

EXAMINATION OF THE PORTSMOUTH LOCAL PLAN

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3 June 2026

Lucy Howard
Head of Planning Policy
Portsmouth City Council
Civic Offices
Guildhall Square
Portsmouth
PO1 2AL

By email via the Programme Officer

Dear Ms Howard,

Re: Initial Questions about the Portsmouth Local Plan

1. We write further to the submission of the Pre-Submission Portsmouth Local Plan 2024 [KD01] (hereafter ‘the Publication Plan’) and changes intended to be treated as part of it in the Pre-Submission Portsmouth Local Plan Addendum 2025 [KD02] (‘the Addendum’). Subject to being satisfied that the relevant Planning Practice Guidance (‘PPG’) regarding such changes has been addressed¹, we intend to take the Publication Plan and the Addendum together for the purposes of the examination, as set out by the Pre-Submission Portsmouth Local Plan Composite [KD03] (‘the Plan’).
2. We have begun our initial reading of the Plan, the supporting evidence and representations. Based on this preliminary appraisal, we have several initial questions and requests that are each set out in parenthetical numbering below. The Council’s responses will help inform the next steps for the examination, including the preparation of Matters, Issues and Questions.
3. You should be aware that further matters may be raised following consideration of the responses and/or as a result of examining the submitted evidence in greater detail.

¹ Reference ID: 61-054-20190315

Consultation and co-operation

- 1) Please give reasons for concluding at paragraph 0.19 of the Plan that the Addendum and the Sustainability Appraisal ('SA') of it [KD11] were subject to consultation equivalent to the consultation on the Publication Plan.
- 2) Does the recent adoption of the Winchester District Local Plan 2020-2040 have any implications for the Plan, including in respect of development requirements and unmet needs?
- 3) The Statement of Common Ground ('SoCG') with the Council's Public Health team [SCG22] indicates that addendums to the Biodiversity and Green Infrastructure Background Papers [TP02/TP03] are to be published following submission of the Plan. Does the Council still intend to submit those addendums to support the examination? If so, please provide timescales for their submission.
- 4) The SoCG with Sport England [SCG23] indicates that an update to the Playing Pitch Strategy [GC03] is anticipated in late summer 2026. Does this remain the case and, if so, does the Council anticipate that it will have a bearing on matters relevant to the Plan?
- 5) The SoCG with the Council's Children, Families and Education Directorate [SCG53] appears to specify differing current and anticipated education provision requirements to the Infrastructure Delivery Plan [IN16] ('IDP'). Please clarify whether the IDP sets out the latest position or otherwise provide an update about education provision.

Growth strategy

- 6) We note there have been changing circumstances during plan preparation, including increases to housing need calculated using the standard method in the PPG², a forecast surplus of employment land, and changes to the amount of development anticipated at Tipner West since the publication of the Interim SA Report [KD08]. Against this backdrop, please set out the reasons for discounting each of the 'spatial strategy options' at paragraph 5.47 of the report (or elements of them), including in identifying reasonable alternatives for subsequent stages of the SA and selecting the growth strategy for the Plan, having particular regard to the housing need shortfall.
- 7) What are the Council's reasons for 'identifying' as opposed to 'allocating' the sites in part 1(d) of policy PLP16 and Appendix 2 of the Plan? In particular, is the intention that development of these sites is supported in principle by the Plan and is this reflected in the policies as drafted?

² Reference ID: 2a-002-20241212

- 8) For each of the sites 'allocated' (by policies PLP3 to PLP15) and 'identified' (in Appendix 2) in the Plan, can you please set out how the anticipated numbers of homes has been determined? In providing a response to this question please address whether, and if so how, the following specific matters have been taken into account, with reference to supporting evidence:
- a) any potential for tall building development;
 - b) on-site infrastructure and other development needs such as highway works, early years and education provision, and open space;
 - c) the significance of designated and non-designated heritage assets, particularly in respect of their settings;
 - d) any parts of sites where development may need to be avoided due to flood risk;
 - e) any security concerns for Ministry of Defence assets;
 - f) matters relevant to habitats and species protected by The Conservation of Habitats and Species Regulations 2017, including the extent and availability of suitable alternative natural greenspace or alternative measures³, the replacement of functionally linked land, and flight and sight lines of birds; and
 - g) engagement with landowners/site promoters.

In responding to this question please also confirm the residential density assumptions for the sites and the reasons for them.

- 9) How were the spatial extents of the Opportunity Areas for Tall Buildings shown on the Policies Map [KD04a] determined and why do they differ from the Areas of Opportunity identified in the Tall Buildings Supplementary Planning Document [SPD02] and Tall Buildings Study [PCC02]?
- 10) How were the residential density areas shown on the Residential Densities Policies Map [KD04d] and each of the minimum density categories in policy PLP21 determined, and how have these had regard to the potential for tall buildings?
- 11) In the context of the Plan's proposed housing supply shortfall, please explain why:
- a) policy PLP6 proposes to allocate a range of homes in Portsmouth City Centre and the lower end of the range is taken forward in table 6.1 of the Plan;
 - b) policy PLP7 would safeguard the car park of the Pompey Centre for housing beyond, rather than seek delivery during, the plan period; and
 - c) policy PLP11 proposes 500 homes at Port Solent but paragraph A168 of the Plan identifies that 400 further homes may be delivered beyond the plan period.

³ For examples, see paragraph 6.13 of the latest Habitat Regulations Assessment [KD18]

Delivery, infrastructure and viability

- 12) Part 3(l) of policy PLP3 in the Addendum would require development to deliver or contribute to the 'proposed bridge connecting Tipner West with Horsea Island'. The bridge is also referenced elsewhere in the evidence. Notably, it is categorised as 'critical' infrastructure in the IDP, proposed as part of the South East Hampshire Rapid Transport network in the Portsmouth Transport Strategy [IN08] and reflected in transport evidence such as the Interim Strategic Transport Assessment Addendum [IN04]. However, the Addendum seeks to avoid promoting development that would potentially require Imperative Reasons of Overriding Public Interest ('IROPI')⁴ to give effect to the Plan, which would seemingly include the bridge. Accordingly, please clarify the Council's position in respect of the promotion of the bridge and whether any development anticipated by the Plan, or the mitigation of any associated impacts, would be contingent on the delivery of the bridge.
- 13) The anticipated delivery timescales for development occasionally differs across the Housing Trajectory in Appendix 3 of the Plan, the Monitoring and Delivery Framework for the site allocations, and elsewhere in the evidence. Please confirm which timescales should be taken forward for the purposes of the examination and provide an updated Housing Trajectory if corrections are required.
- 14) How have the assumed annual build out rates been determined in the Housing Trajectory?
- 15) The Planning Inspectorate recently published guidance and a template for local planning authorities to use to provide evidence about housing land supply assumptions to support examinations⁵. Please prepare a note informed by that template which covers each allocated site (including their component sites). The note should also cover the sites identified in Appendix 2 of the Plan that are assumed to contribute towards the five year supply specified in the Housing Trajectory (as updated if necessary in response to Question 13). As part of your response, please include specific reasons for the anticipated timescales and phasing of the delivery of the housing, any site-specific viability assumptions, and key milestones (including in respect of land assembly, funding, masterplanning and critical infrastructure dependencies) that would need to be, or have already been, achieved in order to comply with those timescales.
- 16) Appendix 2 of the IDP sets out infrastructure projects relevant to the growth anticipated by the Plan. However, the relationship between those projects and the specific sites allocated and identified in the Plan is not sufficiently clear in either the IDP or the Allocations Topic Paper [TP08], particularly in respect of the projects in the IDP linked to broad locations or required 'Citywide'. As such, please provide a supplementary table to the Allocations Topic Paper setting out individually for each site the projects on which that site would depend, their categorisation as critical essential or desirable, and anticipated costs, providers, and timescales for delivery.

⁴ Pursuant to Regulation 107 of The Conservation of Habitats and Species Regulations 2017

⁵ Available at: <https://www.gov.uk/guidance/local-plans-housing-land-supply-evidence>

- 17) Please review the hyperlinks in the IDP (particularly sections 3.5, 3.8 and 3.9) to confirm that they relate to the latest evidence and comment on the implications of any discrepancies.
- 18) Does the Development Viability Assessment [HO15] suitably reflect the growth anticipated by the Plan? In particular:
- a) do the assumptions reflect the costs of the infrastructure identified for each of the sites allocated and identified in the Plan, which are to be specified in the Council's response to Question 16;
 - b) have the viability implications of coastal defences and transport infrastructure been considered where relevant; and
 - c) does the assessment remain an appropriate basis for considering viability given that it was prepared prior to publication of the Addendum and the IDP?
- 19) Please specify which of the development typologies detailed in HO15 most closely reflects each of the sites allocated and identified in the Plan. In doing so, having regard to the anticipated infrastructure requirements for the sites identified in the response to Question 16, specify which residual values in the appraisal results in appendices 13 to 16 of HO15 would be most representative for the sites.
- 20) The Tipner West Regeneration Delivery Approach paper [SS35] indicates that, for the development anticipated by policy PLP3 to be delivered, a £107 million funding gap needs to be addressed. Paragraph 3.31 of that paper suggests that the policy ambitions for the allocation may need to be refined as a consequence. Accordingly:
- a) what are the potential funding sources for addressing the deficit; and
 - b) is the allocation likely to be deliverable if external funding is not secured and, if so, what are the anticipated effects of this on affordable housing and other needs that would typically be expected to be met by development?

Other matters

- 21) What are the Council's intentions for the Plan should the Secretary of State provide an IROPI opinion in relation to policy PLP3 of the Publication Plan during the examination?
- 22) Paragraph 0.16 of the Plan indicates that extending the plan period would necessitate fundamental changes to the evidence base. Please explain what would need updating specifically to achieve a 15 year period on adoption of the Plan and include estimated timescales for completing that work.
- 23) The latest Authority Monitoring Report [PCC01] covers the period April 2024 to March 2025. Do you expect an updated report to be available over the course of the examination? If so, when? Please also clarify what the reference to 'pragmatic updates to December 2025' in [PCC01] means in practice.

Next steps

4. We would be grateful for a response to this letter by **1 July 2026**. Given the range of matters covered in this letter, if the Council requires further time to respond fully to certain questions please provide a timetable for the completion of that work.
5. If you have any queries, please contact us through the Programme Officer.

Yours sincerely,

D McCreery, T Parton and M Philpott

INSPECTORS