

**Submission version of the Legal Compliance Toolkit
supporting the Pre-Submission Portsmouth Local Plan 2024
and Pre-Submission Local Plan Addendum 2025 combined**

March 2026



Introduction

The matters which are tested at a Local Plan examination are whether a Local Plan is legally compliant and sound. Local Planning Authorities should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. Before submission of a Local Plan for examination, it can be helpful to carry out a self-assessment of the soundness and legal compliance of the Plan, although this is not compulsory.

Portsmouth City Council (PCC) carried out a self-assessment of how the Pre-submission Portsmouth Local Plan (PLP) 2024 and the Pre-Submission PLP Addendum 2025 met the legal requirements and tests of soundness in July 2024 and December 2025. This document is an updated self-assessment of the legal compliance of the PLP 2024 and the PLP Addendum 2025 at Submission (Regulation 22). This document sets out the Council's legal compliance self-assessment using the Planning Advisory Service¹ Local Plan Route Mapper & Toolkit - Oct 2021, which has been updated by the Council to account for recent changes in the planning system, such as the National Planning Policy Framework (NPPF) update in December 2024. The completed soundness self-assessment is covered in a separate document².

The Portsmouth Pre-Submission Local Plan 2024 was prepared in accordance with the version of the NPPF published in December 2023 and published for consultation in summer 2024. Since the publication of the Pre-Submission PLP 2024, PCC decided to prepare a Local Plan Addendum including a version of Policy PLP3: Tipner West that has no adverse impact on internationally designated sites that cannot be mitigated. A number of other policies have also been updated for the following reasons:

- They were impacted by the decision to avoid adverse impacts on international conservation designations that could not be mitigated
- The amount and/or type of development had changed independently of the decision regarding international conservation designations
- They were impacted by the new 2024 NPPF and the need to take account of the latest evidence.

The policies in the Pre-Submission PLP Addendum 2025 have been prepared in accordance with the version of the NPPF published in December 2024. The Addendum was the subject of a focussed Pre-Submission consultation in winter 2025. All references to the NPPF in this document are to the December 2024 version unless noted otherwise.

Table 1 summarises the timetable for production for the Portsmouth Local Plan to the point of submission, as set out in the Local Development Scheme³. This was approved by the City Council on 30 April 2025. It will be referred to within the following Checklist.

¹ <https://www.local.gov.uk/pas/plan-making/local-plan-review-update/nppf-2021-local-plan-route-mapper-toolkit-reviewing-and>

² https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/Soundness-Quality-Assessment-of-the-Reg-19-Pre-Submission-Portsmouth-Local-Plan-and-the-Reg-19-PLP-Addendum_FINAL-VERSION_PDF.pdf

³ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/local-development-scheme/>

References to the following policies will be drawn from the Pre-Submission PLP Addendum 2025⁴:

- PLP3: Tipner West
- PLP6: Portsmouth City Centre
- PLP7: Fratton Park & the Pompey Centre
- PLP9: Horsea Island Strategic Open Space
- PLP10: Land West of Portsdown Technology Park
- PLP11: Port Solent
- PLP16: Housing Target
- PLP25: Employment Target

Unless otherwise stated, all other references to chapters, policies and paragraphs will be drawn from the Pre-Submission PLP 2024 (Regulation 19)⁵ document.

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf>

⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

Table 1: Timetable for production of the Portsmouth Local Plan as set out in the LDS (April 2025)

Timetable for production		
Preparation Reg 18	Issues and Options consultation	✓ July 2017
	Tipner Strategic Development Area	✓ February 2019
	Evidence base consultation ('Local Plan update')	✓ February 2019
	Consultation on a draft Local Plan	✓ September 2021
Pre-Submission Reg 19	Consultation on the Pre-Submission Local Plan	✓ Summer 2024
Pre-Submission Reg 19	Consultation on the Pre-Submission Local Plan Addendum	Winter 2025
Submission Reg 22	Submission of Local Plan and its Addendum to Secretary of State for examination	Spring 2026
Examination Reg 24	Examination of the Plan by an appointed Inspector	Spring 2026 - winter 2026/27
	Consultation on Main Modifications	Winter 2026/27
Inspector's report Reg 25	Final Inspector's Report	Spring 2027
Adoption Reg 26	Formal adoption of the Local Plan by the Council	Spring 2027

As the PLP 2024 and the PLP Addendum 2025 have reached Pre-Submission stage (Regulation 19), this checklist has been completed up until Question 66 of Stage F and is up to date as of March 2026. Questions 67 - 71 of Stage F will be updated at the appropriate time in the process..

TOOLKIT PART 3: LOCAL PLAN PROCESS REQUIREMENTS CHECKLIST

Why you should use this part of the toolkit

The aim of this part of the toolkit is to assist you in ensuring that the relevant process requirements of specific legislation and policy have been met to enable you to proceed towards adoption of a local plan policies update.

The part of the Toolkit deals only with the process requirements for plan preparation set out in legislation and the NPPF associated with reviewing policies and updating local plan policies. Toolkit Part 1 provides more detail on carrying out a local plan policy review assessment. Toolkit Part 2 highlights the content that should be included in the local plan policies update as prescribed in the NPPF. Soundness and quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

The table below sets out key plan making process questions that you must consider when undertaking the stages of reviewing policies and updating your local plan policies. The rows marked:

- 'L' set out legal requirements included in legislation relevant for that stage of plan making; and
- 'PM' highlight project management reminders arising from these requirements.

For each requirement the table also highlights, where relevant, the supporting documents in which this information is typically recorded.

For each of the requirements listed indicate whether you have met the requirement with a *Yes* or *No*. You should ensure you can answer each question relevant to that plan stage with a 'Yes' before moving to the next stage of updating your plan. You can use the 'comments' section in the table to confirm the title and date of relevant documents and include hyperlinks to where they are published on your website (or file paths for documents not yet published).

The following abbreviations in the table are used:

P&CA - [Planning and Compulsory Purchase Act 2004 \(as amended\)](#)

T&CP - [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#)

The table does not make any reference to specific national planning policy guidance, case law or Ministerial Statements on the basis that this is not static and the degree to which it is relevant will vary depending upon particular circumstances. There is case law relevant to most plan making authorities; for example at the time of publication, when undertaking a screening assessment for a Habitats Regulation Assessment, of

particular relevance is the '[People Over Wind judgement](#)'⁶ (Court of Justice of the European Union, 12 April 2018), the '[Dutch Nitrogen](#)'⁷ case (Court of Justice of the European Union, 7 November 2018) and other recent relevant Court of Justice judgements. Therefore, when developing your local plan update, you need to work with your legal team to ensure that you are familiar with relevant case law and Ministerial Statements and take account of these as and when appropriate.

You should also be aware that any reference to specific legislation includes any amendments to those instruments that are in force at the time of publication. Legislation relevant to England, including amendment regulations, can be accessed online at www.legislation.gov.uk. It is important that you check for any future amendments that may be brought into force following publication of this toolkit.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to ensure that requirements are met. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find it (or some elements) helpful to include with your supporting documents or to help you answer any questions from the Planning Inspector related to plan process.

⁶ <https://curia.europa.eu/juris/document/document.jsf?text=&docid=200970&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=619449>

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CA0293&from=DE>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage A: Navigating the process of reviewing Local Plan policies				
1.	L	Have you consistently kept under review the matters which are likely to affect the development of your area and the planning of its development?	P&CPA Section 13 T&CP Regulation 34	Y	• Updates and changes in national policy and legislation • Authority Monitoring Report • Baseline technical data	Yes, we have consistently kept under review the matters likely to affect planning and development of the City. The new NPPF was published on 12 December 2024. As well as changes to the Development Management process, changes with implications for plan-making included: • Raising the national target for housebuilding from 300,000 to 370,000 per year. • Revisions to the Standard Methodology for calculating housing need so that it is based on the stock of existing housing and uplifted by an affordability multiplier based on local circumstances. This means the housing need for Portsmouth rose from 897 to 1,019 per year. • Requirement for LPAs to identify appropriate sites for laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. • A new form of planning to deal with larger than local issues, with full details to be announced in the future. This has, in the short term, strengthened the Duty to Cooperate. The 'maintaining effective co-operation' section of the NPPF has been updated to make sure strategic plan policies align with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers. Specifically, plans should ensure a

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						consistent approach is taken to planning the delivery of major infrastructure; unmet development needs from neighbouring areas are provided'; and any allocation or designation cutting across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities. • A revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 with the relevant provisions to be rolled out in 2025, with transitional arrangements for LPAs which are at an advanced stage of plan-making. • 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. PCC intends to submit the Local Plan for examination in spring 2026. The Council has prepared a Consistency with National Policy Topic Paper⁸, setting out how the PLP and its Addendum is consistent with the 2024 NPPF. The PLP Addendum 2025 has been prepared in accordance with the current NPPF (December 2024). The Plan period has now changed from 2020-2040 (as per the 2024 PLP) to 2025-2040. This is explained in paragraphs 0.15 and 0.16 of the PLP Addendum 2025

⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/FINAL-National-Consistency-Topic-Paper.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						which states that the change is justified as it removes five years of historic development from the Plan and ensures that the Plan is forward looking. It also better aligns with the timing of the introduction of the new standard method housing need figure. As a consequence, the strategic policies within the Plan now only look ahead over a 13-year period from the anticipated date of adoption, rather than 15 years. This was discussed with PCC's advisory Inspector, who wrote that 'Rebasing the start of the plan period to 1 April 2025 is justified and reflects that the standard method is forward looking.' Every year, the Council produces an Authority Monitoring Report⁹ (AMR), which is published on the Council's website to monitor the implementation of The Portsmouth Plan Core Strategy (adopted 2012) and other development plan documents. This contains an update on national changes. The PLP is evidenced by a number of iterative versions of the Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). The PLP 2024 and PLP Addendum 2025 are informed by a number of evidence base studies commissioned by the Council and published on the Council's new Local Plan evidence webpage¹⁰. Evidence base work for the new Local Plan (LP) commenced in 2016 as part of the new Local Plan review.

¹⁰ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Supporting evidence base studies are consistently kept under review to support and keep up to date the matters affecting the development of Portsmouth. The final evidence base can be viewed on the PLP Core Document Library webpage. For example, in 2023, the Council commissioned an updated Housing and Economic Development Needs Assessment (HEDNA) to reflect the plan period of 2020-2040 to ensure the Pre-Submission (Regulation 19) PLP 2024 was based on the latest evidence and conducted post-Brexit and the Covid-19 pandemic. The Council has again commissioned a targeted HEDNA update in 2025 to support the Local Plan Addendum policies on housing and employment targets and respond to NPPF 2024 changes. The Council commissioned an updated Retail Needs Study published in 2024 updating the existing retail and town centres evidence base study, the 2015 Portsmouth Retail Study and the 2020 Portsmouth City Masterplan Retail Focus Statement. This evidence base update was required to reflect the impact on the retail market and town centres of the Covid-19 pandemic in 2019; reform to the Use Classes Order revoking the old Use Classes B1, A1-A5, D1 and D2 and introducing the new Use Classes E, F.1 and F.2; and new permitted development rights allowing the change of use of buildings in Commercial, Business and Service (Class E) use to residential. PCC's decision to prepare a version of Policy PLP3: Tipner West for the PLP Addendum 2025 that does not result in adverse impacts on international conservation

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						designations that cannot be mitigated has necessitated an update to a number of evidence-based studies including the HEDNA on development needs and the Housing and Economic Land Availability Assessment (HELAA) on the supply of development sites for the new plan period of 2025-2040. These support new Addendum policies on housing (PLP16) and employment (PLP25) targets in the PLP Addendum 2025. This is in addition to updates necessitated by the new NPPF, including changes to the Standard Method.
2.	L	Have you prepared to undertake a review of your local plan policies and complete the review within 5 years of the date of adoption of the current local plan? (also see guidance within Part 1 of the Route Mapper and the 'Local Plan Review Assessment' within Part 1 of the Toolkit)	T&CP Regulation 10A NPPF para 33	Y	Local Development Scheme	The current Plan (The Portsmouth Plan - Portsmouth's Core Strategy¹¹) was adopted in January 2012. It, alongside a number of saved policies from the Portsmouth City Local Plan¹² (2006); the Milton Neighbourhood Plan¹³ (2022); Somerstown and North Southsea Area Action Plan¹⁴ (2012); Southsea Town Centre Area Action Plan¹⁵ (2007); and the Hampshire Minerals and Waste Plan¹⁶ (2013) form the current local planning policy framework in the City. The Local Plan policies review and update has been a lengthy process due to the complex nature of development within the City, particularly in relation to development at the Tipner peninsula (allocated as two sites: PLP3 Tipner West¹⁷ in the Local Plan Addendum

¹¹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/the-portsmouth-plan-adopted-2012/>

¹² <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-city-local-plan-adopted-2006/>

¹³ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/10/Milton-Plan-Final-adopted.pdf>

¹⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-somerstown-and-north-southsea-area-action-plan.pdf>

¹⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-southsea-town-centre-area-action-plan.pdf>

¹⁶ <https://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf>

¹⁷ Previously PLP3: Tipner West and Horsea Island East in the Pre-Submission Local Plan 2024.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						2025 and PLP4 Tipner East in the Pre-Submission Local Plan). The review of the LP began in July 2017, following the Cabinet decision to commence the Local Plan review and updating process, and undertake public consultation on the Portsmouth Local Plan Issues and Options document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹⁸. This was the first stage in preparing the new draft PLP, setting out the vision and issues for the City and the options to address them. Following the Issues and Options consultation, the emerging PLP has undergone an additional three consultations. This included a further two Regulation 18 stage consultations to inform the final version of the Pre-Submission Local Plan: • Local Plan Evidence Base Update¹⁹ (2019). This provided an update on the Council's evidence gathering for key issues in the draft LP. The responses to this consultation informed the development of the Portsmouth Local Plan 2038 Regulation 18 Consultation Document. • Tipner Strategic Development Area²⁰ (2019). This consultation focused solely on the Tipner Strategic Development Area. It set out the issues and possible options for the regeneration of Tipner and Horsea which included the

¹⁸ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3801&Ver=4>

¹⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Update.pdf>

²⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						reclamation of land from Portsmouth Harbour and aimed to identify where further work was required for the evidence base, to establish the appropriate site boundary and land uses at Tipner. • Portsmouth Local Plan 2038 Regulation 18 Consultation Document²¹ (2021). This document formed a new initial draft plan, setting out the draft vision and objectives for the development of the City up to 2038, and the proposed approach to strategic planning issues and development management in Portsmouth. The responses to the Tipner Strategic Development Area consultation fed into the three options proposed in this Regulation 18 plan. This Regulation 18 consultation also forms the basis of the Regulation 22 Consultation Statement²² (July 2024). All of the responses received in the four Regulation 18 consultations were analysed and helped inform the final version of the PLP for Pre-Submission (Regulation 19). The draft Pre-Submission Local Plan 2024²³ was consulted on between July and September 2024. The responses to the consultation are summarised in the Regulation 22 Consultation Statement²⁴ (March 2026) published and submitted along with the Local Plan for examination.

²¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

²² https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/FINAL_Consultation-Statement_Reg_22.pdf

²³ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

²⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Submission_Consultation_Statement_Reg_22.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Particular delays to the Local Plan review and update have arisen due to the Tipner site, which has a complex planning history and numerous constraints including international nature conservation, flooding, contaminated land and heritage. The 2017 Issues and Options document proposed development of three strategic sites - Tipner West, Tipner East, and Tipner Firing Range. This allocation was largely supported at consultation²⁵, and further work was required to determine the appropriate proposals and way forward for the area. Tipner West has previously been partly allocated along with Tipner East in The Portsmouth Plan (2012). Following the 2017 consultation, a Tipner-focussed consultation (Tipner Strategic Development Area consultation) in 2019 put forward a number of options for development at Tipner. One option proposed was for significant land reclamation in a 'super peninsula' proposal ('Lennox Point'), which received strong objections from the Hampshire and Isle of Wight Wildlife Trust and the RSPB due to direct loss of SPA/Ramsar habitat. The responses to this consultation fed into the three options (Super-peninsula - significant land reclamation; no reclamation; maintain in current condition) proposed in the Portsmouth Local Plan 2038 Regulation 18 Consultation Document²⁶ (2021) for Tipner. The super-peninsula option involved reclamation of a considerable amount of land from Portsmouth Harbour, which is protected by multiple

²⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-Local-Plan-summary-of-responses.pdf>

²⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						nature conservation designations. A significant amount of opposition to development at Tipner was received from this consultation, particularly towards Option 1 (significant reclamation). In December 2021, a report²⁷ (minute 105) containing a summary of the Tipner West and Horsea Island East project and summary of the Regulation 18 Consultation outcomes was presented to Cabinet and then to Full Council, who resolved to pause all further work on the 'super peninsula' (Lennox Point) Option 1 to allow for consideration of alternative options and financial viability. This consequently paused work on the Local Plan, with work to update the Local Plan only able to resume once the development proposals for Tipner West were resolved. In October 2022, following further assessment, all existing options for Tipner West were discounted and a set of guiding principles for an alternative option were agreed by Full Council²⁸. This included the ruling out of the 'Significant Land Reclamation' Option (Option A) - original 'Lennox Point' masterplan and 'Do Minimum' Option (Option D), allowing work on the Tipner West and Horsea Island East strategic site allocation (PLP3) and the wider Local Plan to resume and progress forwards. These guiding principles were updated in October 2023²⁹ and the seven Council principles confirmed in March 2024³⁰.

²⁷ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=4871>

²⁸ <https://democracy.portsmouth.gov.uk/documents/s41717/Tipner%20West%20Report.pdf>

²⁹ <https://democracy.portsmouth.gov.uk/documents/s48227/Report - TRP Principles.pdf>

³⁰ <https://democracy.portsmouth.gov.uk/documents/s50877/240223%20-%20Tipner%20Cab%20update%20FINAL.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Pre-Submission Local Plan 2024 proposed the allocation of the strategic site of Tipner West & Horsea Island East under Policy PLP3. It was known that the allocation could not be delivered without some adverse effects on the international conservation designations of Portsmouth Harbour. Therefore, PCC as the local planning authority and competent authority could not give effect to the Local Plan under the Habitat Regulations unless the Government as appropriate authority notified them that they could do so. The City Council considered it prudent in terms of plan making to seek an Opinion from the Government, as appropriate authority under the Habitats Regulations, asking whether IROPI existed to justify the allocation. Two separate requests were made: the first response received in 2023 was that the request was premature and the second response in February 2025 was negative. The second opinion was withdrawn (because the Secretary of State agreed it was unlawful) shortly afterwards, and a new Opinion was issued in July 2025. The July 2025 Opinion was unlawful and also withdrawn. At the time of writing PCC is awaiting a lawful IROPI Opinion. Notwithstanding the City Council's view that the Secretary of State's IROPI opinions were both unlawful, the City Council decided, on a pragmatic basis and cognisant of the pressing 12 June 2026 deadline for submission of a Local Plan for examination, to prepare a version of Policy PLP3 that had no adverse impact on internationally designated sites that cannot be mitigated through a Local Plan Addendum. This has consequently resulted in PCC reducing development proposals for PLP3:Tipner West including the removal of the former

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						proposal to deliver a strategically significant marine hub. This was agreed by Cabinet in April 2025³¹. The PLP has been identified in the Portsmouth Local Development Scheme³² (LDS), which is a timetable for the production of Portsmouth's planning policy documents. The LDS has been updated throughout the preparation of the Local Plan with the first LDS including the new Local Plan published in 2017. The latest version of the LDS came into effect on 30 April 2025. Section 5 of the LDS relates to the monitoring and reviewing of development plan documents.
3.	L	Have you prepared to review your Statement of Community Involvement and complete the review within 5 years of the date of adoption of the current Statement of Community Involvement?	P&CPA Section 18 and 19(3) T&CP Regulation 10A	Y	• Local Development Scheme • Statement of Community Involvement	Portsmouth City Council's current Statement of Community Involvement (SCI) was adopted in December 2023, following consultation on the document in the summer of 2023. The SCI was a review and update to its previous version³³ adopted in June 2017. The Council has recognised that a refresh of the SCI was required due to significant changes in the way that the Council and communities interact, including through greater use of online communications. The SCI explains how residents and businesses can take part in the process of developing planning policy and managing new development in Portsmouth. Section 5 of the SCI relates to the monitoring and review of the SCI.

³¹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5908>

³² <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/local-development-scheme/>

³³ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/statement-of-community-involvement/>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Council will review the SCI every five years as stated in Regulation 10A (1) (b) of The Town and Country Planning (Local Planning) (England) (Amendments) Regulations 2017). This means that this SCI will next be reviewed in 2028 unless regulatory requirements change or monitoring indicates that early review is necessary.
4.	PM	Have you checked your scheme of delegation and engaged with the relevant person(s) who will make decisions on the outcome of any review(s) of the Local Plan policies and the Statement of Community Involvement?	The Council's scheme of delegation	Y	• The Council's scheme of delegation	The decisions relating to the preparation of the Pre-Submission PLP 2024 and Pre-Submission PLP Addendum 2025 have been taken in accordance with the Council's constitution³⁴. The Council's Scheme of Delegation is set out in its constitution. The Assistant Director of Economy, Planning and Transport has delegated authority over some decisions in the Local Plan process. The commencement of the Local Plan review under the Issues and Options consultation³⁵; the Local Plan Evidence Base Update and Tipner Strategic Development Area consultations³⁶; and the draft Local Plan (Regulation 18) consultation³⁷ were approved by Cabinet. Consultation on the Pre-Submission version of the Local Plan (Regulation 19)³⁸ and submission for examination was approved by Full Council in May 2024. Consultation on the Pre-Submission version of the PLP

³⁴ <https://www.portsmouth.gov.uk/services/council-and-democracy/policies-and-strategies/constitution/>

³⁵ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MIId=3809&Ver=4>

³⁶ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MIId=4068&Ver=4>

³⁷ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MIId=4717&Ver=4>

³⁸ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MIId=5603&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Addendum and submission for examination was approved by Full Council on 11 November 2025³⁹. Updates to the SCI were approved for consultation by Cabinet and the changes were made under delegated powers by the Assistant Director of Planning & Economic Growth (now Economy, Planning and Transport) in December 2023⁴⁰.
5.	L	Have you prepared a report for the relevant person(s) deciding on the review of the local plan policies that takes into account the matters that are likely to affect the development of your area and the planning of its development to enable them to make a decision on whether: 1. the policies do not need updating (publishing the reasons for this decision); and / or 2. that one or more strategic policies do need updating (moving to Stage B to update your Local Development Scheme to set out the timetable for this revision)?	T&CP Regulation 10A NPPF para 33	Y	• Published report and decision • 5 year plan review assessment (See Part 1 of this toolkit) • Baseline technical data	In July 2017, a report was prepared to seek approval from the Cabinet to commence the Local Plan review process and undertake public consultation on the Portsmouth Local Plan Issues and Options document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012⁴¹. This report set out the process for the Local Plan Review, the key issues and development targets for the City and the consultation process. A copy of the report⁴² (Item 4) and decision⁴³ is available on the Council's website. The Cabinet approved the Portsmouth Local Plan Issues and Options document for eight weeks of public consultation. Consequential amendments to the Council's LDS to account for changes to the Local Plan consultation timetable as set out in the LDS were also approved at the beginning of the Local Plan review process in July 2017 by Cabinet (Item 4).

³⁹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5848&Ver=4>

⁴⁰ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5352&Ver=4>

⁴¹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3809&Ver=4>

⁴² <https://democracy.portsmouth.gov.uk/documents/s15877/Local%20Plan%20Issues%20and%20Options%20report.pdf>

⁴³ <https://democracy.portsmouth.gov.uk/documents/s16434/Cabinet%20Record%2027%20July%202017.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Between 2017 and 2019, the Council progressed with the production of the Evidence Base Update document for consultation. In February 2019, a report was prepared for Cabinet by the Assistant Director of City Development to update Members on the progress of preparing the new draft PLP, specifically relating to the work undertaken to promote a development option at Tipner⁴⁴. This included a request to publish a second Regulation 18 consultation document and its supporting evidence base, and a Strategic Development Area document for Tipner for public consultation. The Portsmouth City Local Plan Consultation Document and Tipner Strategic Development Area Consultation Document were approved for 6 weeks public consultation. A copy of the report⁴⁵ and decision⁴⁶ are available on the Council's website. As stated in Q4, consultation on the Pre-Submission version of the Local Plan (Regulation 19)⁴⁷ and submission for examination was approved by Full Council in May 2024. The decision to prepare the PLP Addendum was agreed by Cabinet in April 2025⁴⁸. The decision to consult on the PLP Addendum and submit

⁴⁴ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4068&Ver=4>

⁴⁵ <https://democracy.portsmouth.gov.uk/documents/s21637/Local%20Plan%20Update%20report.pdf>

⁴⁶ <https://democracy.portsmouth.gov.uk/ieDecisionDetails.aspx?AIId=10385>

⁴⁷ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5603&Ver=4>

⁴⁸ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5908>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						the PLP Addendum for examination was agreed at Full Council in November 2025 ⁴⁹
		Stage B: Scoping and preparing for your policies update				
6.	L	Where an update of the Statement of Community Involvement is required have you prepared, consulted and adopted a revised Statement in accordance with the procedures set out in Part 2 of the P&CPA? Have you ensured that the Statement is up to date and reflects who the relevant consultation bodies are - for all stages of the plan making process	P&CPA Part 2 T&CP Regulation 18 NPPF Para 16	Y	Statement of Community Involvement	The Council published its previous version of the SCI in 2017, recognising that a refresh of the SCI was required due to significant changes in the way that the Council and communities interact. An updated version of the SCI was approved for a six-week public consultation by Cabinet on 27 June 2023⁵⁰ (Item 6). Following review of the responses to the consultation received, the SCI was amended where appropriate. The latest version of the SCI was adopted

⁴⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf>

⁵⁰ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5352&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		- and what actions will be undertaken to involve the community in any updates to the local plan policies?				on 14 December 2023 and is available on the Council's website⁵¹. The SCI sets out in detail how the Council involves the community in planning, explaining how residents and businesses can take part in the process of developing planning policy and of managing new development in Portsmouth. The SCI sets out the approach to consultations and engagement. It lists the general consultation bodies for Portsmouth in Appendix A; the specific consultation bodies in Appendix B; and Neighbourhood Plan consultation bodies in Appendix C. The SCI also explains how some of the evidence base supporting the Local Plan will be consulted on. Table 1 of the SCI explains the level of consultation the Council will undertake for different planning policy documents. In particular to the Local Plan, the Council will undertake consultation according to the statutory requirements at various stages of the Local Plan process. Figure 1 of the SCI sets out the key stages of local plan preparation and outlines the process the Council will follow to involve the community.

⁵¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2023/12/Draft-Statement-of-Community-Involvement-2023-aa-accessible.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
7.	PM	Have you prepared a report for the relevant person(s) who will make a decision on the outcome of the review of the Statement of Community Involvement including where relevant details and justification of proposed changes? This should also consider the any practicalities of making documents available for inspection at the submission stage.	P&CPA Section 18 T&CP Regulation 10A	Y	- Published report and decision - Statement of Community Involvement	An update to the SCI, which sets out the approach to consultations and engagement, was approved for a six-week public consultation by Cabinet on 27 June 2023. Cabinet agreed that, assuming that no major matters leading to substantial changes are raised as part of the consultation, the SCI is adopted by the City Council. A number of responses were received following the SCI consultation, and consequently the SCI has been updated. Some updates of note included amendments relating to data protection and General Data Protection Regulations (GDPR) in paragraph 2.4.4; the addition of the level of consultation required for Article 4 Directions in table 1; updates to how the Council makes information on planning applications available to the public and how comments on such applications can be made and the complaints procedure in section 4; and updates to the general consultation bodies in appendix A. These changes were approved under delegated powers by the Assistant Director for Economy, Planning and Transport. The SCI was adopted by the Council on 14 December 2023. A copy of the report on the updated SCI⁵² and the decision⁵³ to adopt is published on the Council's website.
8.	PM	Have you identified the proposed scope of the update of the local plan by setting out the principal policy areas that will be considered?		Y	- Published report and decision on review of local plan policies - Baseline technical data	The Council has conducted work to develop the scope of the new draft PLP for several years.

⁵² <https://democracy.portsmouth.gov.uk/documents/s46322/Statement%20of%20Community%20Involvement.pdf>

⁵³ <https://democracy.portsmouth.gov.uk/documents/g5352/Decisions%2027th-Jun-2023%2014.00%20Cabinet.pdf?T=2>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						In July 2017, the Council prepared a report⁵⁴ for Cabinet to commence the Local Plan review process. This review sets out eight objectives for achieving the Portsmouth Vision 2034 as well as the principal policy areas to be considered, including housing, employment and retail, health, heritage and the environment. The Council consulted on the topics to be addressed in the new LP under the Issues and Options Consultation⁵⁵, which was the first stage of the Local Plan review. It set out the Council's vision for the City's development, the issues facing the City and the Council's proposed approach or options to address them. In February 2019, the Council launched two consultations: the first being the Local Plan Evidence Base Update which provided an update on evidence gathering for the LP and the second being the Tipner Strategic Development Area Consultation Document⁵⁶, which set out the issues and possible options for the regeneration of Tipner and Horsea. This included the reclamation of land from Portsmouth Harbour and identified where further work was required for the evidence base to establish the appropriate site boundary and land uses at Tipner. The responses to this consultation fed into the three options proposed in the Portsmouth Local Plan 'Regulation 18' consultation draft document⁵⁷. This was approved by Cabinet in July 2021 for public consultation⁵⁸, and consulted upon in

⁵⁴ <https://democracy.portsmouth.gov.uk/documents/s15877/Local%20Plan%20Issues%20and%20Options%20report.pdf>

⁵⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Issues-and-Options.pdf>

⁵⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf>

⁵⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

⁵⁸ <https://democracy.portsmouth.gov.uk/documents/s31723/Draft%20Portsmouth%20Local%20Plan.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						September 2021. The supporting evidence for the Plan was further developed to include the preparation of commissioned studies, engagement with neighbouring authorities and an updated appraisal of all potential development land in the City (including a 'call for sites'). Subsequently, the responses to the Regulation 18 consultations have developed and reshaped the scope of the Regulation 19 Pre-Submission Local Plan 2024, to respond to developing local issues and ensure it is underpinned by relevant and up-to-date evidence. Further detail on how the Regulation 18 consultation has shaped the Pre-Submission Local Plan 2024 is published in the Regulation 22 Consultation Statement. Additional evidence updating and gathering has taken place since 2021, as well as the addition of new site allocations in the Pre-Submission PLP 2024. The Pre-Submission PLP covers the plan period of 2020-2040, amended by the PLP Addendum 2025 to the period of 2025-2040, and seeks to achieve the six strategic objectives in the Portsmouth 2040 Vision. These act as stepping stones between the high-level Vision and the Local Plan policies. The Plan seeks to deliver positive outcomes for everyone in the City whilst addressing the climate and biodiversity emergencies and delivering sustainable growth in a City with limited capacity for growth.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						All evidence relating to the Local Plan consultations undertaken is published on the Council's website⁵⁹. The scope of the Pre-Submission Local Plan Addendum 2025 was influenced the City Council's decision to prepare a version of Policy PLP3: Tipner West that had no adverse impact on internationally designated sites that could not be mitigated. Five other allocation policies were also updated as they were impacted by the decision to avoid adverse impacts on international conservation designations that could not be mitigated; the amount and/or type of development had changed independently of the decision regarding international conservation designations; or they were impacted by the new 2024 NPPF and the need to take account of the latest evidence. The following replacement policies are contained in the Addendum: • PLP3: Tipner West • PLP6: Portsmouth City Centre • PLP7: Fratton Park and the Pompey Centre • PLP9: Horsea Island Strategic Open Space • PLP10: Land West of Portsdown Technology Park • PLP11: Port Solent • PLP16: Housing Target • PLP25: Employment Target The remaining 48 policies in the Pre-Submission PLP 2024 remain unaffected by the Council's pragmatic decision following the Secretary of State's February

⁵⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						2025 IROPI decision, changes to the NPPF, or updated evidence. They therefore are not included within the scope of the Pre-Submission PLP Addendum 2025.
9.	PM	Have you drafted a project plan to manage and timetable the development and update of the local plan policies?		Y	● Local Development Scheme ● Authority Monitoring Report	The PLP has been identified in the Portsmouth Local Development Scheme⁶⁰ which is the timetable for the production of Portsmouth's planning policy documents. The LDS has been updated throughout the preparation of the Local Plan, with the first LDS adopted in July 2017. The previous version of the LDS came into effect on 11 February 2025, having been approved at Cabinet. An updated LDS was prepared for approval at Cabinet on 29 April 2025⁶¹. Following approval at Cabinet, it replaces the 2024 version with effect from 30 April 2025. The LDS is monitored in the AMR, most recently updated in February 2025⁶², which reviews the progress made on a number of development plan documents and other supporting documents produced by PCC in relation to the timetable and milestones set out in the LDS. The updated AMR for the monitoring period of 1 April 2024 - 31 March 2025 is due to be published in Winter 2025/2026.

⁶⁰ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/local-development-scheme/>

⁶¹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5908&Ver=4>

⁶² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/04/AMR-2023-2024-accessible-aa.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
10.	L	Have you prepared a new Local Development Scheme which identifies the local plan policies update document(s) and the Sustainability Appraisal and timescales for their production?	P&CPA Section 15(2) and Section 19(1)	Y	• Local Development Scheme • Authority Monitoring Report	Amendments to the LDS were approved at the beginning of the Local Plan review process in July 2017 by the Cabinet (Item 4)⁶³. Since then, the LDS has been updated throughout the review and preparation of the Local Plan including revisions to the LDS in July 2018⁶⁴ (Item 6), February 2019⁶⁵ (Item 6); July 2021⁶⁶ (Item 5); July 2022⁶⁷ (Item 5), June 2023⁶⁸ (Item 7), January 2024⁶⁹ (Item 4), February 2025⁷⁰, and April 2025⁷¹. The LDS includes a timetable for production of the Local Plan from Preparation (Reg 18), Pre-Submission (Reg 19); Submission (Reg 22); Examination (Reg 24); the Inspector's Report (Reg 25); and Adoption (Reg 26). The LDS identifies that a Sustainability Appraisal has been prepared as part of the new Local Plan preparation process to systematically assess the extent to which the plans and policies, when judged against reasonable alternatives, will help to achieve key environmental, economic, and social objectives.

⁶³ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3809&Ver=4>

⁶⁴ <https://democracy.portsmouth.gov.uk/documents/s19235/Local%20Plan%20Progress%20report.pdf>

⁶⁵ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4068&Ver=4>

⁶⁶ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4717&Ver=4>

⁶⁷ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4995&Ver=4>

⁶⁸ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5352&Ver=4>

⁶⁹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5509&Ver=4>

⁷⁰ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5698&Ver=4>

⁷¹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5908&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
11.	L	Does your Statement of Community Involvement and project plan identify the legally prescribed bodies ⁷² you will engage with under the duty to cooperate? This should also include each Local Enterprise Partnership and each Local Nature Partnership ⁷³ in the area.	P&CPA Section 20 and Section 33A T&CP Regulation 4	Y	• Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground	Yes, the SCI sets out the approach to consultations and engagement. It identifies the legally prescribed bodies engaged with under the Duty to Cooperate (DtC). The general consultation bodies for Portsmouth are set out in Appendix A. The legally prescribed bodies the Council will engage with under the DtC (specific consultation bodies) are detailed in Appendix B of the SCI. While the Local Enterprise Partnership (now disbanded) and Local Nature Partnership are not formally referred to in the SCI, the Council has engaged with the legally prescribed bodies under the Duty to Cooperate throughout the review and preparation of the Plan. The Solent LEP was created in 2010 following the abolition of regional development agencies as a non-statutory body responsible for economic development. Led by the business community and supported by three university partners, three unitary authorities (including Portsmouth), eight district councils and one county council, this partnership worked together to secure a more prosperous and sustainable future for the Solent area. In 2023 the government confirmed its decision to cease LEP funding in the 2023/24 financial year moving to new devolved funding arrangements. In the absence of devolution locally, the functioning economic area of Isle of Wight, Portsmouth and Southampton was confirmed in March 24 and is working together as the Solent Growth Partnership. Engagement between the Council and the legally described bodies is ongoing as part of the preparation of

⁷² <https://www.legislation.gov.uk/ukxi/2012/767/regulation/4/made>

⁷³ <https://www.legislation.gov.uk/ukxi/2012/2613/regulation/2/made>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						the PLP and the stages of engagement with the bodies the Council will engage with are detailed within the project plan. Detail on engagement is published in a DtC Statement. The Council published an Interim DtC statement ⁷⁴ in November 2025 to support the Pre-Submission consultation on the Local Plan Addendum.
12.	L	Have you identified the “strategic matters” that will be included in the updated local plan policies and which have / would have a significant impact on your area and at least one other planning area and on which you are required to engage constructively, actively and on an ongoing basis?	P&CPA Section 20 and Section 33A	Y	● Published report and decision on review of local plan policies ● 5 year plan review assessment (See Part 1 of this toolkit) ● Draft pre-submission Local Plan ● Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	In 2017, the published report on the decision to review the Local Plan⁷⁵ and the accompanying Issues and Options Consultation Paper⁷⁶ identified the strategic matters, vision, objectives and policies to be included in the Local Plan. These relate to: • The scale of future development • How development will be distributed in the city • The range of housing and employment provision • The retail hierarchy and the City Centre • Strategic development sites and broad areas of opportunity • Transport and infrastructure requirements • Flood risk • Sustainable development and climate change • Health, recreation, sports and open space • The natural environment • Planning for heritage, tourism and culture • Development management policies

⁷⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Duty-to-Cooperate-Statement-November-2025.pdf>

⁷⁵ <https://democracy.portsmouth.gov.uk/documents/s15877/Local%20Plan%20Issues%20and%20Options%20report.pdf>

⁷⁶ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3809&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Issues and Option Consultation identified six potential strategic sites. The strategic matters which have or would have a significant impact on the City and its planning areas have been reviewed and updated for each iteration of the draft Local Plan. The current Pre-Submission Local Plan builds upon the strategic matters and policies identified at the Issues and Options Consultation (2017), Tipner Strategic Development Area Consultation (2019), Evidence Base Consultation (2019), and the Draft Local Plan Regulation 18 Consultation (2021) stages in conjunction with a new and updated evidence base. The Pre-Submission Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision. Based on this vision, six strategic objectives for the City have been identified, these being: • A healthy and happy City • A City rich in culture and creativity • A City with a thriving economy • A City of lifelong learning • A green City • A City with easy travel The Pre-Submission Local Plan 2024 and Pre-Submission Local Plan Addendum 2025 identifies the strategic issues in the Plan through the Local Plan chapters for: • Two core policies (PLP1 Design and PLP2 Climate Emergency) which provide the overarching framework for evaluating all development proposals in the City

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						• The allocation of seven strategic sites which are mission critical to achieving the Portsmouth 2040 Vision, as well as six site allocations. • Homes, including the housing target for the City, and policies on affordable housing, HMOs and Gypsies and Travellers • The Thriving economy, including the City's employment target, retail and town centres, and the cultural and visitor economy. • The Climate emergency, addressing matters of flooding, • Greening the City, relating to matters of green infrastructure, biodiversity, Solent Waders and Brent Geese sites, recreational disturbance on international nature designations, and nutrient neutrality in international nature designations • Infrastructure, through policies for movement and transport, infrastructure, electronic communications and utilities infrastructure, and community and leisure facilities. • Heritage, including policies for the historic environment, listed buildings, conservation areas and archaeology.
13.	L	In addition to the legally prescribed bodies does your Statement of Community Involvement and project plan identify any additional bodies / person(s) who you will engage with on strategic cross-boundary matters and who will be party to your Statement(s) of common ground?	NPPF para 27 and para 35	Y	• Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	The SCI⁷⁷ includes a list of the general consultation bodies in Appendix A and the specific consultation bodies to Portsmouth in Appendix B. The Council has prepared a number of Statements of Common Ground under the Duty to Cooperate, covered in further detail in Q14.

⁷⁷ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/statement-of-community-involvement/>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
14.	PM	Have you designed a template to record the progress made with the above bodies / person(s). This should document where effective co-operation is and is not happening throughout the plan making process, and the outcomes from engagement. This will also be required as evidence to demonstrate that you have met the Duty to Cooperate.	P&CPA Section 20 and Section 33A NPPF para 27 and para 35	Y	• Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements • Template documents	The Council continues to work closely with all relevant statutory bodies, including through the preparation of Statements of Common Ground (SCG). Table 2 of the Duty to Cooperate Statement⁷⁸ (2026) sets out the progress of the SCGs with Statutory Undertakers. The Council has prepared templates that it is using for its SCG with adjoining Authorities, statutory undertakers and site promoters. The SCG include outcomes from engagement and records points of agreement and disagreement. All finalised SCGs are published on the Council's website as part of the Core Document Library⁷⁹. As part of the preparation of the Pre-Submission PLP 2024 for Regulation 19, the Council has engaged with its neighbouring authorities regarding meeting the unmet housing need in Portsmouth and other cross boundary issues. Under the Duty to Cooperate, the Council prepared Statements of Common Ground with its neighbours as follows: East Hampshire District Council⁸⁰, Fareham Borough Council⁸¹, Gosport Borough Council⁸², Havant Borough Council⁸³, the Isle of Wight Council⁸⁴, and Winchester City Council⁸⁵. The

⁷⁸ <http://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Duty-to-Cooperate-Statement-March-2026.pdf>

⁷⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

⁸⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/Statement-of-Common-Ground-EHDC-PCC-July-2024.pdf>

⁸¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/June-24-Statement-of-Common-Ground-FBC-PCC-v1-Signed-FINAL.pdf>

⁸² <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/Statement-of-Common-Ground-GBC-PCC-July-2024.pdf>

⁸³ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Statement-of-Common-Ground-HBC-PCC-July-2024-HBC-signedFINAL.pdf>

⁸⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/IWC-PCC-IPS-Statement-of-Common-Ground-June-2024.pdf>

⁸⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Statement-of-Common-Ground-between-Portsmouth-and-Winchester-PCC-updated-October-2024-FINAL.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						SCGs set out the position of the Councils and their understanding on key issues and provide a clear and positive direction to inform ongoing plan-making. The key outcomes are included in the Duty to Cooperate (DtC) Statement. New SCGs with neighbouring authorities have been prepared with East Hampshire DC⁸⁶, Fareham BC⁸⁷, Gosport BC⁸⁸, Havant BC⁸⁹, Winchester CC⁹⁰ and South East Hampshire Local Authorities⁹¹ to support the submission of the Local Plan. Where responses to communications seeking to engage on strategic matters, including SCG, have not been forthcoming, the Council have taken steps to prompt the relevant organisations / bodies with follow up communications.
15.	PM	In line with your Local Development Scheme and project plan have you timetabled relevant meetings / briefings with the authorities senior management team and elected Members (including any relevant Cabinet / Committee) to ensure that there is support for the development of the local plan policies update and that any necessary permissions for publication are obtained?		Y	Any relevant local authority reports and decisions	Throughout the Local Plan review, the Council has engaged with the Local Plan Project Board, which meets regularly with senior officers across the Local Authority to discuss matters arising throughout the preparation of the LP. Weekly meetings have been held between the assistant director for Economy, Planning and Transport and the portfolio holder for Planning Policy & City Development (PP&CD). Opposition spokespeople have also been invited to these meetings. A Schedule of Changes to the Local Plan was prepared by officers and discussed with

⁸⁶ <http://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Feb-26-SCG-with-EHDC-Final.pdf>

⁸⁷ <http://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Feb-26-SCG-with-FBC-Final-signed.pdf>

⁸⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/FINAL_SCG_PCC_GBC_Feb-26.pdf

⁸⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Final_SCG_HBC_PCC_Feb-26_SIGNED.pdf

⁹⁰ http://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Final_SCG_PCC_WCC_Feb-26_Signed.pdf

⁹¹ https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Final_SCG_SEH_Mar-26.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						the portfolio holder and opposition spokespeople before submission. Following the Regulation 18 consultation in 2021, all Members of the Council were invited to the following Member workshops on the Local Plan: • 23 February 2023: priorities for the Local Plan, greening the City: green infrastructure & biodiversity net gain, climate change and housing: density, types, mix and affordable • 03 March 2023: Houses in Multiple Occupation, Portsmouth City Centre strategic site and Cosham strategic site • 08 March 2023: Economic development and priorities for the Local Plan • 19 July 2023: Initial findings of the Housing and Economic Development Needs Assessment • 27 September 2023: Feedback from advisory meeting with the Planning Inspectorate, nutrient neutrality, biodiversity net gain, housing need and the duty to cooperate • 25 October 2023: Houses in Multiple Occupation • 01 November 2023: Development strategy, levels of development and allocations • 23 January 2024: National changes to planning, housing & employment targets, allocations and HMOs Two briefings on the new draft PLP were held for all members after the local elections on 14 May 2024 and 22 May 2024. The purpose of these meetings was to explain the Local Plan to new members and liaise with

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						longstanding Members on any outstanding issues before Full Council on 28 May. The Council timetabled a number of Cabinet and Full Council meetings relating to the Local Plan policies update to ensure that there is support for the development of the local plan policies update and that any necessary permissions for publication are obtained: • (Special) Cabinet Meeting 27 July 2017: Local Plan Review Process/Issues and Options consultation document (Item 4)⁹² • Cabinet Meeting 5 February 2019: Portsmouth Local Plan Update & Tipner Strategic Development Area consultation document⁹³ (Item 6) • Cabinet meeting 27 July 2021: Approval for the publication of the draft Portsmouth Local Plan under Regulation 18⁹⁴ (Item 4) • Special Cabinet meeting 15 May 2024: Portsmouth Local Plan - Pre-Submission⁹⁵ (Item 4) • Extraordinary Full Council meeting 28 May 2024: Pre-Submission Portsmouth Local Plan⁹⁶ (Item 5) • Extraordinary Cabinet meeting 29 April 2025: Local Development Scheme⁹⁷ (Item 4)

⁹² <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3809&Ver=4>

⁹³ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4068&Ver=4>

⁹⁴ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4717>

⁹⁵ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5582&Ver=4>

⁹⁶ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5603&Ver=4>

⁹⁷ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5908&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						• Cabinet meeting 28 October 2025⁹⁸ (Item 6) • Full Council meeting 11 November 2025⁹⁹ (Item 10) The Council held briefings for political parties on the LP as part of the production of the Regulation 19 PLP in 2024, which took place on: • 20 February 2024: Liberal Democrats • 27 February 2024: Portsmouth Independents Party • 14 March 2024: Labour Following the decision by Cabinet to start work on the PLP Addendum on 29 April 2025, the following meetings were held: • 20 May 2025: All member workshop to guide the new workstream. • 11 September 2025: All Member briefing session on the Local Plan Addendum that provided Members the opportunity to discuss the Local Plan informally and ask officers questions.

⁹⁸ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=5975&Ver=4>

⁹⁹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5848&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
16.	L	Have you prepared a Scoping Report for the development of your Sustainability Appraisal to inform the update of your plan policies? Have you included a proposed framework for testing local plan policies update options and alternatives using the baseline information and an identified set of sustainability objectives? Have you incorporated the requirements of the Strategic Environmental Assessment?	P&CPA Section 19 and Section 39 The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) The European Directive 2001/42/EC NPPF Para 32	Y	• Local Development Scheme • Sustainability Appraisal Scoping document • Sustainability Appraisal report	The Council published a draft Sustainability Appraisal (SA) Scoping Report¹⁰⁰ in March 2017, which established a baseline of existing environmental, social and economic characteristics and sets out in more detail the areas the SA will cover. The Scoping Report identified ten themes for inclusion in the SA and developed the framework for the SA, including how it will test local plan policies and alternatives, and the evidence base to inform it. It includes a full baseline summary for each identified SA objectives. In August 2017, the Council produced an 'Interim' Sustainability Appraisal¹⁰¹ of the policy options presented in the Portsmouth Local Plan 'Issues and Options' consultation document (July 2017). An updated Interim SA Report¹⁰² was prepared and published alongside the draft Local Plan under the draft Local Plan Regulation 18 consultation in September 2021. The scope of the SA had evolved since the 2017 consultation through the emergence of new evidence. The report was also updated to reflect a number of national policy changes and evidence updates. These updates are detailed in Appendix B of the Interim SA Report. This updated SA report tested Regulation 18 policy options and alternatives. A further update of the SA¹⁰³ was published in July 2024 to support the Pre-Submission Local Plan 2024 under

¹⁰⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Sustainability-Appraisal-scoping-report.pdf>

¹⁰¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Issues-and-Options-sustainability-appraisal.pdf>

¹⁰² https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Portsmouth-LDP-SA_Interim-Reg-18-SA-Report_publication-draft_140921_compressed.pdf

¹⁰³ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Appendix_2_a_SA_Reg-19-SA.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Regulation 19 stage, testing policy options proposed at this stage, and reasonable alternatives. Both the Local Plan and its SA meet the requirements of the Strategic Environmental Assessment Directive. An updated SA report¹⁰⁴ has been prepared to support the Pre-Submission PLP 2025 and accompanies the Addendum for consultation in winter 2025. As set out in Q2, PCC has decided to reduce the development at Tipner West including the removal of the marine hub proposal. Revised proposal options for development of PLP3: Tipner West are presented and assessed as alternatives in the SA 2025. The updated SA 2025 also makes a number of changes to address comments made on the SA 2024 during the Pre-Submission consultation in Summer 2024 (Appendix C). The Strategic Environmental Assessment has been integrated with the Sustainability Appraisal at each stage of its production.
17.	L	Have you consulted the statutory environment consultation bodies, and other interested parties, on the scope and level of detail of the environmental information to be included in the Sustainability Appraisal report?	The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)	Y	• Statement of Community Involvement • Sustainability Appraisal report scoping document • Sustainability Appraisal report • Copies of the consultation letters sent to, and any responses from, the bodies	Informal comments on the draft SA Scoping Report were invited during May and June 2016 to address any key oversights and aid the development of the Scoping Report. A formal five-week consultation followed from December 2016 to January 2017, closing on 10th January 2017. The draft document was reviewed following the consultation responses and comments were taken account of in the final draft of the Scoping Report ¹⁰⁵ .

¹⁰⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

¹⁰⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Sustainability-Appraisal-scoping-report.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Scoping Report was subject to consultation with the statutory consultation bodies (Environment Agency, Natural England and English Heritage) as required by the Strategic Environmental Assessment Directive.
		Stage C: Developing the update to your local plan policies				
18.	L	Have you collected in a presentable format the relevant baseline information that will inform and evidence an update to your plan? This may include evidence commissioned by third parties.	P&CPA Section 13 and Section 20	Y	• Baseline technical data • Commissioned reports and studies • Authority Monitoring Report	The baseline and supporting evidence documents for the preparation of the draft Local Plan are published on the Council's Portsmouth Local Plan evidence page in the Core Document Library ¹⁰⁶ . The Local Plan Core Document Library contains all baseline and supporting evidence and forms the examination library for the submission of the Local Plan. This has been published alongside the Pre-Submission PLP.
19.	L	Have you undertaken early engagement with stakeholders to help develop spatial options, particularly on strategic cross-boundary matters? Have you ensured that you are keeping a continual log of engagement for your Duty to	P&CPA Section 20 and Section 33A NPPF para 27 and para 35	Y	• Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	The Council has engaged with stakeholders since the beginning of the LP review and update. Early engagement details are covered within the summary documents for the Portsmouth Local Plan

¹⁰⁶ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Cooperate Statement of Common Ground?				Issues and Options Consultation (2017)¹⁰⁷; Tipner and Horsea Consultation (2019)¹⁰⁸; Evidence Base Update Consultation (2019)¹⁰⁹; and the Local Plan Regulation 18 Draft Consultation (2021)¹¹⁰. These published consultation summary documents include details of the comments received to the consultations as well as the Council's response. The summary of responses received to the summer 2024 Regulation 19 consultation and the Council's response are published in Appendix 3 of the Regulation 22 Consultation Statement as part of the supporting evidence. The consultation statement has been updated following the Pre-Submission PLP Addendum consultation in winter 2025 and submitted for examination alongside the PLP. The summary of the responses received to the winter 2025 Regulation 19 consultation and the Council's response are published in Appendix 4. The Council has kept a continual log of engagement and agreed Statements of Common Ground with a number of neighbouring authorities and statutory undertakers, which is set out within the Duty to Cooperate Statement. The Council is also working on SCGs with all the site promoters for the strategic sites and site allocations in the Pre-Submission PLP 2024 and Pre-Submission PLP

¹⁰⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-Local-Plan-summary-of-responses.pdf>

¹⁰⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-and-Horsea-Island-Consultation-Summary.pdf>

¹⁰⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Evidence-Consultation-Summary.pdf>

¹¹⁰ <https://democracy.portsmouth.gov.uk/documents/s37180/Appendix%201%20Draft%20Reg%2018%20consultation%20response%20summary%20report%20v2.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Addendum 2025. These provide important evidence on the feasibility and viability of these allocations. Finalised versions of SCGs are published on the Core Document Library¹¹¹. The Partnership for South Hampshire (PfSH) is the main forum for progressing cross boundary matters in South Hampshire. The City Council has worked collaboratively with many other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in the PLP. Evidence of ongoing engagement was recorded and is provided in the Interim Duty to Cooperate Statement¹¹² (2025), published alongside the Regulation 19 Pre-Submission PLP Addendum.
20.	L	Have you drafted policies / policy options and alternatives based on evidence and engagement? Do the options serve a clear purpose, have they been prepared positively and written in a clear manner and unambiguous?	NPPF para 15 to 34	Y	• First draft plan • Sustainability Appraisal report • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	A number of policy options were first set out and consulted upon in the Issues and Options Consultation (2017)¹¹³. The possible options for the regeneration of the Tipner and Horsea areas were published and considered as part of the Tipner and Horsea Consultation (2019)¹¹⁴. In the Regulation 18 draft Portsmouth Local Plan¹¹⁵ and its Sustainability Appraisal (2021), the Council considered a number of draft policies/policy options and alternatives.

¹¹¹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

¹¹² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Duty-to-Cooperate-Statement-November-2025.pdf>

¹¹³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Issues-and-Options.pdf>

¹¹⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf>

¹¹⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The draft policies produced in the Regulation 18 Plan were updated for the Regulation 19 Local Plan 2024 and were consulted on in July-September 2024. The Council has produced a document setting out the key changes to the new draft Local Plan between Regulation 18 and Regulation 19. This iteration of the Local Plan was informed by a further appraisal for reasonable alternatives and policy options, as set out in the updated Sustainability Appraisal (2024). The SA 2024 supports the Pre-Submission Plan and was published for consultation in July. As detailed above in Q16, a number of changes were made to the SA in order to address comments made on the SA during the Pre-Submission consultation. . Chapter 5 of the SA 2024 is about establishing reasonable alternatives. It explains how the policy context and evidence base was drawn on to establish reasonable alternatives for appraisal. Alternatives have been previously identified and assessed through the SA process. Options were explored in the: • Issues and Options SA Report (2017) accompanying the Portsmouth Local Plan Issues and Options document for consultation in 2017; and • Interim SA Report (2021) accompanying the Regulation 18 draft Local Plan for consultation in 2021. The SA tested the overall strategy, including City-wide housing growth options and for employment growth, as

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						well as a series of detailed policy options for houses in multiple occupation (HMOs), Affordable housing / First homes, and Biodiversity Net Gain (BNG). Chapter 6 appraises the findings for reasonable alternatives for the housing growth options, employment growth options, and policy options. As set out in Q2, PCC prepared a PLP Addendum with an alternative policy for Tipner West that does not harm international nature conservation designations in any way that cannot be mitigated. A series of optioneering and evaluation workshops were conducted by PCC as the LPA and the PCC Promoter team, in consultation where necessary with statutory and non-statutory consultees and third-party expert consultants between April-May 2025 to assess three high-level options (residential led; employment led; 50:50 split) for the new PLP3 for Tipner West. A fourth option (residential only) was recommended for exploration, but was ultimately not taken forward, cognisant of the intentions of the City Deal grant and Member aspirations for the site. The outcome of the optioneering process was that a hybrid position between options 1 and 3 was agreed. A detailed explanation of the options assessment for the new Tipner West policy is set out in chapter 4 of the Tipner West Topic Paper¹¹⁶. The four options for Tipner West were appraised in the SA (2025). Section 4 of the SA 2025¹¹⁷ appraises the reasonable alternatives for the revised PLP3: Tipner West allocation. Section 5 explains the Council's

¹¹⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Topic-Paper-TW-siteNov2025-vFINAL.pdf>

¹¹⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						preferred approach, considering the appraisal of reasonable alternatives in Section 4, and bringing it together with available evidence and Council and wider priorities. Part 2 of the SA 2025 presents an appraisal of the Pre-Submission PLP 2024 and Pre-Submission PLP Addendum 2025.
21.	L	Have you taken account of the NPPF requirements for plan content and the Government's planning policy for traveller sites? At the time of publication this was included in the August 2015 DCLG Planning Policy for traveller sites. This policy must be taken into account in the preparation of development plans.	NPPF Planning policy for traveller sites, DCLG August 2015, updated December 2023	Y	• Evidence based documents • First draft plan • Consultation statement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	The Pre-Submission Local Plan has taken account of the NPPF requirements for plan content and the Government's planning policy for traveller sites. The Gypsy and Traveller Accommodation Assessment (2024)¹¹⁸ forms part of the Local Plan evidence base and has been undertaken in accordance with updated Government planning policy for traveller sites. This includes the 2023 update to the Government's planning policy for traveller sites¹¹⁹ to reintroduce those who have ceased to travel permanently under the Government's definition, following the Lisa Smith judgement in 2022. The Gypsy and Traveller Accommodation Assessment's methodology and assessment of need takes account of this update. A Consistency with National Topic Paper¹²⁰ (November 2025) has been prepared to explain how changes to national planning policy have impacted the preparation of the PLP and demonstrates that the PLP is consistent with national policy,

¹¹⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Portsmouth-GTAA-Final-Report.pdf>

¹¹⁹ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

¹²⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/FINAL-National-Consistency-Topic-Paper.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
22.	L	Have you considered plan production processes set out within the NPPF, including: Plan making provisions set out in section 3 – para 15-38	NPPF	Y	- Evidence based documents - First draft plan - Consultation statement - Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	The Pre-Submission Local Plan 2024 and Local Plan Addendum 2025 and its supporting evidence base have considered the plan production processes set out within the NPPF since the start of the production of the new Local Plan. This has included keeping up to date with national changes. As stated in Q21, a Consistency with National Topic Paper (November 2025) has been prepared to explain how changes to national planning policy have impacted the preparation of the PLP and demonstrates that the PLP is consistent with national policy, We have considered the plan making provisions set out in paragraphs 15-38 of the NPPF as follows: - The PLP2024 and PLP Addendum 2025 has been positively prepared with the objective of delivering sustainable development and achieving the social, environmental and economic objectives in Portsmouth. It seeks to guide development in the City up to 2040, and to achieve the Imagine Portsmouth 2040 Vision adopted by the Council in 2021. The Plan explicitly sets out a number of core, strategic, and development management (non-strategic) policies. Each chapter covers an area of key interest, these being: strategic sites; site allocations; homes; thriving economy; the climate emergency; greening the City; infrastructure; and heritage. - A policies map has been prepared to show: the boundaries for all allocations in the City; where specific policies, such as towns and local centres apply and where practicable, other planning constraints, for example, international,

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						national and local nature conservation designations. PCC has worked collaboratively with many other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in the Pre-Submission Local Plan, which is evidenced in the interim Duty to Cooperate Statement. The Plan reflects effective and on-going cooperation and joint working between PCC and other relevant bodies, which has been maintained throughout the preparation of the Plan and its evidence base. To demonstrate this engagement, the Council has prepared a number of Statements of Common Ground documenting the cross-boundary matters addressed and progress in cooperating to address the matters. The Regulation 19 Pre-Submission PLP 2024 and PLP Addendum 2025 are supported and informed by a robust, extensive and detailed evidence base that has informed the preparation of the PLP policies and published in the Council's Core Document Library, which demonstrates how the plan making provisions of the NPPF have been considered. This evidence base includes the Habitats Regulations Assessment; the Sustainability Appraisal; a Housing and economic development needs Assessment (HEDNA) and a Housing and Economic Land Availability Assessment (HELAA). Updated versions of these documents have been prepared to take into account latest evidence and are published alongside the Pre-

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Considering transport issues at the earliest stages of plan production – para 109				Submission PLP Addendum for consultation in winter 2025. - This also includes the preparation of the Strategic Transport Assessment (STA) and Strategic Flood Risk Assessments (SFRA), which have supported the production of the LP policies for allocating sites for development. Supporting the PLP Addendum 2025, an updated SFRA Level 2¹²¹ has been prepared to provide information on the risk of flooding to strategic sites and site allocations. An Interim Strategic Transport Assessment Addendum¹²² (ISTAA) has also been prepared which provides supplementary transport evidence, assesses the impact of growth and allocations in the PLP2024 and PLP Addendum 2025, and updates the trigger point assessment. We have considered transport issues at the earliest stages of plan production set out in paragraph 109 of the NPPF as follows: - Highways has been an important consideration throughout the production of the PLP. The Strategic Transport Assessment (STA) was undertaken by SYSTRA on behalf of PCC. This STA was used to inform both the overarching policy on movement and transport (Policy PLP47) and used to inform site specific policy criteria relating to highways for strategic and allocated sites (where required). The Regulation 18 Local Plan was informed by a previous STA.

¹²¹ https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/PCC-Level-2-SFRA_Version-5-18-Nov-25.pdf

¹²² <https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/Portsmouth-Local-Plan-Interim-Strategic-Transport-Assessment-Addendum-041225.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						This was superseded by the updated February 2025 version. PCC commissioned a further STA update to take into account changes proposed in the Addendum. The ISTAA provides supplementary transport evidence to support the PLP Addendum 2025, updates the local and strategic modelling assessment to corroborate the findings of the full STA (Feb 2025) and confirm that conclusions and proposed mitigation remain valid. It assesses the impact of growth and allocations in the PLP2024 and PLP Addendum 2025 and updates the trigger point assessment in Chapter 6. • Transport issues have been considered from the earliest stages of preparing the Plan so that the potential impacts of development on transport networks can be addressed. This is particularly important for Portsmouth with its constrained island geography. The Transport Assessment has looked at the impact of the strategic sites, site allocations, and the identified sites in the Pre-Submission Plan 2024 and Local Plan Addendum 2025 on the transport network and tests measures to mitigate severe negative impacts. It proposes mitigation where there is deemed to be a detrimental impact on specific junctions. Appropriate mitigation measures include targeted improvements to walking, cycling and highway infrastructure and necessary changes to local and strategic highway infrastructure. • Transport issues have been considered so that opportunities from existing or proposed transport infrastructure, and changing transport

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						technology and usage, are realised. The TA takes into account all permitted schemes on the highways network, including those in the Bus Service Improvement Plan (BSIP) and Local Cycling and Walking Infrastructure Plan (LCWIP). • Transport issues have been considered so that opportunities to promote walking, cycling and public transport use are identified and pursued. Strategic Policy PLP47: Movement and Transport states development proposals should contribute to the protection and/or delivery of a network of high-quality walking and cycling routes throughout the City including those in the LCWIP. The Plan seeks to support the objectives of the Local Transport Plan 4; two of these objectives are to prioritise walking and cycling, and to transform public transport. • Transport issues have been considered so that the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains. The results of the TA have informed the Emissions Based Assessment which supports the Local Plan. The Pre-Submission Plan includes Policy PLP36: Air Quality and Pollution, which seeks for development proposals to maximise opportunities to improve air quality or mitigate negative impacts through traffic and travel management.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		- Aligning strategies and investments – para 111 - Considering changes in the demand for land – para 126				- Transport issues have been considered so that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places. Any transport measures proposed should align with safety, parking standards, integrate with biking and walking networks. We have considered aligning strategies and investments as set out in paragraph 111 of the NPPF as follows: - Policies in the Pre-Submission Local Plan have been prepared with active involvement from the Local Highways Authority and National Highways. The STA takes into consideration committed schemes in the Local Transport Plan 4, which is the Council's overarching strategy and policies for development of the transport network in Portsmouth until 2038, and the LCWIP, which has informed the preparation of the Plan policies. Specific schemes identified in the STA that will be required to mitigate Local Plan growth are also reflected in the Infrastructure Delivery Plan, to ensure that strategies and investments for supporting sustainable transport and development patterns are aligned. We have considered changes in the demand for land as set out in paragraph 126 of the NPPF as follows: - The Council has taken a proactive role in identifying and helping to bring forward land that

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Discussing the strategic location of housing growth and				may be suitable for meeting development needs, including sites on brownfield land registers or held in public ownership. - The strategic sites and site allocations have come forward through calls for sites submissions, which have in turn informed the sites identified in the HELAA. The Pre-Submission Plan is supported by an updated HELAA which informed the decisions on strategic locations for housing growth and the strategic sites and site allocations. The HELAA has been updated in 2025 and provides updated evidence for the strategic site allocation and site allocation policies included in the Local Plan Addendum. - Many of the strategic sites and sites allocations in the Pre-Submission Local Plan 2024 and Local Plan Addendum 2025 are in Council ownership or partly Council-owned, namely: - Tipner West - Tipner East (partly) - Lakeside North Harbour - Portsmouth City Centre (partly) - Somers Orchard - Port Solent (PCC own the freehold and the long-term lease is owned by a private company) - Horsea Island Strategic Open Space The Council remains in continuous discussion with site promoters, landowners and developers to enable the deliverability of sites. Although we have discussed the strategic location of housing growth with our neighbours in South

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		any proposed changes to Green Belt boundaries with neighbouring authorities – para 147 Applying a sequential, risk-based approach to the location of development to avoid flood risk to people and property – para 172				Hampshire, we have not discussed any proposed changes to Green Belt boundaries with neighbouring authorities as set out in paragraph 147 of the NPPF as follows: - There is no Green Belt within or around the City of Portsmouth. Therefore paragraph 147 of the NPPF is not relevant. We have applied a sequential, risk-based approach to the location of development to avoid flood risk to people and property as set out in paragraph 167 of the NPPF as follows: - The Pre-Submission Local Plan 2024 was informed by both a Level 1 and Level 2 SFRA. These have also been used to inform the Portsmouth City Council Sequential and Exception test which seeks to take a sequential, risk-based approach to the location of strategic and allocated sites within the Local Plan. The SFRA Level 2 and Sequential and Exception Test have been updated as part of the preparation of the Local Plan Addendum 2025. - The Council has prepared a sequential and exception test document separately to the SFRA Levels 1 and 2. It is written in collaboration between PCC and the Environment Agency. The sequential test is supported by the data provided within the up-to-date Level 1 SFRA, completed by AECOM in August 2023. Where development cannot be located in areas at lowest risk of flooding, the SFRA Level 2 has informed the application of the exception test. - The sequential test will steer new development to areas at lowest risk of flooding, accounting for

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Allocating land with the least environmental value – para 188				all sources of flooding, taking into account climate change. The exception test demonstrates that the proposed strategic sites and site allocations, or sites otherwise identified in the Pre-Submission Plan 2024 that are located in higher flood risk areas (due to a lack of available and suitable alternative sites in lower flood risk areas) that development will provide wider sustainability benefits to the City, that outweigh the risk of flooding, will be safe for its lifetime and can be delivered without increasing flood risk elsewhere. - All strategic and allocated sites will need to be supported by a robust, site specific flood risk assessment and a sequential approach to land use planning must be applied to each site. We have considered allocating land with the least environmental value as set out in paragraph 188 of the NPPF as follows: - The sites allocated or identified in the Pre-Submission Local Plan 2024 and Local Plan Addendum 2025 are supported by robust evidence base, most notably the HELAA - the Council's main evidence based study of land supply. PCC has considered allocating land with the least environmental or amenity value, and many of the strategic sites and site allocations are located on brownfield land. However, due to the City's constrained island geography, there are no alternative sites for development, therefore some of the strategic sites are highly constrained. The Council has produced a Site

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Allocations Topic Paper¹²³ explaining the rationale behind the sites allocated in the Local Plan. • Strategic Policy PLP39: Biodiversity distinguishes between the hierarchy of site designations that will apply in the consideration of development proposals. This includes internationally protected sites; nationally protected sites; irreplaceable habitats; locally protected sites; and outside of designated sites. • The Plan takes a strategic approach to maintaining and enhancing networks of habitats and green infrastructure in Strategic Policy PLP38: Green Infrastructure. The Green Infrastructure Background Paper identifies a variety of open spaces in the City that form the foundations of its green infrastructure network and proposes a green grid.
23.	L	Have you developed a clear and robust framework that will allow you to consistently monitor the implementation and impact of the policies in the plan and to enable a review to be triggered where necessary?	P&CPA Section 13 and Section 35 T&CPA Regulation 34 The Environmental Assessment of Plans and Programmes Regulations	Y	• Sustainability Appraisal • Authority Monitoring Report • Reports or documents setting out the appraisal and monitoring framework	To consistently monitor the implementation and impact of the policies in the Plan, and to enable a review to be triggered where necessary, the Pre-Submission Local Plan includes a monitoring framework (Chapter 12). The monitoring framework is amended by the Pre-Submission Local Plan Addendum 2025 for the Addendum policies. Monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Regular monitoring over the plan period through the targets and indicators will enable the Council to assess

¹²³ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Allocations-Topic-Paper-RS-Nov-2025-PDF-FINAL-VERSION.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
			2004 (as amended) NPPF Para 31, 33, 79, 126			the impact of the Plan, and whether its vision, objectives and policies are being achieved. Careful consideration has been taken to the formation of the indicators to ensure that they are specific, measurable, achievable, relevant, and time-bound (SMART) and can therefore be monitored on a yearly basis. To monitor whether the Local Plan is effective and meeting the objectives set out in the Plan, and to enable understanding of any triggers for that could lead to a review, the Council will continue to produce an Authority Monitoring Report (AMR) based on the monitoring framework. The policies in the PLP have been developed so that they can be monitored within the AMR.
24.	L	Have you undertaken a Habitats Regulations Screening Assessment to determine whether the update to the local plan is likely to have a significant effect on a European site or a European offshore site (either alone or in combination with other plans or projects)?	The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 92/43/EEC	Y	•Habitats Regulations Assessment screening report •Habitats Regulations Assessment	The Local Plan is supported by a Habitats Regulations Assessment (HRA). The objective of this assessment is to identify any aspects of the Plan considered likely to have a significant effect on a protected habitats site either individually or in combination with other plans or projects. The Council undertook an initial Habitats Regulations (HRA) Screening Assessment¹²⁴ in August 2017 as part of the Issues and Options consultation in Summer 2017. This provided information on whether the new Local Plan would have a likely significant effect on any International site. It accompanied the Local Plan Issues and Options Consultation document¹²⁵ (2017).

¹²⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Issues-and-Options-Habitats-regulation-assessment.pdf>

¹²⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Issues-and-Options.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Further detail on the results of the HRA are covered in Q26 and Q42.
25.	L	Have you consulted the relevant “nature conservation body” on your Habitats Regulations Screening Assessment and had regard to their representations? Have you also consulted, if considered appropriate, other relevant organisations?	The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 92/43/EEC	Y	• Habitats Regulations Assessment screening report • Habitats Regulations Assessment • Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	Natural England has been consulted throughout the plan making process, including all stages of HRA and the Council has carefully considered their representations. An updated HRA (2025) has been prepared, which includes the screening assessment, and published for consultation alongside the Pre-Submission Local Plan Addendum in winter 2025. The Council is has prepared a new Statement of Common Ground under the Duty to Cooperate with Natural England¹²⁶, which will build on their response to the PLP Addendum.

¹²⁶ <http://www.portsmouth.gov.uk/wp-content/uploads/2026/02/PCC-NE-SoCG-Feb-26.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
26.	L	Did the Habitats Regulations Assessment screening assessment determine that the plan is likely to have a significant effect on a European site or a European offshore site? If so you <u>must</u> undertake an appropriate assessment of the implications of the plan (as part of your Habitats Regulatory Assessment (HRA)) for the Plan's policies and site(s) within the context of the European site's conservation objectives.	The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 92/43/EEC	Y	• Habitats Regulations Assessment screening report • Habitats Regulations Assessment • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	An HRA Screening Assessment was undertaken at the Issues and Options stage of the draft Local Plan process¹²⁷. and at subsequent Regulation 19 stages of consultation. The majority of potential allocations were screened out of the requirement for Appropriate Assessment on the basis that they would not have likely significant effects on any Internationally designated sites. A number of larger allocation sites closer to the coastal SPA/Ramsar sites were screened in as having a likely significant effect on the European and International sites in view of a range of potential impacts including: • Direct and permanent loss of supporting habitat (and potentially SPA habitat) • Recreational pressure on the SPA / Ramsar and supporting habitats (residential allocations only) • Disturbance impacts during construction • Disturbance impacts during operation, and • Air quality impacts during construction and operation (mainly employment allocations) In August 2021, a Regulation 18 HRA¹²⁸ was carried out for the draft Regulation 18 Local Plan. The Regulation 18 HRA screened in the emerging Local Plan for likely significant effects and carried out an Appropriate Assessment.

¹²⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Issues-and-Options-Habitats-regulation-assessment.pdf>

¹²⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/PLP-HRA_150921_Final_compressed.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						In April 2024, a Regulation 19 HRA was carried out for the PLP 2024¹²⁹, building on the Regulation 18 HRA. Section 5 of the Regulation 19 HRA (2024) screened the PLP 2024 for likely significant effects, assessing all policies in the emerging PLP 2024 for impact pathways linking to Habitats sites. This screened in a number of likely significant effects including the permanent habitat loss at Tipner West & Horsea Island East and determined that an Appropriate Assessment was required. Section 6 of the 2024 HRA was the Appropriate Assessment. Section 7 concluded that with the amendments recommended in section 6 and included in the Local Plan, it was possible to conclude that no elements of Pre-Submission PLP2024 would have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects, except for the redevelopment of Tipner peninsula as set out in Policy PLP3: Tipner West & Horsea Island East. With this policy remaining in the Local Plan it was therefore necessary for the derogation tests referenced in Chapter 2 to be explored. Section 8 of the 2024 HRA therefore assessed Policy PLP3 against the necessary derogations to consider whether the Local Plan could be adopted with Policy PLP3 as written. The overall conclusions of section 8 was that sufficient information exists at the Local Plan level to be able to conclude that the Tipner West and Horsea Island East (Policy PLP3) that a) there are no

¹²⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PLP_HRA-2024_FINAL.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						feasible alternatives to this allocation that would be less damaging to the integrity of the SPA/Ramsar site while still meeting the objective set out in section 8.1 of this HRA as expressed in the Local Plan, b) there are IROPI as to why the Local Plan should be adopted with Policy PLP3 intact despite the harm caused to Portsmouth Harbour SPA/Ramsar site and c) there is sufficient suitable land identified for delivery of compensatory measures to conclude that suitable compensation can be secured at the planning application level once the quantum and nature of the required compensatory habitat is known. Two unlawful Regulation 107(3) IROPI Opinions have been issued and then withdrawn by the Secretary of State for Housing Communities and Local Government. Notwithstanding the fact that the Secretary of State's IROPI opinions were both unlawful, the City Council decided, on a pragmatic basis and cognisant of the pressing 12 June 2026 deadline for submission of a Local Plan for examination, to prepare a version of Policy PLP3 that had no adverse impact on European and internationally designated sites, through a Local Plan Addendum. This approach was agreed by Cabinet in April 2025. A new HRA was prepared to support the Pre-Submission consultation on the PLP Addendum in 2025 and its new Policy on Tipner West. As the new Policy PLP3 does not cause any adverse impacts on international conservation designations that cannot be mitigated, the 2025 HRA does not include the derogation tests. Since the HRA process must consider the Local Plan as a whole, an update to the 2024 HRA has been produced

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						rather than a separate addendum. Section 5 of the HRA Update for the Addendum¹³⁰ is the Test of Likely Significant Effects which assesses for potential impact pathways linking to Habitats sites. Section 6 covers the Appropriate Assessment. Section 7 sets out the conclusions of the Appropriate Assessment and recommendations. The answer to Q42 addresses the Appropriate Assessment undertaken as part of the HRA process.
27.		Have you carried out an Equalities Impact Assessment?	Equality Act 2010	Y	• Equalities Impact Assessment	The Council has carried out several Equalities Impact Assessments throughout the preparation of the PLP. The Council completed a preliminary Equalities Impact Assessment¹³¹ (EqIA) to accompany the July 2017 Cabinet paper for the commencement of the Local Plan review. The preliminary EqIA determined the Local Plan review was likely to have a positive effect on all groups in society given its aim to drive sustainable development, economic development and deliver positive environmental impacts.

¹³⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

¹³¹ <https://democracy.portsmouth.gov.uk/documents/s15878/Appendix%201%20-%20Preliminary%20Equality%20Impact%20Assessment.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Following the consultation, a full EqIA¹³² was prepared in December 2017. An updated preliminary EqIA¹³³ was prepared for the Portsmouth City Local Plan consultation and Tipner Strategic Development area consultation in February 2019, followed by a full EqIA¹³⁴ in July 2019. An updated EqIA through the form of an Integrated Impact Assessment (IIA) was prepared in May 2024¹³⁵ for the PLP 2024 and September 2025¹³⁶ for the PLP Addendum 2025. The categories and questions in the assessment are based on the Council's priorities and strategies. The IIA consists of an EqIA and consideration of the impact of the Local Plan on a number of issues in Portsmouth including crime, air quality and the economy. Further detail on the outcome of the IIA is included in the answer to Q43.
28.		Have you considered combining the Sustainability Appraisal, Equalities Impact Assessment and potentially Habitats Regulations Assessment as part of an Integrated Impact Assessment that is developed and updated alongside the plan in order to	Equality Act 2010	Y	•Habitats Regulations Assessment screening report •Habitats Regulations Assessment •Equalities Impact Assessment	The Sustainability Appraisal, Integrated Impact Assessment and Habitats Regulations Assessment documents have been prepared separately by the Council. The HRA is particularly important for the PLP, because of the large number of international conservation designations surrounding the island city. There is a separate PCC corporate template for Integrated Impact Assessments that includes an Equalities Impact Assessment.

¹³² <https://democracy.portsmouth.gov.uk/documents/s17154/Portsmouth%20Local%20Plan%20Issues%20and%20Options%20EIA%20Appendix%203.pdf>

¹³³ <https://democracy.portsmouth.gov.uk/documents/s21618/Local%20Plan%20Update%20-%20Appendix%204%20Equalities%20Impact%20Assessment.pdf>

¹³⁴ <https://democracy.portsmouth.gov.uk/documents/s23502/Local%20Plan%20Appendix%203%20-%20consultation%20EqIA.pdf>

¹³⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Appendix_5_Integrated-Impact-Assessment-IIA.pdf

¹³⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/KD16_Integrated-Impact-Assessment.IA745854637.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		inform its options? This may not be appropriate in all instances.				
29.	L	Have you assessed the draft plan / policy options against relevant soundness and quality measures?	NPPF Para 35 to 36	Y	● Draft plan / policy options ● Duty to Cooperate Statement(s) of Common Ground ● Local Plan Form and Content Checklist (see Part 2 of this Toolkit) ● Local Plan Soundness and Quality Assessment (see Part 4 of this Toolkit)	The Council has prepared and assessed the Local Plan update with regard to matters of soundness and legal compliance. The Local Plan Soundness and Quality Assessment (Soundness Self Assessment Toolkit) undertaken for the Pre-Submission Local Plan 2024¹³⁷ and the Pre-Submission Local Plan Addendum¹³⁸ are available on the Core Document Library, The Council has undertaken consultation with statutory bodies to inform the production of a sound plan. A number of revisions were made to the Pre-Submission Local Plan 2024 as a result of the Soundness and Quality Assessment, including the removal of Policy S4: Cosham from the draft Regulation 19 Plan, previously published in the Regulation 18 Plan due to deliverability and explanation of thresholds used in draft policies. Additionally, PCC has had regard to soundness by including alterations to promote positive rather than negative wording, or to avoid ambiguity. The Council has prepared a document¹³⁹ which sets out the key changes to the Plan from Regulation 18 to Regulation 19, including reasons for new policies in the

¹³⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Soundness-Quality-Assessment-of-the-Regulation-19-Pre-Submission-Portsmouth-Local-Plan-PDF.pdf>

¹³⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf>

¹³⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/Key-changes-from-Regulation-18-to-19.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Regulation 19 Local Plan 2024 and reasons for policies not carried forward to the Plan from the Regulation 18 draft Plan. This provides a clear audit trail from the Portsmouth Local Plan 2038, which was published for consultation under Regulation 18 in September 2021 to the Pre-Submission Portsmouth Local Plan 2024, published for consultation in July 2024.
30.	L	Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map? If yes, have you prepared a submission policies map?	T&CPA Regulations 5(1) (b), 9 (1), 17 & 22(1)	Y	• Submission policies map • Brief statement if a submission policies map is not required	The Council has prepared a Policies Map¹⁴⁰, which illustrates how the policies in the Plan will apply. The Policies Map shows the boundaries for all allocations in the City. It shows where specific policies apply geographically, such as town and local centres. It also shows where practicable, other planning constraints, for example international, national and local conservation designations. To support the PLP Addendum 2025, Policy Map extracts for three policies: Tipner West, Horsea Island Strategic Open Space and Fratton Park & the Pompey Centre have been prepared.
31.	L	Is the local plan policies update consistent with any other adopted Local Plan Documents for the area?	T&CPA Regulation 8(3) and (4)	Y	• Local Plan and relevant background papers	The Portsmouth Local Plan will form the core part of Portsmouth's statutory Development Plan, in line with the T&CPA Regulations and national planning policy. The development plan documents and policies that it supersedes are detailed in the response to Q32 below. Adopted minerals and waste plans and the 'made' Milton Neighbourhood Plan also form part of the development

¹⁴⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/A0-Policies-Map.pdf> , Sheet 1: https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/A0-Policies-Map_Town_Centres-Sht1.pdf , Sheet 2: https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/A0-Policies-Map_Town_Centres-Sht2.pdf , Residential Density: https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Local_Plan_Policies_Map_Residential-Density.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						plan for Portsmouth. The Pre-Submission Local Plan is consistent with the adopted Hampshire Minerals and Waste Plan. Footnote 16 of the NPPF states that neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.
32.	L	Is the local plan policies update intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?	T&CPA Regulation 8(5)	Y	Local Plan	The Portsmouth Local Plan supersedes the following development plan documents and all their policies: - Saved policies from the Portsmouth City Local Plan 2001-2011 - The Portsmouth Plan (Portsmouth's Core Strategy) 2012 - Somerstown and North Southsea Area Action Plan (AAP) 2012 - Southsea Town Centre AAP 2007 Appendix 1 of the Pre-Submission Local Plan 2024 lists the policies that will be superseded by the Plan and what they will be replaced by.
33.	L	Is the local plan policies update (if a London Borough or Mayoral DC) in general conformity with the spatial development strategy?	P&CPA section 24	N/ A	- Letter from Mayor of London/ Mayoral Development Corporate - Local Plan and relevant background papers	As Portsmouth is not a London Borough or Mayoral DC, the Pre-Submission Local Plan is not required to be in conformity with a spatial development strategy.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage D: Consulting and engaging on the policies update				
34.	PM	Have you obtained the relevant authority permissions to publish the first draft / options for public consultation?		Y	Any relevant authority reports to Cabinet / Committee	Each iteration of the emerging Local Plan has been approved by the Council in line with its standing orders and constitution as follows: - The Issues and Options document was approved for 8 weeks of public consultation by Cabinet in July 2017 (item 4)¹⁴¹. - The Portsmouth City Local Plan Consultation Document and the Tipner Strategic Development Area consultation document were approved for 6 weeks consultation by Cabinet in February 2019¹⁴² (Item 6). - The draft Portsmouth Local Plan Regulation 18 Consultation Document was approved for 6 weeks public consultation by Cabinet in July 2021¹⁴³ (Item 4). - The Pre-Submission Regulation 19 Local Plan (2024) document was approved by Full Council for public consultation on 28 May 2024¹⁴⁴ (Item 5).

¹⁴¹ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3809&Ver=4>

¹⁴² <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4068&Ver=4>

¹⁴³ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4717&Ver=4>

¹⁴⁴ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5603&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Pre-Submission PLP Addendum 2025 was approved by Full Council for public consultation on 11 November 2025¹⁴⁵¹⁴⁶.
35.	L	Have you notified the following bodies or persons that you are preparing a local plan policies update and invited them to make representations on what the plan should contain? - The specific consultation bodies that may have an interest; - The general consultation bodies that the authority consider appropriate; - Residents or other persons carrying on business in the area as considered appropriate; and - Any other stakeholders that you have engaged with in earlier stages on strategic matters and who will be party to your Duty to Cooperate Statement(s) of Common Ground and are relevant parties pursuant to your duty to cooperate	P&CPA Section 20 and Section 33A T&CP Regulation 18 NPPF Para 16, 24-27, and 35	Y	- Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements - Consultation Statement - Copies of consultation notifications - Records of discussion	All stages of consultation of the new Local Plan have been undertaken in line with the Local Plan regulations and the Council's Statement of Community Involvement¹⁴⁷, which includes notifying the bodies outlined in the Key Questions to the left and inviting those bodies to make representations The preparation of the new Local Plan has been informed by four Preparation Stage ('Regulation 18') public consultations: - An Issues and Options document (August 2017) on the topics and issues to be addressed by the Plan - An Evidence Base Update consultation (2019) - Consultation on the Tipner Strategic Development Area proposals in February 2019 - A consultation on the draft Local Plan in September 2021 The Council consulted on the Regulation 19 PLP2024 between July and September 2024 and the PLP Addendum 2025 between November 2025 and January 2026.

¹⁴⁵ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5848&Ver=4>

¹⁴⁶ <https://democracy.portsmouth.gov.uk/documents/s60447/11.11.25%20Draft%20Council%20Minutes.pdf>

¹⁴⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2023/12/Draft-Statement-of-Community-Involvement-2023-aa-accessible.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Council has sought early engagement with the Duty to Cooperate bodies. It has liaised with stakeholders at multiple stages prior to preparation of Statements of Common Ground, this includes both formal consultation stages and informal ongoing working. The exact amount of prior engagement and discussion varies between stakeholders. The City Council has worked collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in the Regulation 19 PLP 2024. Bilateral Statements of Common Ground have been agreed with individual neighbouring local authorities and are referenced in the Interim Duty to Cooperate Statement¹⁴⁸.
36.	L	Have you made sure that the consultation and invitation to make representations: - Follows the principles set out in your adopted Statement of Community Involvement; - Integrates any involvement with the Duty to Cooperate Statement(s) of Common Ground; and - Is proportionate to the scale of issues involved in the local plan policies update.	P&CPA Section 19 NPPF Para 27 and 35	Y	- Statement of Community Involvement - Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements - Consultation Statement	As the new Local Plan is a whole Plan update, the consultation and invitation to make representations has been proportionate to the scale of issues involved. The published Consultation Statement (March 2026) sets out how the principles of the adopted Statement of Community Involvement have been followed during the Plan's preparation. This has been updated for Submission of the PLP 2024 and PLP Addendum 2025 for examination.

¹⁴⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Duty-to-Cooperate-Statement-November-2025.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
37.	L	Have you prepared a draft of your Consultation Statement (a “proposed submission document”) that includes a record of: • The individuals or bodies invited to make representations; • How this was done; • The main issues raised; and • In preparation of Stage E (and to be completed in Stage E as outline below) how the main issues have been addressed in the local plan policies update.	P&CPA Section 19 T&CPA Regulation 17, 18, 19 and 22 NPPF Para 16, 24-27, and 35	Y	• Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements • Consultation Statement	A thorough Consultation Statement has been published, in accordance with the Key Questions to the left, and Regulation 22(1)(c) of the Town and Country (Local Planning)(England) Regulations 2012. This sets out how the Council has involved residents and key stakeholders in preparing the new Local Plan in accordance with Regulations 18, 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the adopted Statement of Community Involvement (SCI) (2017 and 2023 update). A number of consultation documents have been produced throughout the plan-making process to date. This includes the: • Local Plan Issues and Options Consultation¹⁴⁹ (2017); • Tipner Strategic Development Area consultation¹⁵⁰; • Local Plan evidence base update consultation¹⁵¹; • Portsmouth Local Plan 2038 'Regulation 18' Consultation Document¹⁵². Consultation summary documents set out the outcomes of each of the consultations and the main points identified. The Council has prepared the following consultation summary documents:

¹⁴⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Issues-and-Options.pdf>

¹⁵⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf>

¹⁵¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Update.pdf>

¹⁵² <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						• The Issues and Options Consultation Summary Document¹⁵³ (November 2017) • Tipner and Horsea Island consultation summary document¹⁵⁴ (July 2019) • A Local Plan Evidence Base Update consultation summary document¹⁵⁵ (July 2019). In December 2017, Cabinet was informed on the responses received to the Local Plan Issues and Options consultation and reports on the consultation arrangements¹⁵⁶. Members were updated on the outcome of the Local Plan and Tipner consultations in July 2019¹⁵⁷. This highlighted key responses and set the way forward on technical work. It also set out progress on discussions with neighbouring authorities under the Duty to Cooperate. Taking into account all the responses, the draft Local Plan was prepared for full consultation in September 2021. The PLP has been positively prepared, taking into account the comments received to the previous three Regulation 18 consultations. An updated Regulation 22 Consultation Statement is prepared for Submission. This includes a summary of the main issues raised at the Regulation 19 consultation stages for the PLP 2024 and PLP Addendum 2025. The Consultation Statement also includes the LPA's

¹⁵³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-Local-Plan-summary-of-responses.pdf>

¹⁵⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-and-Horsea-Island-Consultation-Summary.pdf>

¹⁵⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Evidence-Consultation-Summary.pdf>

¹⁵⁶ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=3881&Ver=4>

¹⁵⁷ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=126&MId=4314&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						responses to the issues raised, in accordance with the Pre-Examination Checklist.
38.	L / PM	Have you consulted on the following emerging documents alongside your first draft plan so that they can be reviewed against representations and policy options and alternatives as they are developed? • Sustainability Appraisal; and • Habitats Regulations Screening Assessment (or Habitats Regulations Assessment if one has been developed at this stage)	P&CPA Section 19 and Section 39 The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 2001/42/EC	Y	• Sustainability Appraisal (and any drafts) • Habitats Regulations Assessment screening report • Habitats Regulations Assessment • Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements • Consultation Statement	The iterations of the Sustainability Appraisal and Habitats Regulations Assessments have been published for consultation alongside each version of the Local Plan. Dates of each consultation are set out in the answer to Q37.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
			The European Directive 92/43/EEC NPPF Para 32			
		Stage E: Developing the submission version of the policies update				
39.	PM	Taking account of the consultation have you considered whether there is a need for further evidence and / or evidence to be updated to support the policy options set out in your plan?	P&CPA Section 13 and Section 20	Y	• Consultation statement • Baseline technical data • Commissioned reports and studies	The evidence supporting the Local Plan has been prepared and updated throughout the plan making process as required. New studies have been commissioned and the evidence base has continued to evolve as the Plan progressed to Regulation 19. Findings of this evidence have informed updated policies as the plan has progressed. For example, a Viability Study was prepared in October 2020 to support the preparation of the draft Local Plan. A new and updated Viability Study¹⁵⁸ was prepared post-Brexit and post-Covid-19 in May 2024 to support the policy options set out in the Pre-Submission Local Plan.

¹⁵⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PCC-Development-Viability-Assessment-Update_2024.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						The Council has considered whether there is the need for further evidence to be provided and/or for evidence to be updated to support the Pre-Submission Local Plan 2024 and Local Plan Addendum 2025. One area in which the Council has considered this is in relation to its HRA. As set out above at Q26, the HRA process has been iterative, commencing with a screening assessment at the Issues and Options stage in August 2017 and proceeding through full HRAs produced at the Regulation 18 (August 2021) and Regulation 19 (April 2024 and September 2025 stages. Each iteration has responded to previous consultation responses. Policy PLP3:Tipner West and Horsea Island East strategic site allocation as proposed in the Pre-Submission Local Plan 2024 required a derogation from the Habitats Regulations. This required three tests to be met as set out in regulations 107 and 109 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'). To provide reassurance in relation to the first two of those tests, the Council sought an opinion from the Secretary of State under regulation 107(3) of the Habitats Regulations ('the IROPI opinion'). The Council first submitted such a request in April 2023¹⁵⁹. In September 2023, a response was received from DHLUC¹⁶⁰ stating it could not at that stage provide the IROPI opinion as PCC as the plan-making authority must first be satisfied there are no alternative solutions.

¹⁵⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/PortsmouthCC-Reg107-IROPI-Opinion-Request-FINAL-.pdf>

¹⁶⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/230922-IROPI-response-Portsmouth-CC-2.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						Therefore, an opinion could not be given in advance of a finalised alternatives assessment, a completed assessment of the implications of the plan for the integrity of the sites concerned, and a proposed compensation strategy. In October 2024, the Council resubmitted its request for the IROPI opinion, accompanied by the Regulation 19 HRA and other supporting documents¹⁶¹. The Secretary of State's first IROPI Opinion, received in February 2025, was negative but on account of legal errors in the Opinion, it was withdrawn by the Secretary of State. The second IROPI Opinion, received at the end of July 2025, was also negative and was also withdrawn. Notwithstanding the City Council's view that the Secretary of State's IROPI opinions were both unlawful, PCC decided, on a pragmatic basis and cognisant of the pressing 12 June 2026 deadline for submission of a Local Plan for examination, to prepare a version of Policy PLP3 that had no adverse impact on internationally designated sites that cannot be mitigated against, through a Local Plan Addendum. As stated above, the Addendum contains a new draft policy PLP3:Tipner West, which replaces the policy in the Pre-Submission Local Plan 2024 for PLP3: Tipner West & Horsea Island East. The new draft policy has been amended so that there are no adverse effects on the integrity of an internationally designated site that

¹⁶¹ https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Letter-to-MHCLG_FINAL-compressed-as-SENT.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						cannot be avoided or adequately mitigated. As a result, an updated HRA has been prepared in September 2025 (as stated in Q26) which does not require derogations tests including IROPI.
40.	PM	Have you considered whether further consultation and engagement is required depending on the nature and significance of any proposed changes to the preferred strategy following consultation and / or further evidence? Where further consultation and engagement is required prior to submission this should be undertaken, recorded and reported in line with the requirements set out above. This includes updating and consulting where necessary on any corresponding amendments to the Sustainability Appraisal and Habitats Regulations Assessment.	P&CPA Section 13 and Section 20	Y	• Consultation statement • Baseline technical data • Commissioned reports and studies • Sustainability Appraisal (and any drafts) • Habitats Regulations Assessment screening report • Habitats Regulations Assessment • Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements	The consultation responses received at both Regulation 19 consultations indicate that many issues raised at earlier stages of plan preparation have been resolved. The Council's responses to the representations received at Regulation 18 and Regulation 19 are set out in the Consultation Statement (March 2026). The Council continues to engage under the DtC to resolve areas of disagreement. The Council has prepared separate Schedules of Changes for the Pre-Submission PLP 2024 and PLP Addendum 2025 that puts forward minor modifications to the Plan for the Inspector to consider. Most of these arise from representations received at the Reg 19 stage. The decision on whether to advertise any 'additional modifications' is at the discretion of the Council, however the Council will consider consulting on the additional modifications at the same time as consulting on main modifications during the examination process. No further consultation or engagement is planned at the time of writing (February 2025). The Council intends to progress the Pre-Submission Plan and its supporting documents towards Submission in March 2026.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
41.	L	Have you prepared the Sustainability Appraisal report on any revised draft of the local plan policies update? Is it clear how the sustainability appraisal has influenced the plan?	P&CPA Section19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	Y	• Sustainability Appraisal	The Sustainability Appraisal has been prepared and revised throughout each stage of plan preparation. An updated SA has been prepared for the Pre-Submission (Regulation 19) PLP (2024) ¹⁶² , the Pre-Submission PLP Addendum 2025 ¹⁶³ , as well as the SA Submission Statement (2026) ¹⁶⁴ .
42.	L	Have you prepared an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not required and confirmation from Natural England that they concur?	The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 2001/42/EC	Y	• Habitats Regulations Assessment screening report • Habitats Regulations Assessment	The Regulation 18 version of the HRA published in August 2021¹⁶⁵, the Regulation 19 versions of the HRA published in May 2024¹⁶⁶ and September 2025¹⁶⁷ and the Submission version of the HRA published in March 2026¹⁶⁸ include an Appropriate Assessment. Since the HRA process must consider the Local Plan as a whole, an update to the HRA report was produced rather than a separate addendum. Section 5 of the HRA 2025 evidences the Council's screening for likely significant effects, assessing all policies in the emerging PLP for impact pathways linking to Habitats sites. Section 6 of the HRA Update for the

¹⁶² https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Appendix_2_a_SA_Reg-19-SA.pdf

¹⁶³ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-Local-Plan-Addendum-SA-Report-Update_v2_25-Sept_updated-FINAL.pdf

¹⁶⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Portsmouth-Local-Plan-SA-Submission-Statement_Feb-2026_final.pdf

¹⁶⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/PLP-HRA_150921_Final_compressed.pdf

¹⁶⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PLP_HRA-2024_FINAL.pdf

¹⁶⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Local-Plan-HRA-for-LP-Addendum-v4.pdf>

¹⁶⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Local-Plan-HRA-March-26_final.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
			The European Directive 92/43/EEC NPPF Para 32			Local Plan Addendum includes an Appropriate Assessment of the Pre-Submission PLP and PLP Addendum. Section 7 sets out the conclusions of the Appropriate Assessment and the recommendations. This concludes that with the amendments recommended in Section 7 of the HRA and now included in the Local Plan, no elements of the PLP will have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects.
43.	L	Have you updated your Equalities Impact Assessment?	Equality Act 2010	Y	• Equalities Impact Assessment	An Equalities Impact Assessment was prepared in February 2024 to accompany the Regulation 19 PLP, as part of a comprehensive Integrated Impact Assessment¹⁶⁹ (IIA), based on the Council's priorities and strategies. This was updated for the Pre-Submission PLP Addendum in September 2025¹⁷⁰. The scope of the IIA covers the following areas: • Air quality • Carbon emission • Climate change • Crime • Culture and heritage • Economy • Employment and opportunities • Energy • Equality • Health • Housing

¹⁶⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Appendix_5_Integrated-Impact-Assessment-IIA.pdf

¹⁷⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/KD16_Integrated-Impact-Assessment.IA745854637.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						• Income • Natural environment • Transport • Waste management. The IIA considers the positive and negative impacts of the Plan, how to mitigate any negative impacts, and measures the impact of new Plan. It covers a number of key areas which relate to meeting sustainable development through achieving the three economic, environmental and social objectives. The IIA process has been iterative and has fed into the preparation of the pre-submission draft Plan.
44.	L	Have you taken account of all of the representations received from all person(s) in response to the consultation(s) in Stage D? Have you recorded how the main issues have/will be addressed in your draft consultation statement?	T&CPA Regulation 17, 18 and 22	Y	•Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements •Consultation Statement •Local Plan •Relevant correspondence	The Council produced a Consultation Statement ¹⁷¹ (July 2024) which sets out how the main issues raised through representations raised at Regulation 18 have been addressed. An updated Regulation 22 Consultation Statement has been prepared for Submission. Q37 above sets out further information on the production of the Consultation Statement and how this has been revised at each stage.
45.	PM	Have you considered whether or not you intend to confirm the housing land supply through the independent examination process? If so, have you clearly stated this within your Regulation 19 Submission local plan policies update and have you ensured that you will engage appropriately with developers and	NPPF para 76-78 T&CPA Regulation 17, 18 and 22	Y	•Local Plan •Relevant correspondence	The Council expects the housing land supply to be confirmed at the Local Plan examination. This was previously confirmed in written correspondence with PINS in July 2024. This will be confirmed in the Submission letter to PINS. The Housing Land Supply is set out in table 6.1 of the Pre-Submission Local Plan Addendum 2025 and the overall figure is set in Strategic Policy PLP16: Housing

¹⁷¹ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/FINAL_Consultation-Statement_Reg_22.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		others with an interest in housing delivery on the housing land supply?				Target. Individuals will be able to comment on the supply during the Regulation 19 Consultation Stage. The Council has engaged appropriately with landowners, developers and others with an interest in housing delivery throughout the preparation of the Plan including engagement with the Council's Housing Team where the Council is the landowner; and with smaller sites through the 2021 Call for Sites. The most recent Call for Sites was undertaken in Spring 2025. During the preparation of the Regulation 19 Pre-Submission Local Plan, the Council has engaged with the promoters of all site allocations. Statements of Common Ground between the Council and the landowners have been prepared. The Council will continue to engage to ensure delivery of the Plan's strategic, allocated and identified sites.
46.	PM	Does your local plan policies update include a trajectory illustrating the expected rate of housing delivery over the plan period? Will your local plan policies update provide for a 5 year supply of deliverable housing sites (incorporating the appropriate buffer) on adoption against the housing requirement (which is informed by a local housing need assessment conducted using the standard method as a starting point)?	NPPF paras 11, 75 and 76-78	N	● Local Plan	Appendix 3 of the Pre-Submission Local Plan Addendum 2025 includes a housing trajectory illustrating the expected rate of housing delivery over the plan period 2025-2040. A trajectory is also included in the Housing Background Paper. Table 6.1 of PLP16: Housing Target sets out the sources of new homes in Portsmouth. Policy PLP16: Housing Target sets a housing requirement target for Portsmouth of 11,369 net additional homes during the Plan period 2025 to 2040, with a net annual provision of approximately 588 homes each year over the period 2025-2030, and a net annual provision of approximately 843 homes each year over the period 2030-2040.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage F: Independent examination and adoption				
47.	PM	Have you obtained the relevant authority permissions to publish the submission version of the local plan policies update? You may want to consider including approval to submit this to the Secretary of State (Planning Inspectorate)		Y	Any relevant authority reports to Cabinet / Committee	Yes, the Council approved consultation on the Pre-Submission version of the Local Plan and submission for examination at its Full Council meeting on 28 May 2024¹⁷² (item 5), with delegated authority to the Assistant Director of Planning and Economic Growth to make any minor changes arising from the Pre-Submission (Regulation 19) consultation. Consultation on the Pre-Submission Local Plan Addendum and submission for examination was approved by Full Council on 11 November 2025.
48.	L	Have you made clear where and within what period representations must be made?	T&CPA Regulation 17, 19, 20 and 35	Y	Report or record of decisions	For the Regulation 19 consultation on the Pre-Submission Local Plan 2024, the period in which representations can be made, and where and how representations can be made, were set out in the Pre-Submission Local Plan¹⁷³ and in the Statement of Representation Procedure¹⁷⁴. Representations could be made via: - The Local Plan online consultation form - By email to the Council's Planning Policy Consultations email address. - By post delivered to the Portsmouth City Council Civic Offices.

¹⁷² <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5603&Ver=4>

¹⁷³ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/presubmission-portsmouth-local-plan-june-2024-aa-accessible.pdf>

¹⁷⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/FINAL_Statement_of_Representation_Procedure_Availability.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						By paper comment form obtained from the Civic Offices or a deposit point (Central, Cosham, Fratton and Southsea Libraries) and delivered to the Civic Offices. Representations were required to be submitted between 9 July 2024 and 23:59 on 3 September 2024. These were further publicised on the Council's website and other by means including direct emails, e-news, and social media. This approach has been followed for the Regulation 19 consultation on the Pre-Submission Local Plan Addendum 2025. Representations were required to be submitted between 18 November 2025 and 23:59 on 8 January 2026. The Council extended the consultation period beyond the statutory six-week period by one week to provide additional time for responses to the consultation. This was due to the Christmas and New Year bank holidays falling within the six-week consultation period.
49.	L	Have you published on your website and made copies of the following available for inspection: - the proposed submission documents - the statement of the representations procedure	T&CPA Regulations 19 and 35	Y	- Statements and record of where and when documents were made available - Consultation Statement	In July 2024, the Council published on its website the proposed Pre-Submission Local Plan 2024, the statement of representation procedure and details of where and when documents could be inspected¹⁷⁵ In November 2025, the Council published on its website the proposed Pre-Submission Local Plan Addendum

¹⁷⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/FINAL_Statement_of_Representation_Procedure_Availability.pdf

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		statement and details of where and when documents can be inspected Have you checked you have met all other requirements of your Statement of Community Involvement?				2025, the statement of representation procedure and details of where and when documents can be inspected¹⁷⁶. The Pre-Submission PLP 2024 (Regulation 19) is available to view and download from the PCC website¹⁷⁷. Paper copies of these documents were also available for viewing on request at the following locations: - Portsmouth City Council, Civic Offices, Guildhall Square, Portsmouth PO1 2AU - Central Library, Guildhall Walk, Portsmouth PO1 2DX - Cosham Library, Spur Road, Cosham, Portsmouth PO6 3EB - Carnegie Library, Fratton Road, Portsmouth PO1 5EZ - Southsea Library, 19-21 Palmerston Rd, Southsea, Portsmouth, Southsea PO5 3QQ The Pre-Submission PLP Addendum 2025 is available to view and download from the PCC website. Paper copies of the Plan were also available for viewing on request at the following locations: - Portsmouth City Council, Civic Offices, Guildhall Square, Portsmouth PO1 2AU - Central Library, Guildhall Walk, Portsmouth PO1 2DX - Cosham Library, Spur Road, Cosham, Portsmouth PO6 3EB

¹⁷⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf>

¹⁷⁷ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						• Carnegie Library, Fratton Road, Portsmouth PO1 5EZ • Southsea Library, 19-21 Palmerston Rd, Southsea, Portsmouth, Southsea PO5 3QQ All requirements of the Council's SCI have been met in the publication of the Pre-Submission (Regulation 19) Local Plan.
50.	L	Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1): • A copy of each of the proposed submission documents; and • the statement of the representations procedure	T&CPA Regulation 19(b)	Y	• Consultation Statement • Evidence of notifications (email)	At Regulation 19 in July 2024, a copy of each of the proposed submission documents and the statement of representations procedure¹⁷⁸ was sent to each of the specific consultation bodies listed in Appendix B of the SCI¹⁷⁹ invited to make representations under Regulation 18(1). At Regulation 19 in November 2025, a copy of each of the proposed submission documents and the statement of representations procedure¹⁸⁰ has been sent to each of the specific consultation bodies listed in Appendix B of the SCI invited to make representations under Regulation 18(1).
51.	L	Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1):	T&CPA Regulation 19(b)	Y	• Consultation Statement • Evidence of notifications (email)	A copy of the statement of the representations procedure which contains information on where and when the documents can be inspected has been sent to each of the general consultation bodies listed in Appendix A of

¹⁷⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/FINAL_Statement_of_Representation_Procedure_Availability.pdf

¹⁷⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2023/12/Draft-Statement-of-Community-Involvement-2023-aa-accessible.pdf>

¹⁸⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Statement-of-Representations-Procedure-Statement-of-Fact-PLP-Addendum.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		- the statement of the representations procedure; and - where and when the documents can be inspected				the SCI invited to make representations under Regulation 18(1). A thorough Consultation Statement has been prepared and is published, in accordance with the Key Questions to the left, and Regulation 22(1)(c) of the Town and Country (Local Planning) (England) Regulations 2012. This sets out how the Council has involved residents and key stakeholders in preparing the new Portsmouth Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the adopted Statement of Community Involvement (SCI) (2017 and 2023 update).
52.	L	Have you, on the day of publication, requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the local plan update with the spatial development strategy?	P&CPA Section 24 T&CPA Regulation 21	N	Copy of letter	As Portsmouth is not a London Borough or Mayoral DC, PCC is not required to request the opinion of the Mayor of London on the general conformity of the local plan update with the spatial development strategy.
		Getting ready for submission to PINS				
53.	PM	Get ready for submission and examination, this might mean starting the process of appointing a programme officer, securing rooms for a potential hearing and other practical arrangements. Refer to	See PINS Procedure Guide for Local Plan Examinations 2021	Y		The Council has reviewed the PINS Procedure Guide for Local Plan Examinations¹⁸¹ (updated August 2024). The Council understands it must: Ensure the Programme Officer is in post by the time the Plan is submitted.

¹⁸¹ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		guidance from the Planning Inspectorate.				• Ensure the examination website has been set up by the time of submission. • Be responsible for arranging and hosting the hearing sessions in terms of both a physical venue and/or providing a platform for participants to take part virtually. • Organise practical arrangements for hearing sessions, including the most appropriate room layout; provide adequate seating. The Council has appointed a programme officer (Kerry Trueman, Programme Officer Solutions Limited). The PO has been set up with an email address programmeofficer@portsmouthcc.gov.uk and IT access. The Council has made arrangements to secure suitable rooms for the hearing at the Guildhall. An examination website has been set up and will be made live on the Council's website upon submission of the Local Plan to the Secretary of State via PINS.
54.	PM	Have you obtained the relevant authority permissions to submit the plan to the Secretary of State via the Planning Inspectorate (PINS)		Y	• Any relevant authority reports to Cabinet / Committee	Full Council resolved on 28 May 2024¹⁸² (item 5) to submit the Pre-Submission Local Plan 2024 to the Secretary of State via the Planning Inspectorate (PINS). Full Council agreed to submit the Pre-Submission Local Plan 2024 and the Pre-Submission Local Plan Addendum 2025 to the Secretary of State via PINS on 11 November 2025¹⁸³ (item 10).

¹⁸² <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5603&Ver=4>

¹⁸³ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=5848&Ver=4>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
55.	L	Have you collated all of the representations made to the publication draft plan policies update?	P&CPA Section 20(3) T&CPA Regulation 22(1)(e)	Y		The Council has collated all of the representations made to the publication draft plan policies update in an electronic format using its customer relationship management database as well as within an electronic spreadsheet. Any physical representations made, such as by letter, were scanned in electronically and stored in the database.
56.	PM	Does each representation made have a unique ID and contact details? PINs require that these are provided in an electronic database enabling the full text of each representation to be accessed easily in both policy and paragraph number order and representor order. The database should also clearly identify those who have made a request to be heard by the Inspector under section 20(6) of the PCPA	See PINS Procedure Guide for Local Plan Examinations 2021 ¹⁸⁴	Y		Each representor has been given a unique ID number, and each representation made by that unique ID has a representation ID number. Contact details including the email address(es) and/or phone number(s) are stored for each representation. Representations will be provided in an electronic database that enables the full text of each representation to be accessed easily in both policy and paragraph number order and in representor order. The database will clearly identify those who have made a request to be heard by the Inspector where indicated on the Pre-Submission PLP (2024) Response Form and Pre-Submission PLP Addendum 2025 Response Form.
57.	L	Have you assembled the relevant supporting documents (documents relevant to the preparation of your plan which normally includes or comprises the evidence base)?	P&CPA Section 20(3)	Y	● Submission documents / Examination library	The Council has assembled all relevant supporting documents, which formed the evidence base for the PLP in the Examination Library.

¹⁸⁴ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
			T&CPA Regulation 22(1)(g)			
58.	PM	Do all of the documents that you will submit to the inspectorate have a unique reference listed in an 'Examination Library'?		Y	Submission documents / Examination library	All of the documents that the Council will submit to the Planning Inspectorate have a unique reference ID and will be listed in the Examination Library at Submission.
59.	L/ PM	You may need to consider whether you need to redact certain personal details from representations for the website and inspection purposes. However, those who have made representations should be able to contact one another and documents should be provided without details redacted. See the guidance from the Planning Inspectorate.	General Data Protection Regulation 2018 See PINS Procedure Guide for Local Plan Examinations 2021	Y		PCC has reviewed guidance from the Planning Inspectorate and has considered the need to redact certain personal details from representations for the website and inspection purposes. Personal information and offensive comments provided on representations made public will be redacted where necessary, Those making representations will be notified of PCC's Planning Consultee Privacy Notice¹⁸⁵, informing how the Council collects and uses personal information in relation to Planning Policy consultations including the Portsmouth Local Plan.
60.	L	Have you prepared a statement setting out: - Which bodies and persons were invited to make representations under Regulation 18 - How they were invited - A summary of the main issues raised	P&CPA Section 20 (3) T&CPA Regulation 22(1)(c)	Y	Consultation statement	A thorough Consultation Statement has been prepared and is published, in accordance with the Key Questions to the left, and Regulation 22(1)(c) of the Town and Country (Local Planning) (England) Regulations 2012. This sets out how the Council has involved residents and key stakeholders in preparing the new Portsmouth Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the adopted

¹⁸⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2023/03/Planning-Consultee-Privacy-Notice-.pdf>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		How the representations have been taken into account				Statement of Community Involvement (SCI) (2017 and 2023 update).
61.	L	Have you prepared a statement giving: - the number of representations made under Regulation 22 - a summary of the main issues raised OR - Stating that no representations were made	P&CPA Section 20(3) T&CPA Regulation 22(1)(c)	Y	- Consultation Statement - The Statement as required in Regulation 22(1)(c) – this can be included in the Consultation statement	The Council prepared a Consultation Statement in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) (as amended) Regulations 2012. It sets out the number of representations made under Regulation 22 and a summary of the main issues raised, stating where no representations were made (if applicable). The Council has included this in Appendix 3 and 4 of the Regulation 22 Consultation Statement. It also sets out the Council's response to the representations made at both Reg 19 consultations.
62.	PM	Consider what documents need printing to ensure that hard copies are available where necessary for inspection and for the examination library.	See PINS Procedure Guide for Local Plan Examinations 2021 ¹⁸⁶	Y		PCC has considered which documents will need printing to ensure that hard copies are available where necessary for inspection and for the examination library. The following documents listed below will be made available for inspection in hard copy format at the Council's principal office (Civic Offices, Guildhall Square, PO1 2AU) and at deposit points (the Central, Cosham, Fratton and Southsea Libraries). - Pre-Submission version of the Portsmouth Local Plan (2024) - Pre-Submission version of the Portsmouth Local Plan Addendum (2025) - HRA (2025) and HRA Update for Submission (2026)

¹⁸⁶ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
						- SA Report Update (2025) and SA Submission Statement (2026) - SA Non-Technical Summary (NTS) (2025) - Regulation 22 Consultation Statement - Schedule of Changes to the Pre-Submission Local Plan 2024 - Schedule of Changes to the Pre-Submission Local Plan Addendum 2025
		Submission to PINS				
63.	L	Have you sent the Secretary of State (the Planning Inspectorate) a hard copy and electronic version of: - a copy of the local plan policies update - and (if prepared) policies map Have you sent the Secretary of State (the Planning Inspectorate) an electronic version of: - the Final 'consultation statement' supplemented by or incorporating the documents consultation required under Regulation 22(1) - The Sustainability Appraisal - Copies of representations	P&CPA Section 20(1) and 20(3) T&CPA Regulations 22 See PINS Procedure Guide for Local Plan Examinations - GOV.UK¹⁸⁷			A hard copy of the Submission version of the Portsmouth Local Plan and the policies map will be submitted to PINS if requested. An electronic version of the supporting documents will be submitted to PINS. This will include but is not limited to: - Pre-Submission version of the Portsmouth Local Plan (2024) - Pre-Submission version of the Portsmouth Local Plan Addendum (2025) - Policies Map (2024) - Addendum Policies Map 2025 extracts A, B and C - Regulation 22 Consultation Statement - SA Report (2024), SA Report Update for the Addendum (2025), and SA Submission Statement (2026) - Copies of all Reg 19 representations - HRA (2024), HRA Update for the Addendum (2025) and HRA Update for Submission (2026)

¹⁸⁷ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		• ‘Supporting documents’ Guidance from PINS also highlights other material necessary for the examination which includes: • An Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not required and confirmation from Natural England that they concur; • The LPA’s current Local Development Scheme; • In London, confirmation that the Mayor has indicated general conformity with the London Plan (note however that the Inspector is entitled to take his/her own view on conformity). • It is also helpful if the LPA provide an Equalities Impact Assessment				• Local Development Scheme • Integrated Impact Assessment As Portsmouth City Council is not a London borough, the Council is not required to seek and provide confirmation that the Mayor has indicated general conformity of the Pre-Submission Plan with the London Plan.
64.		As soon as practical after submission, on your website, have you published:	T&CPA Regulation 22(3) and 35(1)(b)			As soon as practical after Submission, the documents identified above will be published on the Council's evidence pages.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		- The documents submitted to PINS (identified above) including representations made under Regulation 20 (where practicable) taking into account GDPR requirements? - Statement as to where and when these documents are available for inspections (again this should be in line with any requirements in your Statement of Community Involvement)?				The Council has prepared a Statement of fact that the Reg 22(3)(a)(i to iii) documents are available for inspection and of the places and times at which they can be inspected, which will be published on the website upon Submission.
65.	L	For each general consultation body invited to make representations under Regulation 18(1), have they been sent: - notification that the documents submitted to PINS are available for inspection - details of where and when they can be inspected	T&CPA Regulation 22(3)(b)		Copies of correspondence	Notifications will be sent as soon as is practicably possible after Submission.
66.	L	Have you given notice to persons who have requested to be notified that submission has taken place?	T&CPA Regulation 22(3)(c)		Copies of correspondence	Notifications will be sent after Submission.
67.	L	If examination hearings are being held, at least six weeks before its opening has the Programme Officer:	P&CPA Section 20		Website	To be undertaken by the Programme Officer once the examination dates are confirmed.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		- published the time and place of the examination and the name of the person appointed to carry out the examination on your website? - notified those who have made representations on the published DPD which have not been withdrawn of these details?	T&CPA Regulations 24 and 35			
68.	L	Have you asked the Inspector to recommend 'main modifications' (changes that materially affect the policies) to make a submitted local plan policies update sound and legally compliant? These modifications should be published for consultation.	See Section 6 of the PINS Procedure Guide for Local Plan Examinations - GOV.UK ¹⁸⁸ P&CPA Section 20 (7C)		Schedule of proposed main modifications	The Council's Submission Letter will request that the Inspector recommends main modifications as necessary to make the Plan sound and legally compliant.
69.	L	Depending on the scope of the modifications, have you considered whether there is a need to undertake further Sustainability Appraisal, Habitats Regulations	The Environmental Assessment of Plans and Programmes Regulations		- Sustainability Appraisal (and any drafts) - Equalities Impact Assessment	To be considered at the appropriate time in the Local Plan process.

¹⁸⁸ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
		Assessment, and Equalities Impact Assessment on the modifications.	2004 (as amended) The European Directive 2001/42/EC The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 92/43/EEC Equality Act 2010		Habitats Regulations Assessment screening report	
70.	L	If the plan policies update is sound, have you formally adopted the plan policies update in a full meeting of the local planning authority?	T&CPA Regulation 4(1) and (3) of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000).		Any relevant authority reports to Cabinet / Committee	To be considered at the appropriate time in the Local Plan process.

	REF	Key questions	Legislation /Policy Source	Y/ N	Examples of documents in which this might be found	Documents demonstrating compliance
71.	L	On adopting a Local Plan policies update, have you made publicly available a copy of the plan, an Adoption Statement and Sustainability Appraisal?	T&CPA Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.		• Adoption Statement	To be considered at the appropriate time in the Local Plan process.