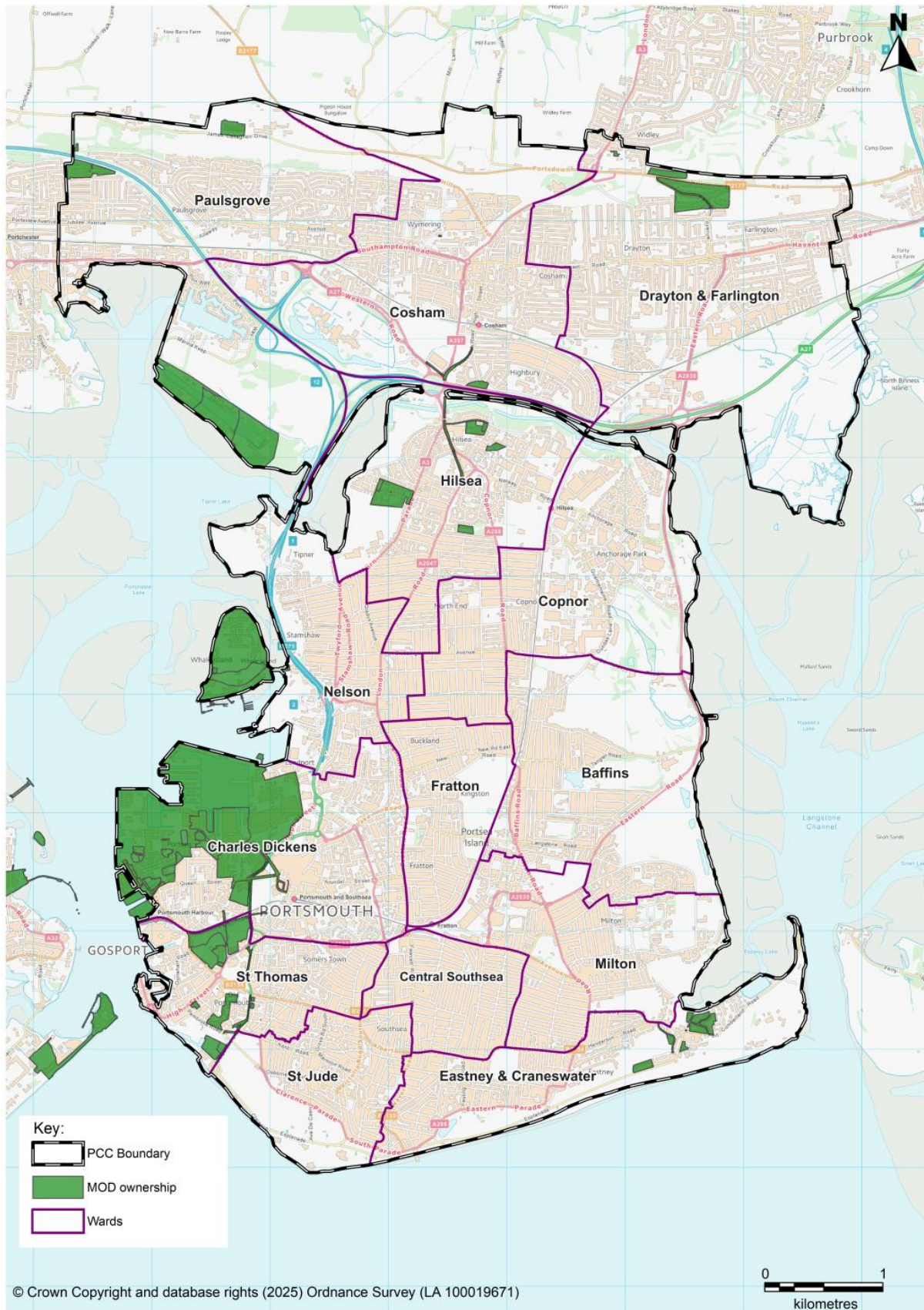


Figure 11: MoD Land Holdings

Portsmouth City Council Land Holdings

4.40 PCC is the largest individual landowner in the City (figure 16). Much of the City Council's land is restricted in its potential use as it is currently in use as public open space, nature reserves and as economic assets such as the commercial port and industrial and office parks. These areas of land play key amenity, health and economic roles in the City, as set out in this paper, and are therefore, protected as such.

4.41 In many instances however, ownership has been an opportunity that the City Council has looked to exploit in order to promote growth in the City. This is reflected in the Local Plan allocations and policies bringing forward development on Council owned land as shown in table 4.

Allocation or Policy delivering wholly or largely on Council owned land	Development being brought forward
PLP3: Tipner West	1,000 homes, 25,000sqm employment, flood defences, local shop and community facilities, land safeguarded for new bridge.
PLP4: Tipner East (part)	Transport hub
PLP5: Lakeside North Harbour	50,000sqm of employment floorspace
PLP6: Portsmouth City Centre (City Centre North)	3,458-4,158 homes, 5,846sqm of employment floorspace, 2.9ha park
PLP9: Horsea Island Strategic Open Space	64ha of Strategic Open space
PLP 15: Somers Orchard	566 dwellings
PLP23: Estate Renewal	Residential led renewal of the Council's housing estates

Table 4 - Development proposed on majority City Council owned sites.

4.42 The Council has grasped the opportunity provided by its land ownership and is proposing through the Local Plan to use those assets to bring forward approximately, 5,024-5,724 homes, 802,846 sqm of employment floorspace and 66.9 ha of new public open space.

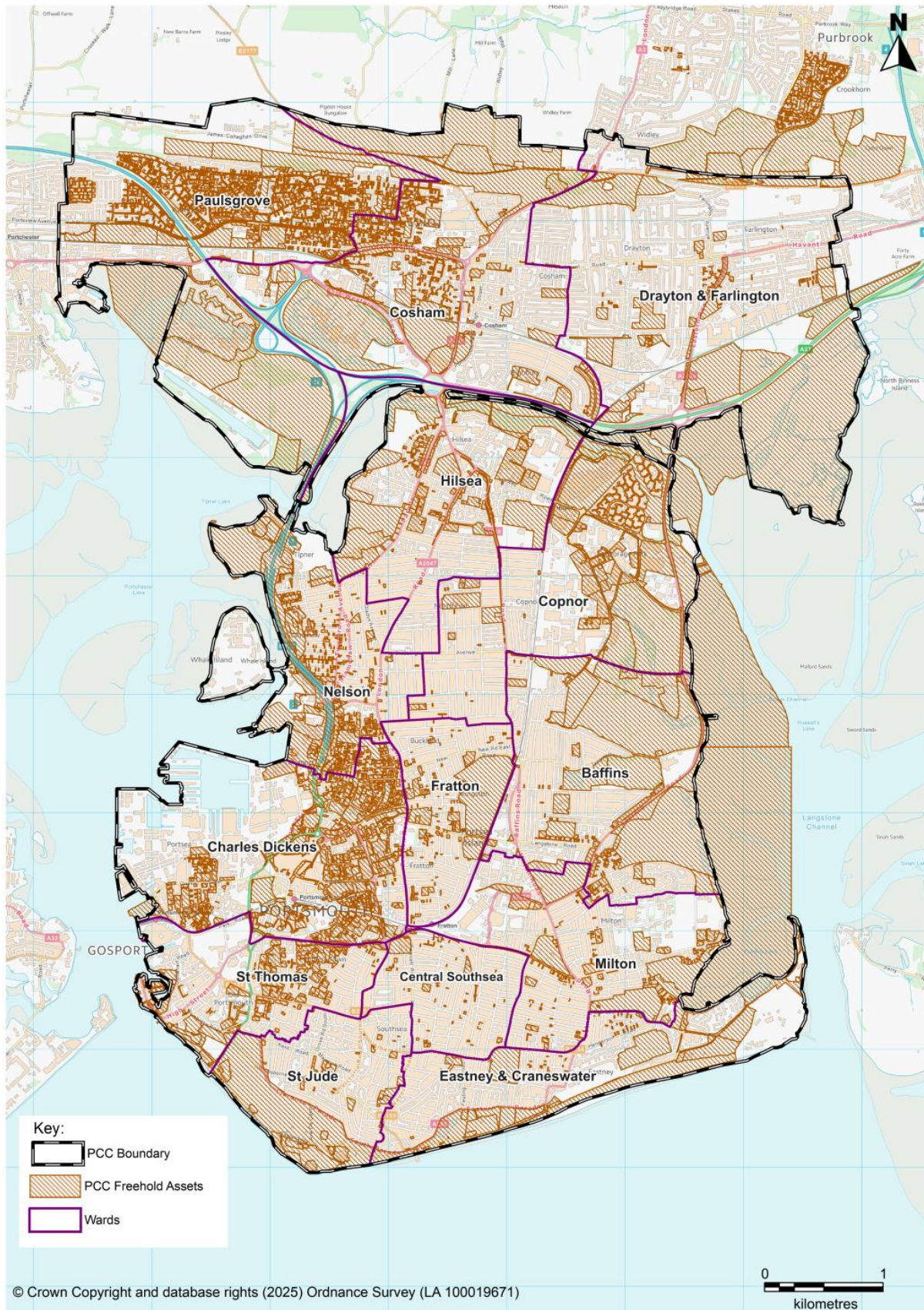


Figure 12: PCC Land Holdings

University of Portsmouth Land Holdings

- 4.43 The University of Portsmouth is another substantial landowner within the City with holdings mainly around their campus in the City Centre and elsewhere in the City such as at Langstone Campus in Milton. The land the university owns is not a constraint on growth per se though it is largely limited to educational uses. Overall, the University is a driver of economic growth in the City. The University has ambitious plans to bring forward development across their campus as set out in their Estates Masterplan⁴³. The City Council is working closely with the University to promote this opportunity and has a Planning Performance Agreement agreed to expediate this. The University is also the landowner of part of one of the proposed allocations in the Local Plan at St James' and Langstone Campus (PLP8). The portion of the development site on the University's land at this site is expected to deliver 120 dwellings.

⁴³ <https://www.port.ac.uk/about-us/our-ambition/building-our-future>

5. How the constraints have informed the Development Strategy

5.1 The constraints identified in this Paper have influenced formulation of the development strategy set out in the Local Plan. The process of how constraints have been accounted for is detailed in a series of documents including:

- Sustainability Appraisal (in particular the Scoping Report)
- Habitats Regulations Assessment
- Allocations Topic Paper
- Housing and Economic Land Availability Assessment.
- Strategic Transport Assessment
- Emissions Based Assessment
- Level 2 Strategic Flood Risk Assessment for Portsmouth City Council

5.2 In addition to these documents, there are many other evidence documents too numerous to list here that provide further evidence of how the development strategy of the Local Plan has been shaped. These are listed on the Portsmouth Local Plan evidence⁴⁴ web page.

Sustainability Appraisal

5.3 The Sustainability Appraisal (SA)⁴⁵ for the Local Plan has been undertaken in parallel with the preparation of the Local Plan and recognises the constraints as set out in this Paper and taking them into account in its consideration of growth options and the proposed development strategy.

5.4 The SA goes into further detailed consideration on the strategic sites and site allocations, considering their merits and constraints, and sets out how site-specific policy seeks to positively address constraints identified associated with nature conservation and transport, flood risk, health, heritage and natural resources.

5.5 The SA informing the Pre-Submission Portsmouth Local Plan (2025 SA Report Update) built upon the SA work that was undertaken for the Regulation 18 Local Plan (2021) which identified a series of broad locations that were considered unsuitable for development for a several overlapping reasons. These reasons tie in with the constraints as set out in this Paper. The areas that were identified as unsuitable for significant development in the SA (figure 17) were:

- Southsea Common: For its historic, civic, open space, community, commercial and tourist roles as well as specific environmental, historic and flood risk constraints
- Milton Common: For its important open space, recreation facility, and nature conservation role. It is also limited as former landfill.
- Great Salterns Recreation Ground and Golf Course and Baffins Pond: For its open space, education and nature conservation roles as well as flood risk constraints.

⁴⁴ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

⁴⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

- Hilsea Lines: For their open space, heritage, and nature conservation value.
- Portsdown Hill: for its open space, landscape character, archaeological importance, heritage and nature conservation role.
- Farlington Marsh: For its nature conservation, open space and recreation role.
- Horsea Island (excluding South East corner)/ HMS Excellent: For its nature conservation and open space potential, and its former use as a landfill site.
- Whale Island: As Naval Command HQ for the UK.
- Portsmouth Commercial Port: As the City's commercial port serving both the continental ferries and commercial container ships.
- Portsmouth Naval Base: As one of the Royal Navy's most import bases since 1194.

5.6 The 2025 SA demonstrates how the City Council considered the options available for overcoming the constraints as set out in this paper. These are set out in section 5 (Tipner West) and section 7 (Assessment of the wider local plan against the SA objectives) and section 8 (conclusions and recommendations). The conclusion of the SA is that the City Council's chosen Local Plan approach results in broadly positive effects overall.

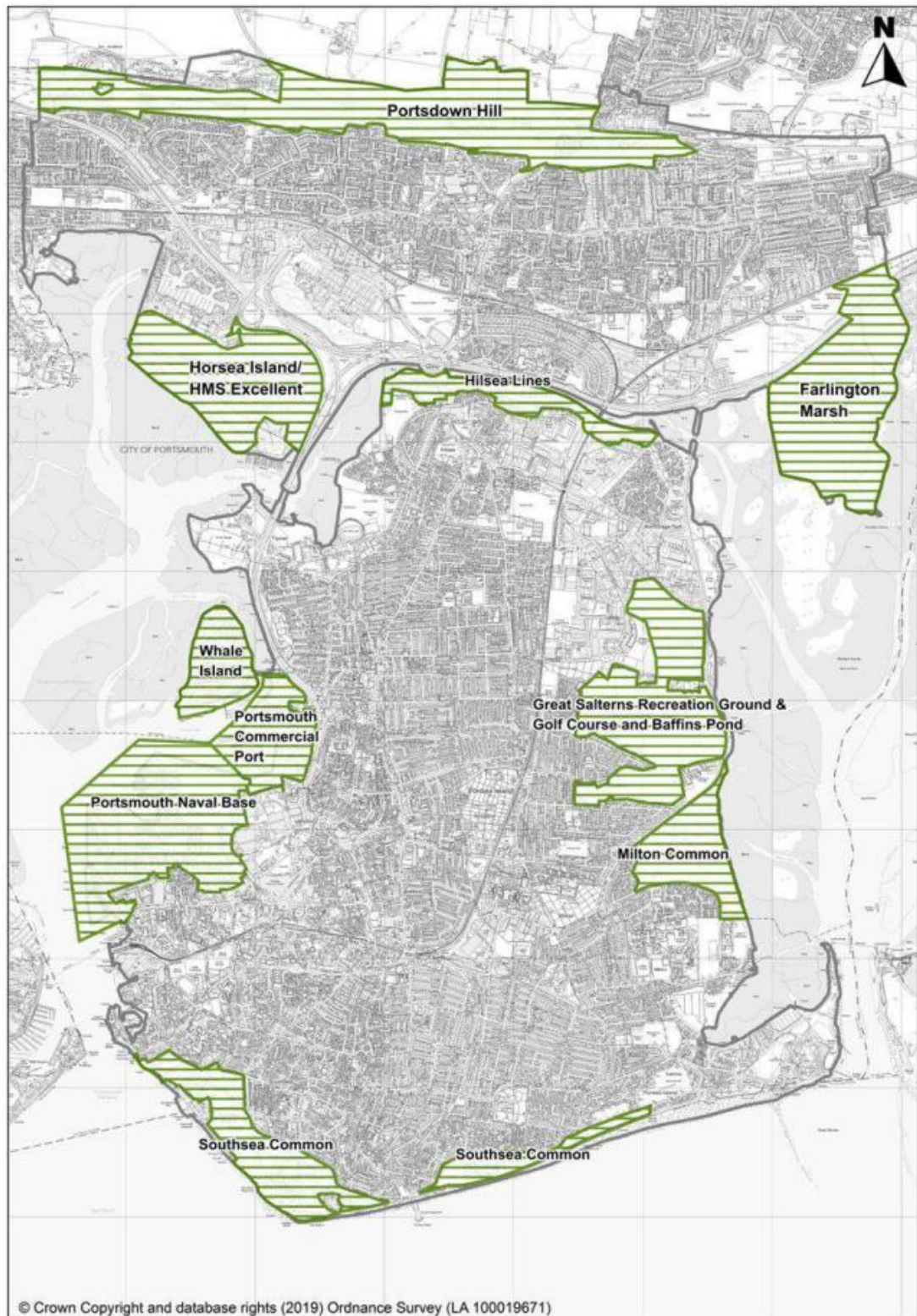


Figure 13: Broad Locations Considered Unsuitable for Significant Housing or Economic Development in the 2018 Interim Sustainability Appraisal⁴⁶

⁴⁶ (taken from Figure 5.1, page 15 of the Regulation 18 SA Report) https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Portsmouth-LDP-SA_Interim-Reg-18-SA-Report_publication-draft_140921_compressed.pdf

Habitats Regulation Assessment.

- 5.7 The objective of the Habitats Regulations Assessment (HRA)⁴⁷ for the Local Plan is to identify any aspects of the Local Plan that would cause likely significant effects on, or adverse effects to the integrity of internationally designated nature conservation sites.
- 5.8 The driver for the Council to undertake the Addendum⁴⁸ to its Local Plan was the need to advance a Plan that could be delivered without adverse effects on the international conservation designations that cannot be mitigated. The decision to avoid adverse impacts on Portsmouth Harbour meant that the regionally significant marine employment hub which had been proposed at Tipner West & Horsea Island East, providing much needed new jobs and opportunities for training, could not be brought forward. The 2025 HRA concludes that the Local Plan as revised through the Addendum has no elements that will have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects.

Allocations Topic Paper

- 5.9 The Allocations Topic Paper⁴⁹ sets out the rationale for the chosen spatial approach in the Local Plan by summarising the evidence base which supports the allocations proposed in the Portsmouth Local Plan. The paper references the key constraints as set out in this paper and shows how they were taken into account in reaching the preferred approaches for the Strategic Sites and allocations.
- 5.10 The paper outlines the site selection methodology focusing upon the strategic sites (PLP figure 4.1) and site allocations (PLP figure 5.1) as covered by site-specific policies.
- 5.11 The Topic Paper provides site summaries for each of the seven strategic allocations and six site allocations. These provide key information about each site, signposting key parts of the relevant evidence base documents which have influenced their allocation and affected detailed wording of the policies.

Housing and Employment Land Availability Assessment

- 5.12 The Portsmouth Housing and Employment Land Availability Assessment (HELAA) demonstrates the availability of sites for development, showing how land may be brought forward to meet local development requirements. The HELAA assesses all sites able to accommodate five dwellings or more, or 0.25ha in size or capable of accommodating 500sqm or more of employment floorspace. The HELAA comprises a methodology document⁵⁰, the main report and appendices⁵¹ and a spreadsheet showing detailed

⁴⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

⁴⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf>

⁴⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Allocations-Topic-Paper-RS-Nov-2025-PDF-FINAL-VERSION.pdf>

⁵⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/01-PCC_Housing-and-Economic-Land-Availability-Assessment_Methodology-v3.pdf

⁵¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/HELAA-2025.pdf>

constraints. These documents identify the constraints that impact each HELAA site and set out how these constraints have influenced the decisions made in respect of those sites, for example, the type or quantum of development they can accommodate.

- 5.13 The HELAA assessed sites for their potential for being deliverable or developable. Larger deliverable and developable sites which have scope to provide multiple benefits beyond housing and employment are covered by strategic site and allocation policies in chapters 4 and 5 of the Local Plan⁵². Sites which do not offer wider benefits, and which are generally smaller than those proposed for allocation are identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025.

Strategic Transport Assessment

- 5.14 The Strategic Transport Assessment (STA)⁵³ modelled the impact of the proposed Spatial Strategy (including all the allocated and identified sites in the Local Plan) from the Local Plan on the National and Local Road Network. This identified a series of junctions that needed to be improved in order to address capacity constraints in the road network. These junction improvements have been included in the Council's Interim Infrastructure Delivery Plan⁵⁴.

The Portsmouth Emissions Based Assessment and Portsmouth City Centre Road Scheme - Air Quality Assessment

- 5.15 The Portsmouth Emissions Based Assessment was commissioned in response to the identified air quality issues in the City Centre and considered the impact of the development identified in the Local Plan and the growth in traffic volumes as modelled by the STA. The assessment indicated that roads in the City Centre were expected to result in increases in NOX emissions including around Cascades Shopping Centre and Market Way.
- 5.16 These findings resulted in further detailed modelling following changes to the City Centre Road scheme, these were taken into account in the 'Portsmouth City Centre Road Scheme - Air Quality Assessment for the Local Plan. This report concluded that: 'As concentrations are well below the relevant AQS objectives and the NO2 limit value in 2041, no mitigation measures are required or recommended at this stage.' The revised City Centre Road Scheme is included in the council's Interim Infrastructure Delivery Plan.

⁵² <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

⁵³ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/Portsmouth-Local-Plan-Interim-Strategic-Transport-Assessment-Addendum-041225.pdf>

⁵⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/FINAL-IDP-2025-version-November-2025-v1.pdf>

Strategic Flood Risk Assessment Level 2 Strategic Flood Risk Assessment for Portsmouth City Council

5.17 The Level 2 Strategic Flood Risk Assessment for Portsmouth City Council (SFRA)⁵⁵ assessed the flood risk constraints that impacted the Strategic Sites and Allocations in the Local Plan. Based upon these constraints the SFRA set out a series of recommendations for the sites (section 14) in order for them to minimise the risk posed by flooding. These recommendations have been taken on board in the policies for the Strategic Sites and Allocations as detailed in the relevant local plan policies (chapters 4 and 5) and in policy PLP 31 (flooding) and in the flood management section of the IDP.

6. Conclusion

6.1 The City of Portsmouth has a constrained island geography. The Council as the Local Planning Authority has undertaken significant work as summarised in this Paper in order to overcome constraints wherever possible and to demonstrate that no stone has been left unturned approach to deliver development in Portsmouth.

6.2 The Council as a landowner is an active partner in many of the City's development sites and pursues a positive approach to the delivery of development in the City.

6.3 This paper clearly demonstrates that physical limitations prevent Portsmouth from realising its full Standard Method housing number. However, the constraints-based target set through the Local Plan is both ambitious and positively prepared given the constraints the Council faces. The extent of changes made to the Local Plan to address and overcome these constraints and the extent of the projects identified in the IDP to enable development is testament to the Council's positive preparation of its Local Plan.

6.4 Local Government Reorganisation represents an opportunity to overcome these challenges, particularly if revised authority boundaries are set in a manner that provides space for growth, helping to meet the needs of Portsmouth residents. The City Council will continue to work to positively and to ambitiously plan for the future needs of the City going forward to deliver the growth it needs despite the challenges.

⁵⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/PCC-Level-2-SFRA_Version-5-18-Nov-25.pdf