

**Portsmouth City Council
Examination of the Portsmouth Local Plan**

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MATTERS, ISSUES AND QUESTIONS FOR HEARING SESSIONS

1. Prior to the hearing sessions commencing, responses are invited from the Council, other participants and representors on the following matters, issues and questions ('MIQs'). The MIQs intend to assist the Inspectors' consideration of specific aspects of the Pre-Submission Portsmouth Local Plan Composite [KD03 on the examination website] ('the Plan'), taking account of the views of the Council and other representations.
2. The Plan is being examined under the National Planning Policy Framework ('the Framework') dated December 2024. Any references to the Framework below relate to this version.
3. The Council has proposed main modifications to the Plan in a schedule [PCC03] and in answering initial questions from the Inspectors [PCC06] ('the IQR'). Any responses about the suggested modifications should be made, and will be discussed in the hearings where necessary, under the questions that refer to the 4 tests of soundness at paragraph 36 of the Framework (e.g. questions 7, 15 and 21 of Matter 6), unless they are relevant to another question. These questions are also the most appropriate place to comment on supporting text to the policies.
4. This document may be supplemented with further questions from the Inspectors as the examination progresses, including before and after the hearings.
5. Should further changes to the Plan be proposed by the Council as a result of the MIQs, these should be reflected in an updated, separate version of PCC03. This should be kept up-to-date and published prior to the hearings.
6. Further information about the examination and the format and content of hearing statements is provided in the accompanying Guidance Note.

Matter 1: Procedural and legal requirements

Issue: Whether the Plan has been prepared in accordance with relevant procedural and legal requirements.

Plan preparation and scope

- 1) How has the Plan been prepared in accordance with the Local Development Scheme [KD22]?
- 2) Does the Plan clearly distinguish between strategic and non-strategic policies?

Consultation

- 3) Has the Plan been prepared in accordance with the Council's Statement of Community Involvement [KD21] and statutory consultation requirements, including in respect of the publication and availability of documents, advertisements and notifications?

Co-operation

- 4) How is the Plan and its preparation consistent with the policies in the Framework on maintaining effective co-operation?

Equalities

- 5) In what ways does the Plan seek to ensure that due regard is had to the aims expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

Climate change

- 6) Does the Plan comply with Section 19(1A) of the Planning and Compulsory Purchase Act 2004 in including policies designed to ensure that the development and use of land in the city contributes to the mitigation of and adaptation to climate change?

Habitats Regulations Assessment ('HRA')

- 7) The Plan makes several references to the delivery of a bridge connecting Tipner West to Horsea Island. For example, contributions towards such a bridge would be required by several policies, and the IQR indicates that the bridge is critical to the delivery of the Port Solent site allocation (in Policy PLP11). In that context, does the Plan express support for, depend on or require the delivery of the bridge? If so, can it be concluded that the Plan will not have likely significant effects on, or otherwise affect the integrity of, habitat sites¹?

¹ Any site which would be included within the definition at Regulation 8 of The Conservation of Habitats and Species Regulations 2017

- 8) To what extent does the Plan rely on the Imperative Reasons of Overriding Public Interest² decision for the North Solent Shoreline Management Plan [CE06] and subsequent strategies informed by it? Is there a sufficient prospect of the growth anticipated by the Plan being delivered in line with the measures supported by the Shoreline Management Plan and the subsequent strategies? If not, can it reasonably be concluded that harm to the integrity of habitats sites would be avoided?
- 9) How are the outcomes of the latest HRA [KD18], which was prepared following consultation on the Plan, reflected in specific policies? In particular, does the HRA appropriately consider the potential impacts on supporting habitat for Solent Waders and Brent Geese on Horsea Island?
- 10) Does the HRA otherwise comply with The Conservation of Habitats and Species Regulations 2017 and is it robust?

Sustainability Appraisal ('SA')

- 11) Are the methodologies used for the SA of the Publication Plan [KD09], the Addendum [KD11] and their previous iterations appropriate?
- 12) Have reasonable alternatives been appropriately considered and have adequate reasons been given as to why these have not been selected? In particular:
 - a. Are the reasonable alternatives sufficiently distinct to highlight different sustainability implications?
 - b. Which employment sites were assessed for their suitability for release of housing for spatial strategy option 3 of the Interim SA Report [KD08] and what were the reasons for discounting them for housing?
 - c. Were reasonable alternatives identified having appropriate regard to changing circumstances that occurred between each iteration of the SA? In particular, to what extent were the changes that followed the production of the SA of the Publication Plan, which included an increase to local housing need calculated using the standard method in the Planning Practice Guidance ('PPG')³ and a forecast surplus of employment land, considered when identifying reasonable alternatives for the SA of the Addendum?
 - d. What were the reasons for discounting housing growth option H4 and thereby the housing numbers specified for the sites at paragraph 5.57 of the SA of the Publication Plan?
 - e. Within the SA of the Addendum, are the development parameters for options 1 to 3 for Tipner West those specified in the table at paragraph 4.7 of the Tipner West Topic Paper [TP10]? What are the development parameters for the fourth option for Tipner West, and how does the preferred option inform Policy PLP3?

² Pursuant to Regulation 107 of The Conservation of Habitats and Species Regulations 2017

³ Reference ID: 2a-002-20241212

- f. Have reasonable alternatives to each of the Plan's strategic and non-strategic policies been appropriately considered?
- 13) Does the discussion on the preferred approach at Section 7 of the SA of the Publication Plan remain valid following changes to circumstances, such as the increase to local housing need after its production, and were these changes appropriately considered and reflected in the SA of the Addendum?
- 14) What is the intended purpose of the proposed monitoring framework at Table 2 of the SA Submission Statement [KD13]?
- 15) Overall, is it clear how SA has informed judgements about the growth promoted in the Plan, the choice of development strategy, and the strategic and non-strategic policies it contains?

Matter 2: Housing need and requirement

Issue: Whether the approach to calculating local housing need and the Plan's housing requirement is positively prepared, justified, effective and consistent with national policy.

This issue includes detailed consideration of Policy PLP16.

- 1) Has the calculation of local housing need (15,285 dwellings across the plan period) been undertaken appropriately using the standard method, the correct inputs and up-to-date evidence?
- 2) Is the housing requirement of 11,369 dwellings, as set out in Policy PLP16, soundly based? In particular:
 - a. Are changes to the housing requirement (and therefore tables 3.1 and 6.1, and the Housing Trajectory in Appendix 3 of the Plan) required due to changing circumstances following the Plan's submission, including changes associated with sites 'allocated' (by policies PLP3 to PLP15) and 'identified' (in Appendix 2) in the Plan?
 - b. Is setting the housing requirement below the local housing need figure justified?
 - c. Are the 15 percent non-implementation rates specified in Table 6.1 justified?
 - d. Is the windfall allowance specified in Table 6.1 justified?
 - e. Is the proposed stepped housing requirement justified?
- 3) Does the Plan identify land to accommodate at least 10 percent of the housing requirement on sites no larger than one hectare in accordance with paragraph 73(a) of the Framework?
- 4) Should the Plan set housing requirements for designated neighbourhood areas, in light of paragraph 69 of the Framework?
- 5) What are the anticipated implications for the Plan and the underpinning evidence if the housing requirement were to be uplifted to meet the local housing need figure?
- 6) Is Policy PLP16 otherwise positively prepared, justified, effective and consistent with national policy?

Matter 3: Employment target and supply

Issue: Whether the approach to establishing the Plan's employment target and the proposed supply of corresponding land is positively prepared, justified, effective and consistent with national policy.

This issue includes detailed consideration of Policy PLP25.

- 1) Is the Plan's target to provide at least 138,746m² of new employment floorspace, as set out in Policy PLP25, informed by robust and up-to-date evidence?
- 2) Are updates to the employment target (and therefore tables 3.1 and 7.1) required due to changing circumstances following the submission of the Plan, including changes associated with sites allocated and identified in the Plan?
- 3) Does the Plan satisfactorily address identified employment needs? In particular:
 - a. How have the locational requirements of different sectors been considered?
 - b. Would the employment development supported at the allocated sites provide an appropriate range and choice of sites, in terms of type, quality and size, to meet the needs of the area and accommodate the anticipated level of employment growth?
- 4) Is the amount of employment floorspace allocated to addressing Havant Borough Council's unmet needs sufficiently clear and appropriately reflected in the Plan?
- 5) Is the Plan sufficiently flexible to address any potential for changing employment needs, including for additional floorspace, over the plan period?
- 6) Would the intensification of existing sites provide a potential source of windfall supply of employment land? If so, would this be capable of addressing the anticipated shortfall against the employment target for manufacturing, warehousing, and research and development floorspace?
- 7) Is Policy PLP25 otherwise positively prepared, justified, effective and consistent with national policy?

Matter 4: Vision, strategic objectives and development strategy

Issue: Whether the Plan's vision, strategic objectives and development strategy are positively prepared, justified, effective and consistent with national policy.

Vision and strategic objectives

- 1) How do the overarching vision and strategic objectives in Chapter 2 of the Plan provide a positively prepared and justified approach for the city's future growth?
- 2) How are the individual visions for the strategic sites (in policies PLP3 to PLP9), the design vision (on page 34 of the Plan), the development strategy, and the policies in the Plan aligned with the overarching vision and strategic objectives?

Development strategy

- 3) Is the plan period of 2025 to 2040 justified? What are the anticipated implications for the Plan, and the underpinning evidence, if this were to be extended to achieve a 15 year plan period on adoption?
- 4) Do the strategic policies in the Plan set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes, employment, retail, leisure and other commercial development?
- 5) Is it clear how the chosen development strategy was arrived at and is it based on relevant and up-to-date evidence?
- 6) Is there sufficient flexibility within the development strategy to accommodate unexpected delays whilst maintaining the credibility of the strategy, including its ability to address housing, employment and other needs?
- 7) How have the potential impacts of the Plan beyond the city boundary been considered and reflected in the development strategy?
- 8) Have the sites allocated and identified for development in the Plan been appraised and selected using a robust and objective process?
- 9) Is the approach taken to identifying sites in Appendix 2 of the Plan positively prepared, justified, effective and consistent with national policy?
- 10) In respect of flood risk, is the sequential and exception testing that has been undertaken for the Plan robust and consistent with national policy?

Matter 5: Plan level infrastructure and strategic transport

Issue 1: Whether the approach to Plan level infrastructure provision is positively prepared, justified, effective and consistent with national policy.

This issue includes detailed consideration of Policy PLP50.

- 1) Have the impacts of the development anticipated by the Plan on supporting infrastructure, including healthcare, early years, education, leisure and sports facilities, telecommunications, security, waste management, water supply, and wastewater, been adequately assessed and evidenced?
- 2) To what extent does the development supported by the Plan rely on strategic flood defences? In particular:
 - a. What is the current and future programme of flood defence schemes in the city, what is their funding and delivery status, and would the schemes come forward irrespective of the development supported by the Plan?
 - b. Which sites identified and allocated in the Plan depend on the delivery of flood defence schemes, and are applications for development of those sites anticipated or required to include, directly provide or financially contribute towards the provision of specific flood defences?
 - c. Have the viability implications of flood defence schemes been appropriately considered for each of the sites allocated and identified in the Plan?
 - d. For each of those sites that would depend on flood defence schemes, when would the defences need to be completed for the construction of housing and other development to begin? Have the processes for the funding, design, approval and construction of flood defences, and associated flood mitigation measures identified in the Level 2 Strategic Flood Risk Assessment [CE04] such as land raising, been appropriately reflected in each Monitoring and Delivery Framework for the site allocations and in the Housing Trajectory?
 - e. Would any allocated or identified sites require flood defences to be provided that differ from the measures supported by the North Solent Shoreline Management Plan and subsequent strategies informed by it?
- 3) Is it clear how contributions towards the infrastructure identified in the Plan and the Infrastructure Delivery Plan [IN16] ('IDP') are intended to be calculated for development proposals? Are the policy requirements that specify that development should deliver or contribute 'proportionally' to infrastructure sufficiently clear, so it is evident how a decision maker should react to a proposal?
- 4) Should Policy PLP50 refer to the viability of development, particularly in relation to the potential inability for new development proposals to provide all infrastructure requirements?
- 5) Is Policy PLP50 otherwise positively prepared, justified, effective and consistent with national policy?

Issue 2: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to strategic transport implications.

- 6) Does the Strategic Transport Assessment ('STA') and its accompanying addendums [IN01, 02, 03a, 03b, 04, 05], including the February 2026 STA Addendum [IN05] that was prepared following consultation on the Plan, contain sufficiently accurate assumptions? In particular:
 - a. What housing and employment growth assumptions underpin the Council's transport evidence, and are those assumptions justified?
 - b. Is the infrastructure identified in the IDP accurately reflected in the transport evidence, particularly in respect of the timings for delivery?
- 7) With regard to the mitigation measures identified in paragraph 8.1.7 of the February 2026 STA Addendum to address impacts on the road network arising from the Plan's proposed growth:
 - a. When are the identified mitigation measures required to be delivered?
 - b. What interdependencies exist between mitigation schemes?
- 8) Is the modelling contained within the Council's transport evidence robust?
- 9) Have transport impacts beyond the city boundary been appropriately assessed?
- 10) Do the outputs of the modelling include resilience to account for any delays or non-delivery of infrastructure identified in the IDP and any other mitigation measures anticipated by the Plan?
- 11) Are the transport impacts arising from the growth supported by the Plan, as assessed in the Council's transport evidence, significant and, if so, would they give rise to unacceptable highway safety impacts or severe residual cumulative impacts on the road network at any stage during the plan period?

Matter 6: Optimising the use of land

Issue: Have all reasonable opportunities been explored and taken to optimise the use of land and meet as much of the identified need for housing as possible?

This issue includes detailed consideration of policies PLP1 (Part 7), PLP21 and PLP23.

Tall buildings

- 1) Will the Plan's approach to tall building development, including the spatial extent of the Opportunity Areas for Tall Buildings ('OATBs') shown on the Policies Map [KD04a], optimise the use of land and meet as much of the identified need for housing as possible?
- 2) Is the Plan's approach to tall building development, including the spatial extent of the OATBs, appropriately informed by supporting evidence, including the Tall Buildings Supplementary Planning Document [SPD02], the Tall Buildings Study [PCC02] and the evidence relating to housing density?
- 3) Does the evidence underpinning the Plan's approach to tall buildings appropriately explore the potential to optimise the use of land?
- 4) Is there justification for several of the OATBs identified in Policy PCS24 of the Portsmouth Plan [EDP01] not being taken forward for this Plan?
- 5) How has Part 7 of PLP1 and the spatial extent of the OATBs influenced the number of homes anticipated for the sites allocated and identified in the Plan, and the city's capacity for housing more broadly?
- 6) Does Part 7 of Policy PLP1 set out a sufficiently clear and positively prepared approach to how tall building proposals will be considered in relation to both sites within and outside OATBs?
- 7) Is Part 7 of Policy PLP1 otherwise positively prepared, justified, effective and consistent with national policy?

Residential density

- 8) Will the residential densities specified in Policy PLP21 and the corresponding density zones shown in Figure 6.1 of the Plan optimise the use of land and meet as much of the identified need for housing as possible?
- 9) Does the Plan provide for a significant uplift in the average density of residential development within centres and other locations that are well served by public transport, or has it otherwise been demonstrated that there are strong reasons why this would be inappropriate, in line with paragraph 130(a) of the Framework?

- 10) Are the residential densities taken forward by Policy PLP21 and the spatial extent of the zones shown in Figure 6.1 appropriately informed by supporting evidence, including the Urban Characterisation Study [VD03], past trends in densities as detailed in the Housing Background Paper [TP07], and the evidence relating to tall buildings?
- 11) Does the evidence underpinning the Plan's approach to minimum residential densities appropriately explore the potential to optimise the use of land?
- 12) Is there justification for several of the high density areas shown on Map 35 and promoted by Policy PCS21 in the Portsmouth Plan not being taken forward for this Plan?
- 13) How have the residential densities specified in Policy PLP21 influenced the number of homes anticipated for each of the sites allocated and identified in the Plan, and the city's capacity for housing more broadly?
- 14) How does the Council intend to approach decision-making where the indicative capacity of an allocated or identified site is below that promoted by Policy PLP21 for the area in which it would be located?
- 15) Is Policy PLP21 otherwise positively prepared, justified, effective and consistent with national policy?

Estate renewal

- 16) How will the Plan's approach to estate renewal optimise the use of land and meet as much of the identified need for housing as possible?
- 17) Is the Plan's approach to estate renewal including the identification and spatial extent of the Estate Renewal Areas specified in Figure 6.2 of the Plan, appropriately informed by supporting evidence, including the evidence relating to tall buildings and housing density?
- 18) Does the evidence underpinning the Plan's approach to estate renewal appropriately explore the potential to optimise the use of land?
- 19) How has estate renewal influenced the number of homes anticipated for sites allocated and identified in the Plan, and the city's capacity for housing more broadly?
- 20) Policy PLP23 supports comprehensive redevelopment of the Council's estates. In that context, what is the justification for including Paulsgrove Estate Renewal Area within the low density zone in Figure 6.1 of the Plan?
- 21) Is Policy PLP23 otherwise positively prepared, justified, effective and consistent with national policy?

Release of non-residential land for housing

- 22) Has the release of non-residential land been appropriately considered in determining the city's capacity for housing? In particular:
- a. Paragraph 7.6 of the Interim SA Report and paragraph A208 of the Plan indicate that the suitability of several employment sites has been considered for housing. Which sites have been considered, where is the reasoning set out as to whether they are suitable or not for housing, and have any been taken forward for housing in the Plan?
 - b. Has the potential release of employment land otherwise been appropriately considered, particularly in the context of the city's forecast employment land surplus?
 - c. Is the approach to safeguarding employment land in Policy PLP26 justified in the context of the forecast employment land surplus and constrained housing land availability position?
 - d. Has the potential for mixed use development within town centres been appropriately explored?

Other considerations

- 23) Are the Plan's policies that potentially have density or viability implications, such as those relating to affordable homes (Policy PLP17), housing mix (Policy PLP18), space standards (Policy PLP22), 20 percent biodiversity net gain (Policy PLP40) and tree cover (Policy PLP41), justified in the context of the proposed shortfall against local housing need?
- 24) Following the Housing and Economic Land Availability Assessment [HO04] indicating that there are insufficient sites to meet housing needs, was the assessment revisited in line with the PPG⁴, including by changing assumptions about the development potential of particular sites?
- 25) Have Council owned assets been duly considered in identifying potential housing sites?
- 26) Drawing together the responses in relation to the above questions for Matter 6, and all other relevant evidence, is it clear that all reasonable opportunities have been explored and taken to optimise the use of land and meet as much of the identified need for housing as possible?

⁴ Reference ID: 3-025-20190722

Matter 7: Sites allocated and identified in the Plan

Issue: Whether the sites proposed for allocation and identified in the Plan are positively prepared, justified, effective and consistent with national policy.

This issue includes detailed consideration of the sites 'allocated' by policies PLP3 to PLP15, and the sites 'identified' in Appendix 2 of the Plan.

Questions applicable to all sites

- 1) Since the submission of the Plan, has the Council resolved to approve or grant planning permission for any of the sites allocated or identified in the Plan, and does this indicate that the development anticipated for any of the sites should be updated?
- 2) Are updates required to any of the sites allocated or identified in the Plan to reflect changes to their availability, capacity, or for any other reasons since the Plan was submitted for examination?
- 3) How were the non-residential uses in Part 1 of each of the site allocation policies established? Is it sufficiently clear where, and what amount of, that non-residential development could be delivered within each site?
- 4) Several policies include criteria relating to masterplanning, design codes and the comprehensive development of the site allocations. What are the Council's intended approaches in these respects, would these be proportionate for all types and scales of development that may come forward within the allocations, and have any implications for the anticipated development delivery timescales been taken into account?
- 5) Has a consistent and proportionate approach been taken to the selection of the development requirements for each of the allocated sites?
- 6) Has a consistent and proportionate approach been taken to the selection of milestones specified in the Monitoring and Delivery Framework for each of the allocated sites?

PLP3: Tipner West

- 7) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular:
 - a. Has the presence and significance of heritage assets, including the extent of their settings, been appropriately addressed in the policy?
 - b. Is there sufficient certainty that Primary Support Area P60 can be replaced by suitable Solent Wader and Brent Goose habitat elsewhere?
 - c. Have the potential implications of policies in the Hampshire Minerals and Waste Plan [EDP05] been taken into account, including those relating to safeguarding land and infrastructure?

- 8) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 9) Does the policy set out appropriate development parameters and requirements? In particular, what is meant by the 'zone of visibility' identified in Part 3(d) of the policy and is its spatial extent sufficiently clear?
- 10) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, the Tipner West Delivery Approach paper [SS35] indicates that there is a funding shortfall of around £107m for the development supported by the policy. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?
- 11) Are the delivery assumptions regarding this site robust? In particular, have the following been taken into account:
 - a. The delivery considerations set out in the Tipner West Delivery Approach paper, including the processes and timescales for securing delivery partners/disposal of the site, the need for vacant possession of the site, and the timescales for relocating The Harbour School and other existing uses where relevant?
 - b. The replacement of Primary Support Area P60 with suitable habitat elsewhere?
 - c. The potential need for replacement minerals and waste infrastructure?
- 12) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP4: Tipner East

- 13) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 14) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 15) Does the policy set out appropriate development parameters and requirements?

- 16) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?
- 17) Are the delivery assumptions regarding the development of this site robust? In particular:
 - a. Is the outline planning permission⁵ for the transport hub extant and has progress been made on a reserved matters application? Do the permission, and any subsequent applications, have any implications for the delivery of the transport hub?
 - b. Is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- 18) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP5: Lakeside North Harbour

- 19) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 20) Would the site allocation make optimal use of land?
- 21) Does the policy set out appropriate development parameters and requirements?
- 22) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework? In particular:
 - a. Have the timescales and costs of delivering a new secondary access from Western Road been considered in determining when the employment floorspace may be delivered?
 - b. Have the timescales and costs of delivering improvements in relation to the Portsbridge Roundabout been taken into account, including the potential need for microsimulation modelling as indicated in the Statement of Common Ground ('SoCG') with National Highways [SCG28]?
- 23) Are the delivery assumptions regarding the development of this site robust?
- 24) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

⁵ Reference: 22/00024/OUT

PLP6: Portsmouth City Centre

- 25) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular:
- a. Has the presence and significance of heritage assets, including the extent of their settings, been appropriately addressed in the policy?
 - b. The SoCG with the Highway Authority [SCG17] indicates that further transport modelling and design work may be required to modify a road project associated with the City Centre North scheme⁶, and that the road project relies on the transport hub at Tipner East to mitigate potential highway impacts. In that context, can the scheme come forward without unacceptable impacts on highway safety or severe residual cumulative impacts on the road network?
- 26) Would the site allocation make optimal use of land and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular:
- a. How have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
 - b. Is the Plan positively prepared and justified in taking forward 1600 homes as a lower limit in the context of the City Centre North scheme being supported for 2300 homes?
- 27) Does the policy set out appropriate development parameters and requirements? In particular, are all the intended requirements for the different sites within the City Centre set out in the supporting text accurately reflected in the policy?
- 28) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular:
- a. Is it sufficiently clear when the City Centre North road project and the Tipner East transport hub need to be completed and has this been taken into account in determining when housing may be delivered?
 - b. The SoCG with the landowner of 200-204 Commercial Road [SCG30] indicates that there is no evidence to support the delivery of development there, and that this would depend on its future viability. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?
 - c. Table 19.1 of the IQR indicates that the best-fit development typologies from the Development Viability Assessment ('DVA') [HO15] for several sites within the city centre allocation would be unviable. In that context, is

⁶ Reference: 22/01243/CS3, which is subject to a resolution to grant permission

there sufficient certainty that development of those sites will come forward as anticipated by the Plan?

- 29) Are the delivery assumptions regarding the development of this site robust? In particular:
- a. Do the assumptions take into account securing a 'master developer' for the City Centre North scheme and its Programme and Milestones [SS38c] which, among other things, indicates the submission of a planning application in July 2027? What is that application anticipated to seek permission for?
 - b. Is there clear evidence that completions would begin within 5 years of adopting the Plan, as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- 30) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP7: Fratton Park & The Pompey Centre

- 31) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 32) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 33) Does the policy set out appropriate development parameters and requirements? In particular, is an off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park necessary, feasible and otherwise justified?
- 34) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?
- 35) Are the delivery assumptions regarding the development of this site robust?
- 36) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP8: St James' & Langstone Campus

- 37) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?

- 38) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 39) Does the policy set out appropriate development parameters and requirements? In particular, does it set out a sufficiently clear approach to open space and is this justified and consistent with paragraph 104 of the Framework?
- 40) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?
- 41) Are the delivery assumptions regarding the development of the site allocation robust? In particular:
 - a. Has the requirement for bird surveying and the potential timescales for delivering mitigation or avoidance measures for functionally linked land been appropriately considered?
 - b. Is there clear evidence that completions would begin within 5 years of adopting the Plan, as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- 42) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP9: Horsea Island Strategic Open Space

- 43) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular:
 - a. Has the role of the site in providing supporting habitat for Solent Waders and Brent Geese been appropriately taken into account?
 - b. To what extent may public access need to be restricted across the site to ensure the safe extraction of gases from the former landfill and reflect the extent of the Ministry of Defence's Exclusion Zone, and is there certainty that sufficient open space will be publicly accessible?
- 44) Would the site allocation make optimal use of land?
- 45) Does the policy set out appropriate development parameters and requirements? In particular, what is meant by the 'zone of visibility' identified in Part 3(i) of the policy and is its spatial extent sufficiently clear?

- 46) Are the delivery assumptions regarding the development of this site robust? In particular, the Monitoring and Delivery Framework for the site indicates that delivery of the strategic open space would be delivered post 2035. Has this been appropriately reflected in the delivery timescales for development that would rely on the use of the open space?
- 47) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP10: Land West of Portsdown Technology Park

- 48) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In particular, has the presence and significance of non-designated heritage assets been appropriately addressed in the policy?
- 49) Would the site allocation make optimal use of land?
- 50) Does the policy set out appropriate development parameters and requirements?
- 51) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework?
- 52) Are the delivery assumptions regarding the development of this site robust?
- 53) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP11: Port Solent

- 54) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 55) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular:
 - a. How have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
 - b. Does the evidence indicate that 500 or a higher number of homes may be developable at this site during the plan period?
- 56) Does the policy set out appropriate development parameters and requirements?

- 57) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular:
- a. Table 19.1 of the IQR indicates that the best-fit development typology from the DVA for the site would be unviable. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?
 - b. Paragraph 8.194 of the IQR indicates that the Tipner West to Horsea Island bridge is critical to the site's delivery. What are the reasons for this, where is this set out in the evidence, and is there sufficient certainty that development will come forward as anticipated by the Plan in that context?
- 58) Are the delivery assumptions regarding the development of this site robust?
- 59) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP12: St John's College

- 60) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 61) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 62) Does the policy set out appropriate development parameters and requirements?
- 63) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory?
- 64) Are the delivery assumptions regarding the development of this site robust? In particular, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- 65) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP13: Fraser Range

- 66) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved? In

particular, has the presence and significance of non-designated heritage assets been appropriately addressed in the policy?

- 67) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 68) Does the policy set out appropriate development parameters and requirements?
- 69) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, the SoCG on behalf of the landowner [SCG43] indicates that an application that is subject to a resolution to grant permission⁷ on this site has viability pressures, and page 148 of the IQR indicates the flood defences included in the scheme may be revised as a result. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?
- 70) Are the delivery assumptions regarding the development of this site robust? In particular, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- 71) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP14: The News Centre, Hilsea

- 72) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 73) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have the site's opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 74) Does the policy set out appropriate development parameters and requirements? In particular, is the policy sufficiently flexible to accommodate an appropriate range of uses on the site?
- 75) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the

⁷ Reference: 19/00420/FUL

point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, Table 19.1 of the IQR indicates that the best-fit development typology from the DVA for the site would be unviable. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?

- 76) Are the delivery assumptions regarding the development of this site robust?
- 77) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP15: Somers Orchard

- 78) Have constraints to the development of the site allocation been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 79) Would the site allocation make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery? In particular, how have opportunities and constraints informed assumptions regarding the potential extent of the developable area and the site's capacity for homes?
- 80) Does the policy set out appropriate development parameters and requirements? In particular, what is the justification for referring to tall buildings within the policy?
- 81) Is there sufficient certainty that development supported at the site would be viable, and associated necessary infrastructure can be delivered viably at the point it is needed, to achieve the milestones within the policy's Monitoring and Delivery Framework and accord with the Housing Trajectory? In particular, Table 19.1 of the IQR indicates that the best-fit development typology from the DVA for the site would be unviable. In that context, is there sufficient certainty that development will come forward as anticipated by the Plan?
- 82) Are the delivery assumptions regarding the development of this site robust? In particular, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that the development can otherwise be considered deliverable as defined by Annex 2 of the Framework?
- 83) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

Sites identified in Appendix 2 of the Plan

Please provide a response to the below questions for each of the sites identified in Appendix 2 of the Plan.

- 84) Have constraints to the development of each site in Appendix 2 been adequately considered and, where necessary, can appropriate mitigation be achieved?
- 85) Would each site in Appendix 2 make optimal use of land, and have all reasonable opportunities been explored and taken to maximise housing delivery?
- 86) Has the availability, viability and deliverability of each site in Appendix 2 been appropriately assessed and evidenced? In particular:
 - a. Table 19.1 of the IQR indicates that the best-fit development typologies from the DVA for the majority of the sites within Appendix 2 would be unviable. In that context, is there sufficient certainty that development of those sites will come forward as anticipated by the Plan?
 - b. For the applicable sites in Appendix 2, is there clear evidence that completions would begin within 5 years of adopting the Plan as set out in the Housing Trajectory, and that development of those sites can otherwise be considered deliverable as defined by Annex 2 of the Framework?

Matter 8: Housing policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the housing policies in Chapter 6 of the Plan.

This issue includes detailed consideration of policies PLP17 to PLP20, PLP22 and PLP24.

PLP17: Affordable Homes

- 1) Are the proposed affordable housing requirements within the policy justified and supported by the evidence? In particular, what is the justification for:
 - a. The tenure mix specified in Part 1(b)?
 - b. Requiring affordable housing contributions from older persons housing?
 - c. Viability reviews to be undertaken in Part 4?
- 2) Have the viability implications of the policy been adequately assessed for the different forms of residential accommodation to which the policy would apply?
- 3) Is there justification for the policy to not specify the minimum number of Social Rented homes required, as set out in paragraph 64 of the Framework?
- 4) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP18: Housing Mix

- 5) Have the viability implications of the policy been adequately assessed?
- 6) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP19: Housing for Specific Groups

- 7) Does the policy provide an appropriate strategy for addressing the needs of housing specific groups and is this supported by the evidence? In particular, is it sufficiently clear where different forms of housing will be supported and how development proposals will be assessed?
- 8) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP20: Houses in Multiple Occupation

- 9) Are the proposed criteria for development proposals for houses in multiple occupation justified and supported by the evidence?

- 10) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP22: Space Standards

- 11) Is the adoption of the Nationally Described Space Standards appropriately justified by evidence?
- 12) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP24: Gypsies, Travellers and Travelling Showpeople

- 13) Does the Gypsy and Traveller Accommodation Assessment [HO14] provide a sufficiently robust assessment of the needs of Gypsies, Travellers and Travelling Showpeople?
- 14) Is the Plan justified in not allocating permanent sites for Gypsies, Travellers and Travelling Showpeople during the plan period?
- 15) Is the Plan justified in not allocating transit sites and stopping places given the evidence of previous short-term encampments in the city in particular?
- 16) Is not seeking to address unmet needs in Winchester District justified?
- 17) Does the policy provide a positively prepared approach in setting criteria for sites to come forward and is it justified and consistent with the Planning Policy for Traveller Sites 2024?
- 18) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

Matter 9: Thriving Economy policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the employment, retail, culture and tourism policies in Chapter 7 of the Plan.

This issue includes detailed consideration of policies PLP26 to PLP30.

PLP26: Safeguarding Employment Land

- 1) Is it sufficiently clear how the policy should be applied in decision-making? In particular, is it clear when land or premises will be considered 'not fit for purpose', when a pragmatic approach may be taken to marking requirements, and how the quality of jobs and employment opportunities may be assessed?
- 2) Is Part 4 of the policy justified and effective in not allowing the loss of marine business premises on waterfront sites in any circumstances?
- 3) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP27: Employability and Skills

- 4) Does the policy clearly set out how applicants may demonstrate that each of its criteria are satisfied, and will all the criteria apply in all circumstances for the types of development specified in paragraph 7.39 of the Plan?
- 5) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP28 Town Centres

- 6) Does the Plan provide a clear and effective strategy for meeting the identified need for retail floorspace over the plan period, having regard to the findings of the Retail and Leisure Study Update 2024 [TE14]?
- 7) Is it sufficiently clear how the policy would operate for Core Commercial Areas in centres with different positions in the hierarchy in Table 7.2 of the Plan?
- 8) Is it sufficiently clear what is a 'core frontage' and where these are located?
- 9) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP29: Small Local Shops

- 10) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP30: Cultural and Visitor Economy

- 11) Is the policy positively prepared, justified, effective and consistent with national policy?

Matter 10: Climate Emergency policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to climate emergency Policy PLP2 and the flooding, coastal, energy and pollution policies in Chapter 8 of the Plan.

This issue includes detailed consideration of policies PLP31 to PLP37 and PLP2.

PLP31: Flooding

- 1) Are each of the policy criteria justified by appropriate evidence, relevant and proportionate for all types and scales of development proposal, and consistent with national policy and guidance, including the flood risk vulnerability classification at Annex 3 of the Framework?
- 2) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP32: Sustainable Drainage Systems

- 3) How will the policy be effective in managing the risks of surface water flooding, both on site and in the wider locality?
- 4) Is it sufficiently clear when and how each part of the policy is intended to apply to development proposals and are any intended requirements consistent with national policy, justified, and proportionate for different types and scales of development?
- 5) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP33: Sustainable Construction and Onsite Renewable Energy

- 6) Are each of the policy criteria justified by appropriate evidence, and relevant and proportionate for the types and scales of development to which they are intended to apply?
- 7) Is the policy consistent with national policy, including the Written Ministerial Statement entitled 'Planning - Local Energy Efficiency Standards Update' that was made on 13 December 2023, in relation to exceeding standards in current or planned Building Regulations?
- 8) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP34: Renewable Energy

- 9) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP35: Air Quality and Pollution

- 10) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP36: Coastal Zone

- 11) Is the spatial extent of the Coastal Zone justified, particularly in respect of the part of the zone in the vicinity of the St James' and Langstone Campus site allocation?
- 12) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP37: Contaminated Land

- 13) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP2: Climate Emergency

- 14) Are the requirements of other policies in the Plan accurately reflected in the detailed wording of Policy PLP2?
- 15) Is Part 1 of the policy intended to apply to all scales and types of development proposal? If so, is that approach sufficiently clear, proportionate and justified?
- 16) Is the policy otherwise positively prepared, justified, effective and consistent with national policy, taking the above questions for Matter 10 into account in particular?

Matter 11: Greening the City policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the green infrastructure, biodiversity, trees and hedgerows, and international nature designation policies in Chapter 9 of the Plan.

This issue includes detailed consideration of policies PLP38 to PLP46.

PLP38: Green Infrastructure

- 1) Is it sufficiently clear what types of green and blue infrastructure form the Green Grid and if (and how) this differs from the 'green infrastructure network' and 'Green Infrastructure' more broadly, which are also referred to in the policy and elsewhere in the Plan?
- 2) Is the approach to green infrastructure corridors justified and effective? In particular:
 - a. What are the reasons for distinguishing between existing and proposed green infrastructure corridors in Figure 9.1 of the Plan?
 - b. Is it sufficiently clear how delivery of the proposed corridors will be achieved?
 - c. Are the existing and proposed corridors intended to be treated as being in fixed locations? If so, how will development of strategic sites that may affect a corridor be considered?
- 3) Is it sufficiently clear when and how each part of the policy is intended to apply to development proposals and are any intended requirements proportionate for different types and scales of development?
- 4) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP39: Biodiversity

- 5) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP40: Biodiversity Net Gain

- 6) Is the policy compatible with, and justified in the context of, the statutory framework and national policy and guidance relating to biodiversity net gain, including the Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026?
- 7) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP41: Trees and Hedgerows

- 8) Is the 15% tree canopy cover requirement for major development at Part 1(c)(i) justified and likely to be feasible for development anticipated in the Plan?
- 9) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP42: Solent Waders and Brent Geese Sites

- 10) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP43: Recreational Disturbance on International Nature Designations

- 11) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP44: Nutrient Neutrality in International Natural Designations

- 12) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP45: Open Space

- 13) Paragraph 9.107 of the Plan and evidence such as the Portsmouth Open Spaces Assessment 2020 Addendum [GC09] and the Playing Pitch Strategy 2018-34 [GC03] indicate that there are deficits in types of open space beyond those specified in Table 9.1 of the Plan. In that context, will the policy effectively address the identified needs for different forms of open space?
- 14) Is the policy based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision over the plan period in line with paragraph 103 of the Framework?
- 15) Is Part 2 of the policy justified and consistent with paragraph 104 of the Framework?
- 16) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP46: Local Green Spaces

- 17) Is the designation of the Local Green Spaces specified in the policy consistent with paragraphs 106 to 108 of the Framework and justified by an appropriate methodology and evidence?
- 18) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

Matter 12: Infrastructure policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the infrastructure, highways and parking, public realm, communications and community and leisure policies in Chapter 10 of the Plan.

This issue includes detailed consideration of policies PLP47 to PLP49, and PLP51 and PLP52.

PLP47: Movement and Transport

- 1) Is it sufficiently clear when and how each part of the policy is intended to apply to development proposals and are any intended requirements proportionate for different types and scales of development?
- 2) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP48: Access and Parking

- 3) Is the policy positively prepared, justified, effective and consistent with national policy?

PLP49: Public Realm

- 4) Is it sufficiently clear when and how parts 1 and 3 of the policy are intended to apply to development proposals and are any intended requirements proportionate for different types and scales of development?
- 5) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP51: Electronic Communications and Utilities

- 6) Will Policy PLP51 be effective in supporting the provision of new and improved utility infrastructure to meet identified needs?
- 7) Is it sufficiently clear when and how parts 2 and 3 of the policy are intended to apply to development proposals and are any intended requirements proportionate for different types and scales of development?
- 8) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP52: New and Existing Community and Leisure Facilities

- 9) Is Part 2 of the policy justified and consistent with paragraph 104 of the Framework?

- 10) Are the requirements of the policy justified in relation to reorganisation of the National Health Service estate?
- 11) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

Matter 13: Heritage and Design policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to design Policy PLP1 and the historic environment policies in Chapter 11 of the Plan.

This issue includes detailed consideration of policies PLP53 to PLP56 and PLP1, excluding tall buildings, which are to be addressed in Matter 6.

PLP53: Historic Environment

- 1) How has the Portsmouth Heritage Strategy [HE02] informed the preparation of Policy PLP53 and other relevant policies in the Plan?
- 2) Does the policy accord with relevant statutory duties regarding the historic environment and is it consistent with national policy? How do any parts that repeat the Framework serve a clear purpose and does the potential for discrepancies impact on the effectiveness of the policy? For example, is the reference to Unidentified Heritage Assets in the glossary to the Plan consistent with national policy? What is the intended policy application in this regard, and will it be effective?
- 3) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP54: Listed Buildings

- 4) Does the policy accord with relevant statutory duties regarding the historic environment and is it consistent with national policy? How do any parts that repeat the Framework serve a clear purpose and does the potential for discrepancies impact on the effectiveness of the policy? For example, is Part 2 consistent with national policy insofar as it would refuse permission for all development proposals that would cause substantial harm to a listed building or its setting?
- 5) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP55: Conservation Areas

- 6) Does the policy accord with relevant statutory duties regarding the historic environment and is it consistent with national policy? How do any parts that repeat the Framework serve a clear purpose and does the potential for discrepancies impact on the effectiveness of the policy? For example, is Part 2(b) seeking to prevent any adverse impacts on the townscape and roofscape in a conservation area consistent with the approach in the Framework of establishing substantial/less than substantial harm and applying an appropriate weighting exercise?

- 7) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP56: Archaeology

- 8) Does the policy accord with relevant statutory duties regarding the historic environment and is it consistent with national policy? How do any parts that repeat the Framework serve a clear purpose and does the potential for discrepancies impact on the effectiveness of the policy? For example, is Part 1 seeking to permit proposals that do not cause harm consistent with the approach in the Framework of establishing substantial/less than substantial harm and applying an appropriate weighting exercise?
- 9) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

PLP1: Design

- 10) Are the requirements of other policies in the Plan accurately reflected in the detailed wording of Policy PLP1?
- 11) Is the policy consistent with national policy and will it be effective in respect of its management of the historic environment?
- 12) Is it sufficiently clear when Part 3 of the policy is applicable and where an applicant is expected to produce a design code for a site?
- 13) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

Matter 14: Housing land supply

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the identification of a sufficient supply of sites across the plan period.

- 1) Is the Housing Trajectory realistic and based on up-to-date evidence?
- 2) Are the assumed lead in times between the submissions of applications and the commencement of development, and the assumed annual build out rates for development, robust? In particular, what informed the rates and assumptions referred to at paragraphs 14.4 and 14.5 of the IQR?
- 3) Is there sufficient evidence to demonstrate at least a 5 year supply of deliverable housing land on adoption of the Plan?
- 4) Is there reasonable confidence that a 5 year supply would be maintained throughout the plan period? If not, how could this be achieved?
- 5) Will there be a sufficient supply of deliverable and developable housing land to ensure that the housing requirement would be met?
- 6) What flexibility and contingencies does the Plan provide if one or more of the sites allocated or identified in the Plan does not come forward to the Council's estimated timescales?

Matter 15: Viability and monitoring

Issue 1: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to viability.

- 1) Is the DVA proportionate and up-to-date having regard to relevant national policy and guidance, and has it taken full account of and appropriately influenced the policy requirements of the Plan? In particular:
 - a. Does the Addendum [KD02] introduce any changes that would affect the conclusions of the DVA?
 - b. Have there been any material changes in circumstances since the Plan's submission that would affect the conclusions of the DVA?
- 2) Are the policy requirements set at a level such that the cumulative costs would not undermine the deliverability of the development supported by the Plan?
- 3) How were the residual value figures for each site presented in Table 19.1 of IQR identified?
- 4) Sites PLP13, EC14 and EC11 in Table 19.1 of the IQR appear to be identified in the incorrect property value area set out in the DVA. Will this affect any other columns within the table, particularly the residual value outputs for these sites?
- 5) The Lakeside North Harbour and Land West of Portsdown Technology Park site allocations are not included in Table 19.1 of the IQR. Please provide information on the viability of these sites in a similar manner to the other site allocations in the table.

Issue 2: Whether the monitoring indicators identified within the Plan are effective

- 6) Are the proposed monitoring indicators, targets, triggers and actions specified in Table 12.1 of the Plan relevant, measurable and clearly time related so they can be monitored during the plan period?
- 7) Is it sufficiently clear how the triggers and potential actions for each Monitoring and Delivery Framework for the site allocations is intended to interact with the monitoring indicators in Table 12.1?
- 8) Are any other indicators necessary for monitoring purposes to ensure the soundness of the Plan?

Yours sincerely,

D McCreery, T Parton and M Philpott
INSPECTORS

19 August 2026