

Consistency with National Policy Topic Paper

Supporting the emerging Portsmouth Local Plan

November 2025

(minor update February 2026)



Portsmouth
CITY COUNCIL

Executive Summary

- This Topic Paper has been prepared to support the emerging Portsmouth Local Plan, which is scheduled for submission in March 2026.
- The purpose of this Topic Paper is to set out succinctly how the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 is consistent with the latest national policy namely the National Planning Policy Framework published in December 2024, thus enabling the delivery of sustainable development in accordance with national planning policy.
- The Topic Paper references recent changes in national planning guidance where relevant.
- It does not seek to explore in detail any Local Plan policies or any evidence base supporting them.

Contents

Chapters:

1. Introduction.....	1
2. The preparation of the emerging Portsmouth Local Plan in relation to changes in national policies.....	4
3. Pre-Submission Local Plan Addendum 2025.....	6
Delivering a sufficient supply of homes.....	6
Building a strong, competitive economy.....	7
Maintaining effective cooperation.....	7
4. Pre-Submission Local Plan 2024.....	9
Delivering a sufficient supply of homes.....	9
Promoting healthy and safe communities.....	10
Promoting sustainable transport.....	11
Achieving well-designed places.....	12
Meeting the challenge of climate change, flooding and coastal change.....	12
5. Conclusion.....	14

Appendices:

1. Consistency of the Pre-Submission Local Plan Addendum 2025 with the NPPF and other relevant Government guidance.....	15
2. Consistency of the Pre-Submission Local Plan 2024 and its draft Schedule of Changes with the NPPF and other relevant Government guidance.....	16

1. Introduction

- 1.1 Consistency with national policy is one of the four tests of soundness against which Local Plans are assessed. The purpose of this Topic Paper is to set out succinctly how the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 (hereafter referred to in combination as the Portsmouth Local Plan (PLP)) are consistent with national policy, thus enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework¹ (NPPF) and other statements of national planning policy where relevant. The PLP will be submitted for examination in spring 2026 and is consistent with the latest version of the NPPF, which was published in December 2024.
- 1.2 The majority of this Topic Paper, therefore, relates to the December 2024 NPPF, and where references are made to the NPPF it should be taken as referring to the December 2024 version, unless otherwise specified.
- 1.3 This Topic Paper primarily looks at recent changes made to national policy and how the PLP is consistent with those; it does not look at consistency with the NPPF as a whole. This is because the premise of this document is that prior to December 2024, the PLP was consistent with the 2023 NPPF and other national policy.
- 1.4 The emerging PLP has been prepared over a number of years and will, by the time of submission, have been consulted on four times under Regulation 18 and twice under Regulation 19. This paper briefly explains the preparation of the PLP in regards to changing national policy and other national changes such as the Standard Method for assessing housing need. There have been numerous changes to national planning policy in recent years, and this paper explains how they have impacted the preparation of the PLP.
- 1.5 The Topic Paper firstly demonstrates how the Pre-Submission Local Plan Addendum 2025² is consistent with the 2024 NPPF and other national guidance and policies, with references to specific documents also listed in Appendix 1. The Topic Paper then demonstrates how the Pre-Submission Local Plan 2024³ is consistent with the 2024 NPPF and signposts relevant extracts from the draft Schedule of Changes, which will be submitted for examination alongside the Local Plan. References to specific documents are listed in Appendix 2.
- 1.6 The emerging PLP is supported by a robust and proportionate evidence base. This is published on the City Council's website in the Core Document Library⁴. A number of the documents have been prepared iteratively, and previous versions are still

¹ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

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

³ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

⁴ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

available to view in the archive⁵. The key documents referenced in this Topic Paper are:

- Sustainability Appraisal (SA) Update (2025)⁶
- Habitat Regulations Assessment (HRA)⁷
- Duty to Cooperate Statement⁸
- Housing and Economic Needs Assessment (HEDNA)⁹ and its Update¹⁰
- Housing and Economic Land Availability Assessment (HELAA)¹¹
- Development Viability Assessment¹²
- North Solent Shoreline Management Plan (NSSMP)¹³
- Strategic Flood Risk Assessment 1 (SFRA 1)¹⁴
- Strategic Flood Risk Assessment 2 (SFRA 2)¹⁵ and Update¹⁶
- Interim Infrastructure Delivery Plan (IDP)¹⁷
- Strategic Transport Assessment (STA)¹⁸ and Update¹⁹

1.7 It should be noted that this Topic Paper has been prepared in November 2025, with a minor update in February 2026, and is correct and up to date as of that time. There will inevitably be further national changes and updates to this Paper will be prepared as considered necessary by the City Council.

⁵ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/local-plan-archive/>

⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

⁸ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/duty-to-cooperate/>

⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

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

¹¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/HELAA-2025.pdf>

¹² https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PCC-Development-Viability-Assessment-Update_2024.pdf

¹³ <https://www.northsolentsmp.co.uk/>

¹⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/05/SFRA-Part-1-Main-Report-V6.pdf>

¹⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/PCC-Level-2-SFRA_Version-4-Final.pdf

¹⁶ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/climate-emergency/>

¹⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/FINAL-IDP-2025-version-November-2025-v1.pdf>

¹⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/Portsmouth-Local-Plan_Strategic-Transport-Assessment-Final-060225.pdf

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

1.8 A consultation²⁰ seeking views on a revised version of the NPPF was published in December 2025²¹. The new draft policies are at the time of writing (February 2026) in draft form and so have not been taken into account in the formulation of the emerging PLP.

²⁰

https://assets.publishing.service.gov.uk/media/697b6bc6aacd0dc9777b4fd2/December_2025_NPPF_Consultation.pdf

²¹

https://assets.publishing.service.gov.uk/media/697b71c52ff8d10a830d5d4a/Draft_NPPF_December_2025.pdf

2. The preparation of the emerging Portsmouth Local Plan in relation to changes in national policy

- 2.1 The original Pre-Submission Portsmouth Local Plan 2024²² was published for consultation in summer 2024, with an anticipated date for submission of 03 March 2025. The Pre-Submission Local Plan 2024 was prepared in accordance with the 2023 version of the NPPF as that was the national policy in place at the time. When the new NPPF was published in December 2024, transitional arrangements allowed Local Plans already in preparation to still be submitted under the 2023 NPPF providing this was done before 12 March 2025.
- 2.2 In April 2025, the City Council decided not to submit the Pre-Submission Portsmouth Local Plan 2024 in March 2025. This decision was made following the first IROPI (Imperative Reasons of Overriding Public Interest) Opinion provided by Government in February 2025, regarding the emerging allocation of Tipner West. The Council decided that changes needed to be made to the emerging Local Plan before submitting so that the proposals did not result in adverse impacts on international conservation designations that could not be mitigated. The timing of the first IROPI Opinion meant that it was not possible to submit the Local Plan by the 12 March 2025 deadline and that the emerging PLP therefore, needed to be consistent with the 2024 NPPF rather than the 2023 NPPF.
- 2.3 Planning Practice Guidance (PPG) Paragraph: 054 Reference ID: 61-054-20190315 states that when local planning authorities wish to make changes to the publication version of the plan before it is submitted for examination: *'The local planning authority can include any changes in an addendum to the plan. Where the local planning authority intend the changes to be treated as part of the submitted plan, the addendum, together with any necessary sustainability appraisal of it, should be subject to further consultation (equivalent to the consultation on the publication version) before submission.'* In line with the PPG, Portsmouth City Council decided to prepare an addendum to the Local Plan. Whilst the decision to prepare the Addendum was not primarily related to changes in national policy, it did provide the opportunity to address some of those changes. Where resulting changes were substantial, they were included in the Pre-Submission Local Plan Addendum 2025. Where the changes were only minor, they were proposed in a draft Schedule of Changes to the Pre-Submission Local Plan 2024.
- 2.4 The consultation on the Pre-Submission Local Plan Addendum 2025 will take place in winter 2025. The City Council intends to submit the Local Plan and its Addendum to the Planning Inspectorate for examination in spring 2026.
- 2.5 Annex 1 of the NPPF deals with its implementation. Paragraph 237 of the NPPF states that Local Plans that reach Pre-Submission before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, that is by 12 June 2026. The consultation on the Pre-Submission Local Plan 2024 took place in summer 2024, that is, before 12 March 2025. The Local Development Scheme states that the PLP will be submitted in spring 2026. The submission of the PLP in spring 2026 is before 12 June 2026 and so is consistent with paragraph 237 of the NPPF.

²² <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

- 2.6 The Pre-Submission Local Plan Addendum 2025 contains eight new policies. They replace the emerging policies, including introductions and supporting text, from the Pre-Submission Local Plan 2024 in their entirety. All eight policies in the Addendum and associated evidence based studies were prepared in line with the 2024 NPPF. The two City-wide policies in the Addendum are PLP16: Housing Target and PLP25: Employment Target. These are both evidenced by a new Housing and Economic Land Availability Assessment (HELAA) and an Addendum to the Housing and Economic Development Needs Assessment (HEDNA). An overview of the changes in national policy that are relevant to the Pre-Submission Local Plan Addendum 2025 is set out in chapter 3 of this document and the relevant documents are listed in the table forming Appendix 1.
- 2.7 A full review of the Pre-Submission Local Plan 2024 was made to ensure that it complies with the 2024 NPPF and minor changes have been added to a draft Schedule of Changes to ensure consistency. This will be submitted alongside the Local Plan and its Addendum for examination. An overview of the changes in national policy that are relevant to the Pre-Submission Local Plan 2024 is set out in chapter 4 of this document and the relevant documents are listed in the table forming Appendix 2.
- 2.8 The Pre-Submission Local Plan Addendum 2025 and Pre-Submission Local Plan 2024, with some proposed minor amendments, are both consistent with current national policy.

3. Pre-Submission Local Plan Addendum 2025

Introduction

3.1 This chapter of the Topic Paper looks at the key changes in national policy brought in by the 2024 NPPF that the new policies in the Pre-Submission Local Plan Addendum 2025 and their evidence based studies need to be consistent with. The key changes relevant to the Pre-Submission Local Plan Addendum 2025 relate to: housing, economic development and the Duty to Cooperate. The two City-wide policies in the Addendum are PLP15: Housing Target and PLP25: Employment Target. The table forming Appendix 1 references the relevant paragraphs of the NPPF which represent changes in national policy compared to the 2023 NPPF, along with the relevant paragraph of the Local Plan Addendum 2025 which demonstrates consistency with it, and any supporting evidence based studies. Further detail on these matters and consistency with national policy is set out in more detail in the Housing Background Paper²³, the Thriving Economy Topic Paper²⁴ and the Duty to Cooperate Statement²⁵.

Delivering a sufficient supply of homes (chapter 5 of NPPF)

3.2 Paragraph 61 of the NPPF states that the overall aim of a Local Plan should be to meet an area's identified housing need. This is a change from paragraph 61 of the 2023 NPPF, which required a Local Plan to meet 'as much of an area's identified housing need as possible.'

3.3 The development strategy for the Portsmouth Local Plan is carried forward unchanged into the Pre-Submission Local Plan Addendum 2025. It is ambitious and seeks to maximise the potential of developable sites focusing on strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design. In order to ensure no stone was left unturned in delivering the development strategy, and to be consistent with national policy, there was a fresh Call for Sites in spring 2025 feeding into a new Housing and Economic Land Availability Assessment (HELAA). The housing target of 11,369 net additional homes set in Policy PLP16 makes no change to the approach to delivering housing in that it continues to be capacity based, taking account of the City's constrained island geography, but has been updated to reflect the findings of the latest HELAA (2025), and the passage of time since the Pre-Submission Local Plan 2024 was prepared. Appendices 2 and 3 of the Pre-Submission Local Plan Addendum 2025 have also been prepared to reflect the latest HELAA (2025).

3.4 Paragraph 62 of the NPPF states that the minimum number of homes needed should be informed by a local housing need assessment, conducted using the Standard Method set out in national planning guidance. This is a change from the 2023 NPPF, which said that the outcome of the standard method was an 'advisory starting point' for establishing a housing requirement. The 2023 NPPF also allowed an alternative

²³ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Housing-Background-Paper-2025.pdf>

²⁴ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/thriving-economy/>

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

approach (exceptional circumstances) to be taken when calculating housing need. The potential for exceptional circumstances was considered in the 2023 HEDNA and found not to apply in Portsmouth so was not used in the preparation of the Pre-Submission Local Plan 2024.

3.5 The HEDNA Update (2025) represents the local housing need assessment for Portsmouth, which sets out the Standard Method figure of 1,019 dwellings per annum, which equates to 15,285 dwellings over the Plan period of 2025-2040. This is based on the new stock-based Standard Method for calculating housing need. It is an increase of 120 dwellings per annum from the figure of 899 dwellings per annum calculated using the former, population-based standard method in the earlier HEDNA (2023) which had informed the Pre-Submission Local Plan 2024.

3.6 Paragraph 78 of the NPPF makes some changes to the way the buffer is applied to housing land supply calculations. The Housing Background Paper explains the overall approach taken to housing policy with reference to the latest evidence, including how the buffer has been dealt with.

Building a strong, competitive economy (chapter 6 of NPPF)

3.7 Paragraph 86 of the NPPF states that planning policies should pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. This adds additional detail compared to the 2023 NPPF. This is addressed in chapter 8 of the HEDNA Update. It states that Lakeside already hosts a data centre offering co-location and cloud solutions. Lakeside is proposed for allocation for 50,000 m² of new office floorspace in the Pre-Submission Local Plan 2024 under policy PLP5: Lakeside North Harbour, which could accommodate further needs of the digital economy. Gigafactories would be typically of too large a scale to accommodate in Portsmouth. Laboratories would be expected to come forward through ad hoc applications if required. The needs of freight and logistics have been considered under the broader banner of industrial and warehousing demand.

3.8 The evidence base on employment supply was updated through the HELAA (2025) following a fresh Call for Sites. The employment target of 138,746 m² of new employment floorspace in policy PLP25: Employment Target reflects the findings from the latest HELAA, and continues to be capacity-based, taking account of the City's constrained island geography. An oversupply of offices will help meet unmet need in the neighbouring borough of Havant. The Thriving Economy Topic Paper explains the overall approach to economic development.

Maintaining effective cooperation (chapter 3 of NPPF)

3.9 Some changes were made to the section of the NPPF on maintaining effective cooperation in the 2024 NPPF. Paragraph 24 of the NPPF states that: 'Effective strategic planning across local authority boundaries will play a vital and increasing role in how sustainable growth is delivered by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and

climate resilience. Local planning authorities [...] continue to be under a duty to cooperate with each other, and with prescribed bodies, on strategic matters that cross administrative boundaries.'

3.10 Chapter 3 of the Pre-Submission Local Plan Addendum 2025 deals with the Duty to Cooperate and Table 3.1 sets out development need and supply in the City.

3.11 Interim versions of the Council's Duty to Cooperate Statement have been published iteratively along with signed statements of common ground with all other relevant local planning authorities and prescribed bodies. These clearly demonstrate that PCC have engaged constructively, actively and on an on-going basis in relation to strategic matters as required by the duty to cooperate under section 33A of the Planning and Compulsory Purchase Act 2004.

3.12 Paragraph 27 of the NPPF requires the identification of matters which require collaboration. Chapter 3 of the Duty to Cooperate Statement sets out the key cross boundary issues as:

- Delivery of New Homes
- Habitat Regulation Assessment including Nutrients, Recreational Disturbance, Protected Sites and Biodiversity
- Development of a Thriving Economy
- Promotion of Sustainable and Active Cross Boundary Transport
- Cross Boundary Strategic Sites and Allocations

3.13 The Duty to Cooperate Statement explains how the City Council has worked to ensure that its Local Plan policies are consistent with those of other bodies where a strategic relationship exist on the above named matters, and how matters listed in paragraph 27 of the NPPF above have been addressed where relevant.

3.14 Paragraph 28 of the NPPF recognises that plans come forward at different times. The City Council has been pro-active on this matter and has worked with the neighbouring authorities of Gosport and Havant Borough Councils, which are at a similar stage of plan making as the City Council and also have unmet development needs. The three authorities have met with and written to the other three local authorities in South East Hampshire, namely Winchester City Council, Fareham Borough Council and East Hampshire District Council. We have asked them for assistance in meeting their combined unmet need of 18,347 homes and 19,973 square metres of new employment floorspace.

4. Pre-Submission Local Plan 2024

4.1 This chapter of the Topic Paper looks at the key changes in national policy brought in by the 2024 NPPF that the emerging policies in the Pre-Submission Local Plan 2024 and their evidence based studies need to be consistent with. The key changes are set out below under the relevant section of the NPPF. The table forming Appendix 2 references the relevant paragraphs of the NPPF which represent changes in national policy compared to the 2023 NPPF, along with the relevant paragraph of the Pre-Submission Local Plan 2024 which demonstrates consistency with it, and any supporting evidence based study. Further detail on these matters and consistency with national policy is set out in more detail in the relevant topic and background papers.

Delivering a sufficient supply of homes (chapter 5 of NPPF)

Looked after children

4.2 Paragraph 63 of the NPPF requires local plans to assess the housing need for looked after children in addition to but not limited to people who require affordable housing (including social rent), families with children, older people (including those who require retirement housing, housing with-care and care homes) students, people with disabilities and service families, travellers, people who rent their homes and people wishing to commission or build their own homes.

4.3 Chapter 11 of the HEDNA (2023) analyses the housing needs of specific groups in the City including looked after children.

4.4 Paragraphs 6.72 to 6.75 of the supporting text to Policy PLP18: Housing Mix address the housing needs of looked after children. No changes were found necessary on looked after children in regards to the NPPF.

Affordable Homes

4.5 Paragraph 64 of the NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required including the minimum proportion of Social Rent homes required. This is a new requirement compared to the 2023 NPPF.

4.6 Criterion 1 b of Policy PLP17: Affordable Homes from the Pre-Submission Local Plan 2024 sets the tenure mix of new affordable homes provided in line with this policy to be 70% affordable rent and/or social rent and 30% affordable home ownership. After due consideration it was decided not to prepare a new policy for the Addendum with a minimum requirement for Social Rent homes. Text is proposed in the draft Schedule of Changes to be added to paragraph 6.23, and 6.35 of the supporting text to Policy PLP17: Affordable Homes to explain this.

4.7 The Sustainability Appraisal has tested two affordable housing options in chapter 3. The first option was retaining the proposed policy approach, and the second option was changing the policy requirement to 25% affordable housing with social renting

forming 75% of this. It then explains the preferred approach taken by the Council as follows: Policy PLP17 already sets an ambitious overall target for affordable housing of 30% despite challenging viability conditions in the City. To add in a specific requirement for a certain amount of this to be social rent would have a negative impact on viability such that the overall percentage of affordable housing provision would need to be lowered. The Council prefers to keep the overall provision of affordable housing higher, rather than lowering it to secure more social rented accommodation. Social rent is still a tenure the Council will seek to secure, but the level of this will be determined on a site-by-site basis and will depend on the nature and viability of the scheme in question.

- 4.8 This is addressed in the Affordable Housing Topic Paper, which states that the approach has been selected based on discussions with the Council's Housing Department and is consistent with the approach taken in the Development Viability Assessment. It goes on to explain that the Council has decided not to require a specific amount of social rent homes, instead leaving the 70% element flexible on how this is split between affordable rent and social rent. This is because requiring a specific level of social rent would negatively impact on viability, such that it would reduce the overall level of affordable housing which could be delivered. The supporting text at paragraph 6.35 of the PLP explains that social rents will be prioritised.

First Homes

- 4.9 Footnote 31 of the NPPF states that the requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' WMS dated 24 May 2021, no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.

- 4.10 Policy PLP17: Affordable Homes from the Pre-Submission Local Plan 2024 does not include a requirement to provide First Homes. This is explained in paragraphs 6.26 and 6.27 of the supporting text. This is based on evidence from the HEDNA and the Local Plan Development Viability Assessment, whereby the delivery of First Homes could detrimentally impact the delivery of other affordable tenures that the Council deem as priorities for the City namely affordable and/or social rent and Shared Ownership.

- 4.11 No changes were required to Policy PLP17: Affordable Homes in order to be consistent with the NPPF on First Homes, but minor changes have been proposed to the supporting text (paragraphs 6.26-6.27) in the draft Schedule of Changes to reflect the change in emphasis from national policy. The Glossary is also proposed to be updated to reflect the new definition of affordable housing from the NPPF amongst other things.

Promoting healthy and safe communities (chapter 8 of NPPF)

Hot food takeaways and fast food outlets

- 4.12 Paragraph 97 of the NPPF stipulates that local planning authorities should refuse proposals for hot food takeaways near schools or youth gathering places,

unless sites are in designated town centres or where there is evidence of negative impacts on health, pollution, or anti-social behaviour.

- 4.13 There is no corresponding policy within the emerging Local Plan and given that the NPPF is a material consideration in decision-making, there is no need to include one.

Education provision

- 4.14 Paragraph 100 of the NPPF states that there should be a sufficient choice of early years and post-16 provision as well as other school places to meet the needs of new and existing communities. There is no corresponding policy within the Pre-Submission Local Plan 2024. However, reference is made to early years provision in paragraph 10.2 of the Infrastructure chapter and reference is made to education facilities for all ages in paragraph 10.78 of the Pre-Submission Local Plan (2024).

- 4.15 The Infrastructure Delivery Plan (IDP) covers the following education categories: early years (section 3.1), primary and secondary schools (section 3.2), special education needs and disability (SEND) provision (section 3.3) and further education (section 3.4). A number of infrastructure projects relating to these categories of education are set out in the Infrastructure Delivery Schedule forming appendix 2 of the IDP.

- 4.16 No changes were considered necessary to address this change in national policy.

Promoting sustainable transport (chapter 9 of NPPF)

- 4.17 Paragraph 109 states that transport issues should be considered from the earliest stages of plan-making, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. Paragraph 115 of the NPPF also reflects this new vision-led approach, stating that when considering allocation sites LPAs should ensure that any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree through a vision-led approach.

- 4.18 Portsmouth's Transport Strategy²⁶ (LTP4) takes a vision-led approach. The vision in LTP4 is that *'By 2038 Portsmouth will have a people-centred, connected, travel network that prioritises walking, cycling and public transport to help deliver a safer, healthier and more prosperous City.'* The transport vision that runs throughout the Local Plan, including all the allocations, is for a modal shift away from the private motor vehicle and the prioritisation of non-motorised transport modes.

- 4.19 Policy PLP47: Movement and Transport was reviewed, and no changes were found necessary in regards to the NPPF.

²⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2025/07/local-transport-plan4-update2021_final_accessible.pdf

Achieving well-designed places (chapter 12 of NPPF)

- 4.20 The Government emphasis has moved from beauty to good design as reflected in changes to chapter 12 of the NPPF on achieving well-designed places.
- 4.21 Policy PLP1: Design and its supporting text was reviewed and some minor changes proposed in the draft Schedule of Changes to remove reference to the word 'beautiful' and ensure consistency with national policy. Notably changes have been proposed to paragraphs 3.26, 3.27 and 3.28 and footnote 31 is proposed for removal. The wording of policy PLP1: Design has also been changed, as well as associated monitoring target in chapter 12. A minor change has been proposed to policy PLP4: Tipner East (2a) to remove the word beautiful.

Meeting the challenge of climate change, flooding and coastal change

Sustainable construction

- 4.22 The Written Ministerial Statement (WMS) made in December 2023 entitled Local Energy Efficiency Standards Update²⁷ curtails the use of policy approaches with energy-based metrics. These are designed to achieve emissions reductions through securing fabric efficiency standards and highly energy efficient buildings. The WMS has been challenged in the courts, but at the time of writing (November 2025) is still extant.
- 4.23 Policy PLP2: Climate Emergency and Policy PLP33: Sustainable Construction & Onsite Renewable Energy with their supporting text were reviewed and updated to ensure consistency with the WMS before the Pre-Submission consultation in 2024. Paragraph 3.56 of the PLP notes PCC's disappointment on the matter and encourages the Government to change national policy.
- 4.24 The WMS requires local plans that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation to be supported by robust viability evidence. Higher sustainable construction standards are addressed in chapters 2 and 8 of the Development Viability Assessment. The viability of development in large parts of the City is challenging particularly for flatted housing development and all employment and retail uses. The Assessment concludes that neither Policies PLP2 or PLP33 add to the costs of development over national standards or the cost covered elsewhere in the Assessment.

Flooding

- 4.25 The Planning Practice Guidance (PPG) on Flooding and Coastal Change²⁸ was updated in March 2025. Clarifications on the application of sequential testing were provided in the amended/new text of the PPG which were mostly focused on the approach to planning applications rather than plan-making. New flood maps for planning were also published in March 2025 by the Environment Agency, along with new national flood and coastal erosion risk information.

²⁸ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

4.26 Policy PLP31: Flooding from the Pre-Submission Local Plan 2024 was reviewed, and no changes were found to be necessary. The SFRA Levels 1 and 2 were also reviewed and no changes were found necessary in regards to national policy.

4.27 The HELAA (2025) was based on the March 2025 Environment Agency flood maps as well as the SFRA Level 1 maps. The Sequential & Exception Test²⁹ document assesses and makes policy recommendations for all the allocations in the emerging PLP. It has been updated in regards to the new Environment Agency flood maps, the new HELAA and the new allocation policies in the Pre-Submission Local Plan Addendum 2025.

4.28 The Development and Flood Risk Topic Paper³⁰ provides a stepping stone and explains the linkages between the extensive evidence base on flooding, strategic Policy PLP31: Flooding, development management Policy 32: Sustainable Drainage, and all the sites proposed for allocation in the PLP. It has been updated in regards to the new Environment Agency flood maps.

²⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/climate-emergency/>

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

5. Conclusion

5.1 This Topic Paper clearly demonstrates how the Pre-Submission Local Plan Addendum 2025 and the Pre-Submission Local Plan 2024 with its draft Schedule of Changes are consistent with the 2024 NPPF and so meet the relevant test of soundness. National planning policy will undoubtedly continue to change with the enactment of the Planning & Infrastructure Bill and the roll out of National Development Management Policies. This Topic Paper will be updated as necessary.

Appendix 1: Consistency of the Pre-Submission Portsmouth Local Plan Addendum 2025 with the NPPF and other relevant Government guidance

Issue	NPPF	Relevant national document	PLP Addendum policy / paragraph	Relevant supporting document(s)
Delivering a sufficient supply of homes	61,62, 78	PPG: Housing and economic land availability assessment ³¹ PPG: Housing and economic needs assessment ³²	Policy PLP 16: Housing Target Appendix 2: Deliverable and Developable sites from the 2025 HELAA (excluding strategic sites and site allocations) Appendix 3: Housing Trajectory	Housing Background Paper HEDNA (2023) HEDNA Update (2025) HELAA (2025)
Building a strong, competitive economy	86	The UK's Modern Industrial Strategy ³³ PPG: Housing and economic land availability assessment PPG: Housing and economic needs assessment	Policy PLP25: Employment Target	Thriving Economy Topic Paper HEDNA (2023) HEDNA Update (2025) HELAA (2025)
Maintaining effective cooperation	24-28	PPG: Plan-making	Chapter 3	Duty to Cooperate Interim Statement

³¹ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

³² <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³³

https://assets.publishing.service.gov.uk/media/68595e56db8e139f95652dc6/industrial_strategy_policy_paper.pdf

Appendix 2: Consistency of the Pre-Submission Portsmouth Local Plan 2024 and its draft Schedule of Changes with the NPPF and other relevant Government guidance

Issue	NPPF	Relevant national document	PLP policy / paragraph	Relevant supporting document(s)
Delivering a sufficient supply of homes: looked after children	63	n/a	PLP18	HEDNA (2023)
Delivering a sufficient supply of homes: affordable housing	64	n/a	PLP17	Sustainability Appraisal (2025) Affordable Housing Topic Paper (2025) Development Viability Assessment (2024)
Delivering a sufficient supply of homes: first homes	Footnote 31	n/a	PLP17	Affordable Housing Topic Paper (2025) HEDNA (2023) Development Viability Assessment (2024)
Promoting healthy and safe communities: hot food takeaways and fast-food outlets	97	n/a	n/a	
Promoting healthy and safe communities: educational provision	100	n/a	Paragraph 10.02, 10.78	IDP (2025)
Promoting sustainable transport	109, 115	-	PLP47	LTP4
Achieving well-designed places	Chapter 12	National Design Guide	PLP1, PLP4	
Meeting the challenge of climate change, flooding and coastal change: flooding	n/a	PPG: Flooding and Coastal Change ³⁴ Updated flood maps for planning	PLP31, PLP32	SFRA Level 1 SFRA Level 2 and Update Sequential & Exception Test Development and Flood Risk Topic Paper

³⁴ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Issue	NPPF	Relevant national document	PLP policy / paragraph	Relevant supporting document(s)
		New national flood and coastal erosion risk information		