



Portsmouth City Council
Civic Offices
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Portsmouth
PO1 2NE

The Planning Inspectorate

c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

By email only:

plans.admin@planninginspectorate.gov.uk

18 March 2026

Dear Sir/Madam,

Re: Submission of the Portsmouth Local Plan for examination

I am writing to formally submit the Portsmouth Local Plan for Examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. It is submitted under the transitional arrangements for Local Plans set out in Annex 1 of the National Planning Policy Framework 2024 (NPPF). The submission documents have been sent to you via WeTransfer.

I confirm that the City Council requests the examination Inspector to recommend any Main Modifications, which are necessary to make the Local Plan sound, under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

The City Council is also seeking to confirm, through the Examination of this Plan, a five-year supply of deliverable housing sites under paragraph 78 of the NPPF. I confirm that there are no Mineral and Waste elements to the Plan.

The Pre-Submission Local Plan consists of the Pre-Submission Local Plan 2024, which was consulted on under Regulation 19 in summer 2024 and the Pre-Submission Local Plan Addendum 2025, which was consulted on under Regulation 19 in winter 2025/26. A composite version of the two documents has been prepared, which shows the sections of the 2024 Plan that have been superseded by new sections in the Addendum.

The Submission documents include a Schedule of Changes to the Pre-Submission Local Plan 2024 and a Schedule of Changes to the Pre-Submission Local Plan Addendum 2025. The City Council requests that the Inspector considers both in the examination process.

By way of background, the Local Plan Addendum 2025 was prepared by the City Council in the context of the Secretary of State's unlawful and withdrawn decisions in response to the City Council's October 2024 request for an Opinion on whether there were imperative reasons of overriding public interest (IROPI) justifying the adoption of the Pre-Submission

Local Plan 2024 notwithstanding the adverse effects of Policy PLP3: Tipner West & Horsea Island East on protected habitats.

Policy PLP3 of the Pre-Submission Local Plan 2024 allocated Tipner West & Horsea Island East as a strategic site for a new marine employment hub, some housing, flood defences and a bridge to the mainland. As the allocation as then proposed could not be delivered without some adverse effects on the international conservation designations of Portsmouth Harbour, the City Council made a written request, in October 2024, for the Secretary of State's opinion under reg 107(3) of the Conservation of Habitats and Species Regulations 2017.

The Secretary of State's first IROPI Opinion, received in February 2025, concluded that there were no IROPI justifying the adoption of the Plan notwithstanding the adverse effects of Policy PLP3 on protected habitats. However, the opinion was legally flawed and subsequently withdrawn by the Secretary of State.

The Secretary of State's second IROPI Opinion, received in July 2025, also concluded that there were no IROPI justifying the adoption of the Plan notwithstanding the adverse effects of Policy PLP3 on protected habitats. However, that opinion was also legally flawed and subsequently withdrawn by the Secretary of State.

Notwithstanding that the Secretary of State's IROPI Opinions were both unlawful and withdrawn, 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 could not be mitigated, through a Local Plan Addendum. This approach was agreed by Portsmouth City Council's Cabinet in April 2025. On account of the decision to avoid adverse impacts on nature conservation sites, the new regionally significant marine employment hub, providing much needed new jobs and opportunities for training, cannot now be provided at Tipner West. Full details on Tipner West are set out in the updated Tipner West Topic Paper. An IROPI Opinion on the now superseded version of Policy PLP3 contained in the Pre-Submission Local Plan 2024 is awaited by the City Council; we will notify our Inspector immediately through our Programme Officer if and when it arrives. However, the new version of Policy PLP3 in the Pre-Submission Local Plan Addendum does not cause any adverse effects on international conservation designations that cannot be mitigated and so its examination is not dependent on the receipt of an IROPI opinion.

There are a number of potential main issues for the examination. There is a capacity-based housing target that does not meet housing need as defined by the standard method. Policy PLP16 of the Local Plan Addendum 2025 makes provision for at least 11,369 net additional homes during the Plan period of 2025-40. This leaves a total deficit of 3,916 homes over the Plan period and an annualised shortfall of 261 homes per year. The Housing Background Paper and the Housing and Economic Land Availability Assessment (HELAA) demonstrate that no stone has been left unturned in searching out suitable and available new sites for housing. The Constraints Topic Paper explores the constrained island geography of the City and explains how it has proved impossible to meet housing need in a local planning area of 40 square kilometres with much of its land affected by flooding, international nature conservation designations and contamination.

Linked to housing delivery, another main issue for the examination will be the delivery and viability of the seven strategic sites and six site allocations. Each allocation policy is followed by a monitoring and delivery framework table. Statements of common ground have been completed with the site promoters of most of the allocation sites. The main evidence-based document supporting the allocations is the HELAA 2025. The Site Allocations Topic Paper provides a clear, evidence-based rationale to support all the allocations with key information

about each site, signposting key parts of the relevant evidence base documents which have influenced their allocation and affected detailed wording of the policies.

Unmet housing need is identified as one of the strategic cross boundary issues for the City. All the work with neighbouring authorities is set out in the Final Duty to Cooperate Statement. There has been both bilateral work with individual authorities and multilateral work with the Partnership for South Hampshire and our neighbouring authorities in South East Hampshire. Statements of Common Ground have been signed with all our neighbouring authorities.

The affordable housing requirement proposed in Policy PLP17 has been challenged by several representors and may be a key issue for the examination for viability reasons. The Affordable Housing Topic Paper addresses this matter.

The increasing number of Houses in Multiple Occupation (HMO) is locally contentious and has the potential to be a main issue of the examination. The relevant policy is PLP20 and its purpose is to ensure mixed and balanced communities in the City. It sets a concentration limit of 10% of residential properties being HMOs within a 50-metre radius of the application property.

The pre-examination checklist for local plans prepared under the Planning and Compulsory Purchase Act 2004 was sent to the Planning Inspectorate on 23 February 2026, and the response was received on 25 February. Three matters were raised and they are addressed as follows:

1. In regard to checklist questions 2.3 and 2.6, the City Council has completed a Duty to Cooperate Statement and signed statements of common ground with all other relevant LPAs and prescribed bodies. These demonstrate that the City Council has engaged constructively, actively and on an ongoing basis in relation to strategic matters as required by the duty to cooperate under section 33A of the 2004 Act.
2. The HRA report has been completed. There are no outstanding issues to be resolved by the Secretary of State in relation to the Portsmouth Local Plan that has been submitted for examination. As set out above, the City Council awaits an IROPI Opinion on superceded Policy PLP3 of the Pre-Submission Local Plan 2024.
3. The five-year housing supply is calculated from 2027/28. It is set out in Appendix 3 of the Local Plan Addendum 2025 and the Housing Background Paper. In order to clarify this, a minor modification has been included in the Submission Schedule of Changes for the Pre-Submission Local Plan Addendum 2025 as follows: 'pink shading highlights the anticipated five-year housing land supply from the date of adoption.'

The Programme Officer has been appointed, and her details are as follows:

Kerry Trueman
Programme Officer Solutions Limited
programmeofficer@portsmouthcc.gov.uk
07582 310364
Pendragon House, 1 Bertram Drive, Meols, Wirral, CH47 0LG

The examination website has been set up and is available to view here:
<https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan/>

The hearings will be held at the Guildhall in Portsmouth. Following the preparation of the Local Plan Addendum 2025 with a new Policy for Tipner West supported by an HRA without the derogation tests, there are unlikely to be large number of participants at the examination.

A total of 31 representors who sought modifications to the Plan in their Regulation 19 representations confirmed that they would be interested in attending examination hearings. Both Natural England and the RSPB have let us know informally that they are unlikely to attend. It is likely that there will need to be two weeks of hearings. The first to deal with strategic matters and the second to deal with development management matters. I look forward to hearing from you about the dates of the hearings. There are no preferred dates for the hearings although early notice of dates would be much appreciated as the Guildhall is a well-used events venue.

I confirm that the City Council used artificial intelligence (AI) to process the representations on the Pre-Submission Local Plan Addendum 2025. This was done through the company The Future Fox. AI was not used for any previous stages of consultation.

I look forward to working positively with you on the examination of the Portsmouth Local Plan.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Lucy Howard', is positioned above the printed name.

Lucy Howard
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