



NOTICE OF MEETING

CABINET

MONDAY, 11 DECEMBER 2017 AT 12.00 PM

EXECUTIVE MEETING ROOM - THE GUILDHALL - FLOOR 3

Telephone enquiries to Joanne Wildsmith, Democratic Services Tel 9283 4057
Email: joanne.wildsmith@portsmouthcc.gov.uk

If any member of the public wishing to attend the meeting has access requirements, please notify the contact named above.

Membership

Councillor Donna Jones (Chair)

Councillor Luke Stubbs
Councillor Simon Boshier
Councillor Jennie Brent
Councillor Ryan Brent

Councillor Hannah Hockaday
Councillor Frank Jonas BEM
Councillor Robert New
Councillor Linda Symes

(NB This Agenda should be retained for future reference with the minutes of this meeting.)

Please note that the agenda, minutes and non-exempt reports are available to view online on the Portsmouth City Council website: www.portsmouth.gov.uk

Deputations by members of the public may be made on any item where a decision is going to be taken. The request should be made in writing to the contact officer (above) by 12 noon of the working day before the meeting, and must include the purpose of the deputation (for example, for or against the recommendations). Email requests are accepted.

AGENDA

- 1 **Apologies for Absence**
- 2 **Declarations of Interests**
- 3 **Record of Previous Decision Meeting - 28 September 2017 (Pages 7 - 12)**

A copy of the record of the previous decisions taken at Cabinet on 28 September 2017 are attached.

RECOMMENDED that the record of decisions taken by the Cabinet on 28 September 2017 be approved as a correct record and signed by the Leader.
- 4 **Appointment to Portchester Crematorium Joint Committee**

Following Councillor Robert New's resignation from the Portchester Crematorium Joint Committee a new representative from the Cabinet needs to be appointed.

Background: The appointment has to be of an executive member. This committee meets 4 times a year on Mondays for about an hour in Portsmouth, Gosport, Havant or Fareham. Councillor Frank Jonas is the other Cabinet representative.

RECOMMENDED that Councillor Hannah Hockaday replaces Councillor Robert New as one of Portsmouth City Council's two representatives on the Portchester Crematorium Joint Committee.

5 Local Plan Consultation Responses and Way Forward (Pages 13 - 170)

The report by the Assistant Director, City Development sets out the responses received to the recent Local Plan Issues and Options consultation and reports on the consultation arrangements themselves. It also advises on the government's drive for growth and the requirements of the Council to deliver sustainable development. It sets out a range of work to be undertaken in response to inform the new Local Plan and seeks Member endorsement of the approach.

The purpose of the report is to advise Cabinet of the outcomes of the public consultation on the Portsmouth Local Plan Issues and Options document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012; to update Members on relevant government announcements on planning; and to seek member endorsement for the way forward for the Local Plan.

RECOMMENDED that the Cabinet:

- (1) Note the summary of representations received during the Issues and Options consultation, and the issues raised;**
- (2) Endorse the approach to carry out and complete further technical work to inform the production of the new Local Plan;**
- (3) Delegate the approval of any necessary funding necessary to complete the Local Plan, to the Director of Finance and Section 151 Officer, in consultation with the Leader of the Council.**

6 Budget and Performance Monitoring Quarter 2 (Pages 171 - 182)

The purpose of this report is to update members on the current Revenue Budget position of the Council as at the end of the second quarter for 2017/18 in accordance with the proposals set out in the "Portsmouth City Council - Budget & Council Tax 2017/18 & Medium Term Budget Forecast 2018/19 to 2020/21" report approved by the City Council on the 14th February 2017.

RECOMMENDED that:

(i) The forecast outturn position for 2017/18 be noted:

(a) An underspend of £2,459,200 before further forecast transfers from/(to) Portfolio Specific Reserves & Ring Fenced Public Health Reserve

(b) An underspend of £1,035,500 after further forecast transfers from/(to)

Portfolio Specific Reserves & Ring Fenced Public Health Reserve.

(ii) Members note that any actual overspend at year end will in the first instance be deducted from any Portfolio Specific Reserve balance and once depleted then be deducted from the 2018/19 Cash Limit.

(iii) Directors, in consultation with the appropriate Cabinet Member, consider options that seek to minimise any forecast overspend presently being reported and prepare strategies outlining how any consequent reduction to the 2018/19 Portfolio cash limit will be managed to avoid further overspending during 2018/19.

7 Portsmouth City Council Revenue Budget 2018/19 - Savings Proposals (Pages 183 - 224)

The Director of Finance and Section 151 Officer's report is attached which is submitted to Council for approval.

8 Exclusion of Press and Public

“That, under the provisions of Section 100A of the Local Government Act, 1972 as amended by the Local Government (Access to Information) Act, 1985, the press and public be excluded for the consideration of the following item on the grounds that the report(s) contain information defined as exempt in Part 1 of Schedule 12A to the Local Government Act, 1972”.

The public interest in maintaining the exemption must outweigh the public interest in disclosing the information.

Under the Local Authorities (Executive Arrangements) (Meetings and Access to Information) England Regulations 2012, regulation 5, the reasons for exemption of the listed item is shown below.

Members of the public may make representation as to why the item should be held in open session. A statement of the Council's response to representations received will be given at the meeting so that this can be taken into account when members decide whether or not to deal with the item under exempt business.

(NB The exempt/confidential committee papers on the agenda will contain information which is commercially, legally or personally sensitive and should not be divulged to third parties. Members are reminded of standing order restrictions on the disclosure of exempt information and are invited to return their exempt documentation to the Local Democracy Officer at the conclusion of the meeting for shredding.)

<u>Item</u>	<u>Paragraph</u>
9 - City Centre Road (appendix 3 only)	3

(Paragraph 3 relates to Information relating to the financial or business affairs of any

particular person (including the authority holding that information)

9 City Centre Road Update and 'In Principle' Compulsory Purchase Order Resolution (Pages 225 - 246)

The report by the Director of Regeneration (which has exempt appendix 3) sets out the important role the city centre plays in accommodating the growth needs of the city. Given the substantial quantum of development which is allocated in the city centre new and improved infrastructure provision is necessary, including the reconfiguration of the highway network to the north of the city centre.

This report provides an update as to the progress of the related infrastructure project (the City Centre Road) and seeks approval of a series of recommendations to progress delivery of the City Centre Road project.

RECOMMENDED that the Cabinet:

1. Approve the land assembly strategy for the City Centre Road project as attached at Appendix 1.
2. Give delegated authority to the Director of Regeneration on the advice of the City Solicitor in consultation with the Leader with Portfolio responsibility for Planning, Regeneration & Economic Development to negotiate and complete acquisitions of legal interests, on the basis of the statutory CPO Compensation Code, in land required for the delivery of the City Centre Road scheme.
3. Give delegated authority to the Director of Regeneration to procure and appoint specialist advisers for:
 - Land referencing Agents
 - Specialist compulsory purchase surveyors
4. Approve the progress of all work necessary to establish a case for compulsory purchase of land required for the City Centre Road scheme.
5. Approve, in principle, the use of compulsory purchase powers for the acquisition of land to deliver the City Centre Road scheme (indicatively shown in red on the attached plan at Appendix 2) and note that the making of any compulsory purchase order will be subject to Members being satisfied in all respects that the criteria in paragraphs 3.19 have been met. Members are also asked to note that the redline area shown on the plan is currently widely drawn around the entire City Centre Road scheme application site area. It is not anticipated that all land/interests shown will need to be acquired to deliver the scheme however, a degree of flexibility prior to detailed technical approval of the scheme and its mitigation, is required at this stage. Officers will take all reasonable measures to minimise the need to acquire third party interests in accordance with CPO Guidance and the existing design approach to the scheme.

6. Note that Officers will need to seek a future resolution to grant the Director of Regeneration and the City Solicitor authority, in accordance with section 122 of the Local Government Act 1972, to declare that any land acquired or held and required for the delivery of the City Centre Road scheme may, where they conclude that it is no longer needed for its present purpose, appropriate the land for such statutory purpose as necessary to deliver the City Centre Road scheme, and to authorise the overriding of such easements, rights, or other adverse matters burdening the land, where that is needed to deliver the scheme, in reliance on section 203 of the Housing and Planning Act 2016.

Members of the public are permitted to use both audio visual recording devices and social media during this meeting, on the understanding that it neither disrupts the meeting nor records those stating explicitly that they do not wish to be recorded. Guidance on the use of devices at meetings open to the public is available on the Council's website and posters on the wall of the meeting's venue.

This meeting is webcast (videoed), viewable via the Council's livestream account at <https://livestream.com/accounts/14063785>

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Agenda Item 3

CABINET

RECORD OF DECISIONS of the meeting of the Cabinet held on Thursday, 28 September 2017 at 12.00 pm at the Guildhall, Portsmouth

Present

Councillor Donna Jones (in the Chair)

Councillors Simon Boshier
Jennie Brent
Ryan Brent
Frank Jonas BEM
Robert New
Linda Symes

37. Apologies for Absence (AI 1)

Apologies for absence had been received from Cabinet Members Councillors Hannah Hockaday and Luke Stubbs, and from Chief Executive David Williams.

38. Declarations of Interests (AI 2)

There were no declarations of members' interests.

39. Record of Previous Decision Meetings - 29 June and 27 July 2017 (AI 3)

The record of decisions of the previous Cabinet meetings held on 29 June and 27 July 2017 were agreed as correct records, to be signed by the Leader.

40. ECYP Scrutiny Panel's report into Child Sexual Exploitation (AI 4)

Councillor Neill Young, as Chair of Education, Children & Young People (ECYP) Scrutiny Panel, had sent his apologies for not being able to attend but panel member Councillor Suzy Horton represented ECYP in presenting their report and findings. She outlined the national and local context of the review into Child Sexual Exploitation (CSE) and was grateful to all the interesting witnesses who had contributed. The commitment of the wide range of agencies had been apparent but continued mapping and exchange of information was important. The panel had looked at how risks are addressed through CSE training provided by Portsmouth City Council and in schools, as well as with the taxi trade and there was the challenge of how to spread training to hotels. The panel had heard from service users and had found that informal settings and structures had been successful in encouraging interaction with agencies. The panel members had also been impressed by the work of the MASH team. Councillor Horton then presented the ECYP panel's recommendations and stressed that there was no room for complacency in tackling this issue, especially with the range of social media platforms expanding. It was hoped that the good take-up of training in schools would continue and not be adversely affected by the rise in academies. This is

a corporate responsibility there should continue to be rigorous engagement on the subject of CSE.

Councillor Jones, as Leader, thanked Councillor Horton and the ECYP Scrutiny Panel for their excellent work. Alison Jeffery, Director of Children's Services, then presented the response report and welcomed the review which had been helpful for her directorate. Alison Jeffery supported the recommendations (with the report giving commentary responding to each recommendation). She emphasised that continuing vigilance was important. The "Missing, Exploited and Trafficked (MET) multi agency coordination arrangements currently involved oversight over around 100 young people at any one time, looking at different forms of exploitation, criminal as well as sexual. Continuing training for all agencies to recognise and act on signs of exploitation was crucial; in schools this needed to reach primary as well as secondary schools. An updated assessment of the needs of young people in the city was being undertaken by Public Health for the Safer Portsmouth Partnership).

Councillor Robert New, as Cabinet Member for Environment & Community Safety, welcomed the work of the panel on this review and the robust recommendations as well as the important multi-agency approach for this national problem.

Councillor Donna Jones had met with the new Chief Superintendent Jason Kenny recently, who was consulting Children's Services on issues such as homelessness, taking a partnership approach. She welcomed embedding the work of the panel through the recommendations. Alison Jeffery also reported that Rich John had been appointed as the new Children's Safeguarding Chair, to take up post at the end of October, and this was welcomed by the Leader.

DECISIONS:

(1) The ECYP Scrutiny Panel was thanked for its work in undertaking the review.

(2) The Cabinet noted and supported the recommendations of the review, as listed at the end of the Scrutiny Panel's report at appendix 1 and the response of officers as set out in section 3 of the Director of Children's Services report.

41. Response report to EDCL Scrutiny Panel's Review on Smart Cities (AI 5)

Councillor Steve Hastings, as Chair of Economic Development, Culture & Leisure (EDCL) Scrutiny Panel, presented the panel's report. The EDCL panel had found this an exciting review, touching on all portfolios, with the subject matter being wider than just technology, requiring smart thinking and planning to encourage regeneration in a joined up way in the city. They had heard from Portsmouth City Council officers as well as external witnesses such as the University of Portsmouth and from a consultant, so were aware of other cities being in ahead in innovation, in particular Bristol. The links between technological advances, traffic management and tourism could be

enhanced and information was key to this in encouraging accessibility of routes and events for visitors and residents. There were also public health benefits to be further explored and increased interaction with tenants, so there should be regular updates to the portfolio holders on progress, monitoring of funding opportunities as well as take up the offer to visit to Bristol with other local authorities.

Councillor Donna Jones welcomed this comprehensive piece of work. Claire Upton-Brown, Assistant Director of Culture & City Development, presented the response report. The review had evidenced the wealth of work underway in the city but there was the need to join up the use of technology and information with the environment of the city to work more effectively. The invitation to visit Bristol was an opportunity to learn more, on a cross-departmental basis to drive forward and share initiatives.

Councillor Robert New, also welcomed the report and the idea brought forward by Councillor Hannah Hockaday (who had chaired the EDCL panel during the review) having visited the Smart Cities conference with Cllr Winnington regarding CCTV camera advances allowing remote access to information which was being pursued for smarter working by Community Wardens and which could link to traffic management.

Councillor Donna Jones endorsed the need for an officer working group to make Portsmouth a digital friendly and Smarter city, to include Claire Upton-Brown, Greg Povey and Louise Wilders. She supported the trip to Bristol and the bid by Greg Povey to the DCMS for the Local Full Fibre Network Programme for which Portsmouth could be a pilot area. There were also advances at the Port (aiming to be the first Gigabit Commercial Port on the South Coast) and funding opportunities were sent to the relevant directors and the Leader tracked these. Councillor Jonas hoped that the bid to the DCMS would be successful and Councillor Ryan Brent stressed the need for a whole city approach.

DECISIONS:

(1) The EDCL Scrutiny Panel was thanked for its work in undertaking the review.

(2) That the Economic Development Culture and Leisure Scrutiny Panel's recommendations were approved in line with the responses noted in item 4 of the report by the Assistant Director of Culture & City Development.

(3) It was agreed that there be a visit, arranged by the Assistant Director of Culture and City Development, to Bristol to consider some of the initiatives that have been implemented and further consideration be given to how the City develops a Smart City Strategy.

42. Revenue Budget Monitoring 2017/18 Quarter 1 - to end June 2017 (AI 6)

Julian Pike, as Deputy Director of Finance and Section 151 Officer presented the report which compared the position to the budget set in February. Councillor Ryan Brent asked that reference to the portfolio for "Children's Social Care" be amended to "Children & Families" in future.

Councillor Donna Jones, as Leader, spoke of the national problem for Adult Social Care funding for which there was constant lobbying of government and she was confident that this was being addressed by Councillor Stubbs, with vast improvements being made. There was also lobbying for Children and Families with the high burdens for complex needs, and the Leader was confident there was also an excellent team in place to address this. Councillor Ryan Brent responded that the pressures were understood due to high end external placements and good work was being undertaken to reduce the deficit; Councillor Jones thanked Councillor Brent for his involvement in this work.

DECISIONS:

(1) The forecast outturn position for 2017/18 was noted:

(a) An underspend of £1,529,600 before further forecast transfers from/(to) Portfolio Specific Reserves & Ring Fenced Public Health Reserve;

(b) An underspend of £684,600 after further forecast transfers from/(to) Portfolio Specific Reserves & Ring Fenced Public Health Reserve.

(2) Members noted that any actual overspend at year end will in the first instance be deducted from any Portfolio Specific Reserve balance and once depleted then be deducted from the 2018/19 Cash Limit.

(3) Directors, in consultation with the appropriate Cabinet Member, consider options that seek to minimise any forecast overspend presently being reported and prepare strategies outlining how any consequent reduction to the 2018/19 Portfolio cash limit will be managed to avoid further overspending during 2018/19.

43. Treasury Management Outturn Report 2016/17 (AI 7)

Julian Pike, as Deputy Director of Finance and Section 151 Officer, introduced this CIPFA required report, for which members were asked to note the indicators as set out in the appendices.

RECOMMENDED to Council that:

(a) The actual prudential indicators based on the unaudited draft accounts, as shown in Appendix A of the report, be noted.

(b) The actual treasury management indicators for 2016/17, as shown in Appendix B, be noted.

44. Treasury Management Mid-Year Review 2017/18 (AI 8)

Julian Pike, as Deputy Director of Finance and Section 151 Officer, introduced this report. He stressed that no additional borrowing was taking place but that the limits needed to be extended due to a property deal and with the formation of a new energy company by the Council.

RECOMMENDED to Council:

(1) That the authorised limit for external debt be increased by £10,600,000 from £607,555,000 to £618,155,000

(2) That the operational boundary for external debt be increased by £10,600,000 from £589,255,000 to £599,855,000

(3) That non-specified investments of up to £20m are permitted in the Council's subsidiary companies including but not restricted to MMD (Shipping Services) Ltd

(4) That the actual Treasury Management indicators for July 2017 in Appendix A be noted.

45. Changes to some Cabinet decision meeting dates (information item) (AI 9)

The Cabinet date adjustments were noted for these meetings:

Thursday 7th December moves to Monday 11th December at 12 noon.

Thursday 15th March 2018 moves to the next day, Friday 16th March at 12 noon.

The meeting concluded at 12.48 pm.

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Councillor Donna Jones
Leader of the Council

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Title of meeting Cabinet

Date of meeting 11 December 2017

Subject Local Plan Consultation Responses and Way Forward

Report by Assistant Director City Development

Wards affected All

Key decision No

Full Council meeting No

Summary

1. This report sets out the responses received to the recent Local Plan Issues and Options consultation and reports on the consultation arrangements themselves. It also advises on the government's drive for growth and the requirements of the Council to deliver sustainable development. It sets out a range of work to be undertaken in response to inform the new Local Plan and seeks Member endorsement of the approach.

Purpose of report

2. The purpose of this report is to advise Cabinet of the outcomes of the public consultation on the Portsmouth Local Plan Issues and Options document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012; to update Members on relevant government announcements on planning; and to seek Member endorsement for the way forward for the Local Plan.

Recommendations

Cabinet is recommended to:

- 1. Note the summary of representations received during the Issues and Options consultation, and the issues raised; and**
- 2. Endorse the approach to carry out and complete further technical work to inform the production of the new Local Plan; and**
- 3. Delegate the approval of any necessary funding necessary to complete the Local Plan, to the Director of Finance and Section 151 Officer, in consultation with the Leader of the Council.**

Background

3. At the meeting of 27 July 2017 Cabinet approved the publication of the Issues and Options document along with supporting documents for an 8 week period of public consultation.

4. The Issues and Options consultation document for the Portsmouth Local Plan was published for public consultation on 3rd August, with a closing date for representations of 28 September 2017. The appraisals and assessments that informed the Issues and Options document were also consulted upon at this time.

Consultation

5. The Issues and Options document and supporting material was the subject of public consultation from 3 August to 28 September 2017. The following measures were undertaken to publicise the consultation:

- a) Publication on the Council's website;
- b) Specific contact of statutory bodies, including neighbouring local authorities, Natural England, Highways England, Historic England and the Environment Agency ;
- c) Local press releases, and a formal notice in the Portsmouth News;
- d) Direct contact of all parties currently in the Planning Policy consultation database;
- e) Direct contact of all parties on the Action Portsmouth, Shaping Portsmouth and Portsmouth Together networks as well as the Council's Citizen's Panel; and
- f) Features on the Council's social media accounts (Facebook and Twitter).

6. In addition, paper copies of the main consultation materials – the Issues and Options consultation document, the Sustainability Appraisal and the Habitats Regulations Assessment were made available at all the libraries within the city and the civic offices. The Issues and Options document along with response forms was also sent to all community centres.

7. A series of five staffed public exhibitions was arranged across all parts of the city, held on weekday afternoons, evenings and on Saturday. In addition to the exhibitions, workshops were held for business groups and community associations. Officers were invited to meetings of the Milton Neighbourhood Forum and Portsmouth Fabian Society and attended to discuss the consultation. Finally, officers met counterparts from neighbouring planning authorities.

8. Arrangements were made for representations on the Local Plan and associated documents to be submitted online, by email and by letter with the option of using a consultation form that could be downloaded from the Council's website or obtained from the Planning Policy Team and completed by hand.

Effectiveness of the consultation

9. We are at the early stages of preparing a new Local Plan and so it is worth considering the effectiveness of the process as we go along, to evaluate performance and to see if improvements can be made in how the plan is prepared. To that end, a short summary of the consultation arrangements and outcomes has been prepared and follows as appendix 1 to this report. In total, 300 persons attended the exhibitions. In total, 302 businesses, individuals and organisations responded during the consultation period, with 268 making comments on the emerging Local Plan. This is considered a reasonable outcome but there may be ways in which future consultations can be conducted to improve this outcome and the appendix sets out some initial thoughts on how this could be achieved, which will be reflected on by officers going forwards. In particular, the analysis of respondents contained in the EqIA has highlighted the low number of responses received from those aged under 25 - further consideration will need to be given to how to ensure views of people of all ages is included in the process.

10. As well as the exhibitions, workshops were held for business groups and community associations, to explain the consultation itself and to capture some comments through structured discussions. These events helped to supplement the formal consultation responses, and added value to the process. Overall, it is considered such workshops can be a useful tool and should be considered for future engagement.

11. Regarding the consultation materials themselves, there is always a balance to be achieved between giving parties information to inform their responses, and (particularly in the case of individuals and others considering the consultation in their spare time) overloading people. The rationale of the consultation was that the Issues and Options document itself had sufficient information to cover the wide range of subjects in the Local Plan, with additional, more detailed information available in the supporting material, should people wish to access it and comment upon it. During the consultation itself, officers handed out summary leaflets at exhibitions, and the exhibition materials (which summarised the consultation) were placed online to provide people with a shorter summary. A few respondents to the consultation did however comment that they found the material difficult to access. While overall it is thought the approach used was appropriate for the consultation, future rounds could make use of additional accessible materials focussed on key issues.

Outcomes of the Issues and Options consultation

12. Some 1,800 individual representations were received from 268 respondents. In addition, a petition signed by approximately 160 persons was received. A schedule summarising all the representations received on the Issues and Options document is at Appendix 2 of this report. The full representations (with personal details redacted) will shortly be placed on the Council's website.

13. Significant issues raised in the representations include the following:

- a) **Concerns over the levels of housing development** proposed across the city. Many recognise the need for more housing, but most respondents questioned whether it was sustainable or possible to deliver the number of homes set out in the consultation document.
- b) Comments regarding the **significant ecological assets** in and around the city, and in particular the Brent Geese, Solent Waders and presence of European designated sites of importance for nature conservation;
- c) **Concerns over traffic congestion**, the capacity of **schools, health facilities and other infrastructure capacity** to meet existing needs and serve housing growth;
- d) Significant issues regarding the **suitability of proposed uses and delivery of strategic sites** identified in the consultation - Tipner, Port Solent and Horsea, St James and Langstone;
- e) Concern over the **condition of the City Centre** and Commercial Road in particular.

14. These and other significant issues raised in the representations are discussed below. Members should, however, review the full schedule of representations.

Responses to Issues and Options

15. The summary of representations set out in Appendix 2 pulls together the main points raised in the representations into 28 key issues. In addition, a full list of consultation responses (with personal information redacted) will be placed on the Council's website for transparency. However, Members are provided with the following headline summaries of responses to each question to inform consideration of this paper:

Vision and Objectives Twenty-four respondents disagreed with both the Vision and the Objectives, however forty-nine and forty-seven different respondents agreed with them respectively. Other frequent comments in this section focused on housing, development and roads.

Housing Many respondents suggested that the housing target was too high and infrastructure improvements to support housing development is required. However it was widely acknowledged that there is a need for more affordable housing. A petition with 163 signatories was submitted in support of the Portsmouth Labour Housing Forum affordable housing plan.

Housing Requirements Concern was expressed over the deliverability and appropriateness of planning for higher levels of housing growth. A number of parties noted the government consultation on a new methodology for assessing housing need.

Regeneration and the Local Economy Access to employment opportunities was considered to be a key issue - in terms of providing local employment, the required transport infrastructure connections and through improving skills (e.g. more apprenticeships). Responses wanted to see more diversity in Portsmouth's economy, including investment in technological and creative industries and opportunities for start-ups, as well as more of a spread of opportunities across the city. There was support for making the city centre the priority regeneration site for the city and building on economic opportunities presented by the University of Portsmouth and its graduates.

Employment Requirements There was greater support for seeking a higher level of new employment floorspace, rather than a selective release of existing employment sites for housing. This is considered to be the more sustainable approach to reduce out-commuting and to build Portsmouth's economy. However, some comments requested a more flexible approach to employment land in view of anticipated changes in office market demand and existing vacant employment land.

Retail and City Centre Comments focused on the need to improve the quality of centres (particularly Commercial Road) in terms of their urban realm, quality and range of uses and accessibility, in order to attract visitors. Overall, there was more support for relaxing existing controls to allow greater diversity in the mix of uses for the possibility of more cultural, dining and leisure uses, as part of creating an evening economy.

Retail requirements There were mixed views on locating additional retail floorspace in the city centre; while some feel it is the most sustainable location they question whether additional retail floorspace would be commercially successful there, or if any new retail floorspace in the city is necessary given national decline. Overall it was thought the emphasis should be on mixed uses. It was advised that the evidence base for retail should be updated regularly to take into account the latest economic forecasts

Tourism and Culture This topic attracted a wide range of comments and suggestions. Overall there was particular support for a more ambitious vision for the city, to include a stronger cultural identity with better recognition and co-ordination of all of Portsmouth's assets. Improving connections to and between key tourism attractions (Gunwharf Quays, Historic Dockyard, Southsea) and the regeneration of the city centre was seen as key for encouraging visitor spend.

Health, Well Being and Open Space Responses highlighted the need to protect and enhance existing open space and health facilities in the city. Access to facilities was also highlighted as important, in particular provision of high quality walking and cycling routes.

Heritage, Design and the Built Environment

This topic also produced a diverse range of comments and suggestions, with a majority of respondents supporting or commenting positively on the objective of conserving and enhancing the city's heritage. On the question of density, a high proportion of those who responded did not support an increase in residential densities.

Tall Buildings A range of views were expressed, with some resistance towards allowing any more tall buildings in the city, other respondents preferred them restricted to certain areas whilst others called for a relaxing of current defined locations, or a mix of both. Particular concerns were the need for high quality design; the safety of tall buildings; the impact on local transport including parking; and issues of social deprivation.

Natural Environment The view was expressed that the background information was lacking in detail with regard to the definition of the natural environment and that the city was not going far enough in scope or ambition. There was opinion that Portsmouth should conserve what it currently has; should stride for biodiversity gain; ensure access to natural environment for all; and work to connect up greenspaces through green infrastructure.

Transport Support for transport options was mixed, with many advocating a mixture of transport infrastructure improvements and promotion of active travel. Key themes included concerns about congestion, air quality and safety

Other Issues Commonly cited issues were infrastructure capacity in the city and the need for a new Infrastructure Delivery Plan; the lack of attention paid to education provision; and levels of student accommodation in the city. Flooding and flood defences were commonly raised; as well as concern that adaptation to climate change was not being addressed with enough attention. It was also expressed that the city should be more proactive with renewable energy generation and striving to meet low-carbon goals.

Identified Work Relatively few respondents commented on this, but further work on future healthcare and education requirements was thought necessary by a number of respondents.

Tipner Respondents generally supported the allocation of Tipner as a strategic site. However it was suggested that mix-use development should be considered and issues with access, contamination and meeting healthcare and education needs must be considered.

Port Solent and Horsea Island Responses to this were mixed. Some thought the area offered potential for development. New employment and maritime uses were less contentious, but additional residential development was subject of concerns over traffic, contaminated land, the capacity of infrastructure and the character of the area. The importance of the site for Brent geese and waders was highlighted.

St James and Langstone Campus This potential strategic site was commented on by a number of individuals. A significant amount of concern was expressed about traffic impacts, the capacity of infrastructure and potential damage to sensitive ecological assets on and near the site, amongst other issues. Reference was made to the previous consultation in 2014 and the 250 formal responses received at that time from residents and organisations. A full summary of those responses received and issues raised is contained in the report to the Cabinet Member for Planning, Regeneration and Economic Development of 2 December 2014.

Lakeside There were no objections to the continuation of Lakeside as a strategic development site, subject to environmental considerations. It is considered an excellent location for office-led development near the strategic highway network. There is some disagreement from the site management company in terms of the quantity of the proposed B1 office floorspace allocation; they request a more flexible approach to allow a wider mix of supporting uses .

City Centre

There was a detailed range of suggestions for the future of Portsmouth City Centre, encompassing the preferred uses, public realm needs, ideas to stimulate retail and employment uses, strengthened identity for distinct parts of the city centre and improved legibility of the connections between them. The city centre's key landowners set out their support for the regeneration of the city centre alongside their preferred approach to the future of their individual sites and the interrelationship with other parts of the centre. The need for a refreshed masterplan for the city centre was highlighted.

Cosham - Respondents called for balance between residential and commercial development along with balance of the retail offering in the town centre as there is a high proportion of certain outlets. There is also a feeling that the area would benefit from quality development.

North End - Responses centred around traffic congestion, poor air quality and that these issues should be tackled as a priority. The retail area was focused on as a zone that needs improvement, citing small retailers as a target group. The general theme focussed on business as opposed to residential investment.

Fratton - Main topics commented on for Fratton included retail offering, parking and air quality. It was viewed that the area is not a priority for development, but that the ASDA site and surrounds are in need of redevelopment and refurbishment.

Somerstown - Respondents highlighted that continued residential development in the area is preferential and sustainable travel options should be addressed. Other responses included the student population of the zone in both a positive and negative viewpoint.

Seafront There were an assortment of views about the future of the seafront and a range of suggestions for new uses that could be incorporated into the space including more leisure, shops and food and drink uses. Particular issues were the future of the sea defences; the need to improve connectivity with the wider city; the biodiversity value of the seafront; preventing over-development of the seafront; and the future of the Fraser Range area.

Other Strategic Sites or Broad Areas A few additional sites and areas were suggested including, the dockyard, the University area, The Hard (including Brunel House), Frasers Battery in Eastney, and the area around Airport Service Road. Others mentioned areas off Portsea Island including Paulsgrove, Drayton, Farlington and Portsdown Hill. Three respondents highlighted the northern part of the island, specifically Hilsea as a broad area for investigation.

Comments on other documents A limited number of comments were received, some respondents made suggestions relating to detailed points for inclusion in the background documents to inform the work going forward, including amendments to the Sustainability Appraisal. The importance of the Habitats Regulations Assessment was highlighted along with the sensitive ecological sites and species.

Other comments These ranged from reiteration that the plan should firstly meet the needs of current residents and address current restraints such as infrastructure capacity, to suggestions about work to complete and groups to be worked with as part of the Local Plan process going forwards. There were a number of issues raised relating to the consultation process itself, including the documentation produced, the feedback methods utilised and engagement with local people.

16. In addition to the formal representations, workshops were held with community and business groups. The main issues discussed at the community session were housing needs, student housing, skills, availability of suitable jobs, access to green space, medical facilities, community centres and public transport. The quality of the public realm was also a concern. The main issues discussed at the event for businesses were the availability of suitable employment land, the suitability of infrastructure, particularly transport, skills and education, and the attractiveness of the city centre as a place to invest.

Considering the Responses

17. The consultation has been a valuable exercise in capturing views on the future development of Portsmouth. The consultation has largely reiterated the scope of the identified issues and

concerns to be addressed in the Local Plan, with many useful additions and suggestions on how to consider them. An initial response to those considerations has been set out in the schedule of responses at Appendix 2, so parties who responded can see how their comments are being addressed.

18. The breadth and nature of the issues raised in the consultation will warrant further consideration and additional technical work, as part of the process of producing a sound and legally compliant Local Plan that will meet the tests of soundness set out in the National Planning Policy Framework (NPPF). The Issues and Options document itself contained a list of identified work (paragraph 4.107) thought to be required. No objections were received to that list, but additional technical work has been identified which is necessary to inform the new Local Plan.

19. Therefore, to address the issues raised in the consultation, the identified work to be undertaken includes but is not limited to the following:

- Further work on the levels of need for new housing, including specialist housing for groups such as older people and the potential for more innovative housing for younger persons;
- Assessment of infrastructure requirements, funding and delivery;
- Further work on transport issues, including an identification of Council priorities and principles to inform both the Local Plan and the Council's new Local Transport Plan;
- Further work to identify sites to deliver development and the production of a new Housing and Economic Land Availability Assessment;
- An assessment of the current and anticipated demand for employment floorspace and relationship with housing and other growth targets;
- Consideration of the approach to tall buildings, including the current focus on certain parts of the city;
- Review of retail policies across the city, including current town, district and local centre designations and boundaries;
- An open space study to identify key areas for protection and enhancement;
- A playing pitch study to understand the need and capacity of existing facilities;
- Technical work on air quality impacts across the city;
- An assessment of water supply and treatment;
- A viability assessment, to ensure that the costs placed on development do not prevent the strategy in the Local Plan being delivered;
- Further Sustainability Appraisal and Habitats Regulations Assessment work;
- Significant project delivery work to understand the potential, dependencies, timescales and routes to delivery for the identified strategic sites at the city centre and Tipner.

20. Some of this technical work requires collaboration with other departments, such as transport and housing. Preparing the Local Plan will require a collaborative approach across the whole authority.

Planning for Growth

21. Members will be aware that national planning policy for years has been focused on delivering growth. The report considered by Cabinet in July highlighted the need for the new Local Plan to meet future housing, employment and retail needs in a sustainable way and balance these against other supporting community needs, for example, schools and health facilities and with reference to other issues including environmental constraints.

22. The July Cabinet paper summarised options for development targets for new housing and employment and retail floorspace. Work prepared by the Partnership for Urban South Hampshire (PUSH) informed those options. A PUSH Spatial Planning Position Statement was published in

June 2016 which was supported by a number of technical studies including an assessment of housing need. That technical assessment estimated a need for 740 new homes a year in the city, but the Position Statement noted the estimated capacity of sites in the city was less than that, equal to 633 homes per year. Those two figures are reflected in the options published for consultation as part of the Issues and Options document, of 17,020 and 14,560 homes between 2011 and 2034 respectively.

23. In September 2017, the Government published a consultation paper setting out a new standard methodology for assessing housing need. This proposed methodology is largely based on household projections published by the Department for Communities and Local Government, with adjustments for the relative affordability of housing. The consultation paper also makes proposals for changes to the National Planning Policy Framework to accommodate this methodology and other proposals.

24. The outcome of the new methodology for Portsmouth is an assessed housing need of 835 dwellings per annum - higher than the Council's previous work identified. Although the figures have only been published for consultation, it is clear that the government expects local planning authorities to respond positively to evidence of high housing need, and councils will increasingly be judged on their performance for housing delivery.

25. As mentioned, a key driver for the proposed assessment of housing need is the household projections. These are periodically revised. The next iteration is expected at the end of 2018, but the position will need to be monitored.

26. The purpose of housing need assessments is to inform the planning process - i.e. the preparation of local plans, decisions on individual planning applications, and discussions with neighbouring planning authorities - and they are not the only factor in those processes. The Council already has evidence that the actual deliverable level of housing in Portsmouth is likely to be constrained by a number of factors, including the availability of land, impacts upon the environment, the capacity of infrastructure, deliverability of development and other site specific issues. However, part of the planning process is to test identified constraints and see if they can be overcome.

27. There is clear potential for two strategic sites - the city centre, and the city deal proposals at Tipner / Horsea, to deliver a significant amount of new development and these will play a key role in helping the city grow sustainably. Work on both these sites is making progress and Members will be aware of the recent consultation on the proposed new city centre road layout. Additional work will need to be undertaken to masterplan and demonstrate deliverability to ensure these schemes maintain momentum and establish a sound position for the new Local Plan.

28. Overall, the expectation in the current NPPF is clear that councils should respond positively to evidence of housing need. The consultation document proposes further requirements for councils to either plan to meet housing targets, or establish how they may be met across the wider area with neighbouring authorities under a proposed new Statement of Common Ground for planning. These are considered extensions of current policy and so the broad approach for the new Local Plan remains the same - how to best accommodate the growth of the city within its constraints, and the Council must do its best to explore all options in doing so.

29. This returns to the central message contained in the National Planning Policy Framework - the Presumption in Favour of Sustainable Development - which means local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate development should be restricted.

30. Given the above, it is proposed that the following actions are undertaken to address the issue of growth:

- a) Further work is undertaken on the capacity of sites across the city to accommodate development to meet identified needs;
- b) Given the significant potential of the sites at the City Centre and Tipner/Horsea, significant work needs to be undertaken to understand the potential, dependencies, timescales and routes to delivery for development at these locations and the interrelationship between these sites;
- c) The potential of areas which have been proposed for new development, including Hilsea, Buckland and Paulsgrove is investigated;
- d) A full review of infrastructure requirements and funding is undertaken;
- e) A review of the Community Infrastructure Levy charging schedule is undertaken;
- f) Further work to investigate the environmental capacity of the city to accommodate development and its associated impacts, such as transport, biodiversity, and flooding;
- g) Discussions are held with neighbouring authorities to determine what action can be taken under the Duty to Cooperate in response to the government's proposals for housing needs and the proposed requirement for a Statement of Common Ground.

Neighbourhood Planning

31. The representation received from the Milton Neighbourhood Forum stated the emerging Neighbourhood Plan will be ready for consultation later in 2017 but contained no mention of the potential site allocations. Concern was expressed that there was a lack of consistency and that statutory bodies need to work together. The concerns raised by the Neighbourhood Forum about residential development at St James and Langstone are summarised elsewhere in this report. However, there is a clear need to ensure there is appropriate dialogue and liaison between the Council as Local Planning Authority and the Neighbourhood Planning Forum.

Way forward

32. Significant further technical work is required to address the issues facing the city and inform a sound local plan. The initial list of work set out in paragraph 19 may not be exhaustive. Other work is likely to be required in response to changing circumstances, changes in legislation, priorities and opportunities. The purpose of placing this list of identified work in this report is to give Cabinet and other parties a sense of the amount of remaining work to be undertaken next year.

33. In addition to the technical work outlined in paragraph 19, the report also proposes wider actions for the Council in taking the plan forward. These were considered worth highlighting separately as they could lead to significant outcomes for the Council and the Local Plan. Finally, there is a need for engagement with the Milton Neighbourhood Planning Forum on their emerging Plan for Milton.

34. Under the current regulations, when the Council has prepared a local plan it intends to submit to the Secretary of State, it must undertake a formal period of public consultation, along the lines of that undertaken this summer, giving all parties the opportunity to comment. However, there is nothing to prevent the Council from holding additional consultations prior to that date. They could take the form of focussed consultations with particular groups and/or on particular issues, up to and including a full general consultation. As always, the need is to strike a balance between consulting and engaging with people and bringing forward a plan as quickly as possible. The intention is to actively consider when and how any additional consultation over and above our

legal requirements and commitments in the Statement of Community Involvement can inform the production of the Plan and make appropriate arrangements.

35. The current timetable for production of the new Local Plan is set out in the Council's Local Development Scheme. That timetable currently anticipates a formal public consultation on the draft plan in July 2018. However, this timeframe will need constant monitoring. It is considered extremely challenging, but potentially achievable, to deliver the technical work identified in this report within the envisaged timeframe. However, the actions set out in paragraph 30 of this report, although considered necessary, have the potential to involve a greater commitment from the Council. In addition, the implications of the government consultation on housing issues, including the proposed identification of higher levels of housing need, need to be considered. The government has also indicated it will publish amendments to the NPPF in spring of next year. If any of these factors necessitate a review of the Plan timetable then a revised timetable will be presented for Members next year, although the aim will always be to bring forward a new Plan as quickly as possible.

Conclusions

36. This report summarises the responses received to the Local Plan Issues and Options consultation and recent government announcements on housing. Cabinet are asked to note the response received in the consultation, and to endorse the approach to further technical work and actions by the Council to bring the Plan forward.

Equality Impact Assessment

37. A preliminary Equality Impact Assessment (EqIA) was prepared to accompany the July cabinet paper. Following the results of the consultation, a full EqIA has been prepared, which forms Appendix 3 to this report.

Legal Implications

38. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), together with Part 2 of the Planning and Compulsory Purchase Act 2004 set out the principle procedure and substantive obligations in relation to the preparation and adoption of the Local Plan. These steps are reflected in the narrative of this report.

39. The draft document may not be submitted to the secretary of state for independent examination unless it, and the procedural steps taken, complies with any relevant legal obligations, and the submitting authority thinks that the document is ready. On examination, the secretary of state, hearing representations and inquiring into the document, considers the soundness of the document. That is, that it is:

- i. Positively prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements (including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development).
- ii. Justified: the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence.
- iii. Effective: deliverable over its period and based on effective joint working and cross-boundary strategic priorities.

- iv. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. .

40. In order to minimise the risk of any legal challenge to the process adopted by the Council for the preparation of the Local Plan, members must, and must be seen to, have carefully considered and reviewed all of the representations received in response to the consultations undertaken in the course of preparing the plan.

41. In preparing and conducting the consultation, regard must be had to the public sector equality duty. This requires that in carrying out their functions, to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 to:

- i. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- ii. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- iii. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Director of Finance Comments

42. Whilst the specific recommendations within this report to note the summary representations and endorse the approach to completing the Local Plan do not directly have an adverse impact on Council resources, it is anticipated that the technical work required to inform the final production of the Local Plan, as presented within this report, may require additional one-off funding.

43. The additional cost of preparing and updating the necessary evidence and the level of external advice and temporary staffing required to complete the Local Plan is yet to be quantified, however it is recommended that the decision to allocate the appropriate funding be delegated to the Director of Finance and Section 151 Officer in consultation with the Leader of the Council.

.....'
Signed by (Assistant Director)

Appendices:

Appendix 1 Evaluation of Issues and Options Consultation Arrangements

Appendix 2 Issues and Options summary of responses

Appendix 3 Equalities Impact Assessment

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
Town and Country Planning (Local Planning) (England) Regulations 2012	http://www.legislation.gov.uk/ukxi/2012/767/contents/made

Appendix 1 - Evaluation of Issues and Options Consultation Arrangements

Introduction

The Issues and Options consultation for the new Portsmouth Local Plan was held for 8 weeks between 3 August and 28 September 2017. The Council undertook a number of consultation exercises. This note focuses on the exhibitions held to accompany, promote and explain the consultation.

The Exhibitions

Five staffed exhibitions were held at the following locations:

- Eastney Community Centre - Wednesday 2-8pm, 13 September
- John Pounds Centre, Portsea - Friday 2-8pm, 15 September
- Cosham Community Centre - Tuesday 2-8pm, 19 September
- Havelock Community Centre, Southsea - Thursday 3-8pm, 21 September
- North End Baptist Church - Saturday 10-2pm, 23 September

The aim was to maximise peoples' opportunity to attend, by holding exhibitions in a range of locations across the city to minimise the distance people had to travel, and to hold exhibitions across a mixture of afternoons, evenings and at the weekend.

Publicity Arrangements

The Issues and Options consultation as a whole was subject to a range of publicity and promotion exercises which are detailed in paragraph 5 of the main report.

The dates, venues and locations of the exhibitions themselves were promoted as follows:

- Details were placed on the Council's website;
- Over 300 contacts on the Action Portsmouth and Portsmouth Together networks were emailed;
- Notices advertising the event were sent to all the venues in the week before the exhibitions, for the centres to print off and display;
- A press release was issued detailing all the dates which resulted in an article in the [Evening News](#).

Outcomes

In total, 300 people attended the exhibitions, with figures for each of the venues as follows -

Venue	Afternoon	Evening	Total
Eastney	98	50	148
John Pounds	28	20	48
Cosham	26	9	35
Havelock	24	23	47
North End			22

"Afternoon" means 2-5pm, or in the case of Havelock, 3-5pm. "Evening" means 5-8pm.

Attendance

The numbers who attended the exhibitions varied widely. The exhibition held at Eastney Community Centre was by far the best attended. This may be in part because it was the first exhibition, but it is considered more likely that it was because of specific local concerns - firstly, the future of the St James Hospital / Langstone Campus site, and second, many people who attended had received a letter from a resident telling them that the future of Frasers Battery and the Caravan Park would be outlined at the exhibition.

For those exhibitions held during the week, attendance was higher in the afternoon than the evening, with an average of 63% of visitors attending the earlier afternoon session.

Although details such as age and gender of attendees were not formally recorded, it is considered that the majority of those who attended were over 50 years old.

Workshops

In addition to the exhibitions, workshops were held for business groups and community associations. Officers were invited to meetings of the Milton Neighbourhood Forum and Portsmouth Fabian Society and attended to discuss the consultation.

Evaluating the Exercise

Overall, it is considered that meeting 300 people to discuss the future planning of the city is a worthwhile outcome. Anecdotally, it is understood that 300 persons attending exhibitions is a reasonable outcome compared to similar exercises carried out for previous local plans in Portsmouth.

Council officers were seen to be engaging in local communities and talking to residents about their locality and the future of the city. This is extremely helpful for officers in understanding local planning issues.

Many of those who attended were individuals engaged with the wider civic life of the city - current and prospective PCC councillors, members of residents' associations or other groups - who are likely to be helpful in terms of getting the message out to the wider community.

Responses to Consultations

Another measure of the effectiveness of the publicity and engagement arrangements is the number of formal responses received through the consultation. In total, 302 businesses, individuals and organisations responded during the consultation period, with 268 making comments on the emerging Local Plan. This compares favourably with the responses received during the various consultations carried out for the previous Portsmouth Plan.

Consultation responses for Portsmouth Plan

Consultation	2006	2007	2008	2010Summer	2010 Winter	2011
Number of responses	139	180	118	285	248	313

Source: PCC Consultation Statement and Statement of Representation, 2011

While the number of responses does not signify endorsement of the emerging Local Plan, the fact that more responses have been received in this consultation than those carried out at a similar stage in the production of the previous local plan is evidence that the consultation arrangements are effective. However, that is not to say that improvements cannot be made. 302 responses is still a small number compared to the population of Portsmouth.

Future Consultations

Some points to be considered as the plan progresses and the Council considers arrangements for future consultation exercises are set out below:

- At the exhibitions, residents were asked how we could better promote future consultation events. Suggestions included placing adverts in nearby shops, using "site notices" in a similar way to planning applications, and using Express FM.
- Attendance at some exhibitions was boosted when they coincided with other events at the same venue to increase "passing trade" - this should be considered in future.
- Afternoons were better attended than evenings, but it will be important for exhibitions to be accessible to all.
- Exhibitions fulfil a certain role in consultations, ensuring there is access to technical information and key staff.
- The Issues and Options consultation was accompanied by workshops for business and community groups. The use of other complementary exercises should be considered for future consultations.

Portsmouth Local Plan Issues and Opportunities Consultation Summary of Responses

November 2017

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i. Introduction

The new Portsmouth Local Plan Issues and Options consultation was undertaken in August and September 2017. This document summarises the responses received. The responses are arranged into 28 chapters, covering the proposed Vision and Objectives, various themes, sites and broad areas, and the other documents, such as the Sustainability Appraisal and Habitats Regulations Assessment which accompanied the consultation.

The document focuses on the issues raised, and for that reason the respondents are not named. Where the identity of the respondent is particularly relevant to the issue being discussed, that organisation is named in bold. A full list of respondents is set out in the appendix to this document.

The document also sets out an initial officer response to the summary points. This is not the Council's final response to the subjects raised, but has been included here to help all parties understand how the work to be undertaken for the Local Plan will proceed.

1. Vision and Objectives

120 comments received regarding this topic

Question 1: Do you agree with the Vision and Objectives? If not, how should they be changed?

Vision

A Vision for Portsmouth

To make Portsmouth the premier waterfront city with an unrivalled maritime heritage - a great place to live, work and visit.

Overall, 49 respondents agreed with proposed vision - as a suitably aspirational but realistic choice. However, 24 comments did not think the draft vision was suitable. Suggestions for changes were as follows:

- Vision must be innovative, forward thinking and long term - not just about updating the existing plan.
- Make the vision less ambiguous - some confusion around the use of 'waterfront cities' and 'premier'; or whether Portsmouth needs to be 'the' premier waterfront city - rather than one of them.
- Ensure the vision links to the objectives.
- Make it measurable - the vision and objectives have not been stuck with in the past.
- Include great place to 'study'.
- The vision is important for promoting investment but also needs to address community priorities such as open space and a public transport network.
- Include reference to the fact that Portsmouth is the only island city in the country - e.g. 'To make the only Island City in the UK - Portsmouth - a better and fairer place to live, work, and visit.'
- Vision and objectives should be looking to transition Portsmouth into an energy efficient, affordable place to live.

Other comments:

- Recent development does not give the impression of 'premier waterfront city' - cites the student accommodation in Greetham Street.

Initial Council Response:

Overall it is considered the broad support for the proposed vision reflects its status as a long-term goal of the city. The suggested amendments contain a number of reasonable points but it is considered many are more appropriately dealt with through consideration of specific issues or ways in which the Plan is prepared, for instance the inclusion of measurable targets so that progress can be monitored.

Objectives

47 respondents supported the proposed Objectives. 24 did not agree with them. General comments included the following:

- Too vague and unlikely to be achieved. They could apply to any town and are not Portsmouth centric enough. Alternatively others felt the Plan could be more ambitious and courageous: "It feels like a plan from 30-40 years ago."
- Not all the issues and problems of the city are covered.
- Objectives seem to prioritise landowners above residents.
- Prioritise the objectives by urgency and include a timeline - consider how residents will know if the objectives have been achieved.
- Re-order and refocus to put greater emphasis on local communities and facilities. e.g. regeneration of current residential areas and better place making in new developments
- Reflect Portsmouth's sub regional role.
- Consider that growth is not mandatory.
- The document has too little focus on objectives 3-6, none on 7 and 8 and very little on Objective 2, so in its current form it is unbalanced and primarily focused on housing.
- Consistent funding is essential to achieve the Plan's objectives.

Comments were received on the individual objectives and their supporting text in the document:

Objective 1: To provide a range of housing in locations where people want to live

- How is it assessed where people want to live? How will housing be accessible to all?
- Change to: 'To provide a range of housing in appropriate locations consistent with all the objectives set out in this plan' / or 'that meets residents' needs.
- Include 'accessibility and affordability' or 'affordable housing'. This ensures that the range of housing specifically responds to housing need in the city.
- **Sustrans** recommend the inclusion of 'mixed-use developments' and housing density (also applicable to Objective 8).
- Address the aging housing stock- during the plan period half the city's housing will be over a hundred years old.
- Add an additional objective: 'to support harmonious integration between students and the city residents, ensuring that planning regulations protect a balanced demography with appropriate services, environmental protection and HMOs that are appropriate to size of building and area.'

Objective 2: To develop a successful and diverse economy with employment opportunities for all

Put this economy objective first as it drives the housing requirement

- Add 'with a focus on helping residents to progress beyond low skilled and low paid work'. This ensures that all Portsmouth residents can benefit from employment that fulfils their potential and provides a living wage.
- A greater focus on lifelong education.
- Be mindful of previous private investment which has left the city with ugly buildings.
- Gunwharf Quays is well placed to assist with Objectives 2, 3 (retail centres) and 5 (supporting infrastructure).

- Amend to: "to most cost effectively improve the quality of life of the Portsmouth stakeholders (i.e. the council tax payers)".
- Too much focus on the economy and not enough on making this a healthy and future proof place to live, work and visit.

Objective 3: To promote the viability and vitality of the City Centre, Southsea Town Centre and other smaller centres in the city

- Railways Pension Fund acknowledges and supports Objective 3.
- The city centre aspirations should be combined with the economic objective (2).
- Include focus on supporting independent retailers.
- Include covered market expansion for the city centre with a diversity of stalls.
- The city centre and stations need improved cleaning.
- Focus on the regeneration of the north of the city.

Objective 4: To protect and enhance the historic character, arts and culture of Portsmouth

- **The Theatres Trust** supports objective 4.
- **Historic England** welcome Objective 4, but state that "conserve" would be terminology more consistent with the NPPF than "protect".
- Needs to recognise that the protection of the city's heritage also benefits the quality of life for residents and provides an attractive location for businesses.
- The Plan should consider the location of hotel provision for quiet night's sleep - away from student routes.
- Include reference to the conservation and enhancement of heritage assets to contribute to a higher quality public realm.

Objective 5: To provide supporting infrastructure for Portsmouth's residents, businesses and visitors

- **Education & Skills Funding Agency** supports Objectives 5 and 6.
- Too little emphasis placed on current inadequacies in infrastructure provision before adding additional - outdated sewers and drainage, public transport shortfalls, diminishing numbers of GPs, a lack of school places and traffic issues.
- Consider provision of public toilets.
- Expansion of park and ride.
- Tackle parking provision - allow city wide residents parking.
- Consider longer term infrastructure needs beyond the plan period.
- Add another objective: To restore ageing sea-defences to provide flood protection for next 100 years whilst enhancing the sea-front for residents and visitors.

Objective 6: To support the health and wellbeing of residents by providing access to health care, protecting/enhancing open spaces, providing sports and leisure opportunities, tackling air pollution and providing for biodiversity

- This should be of primary importance as Objective 1.
- Support from **Sport England**, **Natural England** and **Education & Skills Funding Agency**.

- **Sustrans** welcome the inclusion of active travel in both Objective 6 and Objective 7.
- Add a dedicated objective to 'protect and enhance' the rich biodiversity of the city and its surrounds, protect ecology and biodiversity.
- **Natural England** suggests the objective is amended to: tackling air and water pollution and enhancing biodiversity.
- Aspire to increase the amount of trees.
- Add internationally recognised flora and fauna. **RSPB's** primary concern is that the objective provided recognition of the sites of nature conservation importance with the aim to protect and enhance these features as part of the Local Plan - including appropriate recognition to the internationally important designated intertidal habitats and the waders, waterfowl and terns these support within and adjacent to Portsmouth.
- Add 'reducing deprivation and inequality after 'access to health care, ' to ensure that these key wider determinants of health are considered.
- The **ESFA** recommends that education be referenced within Objective 6 and its supporting text, as the provision of high quality education facilities (including sports facilities) would help to meet this objective with regard to health and well-being and issues around social deprivation.
- Recognise that the locations of parks are not always conducive to safe exercise.
- Proposals to build on existing open space are contrary to this Objective (e.g. the St James Hospital site).

Objective 7: To make Portsmouth accessible with a range of sustainable and integrated travel options

- Add safety considerations, especially in relation to cycling.
- Greater promotion of sustainable transport and their infrastructure improvements.
- Amend to: 'To make Portsmouth well connected and accessible with a range of sustainable and integrated travel options.'
- Add reference to electric vehicles.

Objective 8: To provide an attractive, sustainable and safe city

- The issue of tall buildings attracted some comments - they should either be removed from the vision for the city for their poor amenity; aim for higher quality with linked open space provision, or just amend to 'taller' buildings.
- A greater focus on a safer community is needed with respect for each other and the city.
- The Council should enhance this objective by being an energy supplier.
- Add an additional objective: 'To ensure that local planning regulations effectively protect the local environment and amenities.'

Other comments:

- The council could employ local staff directly to vastly increase Local Authority property building.
- Greater guidance needs to be given in the design of windows
- Tree planting is required in Velder Avenue and clean-up properties there and on Eastney Road approach to St George's and the beach.
- Southsea must retain Knight and Lee

- Compulsory purchase for Local Authority housing in North End and Stamshaw; areas in need of development.
- Car free celebration days
- Why are some areas seen as issues and others as opportunities?

Initial Council Response:

The general comments and specific suggested amendments highlight the balance to be struck between the various issues to be considered by the Council in the production of this new Local Plan. Further work will be undertaken to consider the appropriateness of some suggestions and approaches, including whether the proposals warrant recognition in the Objectives.

Key Planning Issues and Strategic Options for Growth

2. Housing

161 comments received regarding this topic.

Do you agree with the description of housing issues? What other issues are there to consider?

24 respondents including the **Portsmouth Liberal Democrat Group, the Portsmouth Society,** and the **Portsmouth Fabian Society** noted their agreement with the description of housing issues set out in paragraphs 4.2 to 4.14

7 respondents noted that they do not agree with the description of housing issues set out in paragraphs 4.2 to 4.14.

Housing Numbers

A number of responses suggested that additional information is required to inform the projection of housing numbers and population growth:

- Evidence that the projected levels are likely to be achieved.
- Consideration of the impact of Brexit.
- Different sources quote different figures; what is the actual number?

PDPLA suggest a flaw in the projection for new dwellings. Growth has been extrapolated between 2000 and 2010 but doesn't identify that much of this growth is due to student numbers that have now peaked. Suggest revisiting the PUSH analysis to get the correct number of houses and associated investment from central government.

House Builders Federation agree with the use of the 2012 sub-national population projections as a starting point for calculating OAN. The increasing and high levels of overcrowding suggest uplift in housing supply is required. This would be more in line with the Government's recent consultation on the standard methodology for housing needs which indicates Portsmouth's OAN as being 840 dwellings per annum (dpa).

Winchester City Council supports PCCs commitment to provide at least the level of housing proposed in the PUSH position statement. Suggest that increasing housing supply to more closely meet the OAN is more of a priority than meeting the PUSH employment target in full.

Several responses suggested that the projected housing figures were too high for the following reasons:

- The city is already very densely populated; when will we be considered at capacity?
- There is a need to protect open spaces, the seafront and natural environment rather than build additional homes.
- Existing infrastructure cannot cope, let alone with additional houses.
- The city is at risk of flooding; irresponsible to build more houses at risk of flooding.
- The island nature of the city means there is physically no more room.

- The existing high population density brings issues of congestion, deprivation, ill health and social unrest. Accepting more housing would impact further on these issues.

It has been suggested that PCC should work with partners to commission independent evidence to challenge the housing targets from PUSH and central government; perhaps aim for an exemption from the targets.

A number of responses made suggests about how the housing need could be met:

- The Council should make an agreement with neighbouring councils to spread the load, particularly in relation to availability of suitable land.
- House Builders Federation suggests that there needs to be clear justification to explain why housing needs across the PUSH authorities are not being met. Consider working on a joint Local Plan with Gosport and Havant.

Initial Council Response:

The issues of housing need, housing targets and the interaction with other nearby authorities will need constant reassessment throughout the plan process. Towards the end of the Local Plan consultation the Government published a consultation paper "*Planning for the right homes in the right places: consultation proposals*" which included a number of proposals which, if implemented would have implications for the new Local Plan.

The responses made in this consultation, along with the outcomes of the government's consultation and changes to the National Planning Policy Framework (NPPF) which the Government has said will take place in Spring 2018, will inform the ongoing technical work and ultimately the draft Plan. For now, it is considered the relevant evidence on housing need available at this time for ongoing testing through the plan process are the estimates of need and capacity published in the PUSH Planning statement of 740 and 633 dwellings per annum, and the 835 dwellings per annum figure resulting from the Government's proposed standard methodology. Comments regarding the suitability of the method for calculating housing need will be considered further as part of that process.

Housing Location

A number of responses made suggestions regarding the location of housing:

- Affordable housing need could be met by reclaiming land from the sea.
- New housing should be built on genuine brownfield sites with green space and community facilities being protected.

Respondents also commented on a number of specific sites:

- Commercial Road should be designated for housing instead of retail.
- Redevelopment of the MOD site at Eastney should be supported to help meet housing need.
- Sites outside of the city could be used to provide lower density housing.
- Milton's green spaces should not be designated for housing; open space is important for health and wellbeing.
- Housing development at St James Hospital should not extend beyond the existing built footprint.
- Milton and Southsea seafront should be reserved for low density housing.

Initial Council Response:

The location of new housing will be considered further through the detailed consideration of each potential site. It is important, given the available evidence of high housing need, that the council considers the merits of all sites which could potentially deliver housing.

Housing Mix

Several responses discussed the types of houses that are needed in the city:

- One bedrooms for couples and singles
- More social housing
- Older peoples' sheltered accommodation
- Taller buildings
- Options for the homeless, including shelters
- Plots of land for self-builders and local developers
- Reduction in student housing and poor quality buy-to-let as this is crowding out other provision.

Portsmouth & District Private Landlords' Association (PDPLA) suggest there is a need for more quality shared accommodation to meet the needs of the transient workforce and those on low incomes. This would also free up other properties for families.

Portsmouth's Tackling Poverty Strategy Steering Group suggested consideration be given to the need for specialist housing e.g. for those with disabilities, the homeless and service families.

The Portsmouth Fabian Society queried whether current and housing need for refugees/ asylum seekers has been considered.

Respondents also made suggestions regarding mix of tenures required:

- Suggest zoning of areas to prevent imbalance of rental/ owner occupied properties.
- More rental stock required for both private and Council tenants so that overall prices reduce.

The National Landlords Association noted that there is a need for housing of all tenures given the added pressure from the change in the welfare system and a shortage of housing leading to increased rents.

Suggestions were also made regarding areas of further research:

- The impact of multiple occupancy dwellings, including HMOs, student accommodation and care homes, on housing need.
- Understanding the drivers of the private rented sector and the people who use this housing.
- Research into the links between population density, deprivation and low educational attainment.
- Some respondents also commented on the need to protect or enforce housing types and use:
 - Protect family housing with local amenities such as parks so that families can still live in the city.
 - Self-build housing should be tightly controlled.

- Student Accommodation.

The majority of responses regarding student accommodation criticised the level of supply:

- Questioning the continued provision of student halls. Concern that this will lead to oversupply if student numbers fall.
- Suggest that permission of student halls should be linked to number of HMOs as many students prefer to live in HMOs.

A number of respondents queried whether any oversupply could be converted to affordable housing or housing for the homeless.

Many of the respondents also commented on the suggestion that student accommodation will release family homes, querying how this will happen and whether it will happen at all.

A number of responses focused on the location of student accommodation:

- There is too much student accommodation on prime sites that could have been used to provide affordable housing for key workers.
- Student flats should be located on a specific campus to reduce number of student halls and HMOs in residential areas.
- Comments also discussed the impact that the student population and meeting their housing need has on the city.
- Suggest a limit on student numbers as this is putting a pressure on housing supply and the local economy as students are economically inactive.
- There should be a mechanism to make students pay council tax or contribute towards the city in another way such as labour.
- Priority for building accommodation should be given to residents and not students.
- Student housing should not be exempt from providing affordable housing.

Portsmouth Labour Housing Forum suggests there is some indication that purpose built student accommodation is putting upward pressure on rents in the private sector.

Respondents also suggested that there should be more restrictions in the student housing sector:

- Suggest restrictions on people owning multiple properties that are rented out to students.
- The design standards and quality of student halls should be under closer scrutiny.

The University of Portsmouth suggest the Student Accommodation SPD and model S106 Obligation should be updated to reflect how student accommodation will be secured and maintained for the University including levels of rent set. The University would welcome the opportunity to input into the research on affordability and to review approaches with the Council.

The Portsmouth Liberal Democrat Group, and others, suggested that there should evidence based approach to student accommodation to ensure the mixed and balanced communities.

The Portsmouth Labour Housing Forum suggest a certain percentage of rooms in new halls being allocated to local young people who have become homeless but wish to continue their studies.

Initial Council Response:

It is considered important, particularly in a constrained city such as Portsmouth, that the Local Plan has a strong evidence base on current housing issues. The *Housing Targets and Housing Needs* Background Paper outlined the need for additional research into the various components of housing need in the city and the suggestions made here will all be considered for inclusion in the scope of that research.

Student housing is a key concern. There are limits to what controls the planning system has in this regard, but the Council has undertaken further investigation into student housing issues, through the *Student Housing and Housing Targets* Background Paper and the separate identification and monitoring of student housing in the yearly Authority Monitoring Reports to better inform the approach in the new Local Plan. This will be considered further as the Plan progresses.

Houses in Multiple Occupation

Many of the responses regarding Houses in Multiple Occupation (HMOs), including those received from the **Friends of Old Portsmouth Association**, raised concerns about the current levels of provision being too high and the perceived issues associated with this:

- They provide sub-standard accommodation
- They attract transient communities
- Their numbers are increasing, seemingly unchecked
- Some respondents made suggestions regarding how HMO provision can be better regulated:
 - Restrict licences to 5 to 10 years so densities can be reduced over time and converted to family homes.
 - Introduce standards of maintenance and inspection so HMOs don't detract from the quality of a street.
 - Current licensed HMOs should be regulated by PDPLA.
 - Establish compliance checks for rubbish, noise etc.

PDPLA suggest that the Councillors, supported by local residents, have a NIMBY (Not In My Back Yard) approach to shared housing, using the excuse of striving for balanced communities.

Initial Council Response:

The current Local Plan aims to restrict concentrations of new HMOs. This approach will be revisited as part of the new Local Plan to ensure it remains the correct one. However, it is worth noting that many new HMOs have been granted permission under the current policy.

Housing Quality

A number of comments suggested that all housing, whether social or market, owner-occupied or rented housing should be built to high quality standards, including:

- Being warm, well insulated and safe from fire
- Being accessible and dementia friendly
- Built sustainably with high standards of energy efficiency
- Having high standards of amenity, including in areas of high density.

Several respondents, including the **Portsmouth Cycle Forum**, noted that there is insufficient high quality housing stock in the city. There is a lot of old, low quality stock that could be selectively replaced to meet modern standards.

A number of comments received discussed the perceived poor quality of rental housing stock. It was suggested that landlords should be held to account for the quality of accommodation and rent levels charged.

Housing density was also seen as an important issue:

Portsmouth's Tackling Poverty Strategy Steering Group suggested keeping higher density housing to areas of high sustainability/ accessibility, but only in areas where density is currently less than other areas of the city to avoid issues of deprivation.

The **RSPB** suggested that higher densities could reduce the land take up and impact on SPAs and their supporting habitats.

Initial Council Response:

The preference for new housing to be built to the highest standards is understood. The standards of new-build housing will be regulated by the relevant Building Regulations and other appropriate mechanisms. The approach taken by the Local Plan, including any requirement for homes to meet enhanced standards will be considered alongside evidence on the viability of development and other relevant factors.

Housing Affordability

Many agreed that affordable housing is a priority and made the following suggestions for addressing the need:

- Create an affordable housing SPD.
- Sell houses previously let to students to first time buyers.
- Developers need to include allocation of affordable housing within every development.
- Focus on delivering affordable family homes rather than luxury apartments.
- Use existing terraced housing stock to meet affordable need rather than renting these houses to students.
- Consideration of alternative build models e.g. kit homes.
- More council housing kept for rental.
- Stop relying on private developers to supply 'affordable' housing.
- Introduce council run building projects on break-even basis.
- Consider innovative ways of meeting urgent homeless need e.g. shipping containers.
- Reduce level of under occupancy of family homes by older people.

The Portsmouth Liberal Democrat Group, and others, suggested that viability assessments should be available for planning committee and the public to view and student housing should contribute towards affordable housing.

Portsmouth's Tackling Poverty Strategy Steering Group states that the Council should use its powers to ensure that no homes are left empty.

Rentplus noted that they agreed with the issues but that there should be more information about the scale and types of affordable housing need.

Respondents suggested that the following issues have added to the pressures on affordable housing:

- Artificially inflated house prices
- Greedy landlords in the buy to rent sector
- Right to Buy depleting the Council's rental stock
- Welfare reforms will exasperate the need for affordable housing and increase levels of homelessness.

Portsmouth's Tackling Poverty Strategy Steering Group suggest that measures of affordability should be modelled to show future trends and affordable housing needs to 2036.

The Portsmouth Labour Housing Forum submitted their Plan for Affordable Housing, supported by a petition signed by 163 individuals, which puts forward the following proposals:

- Refocus the Council's property investment strategy away from commercial property and towards the development of local affordable housing.
- Put pressure on the Council to thoroughly investigate the feasibility of using its arm's length property company to take a lead on development (with a focus on affordable housing) at each of the strategic sites identified in the Issues and Options Consultation paper.
- Any Council-led development should seek to secure the maximum possible affordable housing on the site. Under no circumstances should the level of affordable housing be below that required of a market development.
- Publish viability assessments in cases where the developer proposes to provide less affordable housing than required by local planning policy.
- Where a developer proposes to provide less affordable housing, instruct the District Valuer to conduct an independent viability assessment.
- Retain specific requirements for the provision of affordable housing on market developments.
- Require developers of new purpose built student accommodation to contribute towards the provision of affordable housing in line with other types of development.

Initial Council Response:

The Council's current policies on delivering new affordable housing are summarised in *Providing affordable housing in Portsmouth: A summary of affordable housing policies for developers*. The Council does deliver new affordable housing itself and works with other organisations to bring forward affordable housing. The production of a new Plan provides the Council and its partners with an opportunity to consider its priorities as a Housing Authority and the focus for housing delivery. The proposed further research on housing need will include affordable housing needs. The Government's Housing White paper, and subsequent document *Planning for the right homes in the right places: consultation proposals* indicate that the Government is considering amending national requirements regarding the process for preparing, and the publication and availability of viability assessments to inform planning decisions, particularly where the delivery of affordable housing is proposed to be lower than that required by policy. The outcomes of this are expected in spring 2018 and will inform the next stage of the new Local Plan.

Infrastructure to Support Housing

Many respondents, including the **Portsmouth Liberal Democrat Group** and the **Milton Neighbourhood Forum**, commented that existing infrastructure is not sufficient to meet the needs of the current population and additional homes should not be built until improvements are made to:

- Health facilities
- Air quality
- Roads
- Education provision
- Drainage/ Flood risk
- The sewerage system
- Open space provision
- Electric vehicle charging infrastructure
- Space to accommodate sustainable modes of transport

The Council's approach to securing funding to support such infrastructure improvements was also seen as important.

A number of respondents, including **Sustrans** and **Northwood Investments International Ltd**, noted that mixed-use development and proximity to amenities and a range of transport options is essential to reduce the need to travel/ ease congestion, to encourage community cohesion and stimulate a vibrant environment.

Initial Council Response:

Concerns over the capacity of infrastructure to meet current needs and the anticipated needs of future development are understood. These are both site specific and city-wide. Part of the process of considering a Plan is to identify constraints to development and to see if they can be overcome. The plan will be informed by an Infrastructure Delivery Plan which will identify the infrastructure required to support any new development, the timing of when it is required, the organisation(s) responsible for its delivery and the available funding.

**What housing options do you think the Council should follow in the new local Plan?
Are there any other options we should be considering?**

Affordable Dwelling Options

Affordable Dwelling Options:

- **AH1a.** Seek affordable housing on sites of 10 or more dwellings.
- **AH1b.** Seek the proportion and types of affordable housing in each development depending on housing need and viability.

Some support for Option AH1a:

- **Paulsgrove Residents Association** notes that the Council should 'require' affordable housing, not 'seek' affordable housing.
- Consideration should be given to housing mix with this option.

Portsmouth Labour Group Housing Forum, and others, do not support Option AH1b as it was suggested this would be unacceptable as it would encourage more developers to negotiate down their housing obligations.

PDPLA noted they are not in support of AH1a or AH1b. Suggested that any policy should:

- Be consistent to apply to all developments.
- Not allow student halls to be exempt.
- Developers should not have the option of removing the affordable element when 'not viable'.

Suggested that PCC will need to take a less onerous approach to affordable housing to ensure developers remain interested in proceeding.

Rentplus supported some aspects of options AH1a and AH1b:

- Affordable housing should be sought wherever possible, for all schemes that can viably support its delivery.
- Requiring all applications to demonstrate and negotiate on viability would be impractical and unreasonable for all parties concerned.
- The Local Plan should set an appropriate threshold below which no affordable housing will be sought; with clear reference to meeting local housing needs- the Council should be ambitious and consistent in this approach.

Rentplus recommend that affordable housing policies be informed by an up-to-date viability assessment that utilises the full range of affordable housing tenures set out in the Housing White Paper including rent to buy.

Initial Council Response:

The responses highlight the need for the Council to refresh its evidence on housing need and development viability. Both are proposed to be undertaken before the Plan is finalised. It is also important that any changes in the NPPF or Planning Guidance are reflected in the Council's approach. Specific points, including the potential for student housing schemes to contribute towards affordable housing will be addressed through that technical work.

Accommodation to Meet Specific Needs Options

Accommodation to Meet Specific Needs Options:

- **SH1a.** Require strategic development sites to include a range of housing including starter homes, self-build, housing for older people and supported housing.
- **SH1b.** Allocate individual smaller sites for specific housing needs.
- **SH1c.** A criteria based policy for meeting specific housing needs.

There was general support for policies that would meet specific needs. However, SH1a was the most popular option, with the following points made:

- This option will help lead to mixed communities.
- It is important that a range of needs, not just starter homes are met.

Responses were also received in support of SH1b, noting that:

- Smaller sites are important for meeting specific need as well as strategic sites.

- PDPLA note this option is more likely to meet local need than passing large sites to national developers.

Rentplus noted their support for a mixture of the three options. PCC should include criteria based policy along with the two other Options (SH1a and SH1b) to enable further sites to come forward that meets the needs not met through allocations. A combination of the options is recommended in line with Government's intentions to widen the definition of affordable housing.

Initial Council Response:

The broad preference for strategic sites to include a range of housing types is noted but the potential for individual sites to be allocated for specific needs will be investigated.

Sites for Travelling Communities Options

Sites for Travelling Communities Options:

- **TC1a.** Allocate a specific site where a need is identified.
- **TC1b.** Include a criteria based policy in the Local Plan.

Few respondents provided comments on travelling communities Options. One respondent supported Option TC1a and another supported both Options. Two respondents suggested that sites for travelling communities were not needed in Portsmouth and one queried whether there is a requirement to meet the needs of this group.

Initial Council Response:

Although this issue did not raise many responses there is a requirement in the NPPF that it is read in conjunction with the Government's planning policy for traveller sites. This issue needs further consideration to understand if the criteria-based approach in the adopted core strategy (Policy PCS22) remains the correct one.

Houses in Multiple Occupation Options

Houses in Multiple Occupation (HMOs) Options:

- **HMO1a.** Continue the approach of restricting houses in multiple occupation.
- **HMO1b.** Remove restrictions to houses in multiple occupation to maximise accommodation in the city.
- **HMO1c.** Increase restrictions on new HMOs in all or parts of the city.

There was some support for Option HMO1a to continue the existing approach.

A number of respondents, including **PDPLA** supported option HMO1b because:

- It will maximise accommodation in the city
- It could lead to reduced rents
- The current approach of demonising HMOs restricts the city's ability to adapt and grow

One respondent supported Option HMO1c and the extension of restrictions across all parts of the city. There was also support for option HMO1c for the following reasons:

- This should help reduce their number, but they should not be discouraged completely
- There is less need for them due to increased number of student halls.

Two responses did not support any of the HMO options and instead suggested:

- Increased restrictions on allowing HMOs in smaller homes will be used as a money making exercise to increase rents.
- Instead suggest provision of HMOs for low income single person households in areas that are not targeted for student housing.

Initial Council Response:

The support for option HMO1a, and the concerns over HMOs which arose in response to a number of questions in this consultation, are noted. The Council has already undertaken to prepare further evidence on the various elements of the housing market to inform the need for various types of housing and specialist housing. That evidence will inform a balanced decision on the right approach to HMOs which recognises the role they play in providing accommodation, and the need to maintain balanced communities.

Student Accommodation Option

Student Accommodation Option:

- **SU1a.** Continue the current monitored but unrestricted approach to the quantity of student accommodation.

Many respondents did not support Option SU1a and suggested that the current unrestricted approach should not be continued as we may already have too many student halls if student numbers fall.

A number of respondents suggested improvements and alternatives to Option SU1a:

- New student halls should not be exempt from supplying a proportion of affordable housing.
- Student accommodation to be encouraged around the University's city centre campus.
- Only allow development of student accommodation where the Council is satisfied that it will reduce the demand for family sized accommodation in the city.
- Consider restricting the quantity of student accommodation to University enrolment numbers so that no new blocks are built if sufficient demand cannot be demonstrated.
- **PDPLA** acknowledged that not all students want to, or can afford to live in student halls. Suggest monitoring and managing student developments in line with needs, or ensuring that any student accommodation can be used for other tenant groups should student numbers change.

University of Portsmouth object to the current 'monitored but unrestricted' approach to the quantity of student accommodation being continued. There is strong justification for early review of the Student Accommodation SPD and an up-to-date stronger student accommodation policy in the new Local Plan.

The University has objected to a number of planning applications since 2016 due to concerns about: accommodation suitability and adequacy of developer led schemes; the location of the schemes in relation to the Campus; the size and configuration of proposed accommodation; inadequate management arrangements impacting on student welfare.

The University's requirement for supply of student halls has now been met and there is no requirement to plan for increased accommodation beyond the University's own estate.

Concerned that the unmanaged approach will lead to:

- poorly designed student accommodation situated in inappropriate locations which are not accessible to campus;
- inappropriately managed accommodation which affects safety and welfare of students;
- development sites that do not proceed following grant of permission; underutilised accommodation;
- unaffordable accommodation which increases graduate debt can impact on welfare and can undermine the student's contribution to the city's economy.

This has impacts on the availability of sites for investment and alternative uses. The present policy framework offers a very low policy and scrutiny hurdle which is unacceptable from a public policy perspective.

A new Local Plan policy should address:

- The current supply position based on the University's requirements and to discourage purpose build accommodation unless supported by the University;
- Layout standards and management should be in accordance with ANUK/ National Code of Standards for Larger Developments for Student Accommodation Not Managed or Controlled by Educational Establishments. This is a key requirement which the University insists upon for all developments. The University can provide clear minimum requirements for inclusion in the policy to ensure compliance;
- What constitutes a preferred location for student accommodation- this should be defined as focusing upon the Guildhall and University Quarter;
- A requirement for applicants to demonstrate that the University has been consulted in advance on the submission, how the University's requirements have been considered; and how it fulfils these requirements.

Initial Council Response:

The Council's approach to this issue in the past has been informed by the understanding that there are limits to the extent to which student housing can be regulated through the planning system. However, the current strong activity from private providers in creating new Halls of Residence is clearly an important issue for the city and the new Local Plan. The delivery of new student accommodation is now being recorded and monitored separately and the available evidence on the likely impact upon the existing housing stock is set out in the *Student Housing and Housing Targets* Background Paper. There is a need for further dialogue with the University of Portsmouth to discuss the available options and see if agreement can be reached on the appropriate approach.

Other Options to Consider / Other Comments on Housing

A number of respondents, including **PDPLA**, made suggestions about how existing buildings could be better used to meet housing need:

- Use of permitted development to allow conversion of existing retail and commercial properties to residential.
- Demolish old and vacant buildings and replace with taller buildings.

PDPLA noted that a number of their members would be interested in selling their portfolio if they could invest in new build-housing in the city. This would give the benefit of freeing up existing homes for first time buyers and, if done properly, creating more affordable housing.

- There should be bolder proposals to develop the wasteland in the lower east side of Portsea island.
- Suggest CPO of Tipner site. Why has funding for Tipner been spent on other things? Will the site be delivered by 2034?

Initial Council Response:

These suggestions will be considered as the plan progresses. The evidence of high levels of housing need places the onus on the Council to consider how those housing needs could be met. The Council is working to deliver Tipner as quickly as possible and the issues surrounding delivery are discussed elsewhere in this document.

Housing Requirements

55 comments received regarding this topic.

What level of housing do you think we should be seeking to deliver in this Plan?

Housing Requirements Options:

- **HT1a** PUSH Spatial Strategy: Position Statement to 2034 - capacity for 14,560 new dwellings currently identified with work continuing to address the shortfall to meet assessed needs;
- **HT1b.** Objectively Assessed Housing need to 2034 - 17,020 new dwellings.

Neighbouring authorities **Fareham Borough Council** (BC) and **Havant BC** welcomed the Council's commitment to meeting the housing target set out in the PUSH Position statement (14,560 dwellings). Havant BC noted the recently published consultation on housing need and stated that all opportunities to provide housing should be taken up. **Gosport BC** noted the evidence on housing need across the wider housing market area and considered collaborative working across the sub region essential.

The majority of respondents called for lower levels of housing to be considered, due to reasons including the quality of life for residents; the potential impact upon the environment; and lack of opportunities to actually deliver housing given the city's constrained geography. A few respondents thought the higher option should be delivered, due to housing need. Others thought the housing target should be limited to the availability of suitable previously developed sites, (with an alternative estimate of capacity at 3,000 homes), or capacity of infrastructure. Retention of greenspace was mentioned as a priority. One respondent considered it impossible to consider the issue of housing numbers in isolation.

A number commented on the perceived imposition of housing targets on local authorities, and thought the provision of any new homes was difficult given the geography of the city and other factors such as infrastructure and quality of life should be taken into account.

Others commented upon the type of housing. Some urged the delivery of more affordable or other types of housing to meet local needs, and noted existing vacant or underused properties. Others noted the relationship between house prices and rents.

One respondent wanted student housing in designated areas to free up local housing stock.

Some development interests suggested the Council should take steps to maximise delivery of housing and consider other approaches and identify other opportunity areas.

Initial Council Response:

This was one of the most commonly responded to topics and it is understood to be crucial to the new Local Plan. There are two main elements – the technical exercise in quantifying housing need, and then the appropriate approach to be followed in the plan, taking into account sustainability and deliverability factors.

Regarding housing need, towards the end of the consultation the Government published a consultation on a new standard methodology for calculating housing need *Planning for the right homes in the right places: consultation proposals* which results in an assessed housing need for Portsmouth of 835 dwellings per annum – higher than the figures in the Issues and Options consultation. The Government has indicated that it will consider the results of the consultation and prepare an amendment to the NPPF in spring 2018. It will be crucial that the new Local Plan contains an appropriate, deliverable response to the requirements of the NPPF and clearly identifies the need for housing in this area using a defensible methodology. This will continue to be an important issue and will continue to be monitored as the Plan progresses.

Regarding the sustainability and deliverability of housing, a range of documents will consider this issue over the coming months. In the first instance, a Housing and Economic Land Availability Assessment will be published which sets out the availability of sites to deliver housing and economic land. That will consider the constraints faced by individual sites and test if they can be overcome. Other work, including an Infrastructure Delivery Plan, Viability Assessment, Sustainability Appraisal, Habitats Regulations Assessment and others will inform a decision on the amount of capacity, sustainability and deliverability of housing in the city.

3. Regeneration and the Local Economy

107 comments received regarding this topic.

Do you agree with the description of issues regarding regeneration and the local economy? What other issues are there to consider?

Comments were received on the identified main issues for regeneration and the local economy in Portsmouth as well as further points for the Plan to consider, under the subjects below:

Access to employment

There were a number of comments concerning the balance, or prioritisation, of the relative levels of employment and housing and the potential consequences of these decisions:

- Creating more homes than local work would lead to more congestion and pressure on local infrastructure.
- Out-commuting suggests that the higher paid, professional roles for residents are not found within the city.
- Focus on local opportunities and building immediate local economies so people can live and work in an area of their choice with access to services.
- Housing built to attract higher level workers in the city are sometimes purchased as holiday, student or second homes; include policies to keep the higher quality housing for local residents.
- Converting business space to housing as well looking at the issue of out-of-city commuting is a contradiction.

Congestion was suggested to be the key restriction on the city's economy, and that positive growth would not occur without a focus on sustainable travel. Reduce reliance on cars through expanding public transport provision and other infrastructure to employment sites (inc. the ports) including night-time services. For example the MoD site on Portsdown Hill isn't accessible by public transport.

Educational attainment and skill shortages

- It was observed that the issues surrounding educational attainment, low earnings and skilled workers living outside of the city have changed little in the forty years.
- One comment suggested that low attainment is a symptom of the "low-achiever culture" in the city.
- As many residents are unable to move on from low paid employment, the focus should therefore be improving skills, particularly focusing those living in areas of deprivation.
- A key issue is thought to be provision of education services and local access to it, as well as the lack of school places at secondary level; without the requisite number of schools and classrooms, educational achievement is bound to be poor.
- It was suggested that poor employability in the city can be linked to the lack of vocational further education courses. Ideas include restoring business-related study courses for adults (e.g. at Highbury College), having more skills based apprenticeships for younger people linked to city businesses and using grant monies to subsidise vocational training.
- Aiming to retain Portsmouth University graduates in the city is supported; there are currently thought to be few opportunities for them.

- It was questioned whether the Higher Education World ranking position for the University of Portsmouth is correct.

The Local Economy

- A weakness of the economy is the lack of 'makers' as Portsmouth's manufacturing is 'assembly' rather than bottom up 'design and build'. This is keeping skills and wages low.
- Consider how to attract more professional, manufacturing, science and engineering companies, technology-based and creative businesses.
- Investigate why financial services do not locate in Portsmouth.
- Invest in and generate opportunities which will generate higher paid jobs.
- Build on the partnership with the University - particularly to attract creative businesses; integrate the University into the city more - for example by using student halls more for tourists out of term time and encouraging more student involvement in the city.
- Although marine sector growth has occurred in the M27 corridor, it is considered that marine related employment in Portsmouth has suffered a substantial decline in recent years e.g. decline in shipbuilding the Dockyard and Raymarine leaving Cosham.
- Create an environment where entrepreneurs would want to set up or where start-ups may incubate. E.g. shared / communal workshops such as FabLabs and MakerSpaces.
- Use shipping containers, or other models similar to London 'pop ups', to support start-ups (e.g. businesses, retail, creative workshops space etc). They can be implemented quickly instead of putting regeneration on hold while major projects are due to be implemented.
- Small start-ups' survival rates are heavily impacted by rising business rates and energy costs.
- Focus regeneration on areas where deprivation is the highest.
- Have a co-ordinated plan that encompasses Gosport, Portchester and Portsdown Hill areas as well as Portsmouth.

The **PDPLA, Portsmouth Fabian Society** and others commented on the potential risks to economic stability from over concentration of certain commercial uses (e.g. coffee shops, estate agents and fast food outlets) and reliance on a few major employers and key industries. For instance, if particular sectors are adversely affected by recession, if demand at the Naval Base changes or there is a downturn in tourism.

Other Factors to Support Regeneration and the Local Economy

It was proposed that the Plan consider the 'basics'; what's needed in terms of wider infrastructure to support the economy, such as schools, health facilities (Local GPs and hospitals). A lack of key infrastructure provision in the south-east of Portsmouth was noted by some.

Other wider issues to consider that contribute to supporting Portsmouth's economy:

- Improve local transportation - utilise opportunities to travel by sea.
- Increase open space.
- Go beyond 'café culture'; include local shops and amenities.
- Support and invest in retail centres and retail parks; make them more appealing to shoppers.
- Protect and enhance the seafront - no more poor quality new buildings, protection of the Eastney nature reserve.

- Preserve and promote the city's historical and cultural integrity, including its maritime and military history. Opportunities at Fort Cumberland and the loss of historical buildings at Tipner were noted.

Other comments:

- The city generally lacks 'quality'. E.g. doesn't 'feel' like a university city despite the 24,000 students.
- Encourage new, low cost building techniques and materials to help meet the city's housing requirements.

Initial Council Response:

In many respects the comments are broadly in line with the current understanding of the issues facing the city. The proposed actions, including those on transport, skills, and regeneration of deprived areas are all to be investigated and developed further as part of this local plan process. The relative importance of marine related employment is noted.

What Local Economy options do you think the Council should follow in the new Local Plan? Are there any other options we should be considering?

Local Economy Options:

- **LE1.** Continue to protect land for employment use and seek redevelopment and renewal of the employment sites to provide additional floorspace or a higher quality accommodation.
- **LE2.** Focus significant new employment opportunities on:
 - Portsmouth City Centre for new office uses.
 - Tipner and Horsea island for marine related activities.
 - BAR Racing - The Camber, Port Solent Quay, Trafalgar Wharf and Portsmouth International Port as waterfront sites of sub regional significance to be protected for continued employment use, particularly for activities supporting the marine and maritime sector.
 - Lakeside North Harbour for office development.
 - The Naval Base may provide further employment provision over the Plan period but further discussion is needed with the Ministry of Defence to identify the scale and location of potential future opportunities.

Option LE1 received some support; it was considered to be the less prescriptive option. There was particular support for regenerating existing employment sites in the north of the city due to their proximity to the main access routes.

There was also some general support for focusing significant employment opportunities in the sites listed in Option LE2, specially the BAR Racing HQ at The Camber and Lakeside Business Park and the waterfront sites of sub regional significance (**Gosport Borough Council**) . Although it was suggested The Camber cannot expand its employment uses without improved public transport, potentially including water borne options.

While there is some support for the suggested approach to the Local Economy (**Gosport Borough Council** and others), other comments considered that Options LE1 and LE2 'miss the point' and do not meet the needs of the city. Strategic Options should instead consider where employment is needed. It was also noted that the two Options aren't mutually exclusive.

It was questioned by the Residents of Port Solent Association which part of the site is considered to be "Port Solent Quay"?

Some felt the options are too reliant on a limited number of sites or particular sectors.

The **University of Portsmouth** were disappointed with the extent of the recognition given to the University's contribution to the local economy in Options LE1 and LE2. They request a specific focus on the new employment opportunities that can be created by the University and through spin-off businesses and investment - such as the investment programmes set out in the University Quarter Masterplan. This would link to the Plan's objective to retain a greater proportion of graduates along with the net benefits that investment programmes would bring. They seek that their proposals are given policy status in the Local Plan through an option or allocation.

The Education & Skills Funding Agency noted that the Plan identifies issues regarding low educational attainment and social deprivation, but no particular policy Options to address them. They suggest the inclusion of Options for educational improvement in the Local Plan.

Alternative approaches to the Local Economy

Policy approach:

There was some general support for any policy option that would strengthen and regenerate the local economy rather than increase residential development.

Many comments mentioned the need to consider areas in the eastern part of the city for employment opportunities, including Eastney, Fraser Range, the St James' Hospital and Langstone site and the northern end of Eastern Road. **The Portsmouth & District Private Landlords Association** specifically comment that Copnor/ Milton/ Eastney either need better east-west access to workplaces on the western side of the island or more employment locally.

As **Barton Willmore** notes that there are no details of how opportunities will be increased to retain graduates in the Plan - they suggest the Council consider providing physical space within the city to enable businesses and the academic world to improve collaboration, joint ventures and specialist training, as well as providing attractive places for graduates to live and spend their leisure time. This strategy would make use of Portsmouth's existing assets while helping to develop the target industries set out by PCC, this in turn would help Portsmouth retain graduates, as employment opportunities improve. It is considered that retaining graduates is the key to improving Portsmouth's economy.

Alternatively, one comment questioned whether the protection of employment land should continue at all, or be allowed to naturally redevelop to other uses.

The impacts from traffic increases from the specific employment sites must be considered holistically with other development for the city as a whole.

Industrial employment should be towards the north of Portsmouth for proximity to key access and office based employment (design/ software development/ call centres etc) should be close to the retail areas to ensure that they have a ready customer base.

Specific Sectors/ Gaps in Provision:

The Council should look to develop/ include sites for manufacturing opportunities, environmental energy companies and expand other lesser economic sectors (i.e. technology based jobs) to 'futureproof' the economy and reduce reliance on exports due to the uncertainties of Brexit.

Portsmouth, as well as the south coast generally, lacks a sufficient conference centre. **Portsmouth & District Private Landlords Association** suggest a large, flexible seafront or harbour facing development offering a range of spaces, with associated hospitality and hotels.

Initial Council Response:

The responses were broadly in favour of promoting the local economy and employment, with suggestions of additional sites in areas such as Milton to reduce out-commuting. It will be important for the Plan to reflect the role the University plays in the local economy and this will need to be developed further in the coming months in response to the University Quarter Masterplan.

City Centre Regeneration

Many comments focused on the city centre as the 'priority' regeneration project for the city, citing its poor image, quality of offer and environment. It was suggested that regeneration should include:

- Cultural facilities/ space - a focus on art and cultural uses could help to avoid the 'homogenized image' of other town centres in the country and add vitality.
- A focus on the needs of residents.
- Higher quality/ high profile employment offer.
- High quality urban realm - reimagined approach rather than upgrades with 'makeovers'.
- Aiming to retain university graduates.
- A strategy to enhance the night-time economy (**Portsmouth Cultural Trust**).
- Quality dining options to match the offer at Gunwharf Quays.
- Actively encouraging 'quality' food businesses in order to lengthen 'dwell time' and answer the demand for evening dining (students and parents of students in the new developments).
- Diverse range of shops.
- Retention of key stores. Commercial Road needs a new big name 'anchor store' if M&S is soon to depart.
- Reviewing applications for uses of retail units on a case-by-case basis to allow for new food business or the social and cultural element to be included amongst the retail offer.
- Inclusion of the private rented sector.
- Tackling homelessness.
- A sub-committee for the centre.
- Invest in public transport and walking and cycling routes. Regeneration should not hinge on major road redevelopment; Creating places for vehicles do not make attractive public spaces for people.
- It was suggested that too much student accommodation could detract from encouraging quality retail development - the remaining respectable outlets in Commercial Road could further decline.

Recent development at Kings Cross was given as a good example of city living (residential) with a balance of leisure, tourism, retail and a creative industry cluster.

Regarding redevelopment specifically at the northern end of the city centre:

- **Landsec (Gunwharf Quays)** observe that the northern end of the city centre presents an opportunity to widen the land uses in the city centre, including new homes as part of the solution. They comment that any enabling road infrastructure for new city centre development should support growth and regeneration in other parts of the city, including Gunwharf Quays.
- Development on road mains must create an attractive introduction to the city - one comment suggested this should not be housing.
- Redevelopment of the former Tricorn centre area should include low-rise housing integrated with the city centre. It was suggested that more high-rise development would further detract from the attractiveness of the city centre area and lead to unmanageable traffic problems.

Conversely, others suggested that the city centre is a 'lost cause' that cannot compete with other centres and should be released to other uses. Issues and suggestions include the following:

- Mixed comments on the suitability of the city centre for office development; **Portsmouth & District Private Landlords Association** commented that the city centre cannot provide the ease of access, large footprint and on-site parking that companies now look for.
- The lack of any 'special outlook' for new housing (e.g. green space or water) to make them attractive places to live.
- The regeneration of the existing housing stock in the city should be given priority over city centre regeneration.
- Use the proximity to the train station, bus routes and ferry port to become a strategic housing area to meet social and affordable housing needs, together with some employment and tourism uses.
- It was challenged whether Portsmouth could support both Gunwharf Quays and Commercial Road given the average wages in the city. It was suggested that the more affluent areas north of Hilsea are instead served by the east-west corridor (e.g. Chichester).
- Parking is thought to be expensive for the quality of the shopping.
- Close and redevelop entirely, as a hub around the train station.

Initial Council Response:

The challenges facing the city centre are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The *Portsmouth Retail Study* set out evidence on the need for retail floor space across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road.

Other Employment Sites

Naval base

Gosport Borough Council supports any initiative for further employment provision at this site.

Other comments suggest investigating using underutilised land in the dockyard for employment uses and liaison with the MoD to encourage the freeing up or better utilisation of space.

Tipner

Make the redevelopment of Tipner attractive to families. Improve public transport and key infrastructure provision. Avoid or accommodate sites for wildlife.

St James' Hospital / Langstone Campus

Consider options other than housing such as commercial/ leisure/ tourism options.

Fraser Range

Fraser Range was put forward as a site for a business / professional services / finance / insurance business park and residential development. There one detailed suggestion regarding enabling access via a link road from the Eastern Road across the new Milton Common bund and then onto Ferry Point. Such a link would provide boating / marina / associated industries and residential opportunities in what is an underdeveloped and neglected area of the island, whilst also providing a viable alternative to the current inadequate 'Eastern Corridor' transport route for the 42,000 people who live in Baffins, Milton and Eastney.

There was one suggestion for a water based teaching facility at Fraser Range to encourage active lifestyles.

Cosham

Regeneration of Cosham High Street was encouraged. Outside of the high street chain stores there is a high turnover in the other units with prolonged vacancies.

Clarence Pier and surrounds

Consider attracting maritime industry and regenerating the area as part of flood defence work. More waterside bars and leisure facilities along the promenade.

Tesco in Crasswell Street in the city centre could be relocated to a site nearer the M275 with the site redeveloped for housing and parking

Initial Council Response:

The role these other areas can play in meeting the identified needs for employment land will be investigated.

Employment Requirements

35 comments received regarding this topic.

What amount of employment land do you think we should be seeking to deliver in this plan? What do you think is the correct approach to employment land?

Employment Requirements Options:

- **ET1a.** PUSH Spatial Strategy: Position Statement to 2034 - 120,000sqm of new employment floorspace; or
- **ET1b.** Selective release of employment sites for residential development - 100,000sqm of new employment floorspace overall.

The majority were in support of Option ET1a (15 comments) - this was mainly opted for as the higher quantity of employment floorspace. Comments also noted the Local Plan should look to identify and protect the maximum amount of employment land possible, with a focus on retaining existing sites. It was also considered that this is the more sustainable option to reduce commuting and car use by ensuring residents have more opportunities for local employment close to their homes. This contributes to making 'Portsmouth the premier place to live, be employed and visit'. The Plan should take a proactive approach to protect employment land because of the planned increases in residential development, and to help build a more sustainable economy.

Deloitte LLP - On behalf of Northwood Investors International Ltd (Lakeside Business Park) made some detailed comments on the approach to employment land requirements. They observe that the Plan uses the quantitative PUSH targets but doesn't recognise the other considerations noted in the Spatial Position Statement, including market signals and other quantitative and qualitative issues including the quality and suitability of existing employment sites and their ability to meet modern business needs. They contend that the approach proposed in ET1a fails to consider the qualitative and micro changes that continue to be experienced in the Portsmouth office market and at Lakeside. The Council's approach to employment floorspace should recognise the particular circumstances at Lakeside, and the lack of viability in undertaking pre-let or speculative construction, in determining the quantum of office floorspace to plan for – currently this has not been factored into the assessments. Without taking consideration of the viability in delivering 120,000 sqm of new build floorspace, this quantum of floorspace is thought to be too optimistic in the current economic market. They suggest an approach of monitoring local indicators, including rent levels; recent transactions; employer requirements and aspirations for economic floorspace; and close liaison with the business community; as recommended by National Planning Practice Guidance.

Northwood (Lakeside) consider that Option ET1b proposes a more realistic target, although alternative and complementary uses should form the balance. They note that there are plenty of industrial areas empty at present.

ET1b for the selective release of employment land received some further support (3 comments). It was suggested that available opportunities in the old airport area in Hilsea illustrates that there is opportunity for give-and-take in allocation of office /business/ housing permissions.

Alternative Employment Floorspace Options/ Approaches

- Lower proportion of employment land - at 25% or 30% [assume this is of the existing quantity].
- Take up high quality opportunities as they arise rather than allocating 'artificial targets' for employment land.
- Concentrate on existing areas of employment.

Initial Council Response:

There is a need to ensure that future housing growth is accompanied by economic growth and that the Solent Local Enterprise Partnership growth plans are supported by the new Local Plan. The PUSH Position Statement was published in June 2016 and as such presents a recent assessment of the sub-regional employment position. However, the potential for some limited release or relaxation of employment areas to meet other needs or respond to market signals will continue to be kept under review. There is a need to consider the strategy for employment land provision taking account of both the amount of floor space required and more qualitative issues, such as the quality and suitability of existing employment sites and their ability to meet modern business needs.

4. Retail and City Centre

103 comments received regarding this topic.

Do you agree with the description of issues regarding retail and the city centre? What other issues are there to consider?

Many of the comments received agreed with and expanded upon the issues identified in the chapter, particularly regarding the city centre, as follows:

- The lack of night time economy after shops close and lack of any leisure uses.
- The poor public realm of Commercial Road - homelessness, drug taking and associated issues creating a fearful environment. It suffers from poor design, dilapidated buildings and piecemeal development.
- The centre is losing trade and stores to other centres (Fareham, Southampton, Hedge End and Whitley were mentioned).
- Many agree with the need to improve the city centre's retail, leisure and entertainment offer.

Other issues for the Plan to consider:

- Suitable locations within the centres to accommodate identified needs for retail and other main town centre uses.
- The need to aim for higher quality in the centres, particularly the city centre.
- Centres need to have a unique appeal for visitors and offer a reason to visit and linger.
- Investment in the public realm; in order to increase local and out of town visitors.
- The harm of long term vacant retail units.
- How to attract retailers and a mix of retail that includes more independent stores, not purely national chains. Encourage local themes (e.g. seaside based).
- How to incentivise quality new uses (retail/ restaurants/ bars) without low end options (example of too many charity shops given).
- High rents in centres. One suggestion is to divide up large empty units and offer reduced business rates.
- How to encourage sustainable connections to centres: cycling would require safe, attractive routes and adequate bike parking space if goods are to be transported by bike (e.g. the Dutch use cargo bikes and trailers).
- Improving access to centres and the infrastructure within them.
- The expense and provision of parking. Centres need adequate parking if they are to compete with out-of-town sites. The expense could also affect the vitality of centres: *"No-one will stop for a cup of tea when it cost more to park for 30 mins than the drink!!"*
- Consider the impacts of city centre regeneration on the other Portsmouth centres.

It was suggested that the Local Plan should look at other examples for inspiration such as the revamped Army and Navy store in Chichester or the 'Mercado Centrale' in Florence. The existing style of Guildhall Walk could be built upon and the high quality environment of Gunwharf Quays or West Quay in Southampton could be used as a model for future developments. The Plan should also look at how other cities have tackled the problem of inner city decline.

What options do you think the Council should follow in the new Local Plan for retail and the city centre? Are there any other options we should be considering?

Retail Options:

- **R1.** Maintain the structure and/ or centres in the existing retail hierarchy.
- **R2a.** Relax existing policy on city, town, district centres to provide greater diversity in secondary frontages including residential, employment, cultural and leisure activities and review centre boundaries; or
- **R2b.** Keep current boundaries for city, town, district and local centres and retain existing primary and secondary retail frontages.

Retail Centre Hierarchy (Option R1)

Landsec (Owner and management of **Gunwharf Quays**) is very supportive of the continuation of current retail centre hierarchy for the city which includes Gunwharf Quays as part of the formal city centre.

Alternatively, there was a recommendation to reconsider the whole structure of retail hierarchy based on turnover rates.

Retail Centre Policies Options (Options R2a and R2b)

While there was some support for the current approach of retaining centres for mostly retail (A1) uses (Option R2b), many comments wanted to see a greater diversity in the mix of uses and a change from the traditional approach to retail planning, to include a review of the existing centre frontages and boundaries (Option R2a). The latter allows for the 'possibility of change or improvement' in centres and the potential of an improved evening economy through increased cultural, social, dining and leisure uses - to create more of an 'experience', particularly higher quality dining. However, it was also noted by the **Portsmouth's Tackling Poverty Strategy Steering Group** that Option R2a could risk making local centres unsustainable by potentially allowing alternative uses that may not meet the needs of the local community.

Further comments on the existing policy approach/ maintain option (Option R2b) considered that it does not recognise the existing and inevitable decline in the high street retail sector and competition from online shopping. The traditional view of retail usage doesn't respond to the changing nature of the industry. Allowing some flexibility would allow for change, such as fluctuation in student numbers affecting trade in the centres for example.

Portsmouth's Tackling Poverty Strategy Steering Group consider that it isn't clear enough how any of the Options would differ in delivery or impact.

Alternative Options/ Approaches to Retail Centres:

Retain evening uses, including stronger policies to safeguard pubs from changes of use.

Portsmouth's Tackling Poverty Strategy Steering Group: Centres should maintain a diversity and balance of businesses that meet residents' needs and support wellbeing. Otherwise centres in more deprived areas can attract businesses that compromise residents' health and wellbeing, such as those offering high cost credit (rent to buy stores, payday loans etc), gambling, and low quality,

unhealthy fast foods. Such uses could be exacerbating the inter-generational cycle of poverty, especially amongst communities who are less able to travel to other retail centres.

Initial Council Response:

The Portsmouth Retail Study set out evidence on the need for retail floor space across the city but this work need developing further to provide further detail on opportunities and a way forward for the town, district and local centres. It is proposed that retail and other issues for these centres are addressed in a background paper to enable proper consideration as part of the Plan process.

Portsmouth City Centre (Regional Centre)

There was a divide in the comments on the overall approach to the city centre; some consider the area as the priority for investment, to be revived to a high quality high street to serve the city, as the offer at Gunwharf Quays is not a substitute. Others feel the city centre has 'failed' as a retail destination and should be allowed to 'die' and naturally turn over into other uses. There was also the suggestion that the economic profile of the area would not support a prosperous high street.

Suggested Uses:

- There were many comments on the need for a greater mix of uses - particularly quality food and drink.
- A unique draw for the centre and different offers.
- An open air / continental/ food market for Commercial Road - it would provide variety and quality for the centre.
- Leisure, culture and 'experiences'.
- 'Anchor' stores to pull in visitors (e.g. M&S and John Lewis).
- Provision for a night time economy - cultural/ leisure (e.g. cinema) and dining.
- Increased residential uses
- Day and night uses of centres such as Cascades.

For suggested uses of the northern end of the city centre/ former Tricorn site, see section 17.

Centre Boundary:

Some dispute over whether the city centre area should include Gunwharf Quays, given they are physically separate areas with very different offers. Others wanted to see more linkages between the two if they are to be defined as one centre.

One response gave a detailed walking route suggestion: a walking route via the south-side of Park Road would be greatly enhanced if 1- 2 metres of land could be purchased from the MOD playing fields. This would enable planting and seating in some places and would help to improve public health as both sports players and pedestrians would be further away from vehicles and NO2 emissions from idling engines. Once across the new and improved Anglesea Road crossing, the route could continue through Victoria Park to either Cascades or Commercial Road.

Policy Approach:

- The opportunity should be taken to consider what kinds of activities would attract visitors, rather than preserving the centre in its current form.
- Actively market as a destination to attract quality retailers.
- Maintain Gunwharf Quays in its current form.

- Reorganise Commercial Road, it is currently 'split' by Cascades;
- Make more of Victoria Park as an asset; visibly open up and link to the city centre.
- Any shops leaving Gunwharf should be encouraged to take empty units in Cascades.
- Prevent any single use business district forming. Increasing the housing for graduates/ young professionals in the CBD, together with food and drink options, would reduce congestion and support the wider retail, service and night time economy
- Requires an integrated public transport system; suggestion of electric buses and vehicles and linkages to the underused rail system at Cosham and Hilsea.

The **University of Portsmouth** suggest the University Quarter within the city centre boundary is identified as an Opportunity Area given the specific development and infrastructure opportunities and the possibilities to enhance the city centre's diversity and attractions. It would be linked to promotion of tourism and culture given the contribution that the University makes to the local economy.

Initial Council Response:

The challenges facing the city centre, and the Commercial Road area in particular, are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The *Portsmouth Retail Study* set out evidence on the need for retail floorspace across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road.

Southsea Town Centre

Comments received:

- Make a focus for retailing and maintain existing retail area including the department stores.
- Consider whether the centre can continue to support two large department stores.
- Needs to offer a mix of uses and amenities to avoid becoming a café and restaurant area only.
- Encourage quality high street chains and small independents, the latter offer a reason to visit.
- Needs more dedicated car parking.
- Promote Castle Road for alternative, independent shopping.

District Centres

Policy Approach:

Enhance District Centres through urban realm improvements and access to sustainable transport routes. Local 'hub' feel may need to be enhanced in some centres by rationalising long, linear centres. Ground floor uses in the 'hub' area should exclude residential but allow restaurants and cafes which could extend the 'life' of centres.

North End and Fratton District Centres

- The Centres are in a poor state and should be a priority for regeneration.

- It was suggested that Fratton doesn't need to be a retail centre due to the proximity of Commercial Road.

Cosham District Centre

- Redevelop Cosham High Street to better support the surrounding demographic who are currently choosing to shop elsewhere.
- Encourage high quality, independent shops and cafes.
- Extend centre to the side roads off the High Street including the library which is an underused resource.
- The Spur Road could become a higher quality alternative to the high street.

Albert Road and Elm Grove District Centre

- Considered successful for its unique shops and character, which should be retained.
- Prevent high rents to help the survival of independent shops and restaurants.
- Resist chain stores in this centre.

Local Centres

More consideration should be given to the local retail centres; new development should be required to take into account connectivity by walking, cycling and public transport.

Suggestions for new Local Centres

- 'Milton Market' parade is valued by the local community and is said to play a pivotal role in serving the local Milton Community; the local services here such as the post office should be protected. The few shops on Locksway Road aren't considered to constitute a local centre.
- Fitzherbert Road in Farlington and other strong retail areas in the Hilsea area.
- Tipner should be priority area for a new centre
- A new retail district comprising Lakeside, Port Solent and Horsea Island.

Initial Council Response:

The *Portsmouth Retail Study* set out evidence on the need for retail floorspace across the city but this work needs developing further to provide additional detail on opportunities and a way forward for the town, district and local centres. It is proposed that retail and other issues for these centres are addressed in a background paper to enable proper consideration as part of the Plan process.

Retail Requirements

44 comments received regarding this topic.

Do you have any views on the needs we have identified for new retail floorspace? Do you agree that Portsmouth City Centre is the correct location for new retail floorspace?

Retail Requirements Option:

- **RT1.** Locate retail comparison floorspace requirement in Portsmouth City Centre

There was some support for Option RT1 (17 comments). In particular it was noted that:

- New retail floorspace would be beneficial to the city centre and would assist with the regeneration of Commercial Road.
- It remains the most sustainable location given the available space and travel restrictions in Portsmouth, even though the sector is diminishing.

Landsec (Gunwharf Quays) is supportive of the 'town centre first' approach to retail and the inclusion of retail development within the strategic options for growth given its importance to the city centre and the performance of the city as a whole.

Others (8 comments), including the **Railways Pension Fund**, support the principle of locating new floorspace to the city centre, but consider that retail uses in isolation would not be successful/ viable and other strategies (e.g. incentives to quality retailers) and uses (cultural, residential, employment and leisure) would be needed to promote the centre, with support for a sustainable transport system. **Northwood Investors (Lakeside)** add that there should be a mix of uses on key employment sites (inc. retail and leisure) to minimise journey times and contribute to their sustainability.

However, others were against allocating further retail floorspace to the city centre, or any new retail floorspace in Portsmouth (13 comments). It is thought to be 'unrealistic' due to the existing lack of demand and major investors for the city centre as well as the decline of retail and high street trade nationally. It was also said that creating more retail space for lower skilled employment while office space is lost to housing doesn't make economic sense.

Alternative locations for new retail floorspace:

- New floorspace alongside investment in smaller centres.
- An extension of Gunwharf Quays
- Tipner - to reduce traffic congestion into the city.
- Lakeside and Port Solent - to compliment the other outlets along the A27. **Northwood Investors (Lakeside)** would like to see Lakeside's large business population supported by an appropriate level of retail floorspace.

Suggested Alternative Approaches to Retail Floorspace:

- Focus on attracting retailers and visitors to the existing centres to fill existing floorspace.

- Focus on the most successful retail area in the city and develop that to its maximum capacity, one centre at a time.
- Consolidation of existing retail space in Southsea.

Evidence Base Comments:

One response was of the view that the background evidence on retail (Retail Study 2015 - based on 2014 survey data) for the plan is already out of date; descriptions of the centres were no longer considered to be accurate. They request the study is updated with new data with the recommendations fed into the next draft of this report.

Landsec (Gunwharf Quays) also consider the study to be out of date; retail and town centres evidence base needs to be kept up-to-date to take into account retail commitments, the latest economic forecasts, up-to-date information on shopping and leisure patterns and the usage of 'town centres' and the health of defined 'town centres'. Landsec is happy to work with the Council to keep the evidence base up to date. In addition:

- The study lacks qualitative considerations in relation to comparison goods floorspace and commercial review of the potential for different parts of the city centre to accommodate retail development.
- The identified quantity of new floorspace required (for 77,000m sq of additional comparison retail floorspace) is a quantitative need forecast and is based upon the city increasing its market share in comparison goods shopping from 26% to 30% over the Local Plan period. The supporting text in the Plan should make the basis for the capacity forecasts clear.
- The Plan should provide phased capacity forecasts (i.e. up to 2021, 2021-2026, 2026-2031).
- They support the conclusion that there is no quantitative need for additional convenience goods floorspace with the recognition that additional provision may be required on a qualitative and/or locational basis.
- They request the Plan should provide deliverable allocations to accommodate the identified need for retail floorspace and other main town centre uses - to include Gunwharf Quays as part of the city centre.

Initial Council Response:

The challenges facing the city centre are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The Portsmouth Retail Study set out evidence on the need for retail floorspace across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road. Comments on the age of the evidence and potential for renew and refresh are noted – a retail background paper will be prepared which will revisit these issues and may determine that a more comprehensive reassessment of retail needs is required. The role limited retail provision can play in placemaking and ensuring areas remain attractive to employers is acknowledged.

5. Tourism and Culture

83 comments received regarding this topic.

Do you agree with the description of tourism and cultural issues? What other issues are there to consider?

There was some general agreement with the issues identified, with the following additional issues/suggestions to consider:

Culture/ heritage

Historic England would like to see greater recognition and co-ordination of all the naval based heritage in Portsmouth, and **Gosport Borough Council** request that this is extended to corresponding attractions on the Gosport side of the harbour.

Greater protection and recognition of the importance of historic cityscape and visual amenity of Portsmouth & Southsea - this is currently considered to be insufficient.

Recognition of history in the north of Portsmouth, potential exists if it could be invested in.

Portsmouth Cultural Trust (Managers of the Guildhall) would like to see cultural development play a key role in developing a unique identity for the city that will draw visitors day and night. 'Successful urban regeneration is often achieved when balancing the needs of retail, tourism, accommodation and cultural provision'.

Portsmouth's theatres and other performance venues should be recognised in this chapter (this would also reflect the wording of Objective 4). Concerts and shows are key to creating a vibrant night-time economy, encouraging more overnight stays thus encouraging further hotel development.

Consider the accessibility to the city's cultural offer for residents in areas of deprivation; aim to increase uptake through free and low cost opportunities.

Tourism Attractions

Portsmouth's 'unrivalled' tourism potential should be fully exploited, with a greater emphasis on attracting more visitors.

Include reference to the Spinnaker Tower and the Guildhall in the Plan due to the high visitor numbers.

Recognise and build on the tourism potential from the large number of visitors for football games. For example: development of the links between Arthur Conan Doyle and the original Fratton Football Club.

Investment in the city centre

Landsec (Gunwharf Quays) support the inclusion of Gunwharf Quays as a tourist attraction amongst the more traditional destinations. It recognises that tourists now have a diverse set of reasons for visiting a particular town or city and provides an opportunity for a longer length of stay in

the city through investment and diversification of the existing offer into a resort concept with hotel, leisure and additional retail offer.

Seafront

There was some different opinion on the provisions for seafront amenities. Some would like to see greater provisions provided (e.g. more cafes, toilets) but others felt the seafront has sufficient development/ attractions and that the seafront is an attraction in itself. There were also comments on the need for higher quality of design and development in this location, referencing some of the current retail outlets and chain hotels. The appearance of seafront cafés such as the Coffee Cup and Southsea Beach Café are popular with some but not with all.

- One response requested more retail near the Hotwalls in Old Portsmouth in a similar style to the studios.
- Consider the potential impact of sea defence proposals (potentially in the form of a new sea wall) on the appeal of seafront, while also looking to the works as an opportunity to improve the seafront area.
- Plan for more ambitious investment and development in seafront/ harbour front and city centre sites.

Further comments on the seafront were received under the proposed Seafront Opportunity Area in section 22 of this document.

Visitor Economy and Infrastructure

Comments were received emphasising the economic benefits of tourism including the potential for a greater night-time economy. **Portsmouth Cultural Trust** consider that tourism and culture present significant economic benefit to Portsmouth; there are primary and secondary benefits to enhancing tourism and culture which impacts on local retail, dining, local employment, health and wellbeing.

Landsec (Gunwharf) acknowledge the role that a revitalised city centre can play in attracting tourists and visitors to Portsmouth and the important economic driver that overnight visitors have on the local economy. The Local Plan also needs to recognise the role improved connectivity of the identified key attractors will have on dwell time and spend per head of the visitors.

The need for more hotels was supported by most respondents , essential for maximum benefits from tourist spend, although one queried the source of evidence for the shortage. However, it is noted that there is no comprehensive strategy for how identified deficits (hotels/ conference and event facilities) will be addressed. New hotel development should be of higher quality design than those recently constructed - it was said that Portsmouth doesn't have any top rated hotels.

Others would like to see the Plan do more to look at job creation opportunities within tourism and culture. However, provision for tourism should be balanced against benefits of other economic sectors, such as development of a hi-tech sector associated with the University for example.

Transport

Many of the comments on tourism and culture focused on transport issues; either focusing on the limitation of existing networks or suggestions for improved access and connectivity for visitors:

- Tourism overall, and particularly access to the seafront, is affected by limited car accessibility and congestion.
- There isn't enough on-street parking or car parking space to accommodate tourists.

- The need for a sustainable transport network to link up all attractions. E.g. For a family visiting the seafront or dockyard by car, walking long distances or waiting and paying for buses may discourage them from exploring the city further. This network would also reduce congestion and increase visitor 'dwell time' and spend per head of visitors.
- Focus on the city's main attractions (Gunwharf Quays and the Historic Dockyard) for sustainable transport links and parking improvements to encourage connecting trips to the city centre and seafront.
- Public transport to the International Port is very poor and not a pleasant environment for visitors.
- Extend the Park and Ride service to Southsea shops and seafront.
- Utilise Portsmouth's potential for water modes of transport. Look at Gosport's water services as an example and consider connections.
- Create more links with the existing travel hubs in Europe via the International Port.
- Reinstate the Hayling Island Ferry bus service and/ or improve cycle links; this would connect to the visitors in the Hayling Island holiday camps.
- Vintage bus or hop on/ hop off bus tours of the city, connecting with The Hard travel interchange.
- A 'little train' service at seafront.
- Improved transport links from the railway stations to the seafront.
- Update/ upgrade the train stations.
- A safe network of cycle routes around the city, linked to longer distance routes from outside the city. Even a practical and affordable bike hire scheme would not succeed without making key junctions and roads safer.
- Clearer signposting between sites to encourage people to walk between Old Portsmouth, Gunwharf Quays, City Centre and Southsea - map boards often get be vandalised.

Do you agree with the proposed preferred option for tourism and culture for the new Local Plan? Are there any other options we should be considering?

Tourism Options:

- **T1.** Retain current approach to enhance the tourist and cultural sector.

The overall view was that the single option presented didn't go far enough. The Option is too vague; the current approach is not explained and the supporting section doesn't offer any further sufficient clarity on what the preferred option actually comprises.

More should be done to promote tourism and culture in Portsmouth. A greater vision for the future of Portsmouth should be sought; 'no greater opportunity exists anywhere else in the UK'. To achieve the Plan's Objectives this section requires re-examination with further research and detail.

Suggested Local Plan Options for Tourism, Leisure or Cultural Uses

A number of specific locations or sites were put forward to be considered as Options for the Local Plan to allocate for tourism, leisure or cultural uses.

New Cultural Quarter: Portsmouth Cultural Trust (managers of the Guildhall) encourage the Council to continue to advance the development of an identifiable cultural quarter which takes in the Guildhall, Guildhall Square and Guildhall Walk, in line with the vision set out in the 2013 City Centre

Masterplan for a civic and cultural centre focused around the Guildhall area. A prerequisite for a cultural quarter is the presence of cultural activity, cultural production (making goods, products and providing services) and cultural consumption (visiting shows, galleries, libraries). Therefore, provision of venues is most critical to a cultural quarter within the area defined; currently, as well as the Guildhall, there is the New Theatre Royal, Central Library, local nightclubs and Guildhall Square.

Hotel allocations: The city centre (including Gunwharf Quays) also has the potential for hotel sites given the identified undersupply.

Key Sites:

A site for the new **Sherlock Holmes Museum** given its international appeal. Such as the former Southsea Police Station or St James Hospital, rather than losing land on Southsea Common.

Dockyard and Gunwharf should be the priority development areas as the city's main tourist attractions; improving transport links and parking here could link/ encourage visitors to the city centre and seafront.

Gosport Borough Council suggests that **Portsmouth Harbour** is identified as an attraction in its own right (boat trips, views etc.) They request that the Plan works on a cross harbour basis to identify the linked Historic Dockyard attractions on the Gosport side of the harbour, as the adopted Gosport Borough Plan does for the Portsmouth sites.

Develop the land around **Portsmouth Football Club**: make it more attractive, special lighting to match the football colours, better public realm linking Fratton Station to the city centre (Commercial Road). Widen the route from Fratton Bridge along Goldsmith Avenue.

Retain **Eastney Caravan Park** as a tourist destination (and resist any plans to build at Eastney point). Support the previous Seafront Master Plan approach of enhancing the visitor experience by extending the seafront and utilising the heritage asset of **Fort Cumberland** (responses suggest as a museum and a tourist attraction).

Identified use for the derelict **Brunel House overlooking The Hard** - should be a priority.

Alternatively, seek tourism opportunities across the whole city, not just the city centre and Southsea.

Draft Cultural Policy: The Theatres Trust has suggested the following wording for a draft policy to encourage cultural activity:

"Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. Major developments are required to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture. The loss or change of use of existing cultural and community facilities will be resisted unless:

- replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or*
- it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.*

The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations and the public realm."

The Theatres Trust also request that the Local Plan should contain a definition of 'cultural and community facilities'. The following is suggested: "*cultural and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.*"

Other comments on Tourism, Leisure or Cultural Uses

Disappointed that the Marines Museum has left Eastney; it was a valued event space for concerts, balls etc.

Initial Council Response:

The importance of tourism, leisure and culture was recognised in the Issues and Options document but perhaps the description of the issues and options did not go far enough. Portsmouth has a wealth of cultural, tourism and leisure assets which deserve recognition. The key for the Local Plan is to set out a suitable city-wide strategy for this sector and to identify those specific assets which, by reason of their nature, scale or location, are a key consideration for the future planning of their area. This will be considered further in terms of linking with existing Council strategy, engagement with key organisations, and consideration of strategic sites, broad areas and other site-specific proposals.

Many of the comments concerned the role of transport when considering Tourism, Leisure and Cultural issues. These are useful considerations given the city's role as a significant tourism and cultural centre, and future transport work for the Local Plan will need to consider how to serve venues and events. For instance, a previous attempt to serve Southsea Town Centre with park and ride was not financially sustainable. Solutions need to be found for the long term.

6. Health, Well-being and Open Space

100 comments received regarding this topic.

Do you agree with the description of issues regarding health, well-being and open space? What other issues are there to consider?

The majority of respondents, including the **Paulsgrove Residents Association** and **Landsec (Gunwharf Quays)**, showed agreement with part or all of the description of issues set out.

Responses were generally supportive of the descriptions of options set out in paragraphs 4.47 to 4.57 of the Issues and Options paper, but some suggestions for further work were made:

- More information needed on the adequacy, or not, of open spaces and sports facilities for current and future population levels.
- A better understanding of links between health, wellbeing and open space and population density and deprivation is required.
- More evidence is required on the economic benefits of a healthy population.
- More evidence is required to understand issues of social isolation.

Factors impacting Health and Well-being

Respondents including the **Milton Neighbourhood Forum**, **Sustrans**, **Public Health and Portsmouth' Tackling Poverty Strategy Steering Group** noted that the following factors have an impact on health and well-being in the city:

- Poor air quality
- Poor provision of good quality, safe and attractive walking and cycling routes
- The large number of fast food outlets
- Poor provision of green space in densely populated areas
- Lack of acknowledgement between health and education

The **Portsmouth City Council Public Health** team state that consideration should be given to restricting licences for fast food outlets in some areas, such as near schools, as a way of combating childhood obesity. The NICE public health guidance, 'Prevention of Cardiovascular Disease' recommends encouraging planning authorities "to restrict planning permission for takeaways and other food retail outlets in specific areas (for example, within walking distance of schools).

Suggestions were also made as to how the Plan could seek to address these contributing factors:

- Provision of green space on and around buildings i.e. on roofs and green walls.
- Increase tree planting as part of reallocation of road space.
- Protect green space and maximise opportunities to provide new green space
- Increase access and uptake of use of greenspace by those living in areas of deprivation and health inequality.
- Provision of better urban infrastructure to provide free opportunities for physical activity.
- Use Health Impact Assessments within the planning process to help to identify changes that can be made alongside new development to enhance the urban infrastructure.
- Provision of large school playgrounds located away from roads.

- Including the importance of health, well-being and active lifestyles in the school curriculum.

Access to Health Facilities

Responses discussed the current issues accessing healthcare facilities such as GP services. Suggestions were made as to how this could be addressed in the Plan:

- Include GP practices in areas of new housing development.
- Include provision for healthcare facilities to meet the needs of the aging population and those with disabilities.
- Consider how the Council can work more closely with QA hospital to reduce bed-blocking and provide alternative facilities.
- Provision of healthcare facilities to meet a range of needs e.g. the elderly and disabled.

Some respondents also raised concerns that the former St James' Hospital site is no longer allocated for health uses and suggested that the site should remain in health uses to relieve pressures. It was stated that the housing allocation would not meet the objectives to improve health, wellbeing and open space.

Active Travel

Responses from **Gosport Borough Council, Hampshire County Council, Portsmouth Cycle Forum** and **PCC Public Health** and others stressed the importance of the role of active travel in supporting health and wellbeing. It was suggested that:

- The Plan makes reference to the route of the England Coastal Path and National Cycle Network.
- Attractive walking and cycling routes are important. It is acknowledged that it is hard to establish new open space, but it is possible to create attractive routes to it.
- There should be an increase in clearly signed walking and cycling routes, located away from roads to enable people to get to open space and sports facilities.
- There should be a focus on making the city a pleasant place to walk and cycle around. This is particularly important in deprived areas.
- Improving pedestrian and cycling links to the area surrounding the city can aid PCCs approach to improving health and wellbeing by providing high quality recreational opportunities for residents.
- More should be done to discourage car journeys.
- Funding dedicated to traffic improvements could be used to improve cycle infrastructure.

Open Space

Comments indicated a desire to protect open space in public use due to its importance for health, wellbeing and social value. In particular, areas that were seen as important to protect were:

- Green space at St James' Hospital
- Victoria Park
- International coastal designations and wildlife habitats
- The seafront and public access to the shoreline

Some suggested that stronger policies are needed in the new Plan to ensure protection of open space in the face of pressure on space for housing and infrastructure.

A number of respondents, including **Friends of Old Portsmouth Association**, suggested that equality of access to open space is just as important as provision of it. There is a need to eliminate barriers to use.

One respondent suggested that cemeteries and church yards should be included in the public open space description.

Some respondents also requested that more information is made available about the progress with Horsea Country Park and about how the site will be accessed by walking and cycling routes.

Two responded stated that Portsmouth has a low number of quality parks compared to other cities. It was noted that it is important to protect what we have and ensure there is provision of good quality facilities.

Nature Conservation and Wildlife

Respondents including the RSPB, Natural England and Hampshire and Isle of Wight Wildlife Trust acknowledge that green infrastructure needs to be multi-functional but it should also look to protect and enhance areas for wildlife. Some concern was raised regarding the potential impact of development on wildlife habitats:

- It is likely that wildlife habitats will become more fragmented and possibly damaged. Any recreation or health and wellbeing strategies should be informed by robust and up-to-date ecological information.
- Areas of high nature conservation value need to be managed to ensure they remain in favourable condition.
- A recreation management strategy is needed to identify areas of GI that are more resilient and able to withstand recreational pressure.
- Appropriate resources should be made available to manage all areas of green infrastructure, whether for nature conservation or public recreation, equally.
- Consideration needs to be given to sites of importance for designated birds other than Brent geese.
- The Council should consider the value of open space to provide recreational space that is an alternative to the SPA.
- It is important to ensure that there are good links to less sensitive open space to direct recreational pressure away from more sensitive areas.
- Important to include measures for biodiversity enhancements and consider whether existing management measures address the nature conservation interests of existing open space.
- Measures to protect and enhance biodiversity should be incorporated into the Local Plan policies.
- Major development should include provision of GI and open space.
- Local greenspaces in higher density areas should be enhanced.

Sports Facilities

Sport England has identified issues regarding security of tenure and accessibility to naval/MOD sports facilities for clubs.

The **University of Portsmouth** raised the following points regarding sports facilities:

- The University makes an important contribution to health and wellbeing in the city through use of its sports grounds for local community groups as well as promotion of sport to staff and students. These benefits will be enhanced by the University Quarter Masterplan.
- Recommend the indoor sports study, playing pitch and open space strategies are completed and published at the earliest opportunity in order to inform decision-making and robust policies. This is of particular relevance to the Langstone Campus site.

Landsec (Gunwharf Quays) acknowledge there will be a need to ensure that a good standard of provision is maintained, and suggests the possibility of relocating existing sports pitches away from the city centre where suitable alternative provision can be made and where redevelopment contributes to the wider objectives of the Local Plan strategy.

**What options do you think the Council should follow in the new local Plan?
Are there any other options we should be considering?**

Health and Wellbeing Option:

- **HW1.** Seek to enhance health and well-being through new development in Portsmouth.

Most respondents agreed with Option HW1, stating that it is essential to making Portsmouth a better place to live. However, it was suggested that this was too vague and could be improved as follows:

- Including a provision to ensure that all new residential development must include children's play space.
- Include policy for low-car and car-free development.
- There should be a special focus of this policy on those living in areas of deprivation.
- Include provision of street lighting in parks to encourage use.
- There should be key priorities regarding walking and cycling infrastructure.

Open Space, Sports and Playing Pitches Options:

- **OA1a.** Retain current approach in the Local Plan to retain green infrastructure, including the Fratton Park/southern Rodney Road for use as a football stadium; or
- **OS1b.** Seek to extend the green infrastructure network.
- **OS2.** Provide additional capacity for built sports facilities in the city.

A number of comments supported Option OA1a, in particular the retention of the football stadium at Fratton Park. It was suggested that existing policy PCS7 should be retained.

Some respondents described Fratton Park as having an entertainment function rather than sport.

There was more support for Option OS1b, including from the **University of Portsmouth**, with a number of suggestions for improvements made:

- There should be a plan for safe and comprehensive walking and cycling networks across the city, connecting all areas to open space and other amenities.
- Protection should be put in place to prevent what little open space we have, including the seafront and beach, being lost to development and there should be enforcement of standards of provision.
- Need to improve what we already have as well as extending the GI network.
- Should include 'pocket parks' in new developments.
- Suggest inclusion of community gardens.
- Suggest a role for community wardens to manage green space.

A number of respondents, including the **University of Portsmouth**, discussed capacity for built sports facilities in the city and supported Option OS2.

- Respondents agreed it is important to keep sports facilities and playing pitches in public use.
- Noted that inclusive access is important for access to sports facilities, as is cost, which can be restrictive.
- There should be more opportunities for residents to use the University sports facilities as a way of improving health and wellbeing.
- More should be done to promote and encourage access to sports facilities that we already have.

Sport England note that any of the options selected should be informed by the on-going work to develop a Playing Pitch Strategy and built facilities strategy.

Other Options to be considered

Education and Skills Funding Agency highlight the importance of education (including the associated provision of sports pitches) should be reflected in the options, to include:

- Clear indication of the Council's intention to provide high quality school places, either through new schools or the expansion of existing schools, to meet the need and demand generated by development and to tackle the identified issues of low educational attainment and social deprivation.
- Reference to key national policies relating to new school places.
- The principle of safeguarding land for the provision of new schools to meet government planning policy objectives, as well as safeguarding land for future expansion.
- Acknowledgement of Government's commitment to support the development of state-funded schools and their delivery through the planning system.
- Close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.

Other comments on Health, Well-being and Open Space

A number of comments were received regarding issues of health, well-being and open space in specific areas of the city and made suggestions for provision of specific facilities:

- Seafront flood defence works provide an opportunity to provide better walking and cycling links.
- Suggest the use of Paulsgrove tip for mountain biking.
- There is a lot of excess open space in Eastney and Milton that could be used for housing.
- Land available at St James' and Langstone Campus should be gifted to the people as public open space.
- Land at St James' should have the fences removed so it can be used for sporting events
- Provide a connected green corridor between Milton Common and Eastney.
- Access to open space for those living in the city centre is essential and needs to be improved.
- The Plan should support the Milton Heritage Trail.
- Improve sports and leisure opportunities along the seafront.
- Concern at potential housing development in the Seafront Opportunity Area.
- One respondent suggested provision of a water park.

Historic England notes the Council could recognise that Victoria Park, Southsea Common and Kingston Cemetery are all grade II registered historic parks and gardens as well as components of the city's green infrastructure.

Initial Council Response:

There are a large amount of interrelated issues to be considered for health, wellbeing and open space. To inform the next stages of the Plan, technical work will be prepared to address key identified issues. That includes: an air quality study to consider current and future air quality issues and the potential impacts of predicted growth; an open space study to consider the quality and quantity of open space across the city and in specific neighbourhoods; an assessment of future healthcare needs and infrastructure requirements in the Infrastructure Delivery Plan; an assessment of options for active modes of transport to promote walking and cycling; a paper on the role and opportunities for Green Infrastructure, including for nature conservation and a role in enhancing biodiversity; a playing pitch assessment to identify provision and requirements; and measures in response to emerging evidence on Brent Geese and Solent waders.

7. Heritage, Design and the Built Environment

72 comments received regarding this topic.

Do you agree with the description of issues regarding heritage, design and the built environment? What other issues are there to consider?

Heritage Issues and Options

Heritage Option:

- **H1.** No change to the approach to conserve and where possible enhance the city's heritage assets.

Nine respondents agreed with the issues regarding heritage, design and the built environment and had no further comment to make. A range of other positive comments, suggestions, and general points were made by respondents including:

- Noting that heritage is a key component of the city's brand.
- Future development should not be harmful to the historic environment.
- Suggesting that the plan should give more weight to heritage and conservation.
- Noting that the city has a poor record of preservation, a trend which should be halted and reversed.
- Expressing concern at the lack of enforcement and a rise in retrospective applications.
- Noting a perception that conservation requirements can be flouted.
- Highlighting the importance of the definition of heritage in resisting harmful new development.
- Flagging that the surroundings and context of assets need enhanced protection.
- Noting that a more rigorous approach is required to conserve and enhance the city's heritage assets.
- It was suggested that the role of public houses has been overlooked, and they should be protected.
- Cultural heritage requires greater investment.
- There should be more support for interpretation panels and heritage walks.
- The city should have more focus on its naval history.
- Old and empty buildings should be re-used.

Site/area specific comments regarding the need to improve particular areas were made regarding Fort Cumberland and nearby SINC.

The land in these areas should be enhanced:

- Hilsea Lines
- Guildhall and Guildhall Square:
 - Should be improved (in line with the Cultural Trust's Renaissance Plan), in order to deliver greater public benefits/ meet wider social and economic objectives.
 - The north side of Guildhall Square presents a redevelopment opportunity for the city. The construction of a heritage and art gallery here would demonstrate Portsmouth's ambitions as a 'world class' cultural city, and would be a more effective use of the £15 million set aside for a new city centre road.

In terms of more negatively framed comments, 7 responses were received, (6 from members of the Portsmouth & District Private Landlords Association).

- Concern was expressed that heritage should not impede progress.
- It was suggested that assuming anything over 50 years old is a heritage asset is a mistake which restricts progress and development.
- It was also suggested that a 'cost benefit' analysis should be undertaken of heritage assets in the city, and their cost to the public purse, and the benefits which could accrue to the city from potential re-use of the space they sit in. The city should be rid of unnecessary financial burden.

Historic England (HE) - the Government's advisor on the historic environment offered lengthy and comprehensive comments on the options. They indicated that the local plan process provides an opportunity to recognise the importance of the historic environment, and its role in delivering wider social, economic and environmental benefits.

They made clear that the views offered at this stage should not be regarded as the definitive comments of Historic England on the plan making process.

They were clear that an adequate and up-to-date evidence base should be the starting point of the plan making process. This should not simply be an exercise in setting out known sites, but in understanding the value to society (i.e. the significance) of sites. As part of establishing this, it may be necessary to:

- Identify assets outside the city's boundary
- Consider asset classes that are currently not well recorded
- Consider parts of the locality that may be worthy of designation as conservation areas off the back of the evidence gathering.

Assessing the likelihood of currently unidentified assets being discovered, it may be appropriate to gather this evidence in a heritage topic paper.

HE asked if the Council has any specific historic environment evidence e.g. An urban survey, an urban archaeological database, a Local list, or a survey of Grade II Buildings at risk.

HE will expect the Council to have an up-to-date and relevant evidence base and to demonstrate in the Local Plan how that has influenced the Plan's policies and site allocations. If the evidence base is weak, HE suggest the Council may need to commission proportionate research in the form of Historic characterisation visual impact assessments, and /or archaeological assessment. They suggest that it may be useful to collect and make publicly available any new evidence generated by the local plan process.

HE are concerned by the absence of any heritage studies, and have indicated that they may be able to assist the Council with additional studies.

The Plan (and Council) should be proactive in the conservation and enhancement of the historic environment. HE consider there should be recognition throughout the Plan of the importance of the historic environment, its role in delivering the Plan's vision and the wider economic, social and environmental objectives for the area. They suggest that policies related to housing, retail and transport, may need to be tailored to achieve positive improvements in the historic environment.

In formulating strategy, HE advise that the plan should address:

- Heritage at risk, and the re-use of buildings.
- The relationship between conservation/heritage assets and Green Infrastructure (GI).
- How development around and/or within heritage assets might better reveal their character and significance.
- How the Historic Environment Record (HER) might assist in identifying and managing the conservation of non-designated heritage assets.
- What implementation partners need to be identified.

HE suggest that the Council should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment. E.g. tall buildings.

HE suggest that wording is included within local plans along the lines of:

“The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers”.

They also suggest that heritage specific development management policies may be needed. A policy or policies for assessing the potential impact of development proposals on the significance of assets should be included. The policy or policies should set out what is required of applicants in terms of:

- Describing the significance of assets
- Assessing the impact of a proposal on that significance

Historic England suggested the following considerations for Development Management policies per topic:

Archaeology

- The preservation of scheduled monuments and other nationally important archaeological sites and their settings; and
- The preservation, in situ, of other archaeological remains or, in those cases where this is not justifiable or feasible, provision is made for excavation recording; and
- Requiring that an appropriate assessment and evaluation is submitted as part of the planning application in areas of known or potential archaeological interest.
- Appropriate publication/curation of findings

Listed Buildings

- Ensuring that proposed alterations, extensions or changes of use to listed buildings, or development in their vicinity, will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings;
- Taking measures to ensure that neglected listed buildings are appropriately repaired and re-used.

Conservation Areas

- Ensuring that development within or which would affect the setting of a conservation area will conserve or enhance those elements which contribute to its special character or appearance;
- Safeguarding spaces, street patterns, views, vistas, uses and trees which contribute to the special character or appearance of that conservation area.
- Where they exist, reference to the fact that Conservation Area Appraisals will be used to guide development in those areas.
- Where up-to-date Conservation Area Appraisals are not available developers are required to submit character statements to demonstrate the impact of the development upon their character and appearance of the conservation area.

Historic Parks and Gardens

- Safeguarding features which form an integral part of the special character or appearance of the Park or Garden;
- Ensuring that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration;

Locally important heritage assets

- Setting out definitions of what constitutes a locally important or 'non-designated' heritage asset.
- Providing criteria for their assessment for development proposals, including alteration and extension, and demolition.
- Ensuring applicants are required to demonstrate significance and setting out information requirements for applications.

General Comments on Design

The Plan needs strong design control so that the city is not exploited for short term gains.

Refurbish the Hard (including Brunel House), Boathouse No 4 and Portsmouth Harbour, Portsmouth and Southsea and Fratton Train Stations

Initial Council Response:

There is clearly a balance to be made between conserving the historic environment and economic development, but this need not be an "either/or approach". The role historic assets can play in enhancing and adding value to regeneration will be considered in each of the strategic sites and broad area proposals. The Council needs to reflect on the advice the Historic England and consider if any element of the evidence base requires reviewing and updating. Further work could be site-specific in nature, where particular assets are affected by development proposals, or more broad in nature.

Density of Development Issues and Options

Density of Development Option:

- **DD1.** Follow NPPF and seek higher residential densities in areas of high accessibility.

17 individuals/organisations responded on the question of density, including: **Milton Neighbourhood Forum, Portsmouth's Tackling Poverty Steering Group, SUSTRANS, and Portsmouth & District Private Landlords Association.**

Of these responses 13 either did not agree that higher residential densities should be sought, or went further suggesting that the proposal should be resisted, and densities reduced. A range of reasons were provided for this including:

- Option to continue high density housing is wrong.
- Contradicts health and well-being objectives.
- Is unsuitable for areas of high deprivation, and would result in greater deprivation and stress.
- To avoid strain on the city's infrastructure and amenities.

4 responses (including 3 from representatives of **The Portsmouth District Landlords Association**), agreed that higher densities should be sought. They also suggested that the area between Somers Road and Victoria Road North should be classified as highly accessible.

Space and Environmental Standards Issues and Options

Space and Environmental Standards Options:

- **SES1.** Pursue nationally prescribed minimum internal space standards.
- **SES2.** Seek to deliver a significant proportion of homes which can be adapted to meet different accessibility standards.
- **SES3.** Seek higher standards for water efficiency than the minimum building regulation requirements.

8 responses were provided on space standards. These included comments from local amenity group **The Portsmouth Society, The Milton Neighbourhood Planning Forum** and **Portsmouth's Tackling Poverty Strategy Steering Group.**

5 of these responses indicated support for an increase in space standards, (one suggesting re-adoption of the generous 'Parker-Morris' standards).

In addition, the extension of minimum standards to the provision of 'natural' outside/green space was also advocated by 3 respondents.

SES 2 Adaptable Homes

4 responses were received (3 from members of the **Portsmouth & District Private Landlords Association**), asserting that the option SES 2 (to deliver a proportion of homes which can be adapted to meet accessibility standards) is too weak. New homes should be built with widened doors and level access, as should any new business or commercial premises.

SES 3 Standards for Water Efficiency

Portsmouth's Tackling Poverty Steering Group indicated support for higher standards of water efficiency.

The Environment Agency (EA) commented in some detail on the question of water supply and disposal. Their response is outlined below:

- it is important that Portsmouth City Council contact Southern Water to ensure that there is capacity both within the sewerage system and at the relevant treatment works to accommodate the quantum of development proposed.
- In terms of water supply, Portsmouth City Council should consult with Portsmouth Water to ensure they are confident they can supply water for the quantum of development proposed.
- For information, the water companies are currently undertaking a review of their water resource management plans and this process accounts for proposed new development in Local Plans. We have obviously been involved with the work related to the development of the PUSH Integrated Water Management Study and as stated in your document this should identify actions required to support further housing growth in Portsmouth both to supply water and to deal with waste water to ensure protection and where possible improvement to water quality in Portsmouth Harbour.
- This should be used as evidence to support your plan and the outcomes of the study should be taken account of when considering location, quantum and phasing of development. We are pleased that you have proposed to 'seek higher standards for water efficiency' as one of your options, this is important given the challenge that water resources present in the wider PUSH area and beyond. We would support water efficiency measures being incorporated into new development wherever possible.

Natural England also commented that consideration could also be given to a retro-fitting programme for water meters in line with best practice.

Other comments on Heritage, Design and the Built Environment

A number of other points were also made including:

- The topography of the city does not lend itself to tall buildings, attempts to encourage and increase towers are misguided.
- The city's built environment looks poor. A number of recent schemes have fallen short as a result of errors.
- The Council should undertake more building work itself, and improve its consultation with residents.
- The city needs council housing, not 'affordable housing'.
- Portsmouth Cycle Forum commented that: Improved cycle access to Portsdown Hill would help to achieve targets for health improvement, and access to green space.

Initial Council Response:

It is not necessarily the case that higher density development is lower quality. However, the concerns expressed about higher density development are acknowledged and understood. The general desire for higher space and environmental standards is recognised – further work will be required on deliverability and viability but the aspiration is there. There is a need for further work with the water companies and the Environment Agency on the appropriate approach to water standards.

8. Tall Buildings

74 comments received regarding this topic.

Do you agree with the description of issues regarding tall buildings? What other issues are there to consider?

Seven responses directly stated that they agreed with the description of issues regarding tall buildings, with no further points to make. Other points made:

- Tall buildings should meet the needs of all residents regardless of wealth.
- Tall buildings are acceptable in moderation and where they fit in with the surroundings.
- Tall buildings need to meet safety standards - and the capacity of local emergency services.
- The impacts of increasing urban density.
- Addressing parking provision and capacity issues - underground parking is a possible solution.

Portsmouth Labour Party, GMB commented that the Council should ensure all older tall buildings are retrofitted with sprinkler systems as all tall new builds are required to do by law.

However, seven comments were against tall buildings in the city of any kind. Individuals stated that they felt tall buildings are unsuited to Portsmouth and detract from the character of the city; there was also the belief that there are already too many tall buildings. Other issues:

- Tall buildings would not provide affordable, inclusive or sustainable homes - not accessible by all members of the community.
- High rise living promotes greater social deprivation. It fails to promote community living and can cause isolation of residents, leading to depression in some. They can also create spaces that encourage anti-social behaviour and other crime.

Design

Issues of design of tall buildings were commonly raised. **Historic England** observes that tall buildings in inappropriate locations and/or of poor design can detract from the significance of heritage assets. Other points include:

- Consider tall buildings in the context of their environment and use appropriate colours - e.g. no brash colours such as yellow which dominate the view.
- Quality needs to be considered over quantity.
- Public access to roofs and other high level 'piazzas' should be considered as well as chances to join up disconnected areas.
- Tall buildings of good or iconic design should be encouraged wherever the additional population density can be absorbed by local public transport.
- View lines along the seafront should be protected and the present low level of buildings on the eastern corridor maintained (with the Langstone Campus block demolished).
- Partner with research labs at the University Architecture School in order to address design and public realm aspects of tall building design.
- One respondent commented that there should be no tall buildings within 800 metres of any historic or conservation asset, or shadowing any public open space or sports facility.

Relating to design and biodiversity, **Hampshire & Isle of Wight Wildlife Trust** state it is important that the design and locations of tall buildings are fully scrutinised as situated in the wrong location they can be extremely dangerous to migrating bird species. It is important not to restrict assessments to coastal birds, since smaller songbirds will also be vulnerable particularly when they are 'grounded' when migrating during periods of bad weather or at dawn (most are nocturnal migrants).

What options do you think the Council should follow in the new Local Plan? Are there any other options we should be considering?

Tall Buildings Options:

- **TB1a.** Continue the current approach to discourage tall buildings outside of defined locations; or
- **TB1b.** Actively encourage tall buildings in new locations across the city.

Option TB1a

Six respondents, including **PCC Public Health**, **The Portsmouth Society** and **Portsmouth University**, support option TB1a, to have preferred locations for tall buildings. It was thought that:

- Tall buildings are out of character with much of the city and should be confined to certain areas.
- Groups of tall buildings are more aesthetically pleasing than single stumps.
- Keep tall buildings within currently defined areas unless significant transport improvements can be achieved.
- Higher residential units could be encouraged in defined areas (5-10 floors).

PCC Public Health prefer this approach as tall buildings can cause 'severance' which discourages movement around the city by pedestrians, for whom tall buildings can act as barriers. Severance discourages active travel, thus decreasing physical activity, and increasing social isolation, which can lead to mental health problems.

While **Portsmouth's Tackling Poverty Strategy Steering Group** supports the direction of Option TB1a, they would be against increasing the population density in the existing highest density areas.

The **University of Portsmouth** support TB1a but add that where new tall buildings are proposed outside of these locations, they are considered on their own merits against a specific tall buildings policy. For example, where there is a taller building(s) on an existing site that is outside a tall building location, this should not necessarily mean that a replacement or taller building should not be encouraged. Instead, there should be an opportunity to promote the merits of the replacement / new taller building(s) based on the character of the site and other normal development management considerations.

Option TB1b:

Two respondents, including the **Portsmouth & District Private Landlords Association** supported option TB1b. While context is important, this approach is less stifling to development. One respondent remarked that Portsmouth needs more tall buildings all along the seafront and harbour front areas and that a big impact development of this nature is essential for the Northern Quarter.

Another respondent said that "tall buildings should be actively encouraged throughout the city when they can imaginatively replace existing poor quality provision."

Alternative Options:

Historic England suggests developing a detailed criteria-based policy that ensures that tall buildings are only permitted where they would not have an unacceptable adverse impact on the significance of heritage assets. Whichever Option is chosen, it should be underpinned by an assessment of the capacity of the city for tall buildings and of appropriate, inappropriate and sensitive locations, linked to an assessment of important views within, out of, in to, and across the city, as part of the evidence base for the Plan (and the further work as identified in the document). They add that the existing Tall Buildings Study is eight years old and may need updating, using an up-to-date methodology.

One respondent felt that a well-planned combination of TB1a and TB1b would be the logical answer. Landsec (Gunwharf Quays) took a similar position, making the following points:

- The new Local Plan (and via an updated Supplementary Planning Document) should define specific locations for tall buildings across the city as well as retaining the exceptions policy test under existing Core Strategy Policy PCS24.
- However, the new Local Plan should also reconsider the suitable areas for tall buildings informed by a robust evidence base and context assessment. Landsec supports the identification of The Hard area as a suitable location but considers, in light of the contents of section 7.8(1) of the Tall Buildings SPD, that the area should be expanded to include the Gunwharf Quays and surrounding area. This is because the existing SPD is positive about tall buildings in the Gunwharf Quays area but they consider the current opportunity area around The Hard is too small.

No tall buildings

A number of respondents proposed that tall buildings be discouraged and not be allowed in the city at all due to the city's layout and heritage. A couple of respondents stated that tall buildings significantly detract from the character and live-ability of the city. It was also stated that the height of new buildings should be limited.

Locations for Tall Buildings

- **Northwood (Lakeside)** considers that their site remains a suitable location for tall buildings.
- Areas in or adjacent to the city centre - particular for student density.
- Sites such as Kingston Crescent, Ferryport and the Western Road.
- Vacant Brunel House at The Hard.
- The old BT building in Cosham.
- A residential building with apartments could be appropriate at the old MOD site at Eastney, or a care home for the elderly.

Residents of Port Solent Association would oppose any proposals to erect tall buildings within or on the borders of Port Solent. One respondent commented that Cosham High Street does not need any more tall buildings.

The Portsmouth Society consider that Admiralty Tower is a good example of a tall building.

Other comments:

- Remove current high buildings from areas where they destroy heritage assets, and create proper public space around those that remain.
- Increase provision by raising bungalows another story.

Initial Council Response:

The role tall buildings can play in delivering investment, regeneration, new homes and other uses to the city is clear. The consultation responses outline a range of concerns and sensitivities about their suitability in all locations. The issues raised in the consultation need to be considered carefully. In addition to the considerations listed here, further investigation will be given to the operation of the current plan policy, in terms of applications made and pre-application enquiries received, this work will inform an assessment of whether the current approach to encourage tall buildings in certain parts of the city is restricting the overall capacity of the city to attract and support such developments.

9. Natural Environment

62 comments received regarding this topic.

Do you agree with the description of natural environment issues? What other issues are there to consider?

Nine respondents directly agreed with the description of natural environment issues and the overall approach. Others (including the **RSPB**) felt that it lacked ambition for the environmental protection of Portsmouth as well as clarity and detail - and that the short length of the chapter was indicative of its level of importance in the document. Overall, the preservation and enhancement of the natural environment should be stronger - and made a key objective for the Local Plan.

Other issues to consider for the natural environment chapter are as follows:

Portsmouth Context and Scope of the Topic

The Plan should include recognition that Portsmouth's environment as an island city is what makes it unique - and that the marine environment is therefore a key consideration for Portsmouth (**Environment Agency**).

The topic should include air quality, noise, odour and water quality and threats such as urban pests. Specifically:

- Sewerage system capacity and the levels of discharge into Langstone Harbour.
- The importance of the Portsdown Hill aquifers for city's water supply.
- **Environment Agency** request more specific reference to water quality and the Water Framework Directive with its objectives to prevent deterioration of water quality and gain improvement where possible.
- **Natural England** advise that concerns have been raised with regard to Southern Water's Draft Water Resources Management Plan and a public inquiry is being held to address these issues. Water resource issues should be included in the HRA screening assessments until the outcome of this inquiry is known.

Currently the chapter has a focus on protected sites of importance for biodiversity. The Plan should go beyond this to include:

- Interrelation of how biodiversity importance relates to green spaces, transport, health and quality of life.
- The value of the natural environment and particular sites for the well-being and amenity of local residents and visitors (e.g. Farlington Marshes and the seafront), as well as their protected status.
- Green infrastructure and connectivity of green spaces.
- Access to the natural environment for all.

Biodiversity Issues

RSPB requests that the Plan includes: recognition of the contribution of Local Wildlife Sites, a map of sites of nature conservation importance and further explanation on developer contributions -

including clarity on the qualifying impacts and how such funding would be used. The Local Plan should also recognise that waders as well as Brent Geese are both SPA features.

Butterfly Conservation Organisation would like to see the inclusion of the butterfly and moth species in need of protection and conservation in the Portsmouth area (including the Small Blue, Chalk Hill Blue, Grayling, Wall Brown, White-Letter Hairstreak and Coleophora Vibicella species) which are noted in the Butterfly Conservation's Regional Action Plan for South East England and Section 41 in the Natural Environment and Rural Communities (NERC) Act 2006 (except the Chalk Hill Blue).

Other Strategies and Evidence work

Natural England and the **RSPB** highlighted the following:

- PUSH commissioned detailed studies on the impacts of the new housing development on the water and air quality environment.
- Reflection of the position on recreational disturbance resulting from new development from the Strategy for the Solent Recreation Mitigation Partnership.
- Solent Wader and Brent Goose Strategy - RAPS (Residents Association of Port Solent) request that Port Solent is included in the scope of this study.

Area/ Site Specific Suggestions

Requests were made to recognise the following:

- The potential Solent and Dorset Special Protection Area which covers Portsmouth Harbour.
- Conservation and enhancement of Eastney Beach and its rare vegetated shingle.
- Fraser/SINC site.
- Coastline areas such as the Langstone campus
- M275 entrance to the city should be made into a showcase for the city's natural environment.
- Natural England encourage early engagement on the scope of Biodiversity Mitigation and Enhancement Plans (BMEP) for the proposed strategic development sites in the city.

Do you agree with the proposed preferred option on the natural environment for the new Local Plan? Are there any other options we should be considering?

Natural Environment Option:

- **NE1.** Define the different levels of protection that will be given to spaces depending on their importance for biodiversity.

Again, a number of comments felt the Option, and the supporting chapter, do not go far enough in its detail, scope or ambition - including in terms of the strength of environmental protection proposed.

The Plan should seek maximum protection and enhancement of environmental assets (6 comments) - particularly due to the density of development in Portsmouth and the relative lack of

greenspace. Loss of the natural environment would conflict with the Plan's health and well-being objectives.

Some do not agree that it is possible to mitigate environmental impacts (such as biodiversity offsetting) (4 comments), particularly in monetary terms, so it was considered that this should not be an Option in the Plan.

One respondent felt having different levels of protection for environmental assets would encourage challenge from developers.

While the **RSPB** support the hierarchy approach when considering spaces according to their importance for biodiversity, the Option does not provide detail as to how the Council intends to assess the relative biodiversity value of spaces.

Natural England states that the Option should give specific consideration to the qualifying features of the international sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites), the interest features of the national sites (Sites of Special Scientific Interest (SSSI)) and other wildlife sites (County Wildlife Sites, Local Nature Reserves, Sites of Importance for Nature Conservation). Consideration also needs to be given to sites used by the qualifying and interest features of the designated sites as well as other sites of importance for biodiversity.

The **Hampshire and Wildlife Trust** state that it is unclear what the Option is seeking to achieve. To merely "define the different levels of protection that will be given to spaces depending on their importance for biodiversity" does not promote the protection or enhancement of those habitats, nor does it seek to protect areas or species that are located outside of the protected areas. Wildlife outside of protected areas, or dwindling but non-endangered species, are declining in part due to the hierarchical approach to nature conservation.

Alternative Options:

Seek to preserve and where possible extend existing green space networks to create green corridors throughout the city.

The Hampshire and Wildlife Trust suggest the Council should instead look to identify the species and habitats that are present and then use this information in conjunction with other studies to inform its approach to protecting biodiversity in the City.

Natural England and a number of other respondents think the Plan should actively seek biodiversity enhancement and net gains for biodiversity in Portsmouth through a range of small scale measures for new development (e.g. green roofs, roosting or nesting provision on buildings, more street trees, wildflowers) and through Biodiversity Mitigation and Enhancement Plans (BMEPs) approved by a Hampshire County Council ecologist. Rather than focus just on areas with defined environment status, this would give all areas of the city the opportunity to contribute to biodiversity. An Exeter City Council Supplementary Planning Document on the topic is cited as an example. Such an approach would ensure the Plan is in line with the requirements for biodiversity enhancement in the NPPF.

Other Comments

- Once areas of the natural environment are damaged they could be lost permanently.
- All environmental regulations must be followed in the plan process.

- Sites such as Victoria Park and St James' Hospital 'belong' to the people of Portsmouth and should not be developed upon.
- Sustainability Appraisal of the Plan does not go far enough and 'convenient' rather than "correct" decisions are being presented.

Initial Council Response:

Key designated sites, such as Portsmouth Harbour and Langstone Harbour, are subject to the highest level of nature conservation protection and this can lead to a focus on those areas with less consideration of the potential for other areas to contribute toward biodiversity and the broader environment. Officers will continue to work with statutory consultees and key organisations to address potential impacts on those other sites and species. In addition, a Green Infrastructure assessment will consider the potential for other added value for the environment across the city.

10. Transport

119 comments received regarding this topic.

Do you agree with the description of issues regarding transport? What other issues are there to consider?

Many of the responses discussed the importance of strategies for transport as being very important in the Local Plan.

Other responses suggested that the description of issues was too optimistic given the rising levels of car ownership and perceived poor public transport network in the city.

Others considered new transport infrastructure will be essential for alleviating pressure on the limited land available and recommended strengthening land and water links.

Public Transport

A number of respondents raised concerns about bus services in the city:

- They are underused, expensive and infrequent.
- Many services do not run late enough into the evening or to the right places to make them a viable alternative to the car.
- Concerns that the operator is cutting services.
- Much of the eastern side of the city is poorly connected.
- It is often quicker to walk than use public transport.
- It is often cheaper to use a private hire vehicle rather than buses.

Comments were also received from a number of respondents, including the **Portsmouth Liberal Democrats Group**, that make suggestions for improving public transport in the city:

- More traffic free bus lanes are required.
- Buses should be under municipal control, operated on a non-profit basis.
- Consider rapid public transport systems and sustainable personal travel.
- More should be done to promote water transport for commuting purposes.
- Public transport services to the fringes of the city should be improved.
- Provision of a monorail should be investigated.

Other respondents noted that the city has good external transport links but poor internal links.

Suggestions were made to locate development close to locations with good rail services, and to do more to promote rail travel rather than car to existing locations.

Modal Shift and Active Travel

Many responses supported the need to improve walking and cycling infrastructure in the city and suggested that a holistic approach was needed, rather than the current piecemeal approach.

Others suggested that active travel is not practical for family travel and it cannot be expected that people will change their lifestyle to travel sustainably.

A number of issues with the current walking and cycling infrastructure in the city were identified:

- Perceived safety issues make cycling unpopular.
- Cycle theft is a big issue in the city.
- Existing provision is considered insufficient and dangerous and poses a risk for pedestrians and cyclists.

Respondents, including **Sustrans** and the **Portsmouth Cycle Forum**, made suggestions about how infrastructure for active travel could be improved:

- There should be policy developed to reduce the number of cycling casualties.
- There should be a continuous network of cycle infrastructure throughout the city for both strategic and local journeys for confident and beginner cyclists.
- Make use of the new flood defences to create a cycle corridor.
- The assessment of 'walking zones' around district shopping centres would help to identify where more work is needed.
- Cycle specific lanes, whether dedicated or shared, need to be built to the same standards as roads rather than footway specifications leading to lower maintenance costs.

Air Quality

Responses discussed the issues with air quality in the city and noted that this has an impact on health and wellbeing of residents and the number of people willing to walk and cycle.

Responses, including that from the **Portsmouth Liberal Democrat Group**, noted that high levels of traffic congestion, population density and large in and out flows of traffic needed to be addressed in the Plan.

In order to address issues of poor air quality and the impact this has on health and wellbeing, suggestions were made to:

- Conduct predictions for future levels of traffic and air quality
- Improve public transport provision
- Create safe and continuous walking and cycling routes

Highway Safety

A number of respondents, including **Friends of Old Portsmouth** and **The Milton Neighbourhood Forum** raised concerns about road safety:

- Walking and cycling in the city is considered dangerous, as shown by the high number of accidents and deaths
- 20mph speed limits are not being adhered to and not enforced which has safety implications, particularly for vulnerable road users
- 20mph speed limits and cycle lanes painted on the road are not enough in isolation to solve safety and congestion issues. There need to be physical measures and a joined-up transport strategy.
- On street parking causes safety issues for cyclists, car drivers and pedestrians and adds to congestion
- Concerns about cyclists riding on the pavement. Particularly an issue for children, mobility impaired and the elderly.

It was suggested that the data used to inform the plan needs to be updated and PCC should consider national strategy on road safety and encouraging modal shift.

Electric Vehicles

Respondents, including the **Portsmouth Liberal Democrat Group**, noted that Portsmouth is one of the worst cities in the UK for accessible EV charging points. There should be heavy investment in EV charging points to make new development and existing terraced housing fit for a carbon neutral future. Consider provision of electric buses.

Congestion and Parking

A number of respondents, including **Sustrans**, **Portsmouth Cycle Forum**, **Portsmouth Liberal Democrat Group** and **PDPLA**, suggested that consideration should be given to a number of issues in preparation of the Plan:

- Parking for cars and bicycles, given the high levels of terraced housing.
- Emergence of electric and autonomous vehicles that will impact on air quality, parking and congestion. How to plan for the future without spending too much in the interim whilst technologies emerge.
- Lack of unrestricted east-west flow across the island.
- Poor linking-in of M275 to local arteries.
- The general trend for reduction in driving licenses amongst younger people.
- Thousands of new homes being built along the M27 corridor and the impact this will have on the road network.
- The need to provide high quality shopping, leisure and employment in the city to prevent the need to travel and add to congestion.
- The impact that Gosport/ Fareham commuting traffic has on the road network in Portsmouth.
- Working with the University to prevent students from bringing their cars to the city.

**What options do you think the Council should follow in the new Local Plan?
Are there any other options we should be considering?**

Transport Options:

- **TR1a.** Transport Infrastructure provision. Seek transport schemes to support the development planned to take place. Including:
 - South East Hampshire Bus Rapid Transit future phases, including: Fareham to Queen Alexandra Hospital (QAH) in Portsmouth (three routes), Clanfield/ Waterloo to Portsmouth/ Southsea (two routes) and Havant to Portsmouth (three routes);
 - Links between Tipner and Horsea Island allowing buses, cyclists and pedestrians access between Tipner West and Horsea Island East, the new country park, Port Solent and beyond. Car access would be limited to the business space created in Horsea Island East.
 - City centre road improvements to improve capacity.
 - Park and ride expansion to create additional capacity.
 - Improved rail service to London.
 - Improved rail journey time between Portsmouth and Southampton.
 - Smart Motorways to improve the M27 links to Southampton and intermediate towns.

- **TR1b.** Supplement transport infrastructure with transport congestion measures. Including:
 - A comprehensive electric vehicle charging network across the city for residents, businesses and visitors.
 - Marketing and behaviour change activity to support infrastructure schemes and generate mode shift.
 - Public realm improvements to improve the environment and quality of place for those travelling through areas giving priority to pedestrians and cyclists over motorised vehicles.
 - Road safety education and enforcement campaigns and activities at targeted modes and groups.
 - Working with stakeholders to identify the best solutions and for collaborative delivery where appropriate.
 - A network of continuous cycle infrastructure throughout the city for both strategic and local journeys, confident and beginner cyclists.
 - Redevelopment of Portsmouth and Southsea, and the Harbour Stations.

There was some support for Option TR1a, with respondents, including **PCC Public Health** and **Gosport Borough Council**, making suggestions for how this option could be expanded or amended:

- Suggest also including new train stations such as Paulsgrove, Drayton and Farlington.
- Longer term consider a tram system.
- Improvements need to be made now, not just when development comes forward
- Need to also include safety improvements.
- Also include car sharing lanes as well as smart motorways to cut down on congestion and pollution and improve travel time.
- There may also be opportunities to improve water transport services around Portsmouth Harbour and along the Solent including water passenger services through to Southampton.
- Transport schemes that take place as part of planned development should also include better walking and cycling infrastructure.
- A number of respondents, including the **Friends of Old Portsmouth Association** raised concerns about Options TR1a:
 - Increasing road capacity will only lead to increased traffic, leading to more congestion and further reduced air quality.
 - Building more roads will not aid the aim of reducing private car use.

Others, such as the **Portsmouth Cycle Forum**, only agreed with some aspects of Option TR1a:

- Strongly agree with Park and Ride expansion. Suggest Portsmouth build at least 2 additional P&R locations with improvements to bus lanes to reduce congestion on the island.
- Agree roads need to be improved, but this should involve redesigning so that they are suitable for forms of transport other than the private car.
- Support development of bus rapid transit links in the city.

Residents Association of Port Solent agreed with the provision of a link between Tipner and Horsea Island but suggest that this should be for all vehicles to relieve pressure on the junction of Port Way and M27.

There was strong support for Option TR1b above Option TR1a, with the following points noted from a number of respondents including **Friends of Old Portsmouth, Sustrans, Gosport Borough Council, Portsmouth Cycle Forum and Portsmouth's Tackling Poverty Strategy Steering Group**:

- Infrastructure for active travel needs including walking and cycling are more efficient, safer and more convenient than using a motorised vehicle.
- Agree that vehicle use should be decreased. Pedestrians and cyclists must be given priority and safety improved.
- There may also be opportunities to develop stronger 'through-ticketing' public transport across the sub-region which incorporates automatic discounted travel.
- Potential for active travel is huge if new development follows the example and design standards in London.
- Also suggest installing EV charging points in lampposts.
- Filtered permeability should be listed as an infrastructure option to convert short trips to foot or bicycle.
- The Plan needs to ensure that the transport network is inclusive and accessible to all.
- Should include emphasis on improvements to cycling safety and improved park and ride and rail services.

Some respondents queried aspects of Option TR1b:

- The promotion of EVs will not reduce congestion or tackle obesity or road safety.
- It is not realistic to force the population to change its lifestyle.

Options TR1a and TR1b - **The Portsmouth Society** call for links to the South Hampshire Metro as well as more bus priority measures and special measures for football matches and other events. There should be a traffic management system in place for events. There needs to be a focus on EVs in light of Government policy. There should be more trees and shrubs by roads to improve air quality. IOW ferry terminal should be relocated to Portsmouth International Port.

There was support for a combination of aspects from both Options TR1a and TR1b with many respondents noting that these are not either/ or options and both have aspects important for investment. Responses listed the following as the most important aspects to be combined:

- Improvements to the cycle network.
- A combination of improved capacity and modal shift to reduce congestion.
- Strong support for the bus/pedestrian/ cycle link between Tipner and Horsea Island.
- Improving journey times on strategic road network using smart motorways to reduce congestion on local roads.

Other Options to be Considered

Respondents made suggestions for other options that could be considered:

- There needs to be options to rectify the existing transport problems rather than just for new developments.
- Introduce charges for homes with more than one car with monies raised invested in the road network.

- Consider a monorail/ tram/ metro service.
- Consider bus only routes to prevent traffic queuing outside of homes.
- There should be signed, safe and attractive walking routes connecting neighbourhoods within the city centre.
- Introduce congestion charging with a higher charge for more heavily polluting vehicles.
- All new development should be required to pay for signage giving direction and distances to walking destinations.
- On street parking should be eliminated in new developments and there should be strict rules on parking provision.

A number of responses, including those from the **Milton Neighbourhood Forum** and the **Portsmouth Fabian Society**, also made suggestions to include options specific to certain areas of the city:

- Prioritise pedestrians at key junctions such as Fratton Road, London Road, Eastern Road, as at present infrastructure is weighted in favour of the motorised vehicle.
- Make improvements to cycle infrastructure along the seafront to improve safety for cyclists and pedestrians.
- Create a cycle route from Fratton station to Hilsea.
- Allocate land for a rail-freight link along the M275 corridor to the commercial port.
- Make improvements to the Eastern Corridor to include: synchronised traffic lights; improved pedestrian crossings and filtering improvements onto M27.
- Extend the park and ride to serve Southsea and the east of the city.
- Need to widen road from Mile End through to Gunwharf.
- Consider a tram through the city towards Waterlooville.
- Consider a Milton bypass along Langstone shoreline.
- Suggest opening some of the stopped-up roads and removing some of the restricted right turns, in particular Velder Avenue to Milton Road to aid traffic flow.
- Suggest introducing a variable flow system along Eastern Road so more traffic lanes are available to the direction of highest flow, allowing this to change as direction of flows change.
- There should be investment in public transport along Fratton Road/ Kingston Road/ London Road to reduce air pollution.

HCC Countryside Service would be keen to work with Portsmouth City Council to improve connections between Hampshire's and Portsmouth's rights of way network. Improvements would help enhance sustainable travel links, as well as providing health and wellbeing benefits to local residents.

Other comments on Transport

- Vans parking in residential streets are an issue for congestion and parking. There should be a specific area for them to park or provision made by businesses to park their vehicles.
- There needs to be real time bus information at all bus stops.

- Railway stations need to be cleaned up and trains need to have space for luggage. This is poor compared to stations and trains in Europe.
- Get rid of the bus lane from the Park and Ride along the M275. It takes too long to travel by car along this road.
- Need to consider parking for Southsea residents.
- Consideration should be given to accessibility for disabled people.
- Issues with traffic being halted in Old Portsmouth due to traffic jams from the IOW Ferry.
- Start a scheme with rail operators to have a well-priced travel ticket in the Portsmouth travel to work area.
- Allow residents aged 60 plus to have a bus pass. This will relieve congestion and encourage greater use of buses.
- Transport will be important for those in shared housing as this type of housing becomes more common in areas with parking restrictions.
- It is near pointless to improve transport as long as there is no limit on car ownership. Suggest all residents intending to buy their first car to have proof of an off-road parking space in order to acquire the vehicle road licence. All new estates should ban overnight on-road parking.
- Suggest use of underground parking facilities.
- Limit parking permits to a maximum of two per household for on street parking.
- Bus services in the city are relatively good.
- Do more to help cyclists and motorcyclists.

Initial Council Response:

Effective transport networks are critical in the development of vibrant, economically active communities, and have a key role to play in supporting the growth and development of Portsmouth. Individual regeneration projects and development sites, such as Tipner, must be supported by appropriate transport infrastructure promoting active and public travel from the outset, as well as integrating effectively with the wider network with no unacceptable impact. The Local Plan will be supported by a transport evidence base which enables an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at a plan-making level. Following the adoption of the new Local Plan the Council will bring forward a new Local Transport Plan, outlining how investment in the local transport network will support the aspirations of the Local Plan. This will build on the extensive programme of work currently underway addressing many of the issues raised through this consultation including:

- Development of an Air Quality Action Plan, demonstrating how Portsmouth will deliver on the aims and objectives of the recently adopted Air Quality Strategy. Also an assessment with neighbouring authorities to consider current and future air quality impacts of proposed growth
- Pilot projects for both off and on-street electric vehicle chargepoints.
- Working with stakeholders, including the DfT, to develop a Local Cycling and Walking Investment Plan.
- A package of measures to improve transport by all modes on the Eastern corridor.
- Bringing forward proposals for a new City Centre Road to the north of Commercial Road.
- An intelligence led programme of road safety and behaviour change campaigns to promote the safe use of walking and cycling within the city.
- Pilot of Intelligent Transport System technology through vehicle to everything (V2X) communications, creating additional capacity across the network.
- Traffic Signal Optimisation Programme to improve traffic flow at key signalised junctions.

11. Other Planning Issues

39 comments were received regarding this topic.

Do you agree with the description of other planning issues? What additional issues are there to consider?

Six respondents agreed or broadly agree with the description of other planning issues set out in the Issues and Options document covering Sustainable Development, Delivering New Infrastructure, Flooding and Climate Change.

Sustainable Development

- Insufficient weight is being given to the social and environmental costs of development in all 'Issues' e.g. housing numbers are not based on what is socially or environmentally sustainable in Portsmouth.
- The **Hampshire & Isle of Wight Wildlife Trust** made the point that to achieve sustainable development, the protection and enhancement of the natural environment should be given equal weight to health and well-being of residents. Farlington Marshes is a good example of multi-functional green infrastructure but needs to be part of a wider network to prevent the decline of biodiversity.
- **Barton Willmore** comment that there is significant potential to accommodate new development in the city - more efficient use of land in existing industrial/commercial areas to meet the changing requirements of occupiers and the work force and by increasing densities around key transport nodes. They recommend greater utilisation of the 'untapped opportunity' of university graduates for the economy (see further comments in section 3)
- **Hampshire County Council** consider the approach to the minerals and waste and the safeguarding of sites to be appropriate at this stage.

Delivering New Infrastructure

Infrastructure and local service provision was raised in a number of responses with concerns that the city's current infrastructure is already inadequate (particularly transport, health care and education), and negatively impacting the quality of life in the city. It was requested that current capacity should be addressed first, before any further development or population growth. Impacts of student numbers from the University of Portsmouth on the capacity of the city for housing, parking, congestion and amenity were particularly noted, as well as the impact on 'false' inflation of population trends.

Concern about future growth on:

- Capacity of South Downs water resources to sustain the growth in the PUSH region, exacerbated by the impacts of climate change.
- Reductions in school play spaces due to rising class sizes - could be contributing to child obesity issues.
- Disproportionate impacts on particular areas of the city - e.g. the impacts of Gunwharf Quays and Portsmouth University on Portsea.

The need for a new Infrastructure Delivery Plan was supported. It should cover the provision of new schools and apprenticeship schemes (consider quality of education at all levels as well as quantity), council housing, care home provision, improvements to sustainable transport and medical facilities, shops or post boxes, cemeteries and allotments. The approach should include:

- A city-wide view of requirements, rather than per development site.
- Co-ordination of all services which require land and infrastructure to avoid reactive policies in the future.
- Availability for public consultation before the new Local Plan is adopted.
- An approach to cycle infrastructure that ensures flood defence work does not prevent a continuous route along the sea front.
- Consideration of the re-use of Langstone Campus to assist with education provision.

Southern Water advise that new or improved wastewater infrastructure to support new development may be required during the plan period. Where investment may have long lead in times, it will be important that policies are in place that may need to require the phasing of developments to effectively coordinate the delivery of additional capacity in tandem with development. They request that the following is addressed by the Local Plan process:

- Explicitly encourage and support the delivery of utility infrastructure by the relevant service providers.
- Should any site specific local infrastructure capacity constraints be identified, seek to facilitate direct agreements with service providers in order to deliver any requisite site-related infrastructure in a timely manner.

One respondent highlights the discrepancy in forecasting for future pupil place planning (7 years ahead) and the Plan period (15 years).

The Education & Skills Funding Agency note that the Local Plan needs to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements including education facilities. They request the next version of the Plan:

- Confirm the education sites to be allocated and how they will deliver the school places needed to support growth based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan (IDP) and any associated research.
- Site allocations should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. Flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it.
- Specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will need be confirmed at the application stage to ensure the latest data on identified need informs delivery; and that -
- It should note that requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements and is therefore no longer required for school use.

Section 24: Any Other Comments - includes further comments on infrastructure.

Flooding and Flood Defences

The topic of flooding and defences was also a source of some commentary with the following points coming up in the consultation:

- Surface water flooding, rather than coastal waters, is now more common and should be addressed by the Plan.
- The approach to seafront defences should be an integral part of the local plan - including their relationship with public realm and urban design, soft versus hard engineering and their rationales and incorporation of sustainable travel routes (e.g. cycleways).
- The need for balance between protection of low lying areas and the amenities at the seafront, but with safety as a priority.

The **Environment Agency** provided the following advice on development and flood risk:

- In line with the flood risk sequential approach, preference should be ideally given to areas of flood Zone 1. If this is not possible need evidence that the sequential test has been undertaken in line with the National Planning Policy Framework. However, as significant areas of Portsmouth are being redeveloped to provide regeneration benefits, it is important that this justification is provided as part of the evidence base.
- Follow the flood risk management hierarchy in respect of allocated sites wholly or partially within flood zone 3, including consideration of residual risk on sites that fall behind defences.
- Provide evidence that all sites that are being allocated partially or wholly within flood zones 2 and 3 have a reasonable prospect of delivery in terms of flood risk, that the flood risk can be managed and the viability retained, and the sites made safe - this may include phasing of development in line with the development/upgrading of defences.
- They recommend providing the most current information regarding the status of the various sections of defence upgrades as background evidence to support the plan.

Adaption to Climate change

Several respondents raised issues relating to addressing climate change in the Local Plan:

- The approach climate change adaptation isn't strong enough. Look to exceed national targets on green energy and increase green coverage to mitigate against the impacts of additional rainfall.
- An unidentified issue is impacts from the loss of green space from private gardens converted to parking and tree felling etc, increasing runoff, especially in view of increased rainfall.
- Several comments were received suggesting that the Council should actively be doing more to increase the generation of renewable energy - such as placing requirements on all new developments (e.g. solar panels).
- Portsmouth should aspire to become a low carbon city with very high rates of walking and cycling, eco-buildings.
- The Council should plant more trees but ensure their maintenance is efficient.
- The move away from fossil fuels and nuclear energy.

Other Issues

- The plan should be more long-term and more ambitious in scope.
- Address issues such as increasing technology and automation.
- Leaving the EU.
- Attracting employers of the future.

Health and Safety Executive have no comments to make at this time but provide an advice note of the relevant guidance and procedures for the Local Plan.

Winchester City Council suggest that consideration is given to defining the extent of the adjoining built-up area with a settlement boundary and applying 'countryside' policies to the undeveloped part of Portsdown Hill to reflect and protect its landscape, biodiversity and green infrastructure importance.

Other Comments

University should be located outside of the city along with student accommodation.

Relating to transport infrastructure, the Council should consider putting a bike path behind the Harvester on the Eastern Road; improving the traffic flow along Goldsmith Avenue between Winter Road and the White House junction; and better links to the motorway from Eastern Road.

Initial Council Response:

The comments and issues raised here will be given consideration as the plan progresses. The issue of flooding and sea defences will be informed by progress on individual flood protection schemes, including the Southsea Coastal Scheme. The support for an Infrastructure Delivery Plan is also noted.

12. Identified Work

20 comments received regarding this topic.

Have we identified all the technical work which needs to be done? What other plans, policies and programmes should be taken into account when preparing the new local plan?

Two individuals considered all necessary technical work has been identified, but a number of other parties made suggestions for further work which are summarised below.

Housing

One respondent stated there should be an assessment of the types of affordable homes that are required. The size and types of affordable housing required must accurately reflect needs in the city, taking into account policy drivers such as welfare reform.

Transport

Three individuals made a number of points about further studies - the need to consider the government's plans for moving away from petrol/diesel cars. A bus lane. New detailed study required on roads and traffic.

Population, density and health and well-being

The Council should ensure population growth figures are correct and can be shown to be robust.

There should be more technical work to evaluate the social effects of higher population figures and more people living closer together, including impacts upon mental health and increased resources needed for services such as police, health and education.

A number of individuals considered there needed to be more technical work with the Clinical Commissioning Group and NHS on future healthcare, including any need for care bed spaces, access to GP services, bed blocking at QA Hospital, and the health and wellbeing of young people.

Education and Other Infrastructure

The Education and Skills Funding Agency welcomed the commitment to update the Infrastructure Delivery Plan, and recommends that the Council carry out a specific assessment of education needs, to support the IDP and help demonstrate that the plan proposes the most appropriate strategy for addressing the issues around educational attainment and the health and wellbeing of young people, with examples of good practice.

Five other respondents highlighted future education needs and planning for pupil places.

One thought the infrastructure projections are inadequate.

Other topics to consider: Sewers and similar infrastructure and broadband/ Wi Fi.

Viability

One respondent considered the viability assessment should properly consider the health and environmental impacts of the Plan, not just the funding streams.

Ecology

Hampshire and Isle of Wight Wildlife Trust recommended the Council establish the areas that are important for biodiversity, such as through ecological network mapping and use this to inform where development would be best suited. In addition, the Council should address the Lawton Report and look to protect wildlife outside of protected areas, as well as within them.

Another respondent stated ecological studies must be published before the Plan is finalised otherwise it will be the last issue considered and often ignored.

Heritage

Historic England recommended an updated assessment of the capacity of the city for tall buildings and of appropriate, inappropriate and sensitive locations, linked to an assessment of important views within, out of, in to and across the city. The existing Urban Characterisation Study of the city will provide useful information to underpin the Plan, but is six years old and may need updating. Questioned whether there is an Urban Archaeological Database for the city. Heritage issues within the city could be identified and addressed through a Heritage Strategy and if not already undertaken, the compilation of a list of locally important heritage assets, a survey of grade II buildings to identify any at risk of neglect, decay or other threats, and up-to-date conservation area appraisals.

Waste and Energy

One respondent stated recycling is insufficient; consider implementing glass recycling and widening the plastics that can be recycled.

The preparation of a City Wide Energy Strategy was suggested with a focus on eradicating fuel poverty and providing 'clean' fuel for developments.

Initial Council Response:

The need for these additional projects, and their potential to inform the new Local Plan, will be considered as the Plan progresses. For now, the further identified technical work does include housing, population, infrastructure requirements including health and school places, viability, the protection of nature conservation assets and transport.

Strategic Sites

13. Tipner Strategic Site

50 comments received regarding this topic.

Do you agree that Tipner should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?

36 responses, included those received from the **Milton Neighbourhood Forum** and **Paulsgrove Residents Association**, showed support for Tipner remaining a strategic site for development in the new Plan.

One respondent indicated the support for Tipner being a strategic site and suggested that the development of the site is not happening fast enough with a CPO of the land being considered if the site does not progress.

Other respondents noted that they supported the allocation of Tipner as a strategic site, only if certain criteria could be met, including:

- Provision of necessary road improvements and implementation of public transport links.
- Ensure that the land is decontaminated and tested by independent experts before housing is built.
- Provide sufficient healthcare, education and community facilities to serve the new dwellings.
- The SSSI needs to be protected.

Southern Water noted that additional local wastewater infrastructure would be required to accommodate the proposed development at each site. It is required that the development provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.

One respondent noted their support for Tipner as a strategic site, but queried how the overall housing target of the Plan will be met if Tipner is only expected to yield 1250 dwellings.

Non-residential Uses

One respondent noted their support for Tipner as a strategic site, but suggested that it should be used for employment uses rather than residential, due to the contamination of the land.

Another respondent suggested that Tipner West should not be allocated as part of a strategic housing site but should instead become an area of public open space, linked to Horsea Island.

3 respondents, including the **Portsmouth Society**, suggested that given the perceived non-viability of Commercial Road as a shopping destination, the value of Tipner West as a potential shopping / leisure complex should be investigated.

A number of respondents, including **Portsmouth's Tackling Poverty Strategy Steering Group**, suggested that the policy regarding Tipner should be expanded so that the site provides:

- A mix of property types, sizes and tenures
- A range of affordable housing options
- Good levels of accessibility
- Transport links that meet the needs of the whole community.

Wider Considerations

The Education and Skills Funding Agency suggests that the Council consider very carefully the impacts of relocating the Harbour School, a special school for children with Social, Emotional and Mental Health Needs, and work closely with the school to identify all the implications of this before forming an opinion on whether the relocation should be pursued. Any relocation of the school should be to a site of equivalent or better quality and suitability for the needs of the school.

The **Environment Agency** noted that they will continue to work with PCC to bring forward the Tipner sites. It is acknowledged that PCC are aware of the key issues of flood risk, contamination remediation, water quality, the marine environment and European nature conservation designations.

The **RSPB** note that given the proximity of the proposed Tipner site to the Portsmouth Harbour SPA / SSSI - they have serious concerns regarding impacts on the designated features of the adjacent wildlife sites from development in this location. The 'impact upon Portsmouth Harbour SSSI' has been identified as an issue that will require addressing as part of this plan, however, they are very concerned that the plan fails to identify the need to assess impacts to the SPA and its supporting habitats. It is expected that at the next stage of the emerging plan there is a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in The Habitat Regulations would need to be removed from the plan.

Historic England welcomes the recognition of the Grade II listed former powder magazines at Tipner West. The need to retain these buildings in a sensitive re-use and with an appropriate setting should be identified as an issue to be addressed through the Plan.

Other comments on Tipner

- Development of Tipner will require large amounts of money and work as there is limited existing infrastructure.
- Tipner/ Portchester Lake should be undisturbed; perhaps a low key nature reserve or study centre could be located here.
- Tipner, Horsea Island and Port Solent sites are preferable for redevelopment because there would be little impact on current housing and residents.
- Suggest that the Harbour School could be relocated to the St James' Hospital site before plans are finalised for housing on the land.
- Any development of the Tipner site should be sensitive to the cultural heritage of the area and improve public transport links.

Initial Council Response:

Since the preparation of the adopted Portsmouth Plan in 2012 proposals for this area have developed, with the signing of the City Deal with government, the delivery of the M275 junction and the park and ride facility. Planning applications have been received for residential development of part of the site. However, given the significant potential of this area, the presence of sensitive ecological assets and other considerations including flood defences, the presence of Harbour School and listed structures, and the potential for a bridge to Horsea, further work needs to be undertaken to determine appropriate proposals and a way forward for the area as the project moves towards further delivery.

14. Port Solent and Horsea Island Strategic Site

47 comments received regarding this topic.

Do you agree that Port Solent and Horsea Island should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?

Over half the respondents considered that this area should remain a strategic site and the description of the site, issues and opportunities were appropriately set out in the consultation document.

Premier Marinas and CBRE Global Investors welcome the recognition of a wider strategic site allocation within the emerging Local Plan, which includes the Tipner sites, Port Solent/Horsea Island, as well as the existing Boardwalk and car park, as capable of delivering significant residential, tourism/leisure and economic development, including marina-related development. The site could bring forward at least 500 homes with some delivery within 5 years; Port Solent should be identified as a District, not a Local retail centre; the employment allocation should not be set at 3.4ha as this may constrain delivery.

RAPS considered Horsea Island to be better suited to more resident development, accessed via the new bridge to Tipner, rather than Port Solent itself. **RAPS** consider the Plan should maintain the special character of Port Solent, to remove it from the list of Strategic Sites and to find other locations for additional housing, such as Horsea Island (that being dependent on a new bridge link to the M275).

Two people objected due to the loss of open space and the potential for impact upon the harbour environment.

One thought residential development should be the focus of the allocation.

Issues to be addressed:

Some offered qualified support providing impacts such as traffic and other infrastructure can be appropriately dealt with. Others mentioned increased traffic onto Southampton Road which is already congested.

Southern Water note that additional local wastewater infrastructure will be required to accommodate development, and that there is existing wastewater infrastructure which will require an easement which may affect the site layout or diversion.

One respondent commented that issues of land quality, sewers and other infrastructure and road access all contributed towards development in this area not coming forward previously and there are therefore questions over deliverability.

The cycle forum considered this should remain a strategic site with the opportunity to create a walking and cycling bridge to connect Horsea Island to Tipner West.

Port Solent Residents Management Company (POSOL) noted that Port Solent is a working marina and needs to retain its marine functionality e.g. hoist, repair facilities, chandlers etc. In addition, the area considered in the Issues and Options, extends right up to the water's edge on the

south side of the marina basin. POSOL is party to a legal contract with the Council concerning the boat hoist, the yacht repair facilities and the area reserved for the winter layup of yachts and requests to participate in any discussion which affects these facilities. This focus on marine development was supported by **Residents Association of Port Solent (RAPS)** although they were concerned over residential development at Port Solent. RAPS were concerned about the potential damage to the character, ecological value, and views of the site by further residential development, and considered the site should be allocated as open space.

The **Environment Agency** have noted previous discussions and identified key issues - the closing landfill site and any contamination associated with this, along with potential flood risk, water quality in the harbour and the European nature conservation designations. Careful consideration will need to be given to any new road that is proposed as part of this due to potential instability issues linked to the historic landfilling.

The **RSPB** has raised serious concerns regarding impacts on the designated features of the adjacent wildlife sites from development in this location. The Issues and Options document should note this in the interim Sustainability appraisal in para. 6.21 and the SSSI/SPA designation should be highlighted in the Local Plan and appropriately assessed. The next stage of the emerging plan, should be accompanied by a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in The Habitat Regulations would need to be removed from the plan.

HIWWT have raised concerns that sites within this strategic site allocation have been identified as being part of the 'core network' of sites used by overwintering waders and brent geese. Sites in this plan and those in neighbouring authorities have been identified as being of importance for over wintering waders and brent geese and any assessment should look to consider potential adverse impacts in combination with other plans or projects. RAPS has also highlighted the potential for disturbing Brent Geese on and near the site.

One person thought the Boardwalk should be redeveloped along similar lines to Gunwharf, but to a smaller scale.

Initial Council Response:

There is some support for development of this site with recognition of the potential for ongoing marine uses, though more concerns over residential development in this location. Further discussions are required with Premier Marinas and CBRE Global Investors to understand their aspirations. There are a number of significant constraints affecting the potential development which could be achieved on this site, not least of which is the issue of brent geese and waders. This requires further work with the HIWWT and other partners to understand the emerging evidence on the network of sites and determine a suitable way forward.

15. St James' Hospital and Langstone Campus Strategic Site

74 comments received on this topic.

Do you agree that Tipner should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?

Seven individuals were content with the identification of St James / Langstone as a strategic site as described in the consultation document. One thought it should be purchased by the Council and developed for affordable housing.

Other comments focussed on how the site might accommodate some development but with some or all of the following - provision of public transport links, recognition of access issues, retention of significant open spaces, protection of mature trees, delivery of large family homes, impact on public services and roads, and sufficient parking provision. The importance of north-south and east-west pedestrian and cycle routes was highlighted.

Some thought that development would not support the vitality of retail uses on Milton Road / Locksway Road.

A number of respondents stated they did not want to see St James and Langstone identified as a strategic site. One did not consider a housing only approach to be sustainable development. Others had different views on the potential of the two parts for development.

Three respondents considered the existing policies in the adopted plan, which allows for uses including education and healthcare, to be an appropriate approach.

The lack of existing employment opportunities was mentioned as well as flooding issues.

Ecological Value

Respondents thought increased development would lead to damage to wildlife. A number of respondents highlighted the use of the site by Brent Geese. The **HIWWT** note the playing fields within the St James' Hospital site have been identified as being part of the 'core network' of sites used by overwintering Waders and Brent Geese, and as such there is the potential for the proposals to have a significant adverse effect of the adjacent SPA. One resident noted the survey work was due to be complete in 2018.

The **RSPB** raised serious concerns regarding impacts on the designated features of the nearby wildlife sites from development in this location. The SSSI/SPA designation should be highlighted in the ongoing work and impacts appropriately assessed. The next stage of the emerging plan, should be accompanied by a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in the Habitat Regulations would need to be removed from the plan.

One respondent considered the disturbance upon the nearby sensitive ecological sites could not be managed by a cash payment. Doubts were raised about the availability or suitability of any other site to provide suitable mitigation of the impact further development of the University playing fields on sensitive ecological sites.

Others mentioned the potential impact upon the many mature trees on the site.

One respondent thought that St James and Langstone should not be considered as one strategic site.

Transport

Issues raised included traffic congestion, lack of capacity at key junctions, relatively poor public transport, and increased air pollution from more traffic.

Concerns were raised whether there existed capacity in the local road network to accommodate additional development in this area.

The existing travel patterns (out in the day, in at the evening), were noted, and concerns about the areas sustainability.

Air quality issues were also highlighted, at Milton Park School, and throughout the Milton Road, Eastney Road, Velder Ave. corridor.

Infrastructure

Milton Neighbourhood Planning Forum raised the following issues:

Local highway capacity, ecology (both on-site and nearby), the future of the Wind in the Willows nursery in the West Lodge, the loss of a green lung for the eastern side of the city/

They stated the site could only be developed for educational or sports uses and considered existing planning policy allows for a better mix of housing including education and healthcare. They noted the site should provide for sustainable transport - not "could" do, and highlight the existing travel patterns in the area, namely that traffic on the Eastern Rd heads north in the mornings returning south in the evenings, which demonstrates the shortage of good employment opportunities and the shortcomings of the Objectives in the "Issues & Options" document. They considered there is no evidence 250+ new houses replacing existing employment uses can be "Sustainable Development".

English Heritage welcomes the recognition of the grade II listed St James's Hospital and Hospital Chapel, and the identification of the protection of these buildings and their settings as an issue to be addressed through the Plan.

Sport England notes that the site is important for sport and contains significant amounts of playing field marked out as pitches for a range of sports. It also contains a number of Artificial Sports Pitches (AGPs). Sport England would object to any proposed site allocation which does not at least protect this playing field provision; existing sports facilities including any ancillary facilities (eg clubhouses), especially as given the assessment work in progress is identifying a need to protect facilities and playing fields.

Southern Water notes that additional local wastewater infrastructure will be required to accommodate development, and that there is existing wastewater infrastructure which will require an easement which may affect the site layout or diversion.

Other significant issues raised included concerns over the capacity of existing healthcare, schools and nurseries, the use of the existing sports fields by different groups, the quality of life brought by

having an open space and "green lung" in the city, and the lack of detail over the potential flooding risk in this area.

It was noted that the Issues and Options document and Sustainability Appraisal wrongly identifies Portsmouth Harbour Special Protection Area and Ramsar site.

Other uses

Some individuals suggested uses other than residential should be considered, notably healthcare (both in the existing listed St James building and elsewhere on the site) or a new school to meet current and future needs. Other uses suggested included using the whole site as a public park, other open space or retained/enhanced sports provision. a site for a relocated Portsmouth university a nursing home / supported housing, and a community facility, a museum / local gallery and a Sherlock Holmes museum or other uses suitable for the historic buildings. A Milton bypass through the site was suggested. One respondent suggested the reuse of the student housing as social housing.

The three main landowners (**Homes and Communities Agency**, the **NHS Property Services** and **the University of Portsmouth**) support the identification of the area as a strategic site. They consider this site is an available, deliverable previously developed site and is suitable for residential development. They have commissioned a team of consultants to prepare a Development Principles and Framework Document (the Framework) to coordinate delivery of development across the site and ensure that infrastructure and mitigation burdens are broadly equalised:

The Framework document is in preparation and is underpinned by a comprehensive environmental assessment process which has identified opportunities and constraints, and informed the emerging development parameters.

The Issues and Options document identifies a series of issues to be considered through the Plan making process.

Issue 1: The capacity of infrastructure, including roads, utilities, and community infrastructure such as schools and community facilities to support development in this location. Consultation with statutory consultees, the LPA and local community have taken place to identify and understand local infrastructure requirements. In addition, statutory consultee responses have been reviewed from the Further Proposed Site Allocations - July 2014. Development parameters will guide the form and location of development within the site and inform how development could be delivered to minimise any adverse impacts. This work includes a detailed assessment of highways, utilities and social infrastructure and capacity. Individual development proposal will then respond to specific infrastructure requirements via direct contribution or obligations within the context of the Framework.

Issue 2: Future provision of private open space which is currently accessed and used by local people and access to the waterfront . One of the key overarching principles of the proposed framework will be ensuring that the development creates a green and attractive environment for new and existing residents. This includes enhancing the mature landscape structure present across the site and allowing this to inform the location and form of develop opportunities. Trees and belts of planting can be incorporated into new public and or private spaces across the site. Access to existing open spaces across the site will be retained as part of the Framework principles.

Issue 3: Cycle and pedestrian links with the wider area and the deliverability of local highway improvements; the Framework will consider options for new east-west and north-south pedestrian and cycle routes. However operational access to Solent NHS facilities must be maintained and any public access in these areas must respect security requirements. The Framework will encourage on plot parking to meet standards to remove potential for any overspill to the adjacent area. The consultant team are undertaking a review of potential highways improvements available to the wider network to mitigate any potential future impacts. This could include, but not limited to, improved bus facilities, enhancement of the National Cycle Network Route 222 and other routes, and specific improvements to junctions around the surrounding site.

Issue 4: The need to ensure playing field provision. A number of open spaces for sport and recreation exist within the site including the Cricket pitch, St James Green and the University playing fields. These spaces serve a wide demographic of users including the local community, university students and staff of the institutions.

Issue 5: Any visual and ecological impact upon the coastline, including the sensitive Brent geese feeding sites. The Framework will include landscape principles to ensure that new buildings are sensitively sited within the mature landscape structure and planned to conceal or frame wider views to maximise and reinforce character areas. There is opportunity to enhance the character and value of existing areas of importance for wildlife through a considered ecological enhancement strategy. The potential for rewilding of the harbour edge, with improved integration between the harbour and Milton Common, will be explored via the Framework and should further enhance ecological provision within this valuable area.

Issue 6: Protection of the listed buildings and their setting (St James' Hospital and the adjoining chapel). The Framework will include a set of heritage principles and parameters to ensure that the heritage assets of the site are understood and respected. A particular area of interest and value is the main façade (south elevation) of the hospital structure which is architecturally picturesque in character and features high quality detailing. Retaining views and vistas towards this façade are important. Elsewhere, the hospital complex has been substantially altered by 20th and 21st century development, and as such some areas now contribute little to the understanding of the asset and its heritage value. These areas represent an opportunity for redevelopment, and the Framework will help to identify appropriate locations and forms of development.

Issue 7: Improvements to flood defences. Baseline environmental assessments have been undertaken to understand the basic drainage and flooding regime of the site to identify constraints to development. There will be opportunities to incorporate drainage features into the open spaces and the potential to also enhance biodiversity and these will be expressed via the landscape principles contained within the Framework.

Issue 8: Protection of viewpoints. See responses to Issue 5 and 6. The Framework will include strong place making and townscape principles; this will include retention and enhancement of key views, vistas and visual connections into and within the site.

Issue 9: A mixture of dwellings including a significant proportion of family housing. The site offers an opportunity to provide a range of house types, sizes and tenures and there are locations within the site that are able to provide large proportions of family housing. This will need to be balanced against site specific requirements for conversions or redevelopment of individual plots.

The **HCA** makes the following points about their land specifically. An outline planning application (OPA) is currently being prepared which proposes the removal of existing buildings and development of up to 115 dwellings and provision of public open space. The application is scheduled to be submitted in Autumn 2017 and given that the new Local Plan is in the early stages of consultation, the application is likely to be determined under the currently adopted development plan for Portsmouth City Council, with limited weight afforded to the emerging policies.

The HCA makes the following statements with regards to the issues set out in the consultation document -

Issue 1: The capacity of infrastructure, including roads, utilities, and community infrastructure such as schools and community facilities to support development in this location. Pre-application consultation with statutory consultees, the LPA and local community have taken place to identify and understand local infrastructure requirements and how the development proposal can help to minimise any adverse impacts and opportunities to deliver improvements. The OPA will be accompanied by an Environmental Report identifying how the proposals have been designed to respond to local infrastructure requirements.

Issue 2: Future provision of private open space which is currently accessed and used by local people and access to the waterfront. One of the key overarching principles of the proposed development is ensuring that the development creates a green and attractive environment for new and existing residents. The illustrative masterplan that will support the OPA shows a potential site layout including 1.32ha of public open space (including a Local Equipped Area for Play). In addition, the proposed design retains and enhances the existing green infrastructure, including retaining tree lines to create linear woodland walks.

Issue 3: Cycle and pedestrian links with the wider area and the deliverability of local highway improvements. The proposed development will contribute to creating north-south connections through the wider strategic site, which is one of the key access and movement principles of the Framework. The site will maintain the existing connections from Locksway Road. Wider site connectivity will be addressed via the development framework. Provision of vehicular and pedestrian links onto Locksway Road and Fair Oak Road, will ensure good connections with the adjacent bus stops and National Cycle Network Route 222.

Issue 4: The need to ensure playing field provision. There are no existing playing fields on the HCA Site. This issue will be addressed separately through the Framework and/or through a future application for the Langstone Campus site, rather than through the OPA for the HCA Site.

Issue 5: Any visual and ecological impact upon the coastline, including the sensitive Brent geese feeding sites. The HCA Site is isolated from the coastal environment and is not a Brent geese feeding site. Nonetheless, the Environmental Report is underpinned by a Phase 1 habitats assessment and Phase 2 species studies to inform the development proposals. The proposed development takes the opportunity to enhance the character and value of existing areas of importance for wildlife through a considered ecological enhancement strategy.

Issue 7: Protection of the listed buildings and their setting (St James' Hospital and the adjoining chapel). The grade II listed St James' Chapel is located to the north of the HCA site on adjacent land. A heritage impact assessment will accompany the planning application and the proposed development will seek to enhance the setting of the listed Chapel via specific landscape treatments south of Woodlands Walk.

Issue 8: Improvements to flood defences. A Flood Risk Assessment and drainage strategy will accompany the OPA. Opportunities to incorporate drainage features into the open space have been explored to also enhance biodiversity.

Issue 9: Protection of viewpoints. The retention of views of the St James' Chapel is one of the key design principles that has guided the development of the OPA masterplan.

Issue 10: A mixture of dwellings including a significant proportion of family housing. The proposed development will provide a range of house types, sizes and tenures, including 30% affordable housing in line with adopted PCC planning policy requirements. The illustrative masterplan proposes an indicative housing mix that would deliver a majority (58%) of 3 bed and 4 bed family houses thereby contributing to meeting the need for family housing provision.

In summary, the HCA strongly supports the inclusion of St James' Hospital and Langstone Campus as a strategic site allocation in the Local Plan, and considers that it is suitable to deliver residential development that will positively contribute to meeting the city's housing need, including affordable housing.

The **NHS Solent Trust** also owns and operates properties at Oakdean, The Orchards and Limes within the site identified in the issues and options document. It is the intention that these properties will remain operational for clinical purposes for the foreseeable future. Any future development of land at St James and Langstone Campus will need to accommodate the continued operation of these properties.

The University considers there are also other potential land use options, so recommend any policy is developed to be as flexible as possible.

In terms of the issues identified in the Issues and Option document, the University make the following comments about the Langstone Campus site.

Infrastructure Capacity: we acknowledge this is an important issue for the masterplan area. It is essential that appropriate regard is given to the overall cumulative impact such that future phases do not have to remedy any deficiencies that may have arisen following earlier phases. The findings of the Framework and Evidence Base should form the basis of any site-specific allocation to provide clear guidance on how infrastructure capacity can be phased and delivered. Any planning application in the allocation area should also be supported by an Assessment which identifies how future phases and cumulative considerations can be accommodated satisfactorily.

Open Space and Waterfront Access: the Framework will identify opportunities for the provision of Private Open Space in the masterplan and individual development areas and how this can be best taken forward. The campus site in particular offers an opportunity to improve waterfront access for the benefit of the existing and extended local community.

Cycle & Pedestrian Links: the Framework will identify opportunities for the delivery of links and how they can be introduced to improve linkage through the masterplan area and with the surrounding locality.

Playing Field Provision: the University's landholding includes existing playing fields used both by the University and wider community. The Framework has identified the retention of the playing fields given the pressure on open space provision in the City and the current role of the fields. There should however be sufficient flexibility in any future policy to allow for the development of the

playing field site in the event that a relocation and enhancement opportunity exists elsewhere in the city. The findings of the Open Space Evidence Base are an important element of any strategy and we would welcome the opportunity to comment further on this once it has been published.

Visual & Ecological Impact: the University site has important relationships with the Langstone Harbour to the east and is used by Brent geese. It is therefore acknowledged that any scheme which does proceed needs to ensure an appropriate visual and ecological impact. This is assessed further in the Framework.

Listed Buildings: there are no Listed Buildings on the University site.

Improvements to Flood Defences: there is no specific requirement for the University site to provide improvements to Flood Defences in isolation from the remainder of the masterplan area. Any improvement to this infrastructure component should be reviewed as part of the Framework and its associated Evidence Base.

Protection of Viewpoints: there are no specific defined views which need to be protected in the University site. The development of the site offers an important opportunity to enhance the visual character and built environment quality of this part of the City.

Mixture of Dwellings: The University in particular offers a key opportunity to deliver one and two bed apartment style units based on the site's existing density/ footprint and the potential to convert or replace taller buildings such as Barnard Tower.

NHS Property Services supports the identification of St James as a strategic site. It is the intention of NHSPS to dispose of its land for residential redevelopment to help meet housing needs and ensure the protection and enhancement of important historic assets that have great significance for the local community. The capital receipts and savings generated from the disposal of the property will enable investment in modern services and means of care for the NHS.

NHSPS agrees that this is a sustainable location for new housing. The historic hospital complex has suffered from the addition of utilitarian accretions over many years and NHSPS agrees that redevelopment provides an opportunity to remove unsightly buildings, and deliver new housing, associated parking and open space that enhance the important heritage assets and create a distinctive and successful place that complements the adjoining communities.

NHSPS does not disagree with the potential adverse effects identified in the Issues and Options document, but considerable environmental assessment work has been undertaken on behalf of the three principal landowners and confirms that the potential effects can and will be appropriately mitigated through careful design. Policy will need to be sufficiently flexible and not overly prescriptive if development of all parts of the Strategic Site are to be successfully implemented.

In particular, the capital receipts and revenue savings generated from the sale of sites and properties for “best value” is an important component in helping to provide funding for new or improved health services and facilities. Furthermore, the way in which care is delivered has changed and St James’ Hospital would require significant investment and updating to meet modern standards. The sale of St James’ Hospital is therefore essential to allow investment in modern service delivery and means of care. The conversion of the vast listed hospital building will be costly, but equally will deliver a very positive and beneficial development, restoring a historically important part of the city, protecting heritage assets and enhancing their settings. The key issue for NHSPS is

how to make that financially viable. This part of the proposed Strategic Site Allocation is highly unlikely to generate sufficient funds for wider infrastructure provision and policy must reflect on the realities of bringing sites of this nature back into long term use.

NHSPS therefore urges PCC to allow sufficient flexibility in the wording of policy to enable and facilitate the redevelopment of heritage assets.

The **Milton Neighbourhood Plan Forum** stated that the Milton Neighbourhood Area and Neighbourhood Forum were designated in July 2015. A draft Neighbourhood Plan has been prepared and should be ready for consultation later in 2017.

They considered there is only passing mention in the consultation document of Neighbourhood Plans. There is no recognition of the two-tier nature of statutory plan-making or of the role of Neighbourhood Plans in making site allocations.

There is no mention of the proposed site allocations in the draft Neighbourhood Plan. Milton Neighbourhood Forum has worked closely with Portsmouth City Council throughout the process, and continues to do so. The lack of mention of the proposed site allocations in the emerging Milton Neighbourhood Plan is therefore surprising and a matter for concern.

The Forum considered the St James' Hospital and Langstone Campus sites have a very different nature and constraints affecting them. The emerging neighbourhood plan proposes separate site allocations for the St James and Langstone sites.

The emerging Neighbourhood Plan has considered these sites in depth, and is supported by a range of evidence. The draft neighbourhood plan includes Special Policy Areas for the sites. These have been shared with the local planning authority previously. We would suggest that the Local Plan either build in these policies, or recognise that the Neighbourhood Plan will make the site allocations and put in place related policies.

The Forum makes the following points regarding the issues for this site:

Capacity of infrastructure, including roads, utilities, and community infrastructure such as schools, to support development in this location: there are already recognised capacity problems in making access to and from the island, especially at peak times. Further work is required by the local authority to assess the viability of development on the island. We would also highlight the air-quality issues arising from traffic congestion.

Any visual and ecological impact upon the coastline, including the sensitive Brent geese feeding sites: The development potential of the Langstone campus site is severely limited by the proximity to the protected coastal zone. A Brent Goose feeding site is within the Langstone campus site.

These factors are addressed by the proposed separate site allocations within the Neighbourhood Plan. This recognises the St James' Hospital site as being suitable for housing. We would emphasise the importance of retaining the existing educational use on the site and the need for new healthcare facilities. The inclusion of Langstone Campus part of the site for housing development is not supported. The Langstone site is proposed to be designated as Local Green Space and the remaining parts for educational, sports and community uses, subject to the sports pitches remaining as undeveloped recreational space.

Protection of the listed buildings and their setting (St James' Hospital and the adjoining chapel): We would also highlight the importance of the unlisted buildings that form part of the grouping with the listed buildings. The other issues identified in the consultation document must also be addressed.

In addition sustainable development is not just about maximising the development of housing, but about planning for balanced growth that includes employment and community facilities.

Allocating both the St James' Hospital and Langstone Campus sites as a single strategic site for housing would remove the capacity for employment and community facilities within the neighbourhood area, including education provision. This would be unsustainable and contrary to the NPPF.

The infrastructure and environmental considerations outlined above would also need to be considered within the context of the National Planning Policy Framework. Therefore it is clear that a completely different approach is required to the St James' Hospital site and the Langstone Campus site. In terms of housing need, the Milton Neighbourhood Area demonstrates a number of demographic challenges including a need for homes suitable for the elderly and those with disabilities and homes suitable for younger people.

In addition to the above, Cllr Dowling submitted a copy of the responses received to the consultation carried out in 2014 on the potential allocation of the land for development of up to 480 dwellings in total.

The responses to that consultation were considered by the Cabinet Member for Planning, Regeneration and Economic Development at the meeting of 2 December 2014. The main issues raised by residents were - sadness / anger at the potential loss of the St James's site; impact on wildlife; impacts of the development on infrastructure; calls for independent assessments of the infrastructure impacts; significant changes to the character of Milton; the driver of development being the maximisation of the receipt for the NHS; the desire for the land to be put to best use for local people. These resulted in respondents objecting to any development at all, or seek a reduced amount of development, or a form of development which could have fewer impacts, including social/care uses such as retirement homes or educational uses.

One respondent noted the high number of responses to the 2014 consultation exercise indicated the deep concerns within Milton.

Initial Council Response:

It should be recognised that this area has been the subject of a previous consultation in 2014 as part of the proposed site allocations process. The outcomes of that consultation were reported back to the Cabinet Member for Planning Regeneration and Economic Development in December 2014. Since then the major landowners have progressed a joint strategic framework which considers how development of the site may proceed to inform their individual planning applications. That work is still ongoing and the outcomes will inform the new Local Plan.

The Issues and Options consultation focused on potential residential development of the site. The response received from this consultation, including the response from the landowners, indicates that it is likely that a flexible approach is required and a range of uses should be considered for the site. Identified constraints, including the capacity of local transport networks, and the potential impact upon sensitive ecological sites and species, need further work before the capacity and potential uses of this strategic site can be confirmed. The best way to consider this is to assess the site as a whole, rather than individual parcels of land, and for that reason the technical work will continue on that basis, though recognising the different characteristics of the component parts.

The comments on behalf of Milton Neighbourhood Forum require careful consideration. There is clearly a need for both authorities to have a more joined up approach. Further discussions should be held to ensure that the available options and evidence is informing both the local plan and the Milton Neighbourhood Plan.

16. Lakeside Northharbour Strategic Site

40 comments received regarding this topic.

Do you agree that Lakeside should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?

The majority agreed that Lakeside should remain a strategic site for development (26 comments). Support mentioned the following attributes:

- The less restricted location off Portsea Island.
- Employment opportunity and the proximity of employment opportunities for surrounding residential area.
- Value and potential of the site for the development of high tech industry in Portsmouth.
- The site environment - greenery and open space.

Fareham Borough Council supports the continuation of Lakeside as a strategic site. They endorse the consistency with the PUSH Spatial Position Statement and the provision of a significant supply of high-quality office floorspace necessary to contribute to the sub-regional floorspace requirements.

Northwood (Lakeside) strongly supports the proposal to retain Lakeside as strategic site for employment development in the new Local Plan, and continue to hold the aspiration that Lakeside will remain an office-led campus of strategic importance within the region. The site has:

- Excellent transport connectivity;
- The capacity to deliver substantial employment floorspace, including tall buildings;
- A strategic location at the entrance to Portsmouth.
- The ability to significantly support the proposed Cosham Opportunity Area through local employment opportunities.

However, they disagree with the proposed allocation in terms of the quantity of office (B1) floorspace and types of uses for the site.

- Northwood consider the continuation of the existing site allocation at Lakeside does not reflect the changes that have occurred in the office market since the outline permission was granted (2010), or the current situation at Lakeside. They state that there is not sufficient demand to make office development viable and that this is not anticipated at any point soon given the quantum of existing stock available at Lakeside Campus. They report that there has been no tangible, quality large scale enquiries for offices of a sufficient size to kick-start the development of a new office area and large enquiries received can be accommodated within the currently available existing floorspace.
- Changes in workplace culture and technological advancements (remote/ flexible working, less physical storage space requirements) are said to have resulted in a reduction in their real estate footprint by as much as 20-30% in some cases. Modern business campuses now require supporting amenities to make them sustainable, provide an appealing environment to workers and compete with other centres/ parks. The Council should look to provide a combination of large and small offices for established and new

and young businesses, together with conference and meeting facilities and access to a range of on-site support services, retail and leisure offer and a vibrant public realm.

- This intensification of Lakeside and a wider mix of employment and supporting uses would accord with the principles of sustainable development and the optimisation of the use of land. Flexibility is key if Lakeside is to remain economically sustainable as companies change their office requirements, and remain seek to be socially sustainable as employees change their spatial working practices.
- For Portsmouth to be a credible office location there needs to be a good quality supply of in and out of town space. The Local Plan can help facilitate regeneration in Portsmouth city centre which would re-energise the office market, rather than rely on floorspace at Lakeside.

It is requested that:

- The site description acknowledges that nearly 50% of the PCS5 policy requirement for new office floorspace has been provided in the form of refurbished offices. Further accommodation will be released to the market in the coming months when IBM vacate Building 4000.
- The site plan is amended to correctly reflect the original outline planning permission for B1 office floorspace, which included the surface car parking to the north of the site.
- The new Local Plan reflect the principles of planning in the NPPF in having regard to market signals, providing social, economic and environmentally sustainable development, and not continuing the long-term protection of employment sites.

Other Key Issues:

- Do not lose what makes the site attractive (greenery and open space) for further development.
- Require high standards of design, layout and materials.
- Concern about environmental damage and disruption to wildlife.
- Traffic congestion at Hilsea roundabout.
- Congestion and access difficulties for Highbury residents.

Infrastructure

- Accessibility for workers and to the likely employment pool is key.
- Improve public transport links to the site; one respondent said they had to turn down a job at IBM due to the lack of convenient public transport links.
- Transport links in and out of Portsmouth would need to be improved.

Environment Agency note the recognition of the potentially significant flood risk on this site. Flood risk will also need to be managed through any further site specific flood risk assessments at planning application stage.

Southern Water state that additional local wastewater infrastructure would be required to accommodate the proposed development, involving making a connection to the local sewerage network at the nearest point of adequate capacity. Their assessment also reveals that there is

existing underground wastewater infrastructure within the site boundary that needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting. Southern Water therefore seek the following provisions in the site policy for Lakeside North Harbour:

- The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.
- Provision of future access to the existing wastewater infrastructure for maintenance and upsizing purposes.
- Suggestions for the future of the site:
 - Double or triple decked and use some of the existing surface parking area for new development instead of green space.
 - Impact assessment in conjunction with the future development of the city - especially impacts on local public services, roads, and traffic, with the necessary mitigation.

Alternative uses:

- Regional shopping mall to compete with Fareham, Havant and Chichester

Other comments

Nearby employment site Lynx House has a planning condition that states that should the building become vacant it would be demolished and returned to KG5 Playing Field - shouldn't this be adhered to?

Initial Council Response:

The reasonably broad consensus over the future use of Lakeside is welcome. The comments received from the site owners will be carefully considered and the implications for the new Local Plan addressed. It should be noted though that the current targets for employment floor space, based on estimates and plans for economic growth, are for a net increase in overall floorspace rather than a reuse of existing buildings.

There was concern that the diagram in the Issues and Options document indicated that the Council was allocating only a specific part of the site for employment uses. This is not the case - the planning approach to the whole of the Lakeside site is being reviewed in this new Local Plan.

Opportunity Areas

17. City Centre Opportunity Area

51 comments received regarding this topic.

What do you think about the future of the city centre? What are the issues we need to address and what do you think the Plan should try to achieve?

Mixed views on the future purpose, or suitability, of the city centre for further development.

Some feel it is the priority regeneration site for Portsmouth, in a highly sustainable location as key 'hub'. Others feel it is 'too late' and that its current condition should be accepted as an indication of the market and be allowed to turnover into other uses, with no further significant investment.

Issues for the Plan to address:

- Ambitious vision and implementation plan.
- Radical rethink of the city centre in partnership with the University of Portsmouth.
- An imaginative use of space.
- Consideration of new development in this centre in conjunction with the future of the city to include an impact assessment on local public services, roads and traffic with the necessary mitigation.

The mix of uses:

- Broaden the mix of uses - a mix of high quality retail, business, social space, cultural attractions, leisure (e.g. cinema and ice rink) facilities and residential.
- A focus around cultural and creative industries is key to the regeneration of the city centre - accompanied by mixed use development.
- A major entertainment complex on the former Tricorn site.
- Include residential uses; the centre should be a designated Strategic Housing area.
- Develop the northern end with mixed housing. The additional population would support existing retail and any new retail floorspace.
- Develop as a distinctive, enclosed residential area with a community centre in St Agatha's Church, to create a sense of place and a pedestrian crossing at Market Way.
- Keep the city centre primarily for retail supported by a strong cultural aspect. Only include a small amount of sustainable, high quality homes.
- Place restrictions on the quantity of student accommodation.
- Develop the Charlotte Street area into commercial and eating facilities.
- One comment suggested there may be more demand for mixing high rise residential with fast food and low end retail plus entertainment options.
- Unoccupied shops on Market Way roundabout should be demolished and the area used for new housing or offices.

Public Realm and Quality of Development

- Public realm work/investment to parallel provision in Gunwharf to make a joined up retail and leisure offer in the city. A more pleasant environment to match popular centres elsewhere.
- Less use of the paved area.
- Improve the quality of eating facilities on Commercial Road.
- Improve and upgrade Guildhall Walk and enhance the Guildhall area back to its original civic status.
- Provide council services in the local hubs to lessen the impact on Guildhall Square.
- Provide dedicated facilities for tackling homelessness and drug abuse. E.g. convert vacant commercial properties into temporary accommodation for the homeless.
- Improve the standards and quality of new homes.
- Improve the image of Landport area; relocate job centre, tackle homelessness, take advantage of the links to the M275. Improve standards and quality of new homes.
- **Historic England** wish to see the conservation and enhancement of heritage assets and of the public realm. The addressing of any assets at risk of neglect, decay or other threats.

Retail Issues:

- Consolidate unused retail space or improve existing offer before, or instead of, creating additional. Additional empty shops would not improve the centre.
- Aim to improve retail sales and attract quality retailers.
- Focus on the primary retail area where large stores are leaving (M&S, Matalan).
- Find out what the real issues are that prevent Commercial Road from thriving. Are the rent costs too high or the population too poor/ small to sustain a retail centre?
- Any new retail floorspace must be covered mall to be more appealing in all weathers and strengthen the ability to tackle cleanliness and overnight occupation.
- Alternatively - look beyond 'the mall' style attractions of the past. What will be popular in the future?
- Understand the changing face of retail: city centre uses should be reconsidered with reference to emerging patterns of retail and business activity; all forms of retail outlets are declining not just high streets. New or additional purposes need to be considered for retail spaces, although sector trends should continue to be monitored.
- Currently no evening activity: Cascades closed its food hall and there is no year-round late night shopping.

Employment/ Economic issues:

- Attract big businesses to the city centre.
- Define the need for office space prior to actually developing. Understand the development needs arising from the additional student accommodation in the city centre. Look at footfall, the evening economy and lack of food/leisure offer in the city centre once the shops close - diversify the offer.
- Offices should be encouraged above shops to keep people in the city centre and improve lunchtime trade and footfall.
- Station Street as an office area/ commercial focus. Including high quality public realm and mix of uses to avoid dominance by student accommodation.

Gosport Borough Council note that their Borough is an important source of workers, shoppers and visitors to the Portsmouth City Centre Opportunity Area. The recent regeneration of the Hard is welcomed, as would any further developments that improve the appearance of the area. Any proposals that create employment opportunities, including high quality office, accommodation are supported.

Northwood (Lakeside): The delivery of new offices through refurbishment could create opportunities within the city centre for regeneration as well improvements to the local economy. They make the following suggestions:

- Make attracting a major office occupier into the city centre a key objective to generate more economic activity for Portsmouth.
- A coordinated approach to delivering projects and/or services to regenerate city centre, for example through a Business Improvement District (BID).
- Consider the role of the university in creating activity and vitality, in addition to improved retailing.
- Encourage high quality Build to Rent residential development.

They state that while Lakeside Campus will remain an office destination, other uses must also be considered to ensure that it remains viable and sustainable for the future. They consider that distributing an element of the office allocation from Lakeside to allow other uses will benefit both the future of Lakeside and the regeneration of the city centre.

Portsmouth's Tackling Poverty Strategy Steering Group note that the city centre is located in Charles Dickens Ward, the area of Portsmouth with the highest levels of deprivation. In view of this the Local Plan must:

- Balance development needs with inclusive growth.
- Ensure new development considers the needs of the local community to reduce social exclusion and mitigate the risk of community tensions.
- Development and investment plans identify and meet the needs of local residents, not only those with higher levels of disposable income (such as students and tourists).

Transport/ Connectivity issues:

- Parking and access issues. E.g. consider underground parking.
- Use existing empty space for major road reorganisation - to be integrated with improved public transport hubs.
- Pedestrian/cycle link between the Guildhall (city centre) and the Northern Quarter.
- Links between the city centre, Gunwharf and Southsea to encourage shoppers to go from one to the other with different retail offer at each.
- **Portsmouth Cycle Forum:** the city centre boundary covers a large area which looks and feels different and disconnected. To join up, make Queen Street a more welcoming and continuous environment to linger, walk and cycle along. Areas close to the city centre do not feel part of it or connected to it. Buckland is cut off by Lake Road traffic - the subway crossing is a single, narrow alleyway between blocks of flats.
- Ban cycling in the pedestrianised areas.
- Make the city centre predominately a walking and cycling district.
- Utilise proximity and links to Somerstown.

Southern Water cannot provide a capacity assessment at this stage without specific housing numbers. However, if redevelopment proposals can demonstrate that flows to the sewerage network will be no greater than the current input by existing development, then infrastructure capacity may not be an issue in principle, subject to further assessments when housing numbers are quantified and when proposals come forward.

City Centre Landowners / Stakeholder Views:

The University of Portsmouth supports the identification of the city centre as an Opportunity Area. The city centre has significant capacity to accommodate growth across a range of land uses which in turn can deliver a wide range of social, economic and environmental benefits, of which the University Quarter can play a very important role. The University Quarter is mainly with the University's ownership/ control. There is an investment and development programme for significant transformative change as part of their University Masterplan, considered to be deliverable in the next 10-12 years.

It is requested that the Local Plan:

- Gives the University Quarter policy recognition and priority in the Plan.
- Amends the Opportunity Area boundary to include the whole of the University Quarter.
- Identifies the University Quarter as an additional Potential Strategic Site.
- Reviews the City Centre Masterplan (2013) to take into account the University's Masterplan, to ensure the latter has policy support.

The role of a University and the important contribution it can make to positive change and growth is recognised in Development Plans in other parts of the country. Examples of planning policies from a range of university cities are provided in the University of Portsmouth full response.

Railways Pension Fund (city centre land owner) supports the principle of the Portsmouth City Centre Opportunity Area and Strategic Site designation for the Northern Quarter and recognises the role that the Cascades Shopping Centre has within these designations.

They request:

- Comprehensive approach to the planning of the strategic site with the rest of the city centre, including the relationship with Cascades Shopping Centre.
- Flexible policy approach that allows for suitable elements to be brought forward on an individual basis. This would allow for a phased approach which underpins and enhances the existing retail and other offers and 'sign posts' further potential.

They note that the proposed allocation retains the existing city centre boundary that encompasses Gunwharf Quays. It is requested that the Plan recognises that the retail core of the city centre is focused on the Cascades Shopping Centre with the Northern Quarter Strategic Site as the principal regeneration initiative. Currently the Opportunity Area does not sufficiently recognise the priorities for the separate sites or distinguish between them.

Railways Pension Fund suggest a specific policy requiring applications for planning permission involving more than 200 sqm of retail or leisure floorspace within the city centre, but outside of a defined core retail area (to include Cascades) as identified on a proposals map. This would require

an application for additional retail or leisure floorspace at Gunwharf Quays to be fully justified. Furthermore, they recommend that the role of Gunwharf Quays in the city centre is further distinguished by requiring all new Class A1 retail floorspace at Gunwharf Quays to be limited to designer outlet operations, and be required to identify the range and type of goods permitted to be sold.

Centros Portsmouth Limited Partnership (city centre land owner): The Plan's aspiration for northern end of the city centre, or its proposed policy status, isn't clear. The details for the City Centre Opportunity Area don't describe what sets the 'Potential Strategic Site' apart from the rest of the centre. They also note that the boundary shown on the "Opportunity Area 1 Portsmouth City Centre" plan differs from the adopted city centre boundary, as additional land is included. They query the rationale for this.

Centros agree that the identified need for new retail floorspace should be focused in the city centre, and in particular on the City Centre Potential Strategic Site. They request that this is formally identified in the Plan. They would wish to see Gunwharf Quays and the core 'city centre' maintain their separate roles so not to jeopardise the prospects for regeneration of the City Centre Potential Strategic Site.

The Local Plan should ensure clarity regarding the definition and reference to the city centre and the sub sites (Gunwharf Quays/ Commercial Road/ Strategic Site) in order to ensure new development is directed to the intended locations. Further detail is needed on the vision for City Centre Strategic Site and the proposed new road layout and environmental improvements said to be critical to its redevelopment.

RPMI Railpen (owners of the Cascades Shopping Centre) are keen to ensure that the emerging Local Plan recognises the importance and role of the existing shopping centre alongside the appropriate level of ambition for growth and regeneration. The recognition of the need for regeneration of the city centre is welcomed with the acknowledgement that coordinated investment is required to prevent the city centre falling further down the retail rankings.

They are supportive in principal of the proposed Opportunity Area and Potential Strategic Site. They would wish to see inclusion and/ or clarity for the following:

- Continued Plan support for the on-going management and enhancement of key existing assets in the heart of the city centre, including Cascades Shopping Centre.
- The specific development aspirations for the Potential Strategic Site, particularly how it is set apart from the wider City Centre Opportunity Area and its proposed integration with key sites such as Cascade Shopping Centre.
- The allocation of forecast retail floorspace needs located to the Potential Strategic Site and key adjacent sites on Commercial Road (such as Cascades Shopping Centre), as opposed to other city centre locations, to enable the key regeneration aspirations of the city centre to be realised.
- Consideration of the proposed road re-routing in the context of their land holding, and the land owned by Delancey immediately north, whose sites are likely to be redeveloped as a first phase of regeneration of the core retail area.

Landsec (Gunwharf Quays) are supportive of the potential strategic allocation and recommend that the City Centre Opportunity Area has its own suite of policies to set out the development

framework and range of land uses for the city centre. Landsec would also support the need for a refreshed masterplan for the city in partnership with key stakeholders, such as themselves.

They request that a further Strategic Site is identified for the southern and south-western parts of the Opportunity Area, covering Gunwharf Quays as a focal point within a potential redevelopment area (for a mixture of residential, employment, retail, leisure, education, entertainment and sporting uses). This would provide an enhanced route between the waterfront and other parts of the city centre, particularly pedestrian and cycle connectivity routes between the north-eastern part of the city centre and the waterfront area (including Gunwharf Quays). They suggest the following planning principles for this allocation:

- Gunwharf Quays as the preferred location for town centre uses, with support for additional retail, leisure food & beverage, hotel and entertainment uses.
- Continued support for the development of the Hard as a vibrant waterfront destination with improved public realm and access and linkages to Gunwharf Quays and the railway station.
- Improved railway station and ferry terminal area, in order to improve the attractiveness and operation of these transport links with introduction of additional town centre uses where appropriate.
- Recognise that the HMS Temeraire area sporting facility is not an efficient use of land in a city centre location. If alternative suitable replacement provision can be made, then this area represents a key intensification opportunity for mixed use development which provides an important pedestrian and cycle connectivity link between the waterfront, historic dockland and Gunwharf Quays and other parts of the city centre, and could accommodate potential land uses including housing, employment, education, sporting, leisure and retail.

Sainsbury's Supermarkets Ltd owns and operates a store within the area identified for the Potential Strategic Site. In principle, Sainsbury's supports the identification of the northern part of the city centre as a Potential Strategic Site for mixed use development. However, in line with para. 173 of the NPPF, they would encourage the Council to ensure, at every stage of the Plan's development, that proposals are realistic, viable and deliverable - in the context of an understanding of local economic conditions and market realities.

Any redevelopment/ regeneration proposals should have regard to the need to retain food retailer in the area. As a major landowner, they request to be kept fully informed at all stages. They highlight that Plans which do not respect landowner requirements are unlikely to be deliverable and would therefore fail the tests set out in the Framework.

Other comments:

- Focus efforts on making Gunwharf the significant regional shopping centre instead of Commercial Road.
- Traditional highstreets unsustainable in the long term.
- It was questioned whether the idea of a city centre, as opposed to just a series of centres or use clusters, is still relevant in the 21st Century.

Initial Council Response:

The challenges facing the city centre are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The Portsmouth Retail Study set out evidence on the need for retail floorspace across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road. This work will be informed by the representations made by the main landowners submitted to this consultation but further engagement will be necessary.

The University masterplan needs to be considered given its potential to contribute towards the wider regeneration of the city.

18. Cosham Opportunity Area

22 comments received regarding this topic.

What do you think about development in the Cosham area? Are there any specific sites we should consider or specific issues we need to address?

4 respondents (including **Northwood Investors International Ltd (Lakeside)**) directly supported Cosham as a good location for further development. One respondent didn't think the area was capable of supporting further development.

Most respondents made comments on specific aspects of the area as below:

Opportunity Area:

- Northwood Investors International Ltd (Lakeside) suggests that the Opportunity Area is extended around the train station - it would benefit from public realm improvements and would promote sustainable transport.
- One respondent disagrees that there isn't further potential on Cosham High Street - seek to improve the quality and diversity of the retail offer.
- Extend the Opportunity Area south of the railway line to include Roebuck House and Lynx House.
- Proximity to QA Hospital should be reflected in the development of the area; its future growth needs, signage from the train station.
- Overdue for redevelopment.

Future Growth:

- High quality development and public realm - focus on character and on-going maintenance.
- Create mixed, sustainable communities.
- Build links between the existing communities and facilities in Cosham, Wymering and Paulsgrove.
- Impact assessment of development needed in conjunction with the growth of the city.

Housing and Employment

- Increasing the population of Cosham could provide a valuable employee and community base for businesses and supporting uses located at Lakeside (**Northwood Investors International Ltd (Lakeside)**).
- Balance of residential and employment provision.
- Create a separate area away from the high street for employment, residential and commercial facilities.
- Retain employment opportunities.
- Position affordable housing in the area.
- Old Roebuck house building could be created into social housing.

Community Facilities

- Strengthen as a community.

- Retain community facilities.
- Do not identify the police station and fire station as potential development sites.
- Look to retain services of the PCMI in Cosham, even if relocated.
- Consider where a new health and community centre would be located.

Traffic, transport and parking

- Address High street traffic congestion from the railway crossing.
- Improve public transport facilities.
- Reduce parking fees to encourage shoppers.
- Focus on walking and cycling connection.

Retail

- Balance and improve the retail offer, moving away from betting / charity shops - consider local produce markets.
- Encourage small retailers and cafes.

Other comments

Are the range of Opportunity Areas to replace city centre provision or are the proposals just improvements?

One respondent felt that Cosham has fewer identified opportunities and attention than other areas in the document.

Initial Council Response:

The responses indicate that the centre of Cosham is an area which is broadly considered to be suitable for new investment and development. The boundaries of the opportunity area will be revisited to ensure they are appropriate and we are actively considering the full potential. Further work on considering the approach to retail provision in this centre will also be undertaken, along with an assessment of individual sites in the Housing and Economic Land Availability Assessment.

19. North End Opportunity Area

31 comments received regarding this topic.

What do you think about development in the North End area? Are there any specific sites we should consider or specific issues we need to address?

There was some indirect support for making North End an Opportunity Area in the sense that it is overdue for investment and environmental improvements.

They were a few objections. One respondent felt the area is too constrained for significant additional development and another didn't think North End should be a priority.

Others stated that key constraints must be addressed first before additional development.

Key Issues to Address

- Levels of crime.
- Measures to reduce congestion and address poor air quality.
- Lack of green infrastructure.
- Upgrade of public transport, walking and cycling infrastructure
- Need for an impact assessment in conjunction with the future growth of the city.

Suggested Uses in the Opportunity Area:

A focus on residential and commercial uses, including suggestions for:

- Improvements to North End and Fratton shopping areas.
- An additional supermarket or more small, independent food retailers.
- Running promotions to fill vacant units and allow changes of use.
- Providing assurances to businesses that the area is a priority for investment.
- Preventing residential development on the frontages of Kingston Crescent or London Road.

Alternatively, concentrate retail in Commercial Road and replace vacant retail with needed green space (**Portsmouth Labour Party**).

Portsmouth's Tackling Poverty Strategy Steering Group want to see new development focus on maintaining and improving access to local facilities and to green spaces, as well as avoiding concentrations of businesses that pose risk to health and well-being.

One development opportunity was put forward: the long vacant former Kwik Save in Stubbington Avenue.

Traffic, Transport and Congestion Suggestions

- Improve public transport provision and link employment sites such as Anchorage Park.
- The Fratton-North End north-south corridor could be utilised for future public transport schemes e.g. Rapid Bus Route.

- Pedestrianise Stubbington Avenue/ Gladys Avenue roundabout to Kingston Crescent, at least during core hours.
- Turn London Road into a Pedestrian Priority Area or public transport only zone - particularly to the south of Stubbington and Gladys Avenues and Angerstein Road.
- **Portsmouth Cycle Forum** suggest rerouting traffic off London Road for a cleaner, safer environment (e.g. off Kingston Crescent and Derby Road, around the back of the new Lidl store).

Other Comments

- The existing library is said to be very successful.
- Don't neglect the older areas of Portsmouth; encourage a sense of pride and belonging.

Initial Council Response:

The responses indicate that this area is suitable for new investment and development but the comments regarding capacity, and air quality, are noted. Further work on considering the approach to retail provision in this centre will also be undertaken, along with an assessment of individual sites in the Housing and Economic Land Availability Assessment. The forthcoming Air Quality impact study will be relevant in helping to understand the future impacts and possible actions.

20. Fratton Opportunity Area

23 comments received regarding this topic.

What do you think about development in the Fratton area? Are there any specific sites we should consider or specific issues we need to address?

Most responses focused on specific aspects of the Opportunity Area for improvement.

A few didn't feel that the centre is suitable for significant further development as its too physically constrained, or that the area doesn't need to be a priority - partly due to its proximity to Commercial Road.

Key issues to address:

- Poor, bleak environment.
- Over concentrations of particular commercial uses.
- Poor air quality and traffic congestion.
- Need for an impact assessment in conjunction with the future growth of the city.

Portsmouth's Tackling Poverty Strategy Steering Group want to see new development focus on maintaining and improving access to local facilities and to green spaces as well as avoiding concentrations of businesses that pose risk to health and well-being.

Opportunity Area Uses

No residential development on the frontage of Fratton Road.

It is recommended that the Council seek to understand what type of businesses are attracted to the area and work in partnership with Big Fratton Local on the priorities for development.

Portsmouth Football Club

- Relocate to reduce traffic congestion issues (2 comments) and utilise site for social housing.

Asda and the Bridge Centre

- Increase the amount and range of retail uses.
- Focus on local amenities.
- Unattractive, poor quality centre that replaced the original Old Coop and Methodist building - design quality needs to be higher in future.
- Site has potential to add vibrancy to the area if its frontage can be improved.

Traffic, Transport and Congestion

- New development would need sufficient parking.
- Pedestrianisation or pedestrian priority between Arundel Street and Fratton Bridge and reroute traffic.

- Cycling and Walking infrastructure needs upgrading including connectivity to Fratton station.
- Remove through-traffic between Fratton Bridge and Arundel Street by a physical barrier at Selborne Terrace - allow bus access via automatic bollards.

Other comments:

- Encourage a sense of pride and belonging; don't neglect the older areas of Portsmouth.

Initial Council Response:

The responses indicate that this area is suitable for new investment and development but the comments regarding capacity, and air quality are noted. Further work on considering the approach to retail provision in this centre will also be undertaken, along with an assessment of individual sites in the Housing and Economic Land Availability Assessment. The forthcoming Air Quality impact study will be relevant in helping to understand the future impacts and possible actions. Further discussion needs to take place with parties including the football club on the future of this area.

21. Somerstown Opportunity Area

17 comments received regarding this topic.

What do you think about development in the Somertown area? Are there any specific sites we should consider or specific issues we need to address?

There were no objections to focusing additional new development in Somertown. Comments focused on the issues and suggested uses for the area.

Key issues to address:

- Crime levels and the fear/ perceptions of crime.
- The quality of the existing housing.
- Engagement with the local community.
- Community cohesion: **Portsmouth's Tackling Poverty Strategy Steering Group** notes the contrast between scale of new student accommodation and the local redevelopment undertaken to date; new development must benefit all members of the community.
- Need for an impact assessment in conjunction with the future growth of the city.

Walking and cycling connectivity:

- Build upon the close proximity to the city centre.
- Safe and appealing walking and cycling routes. Improve walking and cycling navigability through the area and wider connectivity to the city centre and Southsea (Portsmouth Cycle Forum).
- Improve walking and cycling connectivity along Winston Churchill Avenue and it's north-south connecting routes.

Opportunity Area uses:

- Focus on supporting the University's requirements (2 comments).
- Social housing provision.
- Improvements to existing housing.
- Increased greenspace provision with new development.
- There was a positive comment regarding the Somerstown Community Hub - they would like to see residential upgrades continued in this manner.

Development Opportunities:

- Better use of the Listed Omega Building - increased community and education uses.
- One respondent suggested the relocation of the fire station.

Other comments:

- Encourage a sense of pride and belonging; don't neglect the older areas of Portsmouth.

Initial Council Response:

The responses indicate that this area is suitable for new investment and development but the comments , including those regarding student accommodation and improving cycling and pedestrian links are noted. An assessment of individual sites will be undertaken in the Housing and Economic Land Availability Assessment.

22. Seafront Opportunity Area

81 comments received regarding this topic.

What do you think about the future of the seafront? What are the issues we need to address and what do you think the Plan should try to achieve?

Several responses noted the high value of the seafront and surrounding open space as an asset for residents, visitors and wildlife (including health and well-being benefits). It should be reflected as a priority for investment accordingly.

Views were split on the nature, size and scale of development in the identified Seafront Opportunity Area; some felt it is in need of regeneration and more should be done to promote/ enhance the seafront and Portsmouth's tourism industry through high quality new development. Others feel the priority should be to protect the natural environment and its existing character, which would be negatively impacted by additional or 'too much' development.

In terms of existing development, some respondents feel new development has been contrary to the goals of the Council's Seafront Strategy (2013). However positive comments were also received on recent development including: Hot Walls, Southsea Castle, the garden centre on Ave de Caen, Canteen and pier redevelopment.

Other views on development principles included:

- Prioritising the marketing the significant historic and conservation assets.
- Prioritising brownfield sites over greenfield land.
- Make a destination for supporting seasonal businesses.
- Environmentally sensitive development - retaining its 'open' character.
- Ensuring high quality design - sensitive to Southsea's existing architecture.
- Investment in making the seafront a major attraction - e.g. take over and upgrade the piers.
- Not considering this opportunity area for development until all other sites have been completed.
- Work in partnership with all relevant agencies (including sea defence bodies).
- Need for an impact assessment in conjunction with the future growth of the city.

Detailed comments were received on sea defence, transport and biodiversity issues:

Sea defences

A significant issue for a number of respondents in the consultation, many of the comments related to their design with respondents highlighting that more detail was desired on their design, and that the flood defences are unpopular as they remove the seafront view and the Common itself. Others felt that they need to be robust but in keeping with the historic environment, whilst also attractive to tourists. Furthermore:

- Seafront defences should be incorporated into the seafront masterplan.
- Protection against floods should be reasonable and proportionate to the likelihood of flood risk.
- Alternative 'soft engineering' solutions should be fully investigated.

- Incorporation of sustainable travel modes. Defence design should include a mixture of pedestrian/cycle routes to be used as an opportunity for increasing active travel along the seafront.

Transport

- Improve the connectivity of the seafront with the wider city to allow all residents to benefit from the coastal space.
- Encourage more sustainable travel around/to the seafront.
- Better walking and cycling routes from the city centre, Gunwharf, Central Southsea, the Eastern Road and the train stations to Eastney beach.
- Infrastructure to encourage active travel will cost much less to maintain than other methods of public transport.
- High quality cycle infrastructure should be put in along the length of the seafront.
- Should try to limit the amount of additional cars from tourists.
- No capacity to accommodate any new development to the east of the area.
- Southsea parking limitations.
- Make it safer to use the Hayling Ferry, both on foot and for cycling, by enforcing the 20mph limit (or using suitable traffic calming methods).
- New cycle lanes are dangerous and should be removed.
- The roads infrastructure is detrimental to the local environment and wildlife.

Biodiversity/ Natural environment

A few respondents raised concerns regarding the natural environment and biodiversity of the seafront area. **Hampshire & Isle of Wight Wildlife Trust** made the following points:

- The seafront is an important area for recreation and wildlife.
- Several sites along the seafront are included as part of the core/primary network for overwintering waders and brent geese and the sea defences support the only regular overwintering flock of purple sandpiper *Calidris maritima* in the county. Eastney Beach and the coastal vegetated shingle habitats present are of international importance and Dartford warbler and black redstart are known to breed at Eastney and around the former QinetiQ Fraser battery site.
- Any proposals should be developed in conjunction with mitigation and management strategies which are informed by robust ecological information.
- Proposals should look to protect and enhance the natural environment delivering net gains in biodiversity, where possible.
- Any proposals should look to provide long term recreation and SINC management strategies.

The **RSPB** also made several points:

- Given the proximity of the Opportunity Area to Langstone Harbour SPA / SSSI in the east and several important areas of supporting SPA habitat providing Brent Geese feeding habitat we have serious concerns regarding impacts on the designated features of the adjacent wildlife sites from possible developments in this area.
- The significance of Langstone Harbour SSSI/SPA designation and its supporting habitats needs to be acknowledged and impacts appropriately assessed.

- Appropriate screening of the Qinetiq site as part of the Habitats Regulation Screening Assessment and the need for further assessment must be recognised in the Local Plan.
- At the next stage of the emerging plan, we would anticipate a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in the Habitat Regulations would need to be removed from the plan.

One member of the public suggested extending the promenade to Eastney Point to include the natural environment and the setting of Fort Cumberland. Two respondents suggested that the seafront should be considered as an essential 'blue lung' for the city.

Opportunity Area

- It is important to maintain the distinctive characters and identities of each area so that the city is legible.
- The city centre with the Harbour Waterfront should not be grouped together as they have very different economic functions. Remove Portsea from the city centre boundary and re-define as part of the 'Harbour Waterfront' area together with the Historic Dockyard and Gunwharf Quays.
- The Wightlink Ferry terminal, BAR Racing, the old fishing harbour and the seafront down to Clarence Pier form a natural grouping.

Opportunity Area Uses

A summary of uses suggested:

- Retain the approach in the existing Seafront Strategy (2013).
- The Common should be utilised for events and needs more toilets to support it.
- More community space and provision for local people.
- Provision for more cafes, bars, shops and stalls, leisure venues, venues promoting exercise, more to attract families.
- More facilities are needed at the eastern end of the seafront.
- That the area is unsuitable for any residential development.

Barton Willmore believe that the seafront presents the opportunity to reshape Portsmouth's image. The area should be more fully utilised for tourism, hotels and sports facilities. To achieve the vision for the city, Portsmouth should develop linked tourism activities along the seafront with new places to live, work or visit, in combination with selective redevelopment and regeneration.

Specific Sites

The Plan shouldn't focus on particular named sites for housing in this area; add 'plus other sites' in the text.

A couple of responses related to South Parade Pier and reflected similar desires for new uses as above, including more restaurants/bars, and future development that aspires to create a diverse seafront that is not only arcades and low quality food establishments but has more, high quality commercial and food/drink uses.

A few requests for the removal or redevelopment of the Pyramids Leisure Centre site, as either an improved facility, luxury hotel or an open air lido.

Protect Eastney beach as a nature reserve; refuse any further commercial development.

Several comments were received regarding the Fort Cumberland site and surroundings, and the need for affording it greater protection and enhancement. Suggestions included:

- Protect and develop as a heritage tourism attraction. One respondent suggested that the Royal Armouries could be re-sited here also.
- Open up its main frontage by the demolition of the QinetiQ Trials Site.
- Reopen the original entrance and expand to encompass the SINC adjoining it, in order to conserve/enhance the historic environment and heritage assets of the area.

Fraser Range and Eastney Caravan Park and adjacent SINC

The Issues and Options consultation process itself was the subject of a few comments. One respondent expressed dissatisfaction because they felt that the consultation was misleading. Two other members of the public were dissatisfied because the consultation did not directly address the details of any proposed housing development at Fraser Range or the caravan park and that such plans are not obvious on the website and at the exhibitions. It was felt work needs to be done to ensure local residents' views are considered.

Objections to new development

31 respondents voiced objections to, or concerns about, any potential development proposals for the Fraser Range site, Caravan Park and car park adjacent to the SINC - specifically a reported proposal for 300 dwellings. The most common objections were on the following basis:

- Conflict with the principles of the Seafront Masterplan SPD (2013).
- Perceived existing lack of services, facilities or infrastructure capacity impeding its capability of accommodating any new development (including sewerage, schools, roads, health services and shops) with more vehicles associated with new development adding to current congestion issues.
- New development disturbing contaminated land in the area (pollutants including heavy metals and asbestos).
- Coastal and surface flood risk, partly as a result of the increase in impermeable land from new development.
- Negative impacts of development on the Fort Cumberland Scheduled Monument.
- Loss of the caravan park; a valued low-cost tourism facility.
- Negative implications for the natural environment, biodiversity and protected species including:
 - Permanent loss of open green space that is already limited (and its well-being benefits).
 - Impacts upon bird migration routes and upon protected species such as Dartford Warbler, bats in derelict buildings and other flora/fauna.
 - Environmental impacts from additional vehicles inc. air pollution.
 - Impacts on designated areas including the SINC and nearby RAMSAR and SSSI sites.
 - Compromised access to the seafront as a 'blue lung'.

Other comments included:

- Housing or large development in this location is inappropriate and inconsistent with sustainable development principles.
- Overcrowding in the city from additional homes, increases in anti-social behaviour and other negative social problems.
- Any new housing built in the area would outprice those who need housing most.
- Impacts on the views from existing homes.
- Conflict with the Council's duty to provide and protect recreational and specified areas for the residents and visitors and to protect open space important for community health and well-being, education and biodiversity.
- Doubt over whether the HRA recommendations would protect wildlife, particularly in the SINC.
- Financial implications of land remediation and CIL requirements. Should consider sites that are more affordable to develop and more appropriate for potential residents, especially off the island.
- The SINC/car park are used daily by a variety of people.
- Loss / relocation of the nudist beach.
- Consultation is needed with organisations such as the RSPB, about the level and nature of development that could be achieved while sustaining the habitat.

The Plan should look at maintaining and enhancing public transport in the area (which was felt to be limited in some areas) and reduce its impact upon the environment. It was noted that there are issues on local roads with blind spots, speeding and parking in the local area, particularly Eastern Road, Bransbury Road, Henderson Road and Fort Cumberland Road. Cycling along Fort Cumberland Road can also be treacherous.

Alternatively, a number of responses made suggestions for uses for the area:

- Green space - returned to a natural setting/ redevelop as a nature reserve. Would also enhance the setting of Fort Cumberland.
- A focus on health and wellbeing, education, the creation of business or creative workspaces.
- Limit to affordable or semi/detached housing.
- Mixed use scheme with high quality designs and additional family homes.
- Mixed residential and hotel site.
- Office facilities in combination with a small solar farm.
- Luxury flats with sympathetic grounds to improve the area.
- A public park with the car park retained.
- Future development of the Caravan Park should be restricted to low rise.
- Residential amenity of Centurion Gate should be protected and/or enhanced by any new development.
- Development should be environmentally sustainable.

One individual responded to say that they welcomed development/ thoughtful investment because the site is currently poor quality and dangerous, impacting negatively on the wider area. Five respondents suggested that Fraser Range should be a strategic site in the plan but not necessarily for housing primarily, but that the area was in need of better transport links to encourage new development.

Other Comments

- New housing should be located off the island or at the northern end of the city, where there is easy access to major trunk and motorway routes in/out of the city.
- Consider the impacts of new and permitted student housing on freeing up private housing on the housing needs of the city.
- Council should work with community, wildlife and cultural bodies to protect the coastal area.
- The quality of the housing in Eastney is poor. Potential for small scale new housing in the Henderson Road area.
- Eight respondents felt the Council should resist the housing targets being imposed on them by the government as they are not feasible for the city.
- The seafront masterplan should focus on ensuring that existing wildlife habitats, housing and businesses are protected from over-urbanisation.

Initial Council Response:

Responses to this broad area covered a wide range of issues, reflecting in part the differing nature of various areas.

The comments regarding the ability of the seafront to be a stage for social, cultural and recreational events and activities are noted. One key consideration for the Plan going forward is to ensure that this is reinforced and enhanced in the future while retaining important qualities, including the character and nature conservation value of the area.

The ecological value of the seafront and neighbouring areas will need to be recognised and responded to in the new Local Plan. Work on green infrastructure, the Sustainability Appraisal and the Habitats Regulations Assessment will need to address this.

Fraser Range and the Caravan Park were not the specific subject of consultation in the Issues and Options document because the sites had not been identified as having the potential for 250 homes - the threshold used for a strategic site. The comments received in this consultation are however helpful in highlighting relevant considerations for the future of these areas. Further work will be undertaken to understand these constraints as the Plan progresses.

23. Other Strategic Sites and Areas of Opportunity

25 comments received regarding this topic.

Have we identified all the potential Strategic Sites and Areas of Opportunity? What others should we be looking at?

Three respondents thought that the consultation document identified all the potential strategic sites and areas of opportunity. Two respondents stated no more areas should be considered, due to lack of space and inadequate infrastructure.

Current Sites:

One respondent thought that the city centre is understated as a housing opportunity.

Milton Neighbourhood Forum and one other respondent questioned the inclusion of St James' Hospital and Langstone Campus, which should not be considered a strategic site as it is too remote from public transport and there is insufficient capacity for sustainable development.

Two respondents questioned the suitability of identification of the seafront.

Other Specific Sites/ Uses and Areas of Opportunity:

Respondents mentioned specific sites for consideration, including the dockyard, the University area, The Hard (including Brunel House), Frasers Battery in Eastney, and the area around Airport Service Road.

Three respondents highlighted the northern part of the island, specifically Hilsea as a broad area, with one mentioning Hilsea Station as a specific site. Others mentioned areas off Portsea Island - Paulsgrove, Drayton, Farlington and Portsdown Hill.

One commented that the document should identify sites for schools, cemeteries and allotments.

Other Comments:

One respondent found the consultation difficult to respond to and struggled to find the plan on the Council's website.

Initial Council Response:

Given the evidence of need for housing, employment and other uses it is proposed for further work and investigation to be undertaken in investigating the potential of these other suggested areas to deliver development. Hilsea, Buckland and Paulsgrove in particular should be re-examined because of the level of interest and the position of the Council as a significant landowner.

The wide ranging nature of the comments regarding the seafront are thought due in part to the different characteristics of various parts. Further consideration will be given to whether this area represents a "broad area of opportunity" or instead should be thought of in a different way. It is thought that St James / Langstone should continue to be considered as a potential strategic site. The suitability and deliverability of the site, and the appropriate mixture of uses, will be determined through the ongoing work outlined in the response to comments made in section 13.

24. Any Other Comments

Do you have any other comments or suggestions on matters not covered by the consultation questions?

A range of general issues/concerns were highlighted in the 'other comments' section such as follows.

The Local Plan's Strategic Approach to Development

- Portsmouth's planning needs to be considered carefully, overdevelopment will detract from the city's appeal.
- The plan does not creatively investigate the real potential of our claim to be "The Premier Waterfront City".
- The aim of being an attractive waterfront city, welcoming visitors to strengthen its economy, appears to be in conflict with the aim of encouraging a huge building programme and population growth in an already overburdened city.
- The strategic context (paragraph 2.1) should include a section on flood defences as one of the major issues for the planning period.
- A policy framework should be generated at Local Government level and not more remote organisations who cannot appreciate all the issues.

Portsmouth Cultural Trust felt that places continue to succeed despite changes in economic conditions because their built form is highly adaptable. A good cultural quarter should be authentic but also innovative and changing.

Havant Borough Council expressed their commitment to continuing to work with Portsmouth City Council regarding landholdings that the Council owns in Havant Borough. It is highlighted that this land portfolio offer has already provided significant development, most notably at Dunsbury Park. As well as optimism expressed for continuing a positive working relationship regarding positively planning for the future of the Solent area so that the challenges of housing need and affordability to the benefit of future generations can continue to be addressed.

In their response, **Landsec (Gunwharf Quays)** considered that there were other matters to take into account when considering the city's overall growth strategy including:

- The importance of accommodating other main town centre uses (such as offices, leisure and hotel) in the correct locations, particularly in the city centre.
- The need to ensure that transport considerations are taken into account when assessing alternative growth options in the new Local Plan.

Landsec also suggests that Opportunity Areas may be able to come forward for (re)development before the 6-15 year timeframe stated in the issues and options document. In addition, that Strategic Development Sites and Opportunity Areas should be given the same weight and status in terms of allocations and strategy in the new Local Plan. Furthermore they considered that there is merit in extending the proposed opportunity area boundary for the city centre southwards to cover the ferry terminal and BAR Racing areas.

Constraints in the city

Several respondents, including the Milton Neighbourhood Planning Forum, highlighted concerns that the Council was planning for development without appropriately considering the current constraints in the city first, and that the island presented limited opportunities for further intensification.

- Infrastructure must be in place first in order to meet the aims of the Local Plan.
- Development should not overload the city's infrastructure and new infrastructure should encourage sustainable transport.
- Plan does not address the strategic implications of changes in population nor the anticipated increasing demands of the future population.
- The student population is too large.
- Financial incentives from new development are not sufficient to outweigh their impacts.
- "The city does not have the room to grow its way out of its current problems".

One respondent considered that "the fundamental decisions have already been made about the quota of new homes, jobs, and retail and it's just a case of fitting them in as best we can, which is the Local Plan's job."

Meeting needs of current residents

Another common theme arising in the responses to the 'other comments' section, was that of the need for the Plan to meet the needs of current residents. Two responses, for example, specifically stated that the plan needs to be written for the benefit of existing residents rather than as a development opportunity for the property industry. Other points raised highlighted the need to address current issues for local people including poor health, lack of education, lack of affordable housing, high unemployment, congestion, parking, poor housing quality, low wages, lower life expectancy, general quality of life and challenges stemming from the expanding university. Redevelopment in the opportunity areas should focus on the people; local residents need somewhere within walking distance to work, to live, to relax.

Other comments highlighted that the Plan needs to solve issues of lacking infrastructure, lack of schools, healthcare services, and community centres, as well as trying to improve the environment and prioritise the cultural and historical aspects of the city; in order to support building more houses.

One member of the public had some particular comments about the Cosham area stating the need for more leisure uses on the High Street and a better lit/safer route from the High Street, through to Wooton Street via the community centre to reduce crime.

In terms of waste related concerns it was suggested that the recycling offer by Portsmouth City Council needs to improve. The city should be kept clean with fly tipping, litter and dog mess addressed.

Education

Education and school provision was touched upon by a couple of respondents with one member of the public observing that "none of the strategic sites offer new school provision as a suitable option".

The **Education & Skills Funding Agency** stated several points:

- "One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments."
- "The next version of the plan should make clear the proposed funding mechanisms for how infrastructure required to support new development will be delivered, with cross-reference to the IDP and other evidence as appropriate. Such evidence should explain the basis for pupil yield calculations and the costs of delivering school places for both expansions and new schools, including special educational needs provision."
- "Paragraph 7.6 states that Development Management policies will cover the key priorities for developer contributions, though education is not specifically identified among the types of infrastructure listed. The ESFA recommends an overarching strategic policy on Infrastructure Delivery to support the growth set out in the plan."

Transport

There were a number of issues raised relating to transport considerations such as:

- Consideration of a city wide residents parking scheme.
- Traffic on Queen Street getting worse.

There were some conflicting views regarding public transport with one resident remarking that public transport, specifically buses, are unreliable; whilst another expressed that the bus network is a positive and should be kept going. A couple of other points were raised relating to public transport:

- The bus lanes next to moneyfields allotments should be protected to avoid 'rat run' links forming.
- Investigate making the Lakeside area easier to get to via public transport.

A couple of individuals raised concerns over air pollution in this section, with one respondent raising concern over the potential for more housing leading to more traffic and therefore air pollution.

Housing

There were some issues raised regarding housing provision in the city including that there was simply too much housing being built on Portsea at present.

The **Portsmouth Labour Party** gave support to their affordable housing plan making the following specific points:

- Use council resources to build local affordable housing.
- Enforce affordable housing requirements on private developers.
- Make new student housing/accommodation contribute towards affordable housing.

The Portsmouth & District Private Landlords Association consider that the continued negativity towards HMO's and the resistance to many new developments hinders the city as a whole and discourages the refurbishment of individual properties which is required if whole areas are not to fall into dereliction.

Working together

A couple of points were made about the need for the Council to work with other organisations during the plan-making process particularly the University and the Milton Neighbourhood Forum.

The **Portsmouth Cultural Trust** expressed support for the development of the Local Plan as did several others.

One member of the public expressed that there should be a diagram illustrating the hierarchy of decision-making and explaining how the plan fits into wider government and sub-regional strategies (e.g. NPPF, SSPS and SEP).

Another respondent felt there should be a mechanism for updating the document based on new data during the Plan's life.

Three respondents expressed the desire to see the feedback from the consultation with a paper summarising the findings from the Issues and Options Consultation and how these will influence the process.

Issues and Options consultation

A number of consultation responses related to the Issues and Options consultation documents. Whilst the Portsmouth Society commented positively on the document writing that it was "A well written and presented document, and the glossary is very helpful." Amongst other respondents there was some feeling that it had been difficult to engage with the materials that the Council had produced for the consultation. One respondent felt that there was too much information scattered throughout the documents making it difficult to provide a structured response. Whilst another expressed the opposing view that the Issues and Options document was too vague for comment at this stage.

In terms of the content itself, one member of the public expressed dissatisfaction with the Issues and Options document and commented that "Actual figures for housing, employment and retail are not given until section 5 and 6, under 'Strategic Options for Growth' and Strategic Development Sites and Opportunity Areas for Growth. The first forty pages are just a systematic list of issues to be covered."

Another response indicated that they felt people should have been directed to read the Sustainability Appraisal Scoping Report first.

A couple of respondents raised issues over the accuracy of some of the data underpinning the document as the following comments suggest:

- Friends of Old Portsmouth Association stated that "It is evident that the survey data, particularly relating to retail, is out of date and that perhaps this information needs reviewing and updating for inclusion in the next draft."
- Another respondent stated that the data relating to retail and flood defences used in the document is out of date.
- Whilst another posed the correction: the dockyard is not the largest employer in Portsmouth, the NHS is.

Issues and Options consultation process

Several respondents have expressed thanks for having the opportunity to comment and to make suggestion regarding the new Local Plan. However, at least six respondents commented that they felt the Issues and Options consultation had not been publicised enough or for too little time for such a lengthy document. One of those respondents concluded that "this has created a feeling that the Council is indifferent to the views of the people who live in the city."

Issues were also raised regarding the accessibility of the consultation process and more specifically the online elements. One member of the public wrote that they felt the website to be poorly designed and difficult to complete.

The online survey was referenced as a source of difficulty for at least three respondents when trying to respond to the consultation. A couple of these comments related to the requirement for having to complete the survey form in one go, rather than being able to save it along the way and fill it out in multiple sessions before submitting it. Furthermore two comments highlighted concerns that the survey questions would steer consultation responses down a particular direction or towards a narrow set of issues rather than encouraging wider dialogue around the issues.

Friends of Old Portsmouth Association expressed that "There should have been ample opportunity to dedicate forum meetings and focus groups to this subject and have meaningful face-to-face exchanges of ideas." They expressed hope that in the next rounds of consultation over the new Local Plan, this will happen.

Initial Council Response:

These comments cover a wide range of issues which will be reflected upon as the Plan progresses. Regarding the consultation arrangements, in total, 300 persons attended the exhibitions and consultation responses were received from 363 individuals, businesses and organisations, which is considered a reasonable outcome. However, there may be ways in which future consultations can be conducted to improve this outcome and the Cabinet report sets out some initial thoughts on how this could be achieved, which will be reflected on by officers.

Regarding the consultation materials themselves, there is always a balance to be achieved between giving parties information to inform their responses, and (particularly in the case of individuals and others considering the consultation in their spare time) overloading people. The rationale of the consultation was that the Issues and Options document itself had sufficient information to cover the wide range of subjects in the Local Plan, with additional, more detailed information available in the supporting material, should people wish to access it and comment upon it. During the consultation itself, officers handed out summary leaflets at exhibitions, and the exhibition materials (which summarised the consultation) were placed online to provide people with a shorter summary. A few respondents to the consultation did however comment that they found the material difficult to access. While overall it is thought the approach used was appropriate for the consultation, future rounds could make use of additional accessible materials focussed on key issues.

25. Comments on Other Documents

14 comments were made on this topic.

Do you have any comments regarding the other supporting documents?

Draft Sustainability Appraisal Scoping Report (March 2017)

One party considered the document contains some useful base data, but questioned why there were no plans to increase numbers of electric charging points, no data on vacant housing stock, or plans to improve accommodation space in new dwellings and reduce deprivation. The following suggestions were made for amendments to the Sustainability Framework:

- SA7 Conserving and enhancing the historic townscape. Needs firmer indicators, suggest: No listed buildings, tall buildings or developments in Conservation Areas will be permitted unless they positively preserve or enhance the area. Further supporting evidence should be provided.
- SA8 Requiring good urban design in Portsmouth. Suggests that PCC produce a guideline for architects and developers which they must have consulted before submitting designs. This document would state that good innovative designs, respecting their site, are preferred and poor or bland designs are likely to be refused (Mentions Greetham Street student accommodation).

The **Portsmouth Tackling Poverty Steering Group** has made comments regarding how social issues are stated in the SA and has offered to discuss potential indicators that could help to demonstrate appropriate objectives. It also highlights the role Section 106 legal agreements can play in delivering benefits for the city and encourages their use in targeting deprived areas and groups.

Portsmouth Cycle Forum suggested sustainability objective SA7 should contain the word 'safe' within it, and raised the following detailed points on the Promoting Sustainable Transport in Portsmouth section:

- The document should talk about enabling rather than encouraging cycling and recognise the age of the census data used and make more use of other sources, such as outputs from cycle counters and potentially make outputs public to encourage cycling. This data could also be used for monitoring progress (p27).
- 2016 road casualty data for cycling will be available circa October 2017 and should be added to future documents (p33).
- Question the mention of the Cycle Defect Rectification Scheme which implies cyclists are not sensible road users. There should be data from Hants Constabulary close pass operations in the city to highlight the danger cyclists face on a daily basis from motor vehicles (p34).
- Limited highway space should not preclude reconsidering the potential for segregated routes for the benefit of all users, particularly as safety is identified as a deterrent to cycling (p35).
- Should reference the recently published Cycling and Walking Investment strategy from the DfT (p38).

Initial Council Response:

The SA is a key part of the Local Plan process. It is anticipated that further specialist advice is required to assist in this work as the Plan progresses to ensure the Council's responsibilities in this area are fulfilled. Responses made to the Interim SA document will be discussed with those specialist advisers and inform the way forward.

Interim Sustainability Appraisal (SA)

One respondent stated the SA implies the recreational stresses on the coastal sites can be mitigated which they disagree with. Another considered the SA does not address the costs of the social and environmental impacts of development- it merely identifies them and should appraise those costs (e.g. health costs) in the same way as economic viability.

One respondent stated no mention is made of the Fort Cumberland SINC adjacent to Fraser Range, and outlined previous acknowledgments of the biodiversity of the site.

Portsmouth Cycle Forum made the following detailed points regarding the assessments of Transport Options:

- Point 4 – Climate Change – should recognise active travel and the role they could play in reducing emissions given further priority.
- Point 5 – High Quality Homes – should recognise that new homes increase parking requirements, and there should be a minimum off road parking requirement for all new developments.
- Point 9 – Natural Environment - questions how will PCC ensure there are a higher proportion of electric vehicles? Will this be a stronger part of the parking standards?
- Appendix A: Key Sustainability Issues – Transport: None of these items relate to transport, and are in fact a cut and paste repeat of the retail sections which appear immediately above it.

Initial Council Response:

The SA is a key part of the Local Plan process. It is anticipated that further specialist advice is required to assist in this work as the Plan progresses to ensure the Council's responsibilities in this area are fulfilled. Responses made to the Interim SA document will be discussed with those specialist advisers and inform the way forward. Regarding the final point on transport, the comments are agreed. Appendix 1 of the Interim Appraisal SA document sets out the sustainability issues identified in Part 2 of the SA Scoping Report. In the case of transport, the main issues have been taken from the wrong part of the report. The key sustainability issues identified for Transport in the Scoping Report are as follows -

- Encouraging a modal shift and public realm improvements including expansion of Park and Ride.
- Creating a walkable city where people take priority over the needs of the car.
- Tackling congestion and air pollution.
- The need for a better and safer network of routes for cyclists and walkers to connect to jobs, homes and leisure facilities.
- Ensuring better access for the disabled to public transport.
- Problems with on street car parking.

These issues were used to form the Sustainability Objectives which were published in the Scoping Report and Interim Appraisal and have been included in this consultation. Therefore it is considered that the consultation has provided people with the opportunity to comment on this aspect. Future iterations of the SA will include reference to the correct transport issues.

Habitats Regulations Assessment (HRA)

The **RSPB** considered the HRA screening report appropriately recognises the need to consider supporting habitat and, along with **Hampshire and Isle of Wight Wildlife Trust**, noted the Solent Wader and Brent Goose Strategy, which is being updated, will provide greater clarity on the importance of sites, which will be an important tool for informing the emerging Local Plan and HRA.

In addition, the RSPB noted the Solent Recreation Mitigation Partnership definitive strategy is near finalised and should be available for consideration as part of the emerging Local Plan and draft HRA.

One respondent commented that a map of potential residential sites is too high level on which to comment. Specific addresses should be provided.

A respondent disagrees that the recreational stresses on the coastal sites can be mitigated - consider the HRA to be flawed because it implies a developer can make a financial contribution to mitigate environmental damage.

Council Response:

The HRA is a key part of the Local Plan process. Progress made in initiatives such as the Solent Recreation Mitigation Partnership definitive strategy will be useful in taking the work forward, but it is anticipated that further specialist advice is required to assist in this work as the Plan progresses to ensure the Council's responsibilities in this area are fulfilled.

Statement of Community Involvement (SCI)

One respondent considered the consultation process is not made easy for the person in the street to contribute.

Portsmouth Cycle Forum suggested the Council consider how on-street notices are used to encourage more public engagement in planning decisions, that the statement should include details of how to sign up to the planning application mailing list, and the SCI should outline the role of travel plans, the obligations developers have under them, and the engagement that should be encouraged between developers re travel plans.

Council Response:

Comments regarding the arrangements for planning applications have been passed to colleagues in Development Management for consideration as and when the Statement of Community Involvement is reviewed. Overall it is considered the lack of responses here mean that measures are broadly supported, but there are ways in which Local Plan consultations can be improved. Some initial consideration of how the Local Plan consultations were undertaken, and the outcomes of that consultation, will be reported to Members for consideration.

Authority Monitoring Report

Document contains useful base data, but should have been published earlier and better monitoring indicators could be used to judge progresses.

Council Response:

Some of the comments here are acknowledged. It is intended that future monitoring reports are published as soon as possible after the year end. The next monitoring report is being prepared and the selection of monitoring indicators will be reviewed as part of preparing that document and the

General comments on consultation

On person considered many of the supporting documents should not have been part of the consultation as they are less relevant for most people.

Two respondents noted that existing adopted Supplementary Planning Documents (SPDs) were listed in the consultation document but were not included and no reference given as to how to find them.

Council Response:

The intention was for the Issues and Options document to provide sufficient information for people to be able to respond to the consultation, with additional information available on particular topics, such as housing and sustainability, should people wish to read in further detail. The adopted SPDs were on the Council website and were not part of the consultation. However, comments raised here about making all materials easier to find will be taken on board when future consultation documents are prepared.

Index of Consultation Respondents

The following table sets out the names of individuals and organisations who responded to the consultation. A respondent number has been assigned to each respondent to assist in administering the responses. The purpose of the table is to enable respondents to find where their points have been summarised in this document.

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
IO 01	M. Birchmore	1
IO 12	R. Coghlan	1, 3, 4, 13, 14, 17, 18, 19, 20, 22, 23, 25
IO 24	J. Meade	1
IO 25	P Clark	1
IO 26	L. Farmer	1
IO 31	J. Brown	1
IO 32	S. White	10
IO 37	C. Bradshaw	4, 15, 16, 18, 22
IO 46	O. Robertson	1, 2
IO 50	H. Gill	1
IO 52	J. Galloway	1, 2, 3, 5, 6, 8, 10, 12, 13, 14, 15, 18, 19, 22
IO 54	S. Thomas	1, 2, 3, 4
IO 56	R. Emery	1, 2, 3, 4
IO 57	S. Potter	1, 2, 3, 4, 5, 6, 10
IO 59	S Rudra	1, 2, 3, 4, 5, 6, 7, 10, 13, 14, 15, 16, 22
IO 60	K Bailey	1, 2, 3, 4, 5, 6, 7, 8
IO 62	C Birkby	1, 2, 3, 4, 5, 6, 9, 10, 17, 22
IO 65	R. Kiddle	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 24
IO 66	K. Bailey	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 21, 22
IO 74	C. Lawrence	1
IO 75	C. Barber	1
IO 76	J. Cullen	1
IO 77	Paulsgrove Residents Association	1, 2, 5, 6, 9, 10, 13, 14, 16, 18
IO 82	P Pattington	1, 2, 3, 4, 5, 6, 8, 9, 10, 13, 14, 15, 16, 22, 25
IO 83	A Henderson	1
IO 85	J. Bateman	1, 2, 13, 14
IO 86	D. Smith	1, 2, 3, 4, 5, 6, 7, 8, 10, 13, 14, 15, 16, 22, 24
IO 87	C Wood	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 88	I Walker	1, 2, 4
IO 90	P Harling	1
IO 93	E. Harry	6, 10
IO 94	P Higgins	13, 15, 25
IO 95	S Harry	2, 15, 17
IO 96	M Ball	2, 10, 22, 24
IO 97	A Barnes	1, 2, 4, 13, 15, 22, 24
IO 98	R Barnes	10, 15
IO 99	D. Dron	1, 2, 3, 24
IO 100	L Hilborne	1, 2, 8, 24

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
IO 101	P Daly	15
IO 102	K Baker	1, 15, 17, 24
IO 103	V Chatwin	13, 14, 18, 24
IO 105	A Griffin	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 20, 22, 23, 24, 25
IO 106	R Ellcome	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23
IO 107	P Higgins	1, 2, 4, 15, 17, 23
IO 109	N Hicks	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 16
IO 110	Theatres Trust	1, 5
IO 113	R Bailey	22
IO 117	K Pitt	2, 3, 4, 5, 6
IO 118	G Curtis	1, 2, 3, 4, 5, 6, 7, 8, 10, 13, 14, 15, 16, 17, 21, 22, 24
IO 119	J Holt	10, 24
IO 120	D Dod	2, 4, 6, 7, 10
IO 121	C Gregory	4, 10, 11, 24
IO 122	C Corkery	2, 13, 15, 24
IO 123	Portsmouth Labour Party, GMB	2, 8, 19, 24
IO 124	M Johnson	1
IO 125	R Stanley	24
IO 126	S Boden	24
IO 127	Anon	1
IO 129	B Harmer	6
IO 131	POSOL	1, 14, 24
IO 132	R Cady	1, 2, 3, 4, 5, 7, 10, 17, 22
IO 134	M Mansfield	15, 24
IO 135	B Mansfield	24
IO 136	M Hunt	1
IO 137	J Skila	1
IO 139	J Bailey	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 24, 25
IO 140	S McLean	1
IO 141	K Pitt	2, 6, 10, 13, 14, 15, 16, 20
IO 144	P Rimmer	2, 3, 4, 5, 6, 7, 13, 14, 15, 16, 17
IO 145	L Turner	1, 2
IO 147	RAPS (Residents Association of Port Solent)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 148	M Grice	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24
IO 149	T Pearson	11
IO 151	P Grunchy	11
IO 152	K Jordan	1, 2, 3, 4, 8, 10, 13, 14, 15, 16, 17, 22, 24
IO 154	R Hudson	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
IO 155	T Bridgen	1, 2
IO 157	A Venables	1, 2
IO 158	PDLA	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 22, 23, 24
IO 159	Anon	1, 2, 3, 4
IO 160	H Jamieson	22

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
IO 161	D Hawkins	22
IO 163	R Hussey	22
IO 164	D Reid	22
IO 165	C Shek	22
IO 166	R Blackmore	22
IO 167	H West	22
IO 168	J Ramadan	1, 2, 4, 9, 13, 14, 15, 16, 17, 20
IO 169	L Clifton	22
IO 170	D Reynolds	22
IO 171	D Bendel	2, 4, 5, 6, 8, 9, 10, 15
IO 172	Butterfly Conservation	9
IO 173	P Pattington	2, 3, 10, 22
IO 174	Winchester City Council	2, 11
IO 175	Hampshire & Isle of Wight Wildlife Trust	1, 6, 8, 9, 11, 12, 14, 15, 22, 25
IO 177	N Scarlett	2, 9, 22, 24
IO 178	C Langan	22
IO 179	R Langan	22
IO 180	J Thompson	22
IO 181	J and S Dungworth	22
IO 182	K Mansfield	22
IO 183	Forman Homes Ltd	1, 2, 23, 24
IO 184	C Fogden	8
IO 185	B Stancliffe	22
IO 188	P O'Hara	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24
IO 189	Portsmouth Cultural Trust	3, 5, 7, 24
IO 193	J Micheletta	1
IO 195	A Khopkar	2, 3, 4, 7, 8, 10, 22
IO 198	Tetlow-King Planning	2, 24
IO 199	J Lloyd	2, 3, 4, 7, 8, 10, 22, 24
IO 201	J Bateman	2, 3, 4, 7, 8, 10, 22
IO 202	Sport England	1, 6, 15
IO 203	L Prowse	1, 2, 3, 4, 5, 7, 8, 13, 14, 15, 16
IO 206	T Halloran	1, 2, 3, 4, 5, 7, 8, 10, 11, 22, 24, 25
IO 218	K Knowlson- Clark	2, 3, 4
IO 220	C Seek	1, 2, 3, 6, 7, 9, 10, 11, 12, 24
IO 221	Milton Neighbourhood Planning Forum	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 23, 24, 25
IO 238	I Townley	2, 4, 13, 14, 15, 16
IO 239	O Stone-Houghton	1
IO 240	D Ware	1, 2, 4, 10, 15, 22
IO 243	National Landlords Association	2, 3, 10
IO 244	K Wallis	2, 3, 4, 7, 8, 10, 22
IO 245	M Organ	2, 22
IO 246	P Organ	2, 22
IO 247	J Butterworth	22
IO 248	M Doyle	15
IO 249	Southern Water	10, 11, 13, 14, 15, 16, 17, 24
IO 251	Portsmouth Green Party	1
IO 255	N Scalett	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 17, 22, 23,

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
		24, 25
IO 256	P Pritchard	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 22
IO 257	Public Health Portsmouth City Council	1, 2, 6, 8, 10, 22
IO 258	P Pritchard	1, 2, 3, 4, 6, 9, 10, 11, 13, 14, 15, 17, 18, 19, 20, 22
IO 259	M Froggatt	1, 2, 3, 4, 8, 10, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22
IO 260	A Gill	1, 2, 6, 10, 12, 15, 22, 24
IO 261	P Docking	2, 3, 6, 10, 11
IO 263	L Nicholas	1, 2, 3, 5, 6, 8, 10, 11, 15, 24
IO 264	K Rimmington	1
IO 265	K Rimmington	1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 13, 14, 15, 17, 18, 19, 20, 22
IO 266	H Stainton	2, 4, 7, 9, 10, 11, 15, 18, 19
IO 267	S Mackie	1, 2, 3, 4, 6, 8, 9, 13, 14, 15, 16, 20
IO 268	F Dalmar	13, 20, 22, 23, 24
IO 269	L Choudhury	6, 11, 24
IO 270	Hampshire County Council (responses from Countryside Services regarding Rights of Way and HCC as a Minerals & Waste Planning Authority)	1, 6, 10, 11
IO 271	LDA Design on behalf of the Homes and Communities Agency (HCA)	2, 15
IO 273	LDA Design on behalf of the Homes and Communities Agency (HCA), NHS Property Trust (NHS) and University of Portsmouth (UoP)	15
IO 275	J Harden	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 15, 17, 22, 24
IO 276	R Kay	1
IO 277	A Koor	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24
IO 278	LDA Design on behalf of NHS Property Services Limited (NHSPS)	15
IO 279	Sustrans	1, 2, 4, 5, 6, 7, 10
IO 281	Cllr M Winnington	1,
IO 282	D Leslie	1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 15, 23, 24
IO 283	Cllr M Winnington	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 284	L Burberry	1, 2, 3
IO 286	Fareham Borough Council	1, 2, 16
IO 287	Portsmouth's Tackling Poverty Strategy Steering Group	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 288	J Burkinshaw	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
IO 289	S Jenkins	1, 11
IO 290	V Strange	2, 10, 24
IO 291	Portsmouth Liberal Democrat Council Group	1, 2, 10, 17
IO 292	K Nash	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 293	S Thomas	1
IO 295	S Thomas	1
IO 296	S Thomas	1
IO 298	I Steele	4
IO 299	M Nash	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24
IO 301	M Callan	1, 2, 3, 4, 5, 6, 8, 9, 10, 12, 13, 14, 15, 22
IO 302	J Mayes	1
IO 303	Cllr B Dowling	15
IO 304	Portsmouth & District Private Landlords Association	1, 2, 3, 4, 5, 6, 7, 8, 10, 22, 24
IO 305	R Cobb	22
IO 306	S Simmons	2, 9, 15, 24
IO 307	Historic England	1, 2, 5, 6, 7, 8, 12, 13, 15, 16, 17
IO 308	CBRE Ltd On behalf of Premier Marinas Limited and CBRE Global Investors (on behalf of USF Nominees Ltd)	14
IO 309	Portsmouth Cycle Forum	1, 2, 3, 4, 5, 6, 10, 15, 17, 18, 19, 20, 21, 22
IO 310	WYG on behalf of Sainsbury's Supermarkets Ltd	17, 24
IO 311	Havant Borough Council	2, 24
IO 312	The Portsmouth Society	1, 2, 4, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24
IO 313	Portsmouth Cycle Forum	1, 7, 10, 14, 15, 16, 24, 25
IO 314	House Builders Federation	2, 24
IO 315	GVA on behalf of Landsec	1, 2, 3, 4, 5, 6, 7, 10, 17, 24
IO 316	Urban Vision Enterprise CIC On behalf of the Milton Neighbourhood Forum	15, 24
IO 317	Quod on behalf of RPMI Railpen	17
IO 318	Barton Willmore on behalf of Centros Portsmouth Limited Partnership (CPLP)	17
IO 319	Barton Willmore	1, 5, 6, 10, 11, 22, 23, 24
IO 321	Friends of Old Portsmouth Association	1, 2, 3, 6, 7, 10, 24
IO 322	Montagu Evans	1, 4, 17, 24
IO 323	S Crouch	1, 2, 3, 4, 5, 6, 7, 9, 10, 15, 17, 22, 23, 24, 25
IO 325	Barton Willmore LLP on behalf of University of Portsmouth	1, 2, 3, 4, 5, 6, 7, 15, 17, 23, 24
IO 326	P Critchett	2
IO 327	Portsmouth Fabian Society	1, 2, 3, 4, 6, 10, 11, 24

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
IO 328	S Thomas	2, 4, 10
IO 329	S Wallis	22, 24
IO 330	Natural England	1, 6, 9
IO 331	L Burberry	22
IO 332	P Mills	2
IO 333	B Crawford	22
IO 334	The Royal Society for the Protection of Birds (RSPB)	1, 2, 6, 9, 13, 14, 15, 22, 24, 25
IO 335	R Kay	1, 2, 7, 10, 19, 24
IO 336	J Banforth	1, 2, 4, 7, 10, 13, 22, 24
IO 337	S Morgan MP	15, 24
IO 338	Environment Agency	7, 9, 11, 13, 14, 15, 16
IO 339	Chair of the Portsmouth Labour Housing Forum	2
IO 340	Gosport Borough Council	1, 2, 3, 5, 6, 9, 10, 17
IO 341	R Thomas	3, 4, 8, 24
IO 342	W Crouch	1, 2, 3, 4, 5, 6, 7, 9, 10, 15, 17, 22, 23, 24, 25
IO 343	Health and Safety Executive	11
IO 344	Southsea Association	2, 24
IO 345	Education & Skills Funding Agency	1, 3, 6, 11, 12, 13, 24
IO 346	C Seek	6
IO 347	Hampshire County Council, Hampshire Countryside Access Forum (HCAF)	24
IO 348	M Yang	22
IO 349	Deloitte LLP on behalf of Northwood Investors International Ltd	2, 3, 4, 7, 16, 17, 18
IO 350	K Nash	1, 2, 4, 7, 10, 15, 24
IO 351	A Broome	22

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Equality Impact Assessment

Full assessment form v5 / 2013

www.portsmouth.gov.uk

Directorate:

Director of Regeneration

**Function e.g. HR,
IS, carers:**

Planning

Title of policy, service, function, project or strategy (new or old):

Local Plan Issues and Options

Type of policy, service, function, project or strategy:

☐ New / proposed

☒ Changed

☐ Existing

Lead officer

Toby Ayling

People involved with completing the EIA:

Toby Ayling
Gina Perryman

Introductory information (Optional)

The Council is preparing a new Local Plan for Portsmouth. This document will set out a planning strategy to meet future development needs in the city for the period to 2034. The Plan will set out details on the level of development which will take place in the city and where it will be located. It will contain planning policies to guide decision making on planning applications.

The process of reviewing the Local Plan is expected to take two years and will include various stages of public consultation. The timetable for the production of the Plan is set out in the Local Development Scheme. The Issues and Options document is the first stage in this review process.

A preliminary Equality Impact Assessment was prepared to accompany the Cabinet report proposing the Issues and Options consultation. This assessment has been prepared in light of the consultation responses.

The Issues and Options consultation set out the planning issues facing the city, proposes a vision and objectives for the Plan and identifies 46 policy options for how the new Local Plan could address them. Ultimately the options chosen and the strategy set out in the new Local Plan will be informed by national planning policy framework and relevant legislation; technical evidence base documents; the sustainability appraisal and habitats regulations assessment. The purpose of this document is to record possible impacts on the basis of current knowledge.

Step 1 - Make sure you have clear aims and objectives

What is the aim of your policy, service, function, project or strategy?

To develop a strategic plan for meeting the future development needs of Portsmouth.

The Issues and Options document sets out a vision for Portsmouth - "To make Portsmouth the premier waterfront city with an unrivalled maritime heritage - a great place to live, work and visit." and a series of key objectives -

- O1. To provide a range of housing in locations where people want to live
- O2. To develop a successful and diverse economy with employment opportunities for all
- O3. To promote the viability and vitality of the city centre, Southsea town centre and other smaller centres in the city
- O4. To protect and enhance the historic character, arts and culture of Portsmouth
- O5. To provide supporting infrastructure for Portsmouth's residents, businesses and visitors
- O6. To support the health and wellbeing of residents by providing access to health care, protecting/enhancing open spaces, providing sports and leisure opportunities, reducing air pollution and providing for biodiversity
- O7. To make Portsmouth accessible with a range of sustainable and integrated travel options
- O8. To provide high quality design and an attractive, sustainable and safe city

Delivering these objectives should have beneficial impacts for all residents. Some objectives, for instance the aim to "provide a range of housing in locations where people want to live" have implications for particular groups.

This EqIA relates to the outcomes of the Issues and Options consultation which is being reported to Members. No decisions have been taken yet on the Local Plan. The purpose of this stage is to understand the views of residents and appropriate organisations at an early point in the Local Plan-making process and to inform the work to be undertaken in bringing forward the next stages of the new Local Plan.

Who is the policy, service, function, project or strategy going to benefit or have a detrimental effect on and how?

A new Local Plan covering Portsmouth will provide a framework for decisions on planning applications and therefore provide for meeting the development needs of residents, businesses and other organisations with an interest in Portsmouth and development within it. As such it will affect all residents.

The development strategy contained in the new Local Plan will impact upon the natural and built environment of the city, including the amount and type of housing available, the amount and type of employment sites developed and safeguarded, transport around the city, the protection of open spaces and ecological assets, and the provision of social infrastructure.

What outcomes do you want to achieve?

The deliver a sound Local Plan which delivers the proposed Vision for Portsmouth
That the duties under the Equality Act 2010 are fully complied with.

What barriers are there to achieving these outcomes?

The Plan is required to be justified by evidence and meaningful engagement with communities and interested parties. It must comply with all relevant legislation and be found sound at independent Examination.

Step 2 - Collecting your information

What existing information / data do you have? (Local or national data) If you don't have any data contact the Equalities and diversity team for some ideas

Existing information the existing population of the city is set out below -

RACE

British - 84.00% ONS and HCC data

White Irish - 0.50% ONS and HCC data

Other White Background - 3.80% ONS and HCC data

Mixed White & Asian - 1.20% ONS and HCC data

Other Mixed Background - 0.50% ONS and HCC data

Indian - 1.40% ONS and HCC data

Bangladeshi - 1.80% ONS and HCC data

Other Asian Background - 1.30% ONS and HCC data

GENDER

Male - 50.30% ONS and HCC data

Female - 49.70% ONS and HCC data

AGE

0-15 - 17.32% ONS and HCC data

16-24 - 18.88% ONS and HCC data

25-34 - 15.05% ONS and HCC data

35-44 - 13.49% ONS and HCC data

45-54 - 12.57% ONS and HCC data

55-64 - 9.33% ONS and HCC data

65-74 - 6.76% ONS and HCC data
75+ - 6.61% ONS and HCC data

The ageing factsheet produced by Hampshire County Council notes the number of very old people has increased as each decade passed, as has the proportion of the population occupying the very oldest age groups. However, the number of older people has declined overall. There was a small increase between 1981 and 1991 and then a consistent decline over the next two decades

DISABILITY

The Council's Equality and Diversity Strategy notes that in 2013 over 15000 of residents have a long-term health problem or disability that limits their day-to-day activities, almost 3500 adults in Portsmouth were registered as having a physical disability, and over 2000 residents are registered as having a hearing or visual impairment. The percentage of residents have a long-term health problem or disability that limits their day-to-day activities is approximately 7% of the total population.

Using your existing data, what does it tell you?

The existing data shows that Portsmouth is a city which Portsmouth has a relatively young population compared to adjoining areas. The biggest share of the population is in the 20-24 age group which is mainly due to the students studying at the University of Portsmouth. Population forecasts show that further changes in the population structure are expected, with a decline in the 40-54 years age group and increasing numbers of people aged 65 or over.

The majority of Portsmouth's households are one family households (55.85%), significantly lower than the surrounding areas and one person households comprising 32.1% which is higher than surrounding area. Average household size has changed very little standing at 2.3 persons per household, slightly higher than most other Hampshire districts

Step 3 - Now you need to consult!

Who have you consulted with?

All residents in the city.
Community Associations
Resident and community groups
Voluntary and business groups
Other relevant organisations

If you haven't consulted yet please list who you are going to consult with

Please give examples of how you have or are going to consult with specific groups or communities e.g. meetings, surveys

1. The Issues and Options document and supporting material was the subject of public consultation from 3 August to 28 September 2017. The following measures were undertaken to publicise the consultation:

- Publication on the Council's website;
- Specific contact of statutory bodies, including neighbouring authorities;
- Local press releases, and a formal notice in the Portsmouth News;
- Direct contact of all parties currently in the Planning Policy consultation database;

- e) Direct contact of all parties on the Action Portsmouth, Shaping Portsmouth and Portsmouth Together networks as well as the Council's Citizen's Panel; and
- f) Features on the Council's social media accounts (Facebook and Twitter).

2. In addition, paper copies of the main consultation materials – the Issues and Options consultation document, the Sustainability Appraisal and the Habitats Regulations Assessment were made available at all the libraries within the city and the civic offices. The Issues and Options document along with response forms was also sent to all community centres. This ensured there was availability for the documents for those who were unable to access the documents online.

3. A series of five staffed public exhibitions was arranged across all parts of the city, held on weekday afternoons, evenings and on Saturday. In addition to the exhibitions, workshops were held for business groups and community associations. Officers were invited to meetings of the Milton Neighbourhood Forum and Portsmouth Fabian Society and attended to discuss the consultation. Finally, officers met counterparts from neighbouring planning authorities.

4. Arrangements were made for representations on the Local Plan and associated documents to be submitted on-line, by email and by letter with the option of using a consultation form that could be downloaded from the Council's website or supplied by the Planning Policy Team.

Step 4 - What's the impact?

Is there an impact on some groups in the community? (think about race, gender, disability, age, transgender, religion or belief, sexual orientation, pregnancy and maternity and other socially excluded communities or groups)

Generic information that covers all equality strands (Optional)

A total of 302 individuals and organisations responded to the consultation. This compares to an estimated total population of 210,000 individuals.

The consultation has been prepared to capture the views of people across the city to issues and options in the Local Plan. Options were presented as a way of informing that discussion, but it is the case that the final Plan will take into account of a range of factors, including technical evidence, national legislation and regulations. The responses to this consultation have been used to consider any significant differences in the responses made by persons of different characteristics.

The equalities data of those individuals who provided it, compared to the known breakdown in the city, is as follows:

Ethnicity or race

196 respondents provided this information. The breakdown of respondents compared to the city wide total is as follows -

White British - 84.00% ONS and HCC data - 90.31% 177 I&O responses
 White Irish - 0.50% ONS and HCC data - 0.51% 1 I&O responses
 Other White Background - 3.80% ONS and HCC data - 4.59% 9 I&O responses
 Mixed White & Asian - 1.20% ONS and HCC data - 1.53% 3 I&O responses
 Other Mixed Background - 0.50% ONS and HCC data - 1.02% 2 I&O responses
 Indian - 1.40% ONS and HCC data - 0.51% 1 I&O responses
 Bangladeshi - 1.80% ONS and HCC data - 1.02% 2 I&O responses
 Other Asian Background - 1.30% ONS and HCC data - 0.51% 1 I&O responses

Therefore in general the ethnicity or race of those who responded to the consultation and gave their personal information broadly matches the known profile of the city population as a whole. However Indian, Bangaldeshi and other Asian background communities were underrepresented.

Because the number of persons who provided information on ethnicity or race was quite low, and the numbers of individual responses for some characteristics was quite low, analyzing the responses by ethnicity or race is quite difficult. However, it is worth noting that the issues commented upon most by those who identified as having a BME background were the overall Vision for the Plan; the proposed Objectives; Health issues; and retail policy.

Gender including transgender

207 respondents provided this information. The breakdown of respondents compared to the city wide total is as follows -

Male - 50.30% ONS and HCC data - 49.76% 103 I&O responses

Female - 49.70% ONS and HCC data - 50.24% 104 I&O responses

Therefore in general the gender of those who responded to the consultation and gave their personal information broadly matches the known profile of the city population as a whole.

However, certain issues covered by the consultation saw responses provided more by one gender than the other. Those issues where the respondents who provided data were predominantly (i.e. more than 65%) male were Heritage, Design and the Built Environment; the natural environment; employment requirements; retail requirements; Lakeside; and Somerstown.

By contrast, there were no issues where the total responses were predominantly made by women to the same extent. The issues where responses by women formed the greatest proportion were Housing; Regeneration and the Local Economy; and North End (55-56% in all cases).

Age

202 respondents provided this information. The breakdown of respondents compared to the city wide total is as follows -

0-15 - 17.32% ONS and HCC data - 0% 0 I&O responses

16-24 - 18.88% ONS and HCC data - 2.97% 6 I&O responses

25-34 - 15.05% ONS and HCC data - 14.85% 30 I&O responses

35-44 - 13.49% ONS and HCC data - 18.32% 37 I&O responses

45-54 - 12.57% ONS and HCC data - 21.29% 43 I&O responses

55-64 - 9.33% ONS and HCC data - 18.32% 37 I&O responses

65-74 - 6.76% ONS and HCC data - 21.29% 43 I&O responses

75+ - 6.61% ONS and HCC data - 2.97% 6 I&O responses

Those who responded to the consultation and gave their personal information covered a range of ages. Those under 25 were poorly represented. With the exception of those over 75, older groups were over represented.

Persons from different age groups chose to respond to some issues more than others. People aged 18-34 were more likely to respond on the Vision and Objectives; Housing; Tall buildings; and North End. People aged 35-64 made a proportionately greater number of responses to the issues of Retail and the City Centre; Regeneration and the Local Economy; Health, Well being and Open Space; Other Planning Issues including Flooding; or make other comments about the consultation. People aged 65+ made a proportionately greater number of responses for many issues but in particular Retail requirements; and Cosham.

Disability

199 respondents - 7% have a long-term health problem or disability that limits their day-to-day activities. The breakdown of respondents who provided this information is as follows -

Yes - 8.04% 16 I&O responses

No - 91.96% 183 I&O responses

Therefore in general the proportion of those people who responded to the consultation and gave their personal information broadly matches the known profile of the city population as a whole.

Because the number of respondents who advised that they had a disability was quite low, analyzing the responses by people with that characteristic is quite difficult. However, it is worth noting that the issues commented upon most by those who considered themselves to have a disability were Retail and the City Centre; The overall Vision and Objectives; Tipner; and the Seafront.

Religion or belief

No specific issues have been raised with regard to religion or belief in the consultation results. It is not envisaged that the Local Plan Issues and Options changes will have a negative impact due to religion or belief. We do not collect this equality data.

Sexual orientation

No specific issues have been raised with regard to sexual orientation in the consultation results. It is not envisaged that the Local Plan Issues and Options will have a negative impact due to sexual orientation.

Pregnancy and maternity

No specific issues have been raised with regard to pregnancy and maternity in the consultation results. It is not envisaged that the Local Plan Issues and Options will have a negative impact due to pregnancy and maternity. Unknown as currently no data held.

Other socially excluded groups or communities e.g. carers, areas of deprivation, low literacy skills

The addresses provided by respondents was aggregated to provide an overview of what part of the city they lived in. The results by postcode were as follows -

PO1 - roughly corresponding to Charles Dickens, Fratton and part of St Thomas wards - 32 responses

PO2 - roughly corresponding to Nelson, and parts of Hilsea and Copnor wards - 27 responses

PO3 - roughly corresponding to Baffins, and parts of Copnor and Hilsea wards - 20 responses

PO4 - roughly corresponding to Milton, Eastney and Craneswater, and Central Southsea and parts of Baffins wards - 93 responses

PO5 - roughly corresponding with St Jude, part of St Thomas Ward - 34 responses

PO6 - roughly corresponding with Drayton and Farlington, Cosham, and Paulsgrove wards - 29 responses

PO7 - north of the city - 1 response

All postcodes contain areas with varying characteristics and communities. However, broadly speaking, the areas which rank most highly on the government's Indices of Multiple Deprivation fall in postcodes PO1, PO2 and PO6. The number of responses from addresses within those postcodes was not significantly lower than those from other parts of the city, providing some evidence that those communities were not as a whole excluded from the consultation. The disparity between the number of responses received from different postcode areas is thought more likely to be due to concerns expressed by residents in the PO4 postcode about issues such as St James and Langstone, the seafront and concerns over development at Frasers Range and the Caravan park.

Health Impact

Have you referred to the Joint Needs Assessment (www.jsna.portsmouth.gov.uk) to identify any associated health and well-being needs?

☒ Yes ☐ No

What are the health impacts, positive and / or negative? For example, is there a positive impact on enabling healthier lifestyles or promoting positive mental health? Could it prevent spread of infection or disease? Will it reduce any inequalities in health and well-being experienced by some localities, groups, ages etc? On the other hand, could it restrict opportunities for health and well-being?

Although no decisions for the new Local Plan have yet been taken, the development strategy has the potential for a range of impacts upon health and wellbeing. To inform the future selection of a strategy, technical work has been commissioned on the following aspects -

Air Quality and transport;

The quality, quantity and accessibility of open space to all communities;

Playing pitch assessment;

Transport work to encourage walking and cycling;

Infrastructure planning to coordinate funding, phasing and delivery of social and environmental infrastructure;

Assessment of need for specialist housing, including for older persons, those with mobility issues or other needs.

Health inequalities are strongly associated with deprivation and income inequalities in the city. Have you referred to Portsmouth's Tackling Poverty Needs Assessment and strategy (available on the JSNA website above), which identifies those groups or geographical areas that are vulnerable to poverty? Does this have a disproportionately negative impact, on any of these groups and if so how? Are there any positive impacts?, if so what are they?

The consideration of responses from various parts of the city is set out earlier in this assessment. The proposals for parts of the city centre in particular, given their proximity to some of the city's more deprived communities, has the potential to impact upon those communities quite significantly. The responses from Portsmouth's Tackling Poverty Action Group have been highlighted in the summary of the responses received and considered carefully for how the new Local Plan can make a positive difference.

Step 5 - What are the differences?

Are any groups affected in a different way to others as a result of your policy, service, function, project or strategy?

At this stage no decisions have been taken on the future Local Plan. There is the potential for specific groups to be affected, particularly with regards to the type of housing sought in the future development in the city. In particular this could affect older persons and those with disabilities, although other groups may be affected. This will need to be considered in the forthcoming technical work on the various components of housing need.

Does your policy, service, function, project or strategy either directly or indirectly discriminate?

☐ Yes ☒ No

If you are either directly or indirectly discriminating, how are you going to change this or mitigate the negative impact?

Not applicable

Step 6 - Make a recommendation based on steps 2 - 5

If you are in a position to make a recommendation to change or introduce the policy, service, project or strategy clearly show how it was decided on

The recommendation is to continue with the technical work to inform the new Local Plan. Individual projects, such as the assessments of types of housing need and the quality, quality and accessibility of open space, should be undertaken with interests of groups taken into account.

What changes or benefits have been highlighted as a result of your consultation?

The particular interest given by various groups to the various issues and options consultation will help all parties to understand the context within, and the message set out, in the consultation responses. This will assist in understanding the qualitative nature of the consultation responses.

The relatively poor responses by young groups in particular, as well as those over 75, will be considered more fully and future planning consultation work will address how those groups may better engage with the Local Plan project.

If you are not in a position to go ahead what actions are you going to take?

(Please complete the fields below)

Action	Timescale	Responsible officer

How are you going to review the policy, service, project or strategy, how often and who will be responsible?

Future reports prepared on the Local Plan process will include EqlA assessments to inform the process.

Step 7 - Now just publish your results

This EIA has been approved by:

Contact number:

Date:

Please email a copy of your completed EIA to the Equality and diversity team. We will contact you with any comments or queries about your full EIA.

Telephone: 023 9283 4789

Email: equalities@portsmouthcc.gov.uk

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Agenda Item 6

Agenda item:

Decision maker: Cabinet 11th December 2017

Subject: Revenue Budget Monitoring 2017/18 (2nd Quarter) to end September 2017

Report by: Director of Finance & Information Technology

Wards affected: All

Key decision (over £250k): Yes

1. Purpose of Report

- 1.1 The purpose of this report is to update members on the current Revenue Budget position of the Council as at the end of the second quarter for 2017/18 in accordance with the proposals set out in the "Portsmouth City Council - Budget & Council Tax 2017/18 & Medium Term Budget Forecast 2018/19 to 2020/21" report approved by the City Council on the 14th February 2017.

2. Recommendations

- 2.1 It is recommended that:

- (i) The forecast outturn position for 2017/18 be noted:
 - (a) An underspend of £2,459,200 before further forecast transfers from/(to) Portfolio Specific Reserves & Ring Fenced Public Health Reserve
 - (b) An underspend of £1,035,500 after further forecast transfers from/(to) Portfolio Specific Reserves & Ring Fenced Public Health Reserve.
- (ii) Members note that any actual overspend at year end will in the first instance be deducted from any Portfolio Specific Reserve balance and once depleted then be deducted from the 2018/19 Cash Limit.
- (iii) Directors, in consultation with the appropriate Cabinet Member, consider options that seek to minimise any forecast overspend presently being reported and prepare strategies outlining how any consequent reduction to the 2018/19 Portfolio cash limit will be managed to avoid further overspending during 2018/19.

3. Background

- 3.1 A Budget for 2017/18 of £161,643,000 was approved by City Council on the 14th February 2017. This level of spending enabled a contribution to General Reserves of £0.58m since in year income exceeds in year spending.

3.2 Since the 14th February City Council meeting, the Council has been allocated additional one off non ring-fenced grants totalling £361,500 in 2017/18, In order to achieve the government's priorities in these areas, service budgets have been adjusted as appropriate. Following the Spring Budget announcement of 8th March 2017 three year ring fenced funding for Adult Social Care of £3,997,300 in 2017/18, £2,537,700 in 2018/19 and £1,258,200 in 2019/20 has been granted. As the grant is ring fenced the grant income is reported within the Health & Social Care Portfolio along with the associated expenditure and therefore does not affect the Councils overall net budget.

3.3 In summary, changes to the budget as approved on 14th February 2017 are as follows:

	£
Budget Approved 14th February 2017	161,643,000
Brownfield Sites - New Burdens	14,600
War Pensions Scheme Disregard	88,000
Individual Electoral Registration	57,200
Education Innovation Fund - Staying Close	201,700
Adjusted 2017/18 Budget	162,004,500

3.4 Once the above budget changes are taken into account, the Budget (as adjusted) for 2017/18 has increased to £162,004,500. After the additional non ring fenced grant funding is taken into account this results in an overall contribution to General Reserves of £0.6m for 2017/18 (i.e. assuming no overall budget variance).

3.5 This is the second quarter monitoring report of 2017/18 and reports on the forecast 2017/18 outturn as at the end of September 2017. The forecasts summarised in this report are made on the basis that management action to address any forecast overspends are only brought in when that action has been formulated into a plan and there is a high degree of certainty that it will be achieved.

3.6 Any variances within Portfolios that relate to windfall costs or windfall savings will be met / taken corporately and not generally considered as part of the overall budget performance of a Portfolio. "Windfall costs" are defined as those costs where the manager has little or no influence or control over such costs and where the size of those costs is high in relation to the overall budget controlled by that manager. "Windfall costs" therefore are ordinarily met corporately from the Council's central contingency. A manager / Cabinet Member however, does have an obligation to minimise the impact of any "windfall cost" from within their areas of responsibility in order to protect the overall Council financial position. Similarly, "windfall savings" are those savings that occur fortuitously without any manager action and all such savings accrue to the corporate centre.

3.7 The Financial summary attached at Appendix A has been prepared in Portfolio format and is similar in presentation, but not the same as, the more recognisable "General Fund Summary" presented as part of the Budget report approved by Council on 14th February 2017. The format presented at Appendix A has been amended to aid understandability for monitoring purposes by excluding all non cash items which have a neutral effect on the City Council's budget such as Capital Charges. In addition to this, Levies and Insurances are shown in total and have therefore been separated from Portfolios to also provide greater clarity for monitoring purposes.

4 Forecast Outturn 2017/18 – As at end September 2017

4.1 At the second quarter stage, the revenue outturn for 2017/18 after further forecast transfers from/to Portfolio Specific Reserves (Underspends are retained by right) is forecast to be underspent by £1,035,500 representing an overall budget variance of 0.6%.

4.2 The quarter 2 variance consists of a number of forecast under and overspends.

The most significant overspendings at the quarter 2 stage are:

Quarter 1 Forecast Variance		Quarter 2 Forecast Variance	Quarter 2 Forecast Variance (After Transfers From Portfolio Reserves)
£		£	£
2,828,700	Children's Social Care	2,366,700	2,366,700
133,000	Culture Leisure & Sport		
1,431,000	Health & Social Care	758,100	894,700
125,400	Traffic & Transportation		

These are offset by the following significant forecast underspends at the quarter 2 stage:

Quarter 1 Forecast Variance		Quarter 2 Forecast Variance	Quarter 2 Forecast Variance (After Transfers To Portfolio Reserves)
£		£	£
418,300	Environment & Community Safety	388,400	Nil
231,000	Planning, Regeneration & Economic Development	476,100	481,300
680,600	Port	475,200	Nil
333,500	Resources	525,900	Nil
2,411,100	Treasury Management	2,508,600	2,508,600
2,054,000	Other Miscellaneous Expenditure	1,254,000	1,254,000

5 Quarter 2 Significant Budget Variations – Forecast Outturn 2017/18

5.1 Children's Social Care – Overspend £2,366,700 (or 9.8%) or After Transfer From Portfolio Reserve £2,366,700 (9.8%)

The cost of Children's Social Care is forecast to be £2,366,700 higher than budgeted.

The overspend is primarily related to higher costs and numbers of child placements (£2,762,000) offset by reduced staffing costs due to staff turnover and the holding of posts vacant (£395,400).

Of the £2.4m forecast overspending in 2017/18, £1.8m relates to an underlying budget deficit within the Portfolio. Proposals to minimise the current underlying deficit were considered by Cabinet on 29th June 2017 and an increase in social work capacity was approved. Proposals to eliminate any deficit arising in 2018/19 are currently being developed in conjunction with the budget setting process.

5.2 Health and Social Care – Overspend £758,100 (1.8%) or After Transfer to Public Health Reserve £894,700 (2.1%)

The cost of Health and Social Care is forecast to be £758,100 higher than budgeted.

The key variances are:

- The cost of Public Health is forecast to be £136,600 lower than budgeted as a result of staff vacancies. This underspending will be transferred to the ring fenced Public Health Reserve.
- Increased demand for Learning Disability, Deprivation of Liberty (DoLs) assessments and delays in the moving of clients with mental issues from residential homes to more independent settings (£894,700).

Whilst an overspend of £758,100 is forecast in 2017/18, this is after adjusting for cost reductions that will not arise in future years. As a consequence the underlying deficit within Adult Social Care is forecast to have increased from £1.2m as at quarter 1 to £1.8m as at quarter 2. Proposals to minimise the current underlying deficit and to eliminate any deficit arising in 2018/19 are currently being formulated.

5.3 Environment and Community Safety – Underspend £388,400 (2.7%) or After Transfer To Portfolio Reserve Nil

The cost of Environment and Community Safety is forecast to be £388,400 lower than budgeted.

Following a comprehensive service review within the Refuse Collection Service forecast savings totalling £97,600 have been identified.

A reduction in Waste Disposal costs totalling £296,000 is currently forecast as a result of the part year effect of an amendment to the operator's contract and the final settlement of the 2016/17 profit share in respect of the Materials Recycling Facility (MRF).

5.4 Planning, Regeneration and Economic Development – Underspend £476,100 (6.2%) or After Transfer From Portfolio Reserve and Windfall Items £481,300 underspend (6.3%)

The cost of Planning, Regeneration and Economic Development is forecast to be £476,100 lower than budgeted.

The underspending is primarily as a result of windfall rental income of £481,300 arising from the Commercial Property Portfolio.

5.5 Port – Underspend £475,200 (6.1%) or After Transfer To Portfolio Reserve Nil

Overall net income from the Port is forecast to be £475,200 above target income.

Increased throughput at the port has resulted in higher income from ferry operators and as a result of recent dredging undertaken by Portsmouth Naval Base, income from pilotage acts has also increased.

5.6 Resources – Underspend £525,900 (2.8%) or After windfall items and Transfer To Portfolio Reserve £65,000 (0.4%) underspend

The cost of Resources is forecast to be £525,900 lower than budgeted.

The underspend is primarily as a result of posts being held vacant in preparation for future savings requirements, along with difficulties recruiting to posts, coupled with increased traded services income within HR, Audit and Payroll.

5.7 Treasury Management – Underspend £2,508,600 (or 11.2%)

This budget funds all of the costs of servicing the City Council's long term debt portfolio that has been undertaken to fund capital expenditure. It is also the budget that receives all of the income in respect of the investment of the City Council's surplus cash flows. As a consequence, it is potentially a very volatile budget particularly in the current economic climate and is extremely susceptible to both changes in interest rates as well as changes in the Council's total cash inflows and outflows.

The forecast underspend relates to:

The cost of borrowing taken in advance of need, to take advantage of exceptionally low interest rates, has now been applied to finance the recently acquired investment properties and has resulted in an overall lower than anticipated cost of financing those acquisitions and therefore an overall increase in net return (£2,091,200). This improvement however, is offset by a lower HRA borrowing requirement resulting in a larger proportion of total borrowing costs falling on the General Fund (693,000).

Investment income is expected to be £1,138,500 higher than originally budgeted as a result of a temporary improvement in investment returns.

5.8 Other Miscellaneous Expenditure - Underspend £1,254,000

Contingency - Planned Release £2,054,000

As outlined above, Adults and Children's Social Care are presently forecast to overspend by £3,261,400 (after transfers to reserves). Some of this forecast overspending may be mitigated by action plans currently under development; however it is unlikely that these Portfolio's will be able to contain this level of overspending within their current cash limits. The contingency had been deliberately prepared to guard against the risk that some of the savings proposals of these Services may not be fully achievable. The amount of contingency that can be estimated to be releasable at this stage for this purpose is £2,054,000.

MMD - Overspend £800,000

After making a profit in 2016/17 the council owned company has experienced the loss of a customer who has moved their operation to a different port. As a result, the company is now not expected to generate a profit in 2017/18 but is expected to return to profit in 2018/19.

5.9 All Other Budget Variations – Overspend £44,200 or After Transfers Form/To Portfolio Reserves Overspend £12,000

All variations are summarised in Appendix A

6. **Transfers From/To Portfolio Specific Reserves**

In November 2013 Full Council approved the following changes to the Council's Budget Guidelines and Financial Rules:

- Each Portfolio to retain 100% of any year-end underspending and to be held in an earmarked reserve for the relevant Portfolio
- The Portfolio Holder be responsible for approving any releases from their reserve in consultation with the Section 151 Officer
- That any retained underspend (held in an earmarked reserve) be used in the first instance to cover the following for the relevant portfolio:
 - i. Any overspendings at the year-end
 - ii. Any one-off Budget Pressures experienced by a Portfolio
 - iii. Any on-going Budget Pressures experienced by a Portfolio whilst actions are formulated to permanently mitigate or manage the implications of such on-going budget pressures
 - iv. Any items of a contingent nature that would historically have been funded from the Council's corporate contingency provision
 - v. Spend to Save schemes, unless they are of a scale that is unaffordable by the earmarked reserve (albeit that the earmarked reserve may be used to make a contribution)

- Once there is confidence that the instances i) to v) above can be satisfied, the earmarked reserve may be used for any other development or initiative

The forecast balance of each Portfolio Specific Reserve that will be carried forward into 2018/19 is set out below:

Portfolio/Committee Reserve	Balance Brought Forward £	Approved Transfers 2017/18 £	Forecast Under/ (Over) Spending £	Balance Carried Forward £
Children's Social Care	83,700	(83,700)	0	0
Culture, Leisure & Sport	547,800	(127,600)	(4,100)	416,100
Education	210,700	(136,800)	(73,900)	0
Environment & Community Safety	1,504,100	(171,400)	388,400	1,721,100
Health & Social Care	0	0	0	0
Housing	848,300	0	(9,600)	838,700
Leader	46,900	0	0	46,900
PRED	134,500	(24,700)	(5,200)	104,600
Port	2,561,200	625,000	475,200	3,661,400
Resources	1,240,000	(403,100)	460,900	1,297,800
Traffic & Transportation	306,400	(46,500)	70,300	330,200
Licensing	138,600	0	0	138,600
Governance, Audit & Standards	367,500	0	(14,900)	352,600
Total	7,989,700	(368,800)	1,287,100	8,908,000

Note: Releases from Portfolio Reserves to fund overspending cannot exceed the balance on the reserve

7. Conclusion - Overall Finance & Performance Summary

- 7.1 The overall forecast outturn for the City Council in 2017/18 as at the end of September 2017 is forecast to be £160,969,000. This is an overall underspend of £1,035,500 against the Amended Budget and represents a variance of 0.6%.
- 7.2 The forecast takes account of all known variations at this stage, but only takes account of any remedial action to the extent that there is reasonable certainty that it will be achieved.
- 7.3 The overall financial position is deemed to be "green" since the forecast outturn is lower than budget.
- 7.4 In financial terms, the forecast overspend within the Children's Social Care and Health & Social Care Portfolios represent the greatest concerns in terms of the impact that they have on the overall City Council budget for 2017/18. The £3.3m forecast overspending (after transfers from reserves) relating to these areas in 2017/18 is forecast to rise to £3.6m in future years and therefore represents their combined underlying deficits. This is a significant deterioration in the underlying stability of these budgets compared to 2016/17. Consequently, it is recommended that Directors continue to work with the relevant portfolio holder to consider measures to significantly reduce or eliminate the adverse budget position presently being forecast by these

Portfolios, and any necessary decisions presented to a future meeting of the relevant Portfolio.

- 7.5 In terms of the overall budget position for 2017/18, the Council has set aside funding within the Contingency Provision to guard against potential overspending. So, whilst the forecast of overspending within some portfolios in the current year can be mitigated to a large extent, the underlying deficit will need to be addressed in 2018/19.
- 7.6 Where a Portfolio is presently forecasting a net overspend in accordance with current Council policy, any overspending in 2017/18 which cannot be met by transfer from the Portfolio Specific Reserve will be deducted from cash limits in 2018/19 and therefore the appropriate Directors in consultation with Portfolio Holders should prepare an action plan outlining how their 2017/18 forecast outturn or 2018/19 budget might be reduced to alleviate the adverse variances currently being forecast.
- 7.7 Based on the Budget (as adjusted) of £162,004,500 the Council will remain within its minimum level of General Reserves for 2017/18 of £7.0m as illustrated below:

	<u>£m</u>
General Reserves brought forward @ 1/4/2017	19.256
<u>Add:</u>	
Forecast Underspend 2017/18	1.036
<u>Add:</u>	
Planned Contribution to General Reserves 2017/18	0.597
Forecast General Reserves carried forward into 2018/19	20.889

Levels of General Reserves over the medium term are assumed to remain within the Council approved minimum sum of £7.0m in 2017/18 and future years since any ongoing budget pressures / savings will be reflected in future years' savings targets.

8. City Solicitor's Comments

- 9.1 The City Solicitor is satisfied that it is within the Council's powers to approve the recommendations as set out.

9. Equalities Impact Assessment

- 10.1 This report does not require an Equalities Impact Assessment as there are no proposed changes to PCC's services, policies, or procedures included within the recommendations.

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Chris Ward
Director of Finance & Information Service

Background List of Documents –

Section 100D of the Local Government Act 1972

The following documents disclose facts or matters which have been relied upon to a material extent by the author in preparing this report –

Title of Document	Location
Budget & Council Tax 2017/18 & Medium Term Budget Forecast 2018/19 to 2020/21	Office of Deputy Director of Finance
Electronic Budget Monitoring Files	Financial Services Local Area Network

The recommendations set out above were:

Approved / Approved as amended / Deferred / Rejected by the Cabinet on 11th December, 2017

Signed:

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FINANCIAL AND SERVICE PERFORMANCE MONTH ENDING SEPTEMBER 2017

Appendix A

MONTHLY BUDGET MONITORING STATEMENT - CASH LIMIT 2017/18

PORTFOLIO City Council General Fund

BUDGET Total General Fund Expenditure

TOTAL CASH LIMIT 162,004,500

CHIEF OFFICER All Budget Holders

MONTH ENDED September 2017

ITEM No.	BUDGET HEADING	BUDGET FORECAST 2017/18			
		Total Budget	Forecast Year End Outturn	Variance vs. Total Budget	
		£	£	£	%
1	Children's Social Care	24,099,000	26,465,700	2,366,700	9.8%
2	Culture, Leisure & Sport	5,401,600	5,405,700	4,100	0.1%
3	Education	5,515,100	5,601,000	85,900	1.6%
4	Environment & Community Safety	14,199,700	13,811,300	(388,400)	(2.7%)
5	Health & Social Care	42,536,900	43,295,000	758,100	1.8%
6	Housing	3,296,700	3,306,300	9,600	0.3%
7	Leader	124,200	124,200	0	0.0%
8	PRED	(7,663,500)	(8,139,600)	(476,100)	(6.2%)
9	Port	(7,751,500)	(8,226,700)	(475,200)	(6.1%)
10	Resources	18,550,700	18,024,800	(525,900)	(2.8%)
11	Traffic & Transportation	15,974,300	15,904,000	(70,300)	(0.4%)
12	Licensing Committee	(232,400)	(232,400)	0	0.0%
13	Governance, Audit & Standards Com	98,100	113,000	14,900	15.2%
14	Levies	83,400	83,400	0	0.0%
15	Insurance	1,325,400	1,325,400	0	0.0%
16	Treasury Management	22,393,400	19,884,800	(2,508,600)	(11.2%)
17	Other Miscellaneous	24,053,400	22,799,400	(1,254,000)	(5.2%)
TOTAL		162,004,500	159,545,300	(2,459,200)	(1.5%)

Total Value of Remedial Action (from Analysis Below)

0

Forecast Outturn After Remedial Action 162,004,500 159,545,300 (2,459,200) (1.5%)

Forecast Transfers To Portfolio Specific Reserves

1,287,100

Forecast Transfer (From)/To Ring Fenced Public Health Reserve

136,600

Forecast Outturn After Transfers (From)/To Portfolio Specific Reserves 162,004,500 160,969,000 (1,035,500) (0.6%)

Note All figures included above exclude Capital Charges

Income/underspends is shown in brackets and expenditure/overspends without brackets

VALUE OF REMEDIAL ACTIONS & TRANSFERS (FROM)/TO PORTFOLIO SPECIFIC RESERVES

Item No.	Reason for Variation	Value of Remedial Action	Forecast Portfolio Transfers
1	Children's Social Care	0	0
2	Culture, Leisure & Sport	0	(4,100)
3	Education	0	(73,900)
4	Environment & Community Safety	0	388,400
5	Health & Social Care	0	0
6	Housing	0	(9,600)
7	Leader	0	0
8	PRED	0	(5,200)
9	Port	0	475,200
10	Resources	0	460,900
11	Traffic & Transportation	0	70,300
12	Licensing Committee	0	0
13	Governance, Audit & Standards Com	0	(14,900)
14	Levies	0	
15	Insurance	0	
16	Asset Management Revenue Account	0	
17	Other Miscellaneous	0	
Total Value of Remedial Action		0	1,287,100

Note Remedial Action resulting in savings should be shown in brackets

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Agenda Item 7



Agenda item:

Decision maker: Cabinet
City Council

Subject: Portsmouth City Council Revenue Budget 2018/19 -
Savings Proposals

Date of decision: 11th December 2017 (Cabinet)
12th December 2017 (City Council)

Report by: Director of Finance & Information Services (Section 151
Officer)

Wards affected: All

Key decision: Yes

Budget & policy framework decision: Yes

1. Executive Summary

- 1.1 The austerity programme to repair the national public finances has been in place now for 7 years. Over that period, since 2011/12, Central Government funding to Portsmouth City Council has reduced by over £73m (amounting a 48% reduction in total Government Funding). Taken together with other financial pressures that have been experienced by the City Council (mainly relating to inflation, the effects of an ageing population on care services and the increased requirements for the safeguarding of vulnerable children), the City Council has had to make overall savings over the same period of £94m, representing circa 44% of the Council's net controllable spending.
- 1.2 The forecast for the national public finances set out in the Autumn Budget recently are expected to improve for this financial year and next year and then worsen over the subsequent 3 years compared with the Spring 2017 projections. The worsening position is largely due to the lower forecasts of growth over the period to 2021/22. The Autumn Budget has left Government Departmental Spending limits unaltered, implying that the 4 year Local Government Finance Settlement that the City Council has accepted will remain intact. Additional revenue funding of £2.8bn has been announced for the NHS but it is expected that this will stay within the NHS rather than being available to support Local Authorities' Social Care budgets.

- 1.3 The announcements in the Autumn Budget are not expected to materially alter the Council's expected revenue funding from Central Government however other factors such as inflation generally, the increasing elderly population and the increase in the National Living Wage (4.4%) may impact on the Council's forecasts for future years beyond 2018/19.
- 1.4 Other variables that form part of the Council's overall financial forecasts remain uncertain such as the amount of retained business rates that will be achievable and the amount of Council Tax that will be received.
- 1.5 At this stage, pending a comprehensive revision of the Council's medium term financial forecasts in February 2018, it remains prudent to plan for a minimum savings requirement for 2018/19 of £4m. However, as a consequence of the consultations and variables described above, future years' savings forecasts for 2019/20 and beyond may change from the £4m per annum currently forecast.
- 1.6 The proposed 2018/19 savings amounting to £4m have been developed in accordance with the Medium Term Financial Strategy and with full regard to the Budget Consultation exercise. The overall aim of the Strategy is described as follows:
- "In year" expenditure matches "in year" income over the medium term whilst continuing the drive towards regeneration of the City, being entrepreneurial and protecting the most important and valued services*
- 1.7 Budget consultations in previous years agreed that income generation should be pursued as an alternative to cuts, that joint working was welcomed and that services to vulnerable adults and children should be protected. This year's consultation has re-affirmed that services to vulnerable adults and children should be protected but has clearly identified "Rubbish and Recycling" as their first priority. This was followed in priority order by Children's Social Care, then Adult Social Care and then Maintenance and Seafront.
- 1.8 Additionally, a majority of respondents (73%) indicated that they would accept a Council Tax increase for general purposes of 2% or more (with the largest category of residents indicating that they would accept a 4% increase). 50% of respondents also indicated that they would accept an additional increase to support vulnerable residents (i.e. the Adult Social Care Precept).

- 1.9 In accordance with the Medium Term Financial Strategy and the outcome of the Budget Consultation, the Administration's proposals for the £4m Budget Savings for 2018/19 are summarised as follows:

- (i) Savings analysis:

Description of Saving	Savings	
Efficiency Savings (little or no reduction in Services)	£2.4m	60%
Additional Income	£1.4m	36%
Service Reduction	£0.2m	4%
Total	£4.0m	100%

- (ii) No savings from Children's Social Care
- (iii) Adult Social Care Services amounting to 1.6% of their budget compared with the average saving across all services of 2.1%
- (iv) A proposed Council Tax increase of 1.99% for general purposes
- (v) A further increase in Council Tax amounting to 3.0% in total, phased in over 2018/19 and 2019/20, specifically for Adult Social Care
- 1.10 Following the re-launch of the Voluntary Sector Capacity & Transition Fund aimed at improving the sustainability of the voluntary sector, assisting in building capacity and supporting any necessary transformation, the fund is now almost fully subscribed. The use of the fund and its expected outcomes are anticipated to be successful and the Administration propose to make a further transfer from the MTRS Reserve of £500,000 to continue to support the development of the Voluntary Sector in the City but importantly to also encourage and incentivise innovation between the Council and the Sector.
- 1.11 Whilst the savings proposals for 2018/19 are considered realistic, they are not without risk and the Council's Contingency and Portfolio Reserves will be carefully prepared to provide strong mitigation. Additionally, Children's and Adults Social Care will still have to address underlying deficits of £1.8m and £1.8m, respectively.
- 1.12 For Children's Social Care, a plan is in place to reduce that deficit and no savings are proposed from Children's Social Care for 2018/19 whilst the deficit reduction measures are in place.
- 1.13 For Adults Social Care (ASC), the funding received via the ASC Precept plus the transformation initiatives funded by the improved Better Care Fund Allocation (amounting to £7.8m for the period 2017/18 to 2019/20) is planned to be used to remedy the underlying deficit and meet the demographic cost pressures facing the service.
- 1.14 Looking forward beyond 2018/19 still with significant savings to be made, the Council will need to focus its strategy on entrepreneurial activities and

regeneration if it is to avoid significant cuts to Services. The alternative is to rely more heavily on efficiency savings and service cuts which would inevitably fall heavily on Children's Social Care and Health & Social Care since these areas, in aggregate, account for 53% of the Council's total controllable spending.

- 1.15 Approval of the proposals within this report will maintain the Council's financial health and resilience and its ability to respond in a measured and proportionate way to any "financial shocks" as well as having sufficient financial capacity to exploit opportunities as they arise.
- 1.16 The proposals within this report are a necessary pre-cursor to the Annual Budget and Council Tax Setting meeting of the 13th February 2018 when the Council will be requested to formally approve the Budget for 2018/19 and the associated Council Tax for the year. Should the savings proposals contained within this report be approved, they will form the basis of the Budget for 2018/19 presented to Council. That report will also include a comprehensive revision of the Council's future financial forecasts and set the consequent future savings requirements for the period 2019/20 to 2021/22.

2 Purpose of Report

- 2.1 The report describes the financial challenge facing the City Council for the three years 2018/19 to 2020/21 and the likely implications for Council services to businesses and residents. It also describes, in overall terms, the way in which the Administration will seek to address this challenge through its Medium Term Financial Strategy, described as follows:

OVERALL AIM

"In year" expenditure matches "in year" income over the medium term whilst continuing the drive towards regeneration of the City, being entrepreneurial and protecting the most important and valued

- 2.2 The report sets out the need to find £12m of savings over the next three years with a minimum of £4m to be made in 2018/19 (assuming a 1.99% increase in Council Tax for general purposes and a total of a 3.0% increase for the ASC Precept phased over 2018/19 and 2019/20). It recommends the level of savings to be made across Portfolios and other activities in 2018/19 consistent with both the outcomes of the recent budget consultation exercise and the overall financial strategy. The appendices highlight the likely savings proposals and implications associated with the overall Portfolio savings levels proposed.
- 2.3 Also proposed within this report is the intention to replenish the Voluntary Sector Capacity & Transition Fund to ensure continued support for the development of secure and sustainable voluntary sector services in the future.
- 2.4 Finally, the report stresses the important contribution that the MTRS Reserve and the Capital Programme can make to the Council's overall Medium Term Financial Strategy. The General Fund Revenue Budget is the most constrained of all Council budgets and the sustainability of Council Services will be better protected if both MTRS funds and the Capital programme are directed towards generating savings or raising income.
- 2.5 This report is being brought at this time to provide greater opportunity for any necessary consultation, notice and other lead-in times to take place prior to implementation in order that full year savings can be made. Should approval of the savings be considered at a later date, a greater number or deeper savings will be required in order to compensate for any delay in implementation.

2.6 In particular, this report explains:

- (a) In broad terms the challenge for the City in the current economic climate
- (b) The general financial constraints on the City Council both currently and in future years
- (c) The Council's Medium Term Financial Strategy
- (d) Where underlying budget deficits currently exist and how these will be managed
- (e) A change to the Council's Authorised Limit for External Debt arising from the premium paid to the Council in respect of the lease of Wightlink
- (f) Key assumptions built into the City Council's forecasts for 2018/19 to 2020/21 which give rise to a forecast £12m deficit over the period and which include:
 - i. Revenue Support Grant
 - ii. Other Non-ring fenced grants
 - iii. Business Rates
 - iv. Council Tax yield
 - v. Inflation and interest rates
- (g) The level of uncertainty surrounding future years funding sources from Council Tax, Business Rates and Government Grant and the extent to which this could affect the forecast £12m deficit over the period
- (h) The Medium Term Financial Strategy aimed at meeting the Council's core aim whilst addressing the forecast £12m deficit
- (i) The key themes arising from the budget consultation that took place over the October / November period to assist Members in their consideration over the level and nature of savings to be made across Portfolios
- (j) In the context of the Medium Term Financial Strategy and the Budget Consultation, the proposed savings amount for each Portfolio / Committee to be made in 2018/19
- (k) The detailed indicative savings (Appendix B) that could be made by each Portfolio / Committee in meeting its overall savings amount in order to provide the Council with the assurance necessary to approve the recommended savings amount for each Portfolio / Committee
- (l) The need to agree the Portfolio / Committee savings amounts at this early stage in order that any necessary consultation, notice periods or other lead times can commence in order to avoid greater and deeper savings arising from any delay
- (m) The proposed replenishment of the Voluntary Sector Capacity & Transition Fund

- (n) How the proposals contained within this report will be fed into the formal Budget and Council Tax 2018/19 proposals to be considered by the City Council on 13th February 2018

3 Recommendations

3.1 That the following be approved:

- (a) That the Council's Budget for 2018/19 be prepared on the basis of a 1.99% Council Tax increase for general purposes
- (b) That the Council continues to take advantage of the opportunity to increase the level of Council Tax for an "Adult Social Care Precept" within the limits set by Central Government (i.e. a 3% increase phased over the financial years 2018/19 and 2019/20), and consequently that the additional funding is passported direct to Adult Social Care to provide for otherwise unfunded cost pressures.
- (c) That the Council's authorised limit for external debt in 2017/18 is increased by £45m to £653m
- (d) The savings proposals for each Portfolio amounting, in total, to £4m for 2018/19 and continuing into future years as set out in Appendix A to enable appropriate consultation and notice periods to be given to affected parties
- (e) That £500,000 is transferred from the MTRS Reserve to replenish the Voluntary Sector Capacity & Transition Fund

3.2 That the following be noted:

- (a) The Budget Savings Requirement for 2018/19 of £4m approved by the City Council was based on a Council Tax increase of 1.99%; each 1% change (increase or decrease) in the Council Tax results in a change to the savings requirement of £708,000¹
- (b) The key themes arising from the budget consultation
- (c) The indicative savings proposals set out in Appendix B which are provided for the purpose of demonstrating to the Council that the Portfolio savings as recommended in paragraph 3.1 (d) above are robust and deliverable
- (d) The likely impact of savings as set out in Appendix B
- (e) That the responsibility of the City Council is to approve the overall Budget and the associated cash limits of its Portfolios and Committees; it is not the responsibility of the City Council to approve any individual savings within those Portfolios / Committees
- (f) That it is the responsibility of the individual Portfolio Holders (not full Council) to approve the individual savings proposals and the Portfolio

¹ Tax increases will be subject to Council Tax referendum thresholds which are at this stage unknown

Holder can therefore, in response to any consultation, alter, amend or substitute any of the indicative savings proposal(s) set out in Appendix B with alternative proposal(s) amounting to the same value within their Portfolio

- (g) Managers will commence the implementation of the approved savings required and any necessary consultation process or notice process
- (h) That there is no general provision for Budget Pressures and that it is the responsibility of the Portfolio Holder to manage any Budget Pressures which arise from the overall resources available to the Portfolio (which includes their Portfolio Reserve)
- (i) In accordance with the approved financial framework, it is the responsibility of the Portfolio Holder, in consultation with the Director of Finance & Information Services (S151 Officer), to release funds from the Portfolio Reserve in accordance with the provisions set out in paragraph 10.19
- (j) The MTRS Reserve held to fund the upfront costs associated with Spend to Save Schemes, Invest to Save Schemes and redundancies currently holds a very modest uncommitted balance of £2.0m² and will only be replenished from an approval to the transfer of any non-Portfolio underspends at year end into this reserve

4 Economic & Financial Context

- 4.1 The forecast for the national public finances set out in the Autumn Budget recently are expected to improve for this financial year and next year and then worsen over the subsequent 3 years compared with the Spring 2017 projections. The worsening position is largely due to the lower forecasts of growth over the period to 2021/22 resulting in lower than expected tax receipts, higher debt levels and increased public sector spending (mainly NHS).
- 4.2 Additional capital funding for infrastructure has also been announced, mainly targeted at improving transport connectivity, notably the £1.7bn Transforming Cities Fund, and housing delivery through a £1.1bn Land Assembly Fund and an additional £2.7bn for the Housing Infrastructure Fund against which the Council has currently bid.
- 4.3 Despite the worsening position for the national public finances, the Office for Budget Responsibility still forecasts that the Government remains on track to meet its fiscal rules (i.e. remain within an annual deficit of 3% of GDP).
- 4.4 The Autumn Budget has left Government Departmental Spending limits unaltered, implying that the 4 year Local Government Finance Settlement that the City Council has accepted will remain intact. Additional revenue funding of £2.8bn has been announced for the NHS but it is expected that this will stay

² Assuming that the transfer of £500,000 to the Voluntary Sector Capacity and Transition Fund as recommended in this report is approved

within the NHS rather than being available to support Local Authorities' Social Care budgets.

- 4.5 Measures intended to greater incentivise bringing empty properties back into use were also announced. This enables Local Authorities to increase the premium (currently 150%) to 200%. It is expected however that this will require primary legislation and therefore will not be available to be applied until April 2019.
- 4.6 The announcements in the Autumn Budget are not expected to materially alter the Council's expected revenue funding (see Section 5) from Central Government however other factors such as inflation generally, rising pension costs, the increasing elderly population and the increase in the National Living Wage (4.4%) may impact on the Council's forecasts for future years beyond 2018/19 (see Section 6).

5 Local Government Funding Outlook - 2018/19 and Beyond

Local Government Finance Settlement 2018/19 & Beyond

- 5.1 The Local Government Finance Settlement is the term used to describe the main non-ring fenced Revenue and Capital grant funding allocations from Government.
- 5.2 Over the past 7 years (since 2011/12), Central Government funding to Portsmouth City Council has reduced by over £73m (amounting a 48% reduction in total Government Funding). Taken together with other financial pressures that have been experienced by the City Council (mainly relating to inflation, the effects of an ageing population on care services and the increased requirements for the safeguarding of vulnerable children), the City Council has had to make overall savings over the same period of £94m, representing circa 44% of the Council's net controllable spending.
- 5.3 Looking forward, the Council's current forecasts which run to 2020/21 indicate an overall savings requirement of £12m over the forthcoming 3 year period. This will mean that over the period of the austerity programme, funding from Government will have reduced by some 56%.
- 5.4 The Local Government Finance Settlement for 2018/19 which currently accounts for approximately 39% of controllable spending is expected to be announced in either the second or third week of December 2017. As previously mentioned, it is anticipated that the settlement for 2018/19 will be as set out in the 4 year Finance Settlement upon which the Council's savings requirements are based. Consequently, it is not anticipated that the Council's overall financial position (and its deficits) will be significantly affected by the Settlement.

- 5.5 In overall terms, the Council expects a further reduction in Government Funding over the three year period 2018/19 to 2020/21 of £12.4m, representing a further funding reduction of 31% compared to current levels.
- 5.6 Whilst the Local Government Finance Settlement is a significant factor in determining the Council's overall financial position and therefore any necessary savings, other significant factors that will affect the Council's future savings requirements include Business Rates income, Council Tax income, inflation, interest rates, any new unfunded burdens passed down from Government and any changes in regulations.

Council Tax 2018/19 & Beyond

- 5.7 Portsmouth City Council remains a low taxing Authority. The Council currently receives approximately £6.0m per annum less in Council Tax than the average Unitary Authority within its statistical neighbour group, a gap which the Council would otherwise not need to fund through savings.
- 5.8 The original assumptions for 2018/19, 2019/20 and 2020/21 are for a 1.99% increase in Council Tax each year for general purposes and in addition, a total of a 3.0% increase in Council Tax for the Adult Social Care precept phased over 2018/19 and 2019/20. This generates a total of £5.0m in income over the 3 year period.
- 5.9 For general purposes an increase in the amount of Council Tax payable by the average council taxpayer³ in Portsmouth (with a 1.99% increase) is £19.80 per year (or 38 pence per week).
- 5.10 Each 1% change (increase or decrease) in the Council Tax results in a change to the savings requirement of £708,000⁴. Should the Council wish to reduce the assumed level of Council Tax increase from 1.99%, equivalent savings will need to be made in order to remedy the associated increase in the overall deficit. Conversely, any increase in Council Tax beyond the 1.99% **for general purposes** will make a contribution towards the overall deficit, meaning that the extent of savings to be made will reduce. Council tax increases **for general purposes** however, are subject to a "referendum threshold" which is a limit (i.e. council tax increase) that to exceed requires a "yes" vote in a referendum. The Council Tax referendum limits are not expected to be announced until the second or third week in December as part of the Local Government Finance Settlement.
- 5.11 The "Adult Social Care precept" is an increase in Council Tax that Councils can raise but only if the funding is passported to Adult Social Care. This precept is designed to help relieve the pressure on what is termed "the funding crisis in

³ The median Council Taxpayer lives in a Band B property

⁴ Tax increases will be subject to Council Tax referendum thresholds which are at this stage unknown

adult social care" which is occurring as the elderly population rises alongside the cost of care.

- 5.12 The limit for the Adult Social Care (ASC) precept is determined by Central Government and was set at 6.0% in total for the 3 year period including this financial year through to 2019/20. Having increased the Council Tax by 3% in 2017/18 for the ASC Precept, 3% flexibility remains for the following 2 years. A 3.0% increase in Council Tax, phased over the next 2 years would raise £2.1m in total and amount to an average annual increase of £14.93 (or 29p per week).
- 5.13 As set out in Section 6, there are a number of actual and potential cost pressures that either currently exist or will fall on Adult Social Care in 2018/19. This includes the current underlying budget deficit amounting to £1.8m as described in the "Revenue Budget Monitoring 2017/18 (2nd Quarter) to end September 2017" report contained elsewhere on this Agenda. In addition, Adults Social Care will face pressures from the rising elderly population generally, the requirements of the Care Act and the 4.4% increase in the National Living Wage. The National Living Wage alone could confer an additional cost of circa £1.4m on the Council in 2018/19 with just £2.1m available from the ASC Precept over the next 2 years.

Business Rates 2018/19 & Beyond

- 5.14 The previous grant funding system from Government changed in 2013/14. Funding from Government was reduced and replaced with the ability to retain 49% of all Business Rates collected. Business Rates income is increased by inflation each year and is also influenced by the extent to which Business Rates income grows or contracts and the level of successful appeals against rates valuations. Whilst this presents an opportunity for Local Authorities with strong business growth potential, it also presents risks for Authorities whose business rates base is in decline or subject to "shocks" such as closure (or relocation) of major businesses in an area.
- 5.15 The system is complex but some of the key features are highlighted below:
- For business the National Non Domestic Rates (NNDR) system will remain the same. Local Authorities do not have control over how the level of tax is determined for ratepayers
 - If the business rate taxbase grows the City Council will be rewarded with increased funding, but if it declines Council funding will reduce
 - It is estimated that a 1% change in Business Rates will result in circa £410,000 change in funding
 - Local Authorities that have very significant business rate growth will pay a levy

- A safety net payment will come into effect if an Authority's income falls by more than 7.5% of the original baseline funding level.

5.16 Current estimates of the City Council's share (i.e. 49%) of total Business Rates collected for 2017/18 is £40.0m. For the period 2018/19 to 2020/21, the Council's forecasts assume no real growth but with inflationary uplifts in accordance with original estimates from the Office for Budget Responsibility (OBR).

5.17 The Council has applied to become a 100% Business Rate Pilot for 2018/19 in a pooled arrangement with the Isle of Wight Council and Southampton City Council. The outcome of the application will be announced in December 2017. The arrangement is one where both risks and rewards must be shared across all authorities. The scheme is intended to reduce volatility in the income from Business Rates as well as maximise the incentive to grow the business rate base. The scheme itself will include a "No Detriment" provision, meaning that the Council can be no worse off than under the current 49% retention system with its associated protections. It does however, provide the opportunity for the 3 Councils to retain 100% of any growth in Business Rates so long as it is used to:

- i) Promote financial stability and sustainability across the pooled area
- ii) Re-invest in promoting further growth across the area

5.18 Changes to the estimated Business Rate income for the current and future years arising from changes to assumptions will be reflected in the comprehensive revision to the Council's overall financial forecasts in February 2018. Any consequent implications will be reflected in the Savings Requirements for future years.

5.19 Economic growth and job creation in the City are a key part of the Council's Financial Strategy. The City Council has a key role in regenerating the city, working with partners to grow the local and sub-regional economy. As described later in this report, growth and job creation has the dual impact of increasing the prosperity of residents generally which leads to a reduction in demand for Council services and increases Business Rates, of which 49% (or 100%) is retained by the Council. This allows the Council to both reduce its costs as well as generate additional income.

5.20 In summary, the forecast funding for Local Government from Central Government Grant should be relatively stable and Council Tax income is also predictable with a reasonable degree of accuracy. Significant uncertainty over the estimated income from Business Rates will remain. Whilst a degree of uncertainty exists, the Council's current forecasts for 2018/19 anticipate a total reduction in revenue funding from Government of £3.9m⁵ whilst a Council Tax increase of 1.99% will generate £1.4m of income, a net shortfall of £2.5m before taking account inflationary and other cost pressures.

⁵ Based on the Baseline Funding level that includes RPI uplift on Business Rates

6 City Council Expenditure Outlook - 2018/19 & beyond

Demographic Changes

- 6.1 Demographic changes are likely to generate the largest cost pressures facing the City Council going forward. As well as pressure caused by an ageing population there is also pressure caused by a "living longer" population. More people are coming through the transition into Adults Social Care from Children's Social Care with profound physical or learning disabilities and tend to be at the higher end of the care spectrum, costing significant amounts of money.
- 6.2 Additionally, the number of children in care with extremely challenging conditions is also increasing, causing significant increases in the number of expensive Out of City placements into specialist accommodation.
- 6.3 The outlook therefore for the Council's essential care services is one of increasing volumes and therefore rising costs.

Government Policy Changes / Expectations 2018/19 and Beyond

- 6.4 Reforms to the welfare system are likely to result in additional demands on the Council's housing and essential care services.
- 6.5 Such changes could also reduce the income which the Council can charge for providing those services. The cumulative impact of the reforms where separate benefits convert to Universal Credit coupled with the change from Disability Living Allowance to Personal Independence Payments is likely to reduce social care clients' disposable income and therefore the amount they can afford to pay for their care.
- 6.6 New care duties and responsibilities for local authorities commenced under the Care Act in April 2015. The Government has stated that it will fund these new Care Act requirements in full (either to Local Authorities directly, and potentially by the ability to raise Council Tax, or through the Better Care Fund of the NHS).
- 6.7 The introduction of the National Living Wage from April 2017 and continuing increases above the rate of inflation (4.4% for 2018/19) is expected to create significant cost pressures for the Council particularly in Adult Social Care contracts. Estimates suggest that the impact could be in the order of £1.4m per annum.

Inflation

- 6.8 In overall terms, the cost of inflation has been relatively modest in recent years, largely held down due to constraints on public sector pay. General inflation has however been on the rise over the past 12 months and is currently running at

3.0%. The OBR has forecast that inflation (measured by the Consumer Price Index or CPI) will peak at or around 3.0%, falling back to 2.2% in 2018/19 and flattening to around 2.0% for the following 3 years. For the next 3 year period, the Council's current forecasts assume that inflationary costs will amount to £9.0m with overall composite rates for inflation (taking into account pay, contracts linked to the Retail Price Index (RPI), CPI generally across other expenditure and pension obligations) ranging between 2.6% to 3.0% over the period. These assumptions will be comprehensively reviewed in February 2018 with all of the other assumptions within the Council's medium term financial forecasts when they will be known with greater certainty.

- 6.9 The Autumn Statement did however confer some additional cost pressures on the Council in relation to the uplift in the National Living Wage from £7.50 to £7.83 (4.4% increase) from April 2018 which will predominantly affect Adult Social Care contracts. The impact of the National Living Wage increase is expected to amount to £1.4m.

Interest Rates

- 6.10 Interest rates for investments were initially forecast to range between 0.25% in 2018/19 and rise steadily to 0.75% in 2020/21. Expectations now are that interest rates will be slightly higher than originally forecast and this will have a positive influence on the Council's overall financial position. This will be reviewed as part of the Council's comprehensive revision of its forecast in February 2018.
- 6.11 Borrowing rates are quite volatile due to the impact of the EU Referendum and general geo-political developments but the general expectation is for an eventual trend of gently rising gilt yields and therefore borrowing rates. The Council is not generally in a borrowing position in the short term but may take modest amounts of borrowing (for future requirements) within the next 3 years if low rate opportunities arise.

Assets / Investments

- 6.12 In accordance with the Council's Medium Term Financial Strategy, the Council has been active in both acquiring new commercial property as a means of generating income to avoid cuts to Council Services and seeking to maximise the return from its existing property portfolio. As part of that Strategy, Cabinet approved the granting of a head lease of Wightlink to Canada life with a subsequent leaseback. The effect of the transaction was to receive £73m for the lease in return for an annual payment for 46 years to Canada Life. The financial appraisal demonstrated that this was the optimal method for obtaining capital from the asset using a sale and leaseback structure using the Council's covenant strength to increase the overall return from the asset,

whilst importantly enabling the Council to retain ownership and control of this strategically important site in the long term. It was also tax efficient.

- 6.13 Although these transactions are legally structured as leases, in substance the City Council has borrowed £73m from Canada Life to invest in other commercial properties. The effect of these transactions is to increase the City Council's external debt by £73m from £569m at 31 March 2017 to £642m. The opportunity to enter into such an arrangement was not known at the time the Council approved its limit for external debt and as a consequence, the limit was exceeded by £24m. The effect of this "borrowing" has flowed through into 2017/18 and accordingly it is recommended that the authorised limit for external debt for 2017/18 be increased by £45m to £653m in order to provide the Council some flexibility to undertake further borrowing, including short term borrowing for liquidity purposes if necessary.
- 6.14 In overall terms, the effect of this arrangement has been to increase the income from this asset by circa £2.4m per annum in the future steady state.

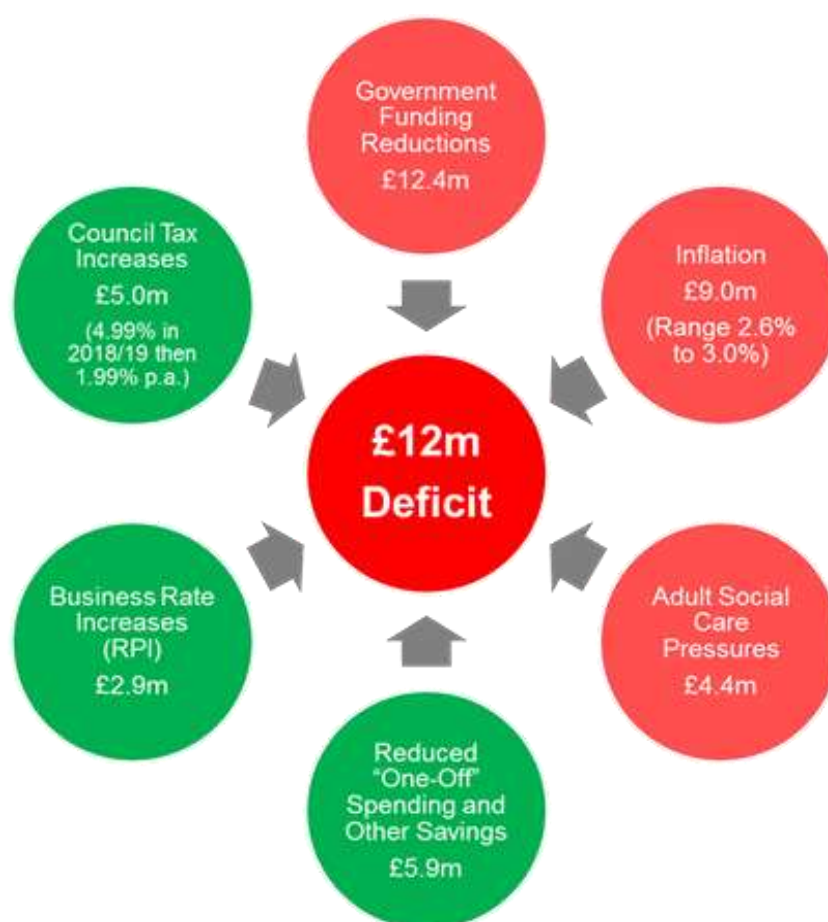
Summary

- 6.15 All of the demographic, legislative and other cost changes will be taken into account in the comprehensive revision to the Council's overall financial forecasts in February 2018. Any consequent implications will be reflected in revisions to both the proposed savings (Appendix B) and the Savings Requirements for future years.

7. Overall Financial Forecast - 2018/19 to 2020/21 (Existing Forecast)

Overall 3 Year Financial Forecast

- 6.16 In overall terms, taking account of both spending pressures and funding reductions over the next three financial years, it is forecast that the Council faces an overall deficit of £12m. This means that by 2020/21, the Council's net expenditure will need to be £12m less than it is at present and that savings of that sum will need to be made either through increased income or reduced costs. This will be reviewed as part of the comprehensive revision to the Council's overall financial forecasts in February 2018.
- 6.17 An illustration of the factors causing the forecast £12m deficit as described in Sections 5 & 6 is shown below:



Savings Requirement for 2018/19 & Forecast Savings Requirements for 2019/20 and 2020/21

- 6.18 The last comprehensive review of the City Council's 3 Year Financial Forecast was reported in the Annual Budget Report in February 2017. This set out the

City Council's underlying budget deficit and consequent forecast Budget Savings Requirement for the next 3 years as follows:

	Underlying Budget Deficit	Annual Budget Savings Requirement	Total Savings Requirement
	£m	£m	£m
2018/19	3.9	4.0	4.0
2019/20	8.9	4.0	8.0
2020/21	11.4	4.0	12.0

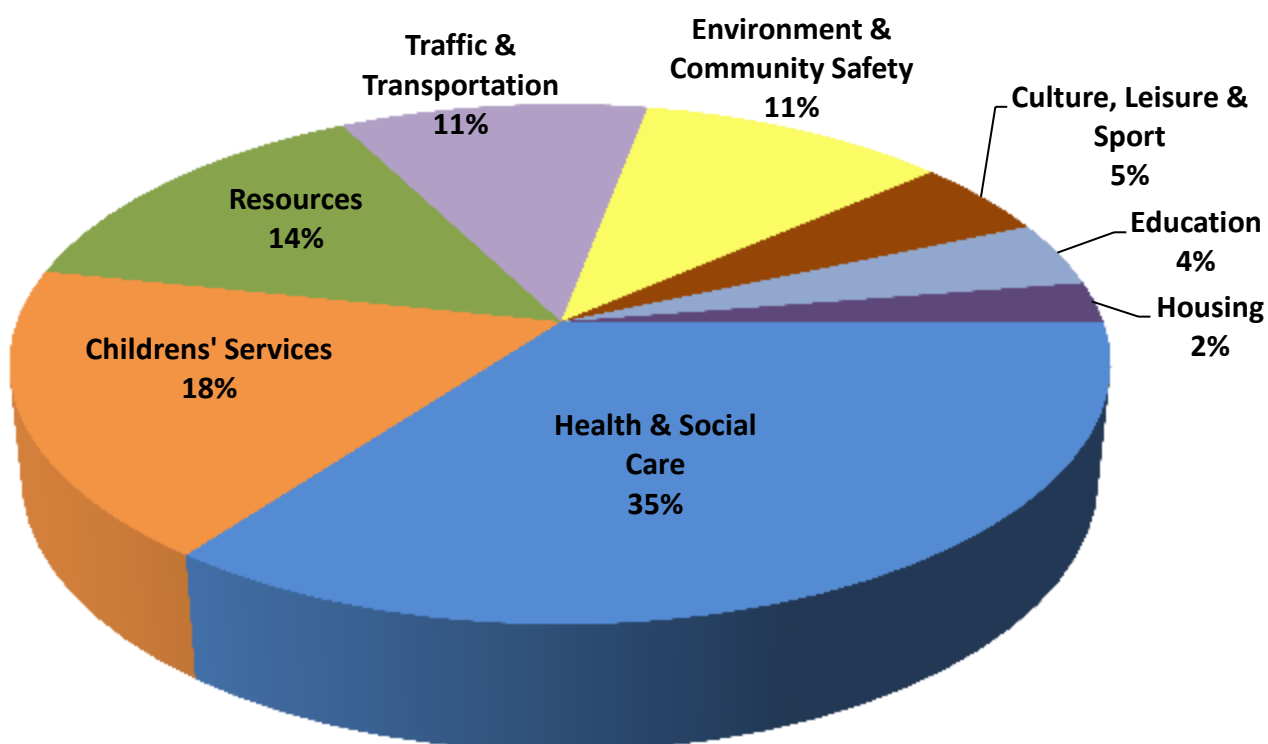
- 6.19 On the basis of the overall £12m deficit and the preference to be able to manage those savings smoothly over that period, the City Council resolved in February 2017 that a minimum savings requirement of £4.0m would be implemented for 2018/19. That minimum savings requirement was predicated on a Council Tax increase of 1.99% for general purposes (generating £1.4m of additional Council Tax income). It also assumed that a further 3.0% increase in Council Tax for the ASC Precept would be raised over the period 2018/19 and 2019/20 (generating £2.1m of additional Council Tax income).
- 6.20 The Council is aware of a number of potential changes to the assumptions underpinning these forecasts and will also be undertaking the usual review of the estimates of Council Tax and Business Rates income in early January 2018, this means that a comprehensive revision at this stage would be premature and subject to potential significant change.
- 6.21 The Director of Finance & IS (S151 Officer) advises that whilst it is likely that the overall financial forecasts will change, the savings requirement for 2018/19 at £4.0m (with a Council Tax increase of 1.99% for general purposes and a Council Tax increase for the ASC Precept of 3.0% over the period 2018/19 and 2019/20) remains robust and prudent. Given what is known, or reasonably expected, regarding future funding reductions and given future uncertainties, a savings requirement of less than these sums would not be prudent.

8. Medium Term Financial Strategy - 2018/19 & Beyond

Financial Strategy 2018/19 & Beyond

- 8.1 In overall terms, the financial picture over the next 3 years and beyond is one of increasing costs and demand for services, particularly in essential care services, at the same time as continued and unprecedented reductions in funding. Taking all of the cost and funding implications into account, the Council's forecasts prepared in February 2017 estimated that the Council will need to make £12m of savings over the next 3 years.
- 8.2 Considering also that those essential care services consume 53% of the Council's net controllable budget, the Council is faced with a position where it not only has to meet those costs, or at the very least manage the demand for those services, but simultaneously find £12m of savings across all areas. This is illustrated below:

2017/18 Net Controllable Expenditure of £118m



- 8.3 It is also of significance that a further 22% of the Council's controllable spend is consumed by the Traffic & Transportation and Environment & Community Safety Portfolios where a large proportion of their activities are tied into long-term contracts where the savings potential is more limited.
- 8.4 The Council's Medium Term Financial Strategy has been developed to respond to these very challenging circumstances. The Strategy has a strong regeneration focus with a presumption that Capital investment will be targeted towards economic growth. This is to improve the prosperity of the City through employment as an objective in itself but also because this will reduce the demand for Council services generally. Furthermore, re-generation creates the opportunity for additional business rates to be generated and retained by the Council. The Capital Programme can also be a vehicle for Invest to Save schemes enabling the Council to reduce its own costs in the future.
- 8.5 Equally prominent in the strategy below is the strong focus on entrepreneurial activities leading to income generation as a means to make savings and avoid cuts to services.
- 8.6 The Strategy is illustrated overleaf:

OVERALL AIM

"In year" expenditure matches "in year" income over the medium term whilst continuing the drive towards regeneration of the City, being entrepreneurial and protecting the most important and valued

STRAND 1

Transforming to an Entrepreneurial Council:

- Income Generation
- Maximise the return on Property and Assets
- Invest for commercial gain
- Develop and establish commercial entities to sell services profitably
- Capital investment for jobs and business growth (increased Business Rates)
- Establishing strategic partnerships / share service arrangements to reduce costs and increase resilience

STRAND 2

Reduce the extent to which the population needs Council Services

- Re-direction of resources towards preventative services (avoid greater costs downstream)
- Design fees & charges policies to distinguish between want and need
- Capital investment towards jobs and skills to raise prosperity

STRAND 3

Increase the efficiency & effectiveness of the Council's activity:

- Contract reviews
- Rationalisation of operational buildings
- Support to the Voluntary Sector
- Targeted efficiency reviews in "resource hungry" services
- Capital investment for on-going savings or cost avoidance

STRAND 4

Withdraw or offer minimal provision of low impact Services:

- Strong focus on needs, priorities on outcomes
- Use the insights of Councillors to inform priorities
- Use the results of public consultation to inform priorities

The Strategy is underpinned by a financial framework which provides financial autonomy to Portfolios and Committees. Any underspending arising against their budgets are retained by them. This was deliberately designed to create the financial conditions that support responsible spending and promote forward financial planning. The implication of this is that the opportunity for future underspendings to accrue and be available corporately is much reduced. It is vitally important therefore that the use of any corporate underspend is used wisely and in accordance with the Council's Medium Term Financial Strategy aimed at meeting the future financial challenges of the Council.

- 8.7 The MTRS Reserve is a fundamental component of the Council's financial framework and is designed to provide funding for future redundancies, Spend to Save and Invest to Save initiatives. The current uncommitted balance on the MTRS Reserve amounts to £2.5m and is considered to be very modest in the context of the £12m of savings that the Council is required to make over the next 3 years.

9 Budget Process & Consultation 2018/19

- 9.1 During October and November of this year, the Council undertook a Budget consultation to understand residents spending priorities. Budget consultations in previous years agreed that income generation should be pursued as an alternative to cuts, that joint working was welcomed and that services to vulnerable adults and children should be protected. Due to the larger scale of Revenue savings required in previous years, Budget Consultations have focussed on where the Council should be making savings. The Budget Consultation this year has been extended to also cover the Council's Capital Investment priorities.
- 9.2 The consultation was city wide and took the form of a questionnaire which was also supplemented by a series of public meetings with residents, staff and the business community.
- 9.3 The final response rate from the consultation was as follows:

Residents	937
Staff	631
Citizen's Panel	121
Total	1,689

- 9.4 The response rates are distributed throughout the city and provide a varied set of responses. As was the case last year, three of our key MOSAIC groups across the city - Rental Hubs, Transient Renters and Aspiring Homemakers are over-represented in the sample, although the order and significance has changed. Urban Cohesion and Domestic Success are also over-represented this year while Municipal Challenge has dropped down to a level more proportional with the city split. Significantly under-represented groups include Suburban stability and Family basics. Suburban stability is generally

representative of comfortable families, while Family basics are generally families struggling to make ends meet in social housing

9.5 Given the response volume, the results can be considered to be statistically robust with a margin of error of 2% based on a 95% confidence rate.

9.6 Overall, whether a staff member or a resident, respondents for the most part agreed with the overall management strategy for the budget. The main conclusions were:

- Over 67% think it is important for the council to invest in improving city centre roads
- Over 77% think it is important for the council to invest additional money to enhance the flood defences scheme
- Over 85% think it is important to invest in our secondary schools to make sure there are enough places for all young people
- Over 77% think it is important to invest in roads, pavements and cycle ways
- Over 74% think it is important to invest in culture, leisure centres and parks
- In terms of services that residents value overall, the following received the most votes:
 1. Rubbish and Recycling (855 respondents)
 2. Children's Social Care (660 respondents)
 3. Adult Social Care (627 respondents)
 4. Maintenance and Seafront (566 respondents)
- 73% of respondents indicated that they would accept a council tax increase of 2% or more (with the largest category of residents indicating that they would accept a 4% increase).
- 50% of respondents indicated they would support an additional increase to support vulnerable residents.
- Only 12% of respondents indicated that they felt there should be NO increase in council tax.

9.7 The full results of the Budget Consultation can be found at:

<https://www.portsmouth.gov.uk/ext/the-council/transparency/budget-2018-2019>

9.8 These results have been fully considered by the Administration in formulating their budget savings proposals described in Section 10 below.

10 Budget Proposals for 2018/19 to 2020/21

Budget Savings Proposals 2018/19

- 10.1 The Administration's budget savings proposals are aligned with the Medium Term Financial Strategy previously described in Section 8 and have been prepared paying due regard to the responses from the Budget Consultation set out in Section 9 as well as the Administration's strategic priorities. The proposed savings amounts to be made by each Portfolio, and which are recommended for approval, are attached at Appendix A.
- 10.2 The Administration's proposals are focussed on an "Avoidance to Cuts" approach in line with the Medium Term Financial Strategy. In overall terms, the proposed £4m of savings are characterised as follows:

Description of Saving	Savings	
Efficiency Savings (little or no reduction in Services)	£2.4m	60%
Additional Income	£1.4m	36%
Service Reduction	£0.2m	4%
Total	£4.0m	100%

- 10.3 For 2018/19, Efficiency Savings account for 60% of the proposed savings, with 36% relating to Additional Income and just 4% Service Reduction measures.
- 10.4 Noting also the response from the Budget Consultation which generally suggests that services to the vulnerable should receive some measure of protection, the Administration's savings proposals provide full protection from savings for Children's Social Care and significant protection from savings for Adult Social Care. As a necessary consequence, savings from other Portfolios are proportionally higher and significantly higher in some cases such as Planning Regeneration & Economic Development and Other Expenditure.

- 10.5 A summary of the overall savings proposals for 2018/19, by Portfolio, is set out below.

Portfolio / Committee	Savings Proposal	
	£	% Budget
Children's Social Care	0	0.0%
Culture, Leisure & Sport	277,300	2.8%
Education	180,000	2.8%
Environment & Community Safety	150,000	0.9%
Health & Social Care - Adults Social Care	860,600	1.6%
Health & Social Care - Public Health	236,000	1.9%
Housing	109,000	2.1%
Planning, Regeneration & Economic Development	815,100	9.8%
Resources	798,000	2.5%
Traffic & Transportation	305,000	2.3%
Other Expenditure (incl. Debt Repayment)	269,000	6.5%
Grand Total	4,000,000	2.1%

*** Excludes the additional funding passported through the Adult Social Care Precept and additional funding for the Care Act meaning that in cash terms there is a zero reduction to Adult Social Care**

- 10.6 The analysis above highlights the conundrum that the Council faces regarding the desire to protect both Adults and Children's Social Care whilst still wishing to retain good quality sustainable public services in its other portfolios. By way of example, the average saving required across the Council was 2.1% of spending but to fully protect Children's Social Care (at 0.0% budget reductions) and Health & Social Care - Adult Social Care (at 1.6% budget reductions), it has been necessary to make spending reductions / additional income in other valued Portfolios of up to 9.8%.
- 10.7 Inevitably, there are a number of financial risks contained within the proposals for making savings of the scale of £4m (or 2.1%) on the back of making £94m in savings and efficiencies over the past 7 years. The risks are unavoidable. For those risks with the highest likely impact, mitigation strategies are being developed. In previous years, the highest risks have been to the delivery of the savings within the essential care services and whilst these still remain, they have generally been managed by making some contingency provision on a "one-off" basis in order to provide additional time to re-design service provision.
- 10.8 Looking forward to 2018/19, there still remain risks in both Children's and Adults Social Care. Whilst the Council is forecasting a balanced budget in the current year, there remain underlying deficits totalling £3.6m in these two Services of £1.8m (Children's Social Care) and £1.8m (Adults Social Care).
- 10.9 For Children's Social Care, a plan is in place to reduce that deficit which focusses on increasing the number of Social Workers to provide more

targeted and intensive support as a mechanism to reduce the number of Looked After Children in the system alongside plans to reduce the number of Children in expensive Out of City residential placements. Additionally, no savings are proposed from Children's Social Care for 2018/19 whilst the deficit reduction measures are in place.

- 10.10 For Adults Social Care (ASC), the funding received via the ASC Precept and the transformation initiatives funded by the improved Better Care Fund Allocation (amounting to £7.8m for the period 2017/18 to 2019/20) is planned to be used to remedy the underlying deficit and meet the demographic cost pressures facing the service.
- 10.11 The measures described above are being planned in order to eliminate these deficits and place their budgets on a sound footing for 2018/19. Nevertheless, risks to delivery will remain and the Council will need to ensure that adequate contingency provision is made to cover that eventuality.
- 10.12 It is important to note that the Council's responsibility is to set the overall Budget of the Council and determine the cash limits for each Portfolio. It is not the responsibility of the Council to approve the detailed savings that need to be made in order for the Portfolio to meet its cash limit. The Council do need to have the confidence that the recommended savings for each Portfolio are deliverable and what the likely impact of delivering those savings might be. Indicative savings that are likely to be necessary in delivering the overall Portfolio savings are attached at Appendix B and whilst the detailed savings are not a matter for the Council to decide, they are presented to inform the decision of Council relating to the overall savings to be made by each Portfolio / Committee.
- 10.13 To provide the best opportunity to achieve full year savings and deliver the £4m Savings Requirement, it would be prudent and financially responsible for the Council to seek to implement its 2018/19 savings as early as possible. From the perspective of service delivery, giving partners and residents significant advance notice of the changes to come into effect from next April will assist them to plan for change accordingly.
- 10.14 A crucial part of a prudent financial strategy is to maintain strong financial resilience. That means maintaining adequate levels of reserves to be able to respond to "financial shocks" or having reserves available to help implement savings in a planned and managed way. The early (or timely) implementation of savings proposals ensures that those reserves remain intact and are available for such purposes.
- 10.15 In order for the City Council to be able to implement the Savings Requirement in good time, a number of savings proposals will require that consultation take place and notice periods be given. Should the Portfolio savings set out in Appendix A be approved, Managers will commence the implementation of those savings and any consultation process or notice process necessary.

- 10.16 For savings proposals that require consultation, the actual method of implementation or their distributional effect will not be determined until the results of consultation have been fully considered. Following consultation, the relevant Portfolio Holder may alter, amend or substitute any of the indicative savings proposal(s) set out in Appendix B with alternative proposal(s) amounting to the same value.

Budget Pressures Proposals 2018/19

- 10.17 The Council no longer makes any general provision for Budget Pressures. This was agreed as part of the Medium Term Financial Strategy approved by the City Council in November 2013.
- 10.18 One of the aims of the Medium Term Financial Strategy is to create the conditions that incentivise responsible spending and strong forward financial planning. As a consequence, a financial framework was implemented which provides Services with much greater financial autonomy.
- 10.19 The features of the financial framework include:
- i) Each Portfolio to retain 100% of any year-end underspending and it to be held in an earmarked reserve for the relevant Portfolio
 - ii) The Portfolio Holder be responsible for approving any releases from their earmarked reserve in consultation with the Director of Finance & Information Services (S151 Officer)
 - iii) That any retained underspend (held in an earmarked reserve) be used in the first instance to cover the following for the relevant Portfolio:
 - a) Any overspendings at the year-end
 - b) Any one-off Budget Pressures experienced by a Portfolio
 - c) Any on-going Budget Pressures experienced by a Portfolio whilst actions are formulated to permanently mitigate or manage the implications of such on-going budget pressures
 - d) Any items of a contingent nature that would historically have been funded from the Council's corporate contingency provision
 - e) Spend to Save schemes, unless they are of a scale that is unaffordable by the earmarked reserve (albeit that the earmarked reserve may be used to make a contribution)

Once there is confidence that the instances in a) to e) can be satisfied, the earmarked reserve may be used for other developments or initiatives

- 10.20 Correspondingly, any Budget Pressures must be funded within the overall resources available to the Portfolio Holder (which includes their Portfolio Reserve).

- 10.21 Whilst no general provision exists for Budget Pressures, the Budget proposals do provide for the passporting of the Adult Social Care Precept to Adult Social Care as well as additional funding received to meet the new burdens associated with the implementation of the Care Act.

Medium Term Resource Strategy Reserve - Position

- 10.22 The Medium Term Resource Strategy Reserve (MTRS Reserve) is a reserve maintained by the Council for Spend to Save, Spend to Avoid Cost and Invest to Save Schemes. It is also the reserve that funds all redundancy costs arising from Budget Savings proposals. At present the reserve has an uncommitted balance of £2.5m.
- 10.23 An uncommitted balance on the MTRS Reserve of £2.5m is considered to be very modest in the context of the £12m of savings that the Council is required to make over the next 3 years. As the Council's primary vehicle for providing funding for Spend to Save initiatives, it is crucial that this fund is both spent wisely and replenished at every opportunity.

Proposals for the Voluntary Sector Capacity & Transition Fund

- 10.24 The Voluntary Sector Capacity & Transition Fund was established to secure **sustainable voluntary sector services** in the future as a means to sustain or improve Council services, avoid cost and / or make savings. There is an emphasis on the fund to build capacity across the sector in a sustainable way. The criteria for the use of the fund are:

- Overall fit with the Council's objectives - providing services consistent with the Council's responsibilities that are not replicated elsewhere
- Integration and/or collaboration with other voluntary sector partners - demonstrating a willingness to transform and build voluntary sector capacity on a sustainable basis
- Deliverability - proposals are costed robustly and plans demonstrate that they can be confidently delivered
- Sustainability - a single application for a 1 year, 2 year or 3 year award which demonstrates an operating model that will endure without further funding from the Council
- Cost Avoidance - illustration of how the proposal avoids costs elsewhere "in the system" and / or improves the integration and efficiency of the voluntary sector as a whole
- Potential for further Transformation - the extent to which the proposal could drive further transformation and capacity of the voluntary sector in the future
- Wider economic impacts

- 10.25 The use of the Fund in 2017/18 and its expected outcomes are anticipated to be successful in delivering better services and either avoiding or reducing

cost. Considering both the awarded and earmarked sums, it is now almost fully subscribed and has been used to fund the following:

Project (Awarded Funding)	Lead Organisations	Purpose	Grant Award
Re-unification Pilot	Motiv8, Barnardos, Home Start	Pilot of intensive bespoke work with families to keep children within family unit - saving significant costs of care	£25,000
Reunification Full project	Motiv8, Barnardos, Home Start	Moving pilot (as above) to fuller service	£50,000
Portsmouth Counselling reconfiguration	You Trust	To provide counselling services as Portsmouth Counselling Service ceased	£50,000
Edge of Care	Motiv8	Intensive support in families for older children - saving significant cost of on-going care and placements	£50,000
Dadz Club	Public Health	To set up a mentoring , support network around the role of fathers, linking into families and mental health	£70,000
Mental Health Café	Good Mental Health Co-operative	To provide safe space and support and training for mental health	£57,886
Total Awarded			£302,886

Project (Earmarked Funding)	Lead Organisations	Purpose	Earmarked Funds
Reunification (continuation - see above)	Motiv8, Barnardos, Home Start	As above but award dependent on satisfactory outcomes	£50,000
Edge of Care (continuation - see above)	Motiv8	As above but award dependent on satisfactory outcomes	£50,000
Total Earmarked			£100,000

Total Grants Awarded / Earmarked	£402,886
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10.26 Based on its anticipated success, the Administration propose to make a further transfer from the MTRS Reserve of £500,000 to continue to support the development of the Voluntary Sector. In making this transfer, the Administration will be seeking to encourage and incentivise innovation between the Council and the Sector for the next round of applications

Approval of the Budget 2018/19

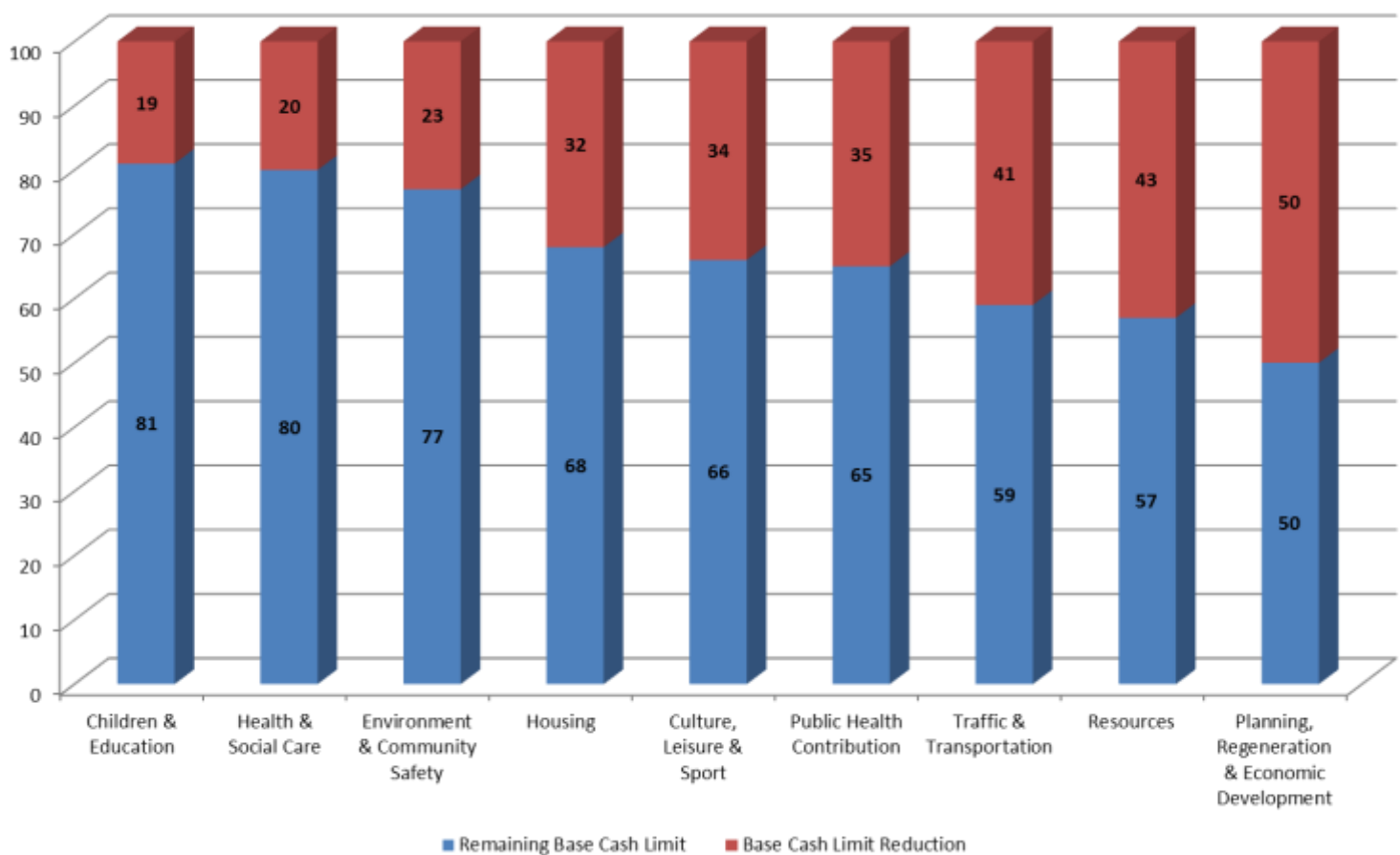
- 10.27 At the 13th February 2018 Council meeting, a comprehensive revision of the Council's future forecasts will be presented. This will revise all of the key assumptions set out below as well as extending the forecast to cover an additional year (2021/22) in order to maintain a rolling 3 year plus current year financial forecast.
- 10.28 The Budget 2018/19 presented to the City Council for approval will be prepared on the basis of the proposals for savings and Council Tax set out in this report. It will also include the outcome of the following:
- The Local Government Finance Settlement for 2018/19
 - The final estimate of the Council Tax yield (based on the determination of the Council Taxbase)
 - The final estimate of the Business Rate yield
 - Any necessary inflationary uplifts
 - Changes in regulations
 - Final estimates of all items outside of cash limits including capital charges, support service charges, insurance, pension costs, contingency, borrowing costs, investment income, levies and precepts
 - Any necessary virements across Portfolios to reflect changes in responsibilities.

11 Conclusion

- 11.1 The City Council continues to face the challenge of significant funding reductions but compounded by increasing cost pressures, most of which are driven largely by demographic pressures in the essential care services. Inflation more generally is at levels not seen for some time. Taken together, this requires the Council to make savings and/or increase income by £12m over the next 3 years (assuming a Council Tax increase of 1.99% in each and every year plus an increase of 3.0% for the ASC Precept over the period 2018/19 to 2019/20).
- 11.2 The first tranche of these savings amounting to £4m for 2018/19 have been developed in accordance with the Council's Medium Term Financial Strategy and with regard to the Budget Consultation recently completed. The overall strategy focusses on the avoidance of cuts with an emphasis on:
- Entrepreneurial activities such as maximising returns from property and assets and other income generation measures
 - Increasing the efficiency and effectiveness of the Council's services
 - Reducing the extent to which the population needs Council services (through prevention activities and regeneration activities)

Given the speed at which savings need to be made, it is inevitable that some cuts are required. These cuts, amounting to just 4% of the total savings required, have been informed by the budget consultation exercise and have been proposed on the basis that they are in the areas of least impact.

11.3 Before the £4m of savings proposals set out within this report, the cumulative savings of the Council over the austerity period from 2011/12 amounts to £94m. The impact that this has had on spending levels of Portfolios over that same period is illustrated below (Blue segment illustrates level of spending that remains, red segment is the level of spending which has been removed). The chart illustrates those services that have received relative protection from spending reductions (left hand side) and those services that have provided the compensation by making relatively higher spending reductions (right hand side).



11.4 The chart demonstrates that Services such as Children & Education, Health & Social Care and Environment & Community Safety have received the most protection from funding reductions and significantly more than "back office" services. This theme is continued through the Budget savings proposed for 2018/19 with those exact same services making the lowest savings as follows compared to the average saving of 2.1%:

- Children's Social Care - 0.0%
- Environment & Community Safety - 0.9%
- Health & Social Care - Adult Social Care - 1.6%

- 11.5 Looking forward beyond 2018/19 still with significant savings to be made, to avoid significant cuts to Services, the Council will need to continue to focus its strategy on entrepreneurial activities and regeneration.
- 11.6 It is clear that unless savings can be made through additional income or additional funding from Business Rates and Council Tax arising from investment in regeneration, the burden of those savings will be required from efficiencies and service reductions. Inevitably, given the size of the savings required and the proportion of spending consumed by the Care Services, the Council will no longer be able to afford the same levels of protection that have been provided in the past for its Children's Social Care, Adults Social Care and Environment and Community Safety services without very severe cuts to all other Services.
- 11.7 Approval for the savings proposals is recommended at this early stage in order to achieve full year savings and avoid greater and deeper cuts associated with any delay. In terms of service delivery and planning, it is equally important to provide partners and residents significant advance notice of the changes to come into effect in order to assist them to plan for change accordingly.
- 11.8 This report is the pre-cursor to the Annual Budget and Council Tax Setting meeting to be held on the 13th February 2018 where the Council will be requested to formally approve the Budget for 2018/19 and the associated Council Tax for the year. Should the savings proposals contained within this report be approved, they will form the basis of the Budget 2018/19 presented to Council in February 2018. That report will also include a comprehensive revision of the Council's future forecasts and set the consequent future savings requirements for the period 2019/20 to 2021/22.
- 11.9 Finally, the proposals within this report will maintain the Council's financial health and resilience and therefore its ability to respond in a measured and proportionate way to any "financial shocks" by having adequate reserves and contingencies available for a Council of this size and risk profile.

12 Equality Impact Assessment (EIA)

- 12.1 The Portfolio / Committee savings amounts proposed within this report will inevitably impact on service provision. Appendix B describes the indicative savings that might (or are likely) to be made in order to achieve the proposed savings amounts. Whilst some are likely to be implemented, there will be others that require consultation and appropriate Equality Impact Assessments to be considered before any implementation can take place. For this reason, any savings proposal set out in Appendix B can be altered, amended or substituted with an alternative proposal following appropriate consultation.
- 12.2 A city-wide budget consultation took place during October and November to help inform how to make £12m of savings over the next 3 years. The

consultation took the form of a questionnaire which was also supplemented by a public meeting with residents, a public meeting with the business community and a meeting with staff and unions.

13 City Solicitor's Comments

13.1 The Cabinet has a legal responsibility to recommend a Budget to the Council and the Cabinet and Council have authority to approve the recommendations made in this report.

14 Director of Finance's Comments

14.1 All of the necessary financial information required to approve the recommendations is reflected in the body of the report and the Appendices.

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Signed by: Director of Finance & Information Services (Section 151 Officer)

Appendices:

A	Recommended Portfolio / Committee Savings 2018/19
B	Indicative Savings Proposals 2018/19

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
Budget Working Papers	Director of Finance & Information Services (S151 Officer)
Local Government Finance Settlement 2016/17	Director of Finance & Information Services (S151 Officer)

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by the City Council on 12th December 2017.

.....
Signed by: Leader of Portsmouth City Council

APPENDIX A

PROPOSED BUDGET SAVINGS AMOUNTS 2018/19 BY PORTFOLIO

Portfolio	Saving 2018/19		Saving 2019/20		Saving 2020/21	
	£	%	£	%	£	%
Children's Social Care	0	0.0%	0	0.0%	0	0.0%
Culture, Leisure and Sport	277,300	2.8%	277,300	2.8%	277,300	2.8%
Education	180,000	2.8%	180,000	2.8%	180,000	2.8%
Environment and Community Safety	150,000	0.9%	150,000	0.9%	150,000	0.9%
Health and Social Care - Adult Social Care	860,600	1.6%	860,600	1.6%	860,600	1.6%
Health and Social Care - Public Health	236,000	1.9%	236,000	1.9%	236,000	1.9%
Housing	109,000	2.1%	109,000	2.1%	109,000	2.1%
Planning Regeneration and Economic Development	815,100	9.8%	815,100	9.8%	815,100	9.8%
Resources	798,000	2.5%	798,000	2.5%	798,000	2.5%
Traffic and Transportation	305,000	2.3%	305,000	2.3%	305,000	2.3%
Other Expenditure	269,000	6.5%	269,000	6.5%	269,000	6.5%
Grand Total	4,000,000	2.10%	4,000,000	2.10%	4,000,000	2.10%

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INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal	Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
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Culture, Leisure and Sport Portfolio**Director of Culture & City Development**

001	Reduce annual revenue grant to Peter Ashley Activity Centre	The organisation's restructured format and potential capacity to generate income would offset the reduction in funding	3,500	3,500	3,500
002	Reduction in revenue grant to the Kings Theatre, reducing to £48,000 in 2018/19	This reduction could be offset by the income generated from the 3 front shop areas. The decorating and updating works for one of these has been funded by the City Council	14,300	14,300	14,300
003	Historic underspending on Grants to Local Organisations	No impact - Avoids cuts to services	5,000	5,000	5,000
004	Reduce annual revenue grant to Portsmouth Table Tennis Club	Reduced capability to facilitate workshops and tournaments	500	500	500
005	Income received from BH Live for management of the leisure facilities contract	No impact - Avoids cuts to services	120,000	120,000	120,000
006	Introduction of a more flexible golf membership package and works to the course to reduce maintenance costs	Revised membership package has already been introduced	14,000	14,000	14,000
007	Reduction in grants to Buckland, Fratton and Paulsgrove Community Centres	Significant reserves are held by these organisations	8,000	8,000	8,000
008	Reduction in administration budget	No impact - Avoids cuts to services	2,000	2,000	2,000
009	Increase sun hut income using flexible pricing for weekly hires and increased income from charging for fridges	No impact - Avoids cuts to services	7,500	7,500	7,500
010	Increased income from seafront poster sites	No impact - Avoids cuts to services	3,000	3,000	3,000
011	Phased transfer of sports pitch attendants role to football clubs	No impact - Avoids cuts to services	5,000	5,000	5,000
012	Guildhall reduction in revenue grant support	The trust has been running the Guildhall site for six years, is well established as a business and has numerous routes it can use to increase income to mitigate this reduction	50,000	50,000	50,000

Appendix B

INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal				Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
013	Parks Service review	Reduced capacity to deal with day to day ad hoc enquiries from the public and assistance to voluntary groups		37,500	37,500	37,500
014	Additional Licence Fee Income for the Guildhall Square	No impact - Avoids cuts to services		7,000	7,000	7,000
Culture, Leisure and Sport Total				277,300	277,300	277,300
<u>Education</u>						
<u>Deputy Director - Education</u>						
015	Recharge to the Dedicated Schools Grant (DSG) to cover the full cost of the Admissions Service	No impact - The DSG has been reviewed by central government and a new Central School Services Block created. As a result Portsmouth's allocation for 2018/19 is £20,000 more than the equivalent funding in 2017/18		20,000	20,000	20,000
016	To use the Looked After Children Pupil Premium Grant to cover the cost of the Deputy Head of the Virtual School	Secures funding for the Deputy Head post of the virtual school. The Pupil Premium Grant is already used to cover three other posts (case workers) in the Virtual School Team		45,000	45,000	45,000
017	Reduction in the expenditure on services to provide the short breaks offer	The proposed reduction will be delivered through a re-tendering of the service (all of the current contracts end on 31st March 2018). The revised contract will be designed to maximise access to holiday provision by children with disabilities within the funding available		45,000	45,000	45,000
018	Reduction in the Portsmouth Education Partnership and School Improvement budgets	As schools transfer to academies, costs associated with school improvement become the responsibility of the academy. As a consequence council spending in this area is reducing as more academies become responsible for the cost of school improvement		70,000	70,000	70,000
Education Total				180,000	180,000	180,000
<u>Environment and Community Safety</u>						
<u>Director of Property & Housing Services</u>						
019	Waste Disposal Contract - reduction in tripartite contractor payments	No adverse impact to services		150,000	150,000	150,000
Environment and Community Safety Total				150,000	150,000	150,000

INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal				Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
Health and Social Care						
Director of Adult Services						
020	Direct Payments to be delivered only using prepaid cards. This reduces the risk of fraudulent spend, allows for the recovery of surpluses and greater control over the expenditure being incurred	Full year financial impact of saving implemented in 2017/18		25,000	25,000	25,000
021	Review of the Carers Service - To include staffing, accommodation and service options	Full year financial impact of saving implemented in 2017/18		39,000	39,000	39,000
022	Review of high cost Older Persons and Physical Disability Packages of care cases	Full year financial impact of saving implemented in 2017/18		100,000	100,000	100,000
023	Learning Disability Housing and Support redesign	This will increase independence, reduce night time cover and enable the introduction of a Key Ring model of support		150,000	150,000	150,000
024	Lower requirement for Older Persons/Physical Disability administration following process review	No impact - Avoids cuts to services		22,500	22,500	22,500
025	More representative sharing of the Community Equipment Store operational costs between the City Council and the Clinical Commissioning Group	No impact - Avoids cuts to services		174,000	174,000	174,000
026	Reduction in Software & Hardware Costs	No impact - Avoids cuts to services		66,400	66,400	66,400
027	Progression and deployment of Adult Social Care transformation projects: Assistive technology (e.g. Just checking)	The service user will still receive the care and support that they require although it might be delivered in a different way		100,000	100,000	100,000
028	Progression and deployment of Adult Social Care transformation projects: Domiciliary care (Medically Fit For Discharge, Rapid response domiciliary care, in-house service, single handed domiciliary care)	The service user will still receive the care and support that they need, although it may be funded differently or delivered in a different way		75,000	75,000	75,000
029	Progression and deployment of various Adult Social Care transformation projects e.g. Discharge to Assess (D2A) pathway	The service user will still receive the care and support that they need, although it may be funded differently or delivered in a different way		22,200	22,200	22,200
030	Introduce Administration Fee for full cost clients	No impact - Avoids cuts to services		25,000	25,000	25,000
031	Provide parking facilities at Edinburgh House	No impact - Avoids cuts to services		14,000	14,000	14,000
032	Reconfiguration of eye clinic	No impact - service users will still receive the care that they need		7,500	7,500	7,500
033	Reduction in licensing costs following discontinuing the use of care package assessment software	The service user will still receive the care and support they need		40,000	40,000	40,000

Appendix B

INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal				Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
<u>Director of Public Health</u>						
034	Review of the Wellbeing Service	The ongoing systems thinking review has highlighted opportunities for this service to work more efficiently. The ambition of the service is to create a city wide change in lifestyle behaviours with provision being targeted to those with the most significant needs. Work on channel shift will seek to improve the efficiency of the service through offering a digital platform for recording client interactions and offering clients self-management options where appropriate		114,000	114,000	114,000
035	Review of Tier 3 Weight Management provision	The service was established to prepare individuals for bariatric surgery (90% of service users April 15 - June 17 went on to surgery). However this is not aligned with the prevention role of public health in a system wide approach to obesity. Furthermore, in 2014, NHS England published commissioning guidance, outlining that Clinical Commissioning Groups were the preferred option as the primary commissioners for tier 3 weight management.		79,000	79,000	79,000
036	Improved efficiency in Sexual Health Contract (2% of contract value)	No impact - The reduction forms part of planned service efficiencies that have been agreed with providers as part of the process of procuring these services, and which have been built into the contract conditions for this service		43,000	43,000	43,000
Health and Social Care Total				1,096,600	1,096,600	1,096,600
<u>Housing</u>						
<u>Director of Property & Housing Services</u>						
037	Provision of a Housing Enabling Service and management of mobile home park to other local authorities	No adverse impact to services		33,000	33,000	33,000
038	Increase charge for the Telecare service	No adverse impact to services		48,000	48,000	48,000
039	Expand the scope of the Telecare Service into Telehealth provision	Expansion of chargeable service		20,000	20,000	20,000
040	Provision of the Housing Options Management Service to Other local authorities	No adverse impact to services		8,000	8,000	8,000
Housing Total				109,000	109,000	109,000

INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal			Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
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Planning Regeneration and Economic Development**Director of Property & Housing Services**

041	Income from Commercial Property Acquisitions	No impact - Avoids cuts to services	790,100	790,100	790,100
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Director of Regeneration

042	Additional rental income from Enterprise Centres	No adverse impact to services	25,000	25,000	25,000
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Planning Regeneration and Economic Development Total			815,100	815,100	815,100
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Resources**Director of Community & Communication**

043	Service and management review	No Impact - Already implemented	137,800	137,800	137,800
044	Saving following review of Voluntary and Community Sector Contract	Reconfigured service responding to consultation feedback	30,000	30,000	30,000
045	Review of Traded Services	Review in light of changing demands	20,000	20,000	20,000

Director of Culture & City Development

046	Income arising from additional room used for wedding ceremonies and increase in some other fees	No impact - Avoids cuts to services	30,000	30,000	30,000
047	Cemeteries income	Increase in fees whilst ensuring fee levels remain below the Hampshire average	10,000	10,000	10,000

Director of Finance & Information Technology

048	Reduction in Accountancy resources following investment in IT systems (e.g. Forecasting and Business Intelligence) leading to changes in the ways of working and facilitating a reduction in number of teams from 5 to 4	No Impact - Already implemented	80,700	80,700	80,700
049	Development of shared services arrangements with other organisations (primarily Payroll)	No impact - Business already acquired	55,000	55,000	55,000
050	Investment in Corporate Bonds	No Impact - Already implemented	66,000	66,000	66,000

Appendix B

INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal			Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
051	Introduction of charge for street naming & numbering service	Full year financial impact of saving implemented in 2017/18	10,000	10,000	10,000
052	IT Contract management - savings on external spend	Full year financial impact of saving implemented in 2017/18	15,000	15,000	15,000
053	Bringing current managed network monitoring contract in-house	Full year financial impact of saving implemented in 2017/18	12,500	12,500	12,500
054	Renegotiation of Tape Drive Back Up Contract	No impact - Avoids cuts to services	17,000	17,000	17,000
055	Income from IT related services and brokerage provided to external public sector organisations	No impact - Avoids cuts to services	25,000	25,000	25,000
056	IT Contract management review - Use of Crown Commercial Framework	No impact - Avoids cuts to services	5,000	5,000	5,000
057	Self service facility for IT helpdesk	No impact - Avoids cuts to services	32,000	32,000	32,000
058	Implement Microsoft 365	No impact - Avoids cuts to services	16,000	16,000	16,000
059	Reduction in systems support requirement following a systematic review of applications for cloud based solutions	No impact - Avoids cuts to services	20,000	20,000	20,000
<u>Director of Human Resources, Legal & Performance</u>					
060	Service review	No impact - Avoids cuts to services	25,000	25,000	25,000
061	In house provision of HR support to Port	No Impact - Already implemented	20,000	20,000	20,000
062	Income from trading and shared services	No impact - Avoids cuts to services	54,000	54,000	54,000
<u>Director of Property & Housing Services</u>					
063	Staffing Review - Landlord Maintenance	No adverse impact to services	50,000	50,000	50,000
064	Staffing Review - Security	No adverse impact to services	37,000	37,000	37,000
065	Additional external Income from Other LA energy works and external Health & Safety services	No adverse impact to services	30,000	30,000	30,000
Resources Total			798,000	798,000	798,000

INDICATIVE BUDGET SAVINGS 2018/19

Indicative Savings Proposal				Saving 2018/19 £	Saving 2019/20 £	Saving 2020/21 £
<u>Traffic and Transportation</u>						
<u>Director of Regeneration</u>						
066	Improvements in administration and new ways of working in parking service e.g. online processing of permits and renewals	No adverse impact to services		120,000	120,000	120,000
067	Reduction in non PFI Maintenance	Increased risk of delays in carrying out responsive repairs		50,000	50,000	50,000
068	Reduction in annual Tri-Sail maintenance budget	Any excess year on year spend would need to come from Sails reserve		15,000	15,000	15,000
069	Review of Transport Service Structure	Some reduction in capacity		60,000	60,000	60,000
070	Reduction in Subsidised Bus Routes	No Impact - Already implemented		35,000	35,000	35,000
071	Reduction in Passenger Transport administration costs	Less publicity and hard copy information material available to the public		10,000	10,000	10,000
072	Reduction of costs associated with opening new Traffic Management Centre	No adverse impact to services		15,000	15,000	15,000
Traffic and Transportation Total				305,000	305,000	305,000
<u>Other Expenditure</u>						
<u>Director of Finance & Information Technology</u>						
073	Repayment holiday on debt transferred as part of the 1997 Local Government Reorganisation	Same overall amount of funds set aside but over a longer period		269,000	269,000	269,000
Other Expenditure Total				269,000	269,000	269,000
Grand Total				4,000,000	4,000,000	4,000,000

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Title of meeting: Cabinet

Date of meeting: 11th December 2017

Subject: City Centre Road update and 'In principle' Compulsory Purchase Order resolution

Report by: Tristan Samuels - Director of Regeneration

Wards affected: All

Key decision: Yes

Full Council decision: No

1. Purpose of report

- 1.1 This report sets out the important role the city centre plays in accommodating the growth needs of the city. Given the substantial quantum of development which is allocated in the city centre new and improved infrastructure provision is necessary, including the reconfiguration of the highway network to the north of the city centre.
- 1.2 This report provides an update as to the progress of the related infrastructure project (the City Centre Road) and seeks approval of a series of recommendations to progress delivery of the City Centre Road project.

2. Recommendations

The Cabinet is recommended to:

- 2.1 Approve the land assembly strategy for the City Centre Road project as attached at Appendix 1.
- 2.2 Give delegated authority to the Director of Regeneration on the advice of the City Solicitor in consultation with the Leader with Portfolio responsibility for Planning, Regeneration & Economic Development to negotiate and complete acquisitions of legal interests, on the basis of the statutory CPO Compensation Code, in land required for the delivery of the City Centre Road scheme.
- 2.3 Give delegated authority to the Director of Regeneration to procure and appoint specialist advisers for:
 - Land referencing Agents
 - Specialist compulsory purchase surveyors

- 2.4 Approve the progress of all work necessary to establish a case for compulsory purchase of land required for the City Centre Road scheme.
- 2.5 Approve, in principle, the use of compulsory purchase powers for the acquisition of land to deliver the City Centre Road scheme (indicatively shown in red on the attached plan at Appendix 2) and note that the making of any compulsory purchase order will be subject to Members being satisfied in all respects that the criteria in paragraphs 3.19 have been met. Members are also asked to note that the redline area shown on the plan is currently widely drawn around the entire City Centre Road scheme application site area. It is not anticipated that all land/interests shown will need to be acquired to deliver the scheme however, a degree of flexibility prior to detailed technical approval of the scheme and its mitigation, is required at this stage. Officers will take all reasonable measures to minimise the need to acquire third party interests in accordance with CPO Guidance and the existing design approach to the scheme.
- 2.6 Note that Officers will need to seek a future resolution to grant the Director of Regeneration and the City Solicitor authority, in accordance with section 122 of the Local Government Act 1972, to declare that any land acquired or held and required for the delivery of the City Centre Road scheme may, where they conclude that it is no longer needed for its present purpose, appropriate the land for such statutory purpose as necessary to deliver the City Centre Road scheme, and to authorise the overriding of such easements, rights, or other adverse matters burdening the land, where that is needed to deliver the scheme, in reliance on section 203 of the Housing and Planning Act 2016.

3. Background

- 3.1. The Portsmouth Plan was adopted in January 2012 (the Local Plan). The aim of the Local Plan is to provide a positive planning framework for the successful regeneration the city. A main element of the development strategy of the Local Plan is to locate additional development at key development sites within the city centre, provide public transport hubs and routes to reduce reliance on the private car, and improve circulation, accessibility including pedestrian and cycle links and public realm. The level of growth achieved in the city will be dependant on the provision of new and improved infrastructure. A number of the main development sites in the city rely on a major amount of new transport infrastructure to provide access and create sustainable transport routes. Without this infrastructure these sites will only be able to accommodate lower levels of housing and the level of development for the city centre identified in the local plan.
- 3.2 The Local Plan identifies that the highway network in the city centre currently creates a very poor quality environment. It is not ideal for any road user, creates physical barriers which make it difficult to access several parts of the centre and, with the level of development anticipated along the western corridor, will lead to a great deal of congestion. The Local Plan policies support the reconfiguring of the highway network in the north of the city centre, to address these issues. The City Centre Road scheme

presents an ideal opportunity to improve the city centre for all road users, but particularly to increase public transport priority and create routes which will bring pedestrians, cyclists and bus passengers into the heart of the shopping area reducing congestion and addressing other issues such as air quality. The proposed City Centre Road would also improve the connectivity of the city centre, allowing easy access to the whole centre and thus opening up a number of sites for development. Finally, the City Centre Road scheme includes landscaping and design strategies which will create a high quality, pleasant and safe environment which in turn will increase its appeal to shoppers and investors and so increase the competitiveness of the city centre.

- 3.3 The Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. In order to ensure that new development delivers sustainable communities, and properly plans for and helps informs the infrastructure priorities for the city.
- 3.4 On the 1 April 2012 the Council became a Community Infrastructure Levy (CIL) Charging Authority under the Community Infrastructure Levy Regulations 2010 (as amended). The Council published a list (1st April 2012) of the infrastructure that would be funded or part funded through the CIL contributions, (the Regulation 123 List). The City Centre Road is one of the projects identified on the Regulation 123 List.
- 3.5 At present there is a £15m allocation available in the current approved capital programme for the City Centre Road scheme.
- 3.6 The City Centre Road scheme provides dedicated bus lanes and routes that allow buses to pass through the city centre core, unimpeded by private vehicles and through traffic, therefore delivering public transport to the heart of the city, increasing the potential attraction of the services and potentially securing a more sustainable future for the city. The scheme will also promote the expansion of patronage of the Park and Ride, as the buses operating from the site will be able to take advantage of routes that deliver people closer to their likely final destinations within the city centre.
- 3.7 The City Centre Road scheme provides highway changes that will deliver the following:
 - 3.7.1 Fundamental re-design of the City's most strategic access route into the City Centre, to the Naval Dockyard and beyond, which will strengthen the network connectivity both North to the "City Deal" development sites at Tipner and Horsea Island, as well as South to Gunwharf Quays (retail and leisure centre), the Historic Dockyard and the Seafront .
 - 3.7.2 A proposed new road layout that stretches from the bottom of the M275 to Unicorn Gate serving the western corridor. It is where the majority of traffic enters the City in the morning peak carrying just under half (46%) of all inbound traffic
 - 3.7.3 The opportunity for significant improvements in connectivity between the northern and southern part of Commercial Road, significant public realm improvements and cycle routes.

- 3.8 The current Local Plan identifies the City centre accommodation major growth for the plan period up to 2027. Within the city centre the Plan identifies the area can deliver the following:
- 50,000m2 retail floorspace
 - 9,500m2 Food and Drink
 - 1,600 dwellings
 - Hotel development
 - 10,000m2 office
- 3.9 The current Local Plan is under review, the City Centre is seen as an area of opportunity for further development.
- 3.10 A planning application for the City Centre Road scheme was submitted on 1st December 2017

Land Assembly

- 3.11 Whilst progress with property/interest owners has been made in discussing acquisitions and dedications of land that will be necessary to deliver the City Centre Road scheme, land assembly remains a critical issue for the delivery of the scheme. Clearly the road cannot be delivered across land that is not in the ownership of the Council and without this, certainty cannot be gained to the likely programme of delivery of the road scheme or the wider regeneration aspirations for the area.
- 3.12 The Council has already identified the principle landowners across the area and has commenced discussions with them regarding the acquisition of land required for the City Centre Road scheme. The Council already owns significant land holdings that will be needed for the proposed route, and wherever possible the scheme uses land already held for highways purposes.
- 3.13 To deliver the road as a single project however all relevant land interests will need to be brought in, in a timely way, meaning that a construction programme could only progress with certainty at a rate dictated by the timing of the last acquisition. The consideration of the potential need to use powers of compulsory acquisition is therefore considered to be essential, to facilitate delivery of the scheme in line with the Council's intended programme.
- 3.14 Not all land and property interests that may be affected by the scheme are immediately identifiable, even with reference to information at the land registry. Officers are therefore proposing the appointment and use of land referencing services, through which it will establish a comprehensive log of all land and property interests - these will include all freeholds, leaseholds, tenancies, easements, rights, and any other legal interests that may need to be acquired for delivery of the City Centre Road scheme. The outcome of the land referencing exercise will show all the relevant parties that the Council will need to enter into negotiations for the acquisition of their interests. It will also identify where there is land in unknown ownership which can only be acquired through compulsory purchase.

- 3.15 Whilst it is anticipated that further progress can be made on the negotiated approach for some parcels of land and legal interests it is good practice and appropriate to consider the use of compulsory purchase powers.
- 3.16 The government recognises in its *"Guidance on Compulsory Purchase"* dated October 2015, (the **CPO Guidance**), that if acquiring authorities wait for negotiations to break down, this can have detrimental impacts on the timing of delivery of public projects. Therefore, depending on when the land is required, the guidance considers it sensible for an acquiring authority to:
- 3.16.1 plan a compulsory purchase as a contingency measure; and
 - 3.16.2 initiate formal procedures.
- 3.17 Importantly, the CPO Guidance expressly recognises that such steps *"...help to make the seriousness of the authority's intentions clear from the outset, which in turn might encourage those whose land is affected to enter more readily into meaningful negotiations"*.
- 3.18 The CPO Guidance requires acquiring authorities to attempt to acquire land by agreement before embarking on the CPO process, although it is recognised that for schemes involving the acquisition of the number of interests, it is sensible to run the CPO process in parallel with ongoing negotiations.
- 3.19 This report seeks members support for a resolution 'in principle' for the use of compulsory purchase powers to assemble the City Centre Road scheme site, should all reasonable attempts to acquire the necessary land and interests fail. As the guidance makes clear, use of compulsory purchase powers is intended as a 'last resort'. Officers acknowledge that if any CPO was to be made, Members would require further updating and justification:
- that there was a compelling case in the public interest;
 - that there were no planning, funding or other legal impediments to the City Centre Road being delivered,
 - that all reasonable attempts to acquire all interests by agreement have not been successful;
 - for any interference with the human rights of those with an interest in the land affected; and
 - that any assessment of the impacts on residents, visitors and employees be measured and evaluated, with special focus on the likely effect of the proposals on those sharing protected characteristic (race, pregnancy, age, disability, gender reassignment, marriage/civil partnerships, religion/belief, sex, sexual orientation (as defined by the Equality Act 2010)) be made, in order for the Council to fully understand those impacts, and to consider measures to mitigate

impact, make reasonable adjustment, and foster good relations between those sharing protected characteristics, and those who do not.

- 3.20 The main benefit of the use of compulsory purchase is the certainty of being able to obtain vacant possession to a planned programme. This is absolutely vital in order give the Council confidence that the scheme will be delivered. The use of compulsory purchase also provides a level of certainty on project programming which in turn would allow the Council to enter into commercially sound construction contracts. This is because, once the CPO is confirmed and the legal challenge period has passed, the Order can be implemented and a date for vacant possession fixed in accordance with the project programme.
- 3.21 A Side Roads Order (SRO) is also likely to be required. A SRO gives powers to stop up, divert, provide as new or improve existing parts of the local highway network that crosses or enters the route of a proposed new classified road. They also provide powers to stop up and provide new means of private access to premises in relation to those new roads.
- 3.22 A resolution approving the 'in principle' use of compulsory purchase powers at this stage in the process, will demonstrate the Council's commitment to the timely delivery of the City Centre Road and its related benefits.
- 3.23 The Council has appointed Pinsent Masons, a leading law firm to advise on all legal aspects of the City Centre Road scheme and a land assembly strategy has been developed which includes advice on CPO. Legally privileged and confidential advice prepared by Pinsent Masons is attached to this report at appendix 3 (this is an exempt confidential appendix). Should the Council seek to progress a CPO/SRO, it will have regard to the advice set out in the CPO Guidance, DfT Circular 1/97 and the advice of its appointed legal advisors.
- 3.24 The key target dates for the City Centre Road scheme are:
- Planning application submission - 1st December 2017
 - In principle CPO/SRO decision - 11th December 2017
 - Target planning application determination - March 2018
 - Construction commences - 2019
- 3.25 Whilst the monies allocated in the Capital Programme do not cover the total cost of the road the Council are considering a range of different funding options. As already identified the road is one of the key infrastructure projects identified on the CIL 123 list and considerable monies have been collected though CIL charging to date. There are currently a series of funding bids which currently include a bid to the LEP, bids to the Housing and Infrastructure Fund (Marginal Viability and Forward Funding bids) the National Infrastructure and Productivity Fund and the Growth and Housing Fund. A series of other funding options are currently being explored

4. Reasons for recommendations

- 4.1 The main body of the report gives specific details to the background of the recommendations all of which are considered by officers as important to ensure the timely delivery of the City Centre Road scheme and its associated regeneration benefits.

5. Equality impact assessment

- 5.1 The Equality Act 2010 requires that that impact of the recommendation on residents, visitors and employees be measured and evaluated, with special focus on the likely effect of the proposals on those sharing protected characteristic (race, pregnancy, age, disability, gender reassignment, marriage/civil partnerships, religion/belief, sex, sexual orientation (as defined by the Equality Act 2010)) be made, in order for the Council to fully understand those impacts, and to consider measures to mitigate impact, make reasonable adjustment, and foster good relations between those sharing protected characteristics, and those who do not.
- 5.2 The Council's Equalities Officer has examined the recommendations undertaking an initial screening, concluding that at this stage there are unlikely to be equality, diversity/cohesion and integration impacts - that there is no need for a full assessment to take place, but that, in relation to any future decision to *make* a CPO a comprehensive review of the impact on human rights, and equalities will need to take place, with appropriate analysis, survey, and report prepared for the decision maker - including proposed adjustment and mitigation.

6. Legal comments

- 6.1 Section 120 of the Local Government Act 1972 authorised the Council to acquire by agreement any land for the benefit, improvement, or development of the Council's area or for purposes of any of the Council's functions under any enactment, notwithstanding that the land is not immediately required for such purposes.
- 6.2 Sections 239, and 240 of the Highways Act 1980 (the Act) are the principle powers covering the acquisition of land for the construction of new highways and the improvement of existing highways. Section 240(2) of the Act authorises the Council to acquire compulsorily or by agreement any land which is required for use by the Council in connection with the construction or improvement of highway. Section 246 authorises the acquisition of land in advance of requirement (the Council may not need to rely on this if no land is required in advance), section 249 relates to distances limits for land acquisition for various purposes, section 250 authorises the acquisition of new rights, and section 260 relates to the inclusion in a CPO of land acquired by agreement where it is necessary to override the effects of a restrictive covenant or other third party right. Sections 14 and 125 are the main relevant powers where a side roads order is required.
- 6.3 The precise suite of powers required will be settled upon once land requirements and other matters relating to the road are finally determined.

7. Director of Finance's comments

- 7.1 The total cost of enabling the new City Centre Road including any land acquisition costs for the Road (but excluding any land acquisition costs for the development parcels), all construction, fees and contingencies is estimated to be £70m. The Council has, thus far, committed £15m of its own funding towards this scheme.
- 7.2 The scheme and its enabling development are expected to deliver a significant transformational economic boost for the City. So long as the scheme can be demonstrated to be deliverable (e.g. in terms of planning, land assembly, procurement and cost), there is a good degree of confidence that the Council will be able to attract the funding shortfall in order to fulfil the scheme.
- 7.3 At present, the Council has made multiple bids to a number of Housing and Infrastructure related funds as follows:
- Housing Infrastructure Fund (DCLG / HCA) - Marginal Viability
 - Housing Infrastructure Fund (DCLG / HCA) - Forward Funding
 - National Productivity Investment Fund (DfT)
 - Growth and Housing Fund (Highways England)
- 7.4 Whilst there remains a degree of uncertainty regarding the overall funding of the scheme, it is important in terms of being able to demonstrate commitment and deliverability to Government / Local Enterprise Partnership (as funders). The proposals within this report relating to land acquisition are expected in the first instance, to be funded from within the Council's contribution to the scheme. Acquisitions will only be made with due regard to the following:
- There remains reasonable confidence that full funding for the scheme will be achievable
 - Overall value for money
 - Where acquisition is time critical for the delivery of the scheme, generally
 - Where acquisition is time critical and where not to acquire would compromise grant funding
- 7.5 Such an approach will ensure that only necessary costs are incurred prior to the scheme achieving full funding.

.....
Signed by:

Appendices:

Appendix 1 - Acquisition Strategy

Appendix 2 - Red line plan

Appendix 3 - Confidential advice note from Pinsent Masons (exempt for publication, s100A of the Local Government Act 1982 Schedule 12A, paragraph 3)

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by on

.....
Signed by:

Appendix 1

Acquisition Strategy



City Centre Road

30/11/2017

1. Introduction

1. This report sets out the Land Acquisition Strategy, which will be used in order to facilitate the construction of the City Centre Road.
- 1.2 The strategy sets out the various methods of land acquisition available to the City Council in order to facilitate the City Centre Road, and will provide some suggestions as to the most appropriate method of acquisition in varying circumstances.
- 1.3 Whilst the City Council will work to acquire all necessary property interests by agreement, this land acquisition strategy includes the potential use of compulsory purchase powers.

2. Acquisition Options

2. There are three principal options for acquisition available to the City Council to ensure vacant possession of the site for the construction of the City Centre Road, these are:

- Acquisition by agreement
- Determination of leasehold interests using Landlord and Tenant powers
- Appropriation
- Compulsory Purchase

- 2.1 Each method has its benefits and it is envisaged that they will all be used in combination to ensure that vacant possession of the site is delivered at the required time in a cost-effective manner.

Acquisition by Agreement

- 2.2 This option provides the acquiring body with the first opportunity to secure the necessary agreement with parties owning interests in required land.

- 2.3 The benefits to the property owner are that it allows for a greater level of flexibility between parties on timing and consideration. The ability of affected parties to have sufficient time to identify, secure and relocate to alternative premises often allows for the mitigation of potential compensation. One of the benefits to the acquiring authority is achieving early certainty in terms of both timing and cost.

- 2.4 Clearly this method is only effective where there is a willing seller. Where an owner of a property interest does not wish to sell, or has an unrealistic expectation of terms, it is unlikely that any acquisition by agreement will be achieved.

Landlord and Tenant

- 2.5 Where the City Council owns a superior interest, it may be possible to acquire inferior leasehold interests using the landlord and tenant powers. The ability for the City Council to do this will depend on the specific wording within the leases.

- 2.6 The main benefit to the City Council undertaking land assembly is that compensation liabilities can be significantly reduced in line with either the agreed terms in the lease or the statutory compensation of multiples of rateable value under Landlord & Tenant legislation.

- 2.7 Limitations of this method include issues of both timing and certainty. Unless a lease contains specific provision for termination for construction of the road the City Council must wait until expiry of the term of the lease.

Appropriation

- 2.8 Section 122 of the Local Government Act 1972 (Appropriation of land by principal councils) gives the City Council power to appropriate land held by it for any purpose to another purpose.

- 2.9 Where land is acquired or appropriated by the City Council for the purposes of the construction of the City Centre Road, it may take advantage of the provisions of section 203 of the Housing and Planning Act 2016, enabling restrictive covenants and other adverse matters to be over-ridden.
- 2.10 The interests and rights that can be over-ridden include any easement, liberty, privilege, right or advantage annexed to land or adversely affecting other land, including any natural right of support.
- 2.11 The provisions are broader than those found in the former section 237 of the Town and Country Planning Act 1990 and can apply where land could be acquired compulsorily. There must, however, be planning consent for the building or maintenance work or use involved, and the building or maintenance work or the use must be for purposes related to the purposes for which the land was vested, acquired or appropriated. Under section 204 of the 2016 Act, there is an obligation to make payment of compensation for interference with any such matters.

Compulsory Purchase

- 2.12 Under s239 of the Highways Act 1980, Portsmouth City Council may use its compulsory purchase powers to acquire land for the purposes of the construction of a highway. If the City Council decide to use these powers, they must follow the statutory process set down in the Acquisition of Land Act 1981.
- 2.13 The main benefit of the use of compulsory purchase for the City Council is the certainty of being able to obtain vacant possession. Once the Order is confirmed, and the legal challenge period has passed, Notices can be served, and a date for vacant possession is fixed. Despite the relatively long process for making and confirming an Order, use of an Order may also have benefits in terms of securing a site within a shorter amount of time than by the other two methods set out above.
- 2.14 The benefits for property owners are that there is a clearly defined statutory system for their objections to be heard prior to confirmation, and a statutory framework for compensation for their losses once the Order is confirmed.
- 2.15 The potential difficulties in the use of compulsory purchase include the time taken to conclude the statutory process, the expense of the making and confirmation of a compulsory purchase order, and the level of uncertainty which exists until the order is actually confirmed.

3. Application

- 3.1 As has been discussed above, a combination of all the methods will be appropriate for the acquisition of the entire site required for the new City Centre Road.
- 3.2 Prior to acquiring any land, it is vital to have a schedule showing a comprehensive list of all property interests within the development site.
- 3.3 The first stage of the land acquisition process would be to make a record of all the property interests, which are owned or controlled by the City Council.
- 3.4 The City Council has produced a plan detailing property and land already within its ownership as well as land which is Highway and which will remain Highway following the completion of the City Centre Road. This land does not need to be acquired if it will remain as Highway.

Acquisition using Landlord & Tenant powers

- 3.5 The next step in the land acquisition process is to examine land where the City Council have an interest to see whether there are any inferior property interests which could be acquired using landlord and tenant provisions
- 3.6 If any interests are found which meet these criteria, then a schedule can be drawn up of when relevant notices need to be served in order to provide vacant possession when required. It may also be appropriate to notify those affected in the early stages that this is what their landlord intends.

Acquisition by Agreement

- 3.7 This is the preferred method of acquisition.
- 3.8 The City Council will need to identify any property interests within the site that are on the market. If property interests are on the market, and can be acquired at a reasonable cost, then they should be acquired. It may be possible to enter into conditional contracts or take options in order to secure the property interest rather than an outright purchase at an early stage.
- 3.9 The remainder of the interests within the site should be contacted in order to initiate attempts to acquire by agreement. This process can obviously be prioritised depending on the type of interest held. It should be recognised that there may be more than one property interest in some properties, and that the acquisition by agreement of a superior interest may allow the determination of an inferior interest using landlord and tenant powers.
- 3.10 At an early stage a 'stock letter' should be sent to all affected parties initiating contact and explaining the City Councils intentions to negotiate acquisitions by agreement. This process of regular correspondence should be continued throughout the duration of the project.

Small Investment Owners, Owner occupiers and large space users

- 3.11 The City Council will put together a schedule showing available relocation properties within the local area including all of the various land uses which are within the development site. This schedule needs to be updated regularly throughout the entire land acquisition process.
- 3.12 This schedule will provide the basis of negotiations with occupiers to purchase their interests. It should provide a useful information source for all those who are affected by the scheme in their attempts to find relocation premises. This will significantly reduce the risk of businesses having to extinguish due to their inability to find relocation premises, and assist in achieving continuous trading for relocating businesses.
- 3.13 The City Council should work with the affected occupiers to identify appropriate relocation opportunities and be prepared to indemnify occupiers for the reasonable costs of acquiring and holding relocation properties, such as agents or legal fees.
- 3.14 The main concern of small investment owners will be to obtain the right value for their interest. If agreement can be reached on this value, it is likely that a deal can be agreed.
- 3.15 Owner occupiers are likely to have two main concerns, achieving the appropriate value for their property interest, and finding appropriate relocation premises. If both of these issues can be resolved, it is likely that a deal can be agreed. The owner-occupier is likely to reserve their rights to claim disturbance compensation, which is difficult to assess at this early stage.
- 3.16 The main concern of a large or unusual space occupier is likely to be finding appropriate relocation premises. If these can be found, it is likely that agreement can be reached more easily on issues of the value of the property interest and disturbance compensation. Early discussion with these occupiers is particularly important in order to avoid businesses extinguishing or ceasing trading for a short time whilst relocation takes place.

Leaseholders and occupiers

- 3.17 The main concerns of these occupiers will be finding appropriate relocation premises. The City Council will work with the affected occupiers to identify appropriate relocation opportunities and be prepared to indemnify occupiers for the reasonable costs of acquiring and holding relocation properties. The schedule of available property discussed at paragraph 3.11 above will be very useful in these discussions.
- 3.18 Once appropriate relocation premises have been identified, it is more likely that agreement can be reached on any other costs incurred.

Appropriation

- 3.19 To enable site assembly to be achieved for the City Centre Road, it will be necessary for the City Council to appropriate for highway use certain land and interests it currently holds, within the proposed site area, for other statutory purposes, together with any land it acquires (whether by agreement or compulsorily) for the scheme.
- 3.20 It is also necessary for the City Council to authorise the use of powers contained in section 203 of the Housing and Planning Act 2016 to override easements, rights and other adverse

matters burdening the land, subject to the payment of compensation under section 204 of that Act.

Acquisition by Compulsory Purchase

- 3.21 Compulsory purchase forms the third process of acquisition.
- 3.22 Compulsory purchase is often seen as a last resort by acquiring authorities, to be used only when all other options have failed. It should never be seen as a first option.
- 3.23 Government guidance supports the use of compulsory purchase to secure highways schemes. It recognises that, due to the time taken to make and confirm a compulsory purchase order, it may be appropriate to run the compulsory purchase process in parallel with other efforts to acquire interests in property. This also demonstrates the seriousness of the City Council, and can help to move negotiations forward.
- 3.24 Therefore, whilst the City Council explores all reasonable options for acquiring the necessary land as set out above, the City Council will make preparations to make a compulsory purchase order to facilitate the new link road. Negotiations to acquire by agreement will continue throughout this process.

4. Conclusions

- 4.1 The City Council will use their landlord and tenant powers where appropriate to acquire control of property interests required for the City Centre Road.
- 4.2 Where property interests are available on the market at present, the City Council will make reasonable attempts to acquire them by agreement.
- 4.3 The City Council will make reasonable attempts to acquire any remaining property interests by agreement.
- 4.4 The city council will prepare and maintain a schedule of all available property for relocation. They will work with affected occupiers to identify and secure relocation property where appropriate.
- 4.5 The city council is prepared to consider use of its compulsory purchase powers to acquire property interests required for the City Centre Road.
- 4.6 Anyone who is potentially affected by the scheme, or has questions concerning land assembly, should be directed to;

Tom Southall MRICS
Tom.southall@portsmouthcc.gov.uk

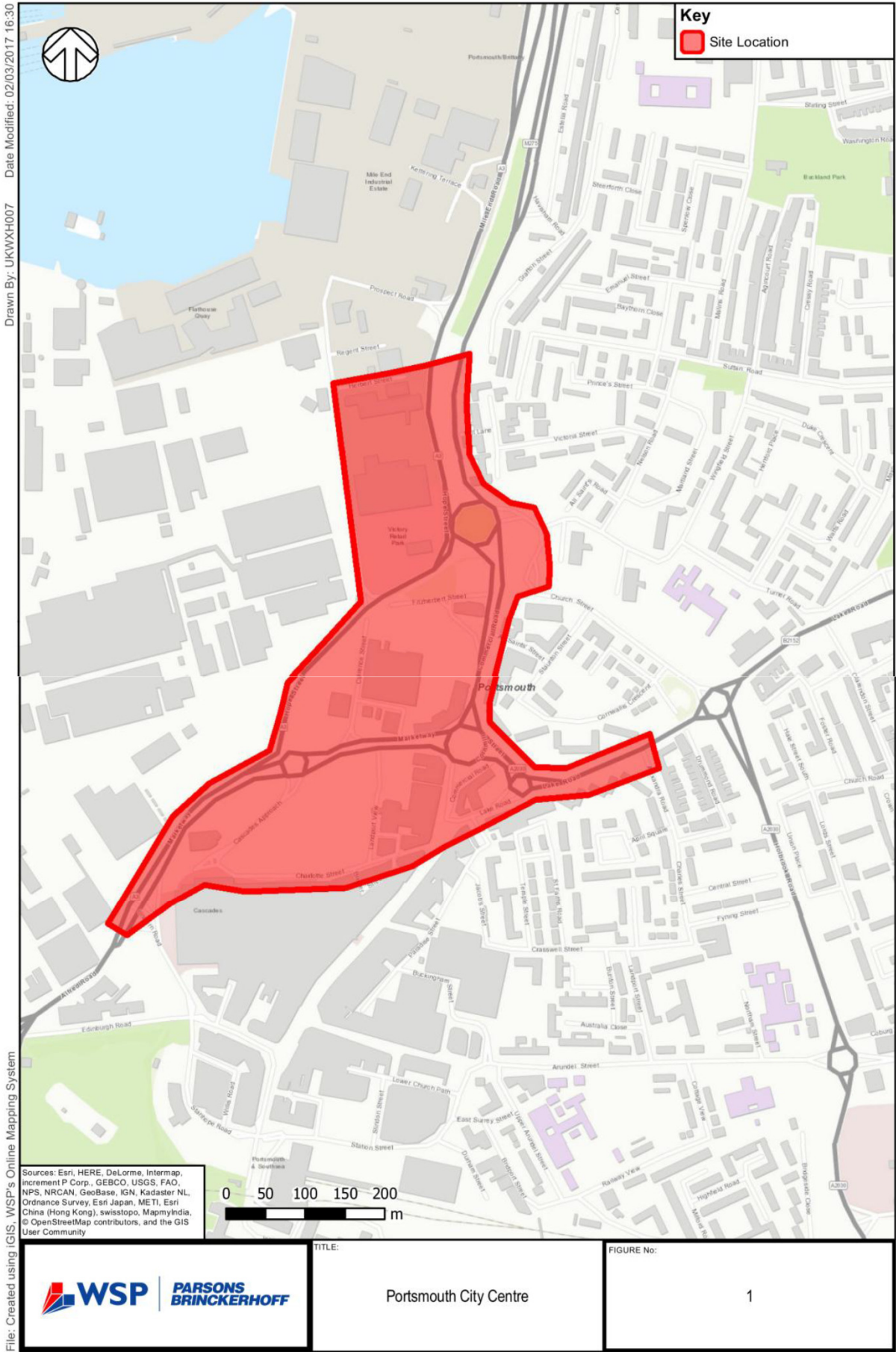
Tel: 023 9283 4149

Catharine Ireland MRICS
Catharine.ireland@portsmouthcc.gov.uk

Tel: 023 9283 4149

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Appendix 2 Indicative Red Line Plan



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