

**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	<a href="http://www.legislation.gov.uk/ukxi/2012/767/contents/made">http://www.legislation.gov.uk/ukxi/2012/767/contents/made</a>

## 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.