

Local Plans and National Planning Policy Framework: LPA Self Assessment

Entries in *red and italics* denote new requirements in the NPPF

1A: Achieving Sustainable Development

The presumption in favour of sustainable development and Core Planning principles (paras 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
<i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para 14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development?</i></p>	<p>Yes, the plan seeks to meet objectively assessed needs. A substantial evidence base informs the level of development planned for in the Portsmouth Plan, including the PUSH strategy, which is underpinned by a desire to improve the economic performance of the sub-region.</p> <p>The Portsmouth Plan positively identifies strategic sites and other development opportunities. Policies deal with contingencies.</p> <p>The overall stance of the Portsmouth Plan is pro-development and is in line with the overall tone of the NPPF. However, the plan was adopted pre NPPF and does not specifically state that there is a presumption in favour of sustainable development.</p>	Include model sustainable development policy in Development Control policies
The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)	<p>Does the plan meet up-to-date, objectively assessed development needs based on evidence?</p> <p>Does it take account of wider geographic areas eg cross boundary and strategic issues?</p> <p>Does it make effective use of land and specifically promote mixed use development?</p>	<p>The Portsmouth Plan is pro-development and is in line with the core planning principles in paragraph 17 of the NPPF.</p> <p>It is based on an extensive evidence base (http://www.portsmouth.gov.uk/living/3850.html) including for cross boundary issues, and housing and employment land needs, and associated infrastructure requirements have been considered beyond the city boundaries.</p> <p>Mixed use is specifically encouraged, particularly on the strategic sites.</p>	No change needed

1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21)	How far does the plan articulate a clear economic vision for the area? Are the policies flexible enough to accommodate requirements not anticipated in the plan and allow a rapid response to changes in economic circumstances? (21)	The Portsmouth Plan is based on the economic-led PUSH strategy, the aim of which is to support economic growth in the sub-regions. Policies in the plan include contingencies and flexibility, for examples suggested alternative uses for the dockyard should land become available.	No change needed
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	In supporting economic development to what extent does it take into account the matters raised in paragraph 21 of the NPPF? This includes local and inward investment; supporting existing business sectors and new / emerging sectors; clusters and networks of knowledge / creative/high technology industries; economic regeneration, infrastructure provision and environmental enhancement; new working practices.	The Portsmouth Plan is based on the economic-led PUSH strategy, which recognised and considered these factors. The plan is accompanied by an Infrastructure Delivery Plan, which sets out clearly the infrastructure needed to bring development forward.	No change needed
<i>LPA's should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose (22)</i>	<i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection?</i>	An employment land review was carried out to inform decisions on protection or release of employment sites. PUSH employment land needs figures have now been updated, so ELR needs review.	Review ELR to reflect PUSH figures, reviewing justification for protection of sites, to inform site allocations
2. Ensuring the vitality of town centres (paras 23-27)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Policies should be positive, promote competitive town centre environments, and set out policies for the	To what extent does the plan and its policies have regard to the criteria set out in paragraph 23 of the NPPF? This includes definition of networks and hierarchies;	The town centre policies in the Portsmouth Plan are in line with paragraph 23 of the NPPF	No change needed

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management and growth of centres over the plan period (23)	defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.		
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<p><i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i></p> <p><i>Have you identified primary and secondary shopping frontages?</i></p>	<p>The town centre policies in the Portsmouth Plan are based on a retail needs assessment, as well as employment land needs assessments. Leisure and Culture needs were also considered at the sub-regional level.</p> <p>Primary and secondary frontages have been identified for the city's town centres, and policies for their management have been set.</p> <p>The city centre boundary has been substantially enlarged to allow greater flexibility to accommodate town centre uses and a major expansion of the retail area is proposed through the Northern Quarter allocation.</p>	<p>none – enlarged city centre boundary, and other town centre policies provide flexibility to accommodate a range of town centre uses.</p> <p>In addition, work on the site allocations will review the need for and identify sites for individual retail, leisure, commercial, office, tourism, cultural, community services and residential developments across the city, including in town centres.</p>
Assess the impact of retail and leisure and office proposals (26)	Has it assessed the impact of the policy on existing, committed and planned public and private investment in a centre or centres in the catchment area?	The Plan does not currently set a threshold for impact assessments. The NPPF sets a default threshold at 2,500sqm.	An alternative local threshold for impact assessments will be considered in the town centres SPD.
3. Supporting a prosperous rural economy (para 28)			
This section of the NPPF is not relevant to Portsmouth			
4. Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Facilitate sustainable development whilst contributing to wider	<i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure to</i>	In preparing the Portsmouth Plan, transport needs were assessed in depth, for the sub-region, the city and the strategic sites more specifically. This	The overall strategy is compatible with this part of the NPPF.

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<p>sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and reduce congestion by supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.(30)</p>	<p><i>support sustainable development (31)?</i></p> <p>To what extent do the policies consider the matters set out in paragraph 32 of the NPPF. These include opportunities for sustainable transport modes; safe and suitable access; cost-effective improvements to the transport network.</p> <p>Does it have any policies which plan for ports, airports or airfields which are not subject to a separate national policy statement in accordance with the considerations set out in paragraph 33 of the NPPF?</p>	<p>includes extensive cross-boundary working. (LTP3, Harbours LDF study; Western Corridor Transport study).</p> <p>The Portsmouth Plan transport policy PCS17 shows a commitment to deliver a number of transport projects, including those that the city council is working on with partners in neighbouring authorities (e.g. BRT).</p>	<p>The local approach can be strengthened by developing criteria for transport assessments, in order to comply fully with para 32 of the NPPF. This will be explored through the transport & parking SPD.</p>
<p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p>	<p>To what extent does the strategy protect and exploit opportunities for the use of sustainable transport modes for the movement of goods and people? To what extent are developments located taking into account the criteria set out in paragraph 34 &35 of the NPPF? These include the efficient delivery of goods and supplies; priority to pedestrian and cycle movements and access to high quality public transport; safe and secure layouts; facilities for ultra-low emission vehicles; consider the needs of disabled people.</p> <p>To what extent do the policies aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities? (37)</p> <p>In relation to larger scale residential developments in particular, to what extent do the policies promote a mix of uses to provide opportunities to undertake day-to-</p>	<p>One of the Portsmouth Plan objectives is specifically about accessibility and integrated transport. Policies in the plan, such as the identification of high density development areas and the encouragement of small scale provision of local shops and services across the city, are based on accessibility and transport considerations. One of the principles of the plan was to locate major development in or adjacent to centres and public transport corridors.</p> <p>The large scale developments in the plan all promote a mix of uses.</p> <p>We have an adopted residential parking standards SPD. This needs updating to reflect NPPF criteria, and consider non-residential standards.</p> <p>The Portsmouth Plan transport policy PCS17 shows a commitment to deliver a number of transport projects, including proposals to improve two major transport interchanges in the city centre and for a major junction improvement that would facilitate a P&R facility.</p>	<p>The overall strategy is compatible with this part of the NPPF.</p> <p>In addition, we will produce a new SPD on transport and parking standards; in producing this, we need to make sure it takes account of the criteria in paragraph 39 of the NPPF.</p>

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	<p>day activities including work on site? (38)</p> <p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39)</i></p> <p>Does the plan identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice? (41)</p>		
5. Supporting high quality communications infrastructure (paras 42-46)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband (43)	To what extent has a ban been imposed on new telecommunications' development in certain areas or restrictions place? (44)	No ban has been imposed	No change needed
6. Delivering a wide choice of high quality housing (paras 47-55)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</i>	<p><i>What is your record of housing delivery? Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites;</p> <p><i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i></p> <p><i>c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</i></p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>Following a few years of close to target and over delivery, in 2010/11 delivery was very significantly below the target figure, mainly due to the continuing recession.</p> <p>The SHLAA has identified sites to meet the plan target for the whole plan period, but shows fewer sites than needed in the earlier plan period. They cannot be brought forward, as they are not deliverable sooner. As Portsmouth is a very tightly constrained city, with few available development sites, and reliant on strategic site, it is also not possible to identify alternative sites to fill this gap.</p> <p>Paragraphs 4.7 of the Portsmouth Plan explains the</p>	<p>The Portsmouth Plan allocates the strategic sites and the SHLAA has identified additional potential sites, which are being assessed for allocation in a plan to be adopted in early 2014.</p> <p>The annual SHLAA will identify sites, including the 5% buffer. We will also assess each year, whether we need to include the 20% buffer.</p>

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		evidence base behind the city's reliance on windfall sites.	Any opportunities to allocate potential housing sites can be explored through the Site Allocations process.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	Does the plan identify a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 (47)? <i>Does supply for years 6-10 include windfall sites; if so, to what extent is there "compelling evidence" to justify their inclusion (48)?</i>	Yes. Paragraphs 4.7 of the Portsmouth Plan explains the evidence base behind the city's reliance on windfall sites and this was accepted by the Inspector who conducted the examination in to the plan.	No change needed
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained (47).	Is there an up-to-date housing trajectory that illustrates progress with delivering the strategy in the plan (47)? Is there a housing implementation strategy describing how delivery of a five year supply of housing will be maintained to meet the housing target (47)? <i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i>	The Portsmouth Plan includes a housing trajectory in Appendix 3, and this is annually updated through the SHLAA and shown in the AMR. Policy PSC10 'Housing Delivery' in the Portsmouth Plan includes an implementation, delivery and monitoring strategy. Removal of national brownfield target will not affect housing land supply in Portsmouth, as the city is reliant on brownfield development in any case.	Keep housing trajectory under review in SHLLA & AMR, taking into account requirements for the 5% or 20% buffer. We will assess each year in the AMR whether we need to include the 5% or the 20% buffer and update the SHLAA to show our supply of sites.
Set out the authority's approach to housing density to reflect local circumstances (47).	Does the plan include policies on density of development To what extent do these reflect local circumstances?	Yes – PCS21. It reflects the urban nature of the area, densities of 40dph to over 100dph	No change needed
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand (para 159)	To what extent have you planned for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as families with children, the elderly and people with disabilities?) To what extent have you identified the size, type, tenure and range of housing required in particular locations, reflecting local demand (50)?	Housing needs were assessed taking into account market and demographic trends. As a result, policy PCS19 requires 40% family sized dwellings, which is based on assessed needs (see para 5.5 Portsmouth Plan). This is not linked to particular location, but it is not considered necessary to do so in the city.	No change needed
	<i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum</i>	Yes – PCS19 requires 20-30% affordable housing on all schemes above 8 units. This is based on needs and viability assessments (see paragraph 5.16 * 5.17 Portsmouth Plan), and the removal of	No change needed

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	<p><i>threshold?</i> <i>Is your evidence for housing provision based on up to date, objectively assessed needs (50)?</i></p> <p>Do these require on-site provision or if off-site provision or financial contributions are sought, to what extent can these be robustly justified and to what extent do they contribute to the objective of creating mixed and balanced communities (50)?</p>	<p>the national minimum threshold won't change this.</p> <p>The policy states a preference for on-site, then off-site provision, with financial contributions accepted as a last resort.</p>	
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).	n/a	n/a	n/a
LPAs should consider the case for setting out policies to resist inappropriate development of residential gardens (para 53)	<i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens?</i>	There are few properties in the city with gardens large enough to develop. It is therefore not a significant issue that needs addressing through a policy in the city. If proposals come forward, we will be able to refuse inappropriate development using other policies in the Portsmouth Plan.	No policy needed.
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	n/a	n/a	n/a
7. Requiring good design (paras 56-68)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	Does the plan include a policy or policies that reflect this objective? To what extent do design policies encompass the principles at paragraph 58 of the NPPF?	Yes, PCS23 is a comprehensive design policy, that encompasses the principles in para 58 of the NPPF.	No change needed
8. Promoting healthy communities (paras 69-77)			
What NPPF expects local	Questions to help understand whether	Does your local plan address this issue and	Do they affect your

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plans to include to deliver its objectives	your local plan includes what NPPF expects	meet the NPPF's expectations? How significant are any differences?	overall strategy? What is the suggested way forward to address this?
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	Does the plan include a policy or policies on inclusive communities? This includes: opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas (69)	There are no specific policies on inclusive communities in the Portsmouth Plan. However, this is not required by the NPPF. The Portsmouth Plan promotes mixed use developments and good design that considers crime reduction, accessibility and attractive public spaces; It protects open spaces and promotes shops and services across the city; An Area Action Plan has been prepared for Somerstown and North Southsea, to improve the quality of life for this community.	No change needed.
<i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i>	<i>To what extent do policies plan positively for the provision and integration of community facilities and other local services; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i>	The Portsmouth Plan addresses open space and local shops, but not community facilities in the wider sense, although these are considered in the IDP. PCS18 encourages small scales shops & services across the city. Spatial Strategy for Portsmouth seeks to reduce reliance on the private car and encourage development in locations with good transport links and access to local services.	Members have been asked to identify key facilities that are of value to their local communities. The results will inform the site allocations work, by considering protection of existing community uses and allocations for new or improved community uses.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	To what extent do policies identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area (74)? Does the plan include locally derived standards for provision of open space, sports and recreational facilities? To what extent do policies protect and enhance rights of way and access (75)?	A local assessment of green spaces was undertaken to inform the Portsmouth Plan, and identified spaces are protected in the plan. Standards are set in the plan for the provision of new open space in developments, based on this local assessment. There are no policies in the plan to protect rights of way, but this is not considered an issue in urban areas.	No change needed
<i>Enable local communities,</i>	<i>Do you have a policy which would enable</i>	The Portsmouth Plan includes general Green Space	Any Local Green Space

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<p><i>through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</i></p>	<p><i>the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p>protection in PCS13 bullet 1.</p> <p>While there may be spaces in the city that would meet the criteria for Local Green Space designation, there is no need or merit in making this designation, as PCS13 provides ample protection.</p>	<p>designation could be made as part of site allocations work. However, it is considered that the existing policy in the Portsmouth Plan (PCS13) provides sufficient protection for all the green spaces in the city.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p> <p>This section of the NPPF is not relevant to Portsmouth</p>			
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>			
<p>What NPPF expects local plans to include to deliver its objectives</p>	<p>Questions to help understand whether your local plan includes what NPPF expects</p>	<p>Does your local plan address this issue and meet the NPPF’s expectations? How significant are any differences?</p>	<p>Do they affect your overall strategy? What is the suggested way forward to address this?</p>
<p><i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i></p>	<p><i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>When setting any local requirement for a building’s sustainability, have you done so in a way that is consistent with the Government’s zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>Paragraph 2.30 of the Portsmouth Plan reflects the spatial strategy in the city to reduce reliance on the private car.</p> <p>PCS15 requires sustainable design and construction in new buildings. Although PCS15 and the rest of the Portsmouth Plan doesn’t actively encourage energy efficiency in existing building, but certainly doesn’t preclude it. Paragraph 4.91 recognises the need to deal with existing buildings also. Requirements set in the Portsmouth Plan are in line with national standards.</p>	<p>No change needed.</p>
<p>Help increase the use and supply of renewable and low carbon energy (97)</p>	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure?</i></p>	<p>This issue has been considered, but paragraph 4.94 of the Portsmouth Plan sets out that availability of sites for larger scale renewable and low-carbon energy generating technology are limited. Nevertheless, they will be explored through the site allocations (Para 4.94 Portsmouth Plan)</p>	<p>Explore location of facilities through site allocations work</p>

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	Does it identify where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers (97)?		
Minimise vulnerability to climate change and manage the risk of flooding (99)	Does the plan allocate, and where necessary re-locate, development away from flood risk areas (100)? Was the location of development informed by flood risk assessment and sequential test?	The Portsmouth Plan has a comprehensive Flood Risk Policy, which informs allocations and development management decisions.	No change needed
Manage risk from coastal change (106)	Does the plan identify where the coast is likely to experience physical changes and identify Coastal Change Management Areas? Is it clear what development will be allowed in such areas? Does it make provision for development and infrastructure that needs to be re-located from such areas? (106)	Portsmouth is a built up area, the vast majority of which must be protected from coastal change. There is one area, Farlington Marshes, where decisions on coastal change still need to be taken at the strategic level, and in due course the planning framework will reflect this.	No change needed now, but in future designation of Farlington Marshes may need to be reviewed.
11. Conserving and enhancing the natural environment (paras 109-125)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?	Do they affect your overall strategy? What is the suggested way forward to address this?
Protect valued landscapes (109)	Does the plan contain a strategy to create, protect, enhance and manage networks of biodiversity and green infrastructure? Does it minimize the loss of higher quality agricultural land? Does it give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs?	Yes, policy PCS13. n/a n/a	No change needed.

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<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<p>Does it ensure development is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution?</p> <p>Are sites suitable for the proposed use taking account of ground conditions, pollution from previous uses and any proposals for land remediation?</p> <p>Does it identify areas of tranquillity and protect them from noise? (109)</p>	<p>PCS23 Design & Conservation includes amenity considerations, which includes pollution and health.</p> <p>Contaminated land is an issue on sites across the city and many or most allocation sites will need to be remediated. This will be a material consideration in any case, but it would be preferable to have a policy in place.</p> <p>No areas of tranquillity are identified, but this would not be appropriate in an urban area.</p>	<p>Develop a contaminated land policy</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas,?</i></p> <p>Does the plan identify and map local ecological networks? Does it include policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species? Does it prevent harm to geological conservation interests? (117)</p>	<p>There are no Nature Improvement Areas in Portsmouth.</p> <p>The impact of the plan on nature conservation was considered in significant depth through SA and HRA of the strategy and the strategic allocations within it. Policy PCS13 specifically seeks to protect biodiversity. It also protects Portsdown Hill, SSSI designated for geological conservation interest.</p>	<p>No change needed</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>			
<p>What NPPF expects local plans to include to deliver its objectives</p>	<p>Questions to help understand whether your local plan includes what NPPF expects</p>	<p>Does your local plan address this issue and meet the NPPF's expectations? How significant are any differences?</p>	<p>Do they affect your overall strategy? What is the suggested way forward to address this?</p>
<p>Include a positive strategy the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<p>Does the plan identify heritage assets (buildings, monuments, sites, places, areas, landscapes)?</p> <p>Does it promote new development in ways that will make a positive contribution to character and distinctiveness? (126)</p>	<p>The city's conservation areas are identified on the proposals map and PCS23 Design and Conservation covers the protection and enhancement of heritage assets. We are aware of those assets that are most at risk.</p>	<p>No change needed.</p>
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>			
<p>The Hampshire Minerals & Waste Plan will deal with Minerals issues</p>			