

Portsmouth Local Plan

Pre-Submission Response Form



Portsmouth
CITY COUNCIL

Portsmouth City Council has prepared a new Local Plan to guide development in the City up to 2040. This response form allows you to provide your views on the Pre-Submission version of the Portsmouth Local Plan (the 'Plan') along with its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment before it is submitted for examination to the Planning Inspectorate.

The consultation is open from 09 July 2024 to 23.59 on 03 September 2024.

Here is a link to the [Portsmouth Local Plan Evidence](#), which includes the Local Plan and other supporting documents.

Please contact the Planning Policy team by email at policyconsultations@portsmouthcc.gov.uk or phone 07990138226 if you have any queries or require this form in an alternative format.

Privacy Notice

Portsmouth City Council is the data controller of any personal data you provide on this form. It will only be used for the purpose of preparing the Portsmouth Local Plan and will only be held for as long as necessary for this purpose. Your comments and your name will be published on the City Council's website. We will make every effort to remove other personal details including telephone numbers, postal and email addresses and signatures prior to being uploaded. All representations received at this Pre-Submission stage will be sent to the Secretary of State for consideration at the Public Examination undertaken by an independent Planning Inspector appointed by the Planning Inspectorate (PINS).

For full details of how the council collects and uses personal data, please see the full [Data Protection Privacy Notice](#).

This survey uses software supplied by Evolutive. For full details of how Evolutive complies with the UK GDPR, please see their website and private notice ([Evolutive Website](#)).

How to complete this form

This form has three parts:

Part A Your Representation(s): fill in and submit a new response form for each representation you wish to make on a specific policy of the Pre-Submission Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment.

This is a technical consultation that focuses solely on legal compliance, compliance with the Duty to Cooperate and soundness. In order for the Plan to be legally compliant it needs to meet all legal and procedural requirements. All local planning authorities, including Portsmouth City Council, are under a Duty to Cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. The Government defines a Local Plan as sound if it is:

1. Positively prepared: providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
2. Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

Please provide all the supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Part B Personal Details: need only be completed once by each person responding to the consultation. Please provide your name, postal address, email address and any other contact information. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted.

Part C Diversity Monitoring: is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity and disability. This section only needs to be filled in once. Answering these questions allows the City Council to monitor responses from different groups and understand their views.

After this Pre-Submission consultation by the City Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

Part A: Your Representation

Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.

1. Please state below which part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment your representation relates to. *

Local Plan Policy x ▼

Policy *

Site Allocation Policy PLP11: Port Solent x ▼

2. Do you consider this part of the Local Plan and its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is:

2(a) Legally compliant: * Yes
 No

2(b) Sound: * Yes
 No

2(c) Complies with the Duty to Co-operate: * Yes
 No

3. If you have answered 'no' to any of questions 2(a) to (c) please give details of why you consider this part of the Local Plan or its Policies Map, Sustainability Appraisal and Habitat Regulations Assessment is not legally compliant, is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. *

The allocation is defined as "a strip of land to the south of the marina". Fig. 5.3 on page 97 embraces a large area already in productive use as a boatyard plus marine business premises but the policy deliberately seeks

to safeguard "marine and maritime employment" so the allocation must therefore be a subdivision of Fig. 5.3. At the Cosham drop-in session the RAPS chairman was told that the allocation is in fact the area currently deployed as a car park for the cinema, Boardwalk and David Lloyd gym and there have indeed been rumours to that effect circulating at Port Solent for some time. In which case, if there are to be 500 new residential units in that smaller area (almost the same number of homes as are in the entirety of Port Solent now) is there a presumption about what form they would they take? What alternative provision could be made for visitor parking, given that existing leisure facilities are also to be safeguarded, likewise the habitat supporting over-wintering flocks of Brent Geese? We note that delivery against this policy is pushed back to 2035-2040 but taking into account all the conditions that are listed that a developer would have to meet (5.18, 5.19, 5.24, 5.24), we believe that it is unlikely that anyone would be prepared to absorb the burden and risk.

If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Co-operate. Please be as precise as possible. *

RAPS has no reason to believe that any of this section falls short of legal compliance or the duty to cooperate and consult with local communities.

4. If you have answered 'no' to any of questions 2(a) to (c) please set out the modification(s) you consider necessary to make the Portsmouth Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at question 3 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. *

Please see the answer in (3) above. The policy needs to reflect what is feasible given the many safeguards and conditions stipulated, none of which we would wish to see dropped. There also need to be clearer statements about interdependences between PLP11 and adjacent Policies, PLP3, PLP5, PLP9, specifically any new transport link to Tipner West and the potential for further visitor numbers at Port Solent if the Horsea Island / Paulsgrove Country Park is completed.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? *

- Yes
 No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

RAPS has a long-standing relationship with the City Council with regard to planning initiatives that pose a risk to the success, character and functions of Port Solent. There are, among the residents, many who are qualified to contribute meaningfully to any hearing sessions.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B Personal Details:

If you are responding on behalf of an organisation, the postal address noted should be that of the organisation.

Please select here if an agent has been appointed for this representation

1. Personal Details

Title	Mr
Forename *	Christopher
Surname *	Clark
Job Title (where relevant)	Chair
Organisation (where relevant)	Residents Association of Port Sc
Postcode Look-up	9 Sonata House, Lock App... x ▼
Building Name	
Secondary Name	9 Sonata House
Street	Lock Approach
District	
Town	Portsmouth
County	Hampshire
Postcode *	PO6 4UZ
Telephone Number	
Email Address *	chriseeclark2010@gmail.com

Please note: anonymous or confidential representations cannot be accepted.

Do you wish to be informed:

When the Plan is submitted for
independent examination?

- Yes
 No

When the examination recommendations are published? Yes No

When the Plan has been adopted? Yes No

Of other planning policy work by the City Council? Yes No

Part C: Diversity Monitoring

If you are responding on behalf of an organisation, you do not need to answer these questions.

What is your sex?

What is your age group?

What is your ethnic group?

Do you consider yourself to have a disability, or a long-term illness, physical or mental health condition that reduce your ability to carry out day-to-day activities?

* - Compulsory Question.

If you would like a copy of your completed response form, please e-mail the Planning Policy team at policyconsultations@portsmouthcc.gov.uk