

Portsmouth City Council
Examination of the Portsmouth Local Plan

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Examination website: [Examination main page](#)

GUIDANCE NOTE FROM THE INSPECTORS

Purpose

1. Before a local plan can be formally adopted, it must be subject to an independent examination. The basis for the examination will be the Pre-Submission Portsmouth Local Plan [KD01 on the examination website] as amended by the Pre-Submission Portsmouth Local Plan Addendum [KD02]. The amendments are reflected in the Pre-Submission Portsmouth Local Plan Composite [KD03], which we intend to principally rely on for the examination and will refer to as 'the Plan'. The Plan was submitted for examination on 18 March 2026.
2. We are the Inspectors who have been appointed by the Secretary of State to examine the Plan.
3. This note provides guidance on how the examination will run. More information on the examination process can be found in the Planning Inspectorate's [Procedure Guide for Local Plan Examinations](#). There is also a short guide (available [here](#)), which may be helpful, especially if you have not previously been involved in an examination.

The Inspectors' role and the purpose of the examination

4. Our task is to examine whether the Plan is 'sound' and if it meets legal and procedural requirements. The 'tests of soundness' are set out in paragraph 36 of the government's [National Planning Policy Framework](#) dated December 2024. It is this version against which the Plan is being examined, not the version published on 17 August 2026. Local plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

5. The potential outcomes of the examination are that:
 - the Plan is sound, meets the relevant legal requirements and does not need to be changed;
 - the Plan is not sound and/or it does not meet the relevant legal requirements, but it could be made to do so by changing it (these changes are known as main modifications). If necessary, this may follow the preparation of additional evidence; or
 - the Plan is not sound and/or it does not meet the relevant legal requirements and it could not be made sound by changes. If so, we would recommend that the Council withdraws the Plan.

Programme Officer

6. The Programme Officer plays a key role in organising the examination and acts as the first point of contact for everyone. They work with us and are independent of the Council.
7. The contact details for the Programme Officer are given above and any questions should be directed to them.

Examination website

8. This will provide information about the examination, including the hearings. It will be updated regularly. Notably, we sent the Council some initial questions in a letter dated 3 June 2026 [ID1] and have been provided with a response to it [PCC06]. Both are available on the examination website. A link to the website is at the start of this note.
9. If you do not have access to the internet, please contact the Programme Officer so that alternative arrangements can be put in place.

Examination process

10. A summary of the examination programme and some key sources of information are set out in the annex to this note.
11. The examination will now move through the following stages, which are outlined in more detail in the Procedure Guide:
 - preparation of statements in advance of hearing sessions;
 - hearing sessions;
 - consultation on any main modifications (changes to the Plan); and
 - our final report on the Plan.
12. The timing and nature of the process is subject to variation depending on how the examination proceeds. For example, there may be additional stages if we conclude that more evidence needs to be prepared to help justify the Plan or inform potential changes to it.

13. The starting point is that the Council considers the Plan to be ready for examination. The Council should rely on the evidence put together while preparing the Plan to show that it is sound. Anyone wanting to change the Plan should explain why they think it is unsound and how their concerns may be resolved.

Changes to the Plan

14. Once the Plan has been submitted for examination there are only two ways in which it can be changed:

Main modifications – these are any changes that are necessary to achieve soundness. During the examination we will discuss if we think any may potentially be needed. Main modifications confirmed as being needed would then be subject to public consultation, and we would consider any comments before concluding on them. They may also need to be subject to sustainability appraisal and/or Habitats Regulations Assessment.

Additional modifications – these are changes which do not materially affect the policies in the Plan. They may be made by the Council when they adopt the Plan and are not a matter for the examination. They are sometimes referred to as ‘minor modifications’. Whether additional modifications are made is a matter for the Council – it is not our role to consider these as part of the examination. Nevertheless, we may assist the Council with identifying whether a proposed change may be regarded as an additional modification on an advisory basis.

15. The Council has suggested a series of main modifications [PCC03] and additional modifications [PCC04] to the Plan. Modifications are also proposed in PCC06. We will consider the suggested main modifications, which may be discussed in the hearings, but it is important to recognise that the basis for our examination is the Plan as submitted. We will only recommend changes to the submitted Plan if they are required to ensure it is sound and/or meet relevant legal requirements.
16. We will also take account of any other potential main modifications suggested by the Council or others during the examination. However, if the Plan is already sound it is not the purpose of the examination to improve it.

Representations made on the Plan

17. The Council has prepared a Submission Consultation Statement [KD34] which includes details of the consultation that has taken place on the Plan, and their summary of the main issues raised in the representations.
18. A full set of the representations made on the Plan has been provided to us and we will take them all into account. These are sometimes referred to as responses to the ‘Regulation 19’ consultation, after the legal regulation relating to this stage. We will not consider representations made on any earlier draft

versions of the Plan (which are sometimes referred to as the 'Regulation 18 stage').

Matters, issues and questions

19. Based on our initial assessment, we have identified a number of matters, issues, and questions we want to explore. Essentially, they are a series of grouped questions on specific topics, intended to give an ordered structure to the examination. They are set out in our Matters, Issues and Questions for Hearing Sessions document which will be published at the same time as this note.

Hearing statements

20. The Council should produce separate statements for each matter, in response to all our matters, issues and questions. There is no need to repeat information in documents on the examination website. However, the Council is encouraged to reference and supplement previously submitted information in its responses as appropriate. The Council should also identify and address related concerns in representations.
21. Other participants and representors should only submit hearing statements on topics they made representations about, also in separate statements. However, if you feel that your representation adequately answers the issues and questions we have raised, there is no need to submit a statement.
22. Statements should be focussed and as short as possible, and in any event must contain no more than 3,000 words for each matter. They should:
 - clearly identify (by reference number) which specific matters, issues and questions are being answered;
 - only answer the specific matters, issues and questions which are of direct relevance to your original representations; and
 - not introduce new evidence or arguments.
23. Appendices should only be included exceptionally if they are directly relevant and necessary and should not be used as a means of increasing the word-count. You should not attach any document over a page long as an appendix without first contacting the Programme Officer to check whether we are content to accept it.
24. Because the Council must answer every question, it may be justified to go over the limit of 3,000 words per matter.
25. Any representor who intends to use artificial intelligence in preparing their statement should follow the Planning Inspectorate's guidance available via this link: [Use of artificial intelligence in casework evidence](#).

26. Please email electronic versions of your statement(s) to the Programme Officer in Word or PDF format by **9.00am on 21 September 2026**. If you are unable to email your statement, please contact the Programme Officer so that alternative arrangements can be made.
27. All hearing statements will be posted on the examination website. They will not be circulated directly to participants. Anyone who is unable to access them on the website should contact the Programme Officer.
28. Once the date for submitting hearing statements has passed, no other written evidence will be accepted throughout the examination, unless we specifically request it. To be fair to all participants, the hearings should not be used to introduce additional evidence.

Statements of common ground

29. The National Planning Policy Framework explains that local authorities should demonstrate effective and on-going joint working with neighbouring authorities by preparing one or more statements of common ground.
30. It is also helpful for statements of common ground to be agreed between the Council and other participants – for example, with other Councils, public bodies and those promoting the development of particular sites. This is particularly desirable where there are significant unresolved issues relating to soundness or compliance with legal requirements. Wherever possible statements should be used to resolve these problems. Failing that, they should define any remaining unresolved disagreements that could affect soundness.
31. Several statements of common ground are already available on the examination website. If any further ones are to be prepared then they should, wherever possible, be completed to the same deadline as for hearing statements. This should not preclude the Council from continuing to engage on outstanding issues with other bodies, which may then result in an update to an existing statement of common ground, if that would help the examination.

Examination hearing sessions

32. The hearing sessions are an important part of the examination. These will start at **10.00am on 6 October 2026**. The hearings are scheduled to be face-to-face events at **Portsmouth Guildhall, Guildhall Square, Portsmouth, Hampshire PO1 2AB**.
33. The programme for the hearings is being issued at the same time as this note and will be on the examination website. The programme will be kept under review and so the website should be checked regularly. For example, we may decide to convene some sessions virtually if necessary as circumstances change during the examination, or rearrange sessions depending on the number of participation requests. Participants are responsible for ensuring that they attend the relevant sessions and keeping aware of any changes to the programme.

34. Hearings typically run from Tuesday to Thursday, with Friday reserved for completing any earlier sessions that overrun. However, there are different arrangements for weeks 3 and 4 of the hearings in the initial version of the programme. The first session each week will start at 10.00am, with a 9.30am start on other days. The hearings will usually finish by 5.00pm but they may continue later if necessary.
35. Each hearing session will consider a specific topic based on our matters, issues and questions. The hearings will be run as structured discussions which we will lead. There will be no formal presentation of cases or cross-examination of participants.
36. Anyone may attend a hearing as an observer, but only those who made a representation seeking to change the Plan have a right to speak and take part. This right to be heard only applies to the hearing session(s) relevant to the representation. It is up to you whether you want to rely on the consultation response you made or if you want to take part in the hearing. However, the hearings are not an opportunity to simply repeat a case already set out in written representations. All representations will be taken into account, regardless of whether they are made verbally at a hearing or in writing.
37. If you have a right to take part and wish to do so, please contact the Programme Officer by **5.00pm on 11 September 2026** indicating which session(s) in the hearing programme you wish to take part in and which are relevant to your representations. You must do this regardless of what you may have indicated in your original representation(s). Please note that if you do not contact the Programme Officer by that date, it will be assumed that you do not wish to take part and you will not be listed as a participant in the hearings. Participants may choose to be represented by someone else, for example a professional expert.
38. Those who made representations which did not seek changes to the Plan, including those supporting it, do not have a right to take part in the hearings. However, we may invite additional people to take part if this would help us assess the Plan.
39. To ensure that there is sufficient space, organisations participating in the hearings will normally be allocated one seat at the table, with members of their team “hot-seating” as necessary. Similarly, the Council should limit the number of its representatives to those needed to deal with the topic under discussion.
40. Where several representors or organisations wishing to take part in the hearings have similar points, it will help us if they can arrange to be represented by one or two spokesperson(s). Please contact the Programme Officer to discuss this.
41. Please let the Programme Officer know as soon as possible if you have any specific needs or requirements to enable your attendance at or participation in the hearings.

42. The Council intends to livestream the hearing sessions. These will enable viewing of the sessions only and be broadcast on the Council's YouTube page: [Portsmouth City Council - Democratic Services - YouTube](#).
43. The issues considered in local plan examinations can be controversial, sometimes leading to strong and conflicting views. At all times during the examination participants and observers are expected to act in a courteous, respectful and helpful manner towards each other. We will ensure that all participants are given a fair opportunity to express their views. Inappropriate material submitted during the examination will not be accepted. Threatening or aggressive behaviour of any kind will not be tolerated.

Representations proposing alternative site allocations

44. Some representations objecting to the Plan may have proposed that different sites from those in the Plan should be allocated for development. These are sometimes referred to as 'omission sites'. However, our role is to examine the soundness of the submitted Plan, not the soundness of sites that are not in it. Consequently, we do not propose to hold a hearing session dealing specifically with omission sites or to discuss their merits at other sessions. Instead, those objecting to the Plan should focus on what they consider makes the Plan unsound.
45. If we conclude that additional sites for development are needed, for example, to meet local housing needs or because an allocated site is unsound, we will ask the Council to decide which alternative or additional sites should be considered for inclusion. These sites would be subject to consultation and we would consider any responses before concluding on them.

Site visits

46. We will decide which sites and which parts of the Plan area we will visit to help us reach our conclusions. We may carry out these visits before, during and after the hearings. We will visit unaccompanied, unless it is necessary to go onto private land, in which case we will make arrangements through the Programme Officer.

After the hearings

47. During the hearings we will let the Council know about any changes to the Plan (main modifications) we think may be necessary. We may also write to the Council after the hearings have ended, for example, if we are unable to reach conclusions in the hearings on the need for some main modifications.
48. The Council will then draft the main modifications and agree them with us, before making them available for public consultation. We will consider any representations about them before reaching our final conclusions.

49. We will then prepare a report for the Council setting out our conclusions and recommendations on any main modifications that are needed. Our report will deal with the main issues of soundness and any procedural and legal issues. We will consider all the points made during the course of the examination. However, we will not be reporting on every issue, question or representation.

Close of the examination

50. The examination will close when our report is submitted to the Council. The Council must then decide whether to formally adopt the Plan. However, the Plan can only be adopted if it includes any changes we have recommended to make it sound. The Council should publish our report as soon as they reasonably can after receiving it. Once it has been issued our involvement in the Plan is over.

D McCreery, T Parton and M Philpott
INSPECTORS

19 August 2026

Annex

Summary of timescales

5.00pm on 11 September 2026 – Deadline to confirm with the Programme Officer whether you wish to exercise your right to appear and be heard at a hearing session

9.00am on 21 September 2026 – Deadline for submission of hearing statements

10.00am on 6 October 2026 – Hearing sessions begin

Further sources of information

Further information about the preparation and examination of local plans is available as follows:

National planning policy and guidance:

- the government's planning policy: [National Planning Policy Framework](#)
- the government's [Planning Practice Guidance](#)
- the government's planning practice guidance specifically on local plans: [Plan-making](#)

The local plan examination process and the role the Planning Inspectorate plays in that – [local plans and the examination process](#). This page includes:

- the Procedure Guide for Local Plan Examinations
- a short guide to taking part in local plan examinations

Relevant legislation – available at <http://www.legislation.gov.uk/>:

- Planning and Compulsory Purchase Act 2004 (as amended)
- The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)