

Statement of Common Ground

**Portsmouth City Council as Local Planning
Authority
& the
Environment Agency**

February 2026



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1. Introduction

What is the Statement of Common Ground?

- 1.1. This Statement of Common Ground (SGC) is a jointly agreed statement between Portsmouth City Council (PCC) as the Local Planning Authority (LPA) and the Environment Agency (EA). It sets out the position and understanding with respect to key strategic issues between the City Council and the EA. It is not binding on either party but sets out a clear and positive direction to inform ongoing strategy and plan making. It should be noted that this is a bilateral agreement between these two organisations only.
- 1.2. This SCG has been prepared in accordance with the National Planning Policy Framework (NPPF) (2024) and the Planning Practice Guidance on Maintaining Effective Cooperation.

2. Relationship between Portsmouth City Council and the Environment Agency

- 2.1. The EA are a specific consultee in the planning process. The EA provide advice to LPAs on developing the evidence, plans and policies they need to demonstrate how growth will be delivered within the capacity of the water environment and infrastructure.
- 2.2. The EA are a member body of the Tipner West Regulatory Panel. The Panel was established in January 2021 to act as a coordinated consultation body to consider matters relating to the Tipner West project, as promoted by PCC as landowner ("PCC-Promoter"). Its members comprise the following specific consultees and non-statutory interest groups:
 - 2.3. Specific consultees:
 - Natural England (NE);
 - Environment Agency (EA);
 - Marine Management Organisation (MMO);
 - Historic England (HE).
 - 2.4. Plus general interest groups as regular guest panellists:
 - Royal Society for the Protection of Birds (RSPB); and
 - Hampshire and Isle of Wight Wildlife Trust (HIWWT).
- 2.5. The Panel was established in line with the Coastal Concordat¹, which seeks to streamline the multiple consenting processes for coastal developments in England. There are five high level principles in the Coastal Concordat:
 - i. Applicants seeking regulatory approval should be provided with a first point of entry into the regulatory system for consenting coastal development, guiding them to the organisations responsible for the range of consents, permissions and licences which may be required for their development.
 - ii. Regulators should agree a single lead authority for coordinating the requirements of Environmental Impact Assessments or Habitats Regulations Assessments.

¹ <https://www.gov.uk/government/publications/a-coastal-concordat-for-england/a-coastal-concordat-for-england-revised-december-2019>. The Concordat was originally an agreement between the Department for Environment, Food and Rural Affairs (DEFRA), the Department for Communities and Local Government (MHCLG), the Department for Transport (DoT), the MMO, the EA, NE and the Local Government Association Coastal Special Interest Group. It applies to the consenting of projects that span the intertidal area in estuaries and on the coast and require multiple consents including both a marine licence and a planning permission from the local planning authority.

- iii. Where opportunities for dispensing or deferring regulatory responsibilities are legally possible and appropriate, they should be taken.
- iv. Where possible, at the pre-application stage, competent authorities and statutory advisors should agree the likely environmental and habitats assessment evidence requirements of all authorities at all stages of the consenting process.
- v. Where possible, regulators and statutory advisors should each provide coordinated advice to applicants from across their respective organisations.

2.6. The Panel was established to deliver on these principles with respect to the proposed strategic allocation of Tipner West². To this end, a "Working Protocol" was prepared which reflects the Concordat principles and supports the Panel in providing a clearly defined and coordinated regulatory body for the purposes of engagement with the Promoter.

PCC-LPA as Competent Authority for Habitats Regulations Assessment (HRA)

2.7. The City Council is the LPA for the purposes of plan-making and determining planning applications made under the Town and Country Planning Acts and is also the Competent Authority as defined under the Conservation of Habitats and Species Regulations 2017 (as amended).

PCC-Promoter

2.8. The City Council is also acting as a site promoter, through the 'Tipner Regeneration Project' (TRP), which is tasked with delivering the project. A separate Statement of Common Ground will be entered into between PCC-LPA and the PCC-Promoter.

Key Strategic Matters

2.9. This section sets out where agreement has been reached on strategic matters, or where further work to reach common ground is required.

Representations on the Pre-Submission Portsmouth Local Plan 2024

2.10. The EA made several representations on the policies in the Pre-Submission Portsmouth Local Plan (Regulation 19) consultation held between July - September 2024. The EA's position, PCC's position and response, and evidence of collaboration between the two parties are detailed below. The EA's full representation on the Pre-Submission Local Plan 2024 is set out in Appendix 1 of this Statement.

2.11. The overarching policies in relation to flood risk within the emerging Portsmouth Local Plan are Policy PLP31 (Flooding) and Policy PLP32 (Sustainable Drainage Systems). Within the Portsmouth Regulation 18 Local Plan, these were both covered under one policy and have since been separated due to the importance of flooding and the detailed approach required. The City Council has liaised closely with the EA in drafting these policies and taken all Regulation 18 comments into consideration.

2.12. PCC have worked closely with the EA following the Regulation 18 Local Plan consultation. Amendments were made to the Local Plan following the completion of the Strategic Flood Risk Assessments (Level 1³⁴ and 2⁵) which the EA were closely linked to throughout preparation. With guidance from the EA, recommendations included within the SFRA have been included within the Local Plan where relevant.

² Formerly Tipner West and Horsea Island East in the Pre-Submission Portsmouth Local Plan (July 2024)

³ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-1-Main-Report-V6.pdf>

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-5-Portsmouth-CC-Final-V3.pdf>

⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/PCC-Level-2-SFRA_Version-4-Final.pdf

- 2.13. The EA are supportive of Policy PLP31 within the Pre-Submission Portsmouth Local Plan 2024. The EA proposed minor amendments which have been included within the Schedule of Changes to the Pre-Submission Portsmouth Local Plan 2024, which will be submitted to PINS along with the Local Plan. The EA suggested that the Sequential and Exception Test (2024) could be made more robust through the use of hazard mapping. Both parties agree however that this would not alter the outcomes of the sites proposed within the Local Plan.
- 2.14. The EA were supportive of Policy PLP37 (Contaminated Land); Policy PLP39 (Biodiversity) and Policy PLP40 (Biodiversity Net Gain).
- 2.15. The EA provided comments on four allocations within the Pre-Submission Portsmouth Local Plan 2024.
- 2.16. There was overall support for Tipner East (PLP4). Minor amendments proposed have been included within PCC-LPA's schedule of changes. The EA identified the provision of safe access and egress could be challenging for the allocations of Port Solent (PLP11) and Fraser Range (PLP13). PCC understand that the EA does not normally comment on or approve the adequacy of flood emergency response procedures. This is for the LPA to determine. The EA did not find either of these site allocations unsound. Development at Fraser Range has had resolution to grant planning permission since May 2024 in line with the allocation policy.
- 2.17. The EA provided detailed comments in respect of Tipner West and Horsea Island East (PLP3).
- 2.18. PCC has prepared a new policy PLP3: Tipner West through the Portsmouth Pre-Submission Local Plan Addendum 2025. Therefore, PCC will not be taking forward Policy PLP3: Tipner West and Horsea Island East as presented in the Pre-Submission Local Plan 2024. For this reason, the detailed comments made by the EA on PLP3 from the Pre-Submission Local Plan 2024 are not discussed further in this Statement of Common Ground.

Representations on the Pre-Submission Portsmouth Local Plan Addendum 2025

- 2.19. In early 2025, PCC decided to prepare a Local Plan Addendum 2025 which would avoid adverse impacts on international nature conservation designations that could not be mitigated. Two strategic policies and six site allocation policies, including Tipner West (PLP3) and Port Solent (PLP11), as referred to above in the EA's representations in 2024, are included in the Addendum.
- 2.20. The EA made a representation on the Pre-Submission Portsmouth Local Plan Addendum 2025 (Regulation 19) consultation held between November 2025 - January 2026. The EA's full representation on the Pre-Submission Local Plan Addendum is set out in Appendix 2 of this Statement.
- 2.21. The EA have no objection to the Policy PLP3: Tipner West (2025) allocation.

Local Plan Evidence on Flooding

2.22. PCC-LPA have prepared supporting evidence for the Pre-Submission Portsmouth Local Plan 2024 and Pre-Submission Portsmouth Local Plan Addendum 2025 on flooding. This includes:

- i. An updated Strategic Flood Risk Assessment (SFRA) Level 1 Main Report⁶ prepared by AECOM in 2024, on behalf of ten local planning authorities in South Hampshire (the 'Partnership for South Hampshire' (PfSH)). Part 5⁷ of the SFRA Level 1 focusses on the flood risk posed to Portsmouth with recommendations made throughout for PCC to consider when developing the Local Plan, drafting strategic policies and establishing requirements for development management.
- ii. An updated SFRA Level 2⁸ was prepared by AECOM and originally published in 2024. The Level 2 SFRA provides more detailed information about the nature of flood risk in specific areas. The SFRA Level 2 was updated in November 2025 to support the Pre-Submission Portsmouth Local Plan Addendum 2025. This update is not a full update, but reflects changes made to site specific policies, including an amendment to the boundary for the Tipner West site. The site descriptions and proposed development sections were updated to reflect the Portsmouth Pre-Submission Local Plan Addendum 2025, and the maps for Tipner West were updated to reflect the new site boundary, but the recommendations as a whole did not change.
- iii. A Development and Flood Risk Topic Paper prepared in September 2024⁹ and updated in November 2025¹⁰. This document shows how the evidence on flooding, including the (SFRA) Level 1 Main Report, SFRA Level 1 Part 5, SFRA Level 2, and the Sequential and Exception Test 2024 and 2025, have informed the policies of the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025.
- iv. The Sequential and Exception Test 2024 prepared in June 2024¹¹, updated in November 2025¹² was informed by the SFRA Levels 1 and 2. The 2025 Update reflects the new flood maps for planning published by the EA in March 2025 and has also been informed by the Housing and Economic Land Availability Assessment 2025 which uses the latest flood mapping.

2.23. The EA were closely involved in the preparation of both the SFRA Level 1 (2024) and Level 2 (2024) and its 2025 Update. These documents set out a list of recommendations for PCC to consider. Those which were considered of particular importance were carried across into the relevant policy within the Pre-submission Local Plan. This was decided following discussions with the EA. Key strategic matters within the SFRA Level 1 which were discussed with the EA and a position agreed were:

- 1) Set back of development from sea defences/safeguarding land for flood management schemes

⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-1-Main-Report-V6.pdf>

⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-5-Portsmouth-CC-Final-V3.pdf>

⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/PCC-Level-2-SFRA_Version-4-Final.pdf

⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Flooding-Topic-Paper.pdf>

¹⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Flooding-Topic-Paper-2025-final.pdf>

¹¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PCC-Sequential-and-Exception-Test-FINAL.pdf>

¹² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/PCC-Sequential-and-Exception-Test-2025-Final.pdf>

- The EA were content that this was assessed on a site by site basis, rather than a specific measurement applied.

2) Definition of Flood Zone 3b

- The EA were content that there was no land defined as tidal Flood Zone 3b within Portsmouth's administrative boundaries. All other comments that the EA provided on the SFRA Level 1 were agreed by PCC and the relevant updates were made by AECOM.

2.24. Key strategic matters within SFRA Level 2 which were discussed with the EA and a position agreed before the Pre-Submission consultation were:

1) Safe access and egress (in particular at Port Solent, Fraser Range, The News Centre and St John's College)

- The EA and PCC agreed a detailed policy approach which was included within the strategic policy on flooding and within the above named sites.

2.25. It was agreed the SFRA Levels 1 and 2 provide a robust and up to date assessment of the risks at a strategic level and were used to inform the sequential and exception tests. The EA were satisfied that no strategic or allocated sites could be omitted from the Local Plan on grounds of flooding due to the very limited development options within Portsmouth. After allocation of these sites within the Local Plan (along with identified sites and expected windfall development) Portsmouth still does not meet its housing need in full as defined by the Standard Methodology. This is a primary contribution to the agreement that Portsmouth will need to allocate land that is in areas at risk of flooding.

2.26. The City Council is cognisant of the need for local planning authorities to formally consider the emergency planning and rescue implications of new development, and that consultation with emergency planning colleagues has taken place.

2.27. Both parties agree with the content of the supporting evidence base on flood risk. PCC has worked collaboratively with the Environment Agency throughout the Local Plan process. Both parties agree to continue to work together to ensure the robustness of the Local Plan and its supporting evidence base.

Update to Flood Maps for Planning

2.28. Following the publication of the updated EA flood maps for planning in March 2025, PCC (on behalf of PfSH) requested the EA's opinion on whether this would subsequently trigger a requirement to update the 2023 PfSH SFRA Levels 1 and 2 for each authority. At a Planning Officers Group of 4th April 2025, the EA confirmed that the SFRAs would not need to be updated to reflect the new mapping. The same coastal model was used for the SFRA and the updated EA mapping. The climate change scenarios modelling flood risk in the future within the SFRAs are considered more detailed and reliable than the climate change mapping published as part of the EA suite of maps.

2.29. Having reviewed both sets of data, the EA noted only slight differences with the current day mapping between the two sources of flooding. The EA therefore felt it would be disproportionate to require the SFRA Level 2 to be updated in response to the updated flood maps for far through the Local Plan preparation process. Both parties agree that there is no need to update the SFRA Level 2 to reflect changes to the EA flood map for planning made in March 2025.

3. Signatories

- 3.1. Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.
- 3.2. Both parties agree that they have engaged positively on an ongoing basis and that on this basis the Duty to Cooperate has been met.
- 3.3. Both parties agree that there are no substantial areas of disagreement between the parties relating to the emerging Portsmouth Local Plan and will both continue to work proactively on the key strategic cross boundary issues identified in the SCG.

Signed: 

Name: Lucy Howard

Position: Head of Planning Policy

Portsmouth City Council

Date: 12-02-265

Signed: 

Name: Laura Lax

Position: Planning Specialist

Environment Agency

Date: 12-02-26

Appendix 1: EA Representations on the Pre-Submission Local Plan 2024

Portsmouth Local Plan

Pre-Submission Response Form



Portsmouth
CITY COUNCIL

Portsmouth City Council has prepared a new Local Plan to guide development in the City up to 2040. This response form allows you to provide your views on the Pre-Submission version of the Portsmouth Local Plan (the 'Plan') along with its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment before it is submitted for examination to the Planning Inspectorate.

The consultation is open from 09 July 2024 to 23.59 on 03 September 2024.

Here is a link to the [Portsmouth Local Plan Evidence](#), which includes the Local Plan and other supporting documents.

Please contact the Planning Policy team by email at policyconsultations@portsmouthcc.gov.uk or phone 07990138226 if you have any queries or require this form in an alternative format.

Privacy Notice

Portsmouth City Council is the data controller of any personal data you provide on this form. It will only be used for the purpose of preparing the Portsmouth Local Plan and will only be held for as long as necessary for this purpose. Your comments and your name will be published on the City Council's website. We will make every effort to remove other personal details including telephone numbers, postal and email addresses and signatures prior to being uploaded. All representations received at this Pre-Submission stage will be sent to the Secretary of State for consideration at the Public Examination undertaken by an independent Planning Inspector appointed by the Planning Inspectorate (PINS).

For full details of how the council collects and uses personal data, please see the full [Data Protection Privacy Notice](#).

This survey uses software supplied by Evolutive. For full details of how Evolutive complies with the UK GDPR, please see their website and private notice ([Evolutive Website](#)).

How to complete this form

This form has three parts:

Part A Your Representation(s): fill in and submit a new response form for each representation you wish to make on a specific policy of the Pre-Submission Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment.

This is a technical consultation that focuses solely on legal compliance, compliance with the Duty to Cooperate and soundness. In order for the Plan to be legally compliant it needs to meet all legal and procedural requirements. All local planning authorities, including Portsmouth City Council, are under a Duty to Cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. The Government defines a Local Plan as sound if it is:

1. 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;
2. Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. 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
4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

Please provide all the supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Part B Personal Details: need only be completed once by each person responding to the consultation. Please provide your name, postal address, email address and any other contact information. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted.

Part C Diversity Monitoring: is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity and disability. This section only needs to be filled in once. Answering these questions allows the City Council to monitor responses from different groups and understand their views.

After this Pre-Submission consultation by the City Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Local Plan Policy



Policy *

Site Allocation Policy PLP13: Fraser Range



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

☒ Yes
☐ No

2(b) Sound: *

☒ Yes
☐ No

2(c) Complies with the Duty to
Co-operate: *

☒ Yes
☐ No

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

In relation to issues within our remit we have no soundness issues with this proposed allocation however we would provide the following comments to clarify our position.

The Level 2 SFRA identifies that the provision of safe access and egress could be challenging for this allocation, and there is a chance that voluntary and free movement of people during the design event may not be deliverable. The recently approved planning application failed to demonstrate that dry or limited depths of flooding to access routes were achievable. However, we are satisfied that the Level 1 & 2 SFRA adequately assesses and identifies the potential risks, and that Portsmouth City Council planners, in conjunction with their emergency planners, have used this information along with our technical advice when considering the inclusion of this allocation within the Plan. The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. We do not therefore find this allocation unsound, however Portsmouth City Council should be confident that the movement of people can be safely managed prior to, and during, a flood.

The robust assessment and understanding of wave overtopping and breach risk will be of paramount importance when determining the infrastructure required to reduce the risk of flooding to a safe level. We are therefore pleased to see the inclusion of these requirements, including suitable freeboard calculations.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in

examination hearing session(s)? *

☐ Yes

☒ No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B Personal Details:

If you are responding on behalf of an organisation, the postal address noted should be that of the organisation.

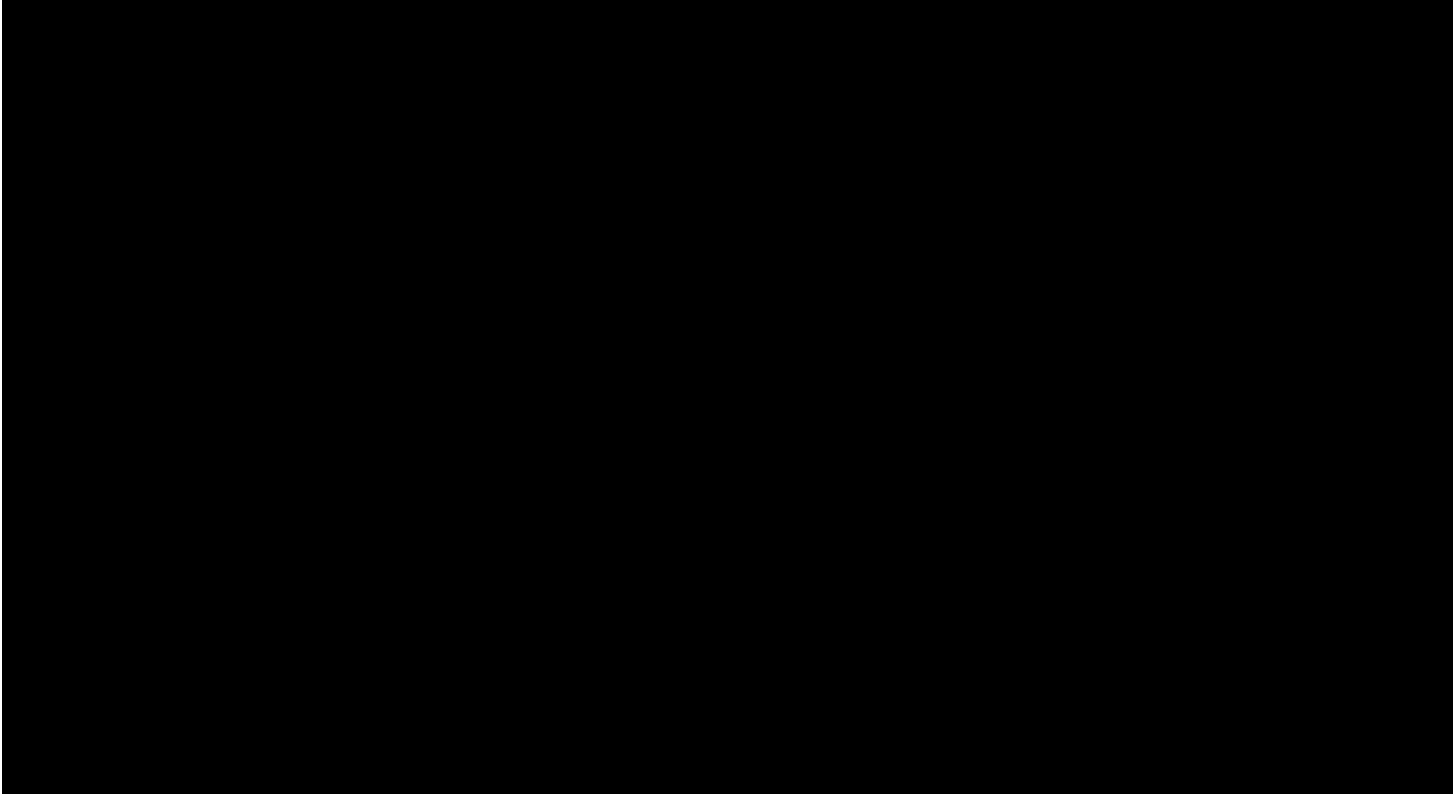
☐ Please select here if an agent has been appointed for this representation

1. Personal Details

Title	Mrs
Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	

Building Name	
Secondary Name	
Street	Canal Walk
District	
Town	Romsey
County	Hampshire
Postcode *	SO51 7LP
Telephone Number	
Email Address *	k

Please note: anonymous or confidential representations cannot be accepted.



* - Compulsory Question.

If you would like a copy of your completed response form, please e-mail the Planning Policy team at policyconsultations@portsmouthcc.gov.uk

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1. 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;
2. Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. 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
4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

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Part C Diversity Monitoring: is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity and disability. This section only needs to be filled in once. Answering these questions allows the City Council to monitor responses from different groups and understand their views.

After this Pre-Submission consultation by the City Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Local Plan Policy



Policy *

Strategic Site Allocation Policy PLP3: Tipner West & Horsea Island East



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

- ☐ Yes
☒ No

2(b) Sound: *

- ☐ Yes
☒ No

2(c) Complies with the Duty to Co-operate: *

- ☒ Yes
☐ No

3. If you have answered 'no' to any of questions 2(a) to (c) please give details of why you consider this part of the Local Plan or its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is not legally compliant, is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. *

We have concerns regarding the deliverability of this site especially in relation to biodiversity. Currently we do not feel that the evidence provided demonstrates the allocation could come forward without damage to the

environment, specifically the internationally and nationally designated sites. Our main concern relates to a lack of evidence regarding the availability and delivery of required mitigation/compensation sites.

As well as the local plan document we have reviewed the associated Habitats Regulations Assessment (HRA) which provides assessment for this allocation. The Environment Agency is not the decision maker with regards to the derogation case. However, based on our review of the HRA we do not agree with the conclusion. There is too much uncertainty attached to the evidence that underpins the conclusion.

As described in the HRA text, the policy wording sets out the requirement for the provision of replacement habitat. However, this provides no certainty that the replacement habitat can be found and/or no explanation as to the lead-in time required to ensure any replacement habitat is of a suitable quality and functioning before the loss occurs. Paragraph 6.33 of the HRA highlights that parcels of land have been identified as potential mitigation/compensation. In the absence of this information being shared, the validity of the statement cannot be supported.

The Regional Habitat Creation Programme, now referred to as the Habitat Compensation and Restoration Programme addresses coastal squeeze losses resulting from the hold the line policy of the North Solent SMP. However, any losses over and above what was included at the SMP stage e.g., resulting from increasing the size of flood defence, encroachment into the intertidal must be addressed. This has not been addressed in the HRA.

Whilst we acknowledge the continued engagement regarding this site through the Regulatory Panel, we are concerned that the HRA fails to reflect or highlight concerns and issues that have been raised at the Regulatory Steering Group meetings. It is acknowledged in paragraph 8.138 of the HRA that some panel members have raised concerns and questioned the value of continued use of the bespoke metric however in the absence of any detail of the sites identified as potential compensation, we are very sceptical of 400ha figure. This has been flagged at the Regulatory Panel meetings. We do not therefore support the level of confidence that has been assigned in the assessment to finding compensatory habitat.

In conclusion we do not feel that the evidence provided at this time to support this allocation is robust. Too much uncertainty remains regarding the deliverability of compensation/mitigation.

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

It is our opinion that the duty to cooperate has been met through the Regulatory Panel meetings and ongoing dialogue in association with this.

4. If you have answered 'no' to any of questions 2(a) to (c) please set out the modification(s) you consider necessary to make the Portsmouth Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at question 3 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. *

Further evidence is required to demonstrate that the mitigation/compensation for this site is available and deliverable.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? *

☐ Yes

☒ No

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☐ Please select here if an agent has been appointed for this representation

1. Personal Details

Title

Mrs

Forename *

Laura

Surname *

Lax

Job Title
(where
relevant)

Organisation
(where
relevant)

Environment Agency

Postcode
Look-up

Canal Walk, Romsey, Hamp...✕ ▼

Building Name

Secondary

Name

Street

District

Town

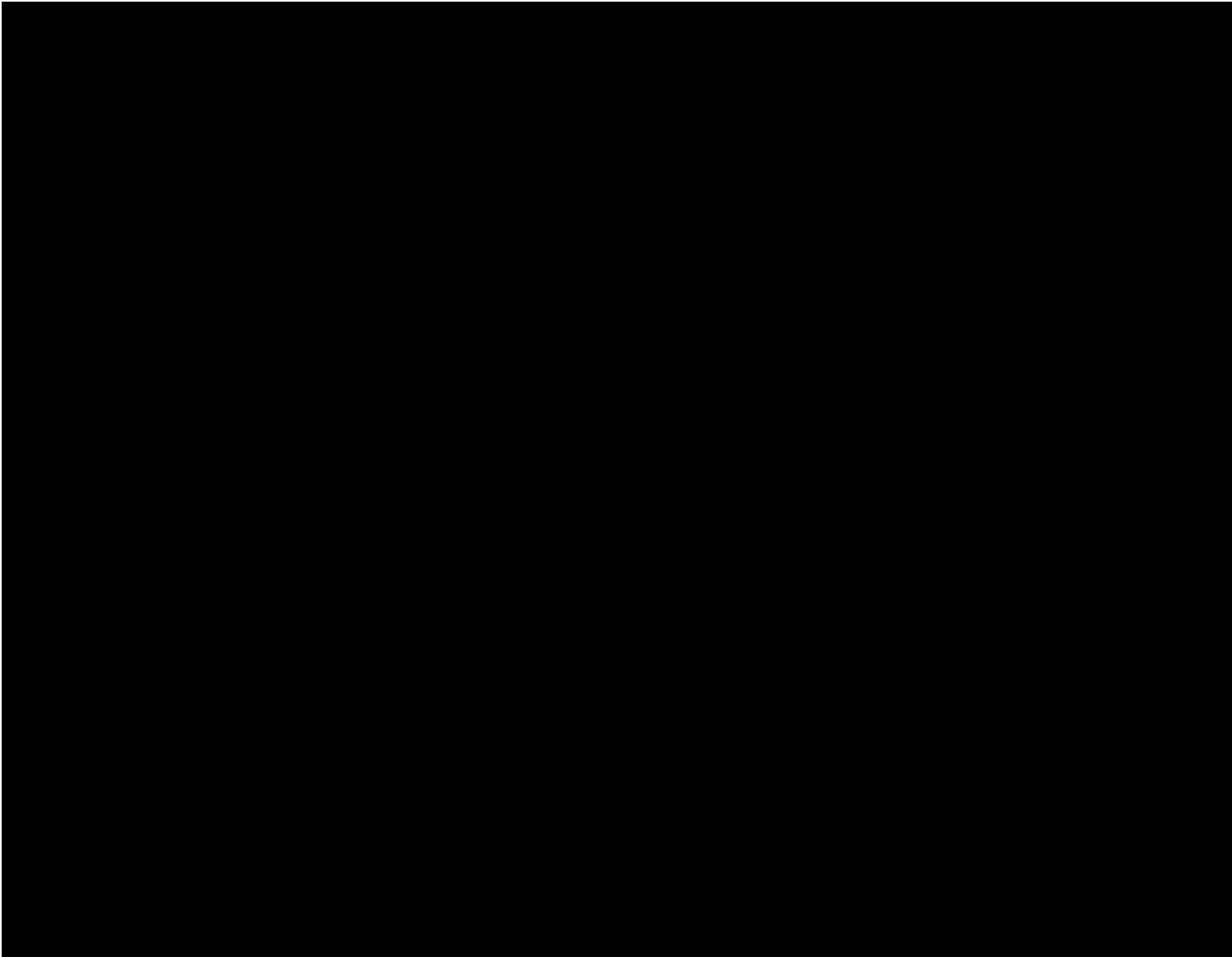
County

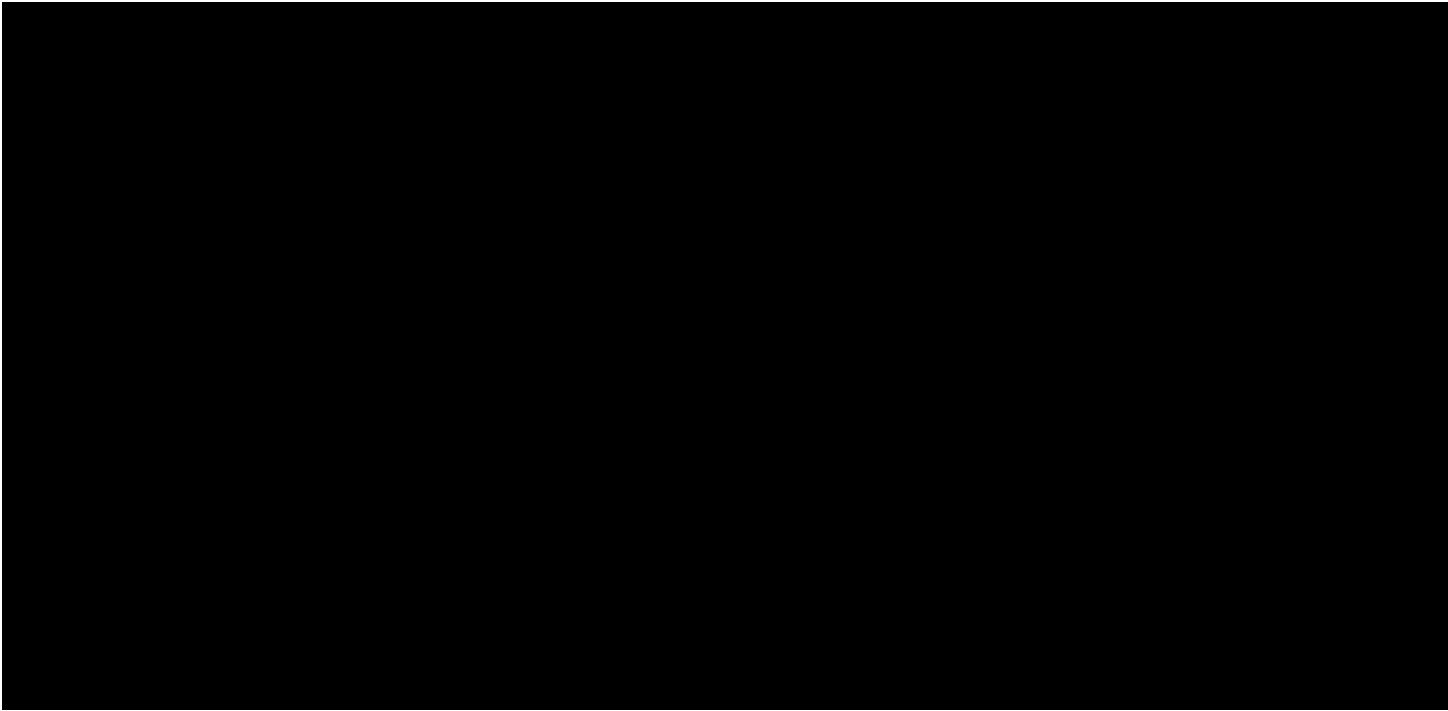
Postcode *

Telephone Number

Email Address *

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Portsmouth
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Part A: Your Representation

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1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Local Plan Policy



Policy *

Strategic Policy PLP31: Flooding



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

☒ Yes
☐ No

2(b) Sound: *

☒ Yes
☐ No

2(c) Complies with the Duty to
Co-operate: *

☒ Yes
☐ No

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

We are very supportive of this policy and the approach within it. We feel that it provides a strong framework to ensure new development in Portsmouth takes account of flood risk now and in the future. For clarification

we would however suggest that the following minor amendments are made.

8.7 When the North Portsea Island scheme is complete it will reduce the risk of tidal flooding to the Eastern Road and A3, but only the sections of those highways that lie within the benefit area to the south of the upgraded flood defences.

8.9 should read 'tidal Flood Zone 3b'

8.16 the word 'assessment' has been omitted

We recognise that a sequential test has been undertaken and included within the evidence base for the local plan. Whilst we feel that the assessment approach is not incorrect, we feel it could be more robust using the hazard mapping that is within the SFRA rather than rely on information relating to the proportion of the sites that are at risk of flooding at the present day relative to the proportion in 2122. This was a comment that we made on an earlier draft of the sequential test document. It is our opinion that this would not alter the outcomes of the sites proposed in the plan and therefore affect soundness but would provide a more robust base for future planning decisions.

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☐ Yes

☒ No

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☐ Please select here if an agent has been appointed for this representation

1. Personal Details

Title

Mrs

Forename *

Laura

Surname *

Lax

Job Title
(where
relevant)

Organisation
(where
relevant)

Environment Agency

Postcode
Look-up

Building Name

Secondary

Name

Street

District

Town

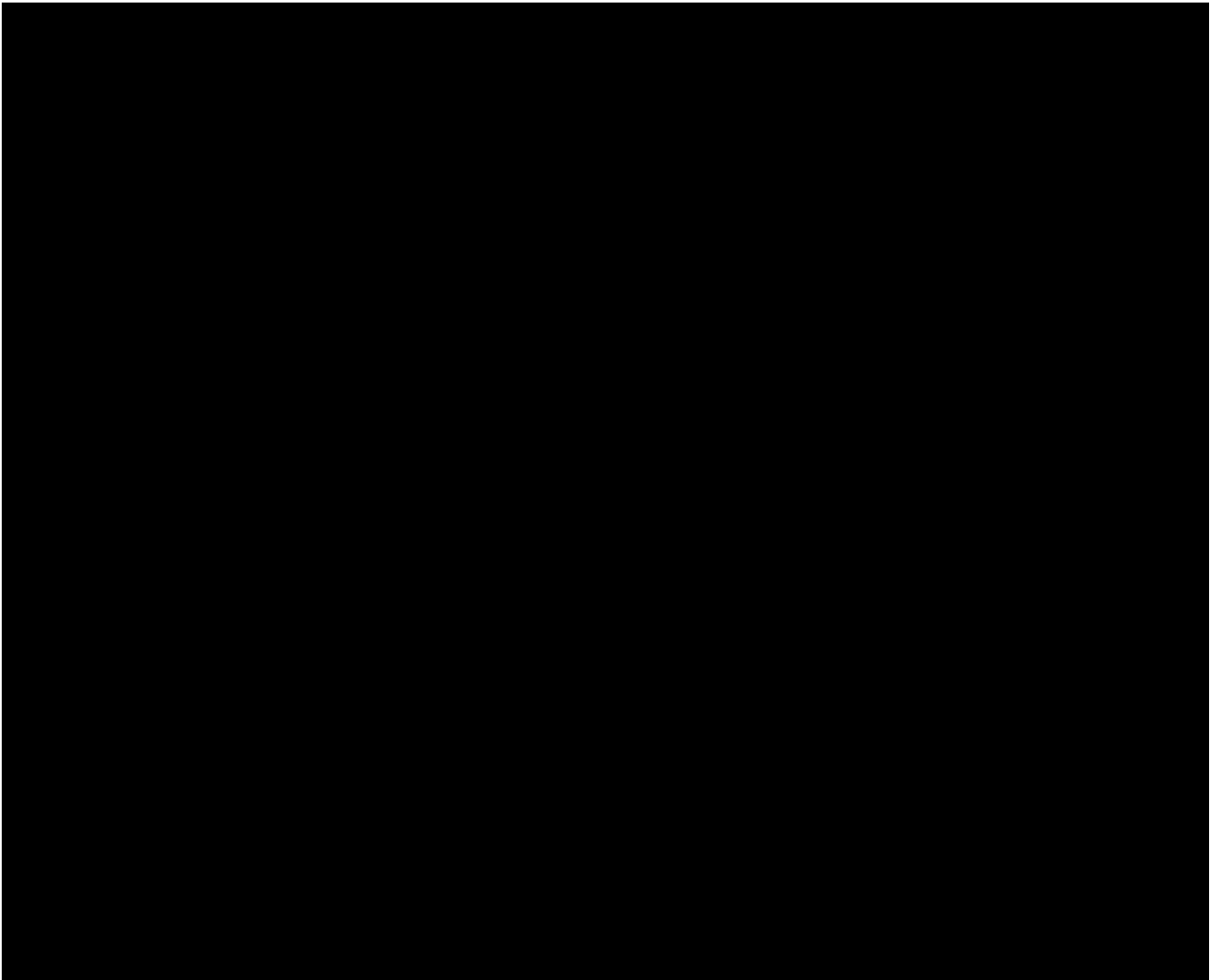
County

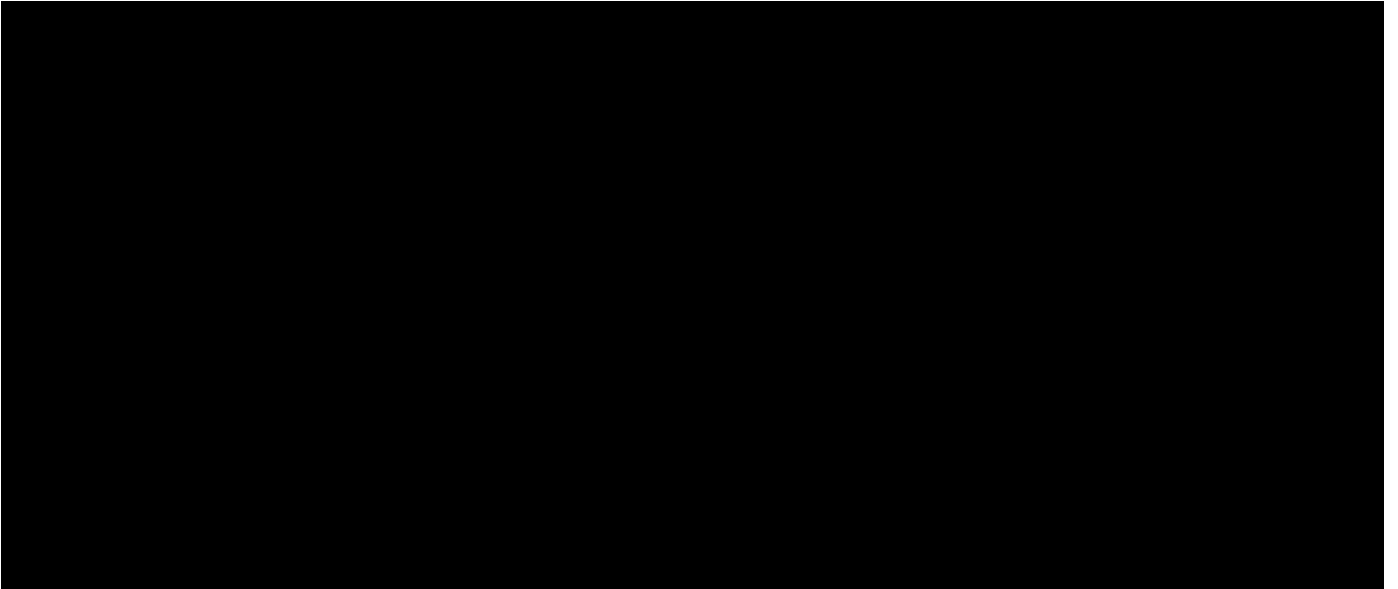
Postcode *

Telephone Number

Email Address *

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Local Plan Policy



Policy *

Development Management Policy PLP37: Contaminated Land



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

☒ Yes
☐ No

2(b) Sound: *

☒ Yes
☐ No

2(c) Complies with the Duty to
Co-operate: *

☒ Yes
☐ No

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

We are supportive of this policy and its intention to ensure that the natural environment is protected.

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- ☐ Yes
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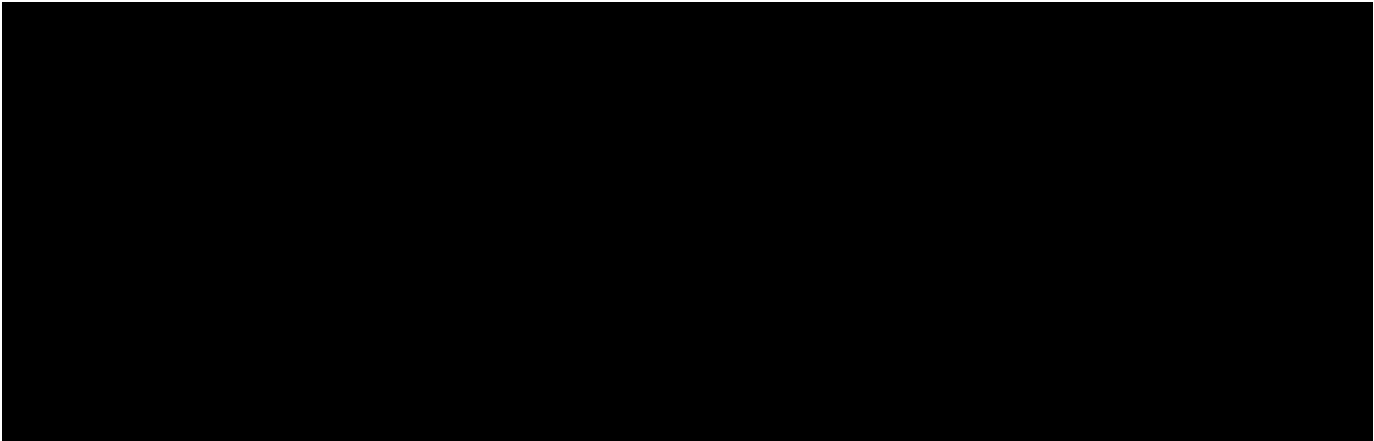
1. Personal Details

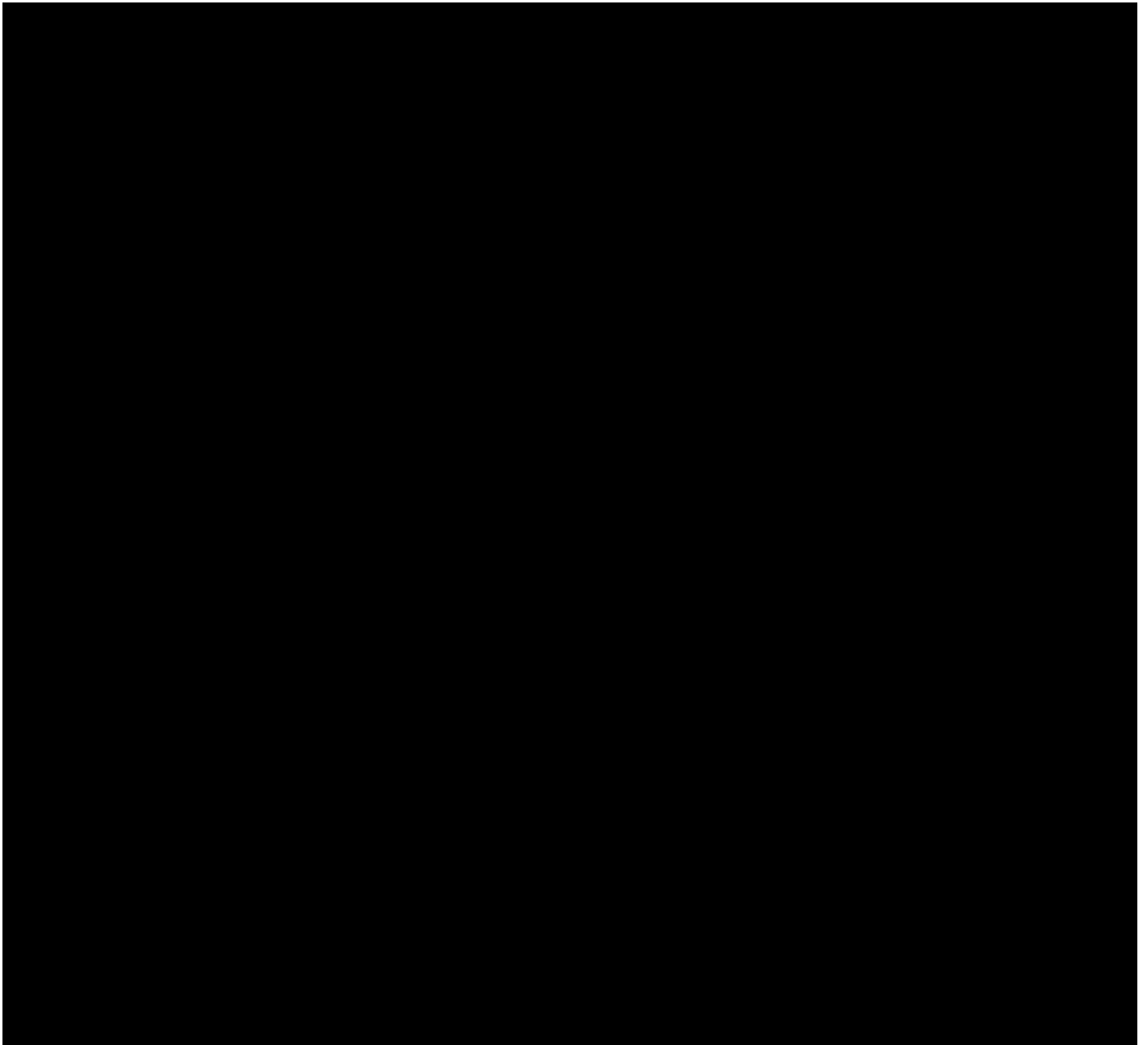
Title

Mrs

Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	
Building Name	
Secondary Name	
Street	Canal Walk
District	
Town	Romsey
County	Hampshire
Postcode *	SO51 7LP
Telephone Number	
Email Address *	

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Local Plan Policy



Policy *

Strategic Policy PLP39: Biodiversity



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

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☒ Yes
☐ No

2(b) Sound: *

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☐ No

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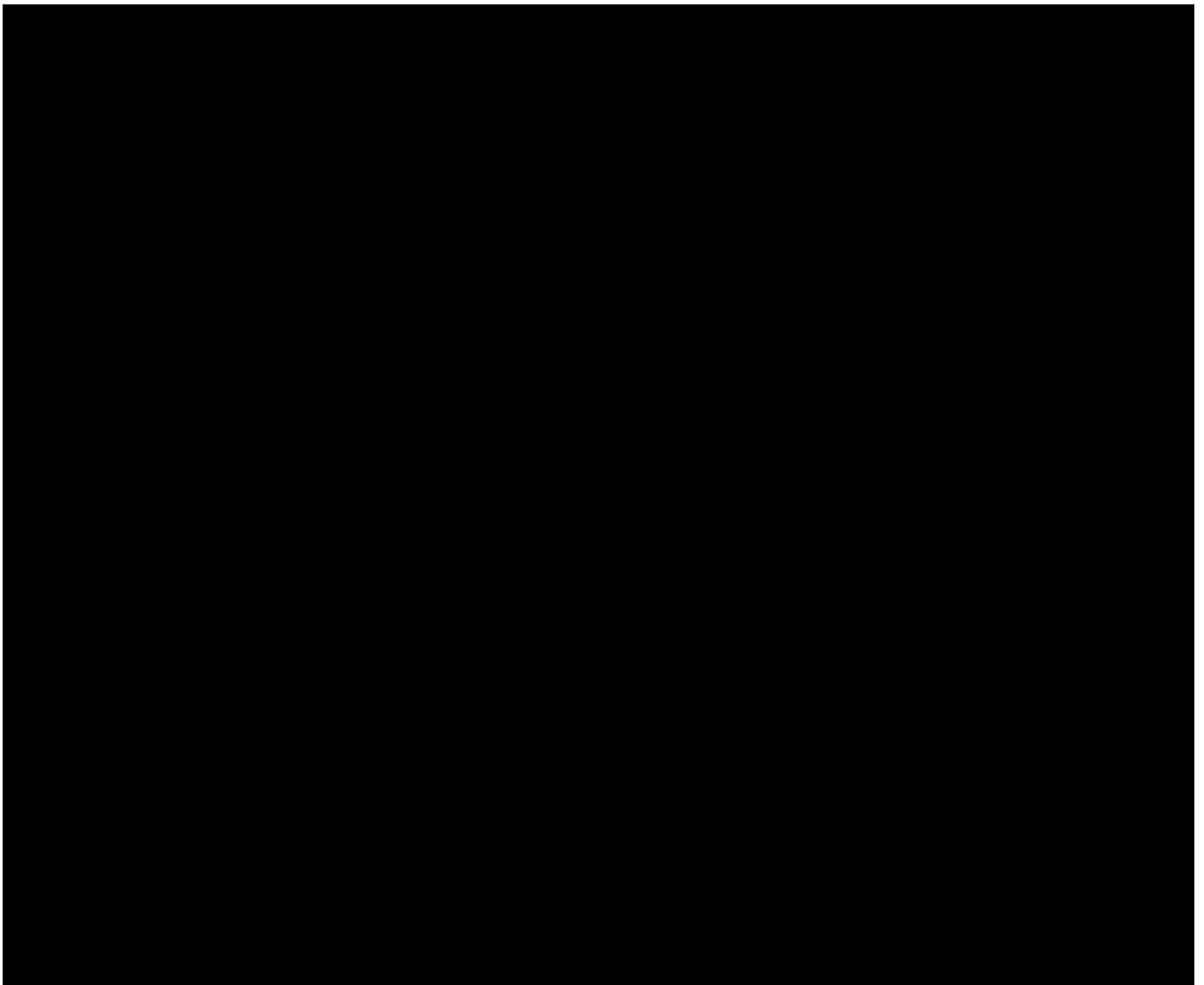
1. Personal Details

Title

Mrs

Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	▼
Building Name	
Secondary Name	
Street	Canal Walk
District	
Town	Romsey
County	Hampshire
Postcode *	SO51 7LP
Telephone Number	
Email Address *	k

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Local Plan Policy



Policy *

Strategic Site Allocation Policy PLP4: Tipner East



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

☒ Yes
☐ No

2(b) Sound: *

☒ Yes
☐ No

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☐ No

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In relation to issues within our remit we have no soundness issues with this proposed allocation however we would suggest the following point is amended to ensure it is factually correct.

Table 4.3 specifies the Environment Agency as being responsible for monitoring delivery of the sea defence wall. This is not within our remit, and this should therefore be amended to state that monitoring should be in line with the planning condition/legal agreement (as in Table 4.2).

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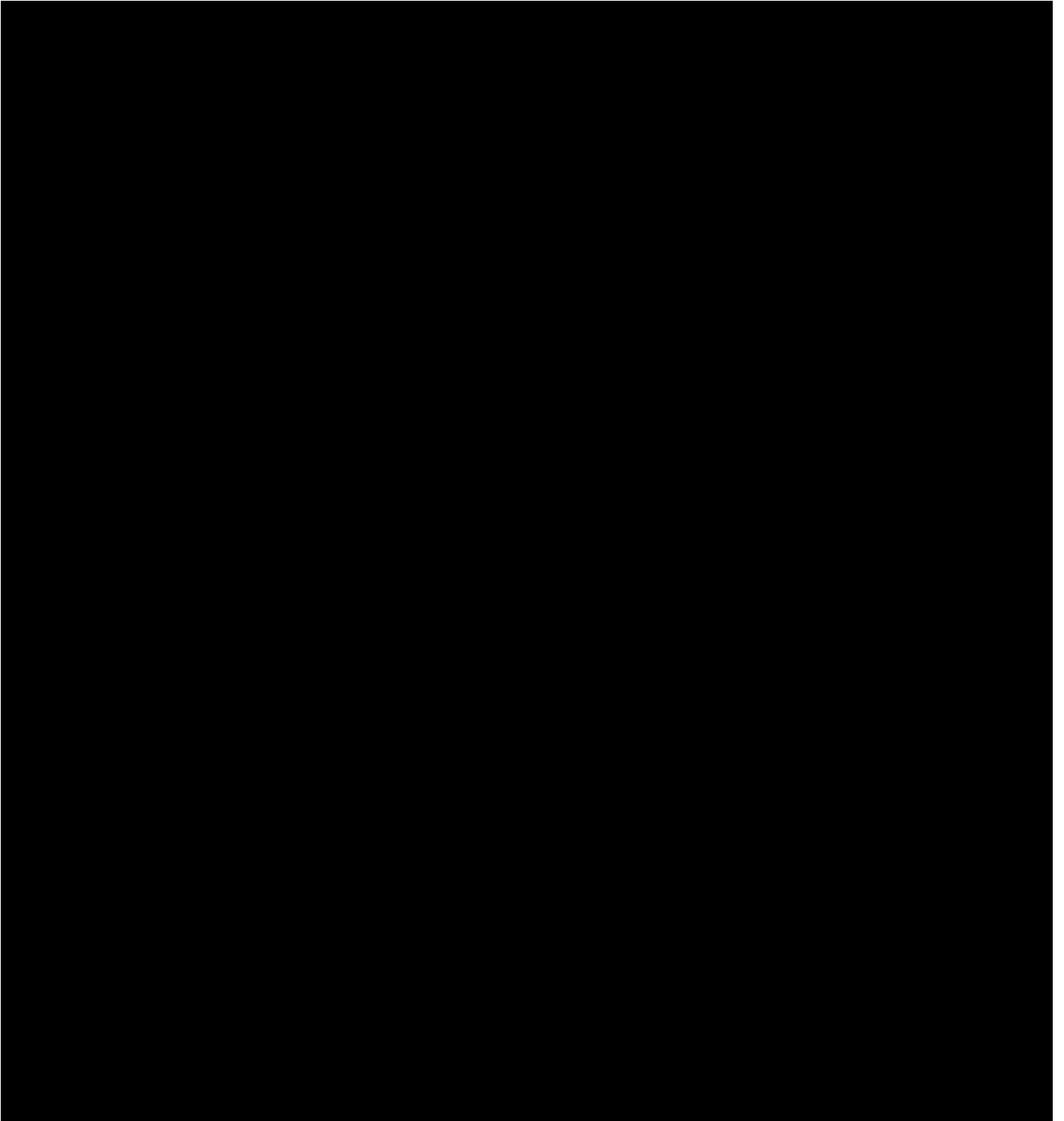
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1. Personal Details

Title	Mrs
Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	
Building Name	
Secondary Name	
Street	Canal Walk
District	
Town	Romsey
County	Hampshire
Postcode *	SO51 7LP
Telephone Number	
Email Address *	

Please note: anonymous or confidential representations cannot be accepted.



* - Compulsory Question.

If you would like a copy of your completed response form, please e-mail the Planning Policy team at policyconsultations@portsmouthcc.gov.uk

Portsmouth Local Plan

Pre-Submission Response Form



Portsmouth
CITY COUNCIL

Portsmouth City Council has prepared a new Local Plan to guide development in the City up to 2040. This response form allows you to provide your views on the Pre-Submission version of the Portsmouth Local Plan (the 'Plan') along with its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment before it is submitted for examination to the Planning Inspectorate.

The consultation is open from 09 July 2024 to 23.59 on 03 September 2024.

Here is a link to the [Portsmouth Local Plan Evidence](#), which includes the Local Plan and other supporting documents.

Please contact the Planning Policy team by email at policyconsultations@portsmouthcc.gov.uk or phone 07990138226 if you have any queries or require this form in an alternative format.

Privacy Notice

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How to complete this form

This form has three parts:

Part A Your Representation(s): fill in and submit a new response form for each representation you wish to make on a specific policy of the Pre-Submission Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment.

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1. 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;
2. Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. 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
4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

Please provide all the supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Part B Personal Details: need only be completed once by each person responding to the consultation. Please provide your name, postal address, email address and any other contact information. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted.

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After this Pre-Submission consultation by the City Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Local Plan Policy



Policy *

Development Management Policy PLP40: Biodiversity Net Gain



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

☒ Yes
☐ No

2(b) Sound: *

☒ Yes
☐ No

2(c) Complies with the Duty to
Co-operate: *

☒ Yes
☐ No

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

We are supportive of this policy and its intention to ensure that the natural environment is protected. It is a positive step towards demonstrating commitment to biodiversity.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? *

☐ Yes

☒ No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B Personal Details:

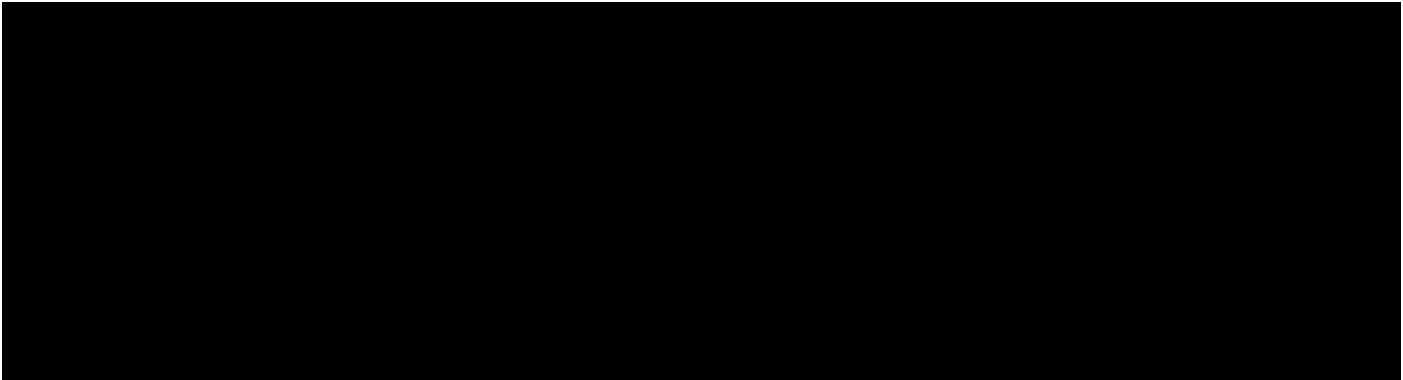
If you are responding on behalf of an organisation, the postal address noted should be that of the organisation.

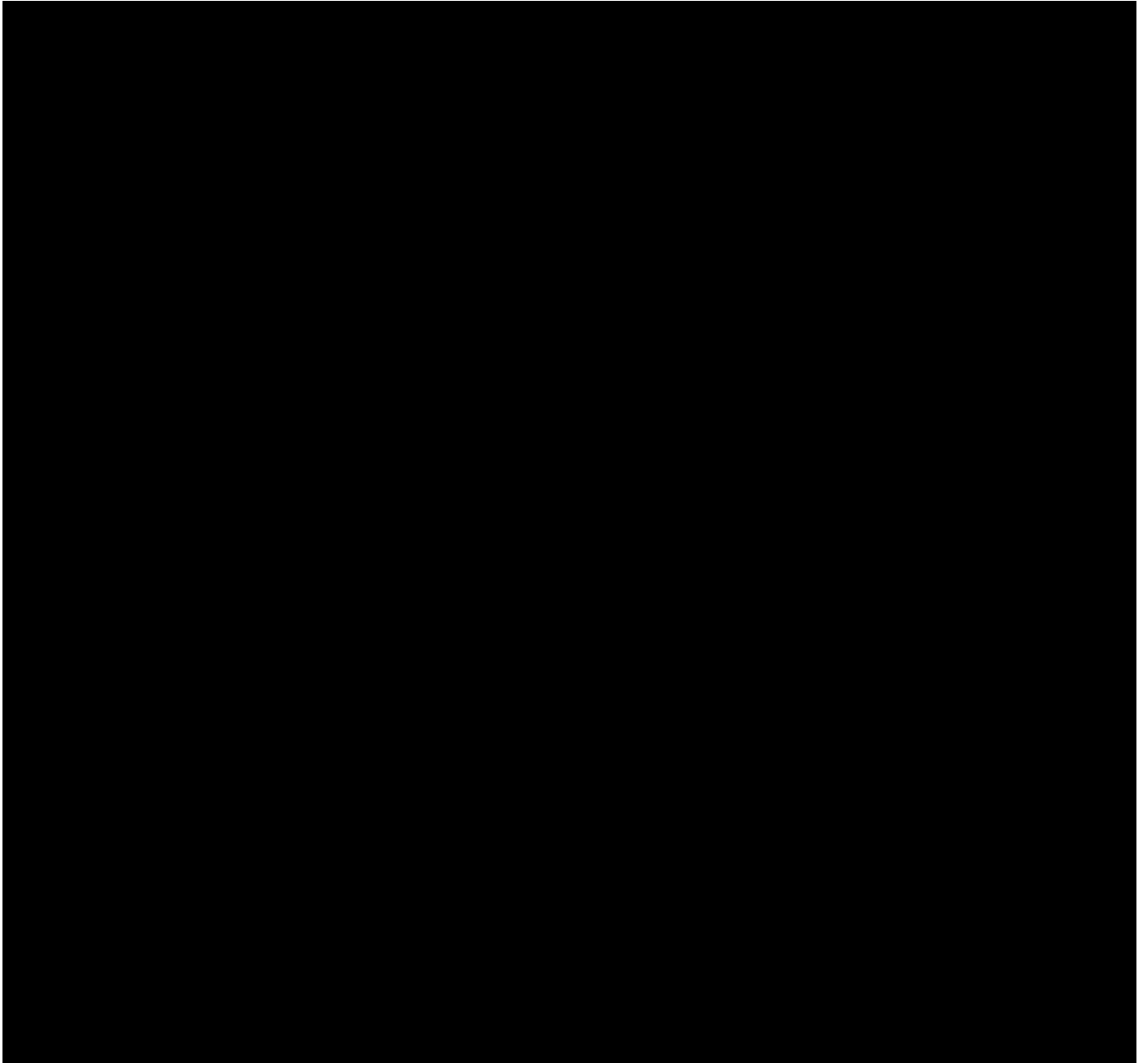
☐ Please select here if an agent has been appointed for this representation

1. Personal Details

Title	Mrs
Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	
Building Name	
Secondary Name	
Street	Canal Walk
District	
Town	Romsey
County	Hampshire
Postcode *	SO51 7LP
Telephone Number	
Email Address *	

Please note: anonymous or confidential representations cannot be accepted.





* - Compulsory Question.

If you would like a copy of your completed response form, please e-mail the Planning Policy team at policyconsultations@portsmouthcc.gov.uk

Portsmouth Local Plan

Pre-Submission Response Form



Portsmouth
CITY COUNCIL

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Here is a link to the [Portsmouth Local Plan Evidence](#), which includes the Local Plan and other supporting documents.

Please contact the Planning Policy team by email at policyconsultations@portsmouthcc.gov.uk or phone 07990138226 if you have any queries or require this form in an alternative format.

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How to complete this form

This form has three parts:

Part A Your Representation(s): fill in and submit a new response form for each representation you wish to make on a specific policy of the Pre-Submission Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment.

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4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

Please provide all the supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Part B Personal Details: need only be completed once by each person responding to the consultation. Please provide your name, postal address, email address and any other contact information. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted.

Part C Diversity Monitoring: is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity and disability. This section only needs to be filled in once. Answering these questions allows the City Council to monitor responses from different groups and understand their views.

After this Pre-Submission consultation by the City Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Habitat Regulations Appraisal Section and/or Paragraph



Section *

Chapter 6 - Appropriate Assessment



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

- ☐ Yes
☒ No

2(b) Sound: *

- ☐ Yes
☒ No

2(c) Complies with the Duty to Co-operate: *

- ☒ Yes
☐ No

3. If you have answered 'no' to any of questions 2(a) to (c) please give details of why you consider this part of the Local Plan or its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is not legally compliant, is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. *

We have concerns regarding the deliverability of the Tipner West and Horsea Island East site especially in relation to biodiversity. Currently we do not feel that the evidence provided demonstrates the allocation

could come forward without damage to the environment, specifically the internationally and nationally designated sites. Our main concern relates to a lack of evidence regarding the availability and delivery of required mitigation/compensation sites.

As well as the local plan document we have reviewed the associated Habitats Regulations Assessment (HRA) which provides assessment for this allocation. The Environment Agency is not the decision maker with regards to the derogation case. However, based on our review of the HRA we do not agree with the conclusion. There is too much uncertainty attached to the evidence that underpins the conclusion.

As described in the HRA text, the policy wording sets out the requirement for the provision of replacement habitat. However, this provides no certainty that the replacement habitat can be found and/or no explanation as to the lead-in time required to ensure any replacement habitat is of a suitable quality and functioning before the loss occurs. Paragraph 6.33 of the HRA highlights that parcels of land have been identified as potential mitigation/compensation. In the absence of this information being shared, the validity of the statement cannot be supported.

The Regional Habitat Creation Programme, now referred to as the Habitat Compensation and Restoration Programme addresses coastal squeeze losses resulting from the hold the line policy of the North Solent SMP. However, any losses over and above what was included at the SMP stage e.g., resulting from increasing the size of flood defence, encroachment into the intertidal must be addressed. This has not been addressed in the HRA.

Whilst we acknowledge the continued engagement regarding this site through the Regulatory Panel, we are concerned that the HRA fails to reflect or highlight concerns and issues that have been raised at the Regulatory Steering Group meetings. It is acknowledged in paragraph 8.138 of the HRA that some panel members have raised concerns and questioned the value of continued use of the bespoke metric however in the absence of any detail of the sites identified as potential compensation, we are very sceptical of 400ha figure. This has been flagged at the Regulatory Panel meetings. We do not therefore support the level of confidence that has been assigned in the assessment to finding compensatory habitat.

In conclusion we do not feel that the evidence provided at this time to support this allocation is robust. Too much uncertainty remains regarding the deliverability of compensation/mitigation.

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

It is our opinion that the duty to cooperate has been met through the Regulatory Panel meetings and ongoing dialogue in association with this.

4. If you have answered 'no' to any of questions 2(a) to (c) please set out the modification(s) you consider necessary to make the Portsmouth Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at question 3 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. *

Further evidence is required to demonstrate that the mitigation/compensation is available and deliverable.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? *

- ☐ Yes
- ☒ No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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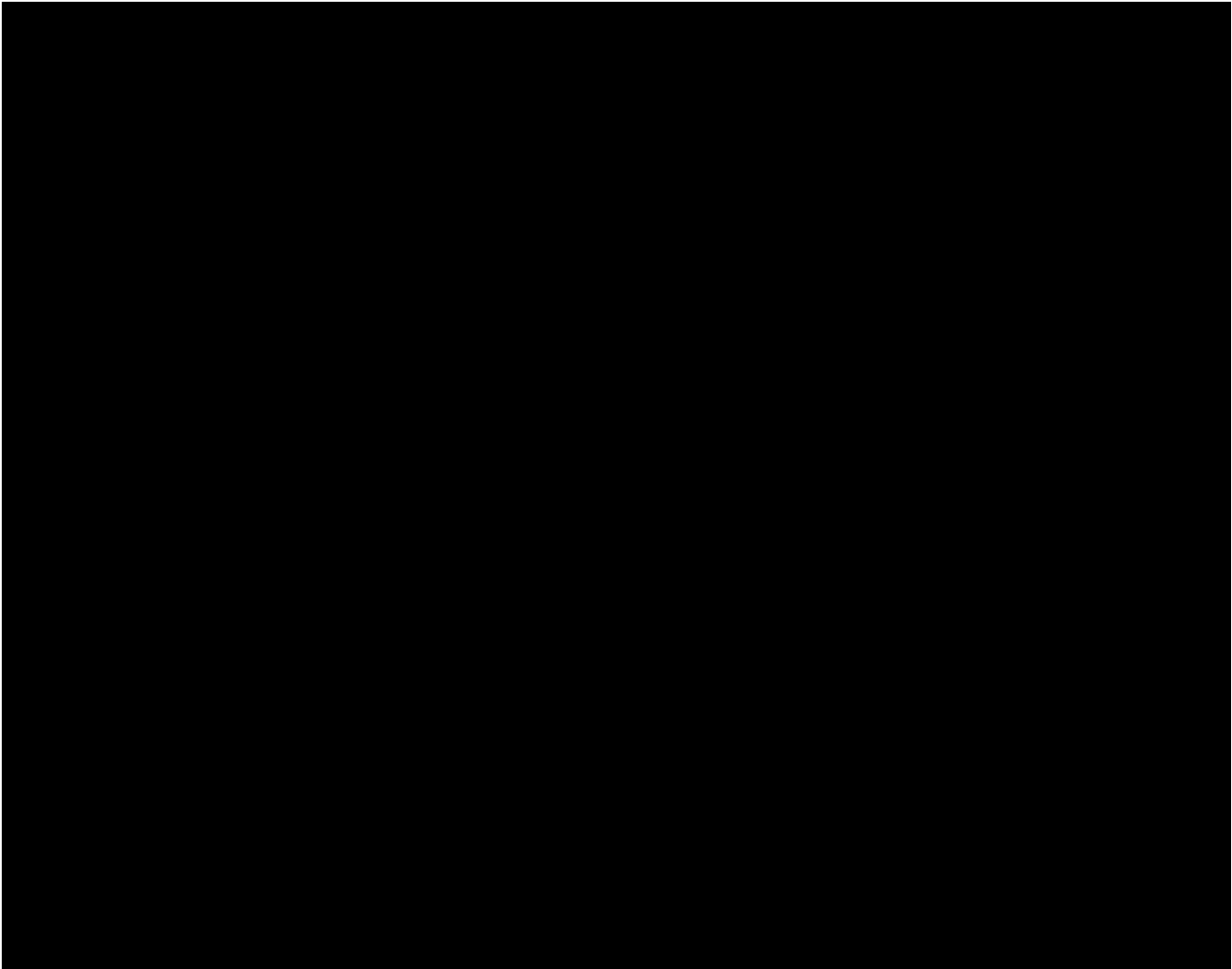
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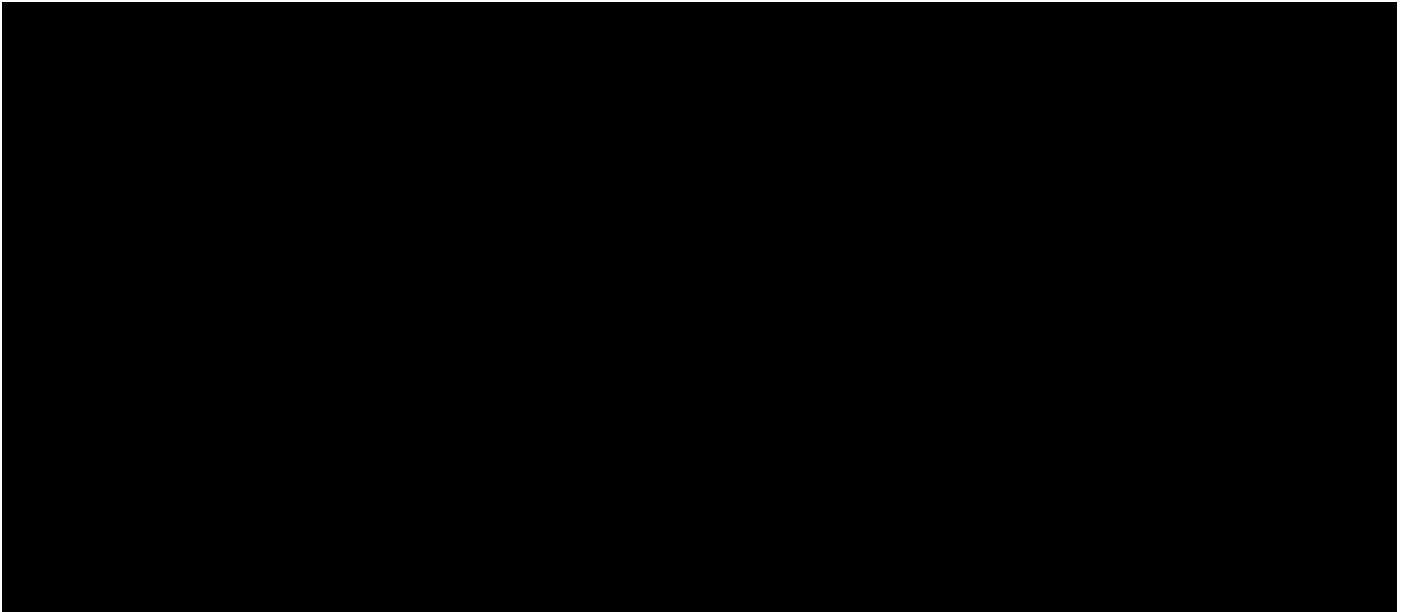
1. Personal Details

Title	Mrs
Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	
Building Name	

Secondary Name	
Street	Canal Walk
District	
Town	Romsey
County	Hampshire
Postcode *	SO51 7LP
Telephone Number	
Email Address *	k

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CITY COUNCIL

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Part C Diversity Monitoring: is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity and disability. This section only needs to be filled in once. Answering these questions allows the City Council to monitor responses from different groups and understand their views.

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Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Local Plan Policy



Policy *

Site Allocation Policy PLP11: Port Solent



2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: *

☒ Yes
☐ No

2(b) Sound: *

☒ Yes
☐ No

2(c) Complies with the Duty to
Co-operate: *

☒ Yes
☐ No

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

In relation to issues within our remit we have no soundness issues with this proposed allocation however we would provide the following comments to clarify our position.

The Level 2 SFRA identifies that the provision of safe access and egress could be challenging for this allocation, and there is a chance that voluntary and free movement of people during the design event may not be deliverable. However, we are satisfied that the Level 1 & 2 SFRA adequately assesses and identifies the potential risks, and that Portsmouth City Council planners, in conjunction with their emergency planners, have used this information along with our technical advice when considering the inclusion of this allocation within the Plan. Further, more detailed, site specific Flood Risk Assessment requirements are also clear. The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. We do not therefore find this allocation unsound, however Portsmouth City Council should be confident that the movement of people can be safely managed prior to, and during, a flood.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? *

- ☐ Yes
☒ No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B Personal Details:

If you are responding on behalf of an organisation, the postal address noted should be that of the organisation.

☐ Please select here if an agent has been appointed for this representation

1. Personal Details

Title	Mrs
Forename *	Laura
Surname *	Lax
Job Title (where relevant)	
Organisation (where relevant)	Environment Agency
Postcode Look-up	
Building Name	
Secondary Name	
Street	Canal Walk
District	
Town	Romsey

County

Hampshire

Postcode *

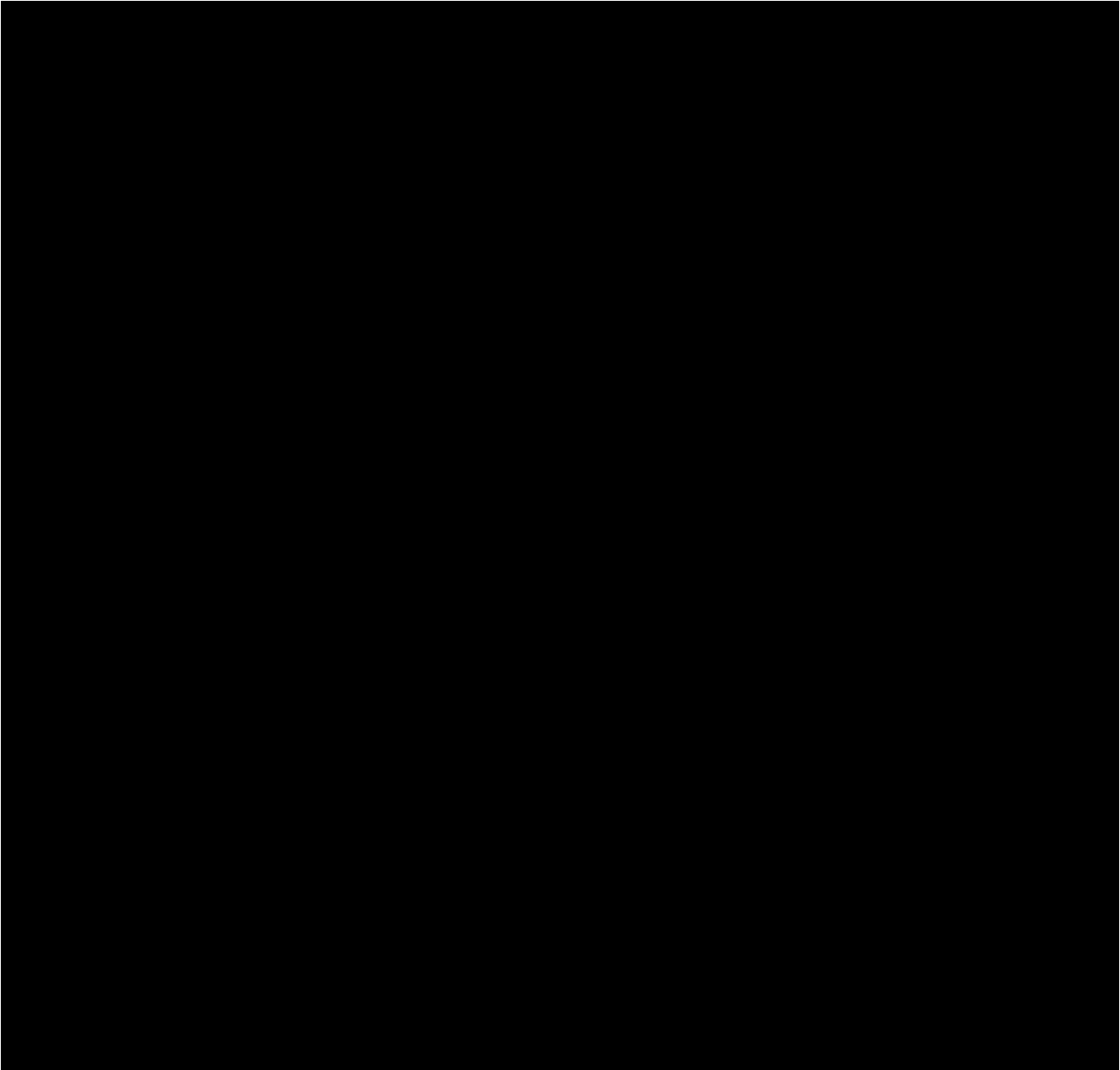
SO51 7LP

Telephone Number

Email Address *

uk

Please note: anonymous or confidential representations cannot be accepted.



* - Compulsory Question.

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Appendix 2: EA Representation on the Pre-Submission Local Plan Addendum 2025

Portsmouth Local Plan Addendum 2025 Response Form

Portsmouth City Council is preparing a new Local Plan to guide development in the City up to 2040. This response form allows you to provide your view on the Pre-Submission Portsmouth Local Plan Addendum 2025 (the 'Local Plan Addendum') along with extracts of its Policies Map, the Sustainability Appraisal and the Habitat Regulations Assessment before the whole Local Plan, including its Addendum, is submitted for examination to the Planning Inspectorate.

The consultation is open from 18 November 2025 to 23.59 on 08 January 2026.

Here is a link to the [Portsmouth Local Plan Evidence](#), which includes the Portsmouth Local Plan Addendum and other supporting documents.

Please contact the Planning Policy team by email at policyconsultations@portsmouthcc.gov.uk or phone 07990138226 if you have any queries or require this form in an alternative format.

Privacy Notice

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The consultation (including the processing and storing of data) uses software supplied by Evolutive for Portsmouth City Council (as the Data Controller). For full details of how Evolutive complies with the UK GDPR, please see their website and private notice ([Evolutive Website](#)).

Your comments on the Portsmouth Local Plan Addendum will be analysed by officers at the Council who will also make use of Consult AI, which is a secure analysis platform provided by The Future Fox.

The Future Fox processes consultation data securely on behalf of the Council for the sole purpose of analysing and reporting consultation responses. AI services, such as OpenAI and Microsoft, are used to generate summaries and insights from the feedback. The data shared with these services is never used to train AI models and not stored by them.

Explicit personal data (such as your name, address, or contact details) is never shared with any third-parties, including these AI services. Some feedback may contain implicit personal data, for example, details within comments that could indirectly identify someone such as "my house backs onto the park". Where this occurs, it is minimised through redaction by the Council and processed under strict contractual and data-protection safeguards.

You can find out more about how The Future Fox protects your data here:

- [Privacy Policy](#)
- [Responsible AI Policy](#)

How to complete this form

This form has three parts

Part A Your Representation(s): fill in and submit a response form that includes all representation(s) you wish to make on a specific policy of the Pre-Submission Portsmouth Local Plan Addendum 2025, specific extracts of its Policies Map, Sustainability Appraisal and/or Habitat Regulations Assessment.

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4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

Representations should only be made on matters that are included in the Local Plan Addendum 2025. Any representations that are received in this consultation that do not relate to any policies in the Local Plan Addendum 2025 will not be summarised by officers, but they will be passed on to the Inspector.

All representations that were duly made in either the 2024 or 2025 Pre-Submission consultations will be sent to the Local Plan Inspector.

Policies that are not in the Addendum remain unaltered by the Addendum and are not subject to further Pre-Submission consultation.

Please provide all the supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Part B Personal Details: need only be completed once by each person responding to the consultation. Please provide your name, postal address, email address and any other contact information. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted.

Part C Diversity Monitoring: is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity, and disability. This section only needs to be filled in once. Answering these questions allows the Council to monitor responses from different groups and understand their views.

After this Pre-Submission consultation by the Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please select below which part of the Local Plan Addendum, extracts of its Policies Map, Sustainability Appraisal and/or Habitat Regulations Assessment your representation(s) relates to: *

Local Plan Addendum Policy

Local Plan Addendum Policy:*

Policy PLP3: Tipner West

2. Do you consider this part of the Local Plan Addendum, extracts of its Policies Map, Sustainability Appraisal or Habitat Regulations Assessment is:

2(a) Legally Compliant:*

- ☒ Yes
☐ No

2(b) Sound:*

- ☒ Yes
☐ No

2(c) Complies with the Duty to Co-operate:*

- ☒ Yes
☐ No

3. If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan Addendum or its compliance with the Duty to Co-operate. Please be as precise as possible:*

It is our opinion, considering elements within our remit, that the Portsmouth Local Plan addendum meets the tests above. The revised policy which has removed the need for reclamation reduces the impact on the Environment. We feel that the policy as drafted now provides a sound basis on which to provide a sustainable development through which environmental enhancement, can be realised.

Please Note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- ☐ Yes
☒ No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please Note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B: Personal Details

If you are responding on behalf of an organisation, the postal address noted should be that of the organisation.

☐ Please select here if an agent has been appointed for this representation

Personal Details

Title:

Mrs

Forename(s):*

Laura

Surname:*

Lax

Company Name:

Environment Agency

(where relevant)

Address

Postcode Look Up:

Canal Walk, Romsey, Hampshire, SO51 7LP

Building Name:

Environment Agency

Secondary Name:

Street:

Canal Walk

Town:

Romsey

County:

Hampshire

Postcode: *

SO51 7LP

