



SUPPLEMENTARY AGENDA

CABINET

WEDNESDAY, 15 MAY 2024 AT 2.00 PM

COUNCIL CHAMBER - THE GUILDHALL, PORTSMOUTH

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Membership

Councillor Steve Pitt (Chair)
Councillor Suzy Horton (Vice-Chair)

Councillor Dave Ashmore
Councillor Kimberly Barrett
Councillor Ian Holder
Councillor Lee Hunt

Councillor Hugh Mason
Councillor Darren Sanders
Councillor Gerald Vernon-Jackson CBE
Councillor Matthew Winnington

The above details the Cabinet membership as at agenda publication on 7 May 2024. The Leader will formally confirm the Cabinet for 2024/25 in due course (as it is within their gift). Therefore, this agenda has been issued to all councillors, thereby providing them with the summons for the meeting should they be appointed to the Cabinet.

(NB This supplementary agenda should be retained for future reference with the main agenda and minutes of this meeting).

SUPPLEMENTARY AGENDA

Portsmouth Local Plan - Appendices 1 to 5 (Pages 3 - 704)

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Agenda Item 5

Pre-Submission Portsmouth Local Plan 2020-2040

DRAFT

March 2024

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Chapter 1: Introduction

What is the Portsmouth Local Plan?

1.1 The Portsmouth Local Plan is the statutory development plan for Portsmouth and it will guide development in the City up to 2040. Adopted minerals and waste plans and the 'made' neighbourhood plan for Milton also form part of the development plan for Portsmouth. The planning system in this country is plan-led and statute states that decisions on planning applications must be taken in accordance with the development plan unless material considerations indicate otherwise. Accordingly this Local Plan will be used in the determination of planning applications in Portsmouth.

What does the Portsmouth Local Plan seek to achieve?

1.2 The Portsmouth Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision¹.

1.3 The Local Plan sets out how the City Council believes the City should develop. It allocates the strategic sites that are fundamental to achieving the 2040 Vision and a number of other allocations. It includes City-wide policies against which all individual planning applications will be assessed. It identifies the required physical and social infrastructure necessary to support new development and meet future needs. The Local Plan was prepared mindful of risks and changes and it allows for flexibility to ensure the vision and objectives are met.

What makes Portsmouth unique?

1.4 Portsmouth is unique in a number of ways, which each bring its own issues and challenges.

1.5 Portsmouth is the UK's only island city. However, the City boundary extends on to the mainland and its highest point is at Fort Southwick on Portsdown Hill at 131 metres above sea level. Portsea Island is separated from the mainland by Portsbridge Creek. Southsea Seafront looks out on the Solent, while Portsmouth Harbour and Langstone Harbour are located to the west and east respectively.

1.6 Portsmouth is the UK's most densely populated city outside London. Portsmouth is home to approximately 208,100 people living on a land area of just 40 square kilometres. It is obvious that there are no opportunities for urban extensions and there are very few large sites available for development.

1.7 Portsmouth has been the home of the Royal Navy since the twelfth century and the armed forces form a significant part of the City's fabric. An estimated 37,600 people in Portsmouth are members of the armed forces community representing 18% of the total population².

1.8 Most of Portsmouth is extremely flat, low lying and is located next to the sea. It is therefore one of the UK's cities most vulnerable to flooding. Coastal defence schemes are underway for North Portsea Island and Southsea.

¹ <https://imagineportsmouth.co.uk/>

² <https://www.royalnavy.mod.uk/our-organisation/bases-and-stations/naval-base/portsmouth>

1.9 Despite its highly urban nature, Portsmouth is surrounded by statutory sites designated for their conservation interest. The sites have a special significance for their breeding bird populations of terns, overwintering bird populations of international importance and a range of rare maritime and coastal habitats.

1.10 Last but not least, Portsmouth was named the UK's second coolest city to live in 2022 by the Nomads Nation website³. Portsmouth was beaten only by London, while coming ahead of traditionally hipster places such as Brighton, Edinburgh and Manchester.

What time period does the Local Plan cover?

1.11 The plan period for the Portsmouth Local Plan is 2020-2040. This is in line with the Imagine Portsmouth 2040 vision and national policy that requires strategic policies to look ahead over a minimum fifteen year period from adoption.

What is the Policies Map?

1.12 The Policies Map illustrates how the policies in the development plan will apply. It shows the boundaries for all allocations in the City. It shows where specific policies apply, such as town and local centres. It also shows, where practicable, other planning constraints, for example, international, national and local nature conservation designations. It does not show all constraints and reference should be made to relevant websites, for example, the Environment Agency website which has up to date flood zone mapping.

1.13 The Policies Map is not itself part of the statutory development plan. It will therefore be edited as required to reflect updated information, for example, the making of further neighbourhood plans.

What is the structure of the Local Plan?

1.14 The Local Plan includes a vision, objectives and policies, which together provide a planned framework for assessing planning applications and guiding development in the City. The structure of the Local Plan is as follows:

- The Imagine Portsmouth 2040 Vision sets out how we want the City to be like in 2040. A set of objectives act as stepping stones between the Vision, the Development Strategy and the policies.
- The Development Strategy sets out how the Local Plan will help to achieve the 2040 Vision illustrated within the Key Diagram. The core policies address the climate emergency and set out the City Council's expectations on excellent quality design.
- The Strategic Site allocations are fundamental to achieving the 2040 Vision for the City and each Strategic Site will deliver on specific Local Plan objectives.
- The Site Allocations will deliver significant numbers of new homes in the City and other multiple benefits.
- City-wide strategic and development management policies are set out in these six chapters: Homes, Thriving Economy, Climate Emergency, Greening the City, Infrastructure and Heritage.
- The housing and economic development targets are the first policies in the chapters on Homes and the Thriving Economy.

³ <https://nomadsnation.com/best-places-to-live-in-the-uk/>

- The final chapter of the Local Plan explains how the policies will be reviewed and monitored.
- There are four appendices. The first lists all the development plan policies that will be superseded by this Local Plan, the second and third identifies small and medium sites for housing and the fourth sets marketing requirements for change of use applications.
- The Glossary explains technical terms used in the Local Plan.

What are the statutory requirements for the preparation of the Local Plan?

1.15 The statutory requirements for the preparation of local plans are set out in the Planning and Compulsory Purchase Act 2004⁴ and the Levelling Up and Regeneration Act 2023⁵. Guidance is contained in the National Planning Policy Framework⁶ (NPPF) and Planning Practice Guidance⁷. Local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. The tests of soundness are that it is positively prepared, justified, effective and consistent with national policy.

How should the Local Plan be used?

1.16 It is important that the Local Plan is read as a whole. All its policies should be viewed together and not in isolation in the preparation and consideration of planning applications. All relevant development plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in this Local Plan do not list or cross reference all other policies that may be relevant.

What evidence supports the Local Plan?

1.17 All the Local Plan policies are underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the policies concerned and takes into account relevant market signals. A Whole Plan Viability Assessment⁸ was carried out, which tested the ability of a range of types of development to viably meet Local Plan requirements and the Community Infrastructure Levy. Statements of Common Ground were prepared for each of the allocations, which provide evidence that the development proposals are both viable and feasible. An Integrated Impact Assessment⁹ was prepared to assess the negative and positive impacts that the proposed policies would have on overarching matters such as income deprivation and poverty; changes were made to the Local Plan where appropriate. All the supporting documents relevant to the preparation of this Local Plan form the Core Document Library¹⁰, which is published on the City Council's website.

⁴ <https://www.legislation.gov.uk/ukpga/2004/5/contents>

⁵ <https://bills.parliament.uk/bills/3155>

⁶ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

⁷ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁸ <https://www.portsmouth.gov.uk/newlocalplanevidencedoce>

⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Appendix_5_Integrated-Impact-Assessment-IIA.pdf

¹⁰ <https://www.portsmouth.gov.uk/newlocalplanevidence>

Sustainability Appraisal

1.18 The purpose of a Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Local Plan. Both the Local Plan and its SA meet the requirements of the Strategic Environmental Assessment Directive. The City Council considers that this plan sets out an appropriate strategy for development in Portsmouth taking into account the reasonable alternatives. The policies and sites identified in the Local Plan have been appraised against sustainability objectives on an iterative basis. These iterations identify how emerging policies help to achieve the relevant social, environmental and economic objectives, and recommend how sustainability could be improved. These recommendations have been taken into account in the drafting of this Local Plan.

Habitat Regulation Assessment

1.19 The objective of the Habitat Regulation Assessment (HRA) is to identify any aspects of the Local Plan that would cause Likely Significant Effects on, or adverse effects on the integrity of internationally designated nature conservation sites. The assessment is undertaken alone and where necessary in-combination with other plans and projects. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment is required where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects. Should the HRA identify potential adverse effects, it also advises on appropriate policy mechanisms for delivering mitigation. Due to the allocation of Tipner West and Horsea Island East, it has not proved possible to avoid or mitigate all adverse effects on integrity. Therefore a further stage of the HRA has been required that sets out a series of derogation tests, which must be passed before the Local Plan can be adopted.

1.20 The City boundary comprises several international sites designated for their nature conservation interest namely: the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar, the Solent & Dorset Coast SPA and the Solent Maritime SAC. Further European sites lie within 10 km of the City's boundary, including the Solent & Isle of Wight Lagoons SAC and the Solent & Southampton Water SPA / Ramsar. The wider Solent area is generally regarded as a region of significant ecological value and sensitivity. Given the urban nature of southern Hampshire, an extensive evidence base relating to potential impact pathways has been developed. Furthermore, there are well-established issues, for example, recreational disturbance and functionally linked habitat loss for which strategic mitigation measures have already been developed including Bird Aware Solent.

How were people consulted on the Local Plan?

1.21 The views and input of the local community and key stakeholders are vital to the City Council and there has been a considerable amount of public engagement on the Portsmouth Local Plan. All rounds of consultation have been in line with the Statement of Community Involvement¹¹ and the Local Plan Regulations¹². The following

¹¹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/statement-of-community-involvement/#:~:text=The%20Statement%20of%20Community%20Involvement,managing%20new%20development%20in%20Portsmouth.>

¹² <https://www.legislation.gov.uk/ukxi/2012/767/contents/made>

consultations have taken place and all the responses were analysed and helped inform the final version of the Plan:

- Issues and Options¹³ (2017)
- Local Plan Evidence Base¹⁴ (2019)
- Tipner Strategic Development Area¹⁵ (2019)
- Portsmouth Local Plan 2038 Regulation 18 Consultation Document¹⁶ (2021)

1.22 There have also been bespoke consultations on specific aspects of the Local Plan, such as the Infrastructure Delivery Plan and the Viability Assessment.

How does the Local Plan relate to neighbourhood plans?

1.23 The Local Plan establishes the strategic planning policy framework for neighbourhood plans and Neighbourhood Development Orders, including Community Right to Build Orders. At a local level, neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. When a neighbourhood plan is 'made' (adopted), it becomes part of the development plan for the City. Its policies will be used to determine planning applications within its designated area alongside the Local Plan and mineral and waste plans.

1.24 All neighbourhood plans need to be in general conformity with the core and strategic policies in the Local Plan. They can allocate land for development in line with these policies and can also formulate development management policies specific to their areas. The focus of neighbourhood planning should be on guiding development rather than stopping it.

1.25 At the time of Local Plan adoption, there was one made neighbourhood plan namely the Milton Neighbourhood Development Plan (2021 - 2036)¹⁷.

Duty to Cooperate

1.26 The City Council has worked collaboratively with many other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in this Local Plan. Evidence of this is provided in the Duty to Cooperate Statement¹⁸ published at the same time as this Plan.

1.27 The principal way in which Portsmouth City Council meets the Duty to Cooperate is through its active membership of the Partnership for South Hampshire (PFSH). This sub-regional partnership of twelve local authorities around the Solent aims to improve the environmental, cultural and economic performance of the South Hampshire area. PFSH works with partners to dissolve the boundaries of individual local authorities and to make the most of the opportunities that can be shared across the wider South Hampshire area. The Portsmouth Local Plan takes account of wider issues and opportunities affecting the PFSH sub region. PFSH strategies are referenced as relevant in the Plan although these

¹³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Issues-and-Options.pdf>

¹⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Update.pdf>

¹⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf>

¹⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf>

¹⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/10/Milton-Plan-Final-adopted.pdf>

¹⁸ <https://www.portsmouth.gov.uk/newlocalplanevidencedoch>

are non-statutory and therefore can only inform decision making. A PfSH Statement of Common Ground is agreed annually by the local planning authorities.

1.28 Several bilateral Statements of Common Ground have been agreed with individual neighbouring local authorities. These are referenced in the Duty to Cooperate Statement along with an explanation of how they have helped to shape Local Plan policies.

What does the Portsmouth Local Plan replace?

1.29 The Portsmouth Local Plan supersedes the following development plan documents and all their policies:

- The Portsmouth Plan (Core Strategy) adopted in 2012
- Saved Policies from the Portsmouth City Local Plan 2001-2011 adopted in 2006
- Southsea Town Centre Area Action Plan adopted in 2007
- Somerstown and North Southsea Area Action Plan adopted in 2012

1.30 Appendix 1 of this Local Plan lists all the policies in the above named plans that will be superseded and what they will be replaced by.

Does the Local Plan deal with minerals and waste?

1.31 Portsmouth City Council is the minerals planning authority and the waste planning authority for the City. We work with our partner authorities namely Hampshire County Council Southampton City Council, New Forest National Park Authority and South Downs National Park Authority (collectively known as the Hampshire Authorities) to prepare minerals and waste plans. This Local Plan does not deal with minerals and waste, but its policies are, when relevant, a material consideration in the determination of minerals and waste applications.

How will the Local Plan be monitored and reviewed?

1.32 The final chapter of the Local Plan explains how it will be monitored and reviewed. Annual monitoring will be undertaken as part of the Council's Authority Monitoring Report¹⁹ and if appropriate, a review or partial review of the Plan will be undertaken to ensure it is responsive to any changes in circumstances.

¹⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-applications/annual-monitoring-reports/>

Chapter 2: Vision & Objectives

2.1. The Portsmouth Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision²⁰:

In 2040 Portsmouth will be an island city with an incredible waterfront, a rich cultural heritage and a strong maritime history. With a naval base, international port and strong local links across the south, we are the centre of culture and enterprise for our area. In 2040 we are very proud of Portsmouth, how we behave towards each other and how it feels to live here.

- 2.2. The Imagine Portsmouth Vision was the culmination of two years' work by the City Council. It brought together around 2,500 people representing residents, businesses and organisations, who lived and worked in Portsmouth. They talked about their hopes and dreams for their city. They created big, bold plans for what they wanted in the future for themselves, their families, their communities, their businesses and their co-workers.
- 2.3. The City Council adopted the Portsmouth 2040 Vision in January 2021. The Portsmouth Local Plan is about implementing this Vision through both its allocations and its City wide policies.
- 2.4. We have developed six strategic objectives from this high level vision. These objectives are the stepping stones between the high level Vision and our Local Plan policies. They will deliver the Vision within the remit of the Local Plan and the consideration of planning applications. All six objectives are important and they are all interlinked. They are therefore being considered holistically in the Local Plan and in the determination of planning applications.
- 2.5. Each strategic objective is illustrated with an icon. Each Local Plan policy achieves one or more of the strategic objectives. We illustrate this with icons throughout the Local Plan by showing which strategic objective a particular policy will address. For, example, the Strategic Site allocation of Tipner East with its proposed new homes and transport interchange seeks to deliver 'a healthy and happy City' and 'a City with easy travel.' An example of a City-wide policy delivering on the objectives is the strategic policy on biodiversity net gain, which seeks to deliver on 'greening the City.'
- 2.6. The strategic objectives for the Portsmouth Local Plan are illustrated in figure 2.1 and explained in more detail below.

²⁰ <https://imagineportsmouth.co.uk/the-vision/>



Figure 2.1: Local Plan objectives

A healthy and happy City 

2.7. We do everything we can to enhance wellbeing for everyone in our city by offering the education, care and support that every individual needs for their physical and mental health. All our residents and communities live in good homes where they feel safe, feel like they belong, and can thrive.

A City rich in culture and creativity

2.8. People in Portsmouth enjoy a vibrant cultural scene that makes the most of our location, our heritage and our creative energy. We are full of things to do and places to be, welcoming locals and visitors with diverse events, attractions and venues that positively benefit our people and our City. We are known locally, regionally and internationally as a great waterfront and City destination that brings people together.

A City with a thriving economy

2.9. Portsmouth supercharges local businesses and entrepreneurs and attracts investment nationally and internationally from businesses of all sizes. We build strong partnerships between employers and people to develop an excellent skills base and offer brilliant career opportunities to young people, students and adults, growing a better future for us all.

A City of lifelong learning

2.10. Our young people are encouraged to develop high, positive aspirations, and are fully invested in to make the most of their talent and potential. Adults have a wide range of education opportunities to choose from at every stage of life that empower them and enrich their lives.

A green City

2.11. We have excellent air quality because of our green spaces and sustainable transport, and this means our people live healthy and active lives. We are carbon neutral, use renewable energy and actively work to address climate change. We protect and enhance both our land and maritime environment for future generations.

A City with easy travel

2.12. Fewer journeys are made by car because we have excellent public transport connections between bus, train, cycling and walking routes, making it easier and more enjoyable to be out and about. We encourage and support more walking and cycling, and we make it easy for people to travel regionally, nationally and internationally for work and pleasure.

Chapter 3: Development Strategy & Core Policies

Introduction

3.1 This chapter sets out the development strategy for the Local Plan and a key diagram showing the island geography of the City. It sets out the targets for both new homes and jobs in the City along with details of unmet need. It introduces the Partnership for South Hampshire²¹ (PfSH), which is the main mechanism for meeting the Duty to Cooperate in the sub-region. The chapter finishes with the two core policies, which are relevant to all development proposals in the City. They relate to high quality design and the climate emergency.

Development strategy

3.2 The development strategy for the Portsmouth Local Plan seeks to implement the 2040 Imagine Portsmouth Vision. It is an ambitious development strategy in order to deliver positive outcomes for everyone with a vested interest in the City whilst addressing the twin climate and biodiversity emergencies. Although the strategy is aspirational, it recognises that the capacity for growth in the City is limited by land supply, flooding and nature conservation designations. The development strategy runs as a golden thread throughout the Local Plan.

The development strategy for Portsmouth from 2020 to 2040 is to maximise the potential of developable sites focusing on the strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design.

Key diagram

3.3 The key diagram, forming figure 3.1, shows the island geography of the City and the drivers behind the development strategy and individual policies.

3.4 In terms of development sites, it shows the location of the strategic sites allocated in the Local Plan. There are icons highlighting which of the Local Plan strategic objectives are driving the individual allocations. For example, a Thriving Economy is the policy driver at Lakeside. The key diagram also shows the area allocations for estate renewal, for example, Paulsgrove and Buckland. Our city and town centres, including Gunwharf Quays, are shown with a Thriving Economy icon.

3.5 In terms of much valued green and blue spaces, the key diagram shows Portsmouth Harbour, Langstone Harbour and the Solent along with their nature conservation designations. It also shows the main open spaces of the City such as Portsdown Hill and Southsea Common.

3.6 In terms of infrastructure, the key diagram shows the train lines, main roads, ferry links and the new sea defences.

3.7 Portsmouth does not of course exist in isolation and its immediate neighbours of Winchester City, Havant, Gosport and Fareham Boroughs are shown on the key

²¹ <https://www.push.gov.uk/>

diagram. Cross boundary working with these and other local authorities through PfSH is discussed under Duty to Cooperate.

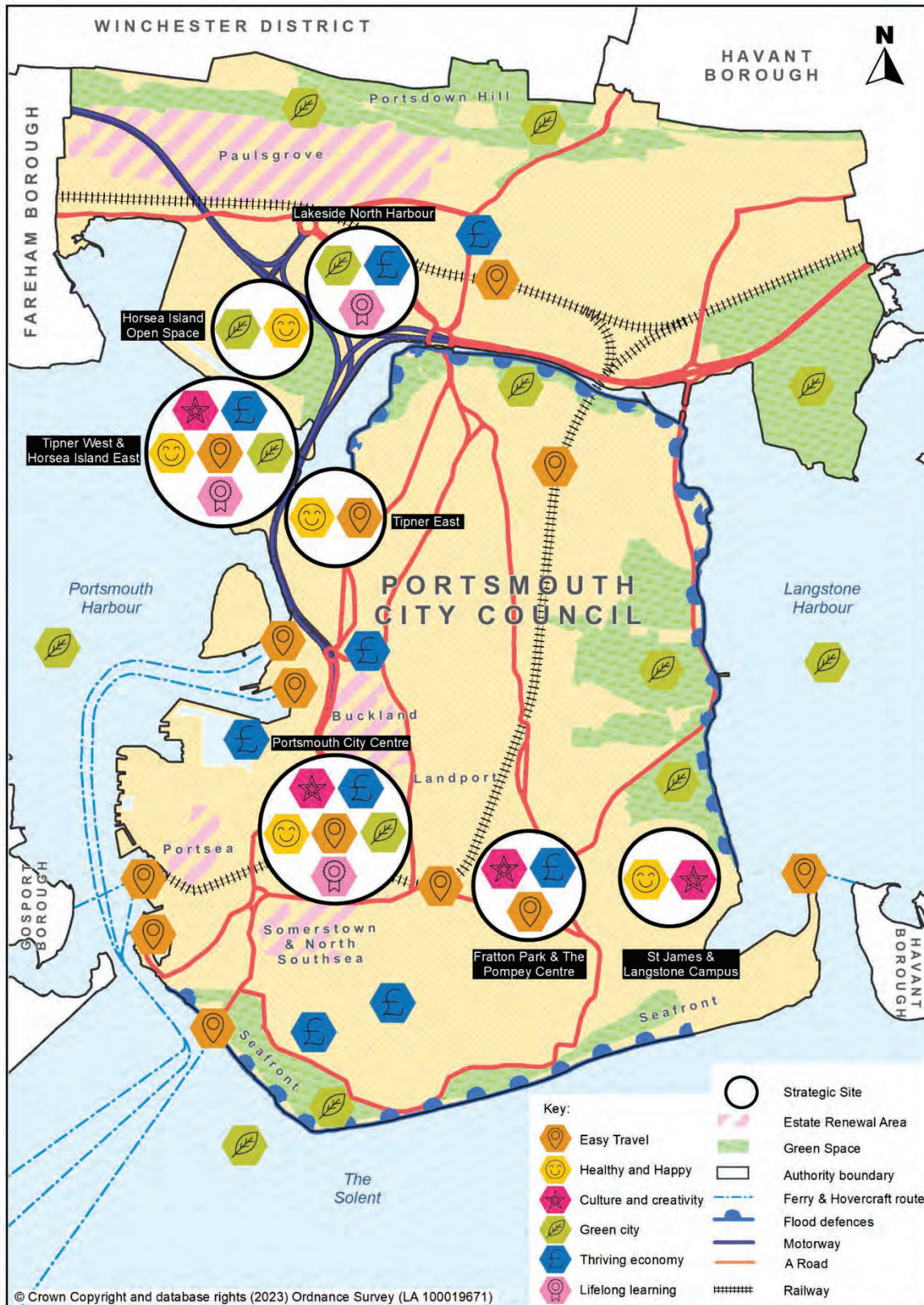


Figure 3.1: Key diagram

Development targets

3.8 The development targets for new homes and jobs in the City for this Local Plan have been prepared in line with the development strategy and are based on robust evidence in regard to the City's development needs, land supply and constraints. The headline figures are set out in table 3.1 and full details are set out in chapters 6 and 7 of the Local Plan and its supporting evidence base.

| Housing need | Housing supply | Unmet need |
|--------------------------------|--------------------------------|-------------------|
| 17,980 2020-40 | 13,603 2020-40 | 4,377 2020-40 |
| 899 per year | 680 per year | 219 per year |
| Employment need | Employment supply | Unmet need |
| 138,800 m ² 2020-40 | 138,429 m ² 2020-40 | None |

Table 3.1: Development need and supply in Portsmouth

3.9 The housing need figures set out in table 3.1 have been calculated using the standard methodology. Government policy set out in the National Planning Policy Framework (NPPF) states that the outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. The Council is ambitious for growth in the City, but recognises that this is constrained by its island geography and multiple interrelated constraints of flooding, contaminated land and nature conservation designations.

3.10 Policy PLP16 sets a housing requirement target for Portsmouth of 13,603 new homes from 2020 to 2040 or approximately 680 new homes per year. There is an unmet housing need in the City of 219 homes per year. The City Council has been in pro-active discussions with its neighbouring local authorities on this important cross-boundary strategic matter. The adopted Fareham Local Plan²² makes provision for 800 homes to help meet Portsmouth's identified need. This reduces the total unmet need in the City to 3,577 homes equating to 179 homes on an annualised basis. Discussions on helping to meet this unmet need are ongoing with our other neighbouring authorities in south east Hampshire namely Winchester City, Havant, Gosport and Fareham Boroughs and East Hampshire District Councils; full details are set out in the Duty to Cooperate Statement²³.

3.11 The City Council's Economic Development and Regeneration Strategy (2019-36) sets ambitious targets for the City including the creation of 7,000 new jobs. Despite the economic setbacks of the pandemic and Brexit in the early part of the plan period, the City Council is on track to meet these targets. The need for new employment floorspace in the City can be met by our supply of sites through both allocations and permissions.

Partnership for South Hampshire

3.12 Portsmouth City Council is an active member of PfSH, which was originally formed in 2003 as the Partnership for Urban South Hampshire (PUSH). It is a partnership of district and unitary authorities, together with Hampshire County Council and the New Forest National Park Authority, working together to support the sustainable growth of the

²² https://www.fareham.gov.uk/pdf/planning/local_plan/1.FLP2037.pdf

²³ <https://www.portsmouth.gov.uk/newlocalplanevidencedocg>

South Hampshire sub-region. The area covered by PfSH and the authorities involved is shown in figure 3.2.

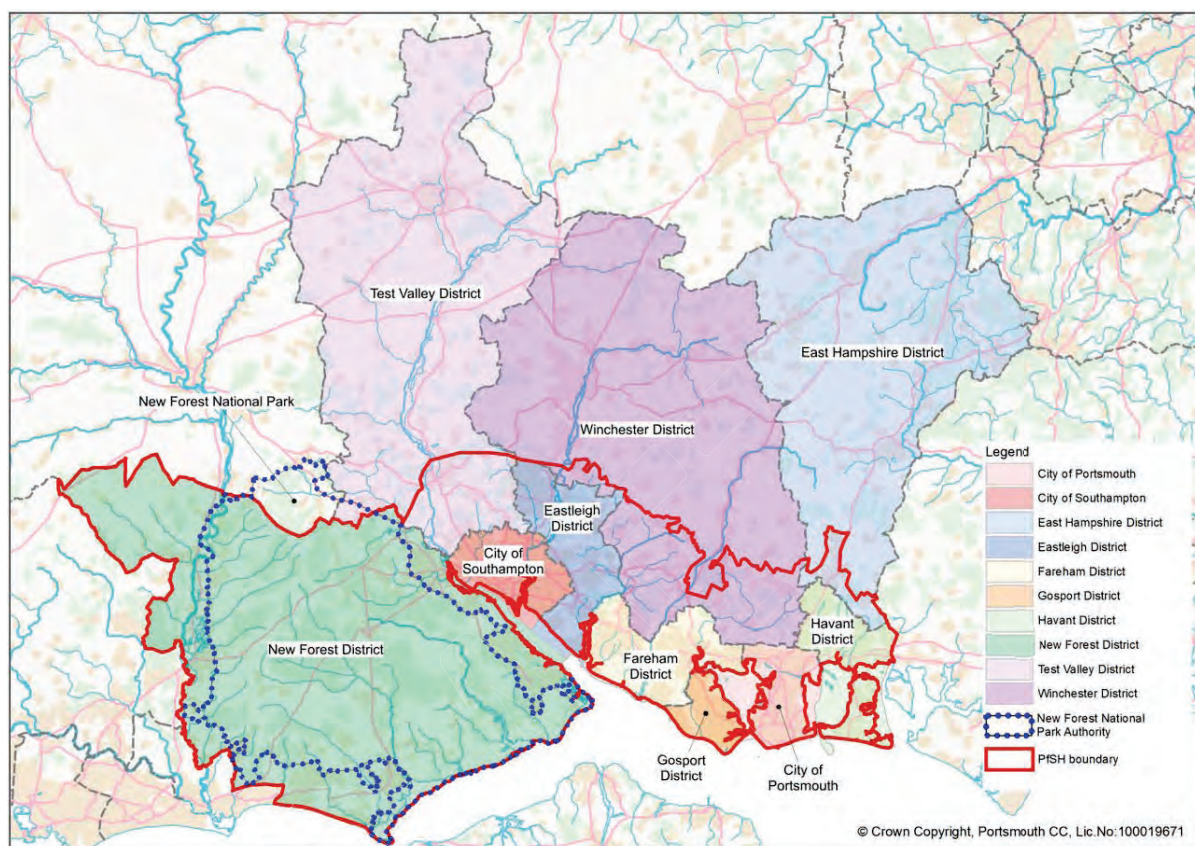


Figure 3.2: Map of the Partnership for South Hampshire sub-region

3.13 The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. The Partnership was heavily involved in the production of a sub-regional strategy for development that formed part of the South East Plan. This strategy was tested through public examination and when adopted by the Secretary of State, formed part of the development plan at that time and informed the production of local plans.

3.14 The ethos of collaborative cross boundary working continued in South Hampshire after the abolition of regional planning and the revocation for the South East Plan in 2013. As well as joint working between member authorities, PfSH works with partner agencies in the sub-region and Government departments to deliver joint strategies and pool resources. PfSH has successfully developed a number of innovative solutions to challenging issues and thus unlocked development in the sub-region whilst recognising its constraints.

3.15 A number of Statements of Common Ground have been produced by PfSH over the years. The last one was signed by Joint Committee in September 2023.²⁴ It sets out the key strategic cross-boundary planning issues including housing needs and the methodology and framework for the preparation of the new Spatial Position Statement published in December 2023. It is a snapshot of housing need and supply in the sub-region divided up between its constituent local authorities from 2022-36. The overall

²⁴ <https://www.push.gov.uk/wp-content/uploads/2023/09/ITEM9-1.pdf>

deficit was estimated to be 14,531 homes at that time with 2,481 of the deficit arising in Portsmouth. The Statement of Common Ground states that the shortfall is best defined as need that is not yet planned for, rather than need that it is definitively unmet. It states that the shortfall would diminish over time as local plan reviews get underway and emerging plans are progressed.

- 3.16 The Statement of Common Ground identifies six local planning authorities that are less likely/unlikely to meet their housing needs: New Forest District, New Forest National Park Authority, Southampton, Gosport, Portsmouth and Havant. It states that the PfSH authorities are taking a two-stage approach to addressing the needs of those authorities, including Portsmouth, that are unable to meet their housing needs in full. In the first stage, the following authorities are identified as more likely to be able to meet and potentially exceed their housing need: East Hampshire, Eastleigh, Fareham, Test Valley and Winchester. The precise contribution from each authority will be determined through their respective local plan processes.
- 3.17 In the longer term and in stage two, Broad Areas of Search for Growth identified in the Spatial Position Statement will be considered through Local Plans. These were identified by considering the combination of a relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity. The broad areas would require further investigation and technical work to determine their suitability as specific locations for development, and to test their capacity, deliverability, infrastructure and mitigation needs to achieve allocations in Local Plans. A preliminary assessment suggests that the areas of search have a combined capacity for around 7,500 dwellings, subject to deliverability, infrastructure and mitigation.
- 3.18 It should be noted that Portsmouth is not the only local planning authority in South Hampshire where growth is constrained. The sub-region is bounded by two national parks, an Area of Outstanding National Beauty, the coast/estuaries, a range of international, national and local biodiversity designations and it needs to accommodate land for biodiversity mitigation and net gain. It is already heavily built up in places, with areas of valued countryside often important in landscape terms or as settlement gaps protecting the identity of individual towns and villages. Some areas are less accessible by public transport. The Statement of Common Ground states that the need to accommodate significantly more homes for people in the medium and longer term, including in the areas of search, will need to be carefully tested through local plans against all of these important characteristics to achieve the optimum solution.
- 3.19 The PfSH Spatial Position Statement²⁵ was approved by Joint Committee in December 2023. It aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire. It should be noted that it is not an upper tier plan with which future local plans will need to conform. It does, however, help inform the preparation of and strategic co-ordination of local plans under the duty to cooperate. Table 1 of the Spatial Position Statement compares housing need and supply along with shortfalls and surpluses for each local authority in PfSH as a snapshot in time. On this basis the latest shortfall is 11,771 dwellings (2023 – 2036). Several evidence based

²⁵ <https://www.push.gov.uk/wp-content/uploads/2023/11/Item-9-Spatial-Position-Statement-1.pdf>

documents²⁶ supporting the Spatial Position Statement were published at the same time including the Broad Areas of Growth Assessments.

3.20 The Spatial Position Statement does retain the strategic principle of focusing growth on cities/urban areas first to maximise housing delivery within existing urban areas and identifies a number of existing strategic development locations in SPS7. It also identifies new Broad Areas of Search for Growth as follows:

- South-east/east of Eastleigh Town (Eastleigh)
- Havant Town Centre (Havant)
- Waterlooville Town Centre (Havant)
- Southleigh (Havant)
- East of Romsey (Test Valley)
- South-west of Chandler's Ford (Test Valley)
- East of Botley (Winchester)

3.21 . The sites that fall within the broad areas of search will need to be tested through the local plan preparation process, including against other sites that may be available or promoted within individual local planning authority areas. The local plan process will also need to resolve the quantum and form of development on sites and the infrastructure that will need to be provided to support development and make it sustainable.

3.22 Collaborative cross-boundary working has taken place for the evidence gathering, formulation of policies and monitoring of this Local Plan. Further details are set out in each chapter where relevant and in the Duty to Cooperate Statement. The following key activities have been undertaken by the City Council as part of PfSH to address strategic cross-boundary matters:

- **Housing:** Portsmouth along with Havant, Gosport and the southern parts of Winchester and East Hampshire Districts form the eastern housing market area for the sub-region. A strategic housing market assessment and an update were prepared for the whole sub-region and informed the housing policies in the Local Plan. As noted above, Fareham Borough Council has made a commitment in their Local Plan to meeting unmet housing need in Portsmouth.
- **Employment:** Portsmouth along with Havant, Gosport and the southern part of Winchester District form the eastern functional economic market area for the sub-region. An economic profile and an employment needs study were prepared for the whole sub-region and informed the employment policies in the Local Plan. The City Council also works closely with Solent Local Enterprise Partnership to determine economic priorities.
- **Greening the City:** PfSH have developed innovative solutions to issues relating to international nature conservation designations in and around the Solent. Bird Aware Solent²⁷ aims to prevent bird disturbance from recreational disturbance funded by developer contributions for new homes built within 5.6 kilometres of the coast. Whilst nutrient mitigation²⁸ for new housing development has helped to tackle nutrient neutrality in the Solent. Indeed it is the only area of the country to have done so.

²⁶ <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/#:~:text=The%202023%20Spatial%20Position%20Statement,sustainable%20development%20with%20south%20Hampshire.>

²⁷ <https://birdaware.org/solent/about-us/our-strategy/>

²⁸ <https://www.push.gov.uk/our-partnership-and-nutrient-neutrality/>

There are plans for a sub-regional country park as part of improvements to green infrastructure in the Spatial Position Statement.

- **Transport:** Solent Transport's Sub-Regional Transport Model (SRTM) was used to inform and evidence the Portsmouth Local Plan.

City Deal

3.23 The Southampton and Portsmouth City Deal²⁹ signed in 2013 is between the Government, local businesses and leaders from Southampton, Portsmouth and Hampshire councils and the Solent Local Enterprise Partnership. It aims to provide £953 million of investment into the Southampton and Portsmouth areas, creating more than 17,000 jobs. The aim is to maximise the economic strengths of Portsmouth, Southampton and the wider Solent area, by supporting further growth in the area's maritime, marine and advanced manufacturing sectors.

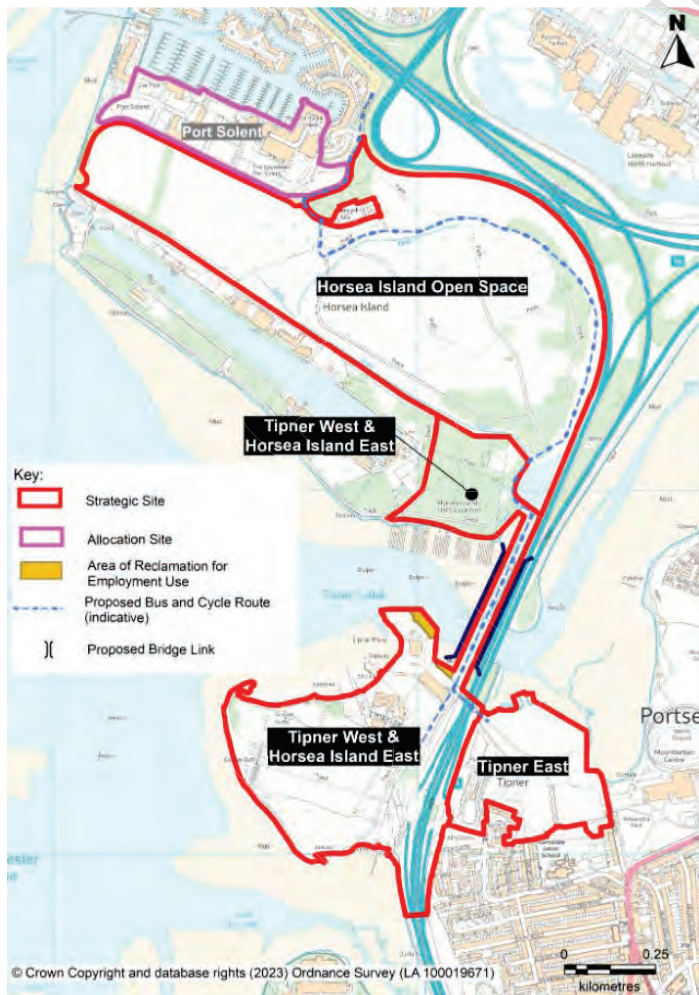


Figure 3.3: Map of the City Deal area in Portsmouth

3.24 At the heart of the Southampton and Portsmouth City Deal is an ambitious proposal to maximise the impact of marine and maritime assets by unlocking critical employment and housing sites in both cities. The critical City Deal site in Portsmouth is Tipner-Horsea

²⁹

https://assets.publishing.service.gov.uk/media/5a7c3d4be5274a1b004226bd/2013111_Southampton_and_Portsmouth_City_Deal_Document_and_Implementation_Plans.pdf

Island whilst the key site in Southampton is Watermark West Quay. The City Deal partners committed to:

- Agree a funding package for both sites utilising significant local funding sources, private sector investment (including developer contributions) and Government investment. This funding will facilitate the provision of enabling infrastructure to be undertaken – making these sites ready for private sector investment.
- Support land assembly on the Tipner-Horsea island site through the transfer of Ministry of Defence owned land, with an overage agreement, to local partners.
- Agree to expedite planning applications which relate to the relocation of Ministry of Defence related facilities.

3.25 City Deal states that unlocking Tipner-Horsea Island fully will enable the provision of 2,370 new homes and 58,000 square metres of employment space for the growing marine and advanced manufacturing sectors of the Solent economy. This will help create over 3,700 permanent jobs. The site is comprised of five pieces of land: Port Solent, Tipner West, Tipner East, Horsea Island East and the Tipner Firing Range. These are all allocated in this Local Plan and figure 3.3 is a map of the sites.

Core Policies

3.26 There are two core policies in this chapter, which provide the overarching framework for evaluating all development proposals in the City. The first core policy is on design and the development of beautiful places. The second core policy is on the climate emergency and seeks to mitigate and adapt to climate change. They are both mission critical for achieving the 2040 Vision.

Design

Introduction

3.27 Well-designed developments and environments help to create better places and to instil a sense of place and belonging for its users and residents. The 2020 report from the Building Better, Building Beautiful Commission³⁰ states that beauty 'is the benchmark that all new developments should meet. It includes everything that promotes a healthy and happy life, everything that makes a collection of buildings into a place, everything that turns anywhere into somewhere, and nowhere into home.'

3.28 The City benefits from many examples of beautiful buildings and places at a range of scales. However, there is always scope for improvement. When poorly considered, a development's design - from individual details on a building to a masterplan for a major scheme - has the capacity to erode the overall quality of an area. In this context, achieving visually attractive high-quality outcomes, including buildings and places, within Portsmouth is an ongoing priority for the Council.

3.29 Over time, Portsmouth has been characterised and shaped by its history. This has been heavily influenced by its geographical location and relationship with the sea, from its maritime beginnings through to its post-war revival as a waterfront City. This has given rise to the present character of Portsmouth, which has a mix of buildings and streets, the history of which can be traced back to the twelfth Century, through to the Victorian, wartime bombing and post-war revival up to the modern-day.

³⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBC_report.pdf

3.30 Portsmouth should continue to recognise its unique maritime heritage and characteristics, whilst looking ahead to establishing itself as a City renowned for its high quality architecture and public spaces. It can then continue to thrive as a vibrant city, which people want to live, work, and visit.

Design Vision

3.31 Based on the Imagine Portsmouth 2040 vision that this Local Plan has adopted, a Design Vision for Portsmouth has been produced. This sets out the expectation of how the City should develop going into the future.

In 2040 Portsmouth will be a thriving, vibrant City with a strong maritime history, a rich cultural heritage, and an incredible waterfront.

Portsmouth will be a City that celebrates its rich cultural and maritime heritage, with a focus on respecting and celebrating the City's historical, environmental, and coastal features. This involves appreciating the City's iconic landmarks and their settings, such as the Guildhall and the Spinnaker Tower, by preserving and enhancing important key views, as well as conserving important environmental features such as Langstone Harbour and Farlington Marshes.

Portsmouth will have a distinctive character and a strong sense of identity that will help promote the City locally, regionally, and internationally as a great waterfront and city destination. The character of Portsmouth will be enriched by high-quality architecture and place-making through a mix of traditional and contemporary buildings, public spaces and streetscapes, that showcase the City's creative energy and celebrate its cultural heritage.

Portsmouth will deliver a variety of residential, commercial, educational and recreational opportunities to meet the needs, health, and wellbeing of its population. Portsmouth will be a city that supports local businesses and entrepreneurs. It will be a city that attracts and enables investment from a range of industries, creating significant employment opportunities and a thriving economy.

Portsmouth will have a high quality joined-up network of green parks, open spaces and trees, with a variety of welcoming and inviting parks and open spaces that provide opportunities for residents to live active and healthy lives.

Portsmouth will be a city that is accessible and easy to navigate, with a focus on providing sustainable transport modes that offer a realistic alternative to the private car. Portsmouth will have an excellent network of inclusive, safe cycling and walking routes, whilst a variety of public transport options will make it easy to travel around the City and beyond.

Portsmouth will be a net zero-carbon city that is proactive and committed in protecting and enhancing the environment for future generations. Sustainability, climate resilience and low carbon will be at the heart of the City's buildings, transport, and infrastructure, ensuring meaningful measures are in place to address the impacts of climate change.

National policy and guidance on design

3.32 The National Planning Policy Framework (NPPF) states that achieving high quality places and buildings is fundamental to the planning process. The NPPF requires that

Local Plans set out a clear design vision and expectations, reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. The National Design Guide³¹ and National Model Design Code³², which support the NPPF, provide more detailed guidance on the key characteristics of what constitutes well-designed development and the components of a quality place; these are illustrated in figure 3.4.



Figure 3.4: The ten characteristics of well-designed places

3.33 In the context of Portsmouth, developers and agents should consider how development proposals can positively contribute towards Portsmouth's design vision through the lens of the ten characteristics.

3.34 Well-designed places and buildings are achieved when a development project is grounded upon the design process from its earliest stage, whilst recognising that the design process is iterative in order to optimise the design of proposals.

3.35 Design concepts should have a clearly expressed 'story', which may draw its inspiration from the site, its surroundings, or wider context. Equally, if appropriate, the concept may introduce new approaches to complement or contrast with its context.

3.36 Figure 3.5 illustrates the preferred design process for development in Portsmouth. The design process should be approached as an iterative one, which seeks to come to an optimal design outcome for a particular site. In order to work out the optimal design

³¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

³² <https://www.gov.uk/government/publications/national-model-design-code>

proposal for a site, the design process for a scheme should be developed from an understanding of the site and its context, including identification of opportunities and constraints. From following through with this early stage in sufficient detail, a design vision can be formulated that will encapsulate the overall development outcomes for the site, which then can be translated into design parameters. After this, it may be necessary to test conceptual plans with the City Council, local community/stakeholders, and/or a design review panel. Using this feedback, the next stage will be to finalise the design parameters, principles, and justification, and reflect these into the final proposed plans for submission. However, since the design process is iterative, the process may still necessitate revisiting previous stages in order to fully investigate design issues and options, which may be in response to feedback received from committee/stakeholder engagement and/or in the course of the pre-application or planning application stages.

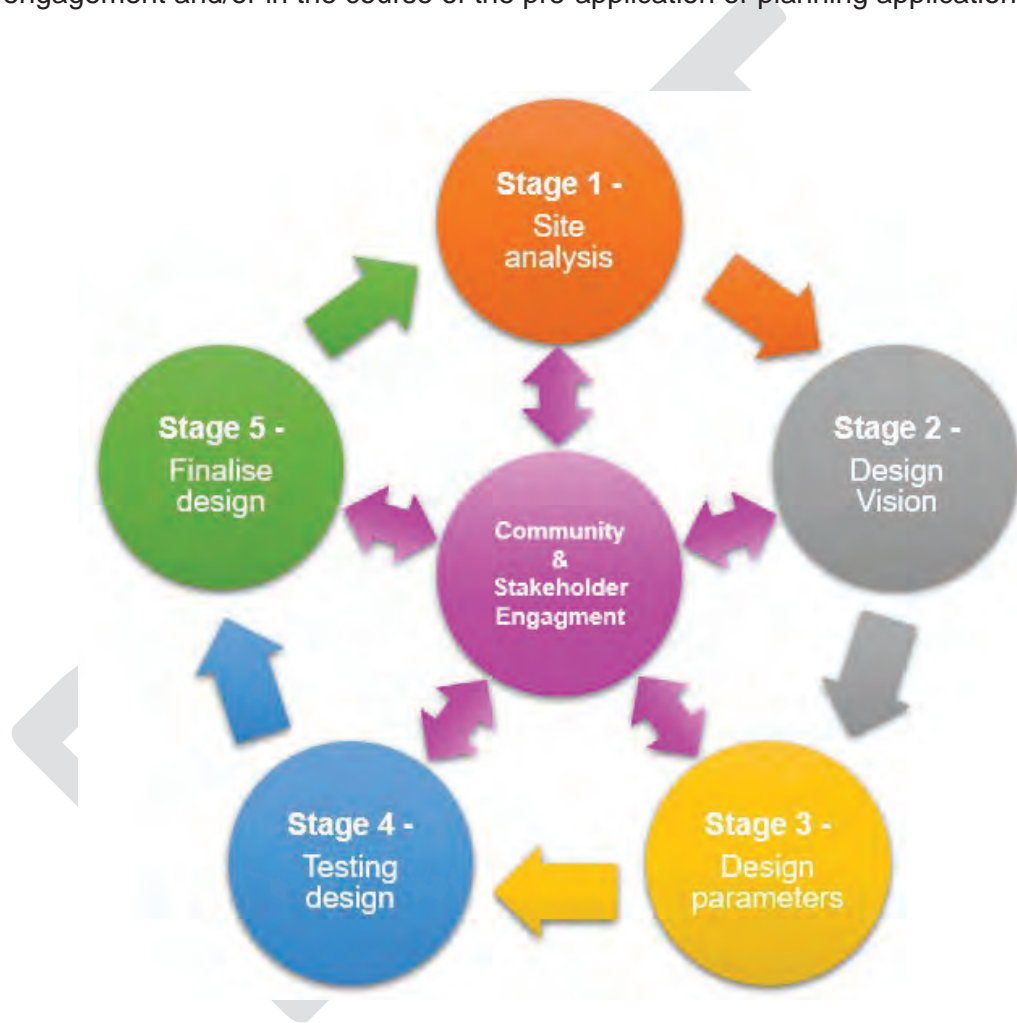


Figure 3.5: Design process for Portsmouth

3.37 Developers and their agents are strongly advised to engage with the community and key stakeholders throughout the process (and as early as possible) to seek for their input into design concepts and proposals, using approaches such as co-design, workshops. Effective and meaningful community engagement is a way to gather information, feedback, and to co-create and develop ideas and concepts. This is especially true for major development proposals as they have a greater magnitude of impact and change upon the communities and built environment within a particular area. With these points in mind, proposals for major development will be expected to fully document the project's design process and engagement through a Design and Access Statement or similar.

Core Policy PLP1: Design 

The Council will ensure that a high standard and quality of design and place-making that support beauty is achieved in the City. This will be realised by assessing development proposals against the following criteria:

1. Development proposals will be supported provided that they make a positive contribution towards achieving the Portsmouth Design Vision.
2. Development proposals will be permitted where the following key design and place-making characteristics and components have been demonstrated:
 - a) **Context:** understanding and relating positively to the site and its local and wider context, including the:
 - i. Rhythm of existing and surrounding buildings' building height, alignment and roof line/pitch;
 - ii. Townscape, streetscape, views, and vistas;
 - iii. Existing buildings or townscapes of heritage value; and
 - iv. Existing natural environment and open space.
 - b) **Identity** - responding positively to existing local character and identity through creating memorable, distinctive and attractive buildings and places through the use of:
 - i. Architectural style, detailing and ornamentation;
 - ii. Material quality, sustainability, durability, colour, finish/texture, and detail; and
 - iii. Fenestration.
 - c) **Built form** - creating appropriate forms and types of development, including outstanding or innovative architectural solutions, through the consideration of the following aspects:
 - i. Access;
 - ii. Appearance;
 - iii. Height;
 - iv. Massing;
 - v. Scale;
 - vi. Form;
 - vii. Landscaping;
 - viii. Layout and orientation;
 - ix. Siting and alignment;
 - x. Setting;
 - xi. Density; and
 - xii. Floorplan.
 - d) **Movement:** integrating a network of routes for all modes of transport, using a clear structure and hierarchy of connected streets with well-considered access arrangements, parking, servicing, and utilities infrastructure.
 - e) **Nature:** creating high quality green open spaces and/or public spaces and/or streets, with a variety of landscapes and activities, including play and recreation.

- f) **Public spaces:** creating well-located, high quality and attractive public spaces that are clearly defined, durable, accessible, and safe, along with the following considerations:
 - i. Including public art where appropriate, giving due consideration to prominent and sensitive locations; and
 - ii. Providing well-designed spaces that support social inclusion, health, and wellbeing.
 - g) **Uses:** providing or connecting with a mix of uses that provide for day to day needs of users and/or occupiers.
 - h) **Homes:** providing an appropriate mix and variety of home sizes and tenures that have sufficient internal and external space, and that also have appropriate and adequate provision for parking, storage, waste, servicing, and utilities.
 - i) **Resources:** creating development that reduces resource requirements; is adaptable; and uses materials, measures and technologies to minimise its environmental impact and maximise resilience to climate change.
 - j) **Lifespan:** designing safe, robust, long-lasting, well-managed and maintained development, which is accessible and adaptable to users' changing needs and evolving technologies, and which fosters a sense of ownership and belonging for its users and communities.
3. **Development proposals for large-scale major development and/or development of sites within a sensitive location will be permitted where they have positive regard to any design code or design guide relevant to the site. Where a developer/applicant is required to produce a design code for a site, this should be based on effective community/stakeholder engagement, reflect local aspirations for the development of the site, address the National Design Guide and the National Model Design Code, and have due regard to the Council's Urban Characterisation Study³³.**
4. **Development proposals will be supported provided that they help to overcome crime and disorder, and the fear of crime, through its design, layout, and other deterrent features.**
5. **Development proposals will be refused where they give rise to unacceptable adverse impacts in relation to the amenity of neighbouring occupiers as well as future occupiers/users of the development.**
6. **Development proposals will be permitted where it can be demonstrated that development will avoid, minimise, or where necessary mitigate, adverse direct or cumulative impacts in relation to the following factors:**
- i. Outlook / aspect;
 - ii. Sense of enclosure;
 - iii. Direct or perceived overlooking / privacy;
 - iv. Daylight / sunlight;
 - v. Noise;
 - vi. Odour;
 - vii. Glare; and

³³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-urban-characterisation-study.pdf>

viii. Micro-climatic effects.

7. Development proposals for a tall building(s) will be assessed against the following criteria:

- a) **Development proposals for a tall building(s) will be supported provided it is located within the following preferred areas as identified on the Policies Map:**
- **The Hard**
 - **City Centre/Dockyard/Portsmouth International Port**
 - **Kingston Crescent/Estella Road**
 - **Fratton**
 - **Tipner**
 - **Port Solent**
 - **Cosham**

Outside of the above preferred areas, there is a presumption against permitting a tall building(s) unless the particular merits of a proposal outweigh this general presumption.

- b) **Where proposals for a tall building(s) fall within 500 metres of an SPA, SSSI, SAC and/or Ramsar sites, and supporting functionally linked habitats appropriate mitigation measures, shall be secured, in consultation with Natural England, to ensure there is no adverse effect on ecological integrity.**
- c) **Development proposals for a tall building(s) should have regard to the Tall Buildings Supplementary Planning Document³⁴ or future equivalent.**

Supporting text

3.38 The purpose of this policy is to deliver on the council's priority for high quality design and place-making of development within Portsmouth.

3.39 It is expected that applicants/developers use the ten characteristics of a well-designed place as a lens through which the design of a proposal is formulated, and justification can be made to demonstrate that it makes a positive contribution to achieving the Portsmouth design vision.

3.40 The design process of a proposal, especially major developments, should be well-followed and well-documented. Where required, comprehensive Design and Access Statements (or similar, as appropriate) will be expected as part of a pre-application or planning application submission³⁵, and the design rationale/justification for the proposal must be provided to aid in the assessment process.

3.41 Large-scale major developments should be supported by detailed masterplans, or development frameworks and, where appropriate, design guides or codes. Such tools and documents are expected to be produced in collaboration and consultation with the community and stakeholders. The Urban Characterisation Study provides a baseline analysis of the existing character of the City. Therefore, design guides or codes should

³⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-buildings-tall-buildings-spd.pdf>

³⁵ The guidance on the type of applications that require a Design and Access Statement should be followed, as per PPG Paragraph: 030 Reference ID: 14-030-20140306 (or future equivalent) <https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement>

utilise the Urban Characterisation Study to inform the earlier stages of the design code process as prescribed by the National Model Design Code.

- 3.42 Householder and minor developments are expected to deliver high quality design, although it is considered that the evidence and justification included as part of any application is proportionate to the scale and nature of the proposal.
- 3.43 Changes to approved development schemes at the post-permission stage also have the potential to erode design quality. In light of this, the Council will seek to ensure that the quality of approved development is not materially diminished between planning permission and building completion stage through the use of planning conditions or other agreements.
- 3.44 Design proposals must consider that every person has the right to feel and be safe in the places and environments that they live, work, and visit. Furthermore, poorly designed developments have the potential to cause issues that result in the loss of amenity for neighbouring occupiers and users. Therefore, good design practices and processes (including measures to support the strategy for tackling violence against women & girls) are expected to be utilised to overcome any potential for safety and/or amenity issues.
- 3.45 Tall buildings³⁶ can impact positively and negatively on the character and appearance of an area. If they are well designed and located appropriately within an area, they can create a sense of excitement, indicate success and wealth, and become something to be proud of. If they are poorly designed, however, they can detract from the character of an area and become a burden both for the local population and local authority.
- 3.46 Portsea Island is mainly flat and does not rise above sea level by more than a few metres at any point. As a result, the City's buildings are the dominant feature of the city skyline and make a significant contribution to the character of Portsmouth and the wider area. This means it is especially important to make the correct decisions on the location of tall buildings in the city and insist on the highest standards of architectural quality.
- 3.47 Historically in Portsmouth, tall buildings have been dealt with on an ad-hoc basis which has not always produced the best results. Therefore, it is important to have a coherent strategy setting out appropriate locations and design criteria for tall buildings.
- 3.48 The council has identified eight areas of opportunity where tall buildings are considered acceptable in principle. These areas are regarded as suitable for a variety of reasons including:
- Proximity and ease of access to public transport;
 - Proximity to local commercial/shopping centres;
 - The presence of existing tall buildings within the area; and
 - The suitability of their character and other townscape and ecological factors.
- 3.49 The design of tall buildings, for example building height and lighting schemes, should be such that there are no adverse effects on sight lines and flight lines of birds in European sites or functionally linked habitats. Building design should also ensure that the risk of bird collisions is minimised. Where tall buildings fall within 500m of an SPA, SSSI, SAC and/or Ramsar sites, and supporting functionally linked habitats, appropriate mitigation measures shall be secured, in consultation with Natural England in line with

³⁶ A tall building is considered to be: any building above five storeys in height i.e. six storeys or more in height and/or any building of 20m or above in height.

guidance set out in the Habitat Regulations Assessment (paras 6.8.1 / 6.8.2) supporting the Local Plan.

- 3.50 A project-level Habitats Regulations Assessments (HRA) of development proposals will be undertaken at the planning application stage. It is advised that applicants discuss these issues with Portsmouth City Council's ecologist and Natural England at an early stage.

Climate Emergency

Introduction

- 3.51 There is a climate emergency because our climate is changing faster than nature, or we, can adapt to it. We have a limited time to keep global temperatures within a limit that the Earth can recover from, so we have to take action now.
- 3.52 The Climate Change Act 2008 legislates climate action in the UK with targets to reduce its emissions. The Act was amended in 2019 to legislate for net zero carbon emissions by 2050. It is important to note that net zero carbon targets are interim targets before a net negative is achieved, where removals of carbon are greater than that emitted. Net negative is required to reduce the elevated concentrations of greenhouse gases in the atmosphere causing climatic changes. The Climate Change Strategy will be adapted in the future to determine new net negative targets
- 3.53 Portsmouth City Council declared a climate change emergency in March 2019. The Council considers that that we are in the middle of global changes to our climate that pose threats to our health, our planet and our children's and grandchildren's future. It considers that there is no time to waste if we are to avoid the consequences of a rise in global warming. As a low lying island city, Portsmouth is especially vulnerable to the impacts of climate change, with most of it identified as being at risk of flooding by the Environment Agency. The City Council sets out in its Climate Emergency Strategy³⁷ how it will respond to this emergency and outlines its first steps in this urgent race against time.
- 3.54 The Climate Emergency Strategy sets out specific interventions for all housing in the City in order to ensure, Portsmouth residents have good quality homes. Efforts to support the transition to a low carbon future and be "future-fit" for changing climates needs to be enhanced for both existing homes, buildings, and other infrastructure but also in new development projects. When we think about being "future-fit", we need to consider the lifetime of that structure and how well suited it is for the future, both in terms of carbon emissions and climate change. This means taking transformative actions to modify existing structures and thinking about how to create new ones. The benefits of applying climate change thinking in this area are substantial, from reducing the use of higher carbon energy sources, reducing energy and fuel poverty, and improving indoor and outdoor air quality.
- 3.55 The Climate Emergency Strategy sets out a number of area specific mitigation measures to support and encourage carbon emission reductions:

³⁷

<https://democracy.portsmouth.gov.uk/documents/s25687/Response%20to%20Climate%20Emergency%20Strategy%20appendix%20A.pdf>

- Promoting increased domestic and commercial energy efficiency and usage reduction.
- Promoting decarbonisation of our utility services.
- Promoting lower carbon fuel and onsite renewable energy sources.
- Enhanced PCC planning requirements for low carbon and carbon neutral development for new developments and existing build enhancements, that also support low carbon travel and transport.
- Promoting measures to reduce water usage and water waste.
- Promoting measures to increase re-use or recycling of building materials and reduce waste

3.56 In December 2023 the Government issued a Written Ministerial Statement³⁸ preventing local energy efficiency standards for buildings that go beyond current or planned buildings regulation. This has prevented the City Council from including ambitious targets for energy efficiency in this Local Plan in line with its Climate Change Strategy. The Council is disappointed by this decision and encourages the Government to bring in the necessary changes to the energy efficiency building regulations at the earliest possible opportunity.

3.57 The Climate Emergency Strategy sets out a number of adaptation measures to increase resilience:

- Understanding the climate change risks and any opportunities to our homes, buildings, and infrastructure.
- Building resilience into our homes, buildings, and infrastructure.
- Enhanced planning requirements to demonstrate climate change resilience.
- Community resilience and planning.
- Improving the provision of advice to building users around heat waves and increasing temperatures.

3.58 Strategic City-wide policies on flooding, sustainable drainage systems, sustainable construction, renewable energy, the coastal zone, air quality and pollution and contaminated land are set out in the Climate Emergency chapter of the Local Plan. It is also addressed as necessary in the Strategic Site allocations.

Core Policy PLP2: Climate Emergency

1. Development proposals will be supported provided that they:

- Reduce greenhouse gas emissions and store carbon;**
- Minimise energy use and demonstrate that residual energy demand can be met with renewable forms of energy;**
- Maximise the generation of energy from renewable and low carbon sources of energy;**
- Are designed to adapt and be resilient to the impacts of local climate change;**

³⁸ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123#:~:text=Statement%20made%20on%2013%20December%202023&text=As%20a%20Government%2C%20we%20continue,the%20homes%20and%20building%20sector.>

- e) **Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change;**
- f) **Maximise water re-use and the protection of water resources;**
- g) **Prioritise active travel and effective public transport over car use wherever possible;**
- h) **Deliver green infrastructure and enhance biodiversity;**
- i) **Prevent and minimise waste and encourage re-use, recycling, and resource recovery; and**
- j) **Encourage the reuse of existing buildings and structures.**

2. Development proposals for major development must be supported by a Sustainability Statement, which clearly demonstrates how it meets the objectives set out in Part 1 of this policy.

Supporting Text

3.59 The purpose of this policy is to ensure that new development meets the objectives set out by the City Council's Climate Change Declaration and Climate Change Strategy.

3.60 Direct greenhouse gas emissions from buildings accounted for 17% of UK greenhouse house gas emissions. These emissions are mainly the result of burning fossil fuels for heating. Emissions from electricity use, known as indirect emissions, are caused primarily by the use of lighting and appliances. Development should minimise the amount of Green House Gases that it emits during construction and across its lifetime. The BREEAM standards³⁹ provide guidance for the development industry on how this can be achieved through BREEAM home and Technical Standards. It is important that development takes a Whole Life Standard approach to reduction of emissions.

3.61 Development should look to take a fabric efficiency first approach to ensure that buildings minimise energy use. Only when this approach has been applied should development look to meet any remaining residual energy demand from renewable energy sources.

3.62 The most common types of renewable energy anticipated to be provided as part of new development in Portsmouth are solar energy and wind energy. There may also be specific circumstances where tidal energy is appropriate. Although biomass energy is a renewable energy source, due to the production of localised emissions other forms of renewable energy should be prioritised where possible. In addition, ground and air source heat pumps may be appropriate for smaller scale development.

³⁹ https://bregroup.com/products/breeam/breeam-solutions/breeam-net-zero-carbon/?infinity=ict2~net~gaw~cmp~17562588451~ag~148561404696~ar~655459529267~kw~reducing%20carbon%20footprint%20in%20construction~mt~b~acr~3626112201&gclid=EAlalQobChMIkuKc0qvF_wIVl-3tCh0jgQmlEAAAYASAAEgl22fD_BwE

3.63 Development in the City needs to take account of the risks associated with climate change, in order to reduce negative impacts and build resilience. The largest risks to the City from climate change are flood risk from rising sea levels and overheating, exacerbated by climate change and the urban heat island effect.

3.64 Overheating is a major risk to the City caused by climate change related extreme heatwave events. The densely developed, urban nature of much of Portsmouth means that it is already susceptible to a phenomenon known as the Urban Heat Island. This is the process by which the manmade surfaces of urban areas that tend like tarmac, concrete and stone, absorb and store heat all day, then reradiate it at night. The result is that temperatures in the City tend to be higher than surrounding rural areas. Whilst the Urban Heat Island effect can occur independently of climate change, the increasing temperatures projected to occur with climate change serve to compound and exaggerate the problem making urban areas like Portsmouth particularly at risk from this climate impact. The Adapting to Climate Change Background Paper provides detail on the risk and potential management approach.⁴⁰

3.65 The other major risk from climate change for Portsmouth, is increased risk of flooding from the sea. The coastal nature of the City, coupled with the low-lying nature of Portsea Island means that Portsmouth is subject to an existing high level of flood risk. A significant proportion of the city falls within the Environment Agency flood zones 2 or 3, areas that are at medium or high risk of flooding and these areas of elevated flood risk will expand into the future due to sea level rise. Much of the city is protected or proposed to be protected by the North Portsea⁴¹ and Southsea Coastal Schemes. The North Portsea scheme is designed to protect against a 1 in 500 year flood event and take account of the climate change to 2100, whilst the Southsea⁴² scheme is protected to a 1 in 200 year standard. The future requirements for flood defence and resilience in the city are set out in Policy PLP25. The position as set out in that policy has been informed by and SFRA level 1 carried out jointly with the authorities in the Partnership for South Hampshire and further detailed SFRA level 2 specific to Portsmouth.

3.66 Development proposals will need to take opportunities to maximise water efficiency and use of water resources. This could include the use of water efficiency measures such as tap aerators, water saving appliances and metering. Rainwater harvesting also has significant water saving potential including water butts for householders and larger storage tanks as part of larger schemes. Grey water recycling also has the potential to provide significant water savings.

3.67 Development that impacts the Source Protection Zone on Portsdown Hill⁴³, should be designed to ensure that no pollutants from the development are able to percolate into the aquifer. Further detail on Source Protection Zones can be found on the Governments website⁴⁴.

⁴⁰ [https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Adapting to Climate Change through the Local Plan April 2021 compressed.pdf](https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Adapting_to_Climate_Change_through_the_Local_Plan_April_2021_compressed.pdf)

⁴¹ <https://coastalpartners.org.uk/project/protecting-the-future-of-north-portsea-island/>

⁴² <https://southseacoastalscheme.org.uk/>

⁴³ <https://magic.defra.gov.uk/MagicMap.aspx>

⁴⁴ <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

- 3.68 To encourage the uptake and continued use of sustainable modes of transport in order to tackle climate change, the location, design and layout of development will need to show priority being given to pedestrian, cycle movements and access to sustainable transport modes. There is the potential to further increase the uptake in sustainable transportation methods by improving and upgrading or providing railway, bus, cycle and other infrastructure. Improvements can make public and sustainable transport a more attractive option, Policy PLP47 of the Local Plan, Movement and Transport sets out the transport requirements for the Local Plan.
- 3.69 Green Infrastructure plays an important role in, mitigating and adapting to climate change, enabling, and supporting healthy lifestyles through outdoor recreation and access and enhancing biodiversity. The Council will expect development to contribute to urban greening as set out in Policy PLP38 Green Infrastructure. Green infrastructure should always be provided onsite in the first instance unless it can be proved that this is not feasible to do so. Development proposals which could adversely impact upon existing green infrastructure assets will only be granted permission where suitable mitigation is satisfactorily agreed and secured. This is to ensure that the local green infrastructure network is continually safeguarded and does not become fragmented.
- 3.70 Sustainable design and construction should strive to make the most efficient use of natural resources and their transportation. Opportunities should be maximised to reuse or recycle materials within the construction process, including the reuse of old buildings where appropriate. Waste products should be reduced, re-used or recycled as much as possible. These practices will also help to reduce embodied carbon within the construction process. Proposals will need to take account of the current and emerging Hampshire Minerals and Waste Plans⁴⁵ prepared by the Hampshire Authorities including the City Council.
- 3.71 The reuse of existing buildings and structures is a key consideration when addressing embodied carbon in construction. The reason that existing buildings are usually more sustainable than new buildings is that the quantity of carbon emissions during construction of a new building is large in comparison to the annual operating emissions of the building, especially as operations become more energy efficient and energy supplies transition to renewable generation. Wherever practicable development should look to reuse the existing structures as part of the redevelopment of brownfield sites. Embodied carbon calculators provide a way in which development can calculate the carbon saving of reuse vs new build.
- 3.72 Development proposals for major development must be supported by a Sustainability Statement either as a standalone document or as part of a Design and Access Statement, Details on what is required for a Sustainability Statement is found in the supporting text to Policy PLP33 in the climate change chapter of the Local Plan.

⁴⁵ <https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan->

Chapter 4: Strategic Sites

Introduction

- 4.1 A number of strategic sites are allocated in this chapter. The quantum of development are set out in table 4.1 and a map showing their locations forms figure 4.1. All of the sites are mission critical for achieving the Imagine Portsmouth 2040 Vision in different ways. This is illustrated with the use of icons to show which of the strategic objectives of the Local Plan will be achieved on the site, and an individual vision is set out for each strategic site. The policies in this chapter are strategic and any policies relating to these sites in neighbourhood plans should align with them.
- 4.2 The majority of the sites are allocated for mixed use redevelopment, but some are allocated for a single land use. All of the allocations are supported by robust evidence most notably the Housing and Economic Land Availability Assessment (HELAA)⁴⁶, which is the Council's main evidence based study on land supply. References to more detailed individual studies are cited in the text. It should be noted that all the development requirements set out in these policies are site specific and requirements set by City-wide policies such as affordable housing are not repeated here. The quantum of development set in these policies are indicative yields only and may be subject to further change through the development management process. The local planning authority will therefore take a flexible approach to the actual quantum of development subject to robust evidence being provided to justify them in forthcoming planning applications.
- 4.3 Flooding is a significant issue in Portsmouth and therefore, the Strategic Flood Risk Assessment (SFRA) Level 2⁴⁷ was produced to assess flood risk at strategic and allocated sites. Following the assessment, the recommendations contained within have been used to inform both site specific policies and the City-wide policies PLP31 (Flooding) and PLP32 (Sustainable Drainage Systems). It should be noted that all strategic and allocated sites will need to be supported by a robust, site specific flood risk assessment and a sequential approach to land use planning must be applied to each site. The SFRA Level 2 also provides information relating to current and future flood defence projects within Portsmouth. Further details relating to these schemes and their delivery across Portsmouth can be found in the Infrastructure Delivery Plan⁴⁸.
- 4.4 A monitoring and delivery framework is set out at the end of the supporting text for each strategic site. This shows the types and amounts of development associated with the Strategic Site and the anticipated rate of development. Information is also provided on delivery mechanisms and triggers where relevant. Chapter 12 (Monitoring) includes targets and indicators for all the strategic sites, which will be reported on annually in the Authority Monitoring Report. These reflect the monitoring and delivery frameworks within this chapter.

⁴⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/02-PCC_Housing-and-Employment-Land-Availability-Assessment_2023-Report_FINAL-latest-version-for-CDL.pdf

⁴⁷ <https://www.portsmouth.gov.uk/newlocalplanevidencedocs>

⁴⁸ <https://www.portsmouth.gov.uk/newlocalplanevidencedocg>

| Site | Homes | Commercial floorspace (net) | Other benefits |
|----------------------------------|----------|--|---|
| Tipner West & Horsea Island East | 814-1250 | 58,000 m ² marine hub | <ul style="list-style-type: none"> • Flood defences • Land decontamination • New bridge |
| Tipner East | 1,056 | 716 m ² commercial floorspace (Classes E, F1 and F2) 840 m ² ancillary commercial uses at the transport hub | <ul style="list-style-type: none"> • Transport hub with 2,650 car parking spaces • Flood defences • Land decontamination |
| Lakeside North Harbour | - | 50,000 m ² | <ul style="list-style-type: none"> • 20% BNG |
| Portsmouth City Centre | 4,158 | 1,546m ² (20,000m ² gross) | <ul style="list-style-type: none"> • 2.9ha park • 20% BNG at City Centre North • Enhanced Culture and Leisure offer |
| Fratton Park & the Pompey Centre | 710 | Expanded stadium Hotel Mixed conference and event facilities | <ul style="list-style-type: none"> • Off road link from the station to the Pompey Centre and Fratton Park |
| St James' & Langstone Campus | 417 | - | <ul style="list-style-type: none"> • Retention of public access and parkland setting |
| Horsea Island Open Space | - | - | <ul style="list-style-type: none"> • 64 ha of open space • Bus Way linking Tipner to Port Solent. |

Table 4.1: Strategic site delivery

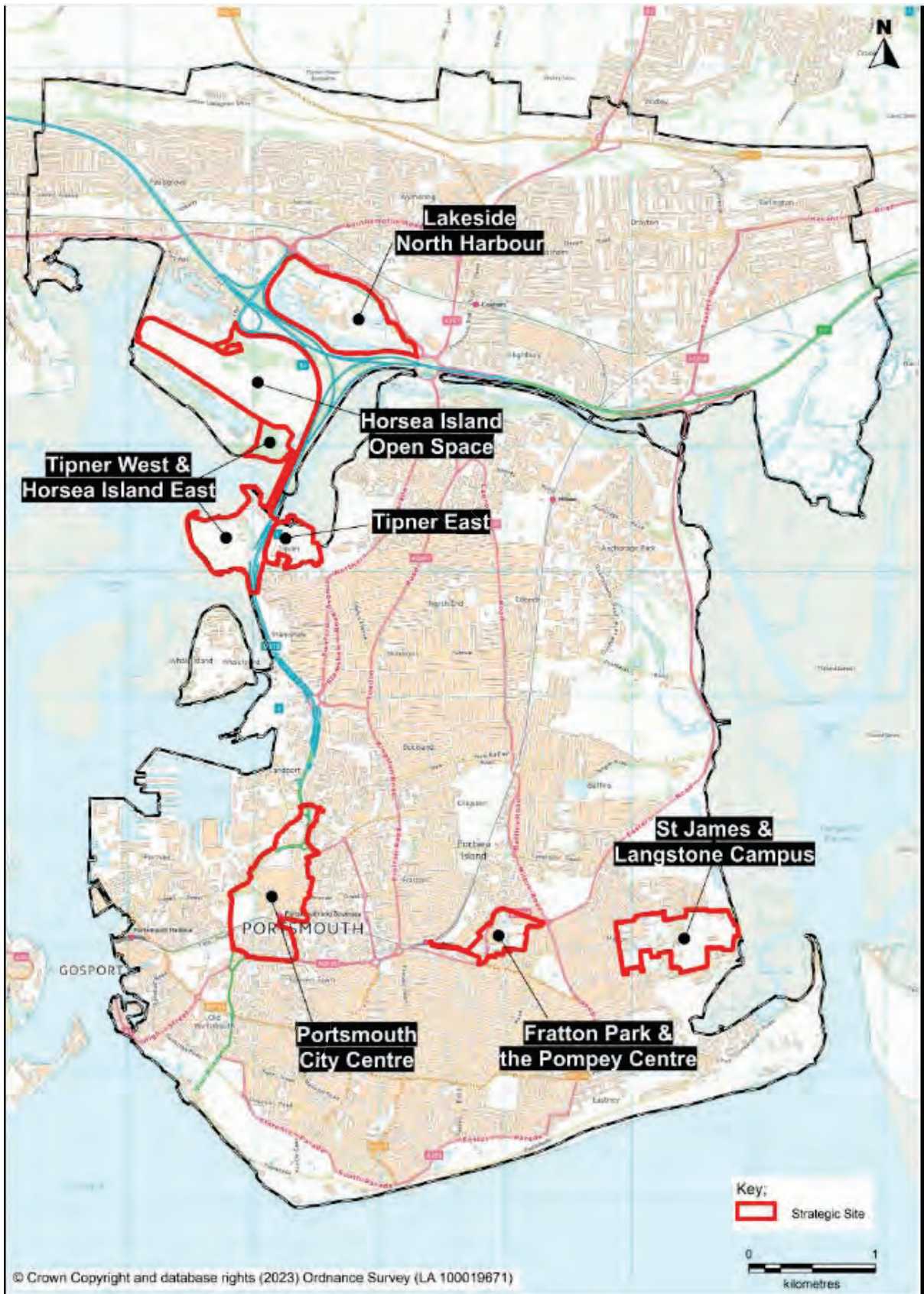


Figure 4.1: Strategic site allocations

Tipner West & Horsea Island East

Introduction

4.5 Tipner West & Horsea Island East is allocated as a strategic site, because its development as a new marine hub with a new bridge to the mainland is key to the regeneration of Portsmouth. Furthermore the new sea defences and land decontamination will benefit the northern part of Portsea Island. It is located immediately adjacent to the M275 motorway at the northwest part of Portsea Island and is bounded on three sides by Tipner Lake, which is part of Portsmouth Harbour. The site is allocated alongside the allocation for Tipner East (which forms Policy PLP4), and together they will form a new gateway to the City. A large area of open space is being created to the north of the site on Horsea Island, which will be available for the new residents and visitors to enjoy; this is allocated under Policy PLP9. As discussed in the Development Strategy chapter of this Local Plan, the wider Tipner-Horsea Island area, including Port Solent, is one of the two principal sites identified in the Southampton and Portsmouth City Deal. A map of Tipner West & Horsea Island East with the proposed bridge linking the two parts of the site is shown as figure 4.2.

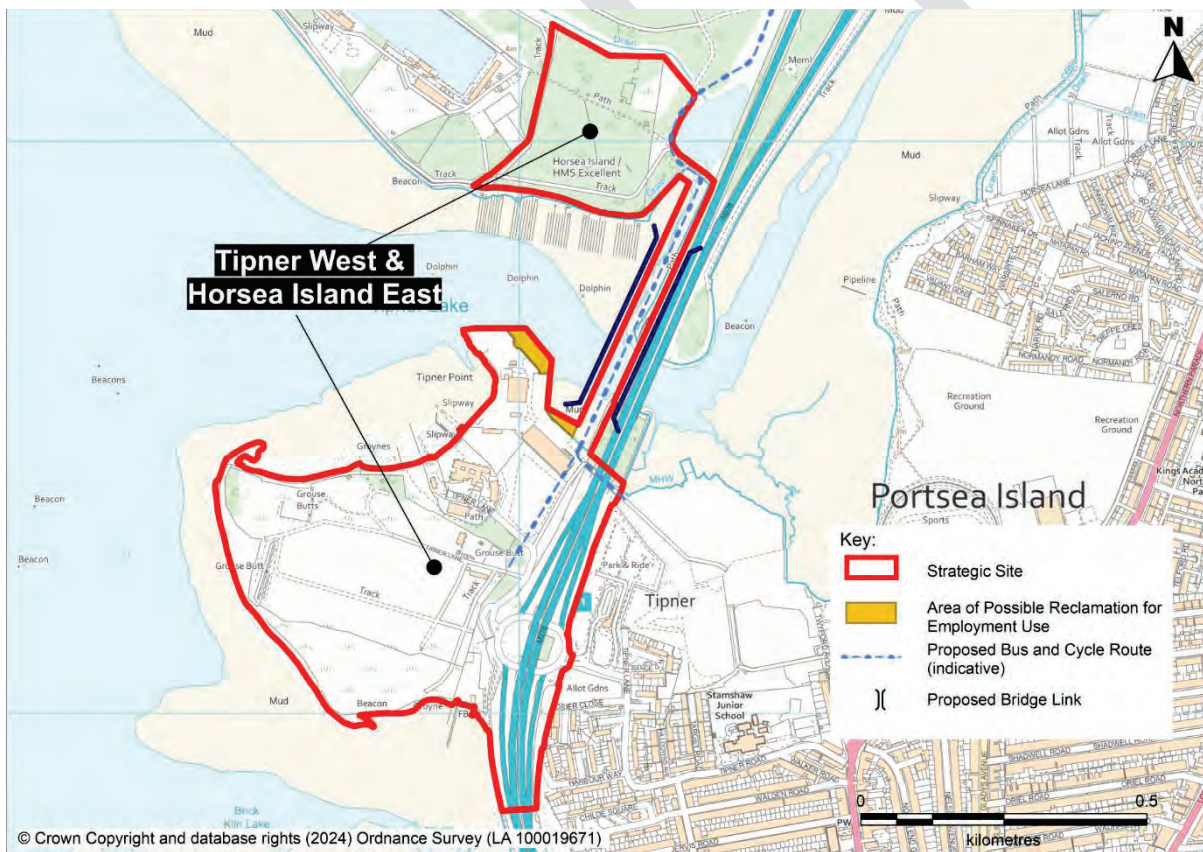


Figure 4.2: Map of Tipner West & Horsea Island East

4.6 There is deep water access at Tipner West and the principal driver behind this allocation is the creation of a new marine hub, which will create new jobs in this key sector of the City's economy. Supporting its development for marine employment is the classification of Tipner West as a Tier 1 waterfront site in the Maritime Futures: Solent Waterfront Sites Report⁴⁹ (2015) by the Solent Local Enterprise Partnership (now 'Solent Partners').

⁴⁹ https://solentlep.org.uk/media/1341/maritime_futures_-_solent_waterfront_sites_-_169_15_.pdf

It was given this classification based on its attributes when assessed against three defined criteria namely marine access (water depth and access), presence of marine and maritime activities and development potential. The Solent is a prime location within the UK to deliver development to meet the pressing needs of the marine and maritime sector. This is recognised in its recent designation as a Freeport. A failure to meet the demands of the marine and maritime sector in the Solent could result in its growth potential not being attained with inward investment to the UK being compromised. New homes will be provided as a form of enabling development for the marine hub and the enhancement and re-use of the heritage assets on the site. There will be a new bridge linking not only the two halves of the site, but also linking the wider communities of Paulsgrove and Port Solent to the City Centre. The development will deliver urgently required sea defences for the northern part of Portsea Island and site de-contamination.

- 4.7 Tipner West is currently partly derelict and contains a number of unrelated land uses including a former Ministry of Defence firing range, boatyards, recycling, storage and a special educational needs school. The site is in need of significant remediation to address historic polluting uses. Its redevelopment, as recognised in the City Deal, presents an opportunity to vastly improve the quality of the environment in this part of the City, but critically to facilitate the delivery of necessary sea defences. These would together with site decontamination works, protect the integrity of the nearby nature conservation sites and associated habitats from harmful leachate contamination and inundation from flooding.
- 4.8 The site itself and the adjacent Portsmouth Harbour are important for nature conservation with the Harbour designated as a Special Protection Area (SPA) and Ramsar site, whilst also being recognised nationally as a Site of Special Scientific Interest (SSSI). In addition, the former firing range is recognised as a primary feeding site for Brent geese. These nature conservation issues will need to be addressed as part of any development on this site.
- 4.9 The coastline of Tipner West and a significant portion of Horsea Island East lies within Flood Zone 3. The north west corner of Horsea Island east lies within Flood Zone 1. Tipner West is covered by the North Solent Shoreline Management Plan (SMP) (section 5aPI01). The Portsea Island Coastal Strategy Study (PICSS) was developed to build on policies set out in the North Solent SMP. In addition to the North Solent SMP, Horsea Island East is also covered by the Porchester to Emsworth FCERM Strategy. These plans and strategies provide recommendations for flood management measures that should be implemented to protect residents from flooding. Further information can be found in the SFRA Level 2
- 4.10 The Local Plan is supported by a Habitats Regulations Assessment⁵⁰ (HRA). The objective of this assessment is to identify any aspects of the Plan that is considered likely to have a significant effect on a protected habitats site⁵¹ either individually or in combination with other plans or projects. The HRA concludes that the proposed

⁵⁰ <https://www.portsmouth.gov.uk/newlocalplanevidencedoch>

⁵¹ Any site which would be included within the definition at <https://www.legislation.gov.uk/ukxi/2017/1012/regulation/8/made>, as amended by <https://www.legislation.gov.uk/ukxi/2019/579/contents/made>, for the purpose of those regulations, including Special Areas of Conservation (SAC) and Special Protection Areas (SPA) (part of the National Site Network) and internationally designated Ramsar Sites."

development of Tipner West & Horsea Island East will have adverse effects upon the integrity of Portsmouth Harbour SPA and Portsmouth Harbour Ramsar site.

4.11 The Conservation of Habitats and Species Regulations 2017 do not allow competent authorities to consent plans or projects that may have an adverse effect on the integrity of a designated habitats site unless specific derogation tests are met. These tests relate to alternative solutions, imperative reasons of overriding public interest (IROPI) and compensatory measures. Government Guidance⁵² on the derogation tests was followed in the HRA of this Local Plan. The full results of all three derogation tests are set out in the HRA and conclude the following:

- There are no feasible alternative solutions to the Plan's proposals for Tipner West and Horsea Island East as set out in Policy PLP3 that would be less damaging or avoid damage to the designated sites.
- The benefits of the development enabled by Policy PLP3 amount to imperative reasons of public interest capable of overriding the adverse effects on the integrity of the Portsmouth Harbour SPA and Ramsar Site.
- There is sufficient land identified for delivery of necessary compensatory measures to demonstrate a high likelihood that sufficient compensatory habitat is capable of being secured at the planning application level.

4.12 The planning history of the site is long and complex. Part of the site was allocated along with Tipner East in the 2012 Portsmouth Plan. As part of the preparation of the current Plan a consultation was carried out focusing solely on a Tipner Strategic Development Area⁵³ in order to establish the most appropriate site boundary and land uses for the area. The responses to that consultation fed into the three options proposed in the Regulation 18 version of the Local Plan published in 2021. The first option proposed was for an innovative sustainable community or 'super peninsula' involving significant areas of land reclamation. This option along with a do-nothing scenario were ruled out by the City Council in October 2022, which then adopted Guiding Principles⁵⁴ for the site; these were updated by the City Council in March 2024⁵⁵ and form a material consideration in the preparation of this Plan.

4.13 The consideration of options has formed an important element of the extensive work done on this strategic site and is explained in more detail in the Sustainability Appraisal and the HRA. The development proposed in Policy PLP3 is a hybrid of the various options put forward for the site. It aligns with the overarching Project Objective that was noted by the City Council in October 2023 and an updated version of which was agreed in March 2024⁵⁶ as follows:

To create a marine employment hub in the Solent region with access to deep water, and of sufficient scale to enhance and expand the marine business cluster, along with critical

⁵²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82647/habitats-directive-iropi-draft-guidance-20120807.pdf ; <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁵³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf>

⁵⁴ <https://democracy.portsmouth.gov.uk/documents/s41717/Tipner%20West%20Report.pdf>

⁵⁵ <https://democracy.portsmouth.gov.uk/documents/s50877/240223%20-%20Tipner%20Cab%20update%20FINAL.pdf>

infrastructure, and sufficient housing to help enable delivery of the development as well as support the growth in the marine workforce.

- 4.14 The development proposed in Policy PLP3 is also consistent with the Guiding Principles, which seek to deliver nature-focused placemaking, maximise job creation in the marine hub and avoid or minimise land reclamation at this gateway site.
- 4.15 The City Council has sought to work in partnership with all interested parties in the development of Tipner West & Horsea Island East. There is a Coastal Concordat Working Protocol between the City Council as the Local Planning Authority, Natural England, the Environment Agency, the Marine Management Organisation, Historic England, the Royal Society for the Protection of Birds and the Hampshire and Isle of Wight Wildlife Trust. They are all members of a Regulatory Panel the purpose of which is to align consultation processes and avoid duplication in relation to the HRA and Environmental Impact Assessment. The Working Protocol and the minutes of all the Panel's meetings are published in a background paper⁵⁷.
- 4.16 The evidence base supporting this allocation is detailed and extensive. It is summarised in the Tipner West & Horsea Island East Topic Paper⁵⁸ and all relevant documents are included in the core document library supporting this Plan.

Vision

- 4.17 In 2040, Tipner West & Horsea Island East will form a new gateway to the City along with Tipner East and will be home to a new healthy and happy community. There will be a thriving new marine business hub that provides both jobs and opportunities for lifelong learning. People will live in good quality homes that are carbon neutral and will enjoy the new open space on Horsea Island. They will make fewer journeys by car and instead will make use of new and improved public transport connections and infrastructure, including a bridge to the mainland. New climate change resilient sea defences will defend the community alongside the existing residents of north Portsea Island. Historic land contamination will have been prevented from leaching into the Harbour. The Harbour's nationally and internationally designated saltmarsh and mudflat supporting populations of Brent Geese and wading birds will be cherished and protected, whilst the site's naval heritage will be positively enhanced in the public interest. The whole Tipner peninsula will be home to a community where residents, workers and visitors co-exist in harmony with nature.
- 4.18 It should be noted that the objective of the allocation for HRA purposes is made up of the overarching Project Objective, the vision for the site and the following policy.



Strategic Site Allocation Policy PLP3: Tipner West & Horsea Island East

- 1. Tipner West & Horsea Island East, as shown on the Policies Map, is allocated for the mixed use development of the following uses and large scale infrastructure:**

⁵⁷ <https://www.portsmouth.gov.uk/newlocalplanevidencedocw>

⁵⁸ <https://www.portsmouth.gov.uk/newlocalplanevidencedocj>

- a) A marine hub with a working quayside and up to 58,000 m² of marine employment floorspace (class E(g) offices, research and development, light industrial, B2 general industrial and B8 storage or distribution);
 - b) A new community with between 814 and 1,250 residential dwellings (class C3);
 - c) A bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only;
 - d) Flood defences along the peninsula edges of Tipner West and Horsea Island East in line with robust climate change scenarios;
 - e) Shops selling essential goods, including food, where the shop's premises do not exceed 280 m² (class F2a); and
 - f) Meeting places for the principal use of the local community (class F2b).
2. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:
- a) Create a new landmark gateway to the City of Portsmouth to be demonstrated through a conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code;
 - b) Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek. This will be achieved through the design of both buildings and spaces to create excellent connections with new development at Tipner East and the wider area. The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance;
 - c) Allow views to and from Tipner West and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base;
 - d) Integrate green and blue infrastructure into the masterplanning and design of the development and seek to mitigate the urban heat island effect;
 - e) Submission of a site-wide Arboricultural Impact Assessment is required, which includes a proposed Tree Removal, Replacement and Retention Plan and Tree Protection Plan that protects the trees of highest value.
 - f) Identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks;
 - g) Except for the minimum dredging necessary to establish and maintain deep water access to the marine hub, avoid the loss of or damage to SPA/Ramsar habitats. If that is not viable or feasible, minimise such loss or damage to that

required to enable the viable and feasible development of the site in line with the development quantum set out in this Policy whilst protecting the integrity of the international, national and local nature designations⁵⁹;

- h) Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritised;**
- i) Improve off-road pedestrian and cycle provision linking Port Solent and Tipner to the City Centre, nearby public open spaces including Horsea Island Open Space, recreational facilities including the Mountbatten Centre and other local shops and services;**
- j) Provide safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network;**
- k) Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment⁶⁰ and/or Infrastructure Delivery Plan⁶¹;**
- l) Mitigate likely significant effects from recreational disturbance to protected bird populations through a bespoke developer-provided package of measures for the lifetime of the development as advised by Natural England;**
- m) Provide for public access for all along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations;**
- n) Deliver appropriate surface water and foul drainage infrastructure together with required nutrient neutrality and water usage mitigation measures to support the Environment Agency in achieving and/or maintaining at least 'Good' water quality status and to protect designated habitats within the Portsmouth Harbour Waterbody (pursuant to the Water Environment Regulations);**
- o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2;**
- p) Deliver surface water management measures to make provision for storage during high tide events, when the surface water drainage may be subject to tide locking;**
- q) Mitigate and remediate contamination from current and historic uses; and**
- r) Provide a skills & employability plan for both the construction and occupation stages of the development.**

⁵⁹ Notably the Portsmouth Harbour SPA and Ramsar site, Portsmouth Harbour SSSI and Solent and Dorset Coast SPA – as required by the Habitats Regulations (2017) (as amended) and related national habitats legislation.

⁶⁰ <https://www.portsmouth.gov.uk/newlocalplanevidencedocu>

⁶¹ <https://www.portsmouth.gov.uk/newlocalplanevidencedocg>

- 3. The Listed Buildings located on Tipner West must be retained, restored and re-used. The Scheduled D-Day Slipways adjoining Horsea Island East must also be retained, and where feasible restored. Their fabric and setting must be conserved, and where desirable/possible enhanced. This will include the investigation, recording and safeguarding of known and potential finds of archaeological significance, including those as may be identified below mean high water springs.**
- 4. A segregated bus way, alongside a new pedestrian and cycle way between Tipner West and Horsea Island via a new bridge and on to Port Solent, will be established, operated and maintained.**
- 5. The deep water access to Tipner Point and the new marine hub quaysides will be maintained, with dredging as necessary, to support optimal boat access at all times whilst protecting the Scheduled D-Day Slipways and acceptable sediment transport conditions.**
- 6. A shadow, project level Habitat Regulations Assessment (HRA) will be required to be submitted along with the planning application, and as necessary for any phased applications, to the local planning authority as competent authority. On account of the fact that delivery of the Policy will inevitably result in the loss of some designated SPA/Ramsar habitat and will likely result in the loss of some functionally linked habitat, the HRA must among other things:**
 - a) provide sufficient evidence for the local planning authority to conclude, in consultation with Natural England and Secretary of State, that all three derogation tests have been passed.**
 - b) demonstrate that any loss of functionally linked habitat, including that identified as a primary or secondary support area in the Solent Waders and Brent Goose Strategy⁶, will be mitigated through the provision of replacement functionally linked supporting habitat of equal or greater quality and quantity, which fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds.**
- 7. An Environmental Impact Assessment (EIA) will also be required to be submitted along with the planning application, and as necessary for any phased applications, to the local planning authority.**
- 8. Whilst the City Council wishes to see a comprehensive development of the site, it recognises that planning applications may come forward separately or in phases. As well as complying with the development requirements set out above, all development proposals need to demonstrate consistency with other permissions granted and emerging proposals, including any Transport and Works Act Order, Harbour Revision Order, Marine Licence of other marine and environmental consents as may be required. All development proposals will be supported by appropriate site phasing and sequencing strategies to ensure a holistic approach is taken to the delivery of development. Planning applications will need to demonstrate potential landscaping or other solutions for land comprising later phases in the event that such phases do not come forward within an agreed timeframe.**

Supporting text

- 4.19 The purpose of this policy is to allocate Tipner West and Horsea Island East as part of a new gateway for Portsmouth with a new marine hub, homes, flood defences and a bridge.
- 4.20 The principal driver behind this allocation is the creation of a new marine hub. This will include a mixture of employment uses with the focus being on research and development and advanced manufacturing. Any offices provided on the site would be incidental to these uses and should be functionally linked to the marine hub.
- 4.21 The housing requirement is set as a range. The lower number provides the minimum number of homes required as part of the City Deal whilst the upper number provides certainty for the HRA in terms of impact on the integrity of the national and internationally designated sites.
- 4.22 The proposed bridge (and other works that might be deemed to affect navigation, such as dredging or reclamation) may be subject to separate consenting routes, including a Transport and Works Act Order (TWAO) or Harbour Revision Order application, alongside likely Marine Licence(s) and other environmental permits (unless incorporated within the TWAO). Applications for Orders are made by the developer(s) to the relevant Secretary of State rather than the City Council and in line with the relevant governing Rules⁶².
- 4.23 A local shop selling convenience goods for the local community will be allowed on the site. Although this floorspace is more than the ceiling set in Policy PLP29 for such shops, it is considered acceptable in order to support a sustainable community and reduce the need to travel.
- 4.24 Tipner West has a range of assets that are of historic interest, including the nationally important Tipner magazine complex (listed at Grade II), which comprises late eighteenth and mid nineteenth century magazines, shifting house, cooperage and boundary wall. To ensure that their value and the positive contribution that they can make to character of any scheme is fully realised, any development proposals for the site should be based on a detailed assessment, of the significance of the assets and their setting. This assessment must then positively inform any detailed design proposals for the site. Opportunities to provide public access to the heritage assets and/or their surroundings on Tipner West along with interpretation/explanation of their significance should be explored and are encouraged where feasible.
- 4.25 Second World War landing craft slipways are located on the southern shore of Horsea Island. They are the largest surviving remains of infrastructure created to support D-Day on 6th June 1944 at the end of the Second World War; a Research Report on the slipways has been published by Historic England ⁶³. They were designated as Scheduled Monuments in 2022 and all development proposals for the site should retain, conserve and where possible enhance the slipways and their setting. The Scheduled

⁶² <https://www.legislation.gov.uk/ukxi/2006/1466/contents/made>

⁶³

<https://historicengland.org.uk/research/results/reports/8244/HorseaIslandSecondWorldWarLandingCraftSlipways>

Portchester Castle is located approximately one mile to the north west of Tipner peninsula, across the open water of Portsmouth Harbour. Any development proposals for the site should also seek to understand the significance of the Castle and its setting, and where possible respond to the presence of the asset in terms of impact on views both from, and towards the Castle.

- 4.26 The policy set out in the North Solent Shoreline Management Plan⁶⁴ for this part of the coast is 'hold the line', which means maintaining or upgrading the level of protection provided by existing coastal defences. The Portsea Island Coastal Strategy Study⁶⁵ (2011) builds on the policies in the Shoreline Management Plan and sets out how the coastline surrounding Portsea Island will be managed for the next 100 years. The new flood defences that will protect both the site and the northern part of Portsea Island must be agreed in writing by the City Council as the Lead Local Flood Authority and the Environment Agency. It should be noted that any development proposed on land within 16 metres of a flood defence structure would require an Environment Agency defined Flood Risk Activity Permit FRAP. An adequate buffer should be maintained to allow management and maintenance works to the flood defence structure in the future. All applicants must therefore engage as early in the process as possible to deliver an appropriate buffer zone.
- 4.27 The site is flat and low-lying and a significant part of Tipner West lies in flood zones 2 and 3. It was assessed as part of the SFRA Level 2, which made a number of recommendations to avoid and control flood risk. Flood defences and ground raising will be required to enable development at this site. This should be informed by the SFRA level 1 and 2 and must incorporate detailed site specific wave overtopping calculations along with suitable calculations for freeboard.
- 4.28 Financial contributions may be sought where more vulnerable uses within the site will benefit from the development of future flood defence improvements.
- 4.29 New development should discharge runoff to the sea following suitable treatment. Storage of surface water should be managed when the sea level rises to a height that will not allow for drainage.
- 4.30 The site has a prominent location at the top of Portsmouth Harbour with views to and from prominent landmarks both within and beyond the City boundaries. A Landscape and Visual Impact Assessment prepared in accordance with the Landscape Institute's Guidelines⁶⁶ is required to identify the effects of the proposed development on views and on the landscape itself.
- 4.31 In addition to the range of international and national nature conservation designations relating to this strategic site, there are other forms of biodiversity, which form an important element of the collective nature conservation resource. These include the Elm Cultivar Trial on Horsea Island East managed by the Hampshire Wildlife Trust to protect White Letter Hairstreak Butterflies⁶⁷, which are identified as a species of principal importance under Section 41 the 2006 NERC Act. Development proposals should

⁶⁴ <https://www.northsolentsmp.co.uk/>

⁶⁵ <https://coastalpartners.org.uk/project/portsea-island-coastal-strategy/>

⁶⁶ <https://www.landscapeinstitute.org/technical-resource/landscape-visual-impact-assessment/>

⁶⁷ <https://butterfly-conservation.org/butterflies/white-letter-hairstreak>

identify and incorporate opportunities to conserve, restore and recreate their priority habitats and ecological networks.

4.32 In delivering a viable and feasible development in line with the City Deal, applications should seek to avoid or otherwise minimise adverse impacts upon the integrity of international and national habitat designations in line with the Habitat Regulations and in consultation with Natural England.

4.33 The Appropriate Assessment of the HRA prepared for this Local Plan concluded that the delivery of this Policy would have an adverse effect on the integrity of the Portsmouth Harbour SPA/Ramsar site. The HRA therefore considered the statutory derogation tests. The sequential legal tests for a derogation to be granted are:

1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site.
2. The proposal needs to be carried out for imperative reasons of overriding public interest (IROPI).
3. The necessary compensatory measures can be secured.

4.34 The HRA concluded that sufficient information exists at the Local Plan level to be able to conclude that these tests are met for the Tipner West and Horsea Island East (Policy PLP3).

4.35 A project level HRA, addressing all three derogation tests, will be required as part of any significant planning application for the site's development. As the details of development will be clear at the planning application stage, and there will be no further tier in the planning approval process, the project level HRA will be required to address the three derogation tests in substantially more detail than the Local Plan HRA. Engagement with the local planning authority and members of the Regulatory Panel including Natural England is encouraged from the beginning of this process.

4.36 The project level HRA should also address the impact of development on functionally linked habitats. It is likely that there will be a loss of habitat that is functionally linked to Solent's SPAs / Ramsars namely Primary Support Areas P60 and P76, as identified in the Solent Waders and Brent Goose Strategy. Furthermore, Core Area P75 lies within 100 metres of the allocation boundary. Core Areas and Primary Support Areas are functionally linked land that contribute to the integrity of SPA/Ramsar sites. All functionally linked habitat parcels lie in close proximity to the Portsmouth SPA/Ramsar, indicating that they are likely to be used by SPA/Ramsar waterfowl in order to minimise energy expenditure. Non-breeding bird surveys between October and March (typically two survey seasons) will be required to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity.

4.37 All loss of this functionally linked land should be mitigated in line with Policy PLP42: Solent Waders and Brent Geese Sites and the Mitigation and Off-setting Requirements set out in the Solent Waders and Brent Goose Strategy and to the satisfaction of the local planning authority and Natural England. The planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.

Monitoring and Delivery Framework

4.38 A key component of the phasing relates to the compensatory habitats required under the derogation tests of the Habitat Regulations. The compensation measures including the legal, technical and financial arrangements must be secured before the harm occurs. National Guidance states that compensation measures should normally be delivered before the first adverse effect on the designated sites occurs, as this reduces the risk of the project undermining the integrity of the network of sites.

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--|--|--|--|---|
| Sea defences, land decontamination and land raising/servicing | 2025-30 | | In line with site-wide approved phasing strategy and planning condition/legal agreement | To be completed prior to the commencement of development |
| 58,000 m ² of marine employment floorspace (class E(g) offices, research and development, light industrial, B2 general industrial and B8 storage or distribution) | 58,000 m ² 2035-40 with some likely to come forward beyond the plan period | The marine hub will be delivered through a successful bid for Government funding | In line with Site-wide approved phasing strategy and planning condition/legal agreement secured through TWAO | If not delivered in line with approved Site Wide Phasing Strategy and condition/legal agreement secured via TWAO. |
| 814 to 1,250 homes | 400 2025-35; 414-850 homes 2035-2040 with some likely to come forward beyond the plan period | The new flood defences will be delivered prior to the commencement of development | In line with Site-wide approved phasing strategy and planning condition/legal agreement | If not delivered in line with approved Site Wide Phasing Strategy and condition/planning obligations via legal agreement. |
| A bridge between Tipner West and Horsea Island East | 2025-40 | PCC as landowner is actively seeking external partners and funding | In line with the terms of any site planning permission as may be granted. | Development is unlikely to be able to proceed without prior delivery of the compensatory habitat. |
| Local shop and community facilities | Open for business when the first homes and business premises are occupied | Through the development Management process; working in partnership with developers and land owners | Housing and employment monitoring in the AMR | They should be delivered before the occupation of the first home |

Table 4.2: Monitoring and Delivery Framework for Tipner West & Horsea Island East
Tipner East

Introduction

4.39 Tipner East is a prominent site located immediately adjacent to the M275 motorway at the northwest part of Portsea Island. It is bounded by Tipner Lake to the north, which is part of Portsmouth Harbour, while to the south is the residential area of Stamshaw with terraced housing and a primary school. The site is allocated along with Tipner West & Horsea Island East in this Local Plan and together they will form a new gateway to the City. As discussed in the Development Strategy chapter of this Local Plan, the wider Tipner-Horsea Island area is one of the two principal sites identified in the Southampton and Portsmouth City Deal. A map of Tipner East is shown as figure 4.3.

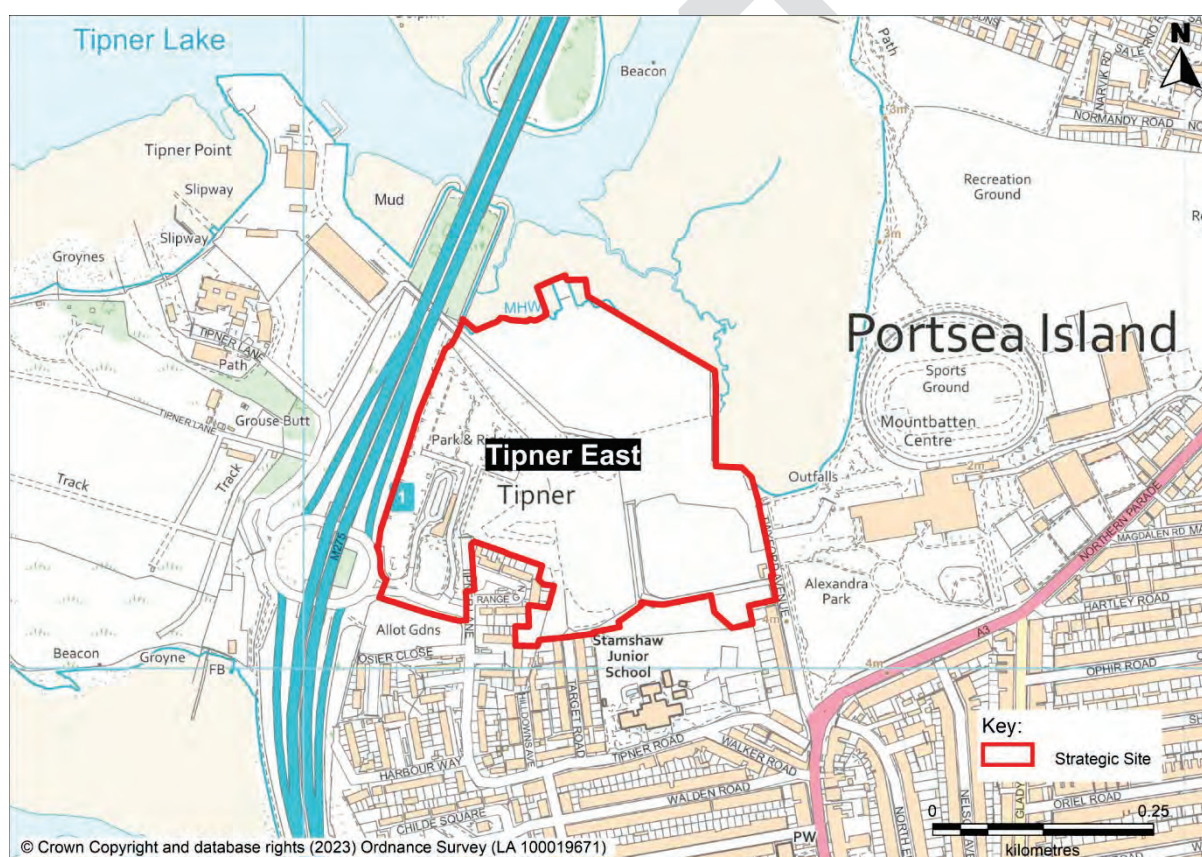


Figure 4.3: Map of Tipner East

4.40 The site is subject to a number of key constraints. It is adjacent to Portsmouth Harbour Ramsar, Portsmouth Harbour SSSI, Portsmouth Harbour SPA and Dorset and Solent Coast SPA. The likely significant effects of development have been considered through the Habitat Regulation Assessment (HRA) and several specific development requirements are included in the allocation policy to ensure no adverse impact on the integrity of the international designations.

4.41 The site is flat and low-lying and part of Tipner East lies in flood zones 2 and 3. Tipner East is covered by the North Solent Shoreline Management Plan (SMP) (section 5aPI01). The Portsea Island Coastal Strategy Study (PICSS) was developed to build on

policies set out in the North Solent SMP. These plans and strategies provide recommendations for flood management measures that should be implemented to protect residents of Portsmouth from flooding. Further information can be found within the SFRA Level 2

- 4.42 A new sea wall path and adjacent open space will be a considerable asset to the development, but will need to be closed when high tides and strong winds combine.
- 4.43 The map shows the location of the strategic site between the M275 motorway and the local highway network and close to the City's main leisure centre and a local primary school. It is important that development proposals do not increase the risk of rat running with motorists diverting off the motorway through the local road network. The two points of access to the site are Twyford Avenue and Tipner Lane. Tipner East is well served by sustainable transport routes. The Pilgrims Trail and the King Charles III England Coast Path pass through the site along with National Cycle Route 22.
- 4.44 The site has a long history of polluting land uses dating back to the 1860s. At the time of writing (2023) the remediation works were underway in line with the Construction Environmental Management Plan approved for planning application (10/00849/OUT).
- 4.45 Tipner East has been the subject of a number of planning applications, which have in turn provided a substantial body of evidence for the site. This includes the Environmental Impact Assessment Scoping Opinion for residential development (22/00003/EIASCO) plus the application for 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which have been approved pending the completion of legal agreements at the time of writing (Spring 2024). Further evidence on Tipner East is provided in the HELAA and the SFRA.
- 4.46 The development of a new multi modal transport hub for the City is a key component of the vision for Tiner East. The Government identified Portsmouth as one of several cities where concentrations of nitrogen dioxide are unlikely to be reduced without swift action. The City Council therefore introduced a Clean Air Zone in November 2021. The new transport hub at Tipner East should have a positive impact on air quality particularly at the City Centre Strategic Site allocated under Policy PLP6. The modal shift to more sustainable forms of transport outlined in Local Transport Plan 4 will reduce the number of private cars accessing the City Centre and encourage them to use the Park and Ride instead. The current Park & Ride facility opened in 2014 and provides 665 car parking spaces and a regular bus service into the City Centre. Outline consent was granted in 2022 for a multi-storey transport hub, which would replace the existing facility and provide a maximum of 2,650 car parking spaces along with ancillary commercial and leisure uses (22/00024/OUT). The new transport hub would serve the new residents and businesses of Tipner and facilitate lower on-site parking provision both here and in the City Centre. It will also help to meet the demand of car parking spaces from the nearby Portsmouth International Port and support the increase in cruise liners visiting the City. The City Council as the landowner and transport authority is actively seeking external partners and funding for the new transport hub.

Vision

4.47 In 2040, Tipner East will form a new gateway to the city along with Tipner West and will be home to a new healthy and happy community. People will live in good quality homes that are carbon neutral. There will be a new multi modal transport hub including a busy Park & Ride service to both the wider City and the international port. New climate resilient sea defences will defend the new community alongside the existing residents of north Portsea Island. Historic land contamination will have been prevented from leaching into the Harbour. The nationally and internationally designated saltmarsh and mudflat supporting populations of Brent Geese and wading birds will be cherished and protected. The whole Tipner peninsular will be home to a community where residents, workers and visitors co-exist in harmony with nature.

Strategic Site Allocation Policy PLP4: Tipner East



1. Tipner East, as shown on the Policies Map, is allocated for the mixed use development of the following uses:

- a) A new community with up to 1,056 residential dwellings (class C3);
- b) A new multi-modal transport hub with 840 m² ancillary commercial uses;
- c) A number of commercial and community uses including a convenience store, a restaurant/café and a community space;
- d) Flood defences in line with robust climate change scenarios.

2. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:

- a) Create a new landmark gateway to the City of Portsmouth to be demonstrated through a suitably scaled conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code;
- b) Break down the barriers, both physical and perceived, created by the M275 motorway and Ports Creek. This will be achieved through the design of both buildings and spaces to create excellent connections with new development at Tipner West and the wider area;
- c) Integrate green and blue infrastructure into the masterplanning and design of the development and seek to mitigate the urban heat island effect and uncomfortable/unsafe wind conditions;
- d) Incorporate car-free streets wherever feasible with reduced car parking standards and enhanced cycle parking with 'Mobility as a Service' and sustainable transport modes prioritised;
- e) Improve off-road accessible pedestrian and cycle provision linking Port Solent and Tipner to the City Centre, nearby public open spaces including Horsea

Island Open Space, recreational facilities including the Mountbatten Centre and other local shops and services;

- f) Provide safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network;
- g) Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan;
- h) Provide for public access along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations;
- i) Safeguard the routes of the Pilgrims Trail, the King Charles III England Coast Path and National Cycle Route 22 through the site;
- j) Any loss of supporting habitat identified in the Solent Waders and Brent Goose Strategy will be mitigated through the provision of replacement supporting habitat of equal or greater quality and quantity that fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds.
- k) A shadow, project level Habitat Regulations Assessment (HRA) will be required to be submitted along with the planning application(s) to the Local Planning Authority as competent authority. This must provide sufficient evidence for the Local Planning Authority to undertake an Appropriate Assessment, in consultation with Natural England, and to be satisfied that the mitigation measures proposed by the applicants would result in no significant effects upon the integrity of the National Site Network, whether alone or in combination with other plans and/or projects in the area;
- l) Deliver appropriate surface water and foul drainage infrastructure together with required nutrient neutrality and water usage mitigation measures to support the Environment Agency in achieving and/or maintaining at least 'Good' water quality status and to protect designated habitats within the Portsmouth Harbour Waterbody (pursuant to the Water Environment Regulations); and
- m) Deliver surface water management measures to make provision for storage during high tide events, when the surface water drainage may be subject to tide locking;
- n) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2;
- o) Mitigate and remediate contamination from current and historic uses; and
- p) Whilst the City Council wishes to see a comprehensive development of the site, it recognises that planning applications may come forward separately or in phases. As well as complying with the development requirements set out above, all development proposals need to demonstrate consistency with other

permissions granted and emerging proposals. All development proposals will be supported by appropriate site phasing and sequencing strategies to ensure a holistic approach is taken to the development. Planning applications will need to demonstrate potential landscaping or other solutions for land comprising later phases in the event that such phases do not come forward within an agreed timeframe.

Supporting text

- 4.48 The purpose of this policy is to allocate Tipner East as part of a new gateway for Portsmouth with homes and a new multi modal transport hub for the City.
- 4.49 The housing requirement will deliver a high density scheme in a prominent gateway location, which will be served by the new multimodal transport hub. The commercial uses at the transport hub could include a café, convenience shop, car share office, bicycle rental and ancillary offices. The commercial and community uses for the new housing estate could include a local convenience store, a community space and remote working office space.
- 4.50 With its new multi modal transport hub, Tipner East should be an exemplar for sustainable transport with Mobility a Service. Sustainable transport routes should be safeguarded and vehicular access carefully managed to preclude the development of a rat run through the estate. A low car use approach should reinforce strong links to public transport.
- 4.51 The site is flat and low-lying and a small part of Tipner East lies in flood zones 2 and 3. It was assessed as part of the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk.
- 4.52 Flood defences and ground raising will be required to enable development at this site. This should be informed by the SFRA level 1 and 2 and must incorporate detailed site specific wave overtopping calculations along with suitable calculations for freeboard.
- 4.53 New development should discharge runoff to the sea following suitable treatment. Storage of surface water should be managed when the sea level rises to a height that will not allow for drainage.
- 4.54 It is likely that there will be a loss of habitat that is functionally linked to the Solent SPAs / Ramsar sites namely Secondary Support Area 139 and Low Use Site P136. Furthermore, Low Use Sites P38 and P39 lie within 100 metres of the allocation boundary. All functionally linked habitat parcels lie in close proximity to the Portsmouth Harbour SPA/Ramsar, indicating that they are likely to be used by SPA/Ramsar waterfowl in order to minimise energy expenditure. Non-breeding bird surveys between October and March (typically two survey seasons) will be required to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity. All loss of this functionally linked land should be mitigated in line with Policy PLP42: Solent Waders and Brent Geese Sites and the Mitigation and Off-setting Requirements set out in the Solent Waders and Brent Goose Strategy and to the satisfaction of the local planning authority and Natural England. The planning application will need to be supported by a bespoke Habitats Regulations Assessment.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--|--|--|---|--|
| Enabling works and sea defence wall | 2023-2024 | Vivid are constructing the sea wall and associated infrastructure | Environment Agency | Underway |
| 1,056 homes | 431 (2025-2030) 625 (2030-2040) | Bellway and Vivid building out | Residential monitoring within the AMR | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |
| Transport hub with 2,650 car parking spaces and 38 bus services per hour | Phase 1 of 1 no. multi story car park and active travel hub by 2030; Phase 2/3 of 2 no. multi story car parks by 2035 | PCC as landowner is actively seeking external partners and funding | Monitoring of the Local Transport Plan (LTP4) | Reserved matters application needs to be permitted by June 2025 to keep extant permission |
| 716 m ² commercial floorspace | 2030-2035 | To be delivered along with the transport hub | Commercial monitoring within the AMR | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |
| 840 m ² ancillary commercial uses at the transport hub | 2030-2035 | To be delivered along with the transport hub | Commercial monitoring within the AMR | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |

Table 4.3: Monitoring and Delivery Framework for Tipner East

Lakeside North Harbour

Introduction

4.55 Lakeside North Harbour is Portsmouth's premier business location, which won Business Park of the Year in 2022 and Workplace of the Year in 2023 at the South Coast Property Awards. It is a key employment site within the sub-region, hosting businesses from a range of sectors including finance, legal, I.T, research and development,

marketing and public bodies and online retailers. It was originally built for IBM as a regional headquarters in the 1970s and has been owned by Portsmouth City Council since 2019. A map of the site is shown as figure 4.4.

4.56 Lakeside covers more than fifty hectares of land. One of its greatest assets is its parkland setting with a sizeable lake to the rear of the main buildings from which its name is derived. It currently comprises five, linked but distinct, offices known as Buildings 1000 to 5000. The main office campus is supported by on-site amenities located at Central Square as well as a Porsche car showroom, crèche facilities, a hotel and leisure centre and substantial surface car parking. It is bound by the strategic road network: the M27 to the south, A27 to the east and north and the M275 to the west. A shared footpath / cycle way runs to the north of the site, linking it to the City and the wider area, and a shuttle bus runs to the nearby Cosham District Centre.

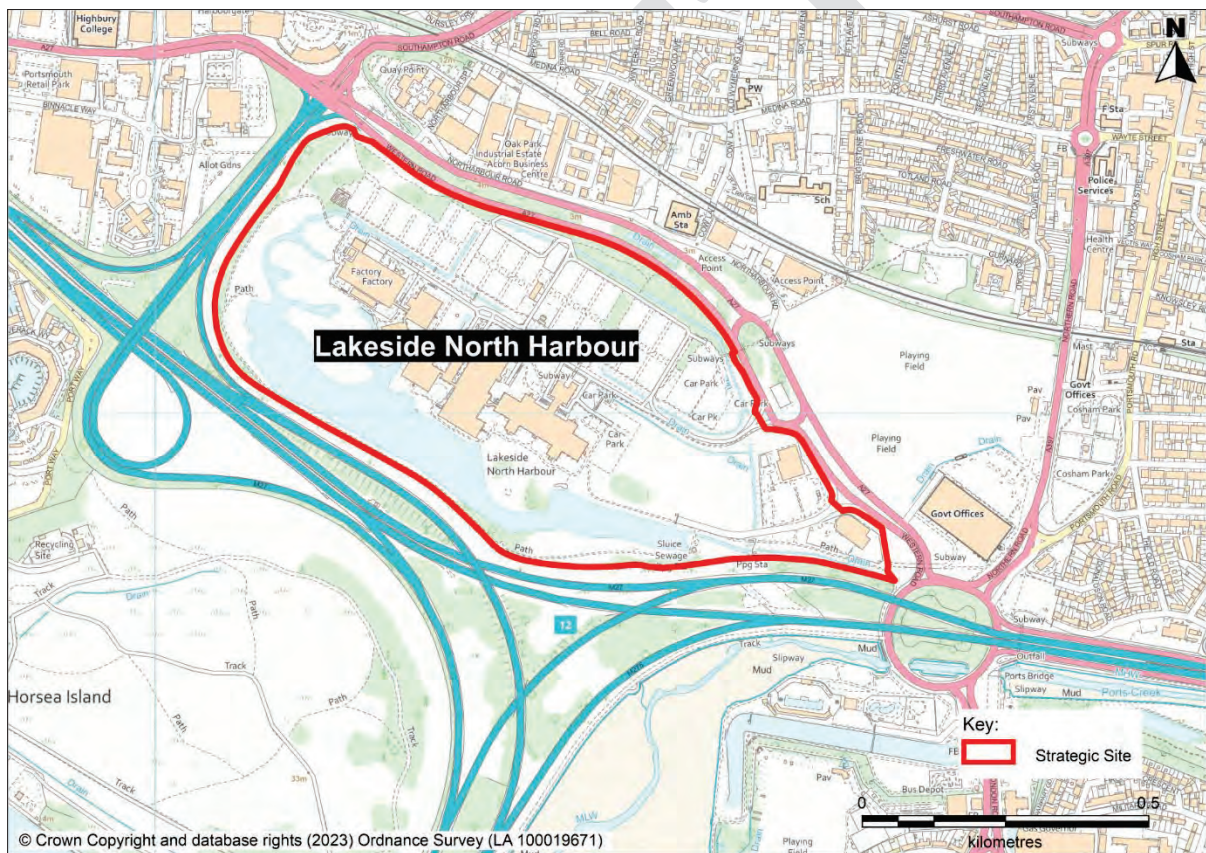


Figure 4.4: Map of Lakeside North Harbour

4.57 Lakeside has been assessed as both an existing and potential employment site in a number of studies including the Approach to Employment Land Study by the BE Group⁶⁸, which describes it as 'the primary location for B1 employment in Portsmouth'. The Business Needs, Site Assessments and Employment Land⁶⁹ Study by Lambert Smith Hampton describes 'the magnetic appeal of Lakeside (which) attracts the majority of occupiers seeking office space in Portsmouth'. Lakeside was assessed for its potential for commercial development in the HELAA and 50,000 m² of new office floorspace was

⁶⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-employment-land-study.pdf>

⁶⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-employment-land-study.pdf>

considered to be achievable due to its strong market appeal and well-managed and promoted image. The study noted that Lakeside commands prime rents as Portsmouth's premier office location and features an impressive occupier offer, facilities and efficient office layouts.

- 4.58 Lakeside was assessed in the Housing and Economic Development Needs Assessment⁷⁰ (HEDNA), which noted the high accessibility, high quality of the buildings and high quality parkland setting. In terms of the overall need and supply of offices in the City the HEDNA flags up an indication of a potential over-supply of office floorspace across the City unless there is a more pronounced return to office usage in the future. Lakeside is thriving as a business park with 94% occupancy as of summer 2023. This is in line with the 'flight to quality' whereby office tenants seek out prime office properties such as Lakeside. The HEDNA considered the allocation of the site for offices to be appropriate, but advised that a mix of other leisure, retail or commercial uses could be considered if new offices did not come forward during the plan period. It is therefore considered that the allocation will be implemented in the final five years of the plan period subject to market interest.
- 4.59 Planning permission has been granted for a number of development schemes at Lakeside over the years although not all of them have been implemented. This includes several highways and access improvement schemes including the formation of a new access road onto Western Road.
- 4.60 Lakeside was built on reclaimed land from the northern section of Portsmouth Harbour in the 1970s. This gives rise to a number of issues and challenges relating to biodiversity and flooding. Part of the site is designated as a Site of Importance for Nature Conservation (SINC) and is partially within an indicative high tide roost under the Solent Waders and Brent Goose Strategy (Secondary support area). The parkland provides opportunities for mitigating the impact of development on the SINC. It also provides considerable potential for on-site Biodiversity Net Gain. There are a number of trees on site of significant value, which are worthy of protection including some elms, which host White Letter Hairstreak Butterflies.
- 4.61 Lakeside is currently located entirely within flood zone 1. However, it is estimated that in 2122 much of the site will be in flood zones 2 and 3a. The site was assessed in the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. These are carried forward to the development requirements for the allocation.
- 4.62 Since Lakeside is a business park located on the edge of the City, one of its business attractions is the substantial on-site car parking available for employees and visitors to the site. In order to promote sustainable modes of travel to and from the site, all development proposals to expand the business offer must safeguard and where possible enhance pedestrian and cycle links to the City Centre and Cosham. The Strategic Transport Assessment has examined the benefits of the creation of a new access on to the Western Road (A27); these proposals have been identified as highly beneficial in enabling the site to be developed in a manner which addresses potential significant congestion on the adjacent local and strategic road networks and further details of the

⁷⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

supporting assessments are set out in the Transport Study and the Infrastructure Delivery Plan supporting the Local Plan.

4.63 The site is allocated for a total of 50,000 m² of new office floorspace in this Local Plan. The majority of the allocation would be through the intensification of the site with the re-development of a proportion of the extensive surface level car parking. This is considered suitable due to the proximity to bus, rail and cycle lane connections, and the likely continuation of home and hybrid working. The remaining part of the allocation is currently open grassland located between Building 1000 and the newly completed Village Hotel and Porsche Showroom. The site owner is working on a masterplan for the site and it is important that all development proposals are brought forward in a coordinated manner.

Vision

4.64 In 2040, Lakeside will still be the premier location for high quality business space in Portsmouth. It will be a thriving hub for new and expanding businesses set within a campus location where parkland and waterways are of recognised ecological value and where sustainable travel links to the City and wider locality are achieved.

Strategic Site Allocation Policy PLP5: Lakeside North Harbour



1. Lakeside North Harbour, as shown on the Policies Map, is allocated for 50,000 m² of new office floorspace class E(g)(i)
2. If a robust marketing campaign of at least twelve months, its scope having been agreed in writing in advance by the local planning authority, clearly demonstrates that there is insufficient market demand for new offices at this location, development proposals for other commercial uses that complement the existing office park will be allowed.
3. A new secondary access point at Lakeside to be provided on to the Western Road (A27) in accordance with the general arrangement plan (figure 12/GB01T23C11-dwg-101-8.1 in Appendix H) of the Strategic Transport Assessment, or such alternative as may be developed and agreed with PCC Highways.
4. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:
 - a) A masterplan and design code for the whole site should be prepared, submitted and approved as part of a site-wide planning application, to ensure that all future development at Lakeside is brought forward in a holistic manner;
 - b) A high standard and quality of design is achieved which is sympathetic to the existing high quality, campus-style setting of the business park and the areas and networks of recognised ecological value;
 - c) An Employment & Skills Plan for both the construction and occupation stages of the development shall be submitted with planning applications or otherwise agreed in writing through either a planning condition or s106 legal agreement, prior to the start of development;

- d) **To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked (Candidate Site P138) to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England;**
- e) **Biodiversity Net Gain of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) on site;**
- f) **An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site;**
- g) **A site specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan;**
- h) **Flood management measures should be incorporated within the site in accordance with the SFRA Level 1 and 2 to reduce the risk to more vulnerable development and key infrastructure now and in the future;**
- i) **Proposals for surface water management should make provision for storage during high tide events, when the surface water drainage may be subject to tide locking;**
- j) **The provision of a Sustainable Drainage System (SuDS) to mitigate the risk of surface water flooding;**
- k) **Evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority;**
- l) **Effective access arrangements that are safe and suitable for all users;**
- m) **A Travel Plan to minimise car use by current and prospective occupants of Lakeside and to maximise use of sustainable modes of transport;**
- n) **Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan.**

Supporting text

- 4.65 The purpose of this policy is to allocate land for the expansion of Lakeside and consolidate its position as the City's premier business location.
- 4.66 The provision of 50,000 m² of new office floorspace at Lakeside will provide opportunities for Portsmouth's premier business park to provide more first class accommodation for businesses in South Hampshire. It is expected that the office development would come forward towards the end of the plan period.
- 4.67 Other commercial development will be permitted if robust evidence is provided that there is no market interest in new offices on the site. A marketing period should be agreed in writing in advance with the local planning authority and should follow as a minimum the requirements set out in Appendix 4 of the Local Plan.
- 4.68 The site was found to be unsuitable for housing both in the HELAA and the HEDNA for two overarching reasons. Firstly, housing would diminish the high quality business offer of Lakeside. Secondly, the site is not a sustainable location for housing as it is remote from local facilities, is bounded by busy roads and would be an isolated place to live.
- 4.69 The previous development proposals for the site included an indicative design for a new access point on to the A27 Western Road; this would take the form of a "left in, left out" junction which would allow westbound traffic from the site to avoid the existing main access. Testing undertaken as part of the Strategic Transport Assessment (STA) has shown that providing this access would have a significant beneficial effect on traffic circulation in the area (including significantly reducing the risk of "blocking back" of traffic in the peak hours toward the Portsbridge Roundabout). The exact form of the access would be subject to further discussion with PCC Highways and amendment to reflect any new site Masterplan, however, figure 12/GB01T23C11-dwg-101-8.1 in Appendix H of the STA shows the general arrangement of the required junction, and delivery of this infrastructure will be required as part of the wider scheme.
- 4.70 All development proposals for this strategic site should form part of a masterplan, which should include a design code to be agreed in writing by the local planning authority. It is important that the new business premises complement the existing buildings and enhance Portsmouth's premier office location in accordance with Core Policy PLP1.
- 4.71 The Portsmouth Economic Development and Regeneration Strategy seeks to address skills and education deficiencies in the City. Employment and Skills Plans at both the construction and occupation stages of development are a practical way that local people can benefit from development. Advice should be sought from the City Council at the earliest opportunity on the matter.
- 4.72 The south eastern part of Lakeside is identified as Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Surveys will need to be carried out in accordance with Policy PLP42: Solent Waders & Brent Geese Sites of this Local Plan and the Guidance on Mitigation and Off-setting Requirements⁷¹ Non-breeding bird surveys may be required between October and March (typically two survey seasons) to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting

⁷¹ <https://solentwbgs.files.wordpress.com/2021/03/swbgs-mitigation-guidance-oct-2018.pdf>

habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity in line with Policy PLP42 of this Local Plan and the Guidance on Mitigation and Off-setting Requirements and to the satisfaction of the local planning authority and Natural England.

- 4.73 The City Council is seeking the provision of 20% biodiversity net gain on strategic sites, which it owns. The parkland setting of Lakeside should provide ample opportunities to achieve this. This should be done in accordance with Policy PLP40 of the Local Plan and the version of the Government metric current at the time of the application.
- 4.74 There are a number of individual trees and groups of trees on the site that are of value and worthy of retention. Over two hundred of the trees are covered by individual Tree Preservation Orders (TPO) and there is one Mixed Woodland TPO. The findings of the Arboricultural Impact Assessment and Arboricultural Method Statement should inform the Tree Protection Plan to be agreed in writing by the local planning authority.
- 4.75 Lakeside is currently located entirely within flood zone 1. However, it is estimated that in 2122 much of the site will be in flood zones 2 and 3a. The site specific flood risk assessment should incorporate recommendations set out within both the SFRA Level 1 and 2 to demonstrate how flood risk will be managed to ensure that the development is safe over its lifetime. Flood risk management measures such as appropriate land raising will be required to enable development of more vulnerable uses, key infrastructure and safe access and escape routes. This should be informed by the SFRA level 2.
- 4.76 New development should discharge runoff to the sea following suitable treatment. Storage of surface water should be managed when the sea level rises to a height that will not allow for drainage.
- 4.77 Details of a suitable sustainable drainage system that mitigates the risk of flooding must be agreed in advance with both the local planning authority and the Lead Local Flood Authority.
- 4.78 Lakeside is located on an historic landfill associated with the reclamation of land in Portsmouth Harbour. Development at the site, including piling foundations, poses risks to groundwater from mobilising contaminants and creating new pathways for pollutants.
- 4.79 Lakeside is bounded by the strategic road network and there is a substantial quantum of surface level car parking. In order to service the new commercial premises planned for the site, a new access on to Western Road may be necessary. Any new access arrangements for the site should be agreed in writing with both the local planning authority and the local highway authority. It is important that non-motorised access is both protected and enhanced as part of any new access proposals.
- 4.80 All Travel Plans proposed for the site should comply with Policy PLP47: Movement and Transport of the Local Plan, the Local Transport Plan 4 (2021 –2038) and any successor documents and the Local Cycling and Walking Infrastructure Plan and any successor documents.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|---|-----------|---|--|---|
| 50,000 m ² new office floorspace | 2035-2040 | Private sector development in response to business interest | Through the development Management process; working in partnership with developers and land owners | If lack of interest is demonstrated in new office floorspace through a robust marketing campaign then other commercial uses will be allowed |

Table 4.4: Monitoring and Delivery Framework for Lakeside North Harbour

Portsmouth City Centre

Introduction

4.81 Portsmouth City Centre is recognised as a focal point for new development and regeneration for the City and the sub-region. Given its importance to the City and wider region, the Council is committed to the regeneration of the City Centre to create a thriving, attractive, and vibrant environment for its residents, businesses and visitors. A map of the site is shown as figure 4.5.

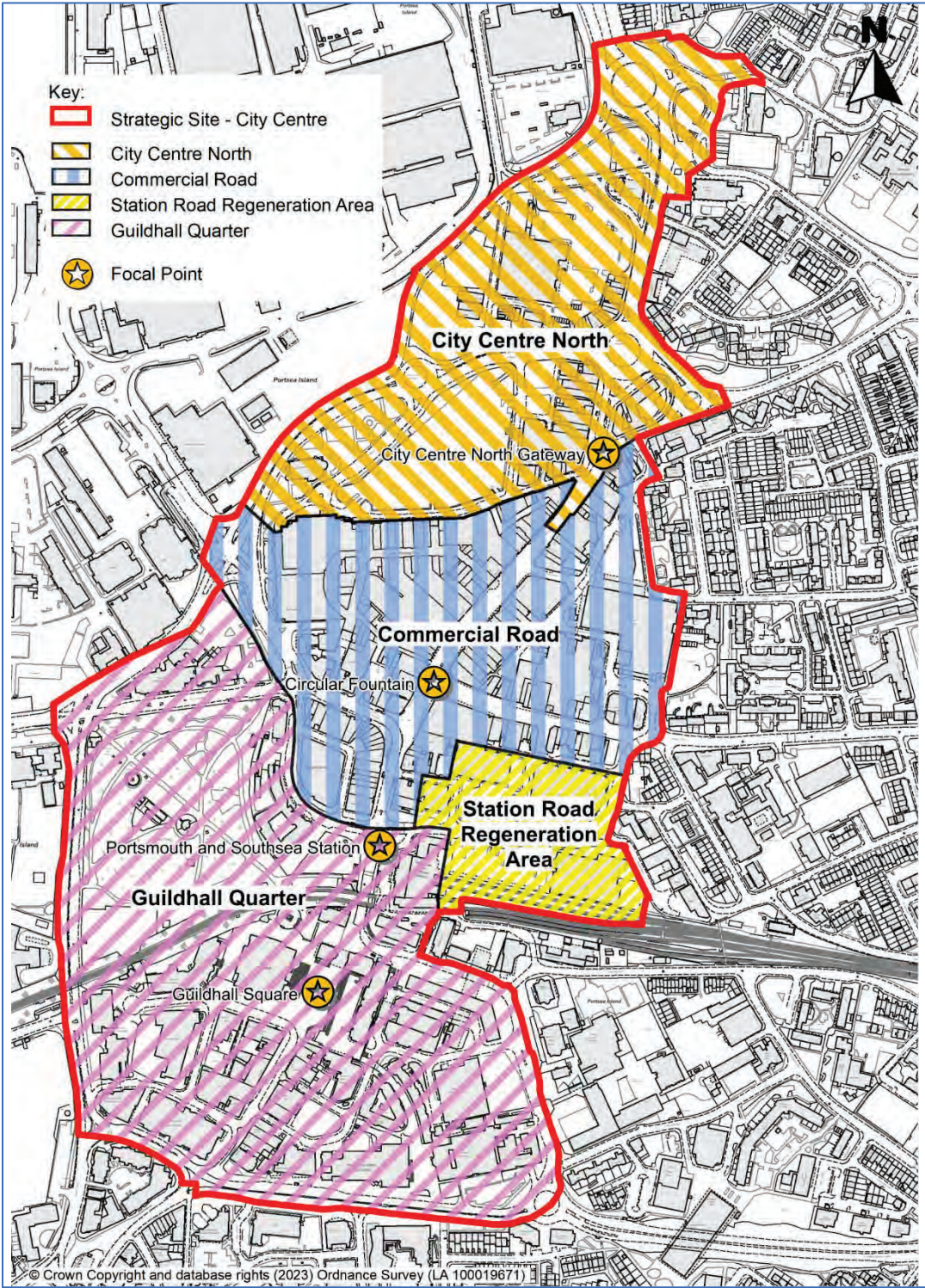


Figure 4.5: Map of Portsmouth City Centre

4.82 Located to the centre-west of Portsea Island, the City Centre is an area of some 60 hectares extending from Hope Street in the north to Guildhall Walk and Winston Churchill Avenue to the south. Directly adjacent to the west of the City Centre lies the HM Naval Base. To the east and south lies the respective residential areas of Buckland, Landport and Somerstown. At the heart of the City Centre is the Commercial Road shopping area, which also includes the shops and commercial uses on Arundel Street and in the Cascades Shopping Centre. To the south of Commercial Road lies

Portsmouth & Southsea Railway Station, itself a Grade II listed building, with a railway viaduct forming a physical barrier to the area to the south. This area has seen some recent development in the form of purpose-built student accommodation. To the west lies the ever popular Victoria Park (Grade II listed Park and Garden) and Portsmouth St John RC Cathedral (Grade II listed building). The southern area of the City Centre comprises the civic areas of the Guildhall and its square. Opposite the Guildhall lies the Civic Offices. To the South is Guildhall Walk, which is known for its cultural and leisure offer with pubs, restaurants and cafes plus it is the home of the refurbished and extended New Theatre Royal. Adjoining Winston Churchill Avenue are the law courts, the police station and student accommodation.

4.83 The site is currently located within flood zone 1, although it is predicted that by 2122 the southwest portion of the site will be located within flood zones 2 and 3. More vulnerable development should provide mitigation and ensure safe access in these locations. Development should take account of the recommendations set out within the SFRA Level 2, in particular, relating to surface water flooding.

4.84 It is considered that, through long-term redevelopment, the City Centre has the potential to become a diverse, vibrant and attractive area that has the capacity to deliver a large number of new homes, business premises, social/leisure venues and community facilities. This will make a major contribution to meeting the City's development needs and strengthen the identity and vitality of the City Centre and its economy including both the daytime and nighttime activity.

4.85 There have been several attempts to redevelop the City Centre North, which lies north of Charlotte Street. The area occupied by the former Tricorn Centre was proposed for redevelopment in the 2000's as a retail led scheme. Changes in the retail market away from high street retailers and to online shopping combined with the late 2000's recession meant that these proposals were not realised. In 2013 the City Council published a City Centre Masterplan⁷². This sets out a development strategy for the City Centre, including an approach to development for the following specific areas:

- Commercial Road Shopping Area: Proposals focused on the reconfiguration of the road network to improve pedestrian connectivity, the delivery of environmental improvements to Commercial Road including the pedestrianisation of Edinburgh Road and Commercial Road south to create a new space for the city centre's market.
- North of Market Way: Proposals for this area focused on the reconfiguration of the road network and improve pedestrian and public transport.
- Station Square and Station Street: Proposals for this area included the development of a business hub for the City supporting at least 10,500m² of office space, and encouraged the creation of a transport interchange on Station Street.
- The Guildhall Area: Proposals for this area were for the Guildhall to become the heart of the City's civic and cultural life. Guildhall Walk was identified for its early evening economy role. Though restrictions to the amount of drinking establishments, takeaways and nightclubs were also proposed.

⁷² <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-city-centre-masterplan-supplementary-planning-document-SPD.pdf>

4.86 In 2021 the City Council published a City Centre Development Strategy⁷³. The Development Strategy set out 12 design principles for the City Centre to be Welcoming, Connected, Diverse, Delightful, Beautiful, Green, Healthy, Safe, Enduring, Resilient, Intelligent and Playful. The Development Strategy divided the City Centre into five areas with proposals for each. The areas were as follows:

- Landport Gate (north of Hope Street) - For this area the Development Strategy considered a mix of residential and employment options across a number of blocks of up to 20 storeys in height.
- New Landport (between Charlotte Street and Hope Street) - For this area the Development Strategy proposed a residential led mixed use development including commercial and civic uses. The Strategy proposed development heights of between 3 and 10 storeys in this area.
- Paradise (Commercial Road and the surrounding retail areas) - For this area the Development Strategy proposed retail at ground floor level with residential above in buildings of up to 6 storeys. The Strategy also proposed a new park within this area of the City Centre.
- Work Station (bordering Stanhope Road and Station Road) - For this area the Development Strategy proposed a mix of commercial and residential buildings in a range of between 6 and 20 storeys. In addition a new square / public open space was proposed for Portsmouth and Southsea Station.
- Guildhall and Victoria (north of Winston Churchill Avenue / south of Portsmouth and Southsea Station and Victoria Park) - For this area the Development Strategy proposed a residential led mix of uses in the 4 to 15 storey range.

4.87 Since the City Centre Masterplan and City Centre Development Strategy were written there has been a significant amount of new and proposed development proposed in the City Centre. There has been significant purpose-built student accommodation built in the City Centre including Catherine House, Stanhope House and Crown Place. Some of the most notable proposals coming forward include the: Outline planning application (22/01243/CS3) for City Centre North which proposes the demolition of existing buildings and the construction of up to 2,300 residential units, and up to 10,000 m² non-residential uses. City Centre North also proposes the realignment of the Road network, most notably the diversion of traffic onto Hope Street and developing part of the area currently occupied by Market Way. There have also been proposals for residential and hotel uses for the Slindon Street Post Office (20/00407/OUT / 20/00152/FUL) and proposals for residential / hotel development at land adjacent to Catherine House (17/01807/FUL). There are also further proposals in pre application planning for the former Debenhams site and former Matalan sites.

4.88 There is a range of evidence based studies supporting the allocation of this strategic site. This includes the HELAA, which identified a total of thirteen sites in the City Centre with potential to deliver 4,158 dwellings and 20,000 m² of gross employment floorspace (1,546 m² net gain when losses are taken into account). The Portsmouth Emissions Based Assessment⁷⁴ looked at the City Centre because poor air quality is a recognised issue with three AQMAs designated in the vicinity (7, 11 and 12). The assessment found that there is a predicted increase in NO_x in the short term impacting parts of AQMA 11,

⁷³ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Portsmouth-City-Centre-Development-Strategy-Jan-21_compressed.pdf

⁷⁴ <https://www.portsmouth.gov.uk/newlocalplanevidencedocx>

however it is expected that the NOx emissions will substantially decline across the plan period, due to changes in the vehicle fleet. Further detailed modelling may be needed to investigate if additional short-term mitigation is required.

Vision

4.89 In 2040, Portsmouth City Centre will fulfil its potential as a centre of culture and creativity for the City. There will be a thriving business and retail offer centred around Commercial Road and enhanced cultural provision focused on Guildhall Square and Guildhall Walk. The new park at City Centre North and the historic Victoria Park will, along with tree lined thoroughfares, make it a green and pleasant centre for residents and visitors. People will live in good quality homes, which are carbon neutral and located close to jobs and bustling services. People will make fewer journeys by car and instead will make use of new and improved public transport connections including the enhancing Portsmouth and Southsea Train Station. Rapid Transit Improvements will provide easy access to wider South Hampshire including its two national parks, London and the continent. It is the home of Portsmouth University, which will be one of the top one hundred young universities in the world. Overall, the new City Centre will be a green cultural centre for the City, which is home to a happy, healthy and thriving community.



Strategic Site Allocation Policy PLP6: Portsmouth City Centre

1. Portsmouth City Centre, as shown on the Policies Map, is allocated for the comprehensive mixed-use development of the following uses:
 - a) 4,158 dwellings;
 - b) 20,000 m2 office class E(g)(i) floorspace (1,546 m2 net)
 - c) A new 2.9 ha park at City Centre North.
 - d) Culture, arts, civic and leisure uses;
2. Development proposals for the above named uses will be permitted provided that where appropriate they meet the following site-specific development requirements:
 - a) Enhance the range of City Centre commercial uses;
 - b) Protect and enhance the existing open spaces as shown in figure 4.5;
 - c) Improve pedestrian and cycle connectivity to the surrounding residential areas;
 - d) Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritised;
 - e) Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan;

- f) **Take opportunities to improve air quality and mitigate negative impacts on air quality in the adjoining AQMAs;**
 - g) **Evidence is provided on the current and historical contaminative uses of the site and provision made for any necessary remediation;**
 - h) **Complement the proposals set out in the University of Portsmouth Estate Masterplan where relevant;**
 - i) **Major development in the City Centre should demonstrate how its design enhances the centre's appearance and considers the needs and safety of all its users including reducing crime, through the provision of a design code;**
 - j) **Major development including major commercial development should provide an employment and skills plan to demonstrate how the proposals provide opportunity for local workers;**
 - k) **Major Development should provide a travel plan to demonstrate how it is contributing to a shift to sustainable and public transport in in the centre; and**
 - l) **Development protects trees within the City Centre and takes opportunities to plant more and provide enhanced greening.**
 - m) **Major Development should provide a travel plan to demonstrate how it is contributing to a shift to sustainable and public transport in in the centre;**
 - n) **Development protects trees within the City Centre and takes opportunities to plant more and provide enhanced greening.; and**
 - o) **An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site;**
- 3. Proposals for the comprehensive redevelopment of the City Centre North (as shown in figure 4.5) for 2,300 dwellings and 20,000 m² of new office floorspace and provision of a new green space will be supported. These proposals will have to demonstrate that they create a new residential community with a focus on delivering integrated green space, connectivity and promote community integration. Proposals at the City Centre North Focal Point should look to create a gateway to the City Centre North Development linking it to the northern end of Commercial Road. Proposals in City Centre North should include the following elements within a master plan; a Large Urban Green green space; Improved Connections to wider neighbourhoods and amenities; Streets and Squares for play and socialising; commercial opportunities; a new Primary Mobility Hub at Commercial Rd; and creation of a cyclable and walkable neighbourhood. Biodiversity Net Gain of at least 20% is demonstrated and secured in perpetuity (at least 30 years) on site. Proposals must take into account the character and significance of the Mile End Conservation Area by minimising harm to the significance and appreciation of the conservation area, and responding sensitively to St Agatha's Church (Grade II*) and All Saint's Church (Grade II) in terms of massing, scale and orientation.**

- 4. Proposals falling within the City Centre Commercial Area (as shown in figure 4.5) should include town centre uses at ground floor level. Proposals which retain and enhance active frontages in this area including outside / street seating will be supported. Outside of the commercial frontages schemes that deliver high-density mixed-use development will be permitted provided they improve connectivity between the retail area, and the surrounding areas and contribute to a modal shift to sustainable transport. Proposals within this area should provide space to accommodate and avoid negative impact on the markets which use Commercial Road. Interventions at the Arundel Street Focal Point should protect and enhance the fountain and take opportunities to utilise the space for cultural events.**
- 5. Development within the Station Road Regeneration Area (as shown in figure 4.5) will be permitted where they provide a significant contribution to the City's housing and other needs by providing good quality, high density and tall buildings. Proposals impacting the area around Portsmouth and Southsea Train station should contribute to improved connectivity and street scene within the City Centre, without unacceptable harm to the historic environment. Proposals in this area should create a gateway to the City linking the commercial core around Commercial Road to the Cultural and Civic Centre focused on Guildhall Square and Guildhall Walk.**
- 6. Proposals within the Guildhall Cultural Regeneration Quarter (as shown in figure 4.5) will be permitted where they contribute to the existing mix of cultural, civic and town centre uses. Development within this area should protect and enhance the significance including the setting of heritage assets and look to raise the overall quality of the area's-built environment. By sensitively incorporating the area's listed buildings and responding positively to their significance and the wider historic environment, proposals should help to enhance the character and appearance of and the Guildhall & Victoria Park Conservation Area. The Guildhall Square and Guildhall Walk will be a focal point for cultural, community, and civic development. Proposals that reinforce this role will be supported. Proposals that create active frontage facing onto Guildhall Square will also be supported.**

Supporting text

4.90 The purpose of this policy is to shape new development within Portsmouth City Centre so that it will adapt and thrive into the future. The City Centre will be a culture and leisure destination and provide a large number of new homes and significant office space to meet the future needs of the City.

4.91 The City Centre is one of the main locations for residential (4,158 dwellings) and commercial (20,000m² sqm gross, 1,546m² net) development in the City to 2040. Within the City Centre there are a number of existing commercial buildings such as the Slindon St Post Office which are proposed to be reused for residential; this results in a reduction in the overall gain in office space. Within the City Centre that main area of development is expected to be City Centre North with provision for a total for 2,300 dwellings and all of the commercial floorspace. In addition to City Centre North, there is a cluster of residential development coming forward around Station Road, with large development sites at Debenhams, Matalan, the former sorting Office and adjacent to Catherine

House. In addition to these areas there is anticipated to be further infill housing development within the centre.

- 4.92 Proposals should protect and enhance the retail offer of the City Centre, as set out in Policy PLP28: Town Centres and have regard to enhancing / complimenting the main focal points for intervention as set out in this policy. It is anticipated that with current retail trends away from traditional big box retailers and the large scale of new residential development proposed in and around the City Centre that the role of the centre will change over the plan period. The City Centre will become more a culture and leisure focused destination with an increase in the food and drink offer and more independent retailers.
- 4.93 With the exception of Victoria Park there is little open space within the City Centre. It is important therefore that any proposals which impact the open spaces within the City Centre seek to protect and enhance these spaces and their role. This needs to include careful consideration of active frontages/ and access to these spaces as well as the visual impact of buildings on the spaces.
- 4.94 The proposals at City Centre North include the provision of a significant open space in the form of a new green space. It is important that any revised proposals retain this provision and consider carefully the green space's future users and potential for delivering biodiversity net gains.
- 4.95 The City Council is seeking the provision of 20% biodiversity net gain on strategic sites, which it owns. The City Centre North portion of the City Centre allocation is Council owned, and therefore a target for 20% BNG is being applied to this area. As the City Centre has a low baseline level of biodiversity, there is a significant opportunity to make a positive impact in increased biodiversity. This should be done in accordance with Policy PLP40: Biodiversity Net Gain and the version of the Government metric current at the time of the application.
- 4.96 Proposals should deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment; Infrastructure Development Plan and / or Local Transport Plan (LTP4). Any severe impacts on the highways network identified as resulting from development as part of the City Centre strategic site must be mitigated following a robust assessment and reduce the impact of traffic to an appropriate level. Any assessment must consider the projects included within the LTP4 and contribute to their delivery where appropriate.
- 4.97 Proposals should encourage a shift to more sustainable modes of transport incorporating 'mobility as a service' such as Electric Cycle and Scooter Hire and should incorporate increase cycle parking provision as set out in Policy PLP47: Movement & Transport.
- 4.98 Air quality in proximity to the City Centre Road network is a recognised issue and in response to this the City Council has implemented a Clean Air Zone which covers the City Centre Area which imposes charges on the most polluting vehicles. The Portsmouth Emissions Based Assessment⁵ found that there is a predicted increase in NO_x in the short term impacting parts of AQMA 11, however it is expected that the NO_x emissions will substantially decline across the plan period, due to changes in the vehicle fleet.

Development proposals should take opportunities to improve air quality and mitigate negative impacts on air quality in the adjoining AQMA's as required.

- 4.99 Proposals within the City centre should consider the provision of reduced levels of parking in line with Policy PLP48 and the emerging Parking Supplementary Planning Document, and inclusion of infrastructure for sustainable forms for transport in order to create further modal shift. Wherever possible development should include car free streets, which should link to the existing pedestrianised routes in the City wherever possible. Proposals for further pedestrianisation and for closing roads to private cars will be welcomed. Major Development should provide a travel plan as part of the evidence submitted in order to demonstrate how it is meeting these objectives.
- 4.100 Proposals on the southern edge of the City Centre should take account of the Estate Masterplan⁷⁵ produced by the University of Portsmouth, and developers should work positively with the University as the major landowner in that part of the City.
- 4.101 The City Centre is one of the least green parts of the City. Proposals should wherever possible retain tree cover, protect trees cover by TPO (TPO148, TPO0050, TPO069), and take opportunities to green both spaces and buildings in the City Centre through the use of the Urban Greening Factor in line with policy PLP38: Green Infrastructure.
- 4.102 Major development in the City Centre should demonstrate how its design enhances the centre's appearance and considers the needs of all its users, through the provision of a design code. This should include detailed consideration of the needs as defined through equalities impact assessment, and the protected characteristics of those users.
- 4.103 The following sections of supporting text relates to the areas and focal points identified in figure 4.5.

City Centre North

- 4.104 City Centre North currently comprises a surface level car park to the north of the Cascades formerly occupied by the Tricorn Centre, the site of a former Sainsbury's store and a number of tired commercial units and surrounding surface level car parks. In addition the listed church, of St Agatha's, falls within the site area. The area is proposed for significant redevelopment for 2,300 dwellings, and 20,000 m² of commercial floorspace. The following paragraphs set out the key aspects of the development proposals.
- 4.105 A substantial new green space will create a new link between St Agatha's and All Saints Church with extended links to the south to Victoria Park and enabling future connections to the north creating a safe network of cycle paths and pedestrian routes. Creating green connections to the City through the implementation of green corridors, green spaces parks and playgrounds will be used to improve the well-being for the wider community as well as the residents on site. Green avenues will be created to reach out from the central green space and aim to link out to the wider city centre. These additional green spaces will aim to promote an active lifestyle whilst allowing the community to rediscover the local ecology. City Centre North is expected to deliver 20% Biodiversity Net gain, this is over and above the standard applied elsewhere in the City Centre and wider City centre as a whole as the site in City Council ownership and the Council

⁷⁵ <https://www.port.ac.uk/sites/default/files/2022-10/uop-estate-masterplan-section-3-and-4-sep-2016.pdf>

intends to take a proactive approach to Biodiversity on its assets. Proposals should protect and incorporate the existing mature trees on the eastern side of Flathouse Road, which the City Council is proposing to protect with TPO's.

4.106 City Centre North is the single largest development site in the City with the potential to deliver 2,300 dwellings. In order to do this the development will need to make careful use of both density and height. Proposals will need to carefully consider how larger buildings fit within the setting of the area. The northern part of the City Centre North site is potentially suitable for larger / taller buildings. Consideration will need to be given to the interaction with Hope Street and the Dockyard, as well as the frontages facing the new green space. There is potential within the scheme to create new landmark taller buildings, with heights of upwards of 20 storeys possible if well designed. An additional important consideration will be how development, especially any tall buildings, would impact on the character of the Mile End Conservation Area, including the birthplace of Charles Dickens, which is a Grade I listed building. This area manages to remain a haven of relative tranquillity. The Mile End Conservation Area Guidelines state that "The Conservation Area is separated from modern development by the boundary wall which blocks off Old Commercial Road at its southern end and serves both as a pedestrian entranceway into the Conservation Area and as a screen to mask the area from modern development". The effectiveness of such screening needs to be considered when large scale development is proposed.

4.107 The development of City Centre North should encourage a modal shift away from the use of the private car to prioritise use of sustainable transport given the sustainability of its location. This should be done in a number of ways including: removing Market Way and associated junctions; ensuring pedestrian and other sustainable transport connection to the wider City Centre and City; creating slower routes along Commercial Road that connect back to Queen Street; allowing for a safer and more enjoyable Proposed Pedestrian Routes; providing safer route connections to the wider cycle network in Portsmouth; creating pedestrian routes around the Cascades Centre, Victoria Park, Flathouse Rd, Ferry Port, Commercial Road retail & Conservation areas.

City Centre North Gateway Focal Point

4.108 The large-scale development at City Centre North will need to connect to the City Centre at the northern end of Commercial Road. This gateway will play an important role in the success of both the City Centre North development scheme and Commercial Road as a retail destination. The gateway should look to use active frontages to blend commercial use into the City Centre North scheme and create a welcoming and accessible space for both residents of city Centre North and the wider area.

City Centre Commercial Area

4.109 The cultural and leisure destination of the City Centre Commercial area is focused on the key retail and commercial streets of Commercial Road and Arundel Street, as well as the Cascades Shopping centre. This area forms the Core Commercial Area of the City Centre allocation. Proposed uses, should include retail, commercial, leisure, and culture and service use as set out in Policy PLP28 Town Centres. Within the City Centre Commercial area proposals for non-town centre uses will need to be carefully considered to ensure they do not create adverse impacts upon the commercial role of the centre. Proposals should protect and incorporate the existing mature trees on Commercial Road which are being considered for future protection by TPO. Within much of this area non

town centre uses may be acceptable at above ground floor level only; Policy PLP28: Town Centres sets out the detailed requirements related to town centre use. The role of the centre is anticipated to change over the plan period as retail continues to move away from the traditional large national High Street retailers it is expected that the centre will have an increased independent retailer and food and drink offer. The proposal for significant levels of new residential development in the wider City Centre will support these types of business which in turn will support the culture and leisure offer of the centre. Proposals for these types of users in the centre will be supported. Proposals will also be supported for businesses creating additional active frontage and using the street for outdoor seating, where they accommodate the markets and other on street events.

4.110 Within this Area there are limited opportunities for large scale redevelopment due to a larger number of landowners and occupiers. The main exception to this is the site currently occupied by the Tesco superstore and NCP car park. This site has potential to deliver additional residential development in conjunction with a re-provided supermarket. There is opportunity to encourage a shift to sustainable transport modes in the City Centre through a reduction in the overall parking provision and improving the connectivity of the site to Commercial Road and Arundel Street, and to improve pedestrian linkage between the City centre and the adjoining Landport residential Area.

4.111 Within the City Centre Commercial Area there are two listed buildings namely St Agatha's and All Saints Churches. Proposals for redevelopment within this area must retain these buildings and respond sympathetically to their settings. The southern portion of the area borders the Guildhall & Victoria Park Conservation Area and proposals on adjoining sites should respond sympathetically to the park and the Cathedral.

4.112 Within the City Centre Commercial Area space will need to be set aside to accommodate the ongoing provision of the market. The Commercial Road Market currently runs every week on Thursdays, Fridays and Saturdays.

Arundel Street Fountain Focal Point

4.113 The fountain at the junction of Arundel Street and Commercial Road will be the focus of streetscene improvements. Interventions should protect and enhance the fountain and take opportunities to utilise the space for cultural events.

Station Road Regeneration Area

4.114 This Area of the City Centre has seen extensive redevelopment in recent years with more development proposed. The Area forms the setting of one of the main entrances to the City at Portsmouth and Southsea Station and links the commercial centre around Commercial Road to the City's main cultural offer around the Guildhall Square. The area was formerly characterised by mid twentieth century commercial uses of a moderate height with the exception of the former Zurich Building (now Catherine House) and the former Post Office Sorting Office. The Area has seen significant tall building construction in recent years, with Catherine House, Stanhope House, Crown Place and the Travel Lodge having all significantly increased building heights and densities in this area of the City Centre. In addition to the schemes that have already been developed significant further construction at height is proposed within this area of the City Centre including: Land adjacent to Catherine House (17/01807/FUL), at 19 storeys providing 147 dwellings and a 222 bed hotel; Debenhams site (subject to pre app) (partly in the City centre Commercial Area) for 523 units; The former Slindon Street Post Office

(20/00407/OUT) 19 Storeys providing 176 dwellings; Matalan subject to pre app for 615 dwellings over three towers.

4.115 This area of the City Centre has significant potential to deliver mixed use development at density and height including a large quantum of residential development. Proposed buildings of height and density should consider the setting of Portsmouth and Southsea Station (Grade II listed), the Cenotaph (Grade II* Llisted, and Victoria Park Grade II listed). Advantage should be taken of the space created by the railway line to incorporate taller buildings. Proposals for development fronting Commercial Road Adjacent to Portsmouth and Southsea Station should have active ground floor frontage comprising town centre uses. This is intended to improve connection between Commercial Road and Guildhall Square connecting the two areas of the city.

Portsmouth and Southsea Train Station focal point

4.116 This area is key for the implementation of sustainable transport measures and promoting modal shift in the City Centre. The area in front of the Station has the potential to act as a significant gateway to the City, and proposals that enhance the setting of the station and improve the street scene / landscaping of the area will be welcomed. The Station building is listed, however, its quality has been impacted by later additions and poor maintenance, leading to it feeling unkept and unwelcoming. Enhancements to the Station building in order to improve its role as a gateway, and its legibility, permeability and accessibility for users will be encouraged. Commercial uses in the Station will be supported.

Guildhall Quarter

4.117 The southern portion of the City is the focus for cultural and civic offer of the City. In addition to the Guildhall itself, the Area includes the Civic Offices Central Library, New Theatre Royal, Law courts and numerous Portsmouth University buildings. The area includes a significant portion of the Portsmouth University Campus including both teaching buildings and student accommodation. This area of the City Centre is the focal point of its cultural and leisure offer.

4.118 Guildhall Walk connects to the southern side of Guildhall Square and as well as being the home of the New Theatre Royal forms a throughfare of cultural and entertainment uses and the supporting and complementary uses in the form of pubs and restaurants and cafes. Guildhall walk is well used by the wider population of the City most notably the student population and is one of the City's main cultural and evening economy destinations. Policy PLP28: Town Centres seeks to support opportunities to enhance and grow this part of the City's economy.

4.119 To the north west of the Guildhall and university campus lie Victoria Park and the City's Roman Catholic Cathedral. The Registered Park (grade II listed) is an important green space with a large number of mature trees, and historic monuments and features. It lies within the Guildhall & Victoria Park Conservation Area The park is protected by conservation area no 18 'Victoria Park'. The park is well loved, and used by the public, and is the only large area of public open space currently in this part of the city.

4.120 This area of the City is characterised by mid-rise development. The overall quality of the buildings is mixed although there are a number of buildings of high value with much of the area protected by conservation area status. Not every building is of a high quality

and there are areas of ground level paved parking within the area which do little to add to its setting. Proposals for development / redevelopment within this area of the City Centre should respect the character and setting of the Guildhall & Victoria Park Conservation Area (no.18) and aim to raise the overall quality of the townscape of the area through careful use of high quality materials reflecting the finer architectural examples around Guildhall Square and Guildhall Walk. Proposals for mid-rise development of a scale similar to the those in the vicinity should be sympathetic. Proposals will need to take account of the settings of heritage assets, which include among others Victoria Park (Grade II), the Grade II* Cenotaph and listed buildings along Guildhall Walk including the New Theatre Royal (Grade II*). These and other assets make an invaluable contribution to the character of the area and their heritage significance needs to be protected and better revealed through sensitive design.”

Guildhall Square - Focal Point

- 4.121 Guildhall Square is one of the most important and recognisable public spaces in the City Centre. It is already an attractive and well used space with a programme of events and is used as a setting for formal occasions by the University, City Council and the Royal Navy. The square also provides a strong civic function as well as adjoining key cultural and entertainment venues including the Guildhall and the Central Library.
- 4.122 The Square is also at the junction of key pedestrian routes through the City Centre particularly the north / south route from Commercial Road past the Station and into Guildhall Walk. The square is busy with a through-flow of people, particularly during the day and thought should be given to community safety after dark.
- 4.123 The Civic Offices are showing their age and do not meet modern standards for energy efficiency. In addition following COVID and the rise in working from home the offices are occupied to a lesser degree than previously. Any proposals for the redevelopment on the Civic Offices should provide an enhanced level of active frontage onto the Square to make more use of it as a space when not being used for events.
- 4.124 The Guildhall, Guildhall Square and Guildhall Walk should act as a focal point for cultural and civic activities and create enhanced connectivity between Commercial Road and Portsmouth and Southsea Station to the North and Guildhall Walk and the University to the south.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--|---|--|--|--|
| 4,158 homes | 1,721 dwellings to 2030, 2,437 dwellings between 2030 and 2040. | Through the development Management process; working in partnership with developers and land owners | Housing number and Employment floorspace monitoring in the AMR | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and |
| Commercial floorspace 1,546 m² | 2030-2040 years | Through the development | Housing number and Employment | |

| | | | | |
|--|-----------|--|--|-----------------------|
| (20,000 m² Gross) office | | Management process; working in partnership with developers and land owners | floorspace monitoring in the AMR | propose interventions |
| Provision of supporting infrastructure including but not limited to street scene improvements, new open space at City Centre North and improved provision for the market | 2020-2040 | Through the development Management process; working in partnership with developers and land owners | Infrastructure Delivery monitoring in the AMR in line with the requirements set out in the IDP | |

**Table 4.5: Monitoring and Delivery Framework for Portsmouth City Centre
Fratton Park & the Pompey Centre**

Introduction

- 4.125 Fratton Park has been the home of Portsmouth Football Club (PFC) since 1899; its setting in the heart of the City and its historic structure means the site and its activities play an important cultural role in the City's identity. There has been a long and varied history to the redevelopment of Fratton Park and the surrounding land. The football club has explored numerous options to increase the capacity of the stadium, including the possibility of relocating to another part of the City.
- 4.126 The Council believes the accessibility in terms of the proximity to Fratton Railway Station with frequent train services to a variety of destinations, good bus routes and the number of residential units within walking and cycling distance of Fratton Park means that it remains the most sustainable location for a football stadium.
- 4.127 PFC has expressed aspirations to expand its seating capacity with a redeveloped North Stand being the preferred option. The stadium has a current capacity of 21,000, however a future expansion will seek to increase this to between 26,000 and 30,000 utilising the ancillary car park adjacent to the north of the stadium.
- 4.128 To the north of the stadium beyond the ancillary car park are several light industrial units which bound the southern side of Rodney Road. Several of these units are under the ownership of PFC. Residential dwellings located along Alverstone Road and Carisbrooke Road/Frogmore Road bound the east and south of the stadium.
- 4.129 An application (A*37086/AA) for the expansion of Fratton Park and wider development was approved in 2001, demonstrating the feasibility of future redevelopment. This proposed a 35,000 all seater stadium with supporting facilities including office/industrial/warehousing units; non-food retail; restaurants and associated vehicle parking.

- 4.130 The expansion of Fratton Park will seek to further increase the stadium's capacity and secure the long-term future of Fratton Park as the home of PFC. Regeneration of the stadium along with improvements to the public realm, accessibility and environmental quality would greatly improve the visitor experience of a key City landmark. Fratton Park will remain a presence at the heart of Portsmouth and its cultural identity will be secured.
- 4.131 As part of the redevelopment of the area, the property in the Club's ownership on the southern side of Rodney Road could also potentially support a mixed use residential-led development.
- 4.132 Associated uses facilitated by the expansion of the stadium could include small scale commercial, business or service such as conference and event facilities to allow growth of business on non-match days.
- 4.133 The Pompey Centre is a modern purpose built scheme developed in 2003 on 24.1 acres. It is located to the south-west, west and north-west of Fratton Park beyond Tesco which was developed following approval of planning application 14/00128/FUL in 2014. The Pompey Centre is an area of warehouse-style retail and trade outlets, including some large superstore units, fast food outlets, a hotel, leisure facilities, medical centre and residential units fronting Goldsmith Avenue and Fratton Way. Planning permission was granted in 2022 to subdivide Unit 4 (B&Q) to provide three new retail units. There is extensive surface car parking, much of which is currently underutilised. To better optimise the use of land, this area offers a great opportunity to deliver a high quality residential led mixed use scheme that will act as a gateway into Fratton Way.
- 4.134 The existing road layout and location of the railway line prevent easy pedestrian movement and cycle movements to and throughout the site. The locality is dominated by a car-based layout and vehicular movements. The road network, which is a popular east to west travel corridor is often highly congested along Goldsmith Avenue and Fratton Way. At rush hour and on match days this is exacerbated further and puts pedestrians at risk, especially those walking to the stadium. This in turn leaves a bland, unintuitive public realm for pedestrians with no notable green space or features.
- 4.135 Figure 4.6 is a map of Fratton Park and the Pompey Centre and shows an indicative off road pedestrian and cycle route through the site that connects the western and eastern extent and allows safe access for visitors using the train. This route will provide links to both the Pompey Centre and Fratton Park and deliver wider public realm improvements.

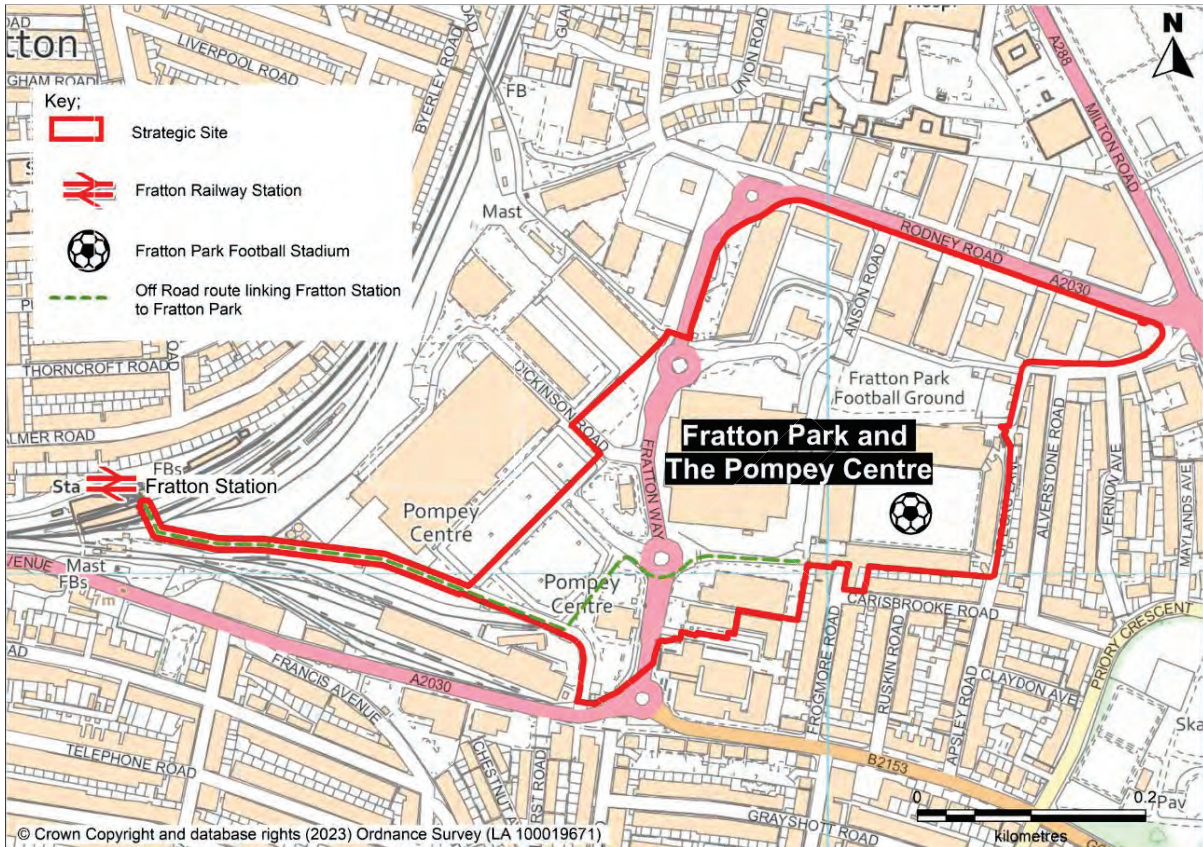


Figure 4.6: Map of Fratton Park and the Pompey Centre

Vision

4.136 In 2040, Fratton Park and the Pompey Centre will be a revitalised locality and a cultural hub. Fratton Park will remain the home of Portsmouth Football Club. A club run by its community, for its community. The football club will host games in a well-designed, expanded stadium. New homes and new jobs will encourage a thriving economy and new safe and accessible green links throughout the site will hand the area back to pedestrians.



Strategic Site Allocation Policy PLP7: Fratton Park & the Pompey Centre

1. Fratton Park and the Pompey Centre, is allocated for the mixed-use development of the following uses:

- a) Expansion to the north stand of Fratton Park Football Stadium to increase the capacity from 21,000 to between 26,000 and 30,000;
- b) Approximately 710 residential dwellings with ground floor active uses;
- c) Supporting hotel (approximately 145 rooms);
- d) Mixed conference and event facilities.

2. An appropriate, accessible off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park shall be provided with wider public realm improvements. Development will be expected to integrate with this route.
3. Development must incorporate active frontages and entrances that promote activity and successfully engage with the public realm particularly along the off-road pedestrian and cycle route and in other appropriate locations.
4. Whilst the City Council wishes to see a comprehensive development of the site, it recognises that planning applications may come forward separately or in phases. It is important that the planning of the sites is co-ordinated. Therefore, developers will be expected to demonstrate how their proposals for a particular part of the site fits into the overall vision of the area, other permissions granted and emerging proposals. Planning applications will need to demonstrate potential landscaping or other solutions for land comprising later phases in the event that such phases do not come forward within an agreed timeframe.
5. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:
 - a) The design, height and density of development should integrate with and complement the existing context and character of the site and be developed in accordance with other policies within this plan;
 - b) Effective access arrangements that are safe and suitable for all users;
 - c) Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan;
 - d) A Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures and identify opportunities to implement effective sustainable transport initiatives;
 - e) The provision of Sustainable Drainage Systems (SuDS) in order to mitigate the risk of surface water flooding; and
 - f) A network of interconnecting green and public access corridors throughout the site will be delivered to enhance the level of green infrastructure and encourage net gains in biodiversity.

Supporting text

- 4.137 The purpose of this policy is to allocate land for the expansion and improvement of Fratton Park and to regenerate the wider area in order to greatly improve the local and visitor experience.
- 4.138 The poor pedestrian infrastructure and the busy nature of the local road network pose a risk to the safety of all pedestrians including locals, visitors and football supporters, especially on match days. Appropriate pedestrian and cycle access improvements should be delivered across the site as part of the overall public realm enhancement. The

delivery of an off road, safe pedestrian access route from Fratton Station to the Pompey Centre and Fratton Park will avoid the main road network and allow visitors to safely access the site without needing to use pavements adjacent to busy roads. This route is important in the delivery of this strategic site to ensure a safe environment for all and enhance pedestrian experience.

- 4.139 Development throughout the site should be designed to provide well defined entrances, active frontages and edges, taking advantage of opportunities for natural surveillance. This will ensure integration with and maximise the advantages of a new pedestrian link to the station and encourage residents and visitors to cycle and walk through the development.
- 4.140 Due to the various land ownerships within the strategic site, it is understood that development proposals may come forward independently of one another. This must not lead to the delivery of development within the strategic site that distinctly differs to other developments that may have come forward prior; or existing neighbouring built form. Effective collaboration between landowners must be evidenced to show how a holistic approach has been reached.
- 4.141 Applications should demonstrate through a robust design and access statement how development complies with a design code, which should be produced in collaboration with the Local Planning Authority and the local community. It is important that the new development complements and responds to the existing built form and enhances the historic and cultural identity of this locality. Careful consideration should therefore be given to design including but not restricted to building height, mass, density and materials.
- 4.142 To further improve safety for existing and future residents, detailed plans must be provided that show how safe access and egress will be implemented for all modes of transport. All Travel Plans and Transport Assessments for the site should comply with Policy PLP47 (Movement and Transport) of the Local Plan, the Local Transport Plan 4 (2021 –2038) Portsmouth's Parking Standards and Transport Assessment SPD the Local Cycling and Walking Infrastructure Plan and any successor documents.
- 4.143 Any new access or highways arrangements for the site should be informed by the Strategic Transport Assessment and agreed in writing with the Local Planning Authority, the Local Highway Authority and National Highways. It is important that non-motorised access is both protected and enhanced as part of any new access proposals. Parking arrangements must be delivered in accordance with the Parking Standards SPD and any successor documents.
- 4.144 The site as existing comprises a significant amount of hard landscaping and poor quality public realm, including a large amount of bland surface parking. The redevelopment of this area allows an opportunity to deliver green infrastructure and high quality public realm across the site. The route from the station to Fratton Park and the surrounding developments must incorporate an appropriate level of greening to create an attractive alternative to driving.
- 4.145 The provision of green infrastructure can also help deliver SuDS. This strategic site presents an opportunity to significantly reduce surface water run off by implementing appropriate levels of SuDS in accordance with Policy PLP32 of the Local Plan.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|---|--|--|--|--|
| Expansion to the north stand of Fratton Park Football Stadium to increase the capacity from 21,000 to between 26,000 and 30,000 | 2035 - 2040 | Through the development Management process; working in partnership with developers and land owners | Infrastructure monitoring in the AMR | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |
| Off road pedestrian and cycle route | Prior to occupation of homes and opening of Fratton Park expansion | Through the development Management process; working in partnership with developers and land owners | Infrastructure monitoring in the AMR | |
| 460 residential dwellings | 2030 - 2040 | Through the development Management process; working in partnership with developers and land owners | Residential and employment monitoring within the AMR | |
| 250 residential dwellings | 2035 - 2040 | Through the development Management process; working in partnership with developers and land owners | Residential and employment monitoring within the AMR | |
| Supporting Hotel and mixed conference and event facilities | Open for business when the Fratton Park Stadium expansion opens | Through the development Management process; working in partnership with developers and land owners | Employment monitoring within the AMR | |
| Small scale ground floor commercial/retail units | Open for business when the first homes and | Through the development Management process; working | Residential and employment monitoring | |

| | | | | |
|--|--------------------------------|--|----------------|--|
| | business premises are occupied | in partnership with developers and land owners | within the AMR | |
|--|--------------------------------|--|----------------|--|

Table 4.6: Monitoring and Delivery Framework for Fratton Park & the Pompey Centre St James' & Langstone Campus

Introduction

4.146 The St James' and Langstone Campus strategic site is located in Milton, an area on the eastern edge of Portsea Island with a predominantly suburban character. The site itself consists of two main development areas. The first is the Grade II listed St James Hospital and its grounds which occupy the western part of the strategic site and is under multiple ownerships as shown on the map below. These include the developers PJ Livesey, Homes England and Solent NHS Trust. The second main area comprising the eastern part of the site is the former University of Portsmouth Langstone Campus (owned by the University of Portsmouth). A map of the site is shown as figure 4.7.

4.147 St James Hospital comprises a Byzantine Gothic hospital complex set in a wider parkland setting. The grounds of the hospital contain a number of ancillary buildings associated with the former mental hospital and medical use. Of particular note is the chapel designed by George Rake in the early English style. The hospital and the chapel both date to 1879 and are listed as Grade II. These buildings along with the surrounding landscape including mature trees, open spaces and vistas are the key contextual features for development to protect and respond to.

4.148 The main Grade II hospital building and some of its grounds are locally distinctive within the wider setting of Portsmouth, although they have become surplus to requirements. An application for redevelopment comprising 209 dwellings on the extent of land owned by PJ Livesey (formerly NHS Property Services) was granted planning permission in August 2023 following an appeal. The location of the development was considered sustainable by the inspector at appeal who stated that occupiers of the proposed development are unlikely to be dependent on the use of the car as the site is highly accessible to everyday shops and services by other transport means. The inspector also found that there would be no harm to highway safety in accordance with the Development Plan and the NPPF. Redevelopment of the whole site was modelled as part of the PCC Strategic Transport Assessment which demonstrates that the whole site will not have any cumulative severe impacts to road network, subject to identified network improvements.

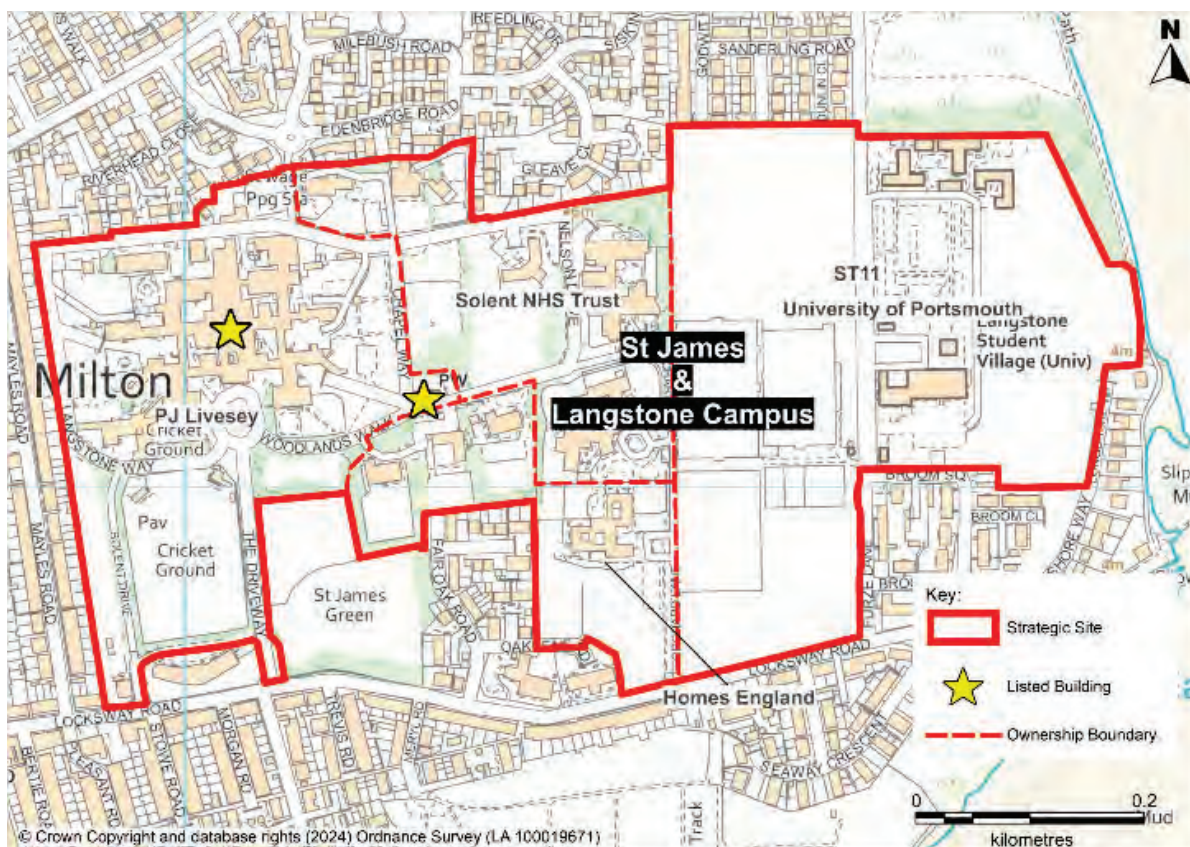


Figure 4.7: Map of St James' and Langstone Campus

4.149 To the southeast of the main hospital, beyond the chapel is a plot under the ownership of Homes England which is also available for redevelopment. This plot is occupied by the former Harbour School, various other buildings, including two curtilage listed villas, and areas of open space. This plot is currently under consideration for 107 dwellings (application reference 18/00288/OUT). The land to the north of this plot and to the east of the main hospital, held by Solent NHS Trust is both currently used and is to be retained for any potential future health related development that may be required. This parcel of land includes The Limes and The Orchards hospitals.

4.150 The former University of Portsmouth Langstone Campus occupies the eastern extent of the strategic site, extending to the coast and is within the ownership of the University of Portsmouth. It is sensitive in terms of nature conservation as it is located adjacent to Chichester and Langstone Harbours SPA, Solent Maritime SAC, Chichester and Langstone Harbours Ramsar site and Langstone Harbour Site of Special Scientific Interest (SSSI).

4.151 The former halls of residence were located centrally within this plot, although have since been demolished in the most part. 3/4 storey buildings occupy the northern extent of this brownfield strip with one high rise block remaining towards the south. To the east of this brownfield land adjacent to Langstone harbour is a large grass playing field which is also identified as a 'Core Area'⁷⁶ for Brent Geese and Solent Waders. To the west is a

⁷⁶

<https://hiwvt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647c8ba8bf0f3b8cfb7c1b>

mix of grass and artificial playing pitches which are identified as Secondary Support Areas for Brent Geese and Solent Waders.

4.152 The Milton Common Local Nature Reserve Mitigation and Management Framework (2022)⁷⁷ seeks to mitigate any alone impacts caused by resultant recreational pressure from the development. The framework calculates a fee per dwelling that must be paid by the developer to allow improvements to Milton Common in accordance with the framework. This will encourage users here as opposed to the neighbouring SPA and SAC.

4.153 Most of the site is located within flood zone 1, although a small section of the site along the eastern coastline is located within flood zones 2 and 3. A sequential approach to development should be taken within the site. Portsea Island is covered by the North Solent Shoreline Management Plan (SMP) (section 5aPI01 and 5aPI02). The Portsea Island Coastal Strategy Study (PICSS) was developed to build on policies set out in the North Solent SMP. These plans and strategies provide recommendations for flood management measures to protect residents of Portsmouth from flooding. Further information can be found within the Portsmouth SFRA Level 2.

4.154 Despite the strategic site comprising two distinctively separate parcels of land; where feasible, efforts should be made to connect the two sites via walking and cycling routes to offer easy access for local residents across the entire site. This will allow access to shared open spaces, the coastline and any other facilities.

4.155 The St James' and Langstone Campus site falls within the Milton Neighbourhood Plan area. Further detailed policy guidance for the site can be found in the adopted Milton Neighbourhood Plan.

Vision

4.156 In 2040, St James and Langstone Campus will be home to a new healthy and happy community on the edge of Langstone Harbour. The site's rich cultural heritage and green spaces will be enjoyed by both residents and visitors.



Strategic Site Allocation Policy PLP8: St James' & Langstone Campus

1. St James & Langston Campus, as shown on the Policies Map, is allocated for the development of the following uses:

- a) Approximately 417 dwellings including potential elderly person and sheltered accommodation;**
- b) Healthcare facilities;**
- c) Education facilities;**
- d) Recreation, sports and other community facilities.**

⁷⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2023/12/Milton-Common-LNR-framework-aa-accessible.pdf>

2. Development proposals for the above named at uses will be permitted on the St James' part of the site provided that they meet all of the following site-specific and overarching development requirements:

- a) Retain, and conserve the significance and setting of St James's Hospital (Grade II listed), and the Chapel (Grade II listed), and all other heritage assets in the hospital grounds;**
- b) All proposed developments must be accompanied by a heritage statement;**
- c) The design and layout must conserve, or enhance and appropriately integrate into the locally distinct parkland landscape setting and open character of the site;**
- d) An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site;**
- e) Integrate the following open spaces into new development to ensure public access is retained: The St James's Hospital Cricket Pitch, The Dog Park, land to the north west of the listed chapel and land to the east and west of Chapel Way;**
- f) Provides safe, permeable and convenient north-south pedestrian and cycle links from Locksway Road to Longfield Road and across the wider site; and**
- g) Provides off site highway network improvements including the junction improvements at Locksway Road / Milton Road and Milton Road / Goldsmith Avenue to improve traffic flow and reduce any highway safety concerns.**

3. Development proposals for the above named at uses will be permitted on the Langstone Campus part of the site provided that they meet all of the following site-specific and overarching development requirements:

- a) A Landscape and Visual impact assessment should be submitted to ensure there is no adverse impact on the coastal landscape and views into the site or out over Chichester and Langstone Harbour from the site;**
- b) Development must retain, where possible, playing pitches and fields;**
- c) Public access must be retained and enhanced to key open spaces and playing fields across the site;**
- d) The north-south bus/cycleway connection along Furze Lane is retained and enhanced; and**
- e) Safe, accessible off-road walking and cycling routes through the site are provided, linking areas to the north and south.**

4. Development proposals for the above named uses will be permitted provided that they meet all of the following site-specific development requirements:

- a) **Provision of appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA, Solent Maritime SAC and any other nationally or locally designated habitat sites including supporting habitats;**
- b) **Proposals should meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked (Core Area P23B, Secondary Support Area P25) to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity;**
- c) **Flood management measures should be incorporated within the site in accordance with the SFRA Level 1 and 2 to reduce the risk to more vulnerable development and key infrastructure now and in the future;**
- d) **Proposals for surface water management should make provision for storage during high tide events, when the surface water drainage may be subject to tide locking;**
- e) **The provision of a Sustainable Drainage System (SuDS) to mitigate the risk of surface water flooding;**
- f) **A Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures and identify opportunities to implement effective sustainable transport initiatives;**
- g) **Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan;**
- h) **Provide pedestrian and cycle links throughout the site to allow safe and convenient movements across the full extent and to wider parts of the City.**

Supporting text

4.157 The purpose of this policy is to deliver high-quality development across the whole strategic sites taking into consideration its constraints and opportunities. This policy seeks to avoid fragmented development of a site that is under multiple ownerships. Instead, it seeks to deliver development that responds positively to the historic significance, local character, high quality landscape setting and important habitats.

4.158 The St James part of the strategic site is allocated for 297 residential dwellings with the University of Portsmouth owned part allocated for 120 residential dwellings. Education, recreation and community facilities will be delivered across the site.

St James

4.159 The strategic site contains two listed buildings, the hospital and the chapel, buildings of historic importance and other heritage assets. The hospital is a good example of a late Victorian asylum, with an impressive principal elevation, symmetrical plan form, communal hall, external airing courts and chapel set within a wider expansive landscape. It survives largely intact, though it has been much extended in the latter part of the twentieth century. Proposals should minimise harm to the architectural and historic interest of the building and allow the primacy of the main building to be retained. Proposals are encouraged to enable the building's heritage significance to be better revealed and appreciated. The chapel is little altered externally with some limited twentieth century alterations to the interior. It is of special architectural interest, much of which is seen in the exterior of the building. In addition to these listed buildings are other buildings of historic importance and other heritage assets, including the hospital grounds themselves (which are included on the Hampshire Gardens Trust Register and thus considered a non-designated heritage asset). Therefore, to ensure any development conserves or enhances these, a heritage statement must be prepared and submitted. This must assess and understand the significance of any assets and ensure that any subsequent design proposals carefully and sympathetically respond to the presence and significance of the assets.

4.160 The parkland landscape and character of the site is unique within Portsmouth and therefore, development must respond sensitively to the surrounding context in which it is located. A Design and Access Statement must be submitted which sets out how the development will sympathetically respond to, and integrate with the landscape, existing built form and heritage assets to ensure the areas distinctive character is conserved.

4.161 The hospital grounds contain a large number of mature trees and planting. Proposed development should retain and incorporate existing trees protected by Tree Protection Orders (TPOs) including TPO177 and TPO215. An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan must be submitted as part of any application to ensure protection of important trees on site and set out any future management plans.

4.162 The hospital grounds currently contain a number of open spaces used informally by the local community for walking and recreation. As part of any proposed scheme, public access is to be retained and enhanced. This includes access to the existing listed Chapel and retention of the of Cricket Pitch as a public facility.

4.163 Informal pedestrian and cycle access through the site from Locksway Road to Longfield Road is enjoyed by the public is long established and this should be retained and enhanced as part of any development scheme. Public realm improvements should deliver inclusive active walking and cycling routes.

Langstone

4.164 The location of this strategic site offers the potential to deliver a residential-led scheme of the highest quality. Views out over Chichester and Langstone Harbour should be

enhanced and should be achievable throughout the site. Views from the coastline towards the site should be carefully considered to ensure the experience of people walking along the coastline is not diminished when looking inland. A Landscape and Visual impact Assessment should demonstrate how these views have been taken into consideration and incorporated throughout the development.

- 4.165 The playing fields which bound the eastern and western boundary of the former halls of residence at Langstone are used by both the University and several local sports clubs. It is important therefore that as part of any development, an appropriate level of open space is retained and enhanced to allow their continued use by the local community.
- 4.166 The Langstone Campus currently benefits from a north-south bus and cycle route (along Furze Lane) which runs between the University buildings and the western playing fields linking Locksway Road and Moorings Way. Development proposals for the Langstone Campus site would be expected to retain and enhance this link as part of any redevelopment for buses and cyclists. Further sustainable routes should be created linking to surrounding footpaths and cycle routes, providing a safe, attractive, permeable and convenient environment for both pedestrians and cyclists.
- 4.167 The central brownfield strip of land that was previously occupied by student halls of residence is the preferred location for future development. If robust viability assessments shows the need to extend the development boundary, this should be westward to avoid the flood zone and core area for Brent Geese. Reprovision of open space should be provided across the site where development results in a significant loss of existing open space.

Overarching development requirements

- 4.168 Measures must be taken to ensure that any direct recreational impact on nationally designated sites and supporting habitat is alleviated. The site contains Core and Secondary support areas for Brent Geese and is located in close proximity to several others. The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity. Proposals will need to be determined in line with Policy PLP42 of this Local Plan and the Guidance on Mitigation and Off-setting Requirements. These include the Solent Waders and Brent Goose Strategy 2020, Milton Common Local Nature Reserve Mitigation and Management Framework 2022 and any subsequent guidance documents. Mitigation must also be to the satisfaction of the Local Planning Authority and Natural England.
- 4.169 It is estimated that in 2122 much of the eastern extent of site will be in flood zones 2 and 3a. A sequential approach to land use planning should therefore be applied within the site. The most vulnerable aspects of development should be steered towards the areas at lowest risk. A site-specific flood risk assessment should incorporate recommendations set out within both the SFRA Level 1 and 2 to demonstrate how flood risk will be managed to ensure that the development is safe over its lifetime. This may

include appropriate land raising and any other measures to protect more vulnerable land uses, key infrastructure and safe access and escape routes.

- 4.170 New development should discharge surface water runoff to the sea following suitable treatment. Storage of surface water should be managed when the sea level rises to a height that will not allow for drainage.
- 4.171 A site specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan;
- 4.172 This site presents an opportunity to provide significant net reduction in surface water run-off given the level of greenfield land on site. Details of suitable sustainable drainage systems that mitigate the risk of flooding must be agreed in advance with both the Local Planning Authority and the Lead Local Flood Authority. Surface water run off must be in accordance with Policy PLP32 of this Local Plan.
- 4.173 To further improve safety for future residents, detailed plans must be provided that show how safe access and egress will be implemented for all modes of transport. All Travel Plans and Transport Assessments for the site should comply with Policy PLP47: (Movement and Transport) of the Local Plan, the Local Transport Plan 4 (2021 –2038) Portsmouth's Parking Standards and Transport Assessment SPD the Local Cycling and Walking Infrastructure Plan and any successor documents.
- 4.174 Any new access arrangements for the site should be agreed in writing with both the Local Planning Authority and the Local Highway Authority. It is important that non-motorised access is both protected and enhanced as part of any new access proposals.
- 4.175 Parking arrangements must be delivered in accordance with the Parking Standards SPD and any successor documents.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--------------------------------|-------------|--|---------------------------------------|--|
| 209 residential dwellings | 2025 - 2030 | Through the development Management process; working in partnership with developers and land owners | Residential monitoring within the AMR | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |
| 88 residential dwellings | 2025 - 2030 | Through the development Management process; working in partnership with developers and land owners | Residential monitoring within the AMR | |
| 120 residential dwellings | 2030 - 2035 | Through the development | Residential monitoring | |

| | | | | |
|--|--|--|----------------|--|
| | | Management process; working in partnership with developers and land owners | within the AMR | |
|--|--|--|----------------|--|

Table 4.7: Monitoring and Delivery Framework for St James' & Langstone Campus Horsea Island Open Space

Introduction

4.176 Horsea Island was an island located off the northern shore of Portsmouth Harbour. It has been gradually subsumed by reclamation and is now connected to the mainland. In the early 1970s, the eastern tidal mudflats of Paulsgrove Lake between Horsea Island and the mainland at Paulsgrove to the north were reclaimed, with much of the area destined to become a landfill site, the remainder to form the Port Solent leisure complex. In 1998 planning permission (A829932/AM) was granted for the recontouring and restoration of the former landfill site, in a number of phases as the landfill was closed, with the landfill not permitted to continue operating past 2008. The landfill site closed in 2006 and was allocated in the 2006 Local Plan as a recreational park with woodlands and meadows. A map of the proposed open space forms figure 4.8.



Figure 4.8: Horsea Island Open Space

4.177 The City Council and Veolia who hold the integrated waste management contract with the Council are currently carrying out an assessment to determine the exact extent of protections needed. Proposals will need to take account of this study.

4.178 The site is subject to remediation as permitted by application A*29932/AM, which required the provision of the Landscape Masterplan. This was submitted and set out the proposed approach for the site including the following mix for habitat types: woodland planting; amenity grassland; wildflower meadow and meadow areas with Gorse. In addition, areas of existing vegetation were to be retained. A map from the Landscape Masterplan forms figure 4.9.

4.179 The Masterplan also detailed proposed arrangements for public access including provision of a car park adjacent to the Household Waste Recycling Centre now permitted (17/O1191/FUL), a park road, cycleway and footpath network. It is anticipated that some of the proposals as set out in the Landscape Masterplan may have to be adapted to take account of the latest information related to the MoD's exclusion zone, updated environmental information and results of the work currently being undertaken in regard to retained gas infrastructure.



Figure 4.9: Permitted landscape masterplan for the eastern part of Horsea Island.

4.180 This policy is concerned with the former landfill site and its redevelopment and reuse for public open space. The southeastern portion of Horsea Island is covered by policy

PLP3: Tipner West and Horsea Island East, whilst Port Solent is allocated under policy PLP11.

4.181 The proposed Strategic Open Space is bordered to the south by the MoD Defence Diving School, to the west by Paulsgrove Lake, to the North and East by Port Solent and the M275 motorway and to the south east by the Horsea Island East site. The Strategic Site includes all of the Former Landfill including the land to the South of Marina Keep; The Household Waste Recycling Centre is being retained in its current use and is excluded from the site.

4.182 As discussed in the Development Strategy chapter of this Local Plan, the wider Tipner-Horsea Island area is one of the two principal sites identified in the Southampton and Portsmouth City Deal. The City Deal sought funding by bringing together the development sites at Tipner West and East, Horsea Island East and Port Solent in a unified strategy. The development of Horsea Island as an open space with improved public transport connectivity in the form of a new busway was integral to the City Deal approach, linking Port Solent and Horsea Island East. The Horsea Island Open Space will help to serve the open space requirements of the residents of Tipner West and will be accessed directly from Tipner via a proposed new bridge linking Horsea Island East and Tipner West. A map of the site forms figure 4.9.

Vision

4.183 In 2040, Horsea Island will host a large public open space as part of a green gateway for the City. It will be home to a wide range of plant and animal species alongside the adjoining protected Portsmouth Harbour. It will provide a significant new habitat for wildlife with many newly planted trees. The new open space will be used by the new residents of Tipner as well as residents of the wider City and visitors and provide significant green space on the doorstep of the existing communities at Port Solent and Paulsgrove. Horsea Island will provide a significant space for recreation and leisure which will benefit the health and well-being of the residents. The Space will create and enhance significant views to and from Portsdown Hill, Porchester Castle and the Dockyard. It will balance the need for public access to open space with safe use of the former landfill. New and improved public transport, walking and cycling connections, including the segregated busway / cycle and pedestrian link, will enable people to make fewer journeys by car to and from Horsea Island, and improve sustainable transport connections between Tipner and Port Solent and improve connectivity in the western part of the city.



Strategic Site Allocation Policy PLP9: Horsea Island Open Space

1. Horsea Island Open Space, as shown on the Policies Map, is allocated for the development of the following uses:

- a) Strategic public open space;**
- b) Improved habitat for wildlife;**
- c) Infrastructure supporting the provision of the strategic open space;**

- d) Infrastructure supporting the ongoing remediation of the former landfill site; and
 - e) Provision of a segregated busway / cycle and pedestrian link between Tipner West and Port Solent, via a new bridge at Horsea Island East.
2. Development proposals for the above-named uses will be permitted provided that they meet all of the following site-specific development requirements:
- a) The new open space provision should consider the needs and safety of the intended users and the need to provide accessible multi- functional spaces;
 - b) The open space provides for a mosaic of habitat that links to and supports the habitat of the neighbouring Portsmouth Harbour Special Protection Area and recognises the role of the site as Core and Primary supporting habitat for waders and Brent Geese;
 - c) To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars⁷⁸. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.' Proposals will need to comply with and Policy PLP 42 of this plan and take account of the guidance set out in and the Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements;
 - d) Proposals will need to be in line with the restrictions imposed by the MoD exclusion zone as shown on figure 4.9 in line with the MoD's guidance on exclusion zones;
 - e) Public access will be restricted from the areas of the site needed to be protected for infrastructure related to the safe extraction of gases from the former landfill, as shown on figure 4.9;
 - f) Proposals will take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern portion of the Strategic Horsea Island Open space as shown in figure 4.9; and

⁷⁸ The western portion of the site and the small southern portion of the site are Core Areas P48A/P48B and P75 protected for Brent Goose and Waders; the eastern portion of the site as shown on figure 4.9 is also a Primary Support area P48C for Brent Goose and Waders.

- g) Allow views to and from the Open Space and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base.**

Supporting text

- 4.184 The purpose of this policy is to allocate a new strategic open space for the City of Portsmouth on the former landfill site of Horsea Island.
- 4.185 The open space should act as a recreational space for the adjoining community at Port Solent, the proposed new community at Tipner and the needs of the wider populace of the City. The space should provide a multifunctional role providing for both the needs of residents and wildlife, with importance placed on being inclusive for residents and visitors of all ages, abilities and socio-economic backgrounds.
- 4.186 This will be subject to ensuring that the open space is safe for future public use. To this end the City Council and Veolia need to be satisfied that measures are in place to secure the safety of the public and protect the infrastructure for methane gas and leachate extraction on Horsea Island Open Space. There is currently a network of well and pipes on site, which are responsible for the removal of the methane for burning at a facility adjoining the Household Waste Recycling Centre. The leachate is removed through a separate pipe network for disposal into the sewerage system. Proposals for the site will need to include provision for the maintenance and monitoring of this equipment and to ensure that it does not pose a risk to the public if tampered with. Due to this some of the equipment may need to be restricted from public access, Consultants are currently undertaking assessment of the site on the behalf of Veolia to determine the potential impact of the retained gas infrastructure on future public access.
- 4.187 Proposals should support the provision of physical infrastructure necessary for the delivery of the Strategic Open Space. These are indicated in the Landscape Masterplan and include the busway, cycle routes, pedestrian paths and a car park accessed from Port Solent.
- 4.188 The open space is in close proximity to the Portsmouth Harbour SPA. This designated due to its populations of for the following species: Dark-bellied brent goose, Red Breasted Merganser, Dunlin and Black-tailed godwit. Proposals should look to connect to and enhance the adjoining SPA/ Ramsar where possible.
- 4.189 The western part of Horsea Island is identified as Core Area P48A / P48B of the Solent Waders and Brent Goose Strategy and the eastern part of the site is identified as Primary Support Area P48C. In addition a small area adjoining the southern part of the site is identified as Core Area P75. Development impacting these areas will require mitigation. in accordance with Policy PLP42: Solent Waders & Brent Geese Sites of this Local Plan and the Guidance on Mitigation and Off-setting Requirements⁷⁹ and to the satisfaction of the local planning authority and Natural England. To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally

⁷⁹ <https://solentwbgs.files.wordpress.com/2021/03/swbgs-mitigation-guidance-oct-2018.pdf>

linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.'

- 4.190 Adjacent to the proposed Strategic Open space on the south western side is the Defence Diving School, which is an MoD run facility. Part of the site is used for munitions storage. There is therefore an exclusion zone around the store which impacts part of the adjoining open space. Within the exclusion zone the MoD is required to be consulted in relation to any planning applications in respect of the following development: to carry out building, mining, or other operations to make any material changes in the use of buildings or other land. It has been confirmed that there are limitations on the numbers of people who can pass through the exclusion zone within any given 24-hour period. It is therefore not possible to have unrestricted public access within this area of the open space. This area of the open space should therefore be considered for uses that do not require public access.
- 4.191 The restrictions associated with the MoD exclusion area limit the route of the bus way proposed through the site. It was initially anticipated that the busway would skirt the former landfill on the southern side. However, due to the presence of the exclusion zone and the limitations it places on the numbers of people who can be present, an alternate route on the northern site is being considered.
- 4.192 The busway was originally proposed in order to support the aspirations in the City Deal. It is envisaged that the bus / cycleway through the Horsea Island strategic space would link the development sites at Port Solent, Horsea Island East and Tipner. It is an integral part of the wider development proposals within this area of the city and provides a key additional sustainable transport link between the City Centre and Port Solent, helping to shorten public transport journey times and enable modal shift.
- 4.193 As a former landfill the proposed Strategic Open space has a pronounced topography, in the form of two main mounds / hills. The site is in proximity to a number of key landmarks in Portsmouth and the surrounding area including Portsdown Hill, Tipner, the Port and Portchester Castle. Proposals on the Strategic open space should consider the impact on these views and take advantage of them to draw visitors to the open space.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--------------------------------|-----------|--|---|--|
| 64ha of Strategic Open Space | Post 2030 | Through partnership working with Veolia to continue to develop the space, to make it ready for public access | Through the AMR in consultation with Veolia | By 2027, if the site is not anticipated to be ready to be opened for public access in 2030 further assessment will be needed by PCC / Veolia to determine the measures |

| | | | | |
|--|--|--|--|-----------------------------|
| | | | | needed to expediate access. |
|--|--|--|--|-----------------------------|

Table 4.8: Monitoring and Delivery Framework for Horsea Island Open Space

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Chapter 5: Site Allocations

Introduction

- 5.1 This chapter allocates a number of important sites, which will deliver multiple benefits for the City particularly new jobs and homes. The quanta of development are set out in table 5.1 and a map showing their locations forms figure 5.1. The policies in this chapter are strategic and any policies relating to these sites in neighbourhood plans should align with these strategic policies. Icons are shown for each site allocation to illustrate which of the strategic objectives of the Local Plan will be achieved there.
- 5.2 All of the allocations are supported by robust evidence most notably the Housing and Economic Land Availability Assessment (HELAA)⁸⁰, which is the Council's main evidence based study on land supply. References to more detailed individual studies are cited in the text including the Strategic Flood Risk Assessment (SFRA) Level 2⁸¹. It should be noted that all the development requirements set in these policies are site specific and requirements set by Citywide policies such as affordable housing are not repeated here. The quantum of development set in these policies are indicative yields only and may be subject to further change through the development management process. The local planning authority will therefore take a flexible approach to the actual quantum of development subject to robust evidence being provided to justify them in forthcoming planning applications.
- 5.3 Flooding is a significant issue in Portsmouth and therefore, the SFRA Level 2 was produced to assess flood risk at strategic and allocated sites. Following the assessment, the recommendations contained within it have been used to inform both site specific policies and the wider strategic policies PLP31 (Flooding) and PLP32 (Sustainable Drainage Systems). It should be noted that all strategic and allocated sites will need to be supported by a robust, site specific flood risk assessment and a sequential approach to land use planning must be applied to each site. The SFRA Level 2 also provides information relating to current and future flood defence projects within Portsmouth. Further details relating to these schemes and their delivery across Portsmouth can be found in the Infrastructure Delivery Plan.
- 5.4 A monitoring and delivery framework is set out at the end of the supporting text for each allocation site. This shows the types and amounts of development associated with the Site Allocation and the anticipated rate of development. Information is also provided on delivery mechanism and triggers where relevant. Chapter 12 (Monitoring) includes targets and indicators for all the allocations, which will be reported on annually in the Authority Monitoring Report. These reflect the monitoring and delivery frameworks within this chapter.

⁸⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/02-PCC_Housing-and-Employment-Land-Availability-Assessment_2023-Report_FINAL-latest-version-for-CDL.pdf

⁸¹ <https://www.portsmouth.gov.uk/newlocalplanevidencedocs>

| Site | Homes | Commercial floorspace (net) | Other benefits |
|---|-------|-----------------------------|--|
| Land West of Portsdown Technology Park | - | 12,500 m ² | Regeneration of a mainly brownfield site in a prominent location |
| Port Solent | 500 | - | Marine uses, improved accessibility, improved sea defences |
| St John's College | 212 | - | Improved connectivity, protected heritage assets |
| Fraser Range | 134 | - | New sea wall |
| The News Centre | 100 | - | Electric bus depot |
| Somers Orchard | 565 | - | Improved connectivity, Over 50% affordable housing |

Table 5.1: Site allocations delivery

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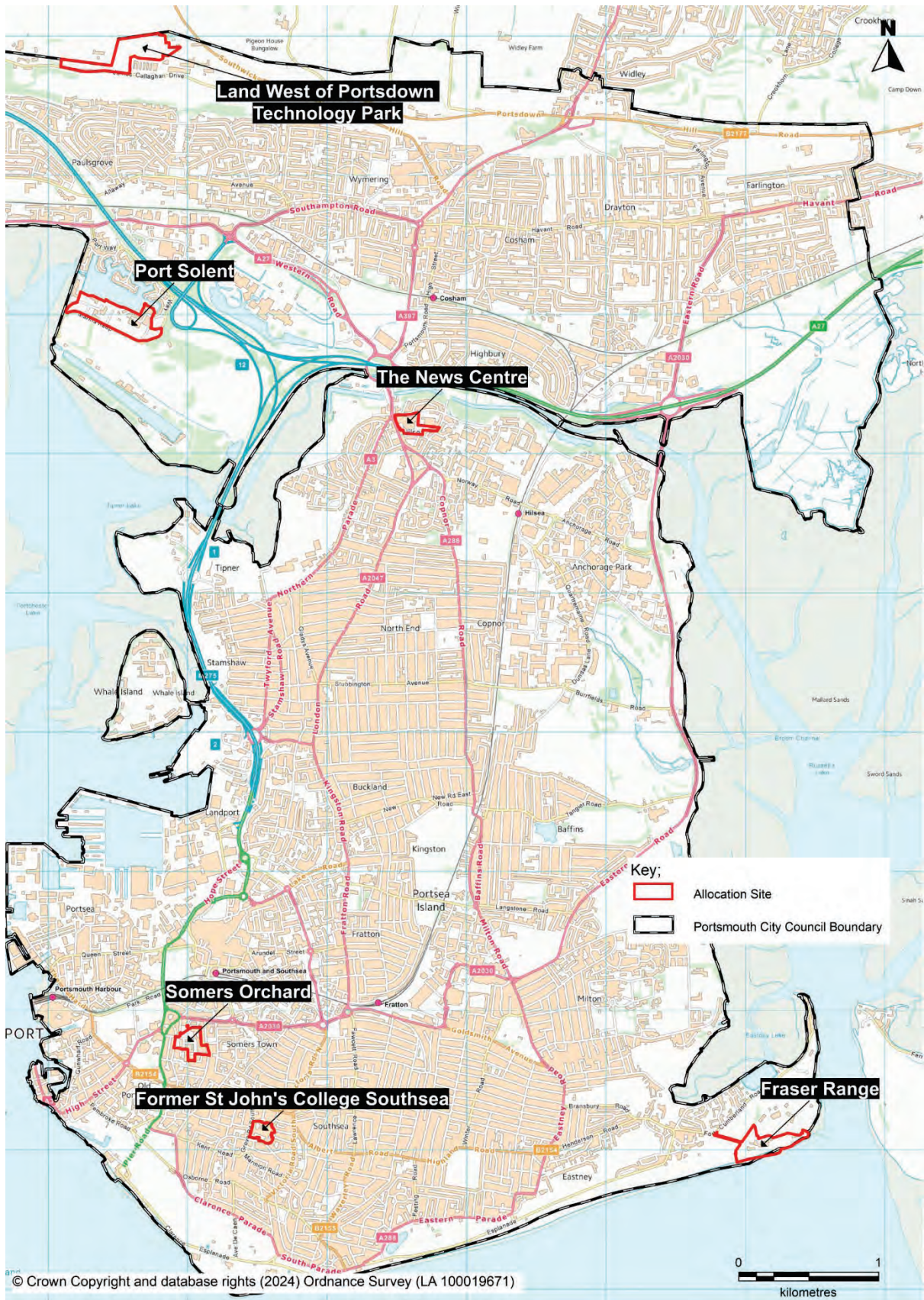


Figure 5.1: Site allocations

Land West of Portsdown Technology Park

Introduction

5.5 Land West of Portsdown Technology Park is a predominantly brownfield site located on the prominent ridge of Portsdown Hill, which is the extensive chalk escarpment to the north of the City. The site forms part of the former Ministry of Defence Portsdown Main site, an art-deco building built in the 1950s, which closed in 1997 and was demolished in 2011. The site is mainly vacant although the footprint of the main building is clearly visible with a few small derelict buildings. There are some temporary, low value uses on site. The majority of the site's former buildings were situated on the southern and western half of the site, broadly on the ridge of the hill, with the north-eastern slopes largely undeveloped and in agricultural use. The location and design of all new buildings will need to be carefully considered in terms of their impact on views in this prominent location. A map of the site is shown as figure 5.2 and shows the City boundary running through it.

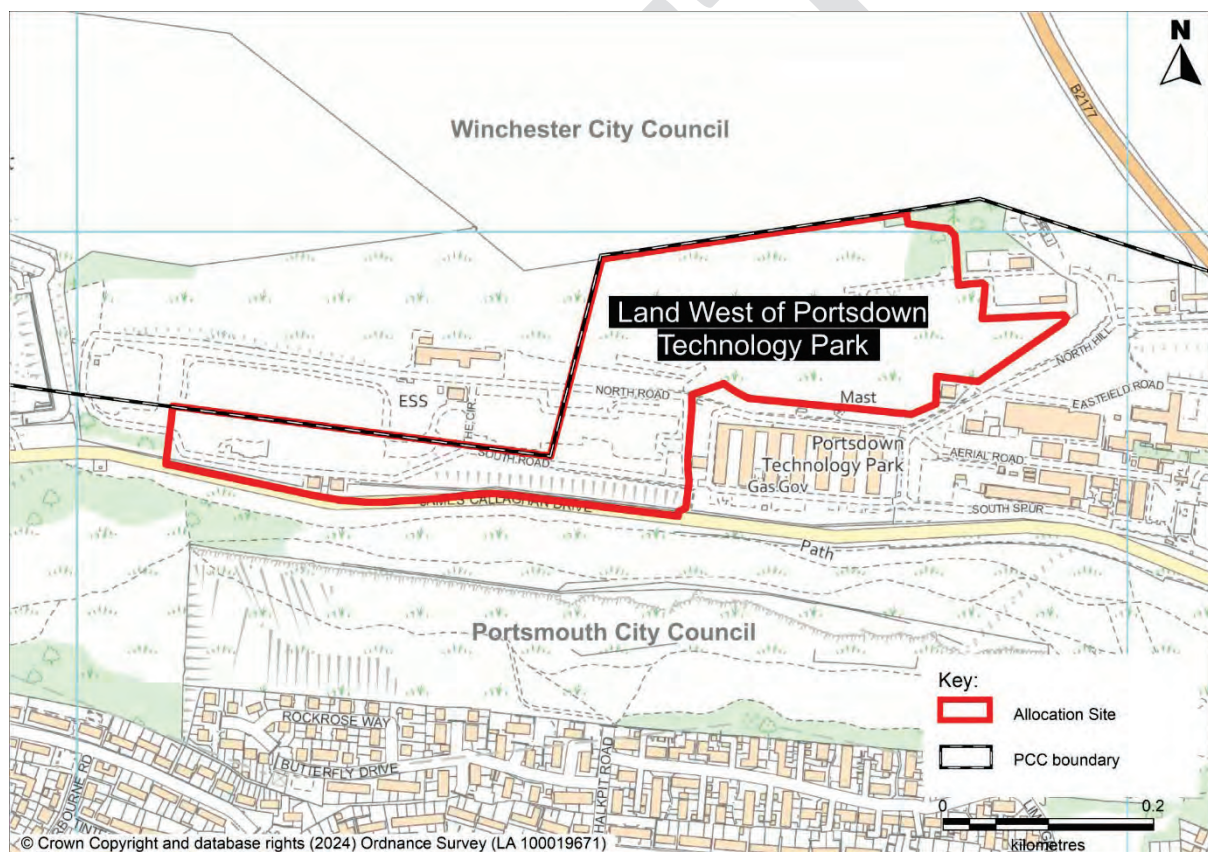


Figure 5.2: Map of Land West of Portsdown Technology Park

5.6 The site is located within a cluster of defence related businesses in a strategic location overlooking Portsmouth Harbour. Portsdown Technology Park is immediately adjacent to the site and it hosts the recently opened National Maritime Systems Centre Innovation and Collaboration Hub. A number of businesses operate from the Portsdown Technology Park including QinetiQ, Metaverse VR and Sirius Analysis. The allocation site is an obvious location for further business development in this cluster.

5.7 The site has been assessed as a potential employment site in a number of studies. The HELAA considered that it has potential for large scale employment intensification within

the existing employment area. The HEDNA⁸² considered it to be suitable for business development and an obvious extension to the existing technology park. The Approach to Employment Land Study by the BE Group⁸³ considered that the site would be suitable for a specialist, niche employment use, rather than to meet generic future demand.

- 5.8 The administrative boundary between Portsmouth City Council and Winchester City Council runs through the site, but the allocation lies entirely in Portsmouth. Fareham Borough adjoins the site to the west. The City Council is liaising with both Councils as a cross boundary issue on the development of the site.
- 5.9 The site is accessed from James Callaghan Drive, which is a single lane road with steep approaches; there is also a private internal road called North Hill. The existing road network is restricted and is a constraint to the intensification of vehicle movements.
- 5.10 At the time of writing (autumn 2023), the southern part of the site fronting James Callaghan Drive has extant permission for the conversion of the vacant former Portsdown Main guard posts for small-scale sui generis use. The far western part of the site bordering Fort Southwick and adjacent the Winchester City Council administrative boundary has extant permission for approximately 1,400 m² floorspace for research and development units, with development outwith the Portsmouth administrative boundary for landscaping.
- 5.11 There are a number of important heritage and nature conservation designations in close proximity to the site. The Scheduled Monument of Fort Southwick is immediately adjacent to the western boundary whilst archaeological finds in the area date back to the Bronze Age. Proximity to the Roman fort of Porchester and its position overlooking the sea point to possible look out points or signalling stations in the wider area. Portsdown Hill Site of Special Scientific Interest is located on the other side of the road to the south.



Site Allocation Policy PLP10: Land West of Portsdown Technology Park

1. Land West of Portsdown Technology Park, as shown on the Policies Map, is allocated for the following use:

- a) 12,500 m² Research & Development class E(g)(ii) and/or manufacturing (class B2).**

2. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:

- a) Provide an Employment & Skills Plan for both the construction and occupation stages of the development;**

⁸² https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

⁸³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-employment-land-study.pdf>

- b) **Provide evidence of the ground conditions and contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority;**
- c) **Ensure effective access arrangements that are safe and suitable for all users;**
- d) **Provide a Travel Plan to minimise car use by current and prospective occupants of the site and to maximise the use of sustainable modes of transport;**
- e) **Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan;**
- f) **Development must be informed by a comprehensive landscape design strategy, which considers views within an agreed zone of visibility and verified viewpoints both to the north and south of the site;**
- g) **Develop a landscaping scheme that positively enhances the contribution of the site to its prominent downland setting and provides navigable links to surrounding green infrastructure assets;**
- h) **Restrict development to the previously developed land adjacent to Portsdown Technology Park and minimise built structures on the northern downland slope; and**
- i) **Any new build development proposals for the site will respond positively to the presence of the following heritage assets:**
 - i. **Fort Southwick Scheduled Monument and its setting; and**
 - ii. **Any undesignated heritage assets within the site.**

Supporting text

5.12 The purpose of this policy is to allocate land for new business premises and expand the defence related business cluster at the top of Portsdown Hill.

5.13 There are a number of defence related businesses located along Portsdown Hill and new research and development premises are the most likely uses to attract business interest. Proposals for new manufacturing premises would also be permitted. Logistics and warehousing (class B8) uses are not likely to be considered acceptable on the site due to the constrained local road network. Future occupants would need to not be in conflict with MoD uses. Housing would dilute the specialised business use and would not be acceptable.

5.14 An Employment & Skills Plan should be submitted with all relevant planning applications for the site and it will be secured either through a planning condition or Section 106 legal agreement. Developers are encouraged to liaise with the Skills and Employment team at the City Council at the earliest opportunity in order to develop a bespoke plan that will deliver positive outcomes for skills and employment in the City.

5.15 The site has a prominent location at the top of Portsmouth Harbour with views to and from prominent landmarks. A Landscape and Visual Impact Assessment (LVIA) prepared in accordance with the Landscape Institute's Guidelines⁸⁴ is required to identify the effects of the proposed development on views and on the landscape itself. The location of development will be guided by the findings of the LVIA, but the presumption is that development will be located close to Portsdown Technology Park and existing built form in order to avoid any 'ribbon' development. Development along the southern strip of the site other than for access would not be permitted.

5.16 Careful consideration should be given to the landscaping of the site due to its prominent location at the top of Portsdown Hill and its close proximity to heritage and nature conservation designations. Clear signage and explanation of the surrounding countryside would help to establish a high quality work environment.

5.17 The site is located adjacent to Fort Southwick, which is a Scheduled Monument built (c.1860) as part of the Palmerston Portsmouth defences. The site has some archaeological potential for prehistoric and/or Roman remains with evidence of barrows and enclosures.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|---|-----------|--|---|--|
| 12,500 m ² R&D and / or manufacturing (B2) | 2025-2030 | Through the Development Management process; working in partnership with developer and land owner | Employment floorspace monitoring in the AMR | By 2030, contact the landowner if planning applications for the site have not been forthcoming |

Table 5.2: Monitoring and Delivery Framework for Land West of Portsdown Technology Park

Port Solent

Introduction

5.18 Port Solent is located in the northwest corner of the City on the northern reaches of Portsmouth Harbour. The area forms part of a 187 hectare reclamation project that started in the 1970's. Port Solent comprises a late 1980's marina development that is predominately residential (town houses and apartments) with some leisure, specialist retail and employment. The allocation includes a strip of land to the south of the marina. The eastern extent of the allocation comprises a cinema, gym and boardwalk occupied predominantly by restaurants and cafes. Port Solent is a popular leisure destination within Portsmouth and therefore, these uses will be safeguarded to ensure the existing centre remains a thriving locality. Pedestrian access is currently enjoyed along the boardwalk and waterfront which must also be retained as part of any future application. To the south of the gym and cinema is a large surface car park. A map of the site is shown in figure 5.3.

⁸⁴ <https://www.landscapeinstitute.org/technical-resource/landscape-visual-impact-assessment/>

5.19 The western extent of the allocation site, west of The Boardwalk, comprises various commercial units, surface car parks and boat yards. The waterfront associated with the western extent of this allocation site will be safeguarded for marine business use.

5.20 Portsmouth City Council have the freehold interest in the site; however, Premier Marinas are long-term leaseholders with occupational tenants. All parties have been effectively engaged with throughout the allocation process.

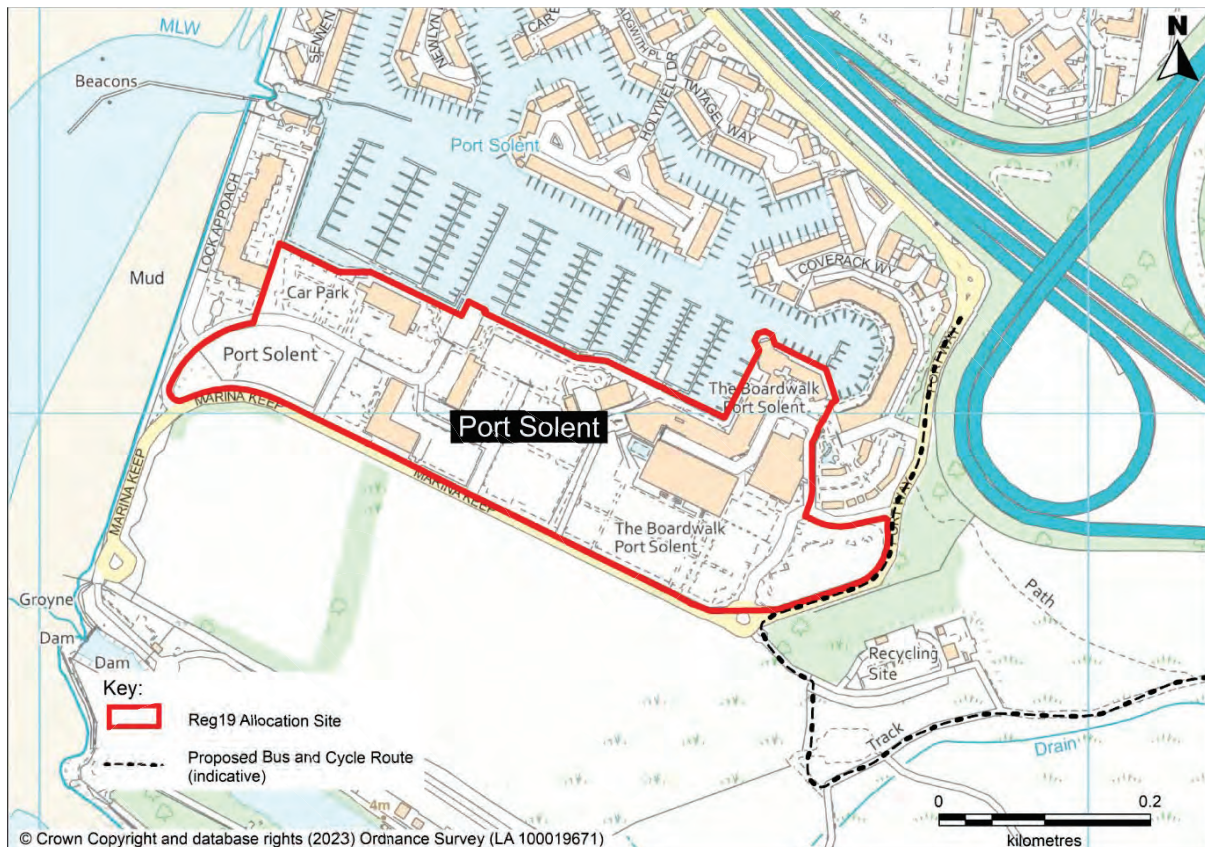


Figure 5.3: Map of Port Solent

5.21 The land at Port Solent is located adjacent to Portsmouth Harbour and Solent Dorset Coast Special Protection Areas (SPA) to the west of Portsea Island, (Part of the 'National Site Network'). Portsmouth Harbour is also designated as a Ramsar site and nationally recognised as a Site of Special Scientific Interest (SSSI). Adjacent to the southern boundary of the site are two large parcels of amenity grassland. These are recognised as being an important supporting habitat for Portsmouth Harbour's Brent goose population. They are identified as Core Areas (P48A and P48B) in the Solent Waders and Brent Goose Strategy⁸⁵ that are regularly used and are of fundamental importance to over-wintering Brent Geese, so are functionally linked to Portsmouth Harbour SPA. Primary support area P48C is located to the south east of these. These sensitivities will need to be addressed as part of any development at Port Solent.

⁸⁵ <https://solentwbgs.wordpress.com/>

- 5.22 The majority of the site is within flood zone 1 with an isolated area in the northeast within flood zone 2. The access road into Port Solent is also located within flood zone 1. It is anticipated that by 2122 the north, northeast and northwest will be located within flood zone 3. The access route will also be at risk of flooding. To deliver a safe development, access arrangements must be made in accordance with Policy PLP31 (Flooding). A sequential approach to land use planning must also be applied within the site.
- 5.23 This area is covered by the North Solent Shoreline Management Plan (SMP) (section 5A21). The Porchester Castle to Emsworth FCERM strategy builds on policies set out within the North Solent SMP. These plans and strategies provide recommendations for flood management measures to protect residents of Portsmouth from flooding. Further information can be found within the Portsmouth SFRA Level 2.
- 5.24 Port Solent was included within the Portsmouth and Southampton City Deal and identified for 500 residential units. Following this, it was allocated within the 2012 Portsmouth Plan, although residential development has yet to be delivered. The City Deal seeks to maximise the economic strengths of Portsmouth as a coastal City, by supporting further growth in the area's maritime, marine and advanced manufacturing sectors whilst providing new housing to support the growing workforce. In line with this, the Council will also support the delivery of new marine and maritime employment at Port Solent.
- 5.25 It has been a long term aim of the Council to improve access to Port Solent. That aim was reflected in City Deal which sought improved public transport connectivity in the form of a new busway connecting Tipner to Horsea Island and Port Solent and utilising a new bridge from the Tipner peninsula. The area is currently limited to a single road access from Southampton Road, and has a poor environment for cycling or walking, being isolated and surrounded by busy roads (M275 / A27). The closest bus stop to Port Solent is approximately a third of a mile north. If significant development is to be achieved then it is essential that access is improved especially by public transport, cycling and walking. This should be operational for bus routes that run along Southampton Road to the north and allow future access for any public transport links via the new bridge link from the south.
- 5.26 In 2011 a Concept Statement⁸⁶ was published, which provided evidence and justification for two strategic development allocations within the Portsmouth Local Plan (2012). This Statement identified the development potential of Port Solent, together with Horsea Island and Tipner. It was intended to be a simple, clear expression of the kind of places that the proposed new developments at Tipner, Port Solent and Horsea Island could create. The Statement provided a design rationale and concept masterplan, which should be considered as part of any development at Port Solent.
- 5.27 There are other issues associated with the site which will need to be overcome for development to be successful. These include access, land contamination, flood risk and the capacity of the existing sewer system.

⁸⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-concept-statement-tipner-port-solent-and-horsea-island.pdf>

5.28 Port Solent is located in close proximity to Horsea Island strategic site which will host a large, high quality public open space as part of a green gateway for the City in 2040. Any development at Port Solent should deliver walking and cycling routes to Horsea Island open space that allow accessibility for everyone.



Site Allocation Policy PLP11: Port Solent

1. Port Solent, as shown on the Policies Map, is allocated for the following uses:

- a) 500 residential units; and**
- b) Marine related uses.**

2. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:

- a) Provide a conceptual framework masterplan as part of any planning application to ensure development of the highest quality that responds positively to the existing character and land uses; and presents a layout of improved access arrangements;**
- b) Provide high quality designed buildings to complement, in design and scale, the existing built form;**
- c) Include measures to avoid and mitigate any adverse impact, including direct recreational impact, on the adjacent SPA, SSSI and Ramsar Site;**
- d) To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. (P48A /P48B/P48C);**
- e) A site specific Flood Risk Assessment should be submitted alongside any application that aligns with the recommendations outlined within the SFRA Level 1 and 2;**
- f) Flood management measures should be incorporated within the site in accordance with the SFRA Level 1 and 2 to reduce the risk to more vulnerable development now and in the future;**
- g) Proposals for surface water management should make provision for storage during high tide events, when the surface water drainage may be subject to tide locking;**
- h) Improve facilities for cycling, walking and public transport linking to, and enhancing, the existing networks and any new networks delivered as part of this allocation including the new busway link to Tipner;**

- i) **Submission of a Travel Plan and Transport Assessment to assess the potential transport impacts of the development, propose mitigation measures and opportunities to implement effective sustainable transport initiatives;**
- j) **Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Delivery Plan;**
- k) **Safeguard the existing cinema, gym, retail and restaurant uses from redevelopment;**
- l) **If a robust marketing campaign of at least twelve months, its scope having been agreed in writing in advance by the local planning authority, clearly demonstrates that there is insufficient market demand for leisure, retail and restaurant uses at this location, development proposals for other uses that complement the marine and residential location will be allowed;**
- m) **Safeguard accessible pedestrian access to the waterfront;**
- n) **Ensure the amenity of occupiers / users of any new development can be adequately protected; and**
- o) **Protect viewpoints and the wider visual impact across Portsmouth Harbour, including the impact on Porchester Castle.**

Supporting text

5.29 The purpose of this policy is to deliver a sustainable expansion at Port Solent to meet the aspirations of the City Deal *'to maximise the impact of key marine and maritime assets through the provision of new housing and employment sites'*.

5.30 All development proposals for this site must form part of a framework masterplan, alongside a site-wide design code to be agreed in writing by the Local Planning Authority. This will ensure that development integrates seamlessly with the existing land uses and character of the site and its surroundings. The masterplan should take account of the Concept Statement that supported the Portsmouth Local Plan 2012. It should also include details of new and improved access arrangements including links to the wider transport network.

5.31 The developer needs to safeguard the integrity of the Portsmouth Harbour SPA and Solent and Dorset Coast SPA, Ramsar and SSSI site and nearby supporting habitats for overwintering birds. The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars (Core Areas P48A and B and Primary Support Area P48C)⁸⁷. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. An additional 500 dwellings at this site has the potential to increase direct recreational impact on these habitats and cause disturbance to overwintering birds

⁸⁷

<https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

using the SPA and supporting habitats⁸⁸ in particular. Mitigation should be sought in accordance with the Solent Waders and Brent Goose Strategy⁸⁹ and a project level HRA and EIA will be required for any planning applications at Port Solent. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.

- 5.32 The coastline surrounding Port Solent is expected to be safeguarded for the management and delivery of any new flood defence structures in accordance with the Portchester Castle to Emsworth Strategy⁹⁰. Evidence will need to be provided in the form of a site-specific flood risk assessment that shows the site has passed the exception test and development is safe for its lifetime. Flood management measures such as land raising will be required to enable development of more vulnerable uses and key infrastructure.
- 5.33 In accordance with Policy PLP31 (flooding), robust evidence must show that all efforts have been made to deliver safe access and egress routes on sites at risk of flooding. Where truly exceptional circumstances dictate this not to be feasible, it must be clearly detailed in a site specific FRA how the risks of flooding can be safely managed. Information on duration, hazard and frequency of flooding must be provided for the development lifetime.
- 5.34 New development should discharge runoff to the sea following suitable treatment. Storage of surface water should be managed when the sea level rises to a height that will not allow for drainage.
- 5.35 To ensure Port Solent becomes a sustainable location for new development, improved bus, cycle, walking and other sustainable infrastructure modes such as car clubs must be delivered. Bus stops should be introduced at Port Solent to allow easier access to public transport for residents. Safe and accessible cycle access should also be delivered as part of the development. Land should be safeguarded for any future links to the busway bridge link between Horsea Island and Tipner. This will allow for a sustainable route from Port Solent directly onto Portsea Island. The site was assessed as part of the Transport Study and recommendations carried through to the development requirements of the policy. Any further transport improvements should be made in line with Portsmouth Local Transport Plan 4.
- 5.36 Port Solent is currently a popular leisure destination for visitors and local residents. The existing gym, cinema and restaurants/cafes along the boardwalk will be safeguarded from any redevelopment. All efforts should be taken to ensure the Boardwalk remains the centre for Port Solent. Local convenience stores will be permitted within appropriate locations along the Boardwalk to meet the needs of the local community. Only where a robust marketing campaign provides evidence that there is insufficient market demand for these uses at Port Solent, will development proposals for other come uses be

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<https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

⁸⁹ <https://solentwbgs.files.wordpress.com/2021/03/solent-waders-brent-goose-strategy-2020.pdf>

⁹⁰ <https://coastalpartners.org.uk/project/portchester-castle-to-emsworth-strategy/>

permitted. Any other use must complement the existing marina and residential location and integrate seamlessly into the existing character of the local area.

5.37 Pedestrian access is currently enjoyed along the waterfront. As part of any future development, it is important that this access is retained. Accessible, legible, and safe routes throughout the site to enable easy access to the waterfront should be provided.

5.38 The location of the development requires careful consideration of residential amenity, including any noise pollution from the strategic road network and potential noise implications of the local restaurants, bars and leisure facilities. A robust design and access statement should set out how amenity has been considered and protected.

5.39 The site also offers the potential for views out over Portsmouth Harbour and towards Porchester Castle. Where these views are currently achievable from public viewpoints all effort should be made to protect these. The application should be supported by a Landscape and Visual Impact Assessment to show how key viewpoints have been taken into consideration. This includes the protection of wider views, towards the site including from Porchester Castle and other key landmarks.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|---|--|--|--------------------------------------|--|
| Replacement and refurbishment of flood defence structures | Prior to occupation of residential dwellings | Through the development Management process; working in partnership with developer, freeholder and leaseholder. | Infrastructure monitoring in the AMR | Ongoing liaison with site developer to understand delivery timescales more precisely. |
| Improved access for sustainable transport modes from and to the A27 | 2035 - 2040 | Through the development management process; working in partnership with developer, freeholder and leaseholder. | Infrastructure monitoring in the AMR | Ongoing liaison with site developer to understand delivery timescales more precisely. |
| 500 residential dwellings. | 2035 - 2040 | Through the development management process; working in partnership with developer, freeholder and leaseholder. | Housing monitoring in the AMR | Ongoing liaison with PCC as the freeholder and the long-term leaseholder to understand delivery timescales more precisely. |
| Safeguard land for future links to busway bridge | Throughout the plan period | Through the development Management process; working in partnership with developer, freeholder and leaseholder. | Infrastructure monitoring in the AMR | Ongoing liaison with site developer to understand delivery timescales more precisely. |

Table 5.3: Monitoring and Delivery Framework for Port Solent

St John's College

Introduction

5.40 St John's College is a former private school located in the heart of Southsea and in Owen's Southsea Conservation Area. It is situated to the east of Grove Road South, which is also the location of its principal access. The school was a private day and boarding school and moved to the site in 1912. At this point the school purchased Grove House, known today as the Castle, and Warleigh House. The college subsequently purchased other properties in its vicinity, settling the entire urban campus. This is reflected in the built form of the site with as number of older residential villas having been converted to educational use and school buildings. The school closed in 2022 and was purchased by a residential developer, which specialises in developing sites with historic buildings.

5.41 St John's is located in the residential heart of Southsea, north of the main retail areas of Southsea Centre, Albert Road and Elm Grove. The area is characterised by larger residential properties set in quiet back streets. The site also sits within the Owen's Southsea Conservation Area⁹¹, an attractive area of early nineteenth century picturesque townscape designated for its historical association with the 'Father of Southsea' Thomas Ellis Owen. The site comprises a number of historic villas which were incorporated into the college when it moved to the site in the early twentieth century. There are also purpose-built school buildings from this period that also enjoy architectural significance. The villas offer the potential for sympathetic conversion back into residential use with relative ease. A map of the site is shown as figure 5.4.

5.42 St John's College is located within flood zone 1. It is predicted that by 2122, the north, northeast and northwest will be located within flood zone 3. This is however based on an undefended scenario and it is therefore anticipated that the completion of the Southsea Coastal Scheme is likely to reduce this risk to an acceptable level.

⁹¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-article-42-direction-owens-southsea-guidelines.pdf>

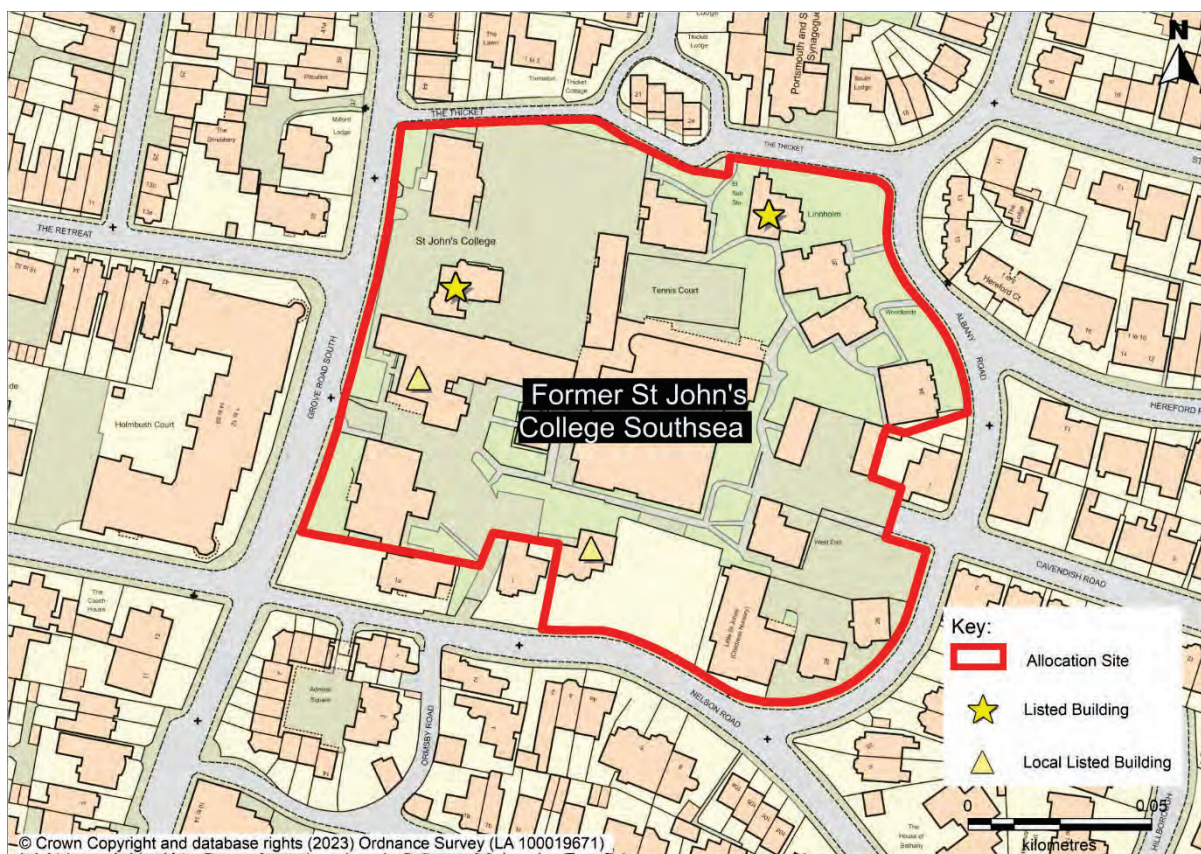


Figure 5.4: Map of St John's College

5.43 The College is identified in the HELAA as having potential for 212 dwellings. The main constraints on the site identified in the HELAA are the significant presence of mature trees some of which are protected, two Listed Buildings (The Castle and Linholm) and three Locally Listed buildings (The Scholes Building, St Catherine's House, and No.3 Nelson Road). An application (23/01089/FUL) has been submitted for the conversion and extension of the former college buildings to create 110 apartments and demolition of college buildings and erection of new buildings to create 102 apartments utilising existing access from Grove Road South, Nelson Road and Albany Road.

Site Allocation Policy PLP12: St John's College



1. St John's College, as shown on the Policies Map, is allocated for the development of the following uses:

a) 212 dwellings.

2. Development proposals for the above named use will be permitted provided that they meet all of the following site specific development requirements:

a) Provide an indicative masterplan as part of any planning application to ensure that development is of the highest quality and includes a layout indicating improved access arrangement with the surrounding residential areas;

b) Retain, restore, and where possible enhance the fabric and setting(s) of any historic assets on the site, as shown in figure 5.4;

- c) **Conserve or enhance the character and appearance of the Owen's Southsea Conservation area and ensure the retention and protection of any trees on the site;**
- d) **Any new build development proposals must also respond positively and sympathetically to the presence of the existing designated and undesignated heritage assets on the site;**
- e) **Enhance safe and accessible pedestrian connectivity through the site by providing access through the perimeter wall by reopening gateways at points to be agreed with the Local Planning Authority;**
- f) **Development proposals will be permitted that provide public access to and through the site at all times.**
- g) **Take opportunities to provide new publicly accessible open space onsite;**
- h) **Take opportunities to create greening on site, including incorporating existing mature planting;**
- i) **Take advantage of the site's sustainable location to provide reduced car parking provision;**
- j) **Submission of a Travel Plan and Transport Assessment to assess the potential transport impacts of the development, acts and implications, propose mitigation measures and identify opportunities to implement effective sustainable transport initiatives; and**
- k) **Flood management measures should be incorporated within the site in accordance with the SFRA Level 1 and 2 to reduce the risk to more vulnerable development now and in the future.**
- l) **An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site;**

Supporting text

5.44 The purpose of this policy is to provide new homes on the former St John's College site. These should conserve the historic fabric and setting of the site and harmonise positively with their surroundings.

5.45 A number of the statutorily listed, locally listed and other buildings of architectural merit on the site have been subject to unsympathetic past alteration. Where they enjoy surviving features of historical and/ or architectural significance these must be retained. Any development proposals should take the opportunity to fully understand the nature and extent of any changes which have taken place and where appropriate should seek to enhance the condition and appearance of these buildings. Any alterations to existing assets should be avoided/ limited in nature. Where they are proposed, they must respond to and harmonise appropriately with their recipient building and the character of the surrounding Conservation Area.

5.46 The site is enclosed to the south, east and north by a substantial brick boundary wall, elements of which date from the late nineteenth century. This prominent structure makes an important contribution to the townscape of the area and must be retained. Any alterations to the wall (including new openings) must be kept to an absolute minimum. Their design should also respond positively to character and appearance of the original.

5.47 As a school, the site was largely inaccessible to the public for a long period of time. Opening the site up to pedestrian access will enable it to better be incorporated as part of the wider community. There are a number of gates in the existing perimeter wall, which should be made accessible for pedestrian access where practicable. Proposals that close the site off to public access by use of gates or other measured will be refused.

5.48 The site has a number of interconnected green spaces. Development proposals should retain and enhance these wherever possible, providing a network of complimentary accessible spaces for the use of future residents and visitors. Spaces that provide amenity for residents of all ages and incorporate biodiversity and greening in their design will be preferred to areas landscaped solely for aesthetics. Trees on site are protected by the Owen's Southsea Conservation area and TPO45, and any removals or alteration to trees should be carried out in a manner which is sympathetic to the setting of the buildings and spaces on site. New and enhanced open spaces in the site should respect and enhance the setting of the historic buildings.

5.49 St John's is located close to the heart of Southsea and the facilities at the Southsea Town Centre, as well as the Seafront and Common. The site is also immediately served by buses on Grove Road South. It is therefore considered that it is the site may be suitable for reduced onsite parking provision.

5.50 Flood management measures should be incorporated into the site to protect more vulnerable land uses and key infrastructure these could include such measures as land raising, and inclusion of places of safety for extreme flood events. Flood mitigation measures should be designed to be compatible with other key requirements of the policy such as protecting the historic environment. The Southsea Coastal Scheme, when complete, is likely to reduce the flood risk to an acceptable level, although the assessment of residual risk from breach or overtopping would need to confirm this. The Southsea Coastal Scheme is due for completion in 2029 and therefore, where more vulnerable development is proposed prior to this, robust evidence must be provided demonstrating how more vulnerable development and residents are kept safe in the event of a flood.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--------------------------------|-----------|--|-------------------------------|--|
| 212 Dwellings | 2030-2035 | Through the development Management process; working in partnership with Developer, freeholder and leaseholder. | Housing monitoring in the AMR | Ongoing liaison with The developer and close cooperation to identify potential sources of delay and deliver timescales more precisely. |

Table 5.4: Monitoring and Delivery Framework for St John's College

Fraser Range

Introduction

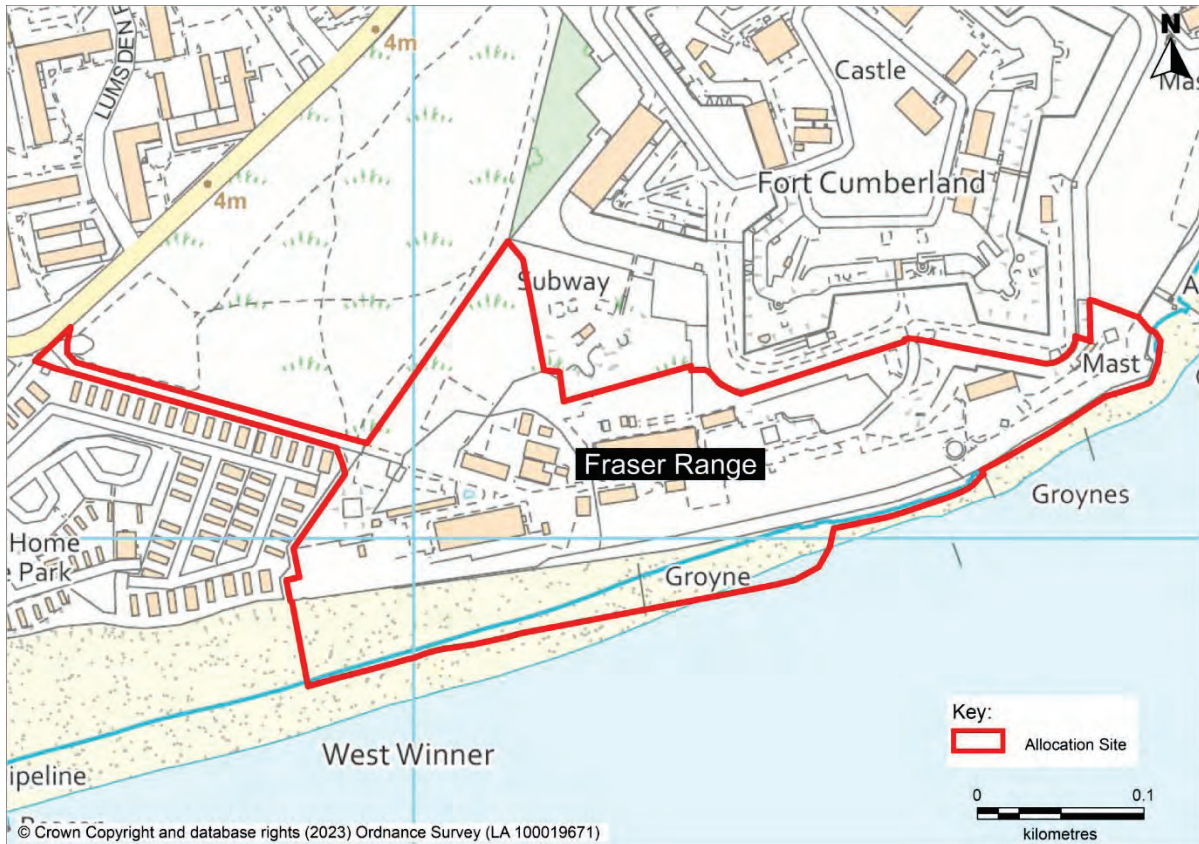


Figure 5.5: Map of Fraser Range

5.51 Fraser Range is located in an area of distinct character on the water's edge at the southeastern point of Portsea Island. The site covers an area of 6.5 hectares and historically was a research centre for Naval Gunnery. Originally occupied by the Royal Navy, in 2001 it was purchased by the defence contractor QinetiQ. Surplus to requirements it was permanently closed in 2006 (and has been vacant ever since). The site consists of a single development area, linked to the nearby Fort Cumberland Road by a narrow, access road. A map of the site is shown in figure 5.5. It should be noted that the red line extends over part of the adjacent beach covering the site of listed tank traps the removal, storage and subsequent re-siting of which form an important aspect of the scheme.

5.52 Fort Cumberland, a rare eighteenth century Star Fort, designated as a Scheduled Monument and Grade II Listed Building, lies adjacent, and immediately to the north. A modest element of the fort's scheduled footprint extends into the Range on the East of the site. Southsea Leisure Park, a static caravan holiday site lies to the west. Fort Cumberland Open Space and beyond residential areas lie to the north-west. Along its southern boundary, the site abuts Eastney Beach a relatively narrow shingle/ sand strip that is also the site of a Grade II listed World War II linear tank trap; the beach has been used for many years as a 'clothing optional beach'.

5.53 The western part of the allocation site is predominantly characterised by a concentration of relatively low rise, and loosely dispersed non-residential buildings

including office blocks, stores, research labs, and light industrial workshops. These are at different scales, but share a coherent utilitarian architectural style. They are also set within open but discrete areas of green space. The eastern part of the site is, with the exception of a single building, essentially open and 'green' in character and has a very high ecological value.

5.54 The majority of the site is currently within flood zone 3. The eastern end of the site is more elevated and within flood zone 1. It is predicted that by 2122, the western part of the site and a large part of Eastney will be within flood zone 3. Flood risk is therefore a highly important consideration for this site.

5.55 Portsea Island is covered by the North Solent Shoreline Management Plan (SMP) (section 5aPI01 and 5aPI02). The Portsea Island Coastal Strategy Study (PICSS) was developed to build on policies set out in the North Solent SMP. These plans and strategies provide recommendations for flood management measures to protect residents of Portsmouth from flooding. Further information can be found within the SFRA Level 2.

5.56 The site does not currently enjoy public access and its relative inaccessibility gives the area a secluded feel. Its exposed coastal location at the eastern extremity of Portsea Island nevertheless provides for excellent open views over the eastern Solent and Isle of Wight beyond. The character of the site contrasts strongly with the more conventional higher density inland suburban areas that surround the Range to the west and north.

5.57 At the time of writing (autumn 2023) the site is the subject of a current planning application (19/00420/FUL) for the part demolition, redevelopment and conversion of three existing structures and the construction of new buildings to create 116 apartments and 18 houses, new sea wall flood defences and a related walkway (to include removal and reinstatement of tank traps).

5.58 The HELAA identified a number of constraints impacting on the site. These will need addressing through a number of evidence-based studies that will be required to support a submission at the application stage. It should be noted that development proposals may require Scheduled Monument Consent in addition to planning consent.



Site Allocation Policy PLP13: Fraser Range

1. Fraser Range, as shown on the Policies Map, is allocated for the development of the following uses:

- a) 134 dwellings;**
- b) Construction of new sea wall flood defence and a related accessible walkway to link round the coast to also include removal and reinstatement of Grade II listed tank traps to existing pattern; and**
- c) Construction of access road, parking and landscaping works.**

- 2. Development proposals for the above uses will be permitted provided that they meet all of the following development requirements:**
- a) The design and layout of any proposals must retain and preserve the open and green character of the eastern part of the site, and appropriately integrate, and where possible enhance the locally distinct landscape setting of the rest of the site;**
 - b) Development must protect any areas within the site or nearby that form part of the National Site Network, Ramsar Sites, Sites of Special Scientific Interest (SSSI) and any other nationally or locally designated habitat sites including supporting habitats;**
 - c) A Habitat Regulations Assessment (HRA) of the site will be required, and provision of appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA and/or Solent Maritime SAC;**
 - d) To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars (P78/ P142 / P144);**
 - e) The developer will provide mitigation of any alone impacts on the habitat that is functionally linked to Solent's SPAs / Ramsars (P78 / P142 / P144). This is in addition to the contributions provided through the Solent Recreation Mitigation Strategy.**
 - f) Any new build development proposals for the site must respond positively to the presence of the following heritage assets:
 - i. Fort Cumberland (Scheduled Ancient Monument and Grade II listed);**
 - ii. World War II Anti Tank Defences (Grade II listed); and**
 - iii. Any undesignated heritage assets within the Range site including where possible the remains of any gun emplacements on the eastern part of the site that shall be retained and their significance and setting conserved.****
 - g) Provide a Heritage Statement that assesses the significance and impact of all proposals on any heritage assets that are part of or lie within the setting of the site. This assessment must inform the layout and design of any proposals for the site;**
 - h) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2. These should be delivered at Fraser Range to ensure any proposed development as part of this allocation is safe from floodwaters for its lifetime;**
 - i) A site-specific Flood Risk Assessment will be required in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan;**

- j) Proposals for surface water management should make provision for storage during high tide events, when the surface water drainage may be subject to tide locking;**
- k) Secure the construction of an enhanced and appropriate access road, and landscaping works;**
- l) Provide safe, appropriate, publicly accessible off-road walking and cycling routes around/through the site. These must link the site to the nearby Fort Cumberland Road to the north west, but must not add to the disturbance of the ecologically sensitive parts of the site to the east;**
- m) Development proposals will be permitted that provide public access to and through the site at all times.**
- n) A Transport Assessment will be required, to examine the potential transport impacts and implications of any scheme, propose mitigation measures and identify opportunities to implement effective sustainable transport initiatives.**

Supporting text

5.59 The purpose of this policy is to allocate Fraser Range and ensure that development of the site delivers a significant quantity of new homes, a new sea wall flood defence and a new, extended accessible coastal path which secures access around the coast of Portsea Island.

5.60 The site is subject to a range of constraints. Securing a positive response to the policy will require the integration and protection of the ecological and heritage designations on and around the site. In light of this, the density, heights and distribution of built form and therefore the housing capacity of the site will be influenced by the impact(s) of any proposals on the integrity of the national and internationally designated ecological sites, and on the setting of the adjacent Scheduled Fort Cumberland.

5.61 To ensure that development can be delivered without creating substantial impacts to the nearby road network, and that the site enjoys safe, and appropriate access not only for vehicles but also pedestrians and cyclists, it will be necessary to secure enhancements to its existing access route. These should take the form of a widened and resurfaced carriageway and the provision of a new adjacent pedestrian footway linking the site to nearest main road. Any scheme must also secure and retain public access to the site. Proposals that close the site off by the use of gates or other measures will be refused.

5.62 The character of the site is very much derived from its open, and green qualities, and its exposed aspect on to the sea. These are important characteristics, and any proposals must seek to retain these qualities for the site. The area's ecological/ biodiversity value is very high. It lies partly within a number of SPA's and a related Ramsar site. It also sits within the Solent Maritime SAC, the Langstone Harbour SSSI, as well as three SINCs: Fort Cumberland, Land West of Fort Cumberland and Eastney Beach.

- 5.63 The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. These are the Primary Support area P78 and P142⁹² and the Low Use site P144 both of which are located on the beach adjoining the site. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity. Advice received from Natural England in December 2023 and April 2024 stated that the development of Fraser Range may also have an 'alone' impact on the functionally linked habitat and that it is likely to require site specific mitigation over and above the contributions to the Solent Recreation Mitigation Strategy. Evidence of how this mitigation will be achieved will need to be provided by the developer and agreed by PCC.
- 5.64 In light of these factors, it will be necessary to ensure that the impact of any development on the integrity of any relevant national and internationally designated sites will, where possible, be avoided. Any landscaping proposals for the site will, if required, need to identify and secure appropriate protection of these areas, including where possible measures both to manage/ limit access to the most ecologically sensitive parts of the site, and to mitigate for the potential loss of suitable habitats for species.
- 5.65 The area's history as an MoD site, means that there may also be potential for ground contamination, which if necessary, would also need to be appropriately addressed.
- 5.66 The site's coastal location means that a majority of its area is located within Flood Zone 3. It should be noted that this designation does not however consider the presence of any flood defences. The current seawall surrounding the site is in poor condition. Ultimately it will not be capable of defending this part of the coast, and therefore any development on the site from inundation. For this reason, the erection of comprehensive new sea defences, that integrate effectively with proposed enhancements to existing defences adjacent to the site and secure the site against flooding will be necessary. This should be informed by the SFRA level 1 and 2 and must incorporate detailed site specific wave overtopping calculations along with suitable calculations for freeboard.
- 5.67 Other flood management measures such as land raising should also be incorporated into the site.
- 5.68 To ensure the safety of all residents; in accordance with Policy PLP31 (flooding), robust evidence must show that all efforts have been made to deliver safe access and egress routes on sites at risk of flooding. Where truly exceptional circumstances dictate this not to be feasible, it must be clearly detailed in a site specific FRA how the risks of flooding can be safely managed. Information on duration, hazard and frequency of flooding must be provided for the development lifetime.

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<https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

5.69 New development should discharge runoff to the sea following suitable treatment. Storage of surface water should be managed when the sea level rises to a height that will not allow for drainage.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|--|-----------|--|--|---|
| New Sea Wall and Flood Defence Works including Attenuation Ponds | 2025-30 | Through the development Management process; working in partnership with Developer. | Infrastructure monitoring in the AMR and in future iterations of the IDP | Ongoing liaison with site developer to understand delivery timescales more precisely. |
| Main Road and access infrastructure | 2025-30 | Through the development Management process; working in partnership with Developer. | Infrastructure monitoring in the AMR | Ongoing liaison with site developer to understand delivery timescales more precisely. |
| 40 residential dwellings and landscaping | 2025-30 | Through the development Management process; working in partnership with Developer. | Housing monitoring in the AMR | Ongoing liaison with site developer to understand delivery timescales more precisely. |
| 94 residential dwellings and landscaping | 2030-35 | Through the development Management process; working in partnership with Developer. | Housing monitoring in the AMR | Ongoing liaison with site developer to understand delivery timescales more precisely. |

Table 5.5: Monitoring and Delivery Framework for Fraser Range

The News Centre

Introduction

5.70 The site is a former printing press centre, which has been vacant since July 2022. It is strategically situated on a prominent junction of the A3 and London Road (A2047) in Hilsea and in very close proximity to the M27 and Portsbridge roundabout. As such, this is a busy gateway location surrounded by a mix of residential (generally low density semi-detached and detached houses, with flatted development opposite and to the north of the site on London Road), education, army barracks, small scale commercial uses including local shops and open space. A map of the site is shown as figure 5.6.

5.71 The News Centre site is owned by First Bus, who intend to develop a new purpose built 'super depot' to accommodate a fleet of electric buses. This use aligns well with the Council's aim to prioritise sustainable transport and will help make a real contribution to climate change mitigation. The site's location on a major road with good links to the rest of the City and the strategic road network makes it suitable for a sustainable transport hub.

5.72 The site presents an opportunity to maximise development as a gateway location to Portsea Island, with potential for residential and community uses to complement the bus depot.

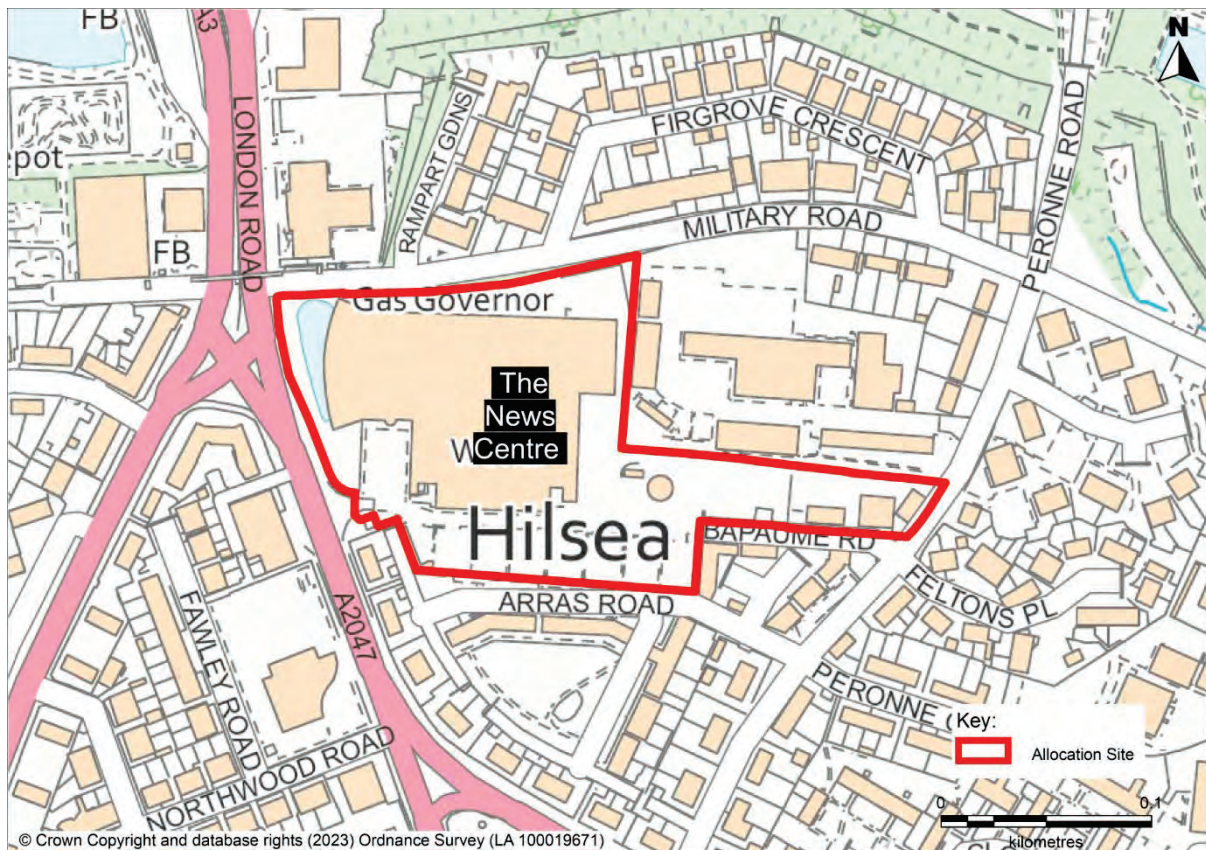


Figure 5.6: Map of the News Centre, Hilsea

5.73 The News Centre was a 1960s modernist style building, designed by local architects, Cogswell & Sons, with a pond and landscaping facing onto London Road. The building was and site still is locally distinct. The western part of the site contains a cluster of mature trees fronting London Road, and it is bordered to the north, south and east by trees, contributing to local character and green infrastructure. A Tree Protection Order (TPO) is in place at the Territorial Army Centre adjoining the east of the site.

5.74 The site and surrounding area is located within flood zone 3. It should be noted however that this is an undefended scenario. The final phase (Phase 5) of the North Portsea Island scheme, which is expected to be delivered by 2026 should reduce the flood risk to an acceptable level.

5.75 The location on a busy main road means that noise-sensitive development such as housing will need appropriate mitigation and design to protect the amenity of occupiers. In addition, the level of traffic at the junction and the proposed electric bus garage will

need thorough assessment and transport modelling. Improvements may be required to ensure appropriate and safe access for electric buses, residential occupiers and for any other uses put forward at the site.

5.76 Historic Environment Records show close proximity of the site to a number of sensitive archaeological and historic assets, including the Hilsea Lines and a number of Listed Buildings. The setting of these assets should be considered as part of the design of any development of the site.

5.77 Prior approval for demolition of the News Centre and associated ancillary buildings was approved in August 2023. Demolition of the former News Centre building was complete in spring 2024. There is no other relevant planning history on the site.

5.78 The main evidence based studies supporting the allocation are the HELAA, the SFRA levels 1 and 2, the Historic Environment Records and the Transport Study.



Site Allocation Policy PLP14: The News Centre, Hilsea

- 1. The News Centre, as shown on the Policies Map, is allocated for comprehensive mixed use development for the following uses:**
 - a) A purpose built all-electric bus depot; and**
 - b) 100 homes.; and**
 - c) Community uses.**
- 2. Small scale ancillary uses, including for commercial purposes, may be appropriate depending on their type and scale, impacts on the surrounding area and nearby centres designated in Portsmouth's Town Centre Hierarchy, and where they do not compromise the site's allocated uses.**
- 3. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:**
 - a) Achieves exemplar design that maximises the site's gateway location and provides comprehensive redevelopment of the site;**
 - b) Retains and enhances the distinct character and green infrastructure of the site, to include protection of the cluster of mature trees fronting London Road, a pair of pine trees in the south-west of the site adjacent to the electric substation, trees bordering the site to the north and east, and a TPO located at the Territorial Army Centre. An Arboricultural Assessment should be submitted to demonstrate that this can be satisfactorily achieved;**
 - c) The design of the site should seek to respond to and celebrate distinct elements of the original building's historic presence and architecture;**

- d) **Delivery of new homes towards the higher end of the medium density range, to maximise use of land in this core residential area;**
- e) **Incorporates appropriate mitigation and design measures to minimise and protect future occupiers of residential development from harmful levels of noise and air pollution from nearby roads;**
- f) **Appropriate, efficient and safe access for a high level of use from buses, to and from the site onto the London Road (A2047) and the A3;**
- g) **Provide safe, permeable and convenient local pedestrian and cycle links, particularly north-south along main roads;**
- h) **Submit a Travel Plan and Transport Assessment to analyse the potential transport impacts and implications on the local highway network, propose mitigation measures and identify opportunities to implement effective sustainable transport initiatives;**
- i) **The site falls within Flood Zones 2 and 3a and a site specific Flood Risk Assessment will be prepared and submitted in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan; and**
- j) **Flood management measures should be incorporated within the site in accordance with the SFRA Level 1 and 2 to reduce the risk to more vulnerable development and key infrastructure, now and in the future.**

Supporting text

5.79 The purpose of this policy is to ensure comprehensive redevelopment of this gateway site for mixed use development that delivers significant sustainable transport in the City and creates high quality homes to meet the needs of local people.

5.80 The location is suitable for residential development that makes efficient and effective use of land while fitting with the context and character of the area. Therefore a density towards the higher end of the medium density range described in Policy PLP21: Residential Density is appropriate. Exemplar design which meets or exceeds the high standard and quality required by Policy PLP1 - Design is sought on the site. The site's design should positively relate to the site's context, local character and identity.

5.81 The former News Centre building is a distinct example of twentieth century architecture, and while not formally designated, it is locally important in terms of its historical presence. Criteria iii. of Policy PLP14 seeks to ensure development incorporates historical reference to the former building by celebrating its distinct elements, where possible. This may be through conservation of abstract pre-cast concrete panels which formed part of the construction of the original print works.

5.82 Community uses are included in the allocation to support the needs of new residents on the site and the local community more widely. The space for community use would be provided at ground floor level with residential development on upper floors. Community uses may include healthcare uses such as doctors and dentists, community meetings

places, learning and non-residential institutions such as a public library and/or a small local shop. A safe space could also be provided for vulnerable people.

- 5.83 Due regard should be given to conserving the setting of a number of sensitive archaeological and historic assets, including the Hilsea Lines and a number of Listed Buildings, which fall within a 500m radius of the site. Applicants should consult the Historic Environment Records held by the City Council.
- 5.84 The site currently contains a pond and landscaping, and a cluster of trees fronting London Road, which adds an important element of greening to the surrounding, largely urban environment. The News Centre is bordered by trees which provide screening to adjacent residential occupiers and other uses. Retaining and protecting trees, including their root zones, where they fall either within or outside the site boundary, and enhancing green infrastructure should be integral to the site's design. An Arboricultural Assessment should be submitted to the Council as part of any application for development.
- 5.85 As a mixed use allocation, development may include small scale ancillary uses, including for commercial purposes. These should complement the allocated uses of the site, and will not be permitted where they are out of scale to the point of undermining delivery of those allocated uses, or where they are considered to have a significant adverse impact on centres designated within the City's Town Centre Hierarchy, in line with PLP23 Small Shops.
- 5.86 The proposed mixed use development including an electric bus depot will need further detailed transport modelling and assessment, with regard to junction and local highway capacity, to ensure that the scheme can be delivered without creating substantial adverse impacts on the Highways network.
- 5.87 The site currently falls within Flood Zones 2 and 3a, and evidence will need to be submitted in a site specific Flood Risk Assessment in support any application. This is to ensure flood risk can be appropriately dealt and future residents made safe through appropriate design and mitigation.
- 5.88 Flood management measures, such as land raising should be incorporated into the site. The North Portsea Island scheme, when complete, are likely to reduce the flood risk to an acceptable level, although the assessment of residual risk from breach or overtopping would need to confirm this in a Flood Risk Assessment. The North Portsea Island Scheme is due for completion in 2026 and therefore, where more vulnerable development is proposed prior to this, robust evidence must be provided demonstrating how more vulnerable development and residents are kept safe in the event of a flood.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|---|------------------|--|---|---|
| Transport - electric bus depot | 2025-2030 | Through the Development Management process; working in partnership with developer and land owner | Infrastructure monitoring in the AMR and future iterations of and engagement in the IDP | By 2028, contact the landowner if a planning application for this element of the site has not been forthcoming. |

| | | | | |
|-----------------|-----------|--|-------------------------------|--|
| 100 homes (net) | 2030-2035 | Through the Development Management process; working in partnership with developer and land owner | Housing monitoring in the AMR | By 2032, contact the landowner if a planning application for this element of the site has not been forthcoming |
|-----------------|-----------|--|-------------------------------|--|

Table 5.6: Monitoring and Delivery Framework for The News Centre

Somers Orchard

Introduction

5.89 The site falls within the western part of the Somerstown area of the City. Somerstown is mainly characterised by high rise mid twentieth century housing, largely public in tenure and constructed to replace the previous townscape in the area which suffered significant damage during World War Two, and was comprehensively redeveloped in the 1960s. The site borders King Street Conservation Area to the south, which consists of a mix of Victorian period terraces, post-war flats and more recent groups of modern, mainly terraced housing. It is also adjacent to the Terraces Conservation Area to the north west, which retains much of its original nineteenth century character, with a mix of predominantly Victorian and Edwardian styles. It is located on the southern fringe of the City Centre and benefits from close proximity to mixed use activities leading up to the centre. A map of the site forms figure 5.7.

5.90 Somers Orchard was identified in the Council's HELAA as having potential for 565 dwellings, following clearance of the former Horatia and Lemington Houses. The Somers Orchard site is being brought forward through the City Council's Housing Revenue Account, as part of the design evolution for the site there has been significant public consultation⁹³ over a period of several years. A planning application is expected to be submitted in the autumn of 2023.

5.91 The site comprises three main sections: the cleared site of the former buildings, the forecourts, courtyards and open space around a number of 'Birmingham Block' maisonettes (to be retained) and the site of the Gibson Centre, which is proposed for redevelopment. It is anticipated that the development would take place in phases with the first phase being the redevelopment of the sites of the two towers with the landscaping around the Birmingham Blocks and the redevelopment of the Gibson Centre following that.

⁹³ <https://www.portsmouth.gov.uk/services/housing/housing-development/somers-orchard-former-horatia-and-lemington-houses-site/>

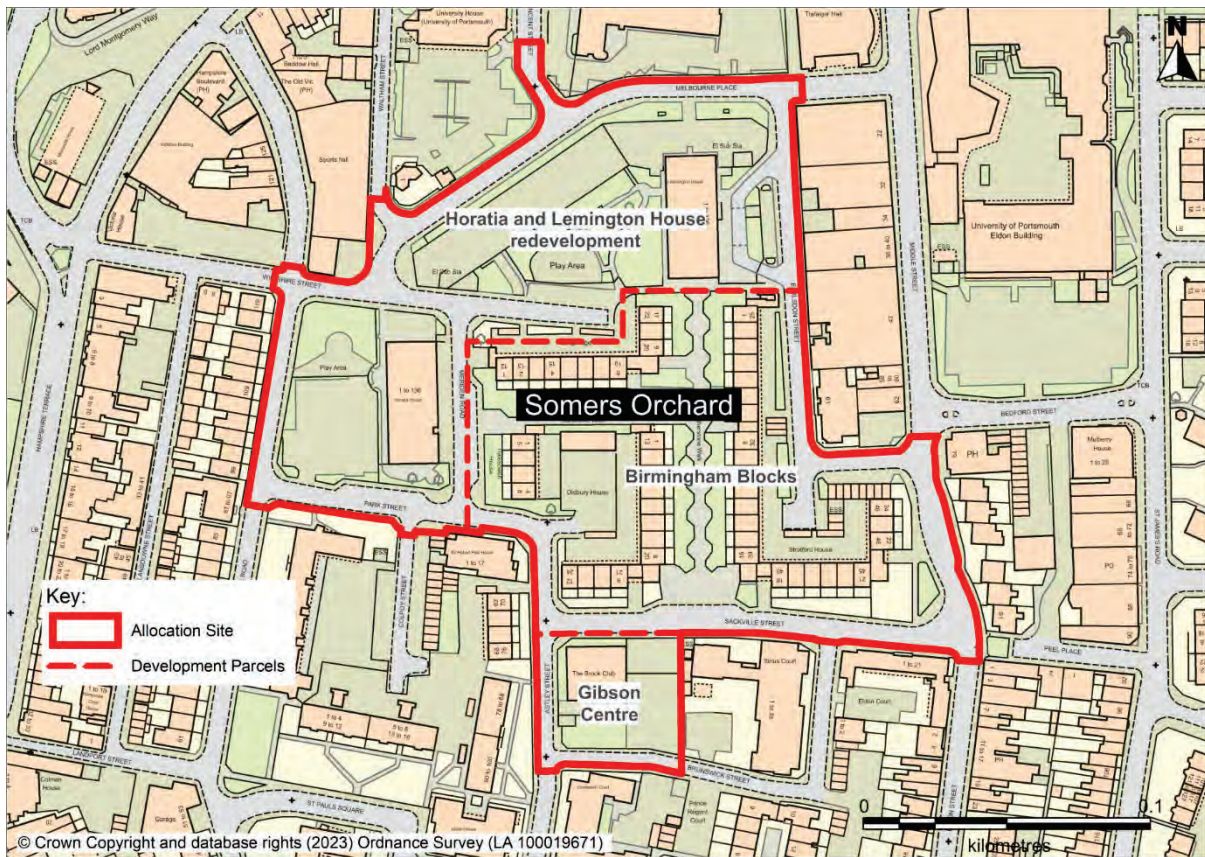


Figure 5.7: Map of Somers Orchard

5.92 There is a reasonably well established network of the secondary streets in the area, however, the quality gets constantly eroded by dominant car parking provision. Most of the north south pedestrian movement occurs on the parallel streets to the estate.

5.93 There is some open green spaces within the site, but it could be improved by integrating them within the public realm, improving the quality and providing better overlooking. The post-war rebuilding of Somerstown resulted in a neighbourhood that is very impermeable with disconnected routes and mixed quality. Such growth established poorly overlooked streets and underused public spaces throughout the neighbourhood.

5.94 The area formed part of the National Model Design Code pilot project that the City Council developed in partnership with the Government, covering the redevelopment of this area and wider Somerstown. The Horatia and Leamington House site is a pilot project for the redevelopment program of buildings with structural issues.

5.95 As part of work to replace cladding at Horatia and Lemington Houses it was found that substantial work was needed to strengthen the buildings. In 2022 Horatia and Lemington Houses were demolished. In addition to the sites of the two former towers, the City Council is also redeveloping the car park parallel to Melbourne Place to create the opportunity for a wider redevelopment within the area. In addition the Gibson Centre to the South is proposed for redevelopment as a secondary phase of development.

5.96 In addition to the two main areas of redevelopment the City Council intends to carry out landscaping works to the areas around Longbridge House, Oldbury House, and Stratford House, collectively known as the 'Birmingham Blocks'. These landscaping works aim to

tie the two portions of the site together and provide wider neighbourhood improvements to the area.



Site Allocation Policy PLP15: Somers Orchard

1. Somers Orchard, as shown on the Policies Map, is allocated for the development of the following uses:

- a) 565 dwellings (293 net gain, taking into account the recently demolished 272 units);**
- b) Approximately 500 sqm commercial space;**
- c) Approximately 440 sqm community space.**

2. Development proposals for the above-named uses will be permitted provided that they meet all of the following site-specific development requirements:

- a) Replaces the 272 affordable homes from Horatia and Lemington Houses with new affordable homes;**
- b) Provides 30% of any net additional homes as affordable homes or in the case of a Build to Rent Scheme provides 20% affordable private rented units;**
- c) Creates new integral open space and landscaping that provides for the needs of the new and existing community and acts to link the space to the wider estate;**
- d) Biodiversity Net Gain of at least 20% is demonstrated and secured in perpetuity (at least 30 years) on site;**
- e) Improves connectivity, permeability and legibility through the development, prioritising safe and accessible cycling and walking;**
- f) Includes tall buildings and high density blocks in order to achieve the densities needed to meet the required level of housing;**
- g) Provides landscaping to enhance the setting of the retained Birmingham Blocks;**
- h) Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritised;**
- i) Takes advantage of the site's sustainable location to provide a reduced car parking ratio; and**
- j) Any new build development proposals for the site must respond positively to the presence of nearby heritage assets.**

Supporting text

- 5.97 The purpose of this policy is to ensure that the development at Somers Orchard, delivers significant amounts of good quality social and private rented housing in a way that integrates with and is a positive addition to the existing community.
- 5.98 Within the site are two main areas proposed for housing. The largest area of housing comprises the site of the two former towers along with Melbourne Place car park has the potential for 519 dwellings and the Gibson Centre redevelopment is expected to deliver a further 46 units. The demolition of the two towers resulted in the loss of 272 dwellings, which been counted in the City Council's land supply position as a loss. Therefore it is expected that the site will deliver a total of 565 (gross) dwellings.
- 5.99 The site is being brought forward by the City Council through its Housing Revenue Account. The scheme re-provides the affordable stock lost through the loss of the two towers (272 units). The majority of the site is therefore being brought forward for Council Housing. In addition to the 272 affordable homes being replaced, the Council will require an additional 30% affordable housing or an additional 20% affordable private rented units if the additional units were to come forward as build to rent in line with policies PLP17 (Affordable homes) and PLP 19 (Housing for specific groups) respectively.
- 5.100 The site currently has a series of landscaped green spaces of low recreational and biodiversity value. Development proposals for the site should provide for enhanced green / open space provision in regard to both biodiversity and recreation value. The schemes landscaping should look to provide a network of complementary accessible spaces for the use of future residents and visitors. The landscape proposals remove unnecessary fencing and re-imagine the area as a somewhere where food growing, play and nature overlap. Proposals should look to create multifunctional spaces providing for the future needs of residents and visitors by including features such as play equipment and green spaces in which people can relax.
- 5.101 The site falls within the City Council's ownership. The Council have indicated that development on PCC owned land should be more aspirational in provision of biodiversity. Development on the site is therefore expected to provide an uplift of 20% Biodiversity Net Gain.
- 5.102 The sites as currently laid out (and much of the wider Somerstown Estate) suffers from poor legibility for users. Proposals should improve the site's permeability and legibility by improving existing connections within the neighbourhood particularly to the north-south along Waltham street and east west along Wiltshire street and Melbourne Place. Proposals should encourage the uses of sustainable transport and calm vehicle traffic by introducing raised tables at road junctions, cycle lanes and wider pedestrian pavements, with pedestrians and cyclists given priority wherever possible. The site is well located for public transport with Portsmouth and Southsea Station in close proximity to the north as well as frequent bus services on both Kings Road/Elm Grove and Winston Churchill Avenue. Proposals that provide a reduced parking standard will be acceptable in this location, however, wheelchair and other accessible parking provision should be made available.

Monitoring and Delivery Framework

| Types & amounts of development | Timescale | Delivery | Monitoring | Triggers & potential actions |
|---|------------------|--|---------------------------------|---|
| 519 Dwellings (Horatia and Lemington) (gross) | 6-10 years | Through the development Management process; working in partnership with Developer, freeholder and leaseholder. | Housing monitoring in the AMR | Ongoing liaison with The developer / The City Council's Housing Revenue Account team. |
| 46 Dwellings (Gibson Centre) (gross) | 6-10 years | Through the development Management process; working in partnership with Developer, freeholder and leaseholder. | Housing monitoring in the AMR | Ongoing liaison with The developer / The City Council's Housing Revenue Account team. |
| Landscaping of the wider allocation site | 6-10 years | Through the development Management process; working in partnership with Developer, freeholder and leaseholder. | Planning Application conditions | Ongoing liaison with The developer / The City Council's Housing Revenue Account team/ Future landscape management team. |

Table 5.7: Monitoring and Delivery Framework for Somers Orchard

Chapter 6: Homes

Introduction

6.1 The first objective of the Imagine Portsmouth 2040 vision is that all our residents and communities live in good homes where they feel safe, feel like they belong and can thrive. Therefore, delivering good homes to meet the needs of the City's growing population is a key component of the Local Plan. The policies in this chapter set the target for housing provision in the City along with requirements for different types of homes including affordable homes, Houses in Multiple Occupation (HMO) and Gypsies and Travellers.

Housing Target

Introduction

6.2 The National Planning Policy Framework (NPPF) requires that Local Planning Authorities should aim to meet as much of their area's objectively assessed housing need as possible, including an appropriate mix of housing types for the local community. Furthermore, Local Planning Authorities should then establish a housing requirement figure, which shows the extent to which their identified housing need can be met over the plan period.

6.3 Since 2018, the NPPF has required Local Planning Authorities to establish the minimum number of homes needed by using the standard method prescribed in national planning guidance. The standard method utilises demographic baseline data derived from 2014-based household projections provided by the Office for National Statistics (ONS).

6.4 The Council commissioned a Housing and Economic Development Needs Assessment (HEDNA)⁹⁴, which forms part of the evidence base for this Local Plan. The HEDNA states that over the plan period 2020–2040, the standard method sets a housing need of 899 homes per year for the City. The HEDNA separately identifies a need for 851 affordable homes per year.

6.5 For context, the need identified through the standard method (899 homes per year) represents a significant increase from the housing requirement set in the Portsmouth Plan Core Strategy (2012) of 420 homes per year and from past delivery rates of housing. Past delivery rates of housing net completions (excluding C2 completions) in the City between 2011 and 2022 has averaged 313 homes per annum while in the last five years (2018-2023) this has fallen to 152 homes per annum.

6.6 The HEDNA also assessed data relating to demographic trends and economic growth scenarios that point to Portsmouth's housing need being much lower than the standard method. This is due to household and population growth being far weaker than was projected in the 2014-based projections; analysis of past housing completions does not point to this lower growth being attributed to reduced housing delivery. The HEDNA found that an estimate of housing need based on trend-based population projections points to a need of up to 655 dwellings per annum. If this is set against job growth scenarios then a housing need ranging from 431 to 634 dwellings per annum is

⁹⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

produced. These alternative analyses of housing need suggest that actual housing need for Portsmouth is in a downward direction to levels which are clearly below the standard method figure. It is not, however, definitively clear that exceptional circumstances exist for the Local Plan to adopt a housing need figure lower than the standard method.

6.7 To meet the full housing need set by the standard method of 899 homes per year is extremely difficult in the context of Portsmouth and its geography. Portsmouth is a physically compact city with many constraining factors, including its wealth of nature and heritage designations, that limit options for development growth. The reality is that land availability and housing delivery in the City is a major challenge, which means that the Local Plan has an important role to play in balancing the wide range of competing development needs and the need to protect or enhance the quality of the environment, in order to plan for the long-term sustainable growth of the City. Despite this challenge, however, the Council has sought to plan positively to establish whether a level of housing delivery could be achieved that aims to close the gap between the identified level of housing need and past delivery rates.

6.8 The Plan's Development Strategy seeks to maximise the development potential of developable sites within the City. Therefore, the Council has conducted a thorough and robust assessment of the various sources of housing supply that can then be used to establish a realistic capacity-based housing requirement target for the Local Plan. The sources of housing supply are as follows and are also set out in Table 6.1.

- Identifying strategic sites and allocations within the City that have significant capacity to contribute towards the identified housing need;
- Identifying through the Housing and Economic Land Availability Assessment (HELAA)⁹⁵ non-strategic sites that have capacity to deliver five homes or more. This also takes into account a 'non-implementation discount' (15%) that provides a pragmatic view of the potential delivery of sites included in the HELAA by taking into account the historic difference between the number of homes permitted and the number of homes that were actually built;
- Identifying through robust analysis of past trends the expected contribution from small windfall sites (sites with capacity of less than five dwellings);
- Identifying the contribution arising from student accommodation and other specialist and communal accommodation, including Houses in Multiple Occupation (HMOs);
- Including sites that have been completed between 2020 to 2023;
- Including sites with extant planning permission or have a resolution to grant planning permission as of 31 March 2023. This includes a 'non-implementation discount' (15%) to take into account the historic difference between the number of homes permitted and the number of homes that were actually built;
- Agreeing the contribution towards Portsmouth's housing need to be met by neighbouring local authorities through the 'Duty to Cooperate' although this is not included in the final housing requirement figure.

⁹⁵ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/02-PCC_Housing-and-Employment-Land-Availability-Assessment_2023-Report_FINAL-latest-version-for-CDL.pdf

Table: Sources of new homes in Portsmouth

| Source | | No of Dwellings (net) (in plan period) |
|---|---|---|
| Net completions (sites with capacity of 5 or more dwellings) 2020-23 (A) | | 305 |
| Permissions outstanding as of 31 March 2023 (net) (A) (B) | | 1,353 |
| - Less 'Non-implementation discount' (15%) | | (203) |
| Strategic sites (7,155): | City Centre | 4,158 |
| | St James' and Langstone Campus | 417 |
| | Tipner West & Horsea Island East (C) | 814 |
| | Tipner East | 1,056 |
| | Fratton Park & Pompey Centre | 710 |
| Allocations (1,511): | Port Solent | 500 |
| | St John's College | 212 |
| | Fraser Range | 134 |
| | The News Centre, Hilsea | 100 |
| | Somers Orchard, Somerstown | 565 |
| Sites identified from 2023 HELAA: (A) | Small/medium sites <1ha with capacity for 5 or more dwellings | 1,543 |
| | Sites >1ha with capacity for 5 or more dwellings | 457 |
| | - Less 'Non-implementation discount' (15%) | (300) |
| Small sites windfall (sites with capacity of <5 dwellings) (D) | | 1,007 |
| Equivalent contribution from HMOs (E) | | 731 |
| Equivalent contribution from C2 accommodation completions (F) | | 44 |
| Target for new homes in Portsmouth 2020 - 2040 | | 13,603 |
| Duty to Cooperate contribution from neighbouring local authorities | | 800 |
| Target for new homes for Portsmouth including the Duty to Cooperate contribution from neighbouring local authorities | | 14,403 |
| Footnotes: | | |
| (A) Includes equivalent dwellings from student accommodation development | | |
| (B) Comprising of permissions arising from City Centre sites, previous HELAA sites, and other non-HELAA sites; does not include HMO permissions, which are accounted for in (E) | | |
| (C) The range allocated for Tipner West & Horsea Island East is 814-1,250 homes and the lowest figure of the range is fed into the housing target. The lower number provides the minimum number of homes required as part of the City Deal whilst the upper number provides certainty for the HRA in terms of impact on the integrity of the national and internationally designated sites. | | |
| (D) Including net completions 2020/21-2022/23; does not include HMO completions or student accommodation development | | |
| (E) Including net permissions 2020/21-2022/23: the ratio applied is 1.8 bedrooms to 1 C3 dwelling | | |
| (F) Including gross completions 2020/21-2022/23; the ratio applied is 1.8 bedrooms to 1 C3 dwellings. Does not include student accommodation development | | |

6.9 Based on the housing figures set out in Table 6.1, Policy PLP16 therefore sets a housing requirement target for Portsmouth of 13,603 new homes from 2020 to 2040 or approximately 680 new homes per year. This figure is a 'capacity-based' target based on the level of housing that can be realistically achieved within the plan period having regard to Portsmouth's constraints, land availability, and development capacity. Nevertheless, the Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply, whilst being pragmatic in its assessment of delivery from permitted sites and HELAA sites through the application of a 'non-implementation discount'.

6.10 Whilst the housing requirement target does not meet the standard method housing need in full, it does meet and exceed the level of housing need that may actually exist as assessed through the HEDNA of up to 655 dwellings per annum (if solely using the trend-based population projections) or the range of 431 to 634 dwellings per annum (if set against job-growth scenarios). The NPPF states that the outcome of the standard method is an advisory starting point for establishing a housing requirement. The City Council therefore considers that the housing target set in Policy PLP16 is both justified and consistent with Government policy.

6.11 Further information can be found in the Council's Housing background paper⁹⁶.

Strategic Policy PLP16: Housing Target



1. The Council will make provision for at least 13,603 net additional homes during the Plan period of 2020-2040 with a net annual provision of approximately 680 homes each year. These homes will be provided from the following sources with further details set out in Table 6.1 of this Local Plan:

- a) **Completions 2020-2023 (net)**
- b) **Outstanding permissions as of 31 March 2023 (net) (with a 15% non-implementation discount applied)**
- c) **Strategic sites in this Local Plan**
- d) **Allocations in this Local Plan**
- e) **Sites identified from the 2023 HELAA with a 15% non-implementation discount applied, comprising of:**
 - i. **Small/medium sites <1ha with capacity for 5 or more dwellings as identified in Appendix 2 of this Local Plan**
 - ii. **Sites >1ha with capacity for 5 or more dwellings as identified in Appendix 3 of this Local Plan .**
- f) **Small sites windfall with capacity of <5 dwellings**
- g) **Equivalent contribution from HMOs**
- h) **Equivalent contribution from C2 accommodation**

⁹⁶ <https://www.portsmouth.gov.uk/newlocalplanevidencedocl>

2. A further contribution to unmet housing need will also be sought from neighbouring local authorities through the Duty to Cooperate. This includes 800 homes allocated in the Fareham Local Plan.

3. Neighbourhood Plans that allocate additional land for housing will be supported by the Council providing that they meet local housing need and are in general conformity with the strategic policies of the Portsmouth Local Plan.

Supporting Text

6.12 An important element of housing delivery in the City is the allocation of strategic sites and allocations. The strategic sites and allocations are in chapters 4 and 5 of this Local Plan respectively. Each site has their own policy setting out specific development requirements.

6.13 The HELAA is a comprehensive assessment of potential housing sites in Portsmouth and identifies all deliverable and developable sites that could accommodate five or more new homes. Although the HELAA identifies sites that are deemed deliverable or developable, it in itself does not allocate sites nor grants planning permission for development; however, it does identify the principle of development and uses of sites. The 2023 HELAA identified 72 sites deemed deliverable or developable that could output 2,000 new homes in the plan period. As previously mentioned, however, the actual supply figure (1,700 homes) included in this policy takes into account a 'non-implementation discount' (15%) that provides a pragmatic view of the potential delivery of sites included in the HELAA by taking into account the historic difference between the number of homes permitted and the number of homes that were actually built.

6.14 Paragraph 70a of the NPPF states that local planning authorities should "identify... land to accommodate at least 10% of their housing requirement on sites no larger than one hectare...." The Council have used the 2023 HELAA as the basis for identifying such sites (which have capacity for 5 or more dwellings) and have identified that the contribution towards the housing supply from sites less than 1ha would be 1,543 homes over the plan period. This exceeds 10% of the housing requirement.

6.15 Windfall sites are defined in the NPPF as sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available. Portsmouth has relatively few opportunities for larger scale development. Therefore, smaller scale infilling and change of use developments have historically formed a significant and consistent part of the overall supply of housing land in Portsmouth. From an analysis of past trends on completions for any windfall sites that yielded between 1 to 4 dwellings, it is considered that an estimate of 54 dwellings per annum delivered through windfall small sites represents a justified estimate of delivery during the Plan period.

6.16 HMOs play a key part in housing delivery within the City meeting the needs of those that require a more affordable housing option. The Council includes HMOs in its land supply data given the large amount being permitted/delivered over the years and the role they play in helping to meet the City's housing need. Through an analysis of historic HMO permissions data, it is concluded that the equivalent of 37 dwellings per annum can be expected to be delivered during the Plan period.

6.17 The Council has been in discussions with neighbouring authorities through the Duty to Cooperate, both bilaterally and through the Partnership for South Hampshire (PfSH). The Council has a close relationship with Havant Borough Council where a large proportion of the Council's housing stock is located as well as reciprocal nomination rights for those on the housing register. The Council also has a partnering relationship with Gosport Borough Council. At this time, a contribution of 800 homes from Fareham Borough Council has been agreed, which is accounted for in the Fareham Local Plan 2037.

6.18 The NPPF promotes the supporting role that Neighbourhood Plans can play in delivering the strategic policies of the Local Plan, including housing targets, through allocating sites within their respective neighbourhood area. At the current time, the Milton Neighbourhood Plan is the only such plan that has been formally made and adopted in Portsmouth. However, in the future and during the Local Plan period, there may be further Neighbourhood Plans prepared for adoption and, therefore, this policy recognises that these may make provision for additionally identified housing site allocations that are not included in this Local Plan.

Affordable Homes

Introduction

6.19 The provision of affordable homes is a key and pressing issue for the City. The HEDNA analysis identifies a notable need for affordable housing in the City. However, it is difficult to link the need for affordable housing to the overall housing need; indeed, there is no justification for trying to make the link. Put simply, the two do not measure the same thing. Furthermore, when considering affordable need, it has to be noted that many households already have housing, and do not therefore generate an overall net need for additional homes. Further issues arise as the need for affordable housing is complex, and additionally the extent of concealed and homeless households needs to be understood, as well as the role played by the private rented sector. Nevertheless, the provision of affordable housing should be maximised wherever possible and at every opportunity to support those who cannot afford to rent or secure a property on the open market in the City.

6.20 A Viability Study⁹⁷ was carried out to test the impact of all potential requirements on new residential development including affordable housing provision, Community Infrastructure Levy (CIL) payments, and environmental mitigation set through the new Local Plan, to understand whether the cost of these requirements would make development financially unviable. Not all development would have the same viability position and there is significant variation between different areas of the City and with different site circumstances. To set a requirement for the delivery of affordable housing as part of new residential scheme, a range of affordable housing thresholds were viability tested (0% – 40%)⁹⁸. Within that range of thresholds, a split of tenures was used, with 70% to be provided as affordable/social rent and 30% to be provided as low-cost home ownership.

⁹⁷ <https://www.portsmouth.gov.uk/newlocalplanevidencedoce>

⁹⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/PCC-Viability-26.10.20-Report-and-Appendicies_compressed.pdf

- 6.21 On balance, the Council considers it preferable to set an affordable housing target that is ambitious for the City, reflecting the priority to provide affordable housing for people in need. Therefore a 30% threshold has been selected, but with the flexibility of being subject to viability testing on a case by case basis.
- 6.22 Affordable housing can be delivered through a number of different products, including homes for affordable or social rent, discounted market sales, First Homes, shared ownership and Rent to Buy.
- 6.23 The HEDNA analysis suggests there will be a need for both social and affordable rent housing. The latter will be suitable particularly for households who are close to being able to afford to rent privately and possibly also for some households who claim full Housing Benefit. However, it is clear that social rents are more affordable and could benefit a wider range of households.
- 6.24 The Government see a continued role for Shared Ownership⁹⁹ in meeting affordable need, providing for additional investment into the housing sector through the new Affordable Homes Programme. As part of the new programme, some changes to the Shared Ownership scheme were introduced in order to help more people get onto the property ladder, including measures such as setting the initial share to a minimum of 10%, and introducing a 1% gradual 'staircasing' model to allow owners to increase their equity share over time.
- 6.25 The Council also see Shared Ownership as an important and advantageous form of affordable home ownership product for the City that meets an affordable need, since a lower deposit (for the equity share) to secure a property is likely to be required compared to other tenures such as First Homes. Additionally, the rental part of the Shared Ownership model can be subsidised by a Registered Provider, helping to keep monthly payments low for occupiers.
- 6.26 For Portsmouth, the Council considers that First Homes are not required to be specifically provisioned for as part of the delivery of affordable home ownership. This is based on evidence from the HEDNA and the Local Plan Viability Study, whereby the delivery of First Homes could detrimentally impact the delivery of other affordable tenures that the Council deem as priorities for the City namely affordable and/or social rent and Shared Ownership. The market discount that is applied to First Homes is a cost that would need to be borne by a developer. The Viability Study has found that at the recommended minimum threshold of 25% of affordable homes as First Homes and down to a modelled threshold of 5%, this would give rise to significant viability issues for developers to deliver a site for development, thus opening up the risk of having reduced or no affordable homes in the other tenures being provisioned for in development proposals due to viability reasons.
- 6.27 In addition, the HEDNA found that there is evidence that there is only a small gap in the incomes needed to buy or rent a home in the City, and therefore points to a very limited need for First Homes. Indeed, the income required and upfront capital to purchase a First Home and to maintain the monthly cost of ownership would be at a level much higher than that required for Shared Ownership homes, and therefore it would appear that First Homes do not offer a genuine 'affordable' alternative to market homes

⁹⁹ Government launched a 'New Model for Shared Ownership' in early 2021 (following a 2020 consultation)

compared to Shared Ownership, which has been a proven and in-demand form of affordable tenure for the City. It is for these reasons that the Council will not seek for specific provision to be made for First Homes in development proposals.

6.28 A further affordable option is Rent to Buy; this is a Government scheme designed to ease the transition from renting to buying the same home. Initially (typically for five years) the newly built home will be provided at the equivalent of an affordable rent (approximately 20% below the market rate). The expectation is that the discount provided in that first five years can be saved by occupiers in order to put towards a deposit on the purchase of the same property. Rent to Buy can be advantageous for some households as it allows for a smaller step to be taken on to the home ownership ladder. At the end of the five-year period, depending on the scheme, the property is either sold as a shared ownership product or to be purchased outright as a full market property. If the occupant is not able to do either of these then the property is vacated.

Strategic Policy PLP17: Affordable Homes

- 1. Development proposals for major development, where a gross number of 10 or more residential dwellings will be provided (or the site has an area of 0.5ha or more) will be permitted where they:**
 - a) Make on-site provision for a minimum of 30% of the total residential dwellings as affordable homes;**
 - b) Provide the tenure mix of the affordable homes as 70% affordable rent and/or social rent, and 30% as another affordable route to home ownership (including shared ownership or discounted market sales housing); and**
 - c) Are indistinguishable in design and appearance from the open market houses and shall normally be "pepper-potted" around the site.**
- 2. Where there is an indication that a site or development has been artificially split in order to avoid policy requirements by being below the dwelling or site size threshold identified above, the Council will consider whether it would be appropriate to apply the policy requirements to each of the smaller sites individually, irrespective of their number of dwellings or site area, in order to secure the delivery of affordable housing in accordance with this policy.**
- 3. Where development proposals do not meet the policy requirements for affordable housing the applicant will be required to:**
 - a) Provide an open book viability assessment, that will be independently reviewed on behalf of the Council at the cost of the applicant, demonstrating that the proposed affordable homes provision has been maximised and all other options have been fully explored; and**
 - b) Demonstrate that the proposal contributes towards creating mixed and balanced communities.**
- 4. Where development proposals have been permitted that do not meet policy threshold requirements on affordable housing, the development will be subject to:**

- a) **An Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or another period agreed by the Council);**
 - b) **A Late Stage Viability Review which is triggered when 75% of the homes in a scheme are sold or let (or another period agreed by the Council); or**
 - c) **Mid Term Reviews prior to implementation of phases for larger schemes.**
- 5. On site-provision of new affordable homes will be prioritised. Where this has been robustly demonstrated to be neither feasible nor viable, then off-site provision or an appropriate financial contribution in lieu to provide affordable housing will be accepted where it can be robustly justified. Off-site provision should be through provision on an alternative site within the City.**
- 6. Planning applications should where relevant have regard to the Providing Affordable Housing in Portsmouth¹⁰⁰ guidance (or future equivalent) and the Housing Standards SPD¹⁰¹ (or future equivalent).**

Supporting Text

- 6.29 The purpose of this policy is to set out the minimum target number of homes that should be delivered as affordable homes for major development schemes involving residential use where either:
- a gross number of 10 or more residential dwellings will be provided; or the site has an area of 0.5ha or more.
- 6.30 The policy applies to all major development where ten or more residential dwellings (gross) are proposed, or the site has an area of 0.5ha or more, including mixed use schemes, specialist and supported housing, such as for older people and communal and co-living schemes, and other forms of residential development where relevant.
- 6.31 The requirement for affordable homes provision for Build to Rent schemes is included in Policy PLP19.
- 6.32 The Council will consider whether a site or development has been artificially split in order to avoid policy requirements. In such cases, the Council will apply the policy requirements to each of the smaller sites individually.
- 6.33 The target threshold and tenure mix of affordable homes will be calculated from the total residential dwellings of the site. For the purpose of this policy, residential dwellings are dwellings within Use Class C3. The target threshold is a minimum of 30% of the total residential dwellings are to be affordable homes, with the resulting quantum then used to work out the percentage mix required for the various tenures. To illustrate how this works, Table 6.2 is a worked example for a hypothetical proposed scheme delivering 100 homes.

¹⁰⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-providing-affordable-housing-in-portsmouth.pdf>

¹⁰¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/04/Housing-Standards-Supplementary-Planning-Document.pdf>

Table 6.2: Worked example showing affordable housing provision

| Tenure of a hypothetical 100 homes scheme | TOTAL |
|--|-----------------|
| 70% of total homes as market homes | 70 homes |
| 30% of total homes as affordable homes | 30 homes |
| Of which: | |
| 70% of the remaining AH homes (23 homes) as general needs affordable rent and/or social rent | 21 homes |
| 30% of the remaining AH homes (23 homes) as another route to affordable home ownership | 9 homes |

6.34 The overall affordable housing threshold and the affordable tenure mix are the minimum targets the Council will expect development to meet. Where calculations yield decimal numbers, for calculating the minimum 30% threshold the figure should be rounded up. For calculating the breakdown of affordable tenure, figures should be rounded down or up but with bias towards increasing the overall provision of affordable homes and appropriate tenures, especially affordable rent and/or social rent affordable homes since there is a high level of need in the City for these types of homes. In the example in Table 6.2, the figures have been rounded up or down in order to increase the overall provision of affordable and/or social rent.

6.35 The HEDNA recommended that the Council should not have a rigid policy for the split between social and affordable rent housing, although the analysis is clear that both tenures and particularly social rented housing are likely to be required. Social rents should therefore be prioritised where delivery does not prejudice the overall delivery of affordable homes.

6.36 The Council will also seek to meet the need for affordable housing by providing greater proportions of affordable housing (up to 100%) on its own developments and land within its ownership, where appropriate, through the Housing Revenue Account and in partnership with Registered Social Landlords.

6.37 Developers/applicants should seek to engage with the Council at the earliest opportunity in order to discuss what would be the most appropriate affordable homes provision for a site/scheme.

6.38 Schemes that do not meet policy threshold requirements will be required to submit detailed viability assessment, which will be scrutinised and treated transparently. In such cases, the Council will commission an independent review of the submitted viability assessment, for which the developer/applicant will bear the cost.

6.39 Where a scheme that has been permitted but did not meet the relevant threshold requirements as set out in this policy, it will be subject to comprehensive review mechanisms secured by planning condition(s) and/or legal agreement. This is to ensure that affordable housing contributions can be identified if a development's viability improves over time. The definition of 'larger schemes' that will be subject to Mid Term Reviews will be at the Council's discretion and will depend on the nature and scale of the proposal.

6.40 The Council's Planning and Housing departments have produced the Providing Affordable Housing in Portsmouth¹⁰² guidance and the 'Housing Standards SPD', both of which developers/applicants should have relevant regard to or to any future equivalent guidance.

Housing Mix and Housing For Specific Groups

Introduction

6.41 There is a need to plan for and deliver a variety of homes throughout the City to cater for its population, provide a choice of high quality homes and create inclusive, mixed and sustainable communities.

6.42 The HEDNA, which forms part of the evidence base for this Local Plan, has helped inform what the need is in Portsmouth for the various mix and types of housing through analysing and modelling relevant data and statistics.

6.43 The housing mix and type requirements for the City also need to be deliverable. Viability assessment at the plan-making stage has been undertaken to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine overall deliverability and effectiveness of the Local Plan.

6.44 Policy PLP18 sets out what should be delivered as part of any residential development proposal in terms of housing mix, family homes, and accessible and adaptable homes. Policy PLP19 sets out what housing types will be supported and the criteria development proposals will be assessed against.

Housing Mix

6.45 Housing mix is mainly focused on the sizes of homes that are required in different tenure groups, which then implicates how new developments should be delivered to contribute towards meeting local housing need.

6.46 The provision of more family housing in the city will offer more local choice to families who otherwise may have to look outside the City boundaries for a suitable home to meet their needs. Opportunities should be taken for new residential development to provide a proportion as family housing. However, it is recognised that Portsmouth is part of a wider housing market area which includes neighbouring districts/boroughs which are less constrained in nature and have the land capacity to provide a much larger mix of family sized properties within new developments. It is also widely recognised with neighbouring authorities that there is cross-commuting within the Portsmouth housing market area, which includes all of Portsmouth, Gosport and Havant as well as the eastern wards of Fareham Borough, the southern wards of Winchester District and part of East Hampshire District. There is also relocation across the area due to people going through different stages of life.

6.47 There is also an identified need for larger family-sized affordable and social rented houses, the provision of which would also enable the freeing up of existing housing stock for those on the Council's Housing Register and would allow for families to move into homes sufficient in size to meet their needs.

¹⁰² <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-providing-affordable-housing-in-portsmouth.pdf>

6.48 The HEDNA has looked at a range of statistics in relation to families (generally described as households with dependent children) and then looked at how the number of households in different age groups are projected to change in the future. From this, a recommended housing mix based on dwelling sizes for the different housing sectors has been developed, as shown in Table 6.3.

Table 6.3: Recommended housing mix

| | Market | Affordable home ownership | Affordable housing (rented) | |
|-------------|--------|---------------------------|-----------------------------|---------------|
| | | | General needs | Older persons |
| 1-bedroom | 10% | 25% | 20% | 55% |
| 2-bedrooms | 35% | 40% | 30% | 45% |
| 3-bedrooms | 35% | 25% | 30% | |
| 4+ bedrooms | 20% | 10% | 20% | |

6.49 In terms of the provision of accessible and adaptable homes and wheelchair user dwellings, which is needed to meet the housing needs of a range of people in the community including the elderly and those with disabilities and mobility impairments, the HEDNA analysis responds to national policy guidance on 'Housing for Older and Disabled People'¹⁰³ and includes an assessment of the potential requirements for housing to be built to Part M4(2) 'Accessible and Adaptable Dwellings' and Part M4(3) 'Wheelchair User Dwellings' of the Building Regulations.

6.50 The provision made to meet Part M4(3) can be two types (2a or 2b):

- 2a - To allow a simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs. Dwellings will be defined as 'wheelchair adaptable'; or
- 2b - To meet the needs of occupants who use wheelchairs. Dwellings will be defined as 'wheelchair accessible'.

6.51 Wheelchair adaptable dwellings are intended to be capable of becoming wheelchair accessible through easy adaptations that do not require structural or service modifications, or moving walls. Wheelchair accessible dwellings are intended to be readily usable by wheelchair users at the point of completion.

6.52 A Local Authority only has the right to request for dwellings to be designed as 'wheelchair accessible' where the Local Authority is responsible for allocating or nominating people to live in those dwellings. A Local Authority can, however, request that market homes are designed to be 'wheelchair adaptable'.

6.53 The HEDNA analysis shows that the projected change (to the year 2040) shown in the number of people with disabilities in the City provides clear evidence to justify delivering M4(2) 'accessible and adaptable' homes, subject to viability and site suitability. Furthermore, the Government has recently reported in a consultation on changes to the way the needs of people with disabilities and wheelchair users are planned for as a result of concerns that, in the drive to achieve housing numbers, the delivery of housing

¹⁰³ <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

suiting the needs of households with disabilities is being compromised on viability grounds. The key outcome to the consultation was that the 'Government is committed to raising accessibility standards for new homes... the government response sets out our plans to mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes'. This change is due to be implemented through a change to the Building Regulations.

6.54 The Development Viability Assessment (2020) highlighted that the requirement for 100% of homes to meet M4(2) might present a viability issue, though is mainly an issue for modelled typologies in lower value areas. Most of the modelled typologies in the medium and higher value areas may be able to absorb the cost. However, given the future changes to the Building Regulations to mandate that all new homes should meet M4(2) requirements, housebuilders will now be moving to 'price in' this cost in future house-building projects.

6.55 For M4(3) dwellings, the HEDNA recommended that 5% of all new market homes to be 'wheelchair adaptable' and 10% of affordable homes to be 'wheelchair accessible'. These figures reflect the level of need for the City.

Development Management Policy PLP18: Housing Mix

1. Development proposals for residential development, including as part of a mixed-used development, will be permitted where they provide a mix of dwelling sizes to meet projected future household needs for the City, in accordance with the following:

a) For any market homes element, to the following approximate mix:

| | |
|------------------------------|------------|
| 1-bedroom dwellings: | 10% |
| 2-bedroom dwellings: | 35% |
| 3-bedroom dwellings: | 35% |
| 4+ bedroom dwellings: | 20% |

b) For any affordable home ownership element, to the following approximate mix:

| | |
|------------------------------|------------|
| 1-bedroom dwellings: | 25% |
| 2-bedroom dwellings: | 40% |
| 3-bedroom dwellings: | 25% |
| 4+ bedroom dwellings: | 10% |

c) For any general need affordable rented homes element, to the following approximate mix:

| | |
|------------------------------|------------|
| 1-bedroom dwellings: | 20% |
| 2-bedroom dwellings: | 30% |
| 3-bedroom dwellings: | 30% |
| 4+ bedroom dwellings: | 20% |

d) For any older persons affordable rented homes element, to the following approximate mix:

| | |
|--|------------|
| 1-bedroom dwellings: | 55% |
| 2, 3, and 4+ bedroom dwellings: | 45% |

2. **Planning permission will be granted for an alternative housing mix provided that:**
 - a) **Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or**
 - b) **It is robustly demonstrated that site-specific considerations necessitate a different mix.**
3. **Development proposals will be permitted where:**
 - a) **All homes are built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2);**
 - b) **At least 5% of all new market homes to be built as 'wheelchair adaptable' dwellings to meet the requirements of Building Regulations M4(3) 2a;**
 - c) **At least 10% of all affordable homes which the Council has nomination rights to are to be built as 'wheelchair accessible' dwellings to meet the requirements of Building Regulations M4(3) 2b.**
4. **Planning applications should, where relevant, have regard to the Council's Design Guide for Wheelchair Accessible Housing¹⁰⁴ or future equivalent.**

Supporting Text

6.56 The purpose of this policy is to set out what should be delivered in the housing mix as part of any residential development proposal relating to family homes and accessible and adaptable homes.

6.57 The policy should be interpreted as setting out the breakdown of the recommended mix of homes within each tenure of a proposed scheme. Table 6.4 shows the recommended mix of dwelling sizes for a hypothetical proposed scheme of 100 homes, with 70% as market homes and 30% as affordable homes with an affordable tenure split as 70% general needs affordable rented and 30% affordable home ownership in line with Policy PLP17.

6.58 Where calculations yield decimal numbers, figures should be rounded down or up but with bias towards increasing the overall number of 3+ bedroom dwellings, namely family-sized dwellings, which is demonstrated in Table 6.4.

Table 6.4: Worked example showing housing mix

| Dwelling size | Market homes | Affordable home ownership | General needs affordable rented | TOTALS |
|----------------------|---------------------|----------------------------------|--|---------------|
| 1-bedroom | 7 | 2 | 3 | 12 |
| 2-bedrooms | 24 | 3 | 6 | 33 |
| 3-bedrooms | 25 | 3 | 7 | 35 |
| 4+ bedrooms | 14 | 1 | 5 | 20 |

¹⁰⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-design-guide-for-wheelchair-accessible-housing.pdf>

| | | | | |
|---|-----------|----------|-----------|------------|
| TOTAL NO. DWELLINGS | 70 | 9 | 21 | 100 |
| N.B. Tenure split applicable for the above is as follows: 70% of total homes as market homes = 70 homes 30% of total homes as affordable homes (AH) = 30 homes 70% of the AH homes as general needs affordable rented = 21 homes 30% of the AH homes as affordable home ownership = 9 homes | | | | |

6.59 Given the nature of the City and the needs identified, the HEDNA analysis suggests that the majority of new homes delivered will likely be flats rather than houses. However, consideration will also need to be given to site specific characteristics and circumstances which may lend them to being developed through a particular typology or a mix of typologies. Therefore, in considering an alternative mix for an individual development site, regard will be given to the nature of the site and character of the area and up-to-date evidence of local need to determine whether it is justified. This will be for a developer or applicant to provide robust evidence and the rationale to justify the proposed approach.

6.60 There is no clear demand for bungalows and, realistically, significant delivery of this type of accommodation is unlikely and indeed an inefficient use of land in a highly constrained City. However, it is the case that providing bungalows where suitable might be attractive for wheelchair users or for older person households downsizing, which may in turn help to release larger family-sized accommodation to be available for families.

6.61 The Council would expect all development to be able to deliver accessible and adaptable housing, and wheelchair adaptable or accessible housing to the mix as set out in this policy. Nevertheless, it is acknowledged that site suitability, for example, site characteristics and technical constraints, may necessitate a different approach to the mix. This should be robustly justified by applicants or developers should any development proposal not comply with this policy.

6.62 Developers of affordable housing should liaise with the Council at the earliest opportunity to discuss the identified need for wheelchair accessible homes and the suitability of the site to address this particular need. Developers need to have due regard to the Council's Design guide for wheelchair accessible housing¹⁰⁵ guidance.

Housing For Specific Groups

6.63 This policy sets out what types of housing for specific groups will be supported and the criteria development proposals will be assessed against. The policy addresses the following housing types and specific groups:

- Self-build and custom-build homes;
- Older persons' housing;
- Specialist and supported housing, including children's and young people's housing;
- Purpose built student accommodation;
- Build to Rent homes;
- Communal or co-living homes;
- Service personnel and service family accommodation.

¹⁰⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-design-guide-for-wheelchair-accessible-housing.pdf>

6.64 Houses in Multiple Occupation (HMOs) is addressed separately in Policy PLP20.

6.65 The HEDNA examined the need of these different groups and, where necessary, made policy recommendations on how the Local Plan can seek to meet the need.

Self-build and custom-build

6.66 The Self-Build and Custom Housebuilding Act 2015 requires that Local Planning Authorities keep a register of individuals and associations, who are seeking to acquire serviced plots of land for their own self-build and custom housebuilding projects. National policy requires Councils to promote development of a good mix of small and medium sized sites, and seek opportunities to support sites for community led development, including self-build and custom-build homes.

6.67 The 2015 Act (as amended) includes a requirement for the Council to grant sufficient planning permissions to meet the demand identified on the Register, although this does not need to meet the requirements of the specific applicants. The need for self and custom build accommodation also needs to be balanced with the needs of general housing and other specific groups in the context of a land supply which is unlikely to meet overall needs.

6.68 Turning to the level of demand, during the period of 01 April 2016 to 30 October 2022, there was a total of 47 registered expressions of interest in a serviced plot of land received by the Council. The number of individuals expressing an interest has been evidently declining over time. The local connection test that was introduced on 01 March 2018 may have had an impact in the reducing registration numbers.

Specialist and supported housing, including older persons housing, and children's and young people's housing

6.69 The HEDNA consulted a range of data sources and statistics to consider the characteristics and housing needs of the older person population in the City.

6.70 The data shows that Portsmouth has a younger age structure and the older person population shows high proportions of owner-occupation, and particularly outright owners who may have significant equity in their homes; 66% of all older person households are outright owners.

6.71 The older person population is projected to increase notably moving forward. An ageing population means that the number of people with disabilities is likely to increase substantially. Key findings include:

- a 39% increase in the population aged 65+ potentially accounting for around 66% of total population growth;
- a sufficient supply of housing units with support, sheltered/retirement housing, in both the market and affordable sectors;
- a need for around 770 additional housing units with care, for example extra-care, with a split between market and affordable housing; and
- a need for additional residential and nursing care bedspaces;

6.72 Concerning the needs for children and young people housing, data as of March 2017 show that there were 358 children in care, an increase of 11% from the previous year, of

which 4% resided in care homes. This equates to 0.82% children in care compared to the national rate was 0.6%, of which 8% were in care homes. This means the City has a slightly higher percentage of looked after children but a below average number in care homes.

6.73 The population projections linked to the standard method shows there will be a modest increase in those aged under 18 of around 1,200 between 2021 and 2040 (from 41,400 people to 42,600), although past trends has shown there was a decline in this age band (the number of people declining by 1,100 over the 2011-21 period). From this perspective there is likely to be very limited need for additional placements. However, if trends in increasing demand continue there will still be a need despite limited population change.

6.74 Furthermore, the national and City Council policy is to ensure that children are firstly cared for at home and secondly within a foster home. The success of this strategy ultimately determines whether there is a need for purpose-built children's care homes in the City.

6.75 Portsmouth is also home to a number of other vulnerable groups that require specialist forms of housing, which sometimes have to be met by out-of-city placements where suitable provision isn't available in the City. Vulnerable people can include those who are homeless, people with physical or mental, health issues, people with learning difficulties, people with alcohol or drug problems, young people at risk, ex-offenders and those at risk of domestic violence. A stable environment enables people to have greater independence and a chance to improve their quality of life.

Purpose Built Student Accommodation

6.76 The University of Portsmouth is the only higher education establishment in the City and is an important contributor to the local economy. In the 2022/23 academic year, the University of Portsmouth had 24,596 students of which 83% were full-time.

6.77 The City has seen significant private sector development of purpose built student accommodation (PBSA) in recent years and the 2021 Census shows 26% of students living in communal establishments for university students. Much of the recent provision of student accommodation has been delivered by the private sector as opposed to the University, though the University has nomination rights to accommodation within certain PBSAs.

6.78 A further 42% live in all student households (or HMOs) which is higher than the national average (27%). In 2021/22 there were around 8,000 rooms being advertised for students in the City, although the supply is rapidly falling and affordability worsening.

6.79 The University is planning to grow student numbers by a minimum of 10% over the next three to four years. Given this planned growth, and the falling supply of HMOs and local affordability issues within the student housing rental market, the Council will continue to support further PBSA development provided that these are at the more affordable end of the range.

Build to Rent homes

6.80 Build to Rent housing is a distinct type of housing within the private rental sector. The NPPF defines Build to Rent development as 'purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.'

6.81 Build to Rent can meet the needs of a number of demographic and social groups within the community. Build to Rent schemes also have the advantage of being able to offer longer term tenancies for those who want them, sometimes known as 'family friendly tenancies', providing longer term security and stability.

Communal or co-living homes

6.82 Analysis in the HEDNA shows that the largest household group in Portsmouth is single person households aged under 65, accounting for a fifth (20%) of all households. This is typical of the private rented sector profile.

6.83 Historically, single person households (or two-person households in some cases) have been accommodated through self-contained studios, one bedroom dwellings and in HMO properties. Whilst these dwelling types do provide for the needs of single person households, such provision can reduce the availability of family-sized homes in the City through the conversion and sub-division of larger properties. Purpose built communal or co-living schemes are a recent form of housing, with many schemes being recently delivered in London and Manchester, for example; they usually cater for single person households predominantly aged 18-40 years old, although are not exclusive to this demographic. This type of housing is not considered to be either a form of HMO or self-contained C3 dwelling.

6.84 Communal or co-living schemes are commonly designed with communal spaces to foster and facilitate a sense of community and to tackle loneliness. Additional shared facilities like gyms and laundry rooms are usually part of communal and co-living schemes.

6.85 One of the features of communal or co-living schemes is the ability to offer short-term contracts. Co-living accommodation is for rental periods longer than traditional short stay accommodation, but not for permanent occupation. This is usually seen as an advantage for the target user.

6.86 To date, one co-living scheme has been proposed in the City with Planning Committee resolving to grant outline planning permission in April 2022 for a 76 bedspace scheme (18/00848/OUT). The consideration of the planning merits of this scheme gives direction for this policy as to what evidence would be necessary to support a planning application for this type of development.

Service personnel and service family accommodation

6.87 Portsmouth is known as the home of the Royal Navy and the armed forces form a significant part of the fabric of the City.

6.88 According to the latest Ministry of Defence (MOD) statistics published in 2022, there were 9,350 MOD personnel located in City. In addition, the Council's estimates a further 943 service children registered in Portsmouth schools, 9,278 veterans living in Portsmouth, and 7,600 regular serving personnel based in the City. These estimates equate to approximately 18% of the City's population.

6.89 In Portsmouth, there are 714 Service Family Accommodation units which can accommodate 1,942 people and this at full capacity. A recent need assessment found that the current MOD accommodation is regarded as outdated and does not properly meet the needs of service personnel. The needs assessment sets out six recommendations for all authorities in the Solent area with regards to MOD housing. As a result, there is no need for the Local Plan to make additional policy measures beyond those already identified in the needs assessment.

Development Management Policy PLP19: Housing for Specific Groups



1. Development proposals will be supported for the following specialist housing where there is an identified need:

- a) Self-build or custom-build homes;
- b) Specialist and supported housing, including older persons housing, and children's and young people's housing;
- c) Purpose built student accommodation;
- d) Build to Rent homes;
- e) Communal or co-living homes; and
- f) Service personnel and service family accommodation.

2. Development proposals for purpose built student accommodation will be permitted where:

- a) Provision is made for cluster flats and not just studios;
- b) An appropriate management plan(s) is submitted that demonstrates that a positive and safe living environment is created for students and negative impacts on the local community are minimised;
- c) The building(s) is 'future-proofed' in terms of design to support potential alternative and appropriate uses during its lifespan; and
- d) Relevant regard has been had to the Council's Student Halls of Residence SPD¹⁰⁶ or future equivalent.

¹⁰⁶ <https://www.portsmouth.gov.uk/services/development-and-planning/supplementary-planning-documents/student-halls-of-residence-spd/>

- 3. Development proposals for Build to Rent homes will be permitted where at least 20% of the units within the scheme are let as Affordable Private Rented units at a discount of at least 20% to local market rents capped at Local Housing Allowance rates.**
- 4. Development proposals for communal or co-living homes will be permitted where an appropriate management plan(s) is submitted that demonstrates how the site will be adequately managed and negative impacts on the local community are minimised.**

Supporting Text

- 6.90 The purpose of this policy is to set out what housing types will be supported and the criteria that development proposals will be assessed against.
- 6.91 The Council will seek opportunities to support high-quality designed proposals for community led development, including self-build and custom-build projects, and ensure they contribute to the positive character of the local area.
- 6.92 Accommodation for older people can cover a range of types and needs: people of or approaching retirement age, including the active and newly retired to the very frail elderly. Housing types in this category can encompass accessible and adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs. The City has a growing number of vulnerable older people who have higher support needs and therefore require specialist accommodation. The Council will support this provision and will work with its partners to ensure the demand for specialist elderly accommodation, such as extra care housing, residential care and nursing care is met.
- 6.93 To create inclusive and healthy communities, specialist and supported housing accommodation should be located in accessible areas with links to public transport and local facilities. Specialist and supported accommodation can include hostels, residential institutions, accommodation suitable for those with disabilities and support needs, relating to both mental and physical health, and accommodation for the homeless. Flexible models of accommodation should be considered that allow residents to be supported within the City. Developers should work with the Council to identify the need for specialist housing and suitable site provision.
- 6.94 Supporting PBSA provision seeks to address likely future demand as student numbers grow and student housing options in the rental market continue to be limited. PBSA provision also potentially allows for the release of HMOs back to much-needed family homes or other types of accommodation. Additionally, PBSA should be an affordable housing option for students and, therefore, cluster flats should normally be prioritised over studio flats. However, there is need for a balance to be struck between the supply of student accommodation and the need to deliver other types of homes, facilities and services, which are competing for a limited supply of land within the City. PBSA is often proposed for sites within or in close proximity to existing residential homes. In these cases, a management plan should be submitted to support the proposal, which demonstrates that any negative impacts on the local community are minimised and that a positive and safe living environment is created for the students.

- 6.95 PBSA should be designed to be able to accommodate alternative uses, through minimal additional development or internal alteration in order to provide flexibility over the long term lifespan of a building(s) if necessary. Some alteration to meet appropriate residential space standards is anticipated and developers/applicants will be asked to demonstrate this is achievable at the planning application stage. For the avoidance of doubt, this future flexibility requirement should not be misinterpreted as support in principle for mixed use developments combining general housing accommodation with specialist housing for students.
- 6.96 Build to Rent, in the form of affordable private rent, may be one type of product to meet the City's affordable housing needs. National policy guidance¹⁰⁷ states that a minimum rent discount of 20% (relative to local market rents) is required for affordable private rent homes and recommends that 20% is a suitable benchmark for the level of affordable private rent homes to be provided and maintained in perpetuity in any Build to Rent scheme.
- 6.97 The viability of Build to Rent development, however, differs from that of a typical mixed tenure development in the sense that returns from the Build to Rent development are phased over time, whereas for a typical mixed tenure scheme capital receipts are generated as the units are sold.
- 6.98 To meet the need for accommodation for single person or two-person households and to prevent further loss of family dwellings to HMOs, the Council will support the development of purpose-built communal or co-living accommodation. It is likely that schemes will be proposed on sites within or in close proximity to existing residential homes. In this respect, it is expected that a management plan is submitted to support a proposal that demonstrates that any negative impacts on the local community are minimised, as well as demonstrating that the site will be adequately managed, including relating to entrances, security, and the maintenance of communal spaces.

Homes in Multiple Occupation

Introduction

- 6.99 An HMO is a property rented out by more than three individuals, who are not from one household, but share communal facilities such as the bathroom or kitchen. It is sometimes also called a 'house share'. An HMO with no more than six residents is defined as C4 in the use class order. An HMO with more than six residents become a 'sui generis' use. The following are not classed as HMOs: social housing, care homes, children's homes, bail hostels, properties containing the owner and up to two lodgers and properties occupied by students that are managed by an education establishment.
- 6.100 The HEDNA prepared for the Council identifies the range and types of homes required to meet the needs of different groups in the community. The assessment highlights a continued demand for HMO accommodation in the City to meet the housing needs of a number of groups, including students, young professionals, people with low incomes and people in receipt of benefits. However, it is anticipated that increased provision of purpose built student accommodation and communal or co-living homes, as well as the provision of studio and one-bed properties, may reduce demand for HMOs.

¹⁰⁷ <https://www.gov.uk/guidance/build-to-rent>

- 6.101 National planning policy states that Local Planning Authorities should plan for a sufficient supply of homes that meet the needs of different groups in the community. It highlights the need to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Underlining this need is the requirement that planning policies and decisions create places that are safe, inclusive and accessible, and which promote health and wellbeing with a high standard of amenity for existing and future users.
- 6.102 Article 4 Directions can be used to remove national permitted development rights in situations where it is necessary to protect local amenity of the wellbeing of the area.
- 6.103 A City-wide Article 4 Direction came into force in Portsmouth in 2011. The Direction means that planning permission is now required for changes of use from residential Class C3 dwelling house to small HMO (Class C4) uses. Properties that were already in use as a C4 HMO prior to 01 November 2011 are not affected by the Article 4 Direction.
- 6.104 While the important contribution of HMOs to meeting the City's housing needs is recognised, this can be at the expense of family homes through the conversion and subdivision of larger dwellings. The potential for negative social, environmental and amenity impacts of high concentrations of HMOs on local communities has been widely discussed. It is therefore considered appropriate for the Local Plan, in conjunction with other tools available to the Council, to seek to minimise the potential negative impacts of HMO development. To date, this has included implementing changes to permitted development rights through an Article 4 Direction and providing additional guidance to help assess the suitability of proposals in view of maintaining mixed and balanced communities.

Strategic Policy PLP20: Houses in Multiple Occupation

- 1. In order to support mixed and balanced communities and ensure that a range of household needs continue to be accommodated within the City, development proposals for new HMOs and changes of use to a HMO, including development to increase the occupancy of an existing HMO, will only be permitted where:**
- a) Less than 10% of residential properties within a 50-metre radius of the area surrounding the application property are in existing use as a HMO;**
 - b) Development does not result in a non-HMO property being 'sandwiched' between HMO properties and does not result in three or more HMO properties in a row¹⁰⁸;**
 - c) Development avoids harm to the amenity of nearby residents; and**
 - d) The proposal accords with the Houses in Multiple Occupation: Ensuring Mixed and Balanced Communities Supplementary Planning Document¹⁰⁹ or future equivalent.**

¹⁰⁸ As described in the Houses in Multiple Occupation: Ensuring Mixed and Balanced Communities Supplementary Planning Document or future equivalent.

¹⁰⁹ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/02/Houses-in-multiple-occupation-HMO-spd-Accessible.pdf>

2. In areas where concentrations of HMOs exceed the 10% threshold, development proposals that intensify the use of an existing HMO, namely change the use of a Class C4 or mixed C3/C4 use to an HMO in Sui Generis use or increase the occupation of an existing HMO, will only be permitted in exceptional circumstances.

Supporting Text

- 6.105 The purpose of this policy is to ensure mixed and balanced communities by supporting the development of new HMOs whilst ensuring that the amenity and quality of life of occupiers of the HMO and their neighbours are valued and protected. These aims are also supported by the requirements of Policy PLP22: Space Standards and Policy PLP1: Design.
- 6.106 The Council adopted an updated HMO Supplementary Planning Document (SPD) in November 2019. This sets out the Council's approach to mitigating the known likely potential harm caused by concentrations of HMOs and ensuring that Portsmouth's communities are mixed, balanced and sustainable. It includes a threshold of 10% of residential properties within a 50m radius of the application property guidance to help determine where a community will be considered 'imbalanced' and guidance on how any potential over concentrations of HMOs will be considered. This document is intended as a useful tool for developers and prospective landlords to gain understanding of how planning applications for new HMOs will be decided. The threshold set in the SPD has been used successfully in Portsmouth since its adoption, and its inclusion in PLP20 is a pragmatic transfer of guidance into policy.
- 6.107 Applications for HMOs should assess the likely impact of non-provision of on-site parking on highway safety, including visibility, potential for obstruction, increased congestion and, if relevant, economic impact on local business. These should be considered on a case-by-case basis, and any design and access statement should outline how these issues have been considered and, where necessary mitigated.
- 6.108 The location of existing HMOs and the cumulative impact on the character of the area including potential street clutter through a lack of space for refuse storage and cycle storage will be considered in any application for a new HMO. Where necessary, planning permissions granted for HMOs will be subject to conditions to secure provision that mitigates these impacts.
- 6.109 Due to the adverse implications to local amenity, the Council will only exceptionally grant planning permission to intensify the use of an existing HMO, namely change the use of a Class C4 or mixed C3/C4 use to an HMO in Sui Generis use or increase the occupation of an existing HMO, if sought in areas where concentrations of HMOs exceed the 10% threshold.
- 6.110 As well as the requirements set out in the Local Plan and the SPD, developers and potential landlords should be aware that there is also mandatory licensing for a wide range of HMOs. Applications for an HMO license should be made separately to the Council's private sector housing team. Development proposals should also refer to the

Council's Private Rental Strategy¹¹⁰ (2020), which sets out standards for private rentals in the city, including HMOs.

Residential Density

Introduction

- 6.111 Residential density is the measure of the number of dwellings within a specific site/land area. It is commonly expressed as dwellings per hectare (dph). Residential density is one indicator used to understand the extent a development is making efficient and effective use of the site/land.
- 6.112 There is a significant demand for additional housing within Portsmouth; it is therefore important that the most efficient and effective use of developable sites/land in the City is being made. Portsmouth is one of the UK's most densely populated cities, a trend that is continuing with increases in the average density of new build development in the City since 2012. Moreover, building density levels in Portsmouth have always been relatively high, in part due to the historic development of the City, with the rows of terraces built for the Naval Dockyard workers and their families, as well as the City's island geography presenting as a constraint on available developable land.
- 6.113 National planning policy requires Local Plans to include policies that optimise the use of land and meet as much of the identified need for new housing as possible. Such policies should include the use of minimum density standards to seek a significant uplift in the average density of residential development in locations that are well served by public transport, supported by a suitable range of densities to appropriately reflect the development potential of different areas.
- 6.114 In order to achieve the uplift of prevailing densities required, an understanding is needed of the range of existing housing densities within the city. The Urban Characterisation Study¹¹¹ divides the City into a number of character areas with an indicative average density. The areas of highest density are clustered around the City Centre, with some character areas identified as having a gross dwelling density of 75 to 100dph. Broad areas of the City are characterised by tight Victorian era terraces with gross dwelling densities of 50 to 75dph. The physically constrained nature of the City means that even the 'suburban' edges of the city often have gross dwelling densities of between 25 to 50dph.
- 6.115 The Portsmouth Core Strategy (2012) identified a number of town centres and other key areas considered suitable for higher density development based upon accessibility to essential facilities and high frequency public transport. Within these areas there was a requirement for at least 100dph, with a minimum of 40dph across the rest of the City. However, monitoring data since 2012 shows that the average density achieved on new development has exceeded both the Core Strategy's higher and lower density targets, with the average for the lower density target area achieving double the target, at over 80dph, year on year.

¹¹⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/08/Private-Rental-Sector-strategy-2021-2026.pdf>

¹¹¹ <https://www.portsmouth.gov.uk/newlocalplanevidencedocm>

6.116 The Portsmouth Local Plan updates the density targets for new residential development in the City, which has been developed on analysis of existing density areas to determine an appropriate uplift based on existing built form, accessibility to key services and public transport, and identified schemes for significant new development. This approach will help to support health and wellbeing through potentially encouraging more active travel (and thus reducing congestion) and directing higher growth to town centre locations. However, as the National Design Guidance highlights, density is only one aspect of design and a development proposal will ultimately be informed and influenced by a range of design principles, components, and considerations.

Development Management Policy PLP21: Residential Density



1. Development proposals for residential development, including mixed-use schemes that have a residential element, will be permitted where the residential density is in accordance with the minimum density for its location, as shown on the Policies Map, as follows:

- **High density development of at least 120dph in areas of high accessibility;**
- **Medium density development of at least 80dph across the City's core residential areas;**
- **Lower density development of at least 40dph in the suburban edge.**

2. Where a proposed development has a lower residential density level to the thresholds above, the proposal must be supported by robust evidence and rationale that justifies the proposed density is appropriate and is responding positively to its context.

Supporting Text

6.117 The purpose of this policy is to set density targets for new residential development in Portsmouth appropriate to its location in order to make more efficient and effective use of sites/land.

6.118 This Local Plan divides the City into three broad residential density zones, which are illustrated in Figure 6.1 and on the Policies Map. Further detail on these zones is as follows:

- **High Density - Highly Accessible Areas:** These areas will be the focus of new high density residential development within the City, forming a zone with a minimum density of 120dph. They broadly comprise of the City Centre and surrounds and most of the town and district centres. These are generally areas where there is or will be high accessibility to public transport. High density levels will also help to support local services within these areas and provide future residents with ready access to local employment opportunities.
- **Medium Density - Residential Core:** The residential core area will have a target of a minimum of 80dph that aims to ensure that there is an uplift in prevailing densities across these parts of the City.
- **Low Density - Suburban Edge:** The suburban edge provides an opportunity for a wider range of types and tenures of residential development to be delivered in these areas, especially houses, and will therefore have a lower minimum density target of 40dph.

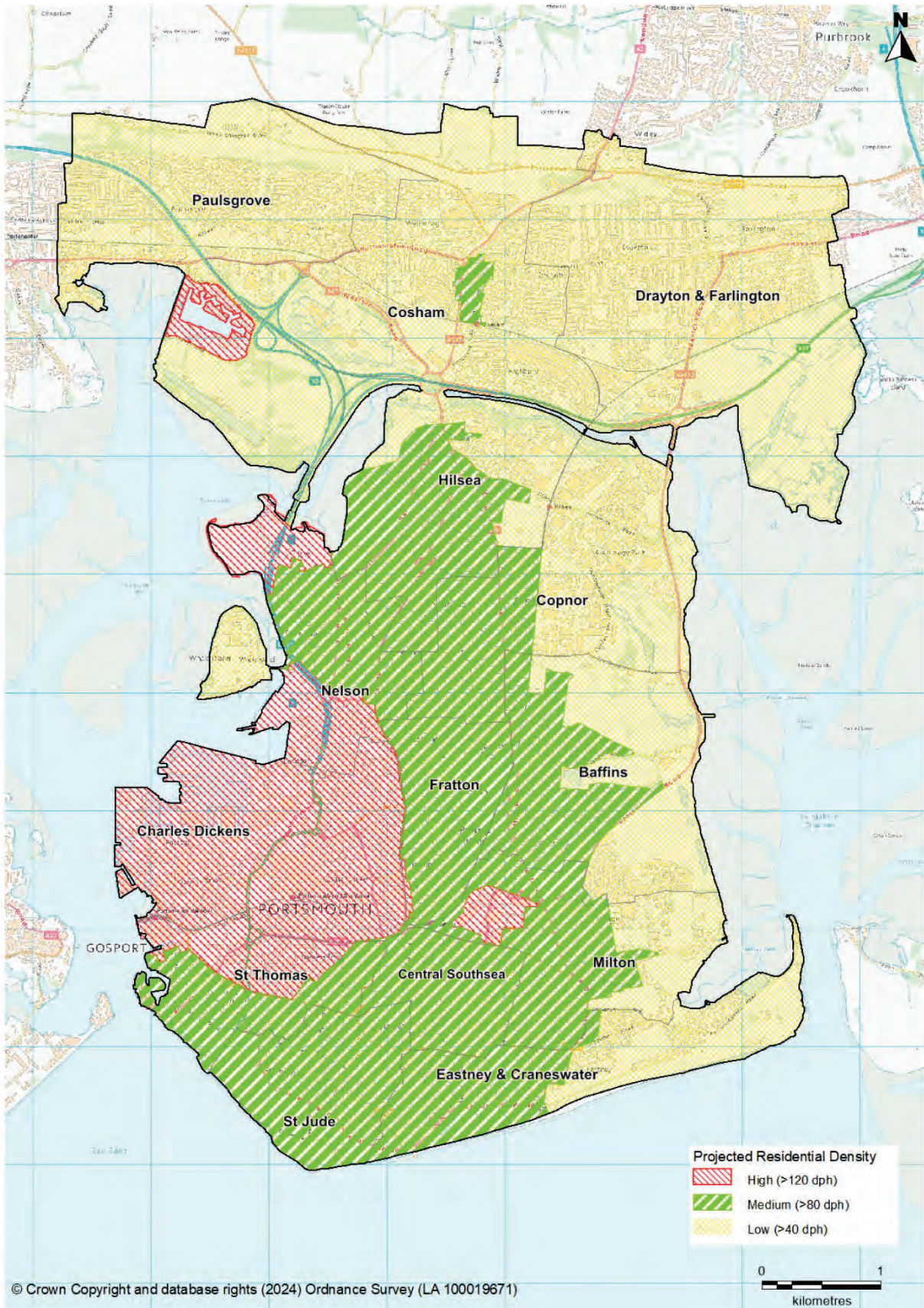


Figure 6.1: Residential density zones in Portsmouth

6.119 Residential density is only one indicator of how the resulting development may manifest as a built form, which is also influenced and informed by other factors relating to the site and its context. Development proposals should therefore accord with Policy PLP1 Design and policies contained in the Local Plan as a whole. Evidence and rationale should be submitted with any development proposal that seeks to propose an alternative residential density level to the thresholds set out in Policy PLP21.

Space Standards

Introduction

- 6.120 The Council is dedicated to ensuring that the provision of high quality living standards and environments is not compromised by the need to deliver new housing for the City. New homes must meet the needs of current and future residents and set the foundations for well-designed, safe environments that support the health and wellbeing of occupiers.
- 6.121 New homes should be built to sufficient space standards that meet the various daily needs of occupiers, for example a room to sleep in or outdoor garden space for recreation. Homes that only offer adequate internal floor area but lack storage space or external amenity space are unlikely to meet the needs of occupiers.
- 6.122 In March 2015, the Government published the Technical housing standards - national described space standard¹¹² (since amended in May 2016), which sets out the standard for minimum Gross Internal Areas (GIA) that new housing in England should be built to. Local Planning Authorities can opt to use nationally described space standards (NDSS) to ensure homes meet minimum size requirements. The application of minimum internal space standards will ensure internal floorspace in new developments is sufficient for the number of people the dwelling is accommodating.
- 6.123 Analysis of past completions between 2015-2020 in the City found a strong correlation between the size of dwellings (number of beds) and the proportion that met the NDSS. Smaller dwellings with fewer beds were significantly less likely to be compliant with the NDSS than larger dwellings. Only 32% of the one-bed / one person dwellings permitted met the NDSS. By comparison, the NDSS were met by 100% of the permitted three-bed / five person dwelling and 82% of the two-bed / four-person dwellings.
- 6.124 Portsmouth has a number of areas ranked amongst the highest levels of deprivation in the country. The City needs to work to improve living standards for all its residents; it is important therefore that the NDSS is formally adopted in the Local Plan to avoid the creation of substandard dwellings, particularly to protect those who may have fewer housing options available to them.
- 6.125 In terms of external amenity space, new homes need to be delivered with sufficiently sized and provisioned external space to support residents' mental and physical wellbeing. This could be in the form of private or communal space.

¹¹²https://assets.publishing.service.gov.uk/media/6123c60e8fa8f53dd1f9b04d/160519_Nationally_Described_Space_Standard.pdf

Development Management Policy PLP22: Space Standards

1. Development proposals will be permitted where they ensure that the external and internal space needs of occupiers are met through compliance of the following:
 - a) Achieve or exceed the minimum Gross Internal Area standards as set out in the 'Technical Housing Standards – nationally described space standard'¹¹³ (or future equivalent);
 - b) Provide sufficient onsite external private amenity space / balcony space, and/or onsite communal outdoor amenity space;
 - c) Provide sufficient onsite storage space for waste refuse and recycling.

Supporting text

- 6.126 The purpose of this policy is to ensure adequate living standards and environments for the City's population, and to increase the number of people living in sufficiently decent-sized homes in the City.
- 6.127 To ensure that new homes provide sufficient space for basic daily needs and activities, all residential development will be required to meet the Government's Technical Housing Standards - nationally described space standards (or future equivalent).
- 6.128 All proposals for new homes, including change of use or conversions, must meet each appropriate space standard as a minimum. There are no maximum standards, and developers are encouraged to provide larger rooms and dwellings where possible. The space standards apply across all tenures. Additional standards for affordable housing, both privately and publicly funded, can be found in the Council's Providing Affordable Housing in Portsmouth guidance document.
- 6.129 Development must provide sufficient onsite private external amenity space / balcony space, and/or communal outdoor amenity space. Private amenity space, for example private gardens, may be more appropriate for houses, whereas balconies are usually more suitable for flats although there may be scope for ground floor flats to have their own private garden space. In all cases, private amenity and/or balcony spaces should be provided on a 1 to 1 basis so that provision is made for all homes. In the case of private balconies, however, there may be safety and/or design reasons as to why balconies would not be appropriate or would not be appropriate for every home, for example, in a high-rise flat scheme. In these cases provision should be made for communal outdoor amenity space to supplement or be a substitute for private balconies.
- 6.130 Communal outdoor amenity space would usually be suited for flat developments or forms of communal accommodation. Communal outdoor amenity space may be provided proportionate to the proposed number of bedrooms. Where a development is in close proximity to an existing public open space (100 metre walking distance), a reduced provision of onsite communal outdoor amenity space may be acceptable.

113

https://assets.publishing.service.gov.uk/media/6123c60e8fa8f53dd1f9b04d/160519_Nationally_Described_Space_Standard.pdf

6.131 Sufficient onsite storage space for waste refuse/recycling must be provided. The solution for this will largely depend on the nature of a scheme, for example houses or flats, which will dictate whether individual, for example dedicated external bin store, or communal provision, for example a shared bin store, is appropriate. Developers/applicants are encouraged to engage with the Council at the earliest opportunity to discuss what would be the most appropriate solution for a site/scheme, which would also relate to discussions about waste management and servicing.

Estate Renewal

Introduction

6.132 Within the City there are a number of housing estates which are predominantly in Portsmouth City Council ownership. These estates were mainly developed in the post war period to provide housing in the City to replace that lost in the World War II. The areas of the City closest to the Naval Dockyard were those most heavily damaged and it is within these areas that most of the rebuilding and public housing estate creation happened. The notable exception to this is Paulsgrove, which was constructed on what at the time was the edge of the City to house residents who had lost their homes.

6.133 The estates were built largely from the 1950s to the early 1970s using development principles based on ideas around patterns of living, use of open space and motor vehicles which were prevalent at the time. The road-oriented development patterns of the time created physical barriers between estates and other areas of the city, as well as dominating the built environment.

6.134 There are opportunities to revisit the design of aspects of the estates, such as above-ground walkways and bin stores, to reform and make spaces more useable for modern needs. In addition, there are opportunities for the reuse of spaces which no longer function as originally intended, for example drying court areas or internal drying spaces. There are, however, aspects of the mid twentieth century estate design that have significant positives, such as the more generous space standards which the properties were built to.

6.135 Given that the properties in these estates are largely over 50 years old, there are homes which are likely to be approaching the end of their usable lifespan and will require future refurbishment or replacement. The Council has a rolling programme of planned maintenance, renewal, and renovation of its stock within the City. The most recent example was Wilmcote House that was renovated to EnerPhit standards, which are the retrofit equivalent of Passivhaus standards. This programme is ongoing with proposals being developed to replace the now demolished Horatia and Leamington Houses in Somerstown. A map showing the estates being renewed forms figure 6.2.

Area Allocation Policy PLP23: Estate Renewal

1. Development proposals within Portsmouth City Council's Estates, as identified on the Policies Map will be supported provided that they:

- a) Make provision for suitable homes to meet the needs of residents, including through comprehensive redevelopment or the maintenance and/or improvements to existing housing stock;**

- b) Make provision for accessible facilities and hubs for the community;**
- c) Make the health and wellbeing of residents central to all aspects of the proposal;**
- d) Improve access and legibility through improved connectivity, including links to the wider City, employment locations and key facilities;**
- e) Create welcoming, accessible high quality open spaces and play areas and improvements to existing open spaces and amenity areas;**
- f) Deliver improved, safer pedestrian and cycle routes; and**
- g) Deliver high quality design and sustainability, taking into account any relevant design guidance or codes.**

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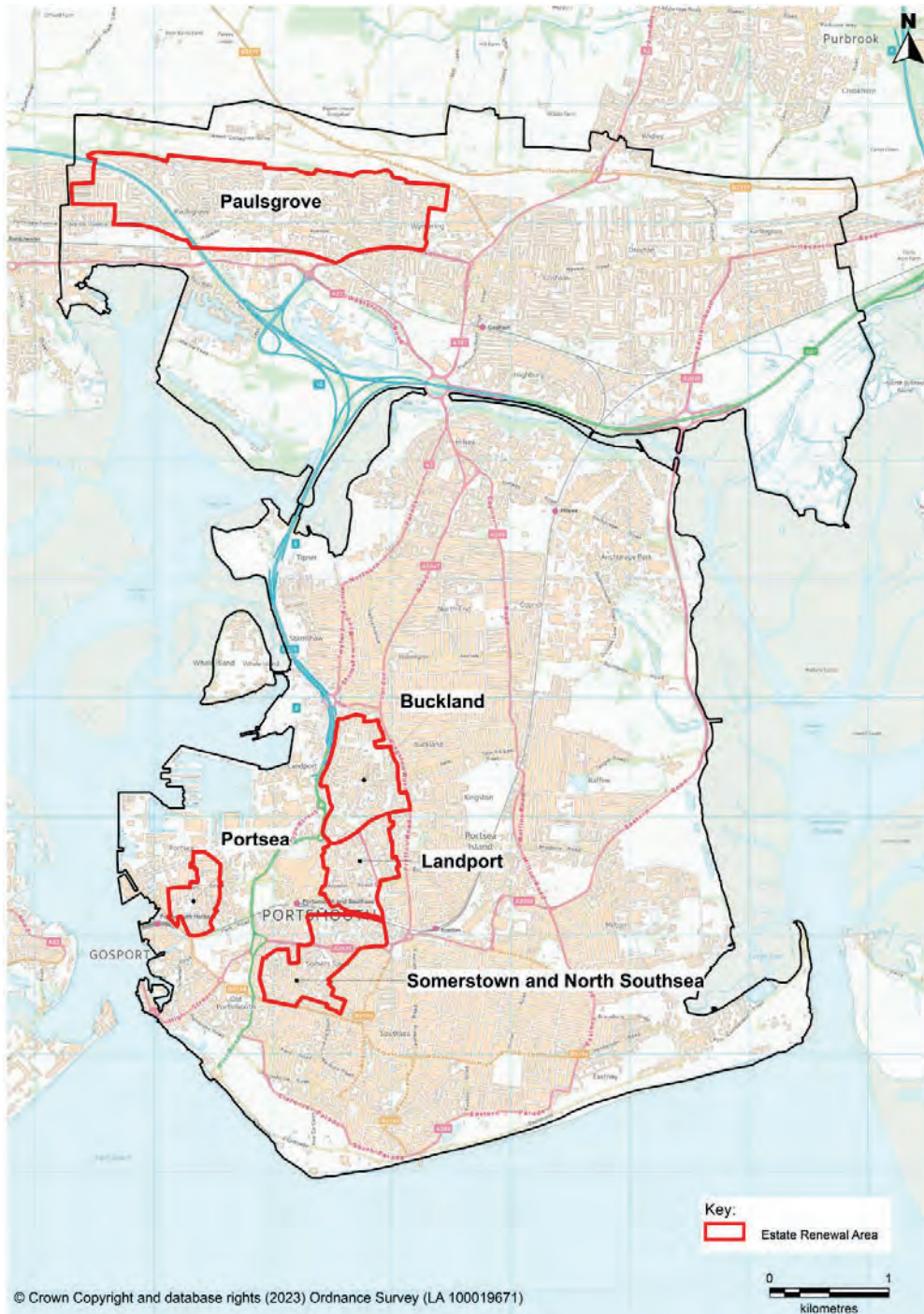


Figure 6.2: Map of Estate Renewal in Portsmouth

Supporting Text

6.136 The purpose of the policy is to ensure renewal in the City's predominantly Council owned estates contributes towards creating a healthier, safer and more welcoming environment for local residents.

6.137 The policy seeks to encourage the Council and other landowners to plan for wider estate renewal as opportunities arise, thus avoiding a piecemeal approach to development. The aim is to improve the quality of the housing, rationalise existing stock

through renewal or replacement and provide additional affordable/social and market housing in these areas.

- 6.138 Estate renewal will be expected to provide a high quality of design and sustainability, including high levels of energy and water efficiency and green infrastructure in line with relevant Local Plan policies.
- 6.139 Index of Multiple Deprivation data (2019) for Portsmouth shows that there are clear pockets of poor scoring areas around the City Centre and Paulsgrove where the estates are largely located. This means that those living in these areas have poorer health outcomes, on average, than those living in other areas of the City. Therefore, development proposals must make the health and wellbeing of residents central to all aspects of the proposal, including the submission of a Health Impact Assessment
- 6.140 Estate renewal should include the provision of good quality public open space, including play areas, safe routes with good access to services and facilities and improved connections to the wider urban area. Consideration should be given to promoting local food growing initiatives, including community gardens and orchards. This accords with other policies of this Plan, and with national planning policy that encourages the utilisation of existing development areas where possible and the creation of mixed, sustainable communities that promote the health and wellbeing of residents.
- 6.141 In March 2021, Portsmouth City Council was awarded funding to pilot test the Government's National Model Design Code, which provides guidance on the production of design codes and design guides. The City Council will seek to develop a design coding process for estate renewal within the City, using the findings of the pilot that utilised the Horatia and Leamington site redevelopment in Somerstown as a case study. The development and testing of a future Estate Renewal Design Code will be developed in consultation with residents and with input from service areas across the Council. Once produced, such a Design Code could be adopted by the Council to help guide proposals within the other Council-owned estates in the City.

Gypsies, Travellers & Travelling Showpeople

Introduction

- 6.142 National planning policy sets out that the housing needs of different groups should be assessed and reflected in planning policies, including for travellers. The overarching aim is to ensure fair and equal treatment, in a way that facilitates the traditional and nomadic life of travellers while respecting the interests of the settled community. To help achieve this aim, local authorities are required to assess need for Gypsies and Travellers for the purposes of planning, work collaboratively to develop fair and effective strategies to meet identified need, seek to reduce tensions between settled and traveller communities and ensure Local Plans include fair, realistic and inclusive policies.
- 6.143 The range of actions relating to Gypsies and Travellers, from policy making to management of encampments requires a collaborative, multi-agency approach that spans departments within the Council, from Planning to Housing and Neighbourhood services, and external bodies. The Council's Community Safety team works to manage Gypsy and Traveller encampments through a partnership approach and regular liaison with external organisations such as the Police. This collaboration has fed into understanding the need for Gypsy and Traveller accommodation across the City.

6.144 There are differences between the culture and traditions of Gypsies and Travellers, and Travelling Showpeople, and the Government's Planning Policy for Traveller Sites¹¹⁴ (2015) provides definitions of each (see the Glossary). There are currently (as of autumn 2023) no authorised Gypsy and Traveller, or Travelling Showpeople sites within Portsmouth.

6.145 A robust Gypsy and Traveller Accommodation Assessment (GTAA, 2023)¹¹⁵ has been undertaken in accordance with Government Planning Policy. This shows that there are no Gypsy and Traveller households identified in Portsmouth that met the Government's definition¹¹⁶ and also no households that either did not meet the definition or were undetermined with regard to the definition. The GTAA found there was no identified need for either permanent or transit sites for Gypsies and Travellers for the plan period to 2040. There are also no Travelling Showpeople yards in the City and no current or future (to 2040) need for plots.

6.146 While the assessment identifies instances of unauthorised encampments, these are due to Gypsies and Travellers using the City for its seafront location for short periods over the summer months. These are managed effectively by the Council in partnership with the Police, who apply a degree of toleration to those looking to move on within a few days and do not cause disruption. This use of the City by Gypsies and Travellers does not currently result in any formal need for transit sites within the plan period. However, this will be monitored going forward to determine any increases in the number, size of and length of stay of encampments.

6.147 Due to there being no identified need for permanent or transit sites, the criteria-based policy below provides a framework for decision making should any planning applications be submitted. Paramount consideration should be given to the health and safety of gypsies, travellers and travelling showpeople, with regard to proximity to land contamination and areas of flood risk, while striking a balance in appraising and avoiding significant adverse impacts on the local area and community. Mobile homes, caravans and park homes intended for permanent residential use are particularly vulnerable to flooding and classified as highly vulnerable uses in National Technical Guidance on Flood Risk¹¹⁷.

Development Management Policy PLP24: Gypsies, Travellers & Travelling

Showpeople

1. Development proposals for Gypsies, Travellers and Travelling Showpeople accommodation will be permitted provided that:

- a) Sites are well related to, and have safe and reasonable access to local facilities including shops, schools, community, health and welfare services;
- b) Sites should have reasonable access to the road network for vehicles, pedestrians and cyclists, and where possible, to public transport;

¹¹⁴ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

¹¹⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/Portsmouth-GTAA-Final-Report.pdf>

¹¹⁶ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

¹¹⁷ <https://assets.publishing.service.gov.uk/media/5a79a6a6e5274a684690b1b3/2115548.pdf>

- c) **Sites for permanent accommodation must not be located within Flood Zone 2 or 3;**
- d) **Sites for transit or temporary accommodation must not be located within Flood Zone 3;**
- e) **Sites for permanent or transit accommodation must not be located on contaminated or unstable land unless the land can be appropriately remediated and mitigated as part of proposed development;**
- f) **Sites should have or be capable of being serviced with adequate infrastructure and on site utilities, including water supply, sewage disposal and power, to service the number of pitches proposed;**
- g) **Sites should be appropriately landscaped to avoid adverse impacts on the visual amenity and character of the surrounding area, or on the natural or historic environment;**
- h) **Good design and landscaping should ensure that sites have adequate residential amenity and privacy for intended occupiers. This should include play space, ancillary storage and business activities, the latter where compatible with surrounding uses and character;**
- i) **Sites should not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers; and**
- j) **There should be safe vehicular access from the highway and adequate parking provision and turning areas.**

Supporting Text

- 6.148 The purpose of the policy is to enable the well-being of Gypsies and Travellers and to support their integration and co-existence in the local community.
- 6.149 The policy seeks to ensure development for new Gypsy and Traveller accommodation is well located and safe. Sites should have reasonable access to local services and facilities, including shops, schools, community, health and welfare facilities. This helps ensure a settled base and the sustainability of the site.
- 6.150 The policy seeks to direct development away from areas of flood risk, given the vulnerability of caravans. Flood Risk Technical guidance to the National Planning Policy Framework defines caravans and mobile homes for permanent use as highly vulnerable uses. As such they are not appropriate in Flood Zone 3a, which carries a high probability of flooding, or Flood Zone 3b Functional Floodplain, where water will flow or be stored in times of flood. A sequential test and an exception test are required for any permanent caravan, mobile home or chalet type development, including change of use, proposed in Flood Zone 2 (medium probability of flooding).
- 6.151 Caravans and mobile homes are particularly vulnerable to land contamination and instability, and the policy seeks to direct development away from contaminated or unstable land, where possible. In rare instances where development is proposed and considered on or near contaminated land, Development Management Policy PLP37 Contaminated Land should be applied, which seeks to prevent unacceptable risk from contamination.

- 6.152 A number of sites within Portsmouth are sensitive in terms of their natural environment and historic importance. Applications should be considered to accord with these policies to ensure they appropriately conserve these elements of the environment.
- 6.153 Good design and landscaping of sites should be incorporated, both to avoid and minimise any adverse visual impacts on local character and amenity, and to ensure adequate privacy and residential amenity of occupiers of the site. This should include space for children to play and ancillary storage. The layout of sites should conform to the latest available Government guidance and take into account recommendations from the Showmen's Guild, where relevant.
- 6.154 Protecting the amenities of neighbouring occupiers is important in the assessment of planning applications, and consideration should be given to potential noise, disturbance or environmental impacts with regard to relevant plan policies. Due consideration should also be given to ensuring Gypsy and Traveller sites and their occupants are not subject to unacceptable residential and environmental amenity through inappropriate location, proximity to conflicting uses or poor design.
- 6.155 To ensure economic and environmental sustainability of proposed sites, positive consideration should be given to the extent to which some Gypsy and Travellers traditionally live and work in the same location. This can omit travel to work journeys, and the location of ancillary and associated business activities on sites should be considered with regard to National Planning Policy for Traveller Sites. Any ancillary business uses should be compatible with surrounding uses and local character, the amenity of neighbouring occupiers and should not cause unreasonable levels of noise or disturbance. Conditions may be imposed to limit the proportion of a site or the type of business use, as appropriate.

Chapter 7: Thriving Economy

Introduction

7.1 The 2040 Vision is for Portsmouth to be a City with a thriving economy, which supercharges local businesses and entrepreneurs and attracts investment nationally and internationally from businesses of all sizes. The Vision emphasises the importance of strong partnerships between employers and people both in terms of jobs and skills. The Portsmouth Economic Development and Regeneration Strategy¹¹⁸ accords with the 2040 Vision. Its overall aim is to 'make Portsmouth Britain's premier waterfront technology and innovation city – a great place to invest, learn, live, work and visit and the most attractive place for starting, growing or relocating a business.' This is illustrated in figure 7.1.



Figure 7.1: The Economy of Portsmouth

7.2 This chapter of the Local Plan is about planning for economic growth in Portsmouth. The first two policies are about providing and protecting employment land. Planning defines employment as offices, research and development, industrial processes, manufacturing and warehousing and therefore the employment floorspace figures in this chapter only relate to these types of businesses. A huge variety of businesses and activities can provide jobs, and of course not all of these take place in offices, industrial premises and warehouses. In fact, the sector which provides most jobs in the City is health, which is unsurprising given that there are two hospitals in Portsmouth, namely Queen Alexandra and St Mary's. There are a number of use classes defined in the Use Classes Order¹¹⁹ that provide jobs and generate income, for example schools and universities, but are not defined as employment in planning.

¹¹⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/01/Economic-Development-Regeneration-Strategy-Accessible.pdf>

¹¹⁹ <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes>

- 7.3 The three largest sectors of employment in Portsmouth are health reflecting the presence of two hospitals, manufacturing including the maritime and engineering employment sectors related to naval activity and research, and public administration including defence reflecting the City Council and naval / defence employment. Other large sectors of employment in the City are education reflecting the presence of the University, retail reflecting the City Centre function, hospitality with the City as a tourism and port destination and business administration. Sectors which are less represented in the City are finance, professional services, wholesale and agriculture. Overall, typically office based sectors, such as banking and accountancy, have lower representation in the City, which is important as they tend to have higher productivity and earnings.
- 7.4 The City is home to His Majesty's Naval Base Portsmouth, which is a significant employer with an estimated 13,000 jobs and houses almost two thirds of the Royal Navy's surface ships, including the flagship aircraft carriers HMS Queen Elizabeth and HMS Prince Of Wales. The Naval Base generates a significant supply chain requirement in the marine and maritime engineering sectors with an estimated 1,200 companies supplying the base. There are high levels of employment in a range of specialist manufacturing sectors including ship maintenance, equipment manufacturing, air and space craft manufacturing and ship building. These sectors are likely to continue to play a central role in the Portsmouth economy. Some of these jobs will be high value and higher salary in nature and others potentially be lower wage / lower productivity.
- 7.5 The University of Portsmouth is also a major employer. It has a number of key research areas including defence, biomedical and maritime. The University is working to develop a Portsmouth Research Institute for Space Missions.
- 7.6 Portsmouth International Port (PIP) is central to the City's economy with total local employment linked to PIP currently standing at 2,410 jobs and the local economic impact from port activities standing at £189 million. There are 1.8 million international cruise and ferry passengers traveling through the City with each large cruise ship call generating as much as £1.5 million to the City's economy. The Masterplan¹²⁰ for PIP was approved by the City Council in 2022 and aims to create 11,333 jobs and positively impact the local economy by £387 million by 2042 and is a key part of the City's Economic Development and Regeneration Strategy.
- 7.7 Portsmouth's unemployment rates are consistently higher than the South East and national averages, whilst many of the higher skilled jobs are taken by people who commute into the City for work. One metric for unemployment in the UK is the unemployment rate for people 16 and over. At 3.8%, Portsmouth has a slightly higher unemployment rate than the South East (3.1%) and England (3.6%) for the most recent period (2022). In terms of economic inactivity, Portsmouth has a markedly higher rate of long term sick (30.3%) compared to the South East (22.6%) and Great Britain (26.5%). The health of residents therefore has an impact on the overall economic performance. Portsmouth has a higher rate of people defined as Looking After Family/Home (24.4%) compared to the South East (19.1%) and Great Britain (19.7%). Indices of Multiple Deprivation data from 2019 (which is the latest data) provides insight into the challenges faced by some residents. Many parts of the City fall into the top 10% most deprived areas in the country. This includes deprivation in the domains of income, education, employment, health, crime and housing. Given these statistics, there will be residents

¹²⁰ <https://portsmouth-port.co.uk/wp-content/uploads/2022/02/Masterplan-web.pdf>

who have low skills and find difficulty in accessing good quality employment. With high expectations for growth, the City Council and its partners will need to raise aspirations and diversify the skills of the workforce to continue to ensure that local people can make the most of new job opportunities that will arise in the City. Policy PLP27 deals with employability and skills.

7.8 The City Centre along with the Town, District and Local centres lie at the heart of local communities across the City. Policy PLP28 seeks to promote the vitality and viability of the identified centres, which are where the main town centre uses of retail, leisure, offices, arts, culture and tourism should be located. Policy PLP29 relates to applications for small local shops and proposals for town centre uses outside town centres.

7.9 Portsmouth has world-class heritage and cultural attractions, notably the Historic Dockyard and the D-Day Story. Policy PLP30 deals with the cultural and visitor economy, which is expanding rapidly in the City based on its maritime location, heritage and identity. The City of Portsmouth has a proud track record of hosting major events such as the Victorious Festival and the Great South Run. This all makes culture-led regeneration an essential part of promoting a thriving economy in the City.

7.10 The City Council's ambitions for a thriving economy are in line with the Government's Industrial Strategy¹²¹. This aims to boost productivity by backing businesses to create good jobs and increase the earning power of people throughout the UK with investment in skills, industries and infrastructure. The policies in this chapter are consistent with the NPPF, which requires Local Plan policies to help create the conditions in which businesses can invest, expand and adapt. As illustrated in figure 7.1, the Portsmouth economy specialises in advanced manufacturing and engineering particularly in the marine and space sectors linked to both the Royal Navy and the University of Portsmouth. This Local Plan seeks to ensure that the City can be a global leader in driving innovation, that there are sufficient fit for purpose business premises and that there is a skilled local workforce.

Employment Target

Introduction

7.11 Portsmouth's island city geography, naval history and demographic profile have influenced the demand, investment and type of economic activities that take place in the City today. The key sectors are defence and aerospace, advanced manufacturing and engineering, digital and creative industries, marine and maritime industries, health and tourism. Portsmouth is an important centre for work within the sub-region, home to two-thirds of the UK's naval fleet and an internationally recognised university. The Solent Local Enterprise Partnership (LEP) predicts that Portsmouth will be one of the key drivers of growth within the sub-region during the plan period.

7.12 One of the challenges for the Portsmouth Local Plan is to provide a balance between the provision of sufficient and accessible employment land to support growth and local opportunities whilst striving to meet the need for quality homes for a growing population within the physical and environmental constraints of the city.

¹²¹ <https://www.gov.uk/government/topical-events/the-uks-industrial-strategy>

7.13 The City is key to the Solent's growing marine and maritime sector. Portsmouth benefits from the presence of the International Port, HM Naval Base and a number of waterfront access sites including Trafalgar Wharf, Port Solent and The Camber. Portsmouth City Council is one of the City's major employers alongside the Naval Base, the University of Portsmouth, Airbus Defence and Space, BAE systems and Pall Europe. Lakeside North Harbour Business Park in Cosham offers a premier office, research and development space, which draws businesses from across the sub-region, while the City's well-occupied industrial estates in Hilsea support a range of sectors.

7.14 However, there is notable under-representation in Portsmouth of some high value-added and knowledge related sectors including finance, insurance and business services and the professional, scientific and technical sub-sector, compared to the national average. Economic inactivity amongst the working age group is comparatively high, with nearly one in four residents out of work particularly in the over 50s group. The causes for this are complex and include ill-health, family and caring responsibilities as well as those actively seeking work.

7.15 The Economic Development and Regeneration Strategy (2019-36) sets ambitious targets for the City as follows, which the Local Plan seeks to deliver:

- 7,000 more jobs
- An extra 7,000 Portsmouth residents in work
- £60,000 of GVA per person by 2036
- £1,000 a week average earning by employees in Portsmouth
- 5% of Portsmouth residents with no qualifications in 2036
- 40% educated to at least NVQ Level 4

7.16 Much of the evidence on economic development that supports the Local Plan both in regard to the need and the supply of employment land is provided by the Housing and Economic Development Needs Assessment (HEDNA)¹²² produced by Icen in 2023. This study was done post Covid and Brexit, which had both temporary and permanent impacts on the local economy such as the 'flight to quality' for office premises and the 'onshoring' of industrial activities. Previous evidence based studies of note are the Approach to Employment Land Study¹²³ by BE Group, which reviewed existing strategies, targets and several employment sites including the key strategic sites. The findings of this study were tested in 2020 by the Portsmouth City Employment Land Forecasting 2020 by GL Hearn¹²⁴.

7.17 There are two main studies on the supply of employment land. Firstly, the Business Needs, Site Assessments and Employment Study¹²⁵ by Lambert Smith Hampton looked at the quality and suitability of existing and potential new employment sites and whether there are any gaps in the provision. The Housing and Economic Land Availability

¹²² https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

¹²³ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-employment-land-study.pdf>

¹²⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Portsmouth-Employment-Needs-Review-Final_Accessible-Final_compressed.pdf

¹²⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-business-needs-site-assessments-and-employment-land-study.pdf>

Assessment (HELAA)¹²⁶ identified and appraised all possible sources of new economic land in the City. The supply of new employment sites in the HELAA is very limited due to the constrained geography of Portsmouth. A number of low quality employment sites identified in both studies were considered and some found suitable for housing.

- 7.18 The HEDNA analysed the outlook for employment growth up to 2040 in Portsmouth and the results of the analysis were used to inform the employment floorspace and land needs forecasts. Oxford Economics forecasts were used as a baseline and these were adjusted as an alternative, drawing on policy initiatives, stakeholder engagement and sector analysis. The Council's employment targets set out in the Economic Development and Regeneration Strategy are for 7,000 jobs between 2017 and 2036. Oxford Economics forecast 10,500 jobs (net) over this period which suggests the target is wholly achievable. The HEDNA considered that notwithstanding the impacts of Brexit and the Covid-19 pandemic that overall the employment outlook in terms of total jobs remains positive.
- 7.19 In regard to manufacturing and warehousing, Portsmouth has clear advantages and opportunities in the marine sector. This includes the potential to deliver a new marine hub at Tipner West and Horsea Island East. Estimates are that this could achieve some 1,600 to 1,900 jobs alone depending on densities. The Oxford Economics forecasts assume a decline in manufacturing employment in the baseline outlook, and this is considered necessary by them to yield productivity improvements. This approach will not factor in local economic factors or development opportunities. It would be reasonable to expect that some more traditional manufacturing sectors will see some decline in Portsmouth, but that other sectors, including those specialists to Portsmouth and associated with development opportunities, will grow. The HEDNA concludes that the preferred alternative labour demand scenario is the most appropriate method for estimating future requirements of industrial and warehousing floorspace including research and development. The need figure in the City is around 96,300m² up to 2040. Drawing together the need and supply position for manufacturing and warehousing there is a broad balance in terms of supply and demand. This reflects the importance of the Tipner West and Horsea Island East allocation in ensuring development needs can be met, as well as the allocation at land in the City Centre and the Portsdown Technology Park.
- 7.20 In regard to offices, there has been a significant shift to home and hybrid working post-Covid. The HEDNA considers that post-pandemic office occupancy is at 43% of pre-pandemic levels. Therefore it factors in reduced levels of employment growth and replacement demand for office development. The strategic allocation at Lakeside North Harbour reflects the 'flight to quality' phenomenon whereby tenants and investors are seeking out high-quality, modern and well-equipped office spaces over older or less desirable alternatives. Lakeside is Portsmouth's premier business location and the allocation will enable it to continue attracting businesses to its impressive parkland setting. The HEDNA concludes that the preferred alternative labour demand scenario is the most appropriate method for estimating future requirements of office floorspace development. The need figure in the City is around 42,500m² going up to 2040. Drawing together the need and supply position for offices the current position suggests there could be a small oversupply of space in the future. This is based on recent trends in a

¹²⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/02-PCC_Housing-and-Employment-Land-Availability-Assessment_2023-Report_FINAL-latest-version-for-CDL.pdf

weakened office market and a focus on quality over quantity. This indicates that premier locations such as Lakeside need to be retained for potential investment over the plan period. The supply also enables a flexible approach to opportunities that would see significant investment in the City and which would also generate higher-value jobs.

7.21 The sources of employment land that make up the target in Policy PLP25 are set out in Table 7.1. Figures are set out for completions in the first three years of the plan period, extant permissions as of 2023 and Local Plan allocations. The first type of employment floorspace is in the Commercial, Business and Services use class E, which can be carried out in a residential area without detriment to its amenity. For the purposes of the Local Plan offices, research and development and industrial processes are E class uses that count towards our employment target. Other E class uses such as retail and similar activities are not included in the employment target notwithstanding the contribution they make to the local economy and employment provision. The second type of employment floorspace shown in the table is a mixture of general industrial and storage or distribution that cannot be carried out in a residential area without detriment to its amenity. They come under the B2 and B8 use classes respectively. All figures are net and are set out in square metres of new employment floorspace.

7.22 Drawing the need (42,500m²) and supply (58,645m²) positions together there is indication of a potential small over-supply of office floorspace subject to a more pronounced return to office usage in the future. The position in terms of combined manufacturing, warehousing and research and development need (96,300m²) and supply (79,784m²) is that there is a small under-supply. It should be noted that there is flexibility between the E class uses of offices and research and development. Overall there is an approximate balance between all types of employment need and supply.

| Source | | Office (E(g)(i) (m ²)) | R&D/ industrial processes (E(g)(ii&iii) (m ²)) | Manufacturing / warehousing (B2/B8) (m ²) | Total employment (m ²) |
|----------------------------------|---|---------------------------------------|--|---|--|
| Completions 2020-2023 | | 2,131 | 1,030 | -3,213 | -52 |
| Extant permissions 31 March 2023 | | 4,968 | 1,740 | 9,727 | 16,435 |
| Strategic site | City Centre | 1,546 | - | - | 1,546 |
| Strategic site | Tipner West & Horsea Island East | - | - | 58,000 | 58,000 |
| Strategic site | Lakeside | 50,000 | - | - | 50,000 |
| Allocation | Land West of Portsdown Technology Park | | 12,500 | - | 12,500 |
| Total | | 58,645 | 15,270 | 64,514 | 138,429 |

Table 7.1: Sources of Employment Land in Portsmouth

7.23 The employment evidence base highlighted the possibility of intensifying and modernising the employment offer of some of our industrial estates that currently do not make efficient use of land. A number of these intensification opportunities are identified in the HELAA and the Approach to Employment Land Study by BE Group. It is understood that opportunities for further manufacturing / warehousing development may come through during the plan period on these and other sites as employment windfall.

7.24 Government policy states that local plans should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. Marine businesses form a key locational cluster in Portsmouth and Tipner West and Horsea Island East is allocated for that sector as part of a mixed use scheme. Marine businesses in waterside locations are safeguarded under Policy PLP26. New offices are planned to increase the business offer at Lakeside North Harbour and will form part of the redevelopment proposals of the City Centre.

Strategic Policy PLP25: Employment Target



1. The Council will make overall provision for at least 138,429m² of new employment floorspace during the Plan period 2020-2040 for the following types of businesses:

- a) 58,645m² office floorspace (E(g)(i));**
- b) 15,270m² research & development / industrial processes floorspace (E(g)(ii&iii));**
- c) 64,514m² manufacturing / warehousing floorspace (B2/B8).**

2. This will be provided from the following sources with further details set out in Table 7.1 of this Local Plan:

- a) Completions 2020-2023;**
- b) Outstanding permissions at 31 March 2023;**
- c) Strategic Sites allocated in the Local Plan;**
- d) Site allocated for employment in the Local Plan.**

Supporting text

7.25 The purpose of this policy is to set out employment land provision figures for the City and thus provide 7,000 new jobs over the plan period.

7.26 The completions in the first three years of the plan period show a small overall loss. There was a small net gain in office E(g)(i) and research and development E(g)(ii) floorspace over the period of 2020-2023 through the construction of new offices and research and development facilities, and a loss of office floor space to student accommodation and to C3 dwellinghouses. Portsmouth saw a net loss of manufacturing and warehousing (B2 and B8) floorspace through changes of use including to a gymnastics facility and retail use.

7.27 New office floorspace is allocated on two strategic sites in the Local Plan. Firstly, Lakeside where the new floorspace will expand the City's premier office location. If there is not sufficient developer interest in the office allocation, the strategic site policy PLP5 sets out the requirements for gaining approval for other commercial uses on the site. Secondly, there will be a gross gain of 20,000m² in office floorspace in the City Centre with a known end user for half of the City Centre allocation. However, it is predicted that there will be a substantial loss of low quality office floorspace in the City, much of it under permitted development rights. This explains why the net figure for new offices in the City Centre, at 1546m², is so low. Full details are set out in the strategic site allocation policy PLP6.

7.28 A new marine hub at Tipner West and Horsea Island East that makes full use of the deep water access will provide a substantial quantum of new business floorspace in line with City Deal¹²⁷. Full details are set out in the strategic site allocation policy PLP3.

7.29 Land West of Portsdown Technology Park on the top of Portsdown Hill is a predominantly brownfield site suitable for the provision of new research and development premises in the defence sector. Full details are set out in site allocation policy PLP10.

Safeguarding Employment Land

Introduction

7.30 The supply of new employment land in Portsmouth is limited and so it is important to safeguard existing premises that are fit for purpose. However, the City Council does recognise the need for flexibility in the supply of employment land in order to respond to changing business requirements.

Development Management Policy PLP26: Safeguarding Employment Land

- 1. Proposals for the redevelopment of existing employment premises that provide improved employment accommodation, make more efficient use of land and provides a similar number of jobs will be encouraged.**
- 2. Development proposals for the change of use of land and/or premises allocated, currently used or last used for employment purposes to non-employment purposes will only be permitted where it has been demonstrated that the land or premises is not fit for purpose for employment. This will need to be demonstrated through a robust marketing campaign of at least six months, which clearly demonstrates that there is no market demand for the business premises or land. Details of marketing requirements are set out in Appendix 4 of this Local Plan.**
- 3. Where it is clearly demonstrated that the site is no longer fit for purpose and that there is no market demand for the business premises or land for employment, other commercial uses that are appropriate to the location should be considered in the first instance. These uses will be expected to provide jobs of similar quality and quantity as those which previously existed. Only if another type of economic development cannot be found which provides similar quality and quantity of employment opportunity, will other uses such as housing then be considered.**

¹²⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/256460/2013111_Southampton_and_Portsmouth_City_Deal_Document_and_Implementation_Plans.pdf

4. Development proposals that would result in the loss of marine business premises on waterfront sites will be refused.

Supporting text

- 7.31 The purpose of this policy is to safeguard all existing and allocated employment sites that are fit for purpose from redevelopment to other uses particularly housing.
- 7.32 The Local Plan evidence base identified a number of existing employment sites, which had the potential for intensification. Such proposals would be welcomed on these and other sites that came forward particularly if the new premises would deliver enhanced sustainability criteria.
- 7.33 Any proposal to redevelop an existing or allocated employment site for non-employment uses must provide robust and credible evidence on viability and marketing that the site is no longer fit for purpose as an employment site. Policy PLP26 only safeguards existing premises for traditional employment uses namely offices, manufacturing and warehousing. The marketing requirements may be reduced on a pragmatic basis for change of use applications to other commercial uses that generate similar numbers of jobs and do not conflict with other Local Plan policies particularly town centre policies. Housing is not a commercial use notwithstanding that some employment is required for its construction.
- 7.34 Full details on the requirements of the marketing campaign are set out in Appendix 4 of this Local Plan. All applications that would result in the loss of employment floorspace must comply with all parts of the Appendix and thus prove through an active and exhaustive marketing exercise that the site is no longer fit for purpose as an employment site.
- 7.35 The marine and maritime industry has specific land and locational requirements. All employment premises on waterfront sites, particularly those with deep-water access, will be protected in the Local Plan for marine related employment and associated uses in order to support the further development of the marine and maritime economy. It should be noted that Policy PLP36 requires development to avoid adverse impacts on the functionality of marine and maritime related uses within the designated Coastal Zone.

Employability & Skills

Introduction

- 7.36 The Economic Development and Regeneration Strategy recognises the need to improve skills and access to jobs for people in the City. Policy PLP27 along with the Achieving Employment and Skills Plans Supplementary Planning Document (SPD)¹²⁸ seeks to raise the employability and skills levels in the City through the planning system. This will be progressed collaboratively with the many organisations working on skills and training in the City including Shaping Portsmouth partnership.

¹²⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Achieving-Employment-and-Skills-Plans-Supplementary-Planning-Document.pdf>



1. Development proposals will be permitted where they, as relevant, at both the construction and occupation stages of the scheme:

- a) Raise local skill levels and increase employability as demonstrated in an Employment and Skills Plan;**
- b) Tackle skill shortages in existing and potential business sectors particularly advanced manufacturing and engineering including marine and space businesses, life sciences, creative industries and sustainable construction methods;**
- c) Address barriers to employment for economically inactive people including those with protected characteristics, such as the provision of sustainable transport; and**
- d) Provide or contribute to childcare facilities within or in close proximity to employment sites.**

2. Planning applications should where relevant have regard to the Achieving Employment and Skills Plans SPD or future equivalent both at the construction and occupation stages of the development.

Supporting text

7.37 The purpose of this policy is to raise skill levels and reduce barriers to employment for people living in Portsmouth so that they can access local jobs.

7.38 Advice should be sought from both the local planning authority and the Council's Economic Growth team at the earliest opportunity on measures relevant to the scheme. All proposed measures should be set out in a Skills and Employment Plan in line with key performance indicators and this should be agreed in writing at least six months before commencement of development.

7.39 This policy is relevant to all housing schemes of more than thirty homes at the construction phase of the development and all commercial schemes that would provide more than one thousand square metres of new commercial floorspace at the occupation stage of the development. For housing schemes this policy is relevant to the construction stage of the development. For commercial development it is relevant at both the construction and occupation stages. The scale of skills and employability measures will be proportionate to the scale of the development.

7.40 Getting to work can be a barrier to work for some people. There are multiple barriers to work, which can affect different groups of people in different ways. The characteristics that are protected by the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership (in employment only), pregnancy and maternity, race, religion or belief, sex and sexual orientation. Sustainable transport measures should be provided as relevant in line with Policy PLP47: Movement and Transport and Local Transport Plan 4.

Town Centres

Introduction

7.41 Portsmouth City Centre, Gunwharf Quays, Southsea Town Centre and the City's other high streets are hubs for economic, social and cultural activity. The City Centre and Gunwharf Quays are primary economic centres on the south coast, with the latter benefitting from its waterfront setting, and both are key transport hubs. Southsea Town Centre, and City's District, Local and Neighbourhood Centres provide an essential, accessible network of shops, services and facilities for the City's communities.

7.42 There has been significant change to the retail market in recent years, due to the online retail shift accelerating and combining with the wider economic impacts of the Covid-19 Pandemic and Brexit. The Economic Development and Regeneration Strategy highlights the City Council's intention to revitalise the City Centre and high streets by re-purposing and diversifying town centres. The City Council has spearheaded regeneration in its town centres with two grants awarded from the Government's Future High Streets Fund, totalling £7million. The fund aims to create attractive, safe and enjoyable places for people to meet, rest and spend time while they are in the City Centre. It will deliver major improvements at the northern end of Commercial Road through enhanced public realm better connectivity, greening, seating and opportunities for play, to support economic growth. In addition, significant development is planned for the City Centre as part of the Strategic Site Allocation Policy PLP6 Portsmouth City Centre, helping to meet development and local needs, and strengthening the City Centre's identity and vitality. This includes a large number of new homes, business space, social and leisure uses and community facilities.

7.43 Regeneration objectives are also being taken forward in Fratton District Centre, where the Council acquired the Bridge Centre in 2023 with one of the Future High Streets Fund grants. This will enable improvements to the high street and access, including pedestrian routes and cycleways, new homes and employment opportunities. The Bridge Centre will host an enterprise centre of small, low cost offices and co-working spaces, and support local start ups, small businesses and community initiatives.

7.44 At Gunwharf Quays, the landowner Landsec have unveiled plans for a £45 million investment to build on its existing strength as the UK's leading waterfront outlet destination and grow its offer as a unique day out experience. Planning applications will seek to enhance public spaces and shopfronts, with improvements to landscaping, greening, seating and access, and new kiosks, increasing opportunities for leisure and dwell time. A program of solar panel installation is expected to boost the centre's energy efficiency. Landsec have also stated an ongoing commitment to working with local communities and partners, to enhance the social value and links that Gunwharf Quays can bring to the City.

7.45 To maintain and enhance the City's centres as vibrant and attractive places for residents, businesses and visitors, adaptation is needed that maximises potential to support growing parts of the economy. This will enable the City and Town Centres to remain dynamic and flexible in the context of change and allow their continued vitality through the plan period. Recent changes have seen an expansion of 'experience' focused activity, and with it an increased demand for leisure and culture related uses. Portsmouth's Retail and Leisure Study Update (2024) shows that spending from the

leisure and culture sector has grown. The Study projects expected spending growth of around 7.5%, or £34 to £35 million, available to support new leisure and cultural services in the City over the next 10 years. The town centres within the City play an increased role as spaces for social interaction, leisure and entertainment. Opportunities for leisure, culture and arts uses, restaurants, cafes and bars, events and markets, that bring people into the centres, support footfall, help create vibrant and diverse commercial cores, and complement the continuing retail function with town centres, will be encouraged. Portsmouth's Market Strategy and Action Plan 2023-2028¹²⁹ highlight strategic objectives and actions to explore opportunities to strengthen and enhance existing markets and explore opportunities for new markets to add value to the economic, social and cultural fabric of the City.

- 7.46 A key opportunity and part of the City's cultural and leisure offer relates to maximising the potential of its island City geography and identity, waterfront location and rich maritime heritage. This is covered in detail under Policy PLP30: Cultural and Visitor Economy, which seeks to strengthen and support the growth of creative, cultural and visitor related business and activities. The Plan seeks to celebrate and capitalise its cultural and visitor economy as a force for regeneration in its centres and in other identified locations.
- 7.47 The Retail and Leisure Study Update 2024¹³⁰ shows a projected increase in the need for retail floorspace of between 6,300m² and 6,700m² over the next ten years of the plan period. The majority of this (4,200m² to 4,600m²) is capacity to support comparison goods floorspace growth within the Commercial Road area of the City Centre and at Gunwharf Quays. The Study shows very limited projected growth for convenience goods floorspace over the next ten years.
- 7.48 Local authorities are required to define a network or hierarchy of town centres and promote their long term vitality and viability. This is part of a positive approach to their growth, management and adaptation that can respond to change in the retail and leisure sectors and wider economy. Planning policy should identify the extent of town centres and primary shopping areas and make clear the uses suitable in such locations. In Portsmouth, primary shopping areas are referred to as Core Commercial Areas, and these reflect the diversity of uses that will together create vibrant and sustainable places for the plan period and beyond. The hierarchy of identified centres in Portsmouth is illustrated in figure 7.2 and a description of each centre is set out in Table 7.2.
- 7.49 An approach is also set out to enable assessment of development proposals for main town centre uses located outside existing designated town centres. This is to ensure that development is located as sustainably as possible, and maintain vibrant town centres. There are some significant out of centre developments in Portsmouth offering a mix of outlet and warehouse retail, leisure and entertainment facilities. This includes Port Solent (which also includes an element of small, local shopping provision), Portsmouth Retail Park at North Harbour, Ocean Park in Copnor and the Pompey Centre in Fratton. The Council will resist proposals for significant out of centre development of town centre uses, unless it is satisfied that the sequential test and impact assessment, as set out below, have been met.

¹²⁹ <https://democracy.portsmouth.gov.uk/documents/s48818/markets%20action%20plan%20Oct%202023.pdf>

¹³⁰ <https://www.portsmouth.gov.uk/newlocalplanevidencedoco>

7.50 Development of main town centre uses outside of centres designated in Portsmouth's town centre hierarchy will need to be adequately assessed to ensure a town centre first approach, as outlined in national planning policy. The intention is to maintain the vitality of town centres and their function in the hierarchy and safeguard their role and value to the local community. For planning applications for main town centre uses on out of centre sites, there is a requirement for a thorough sequential assessment of alternative sites within centres, and edge of centre locations, before out of centre sites can be considered acceptable. Preference is given to accessible sites that are well connected to a town centre. In addition, an impact assessment in an additional method of appraising planning applications for retail and leisure development outside town centre and not in accordance with an up to date plan, where floorspace is over 2,500 m². Further detail of the sequential test and impact assessment can be found in the National Planning Policy Framework and supporting Planning Practice Guidance on Town Centres and Retail.

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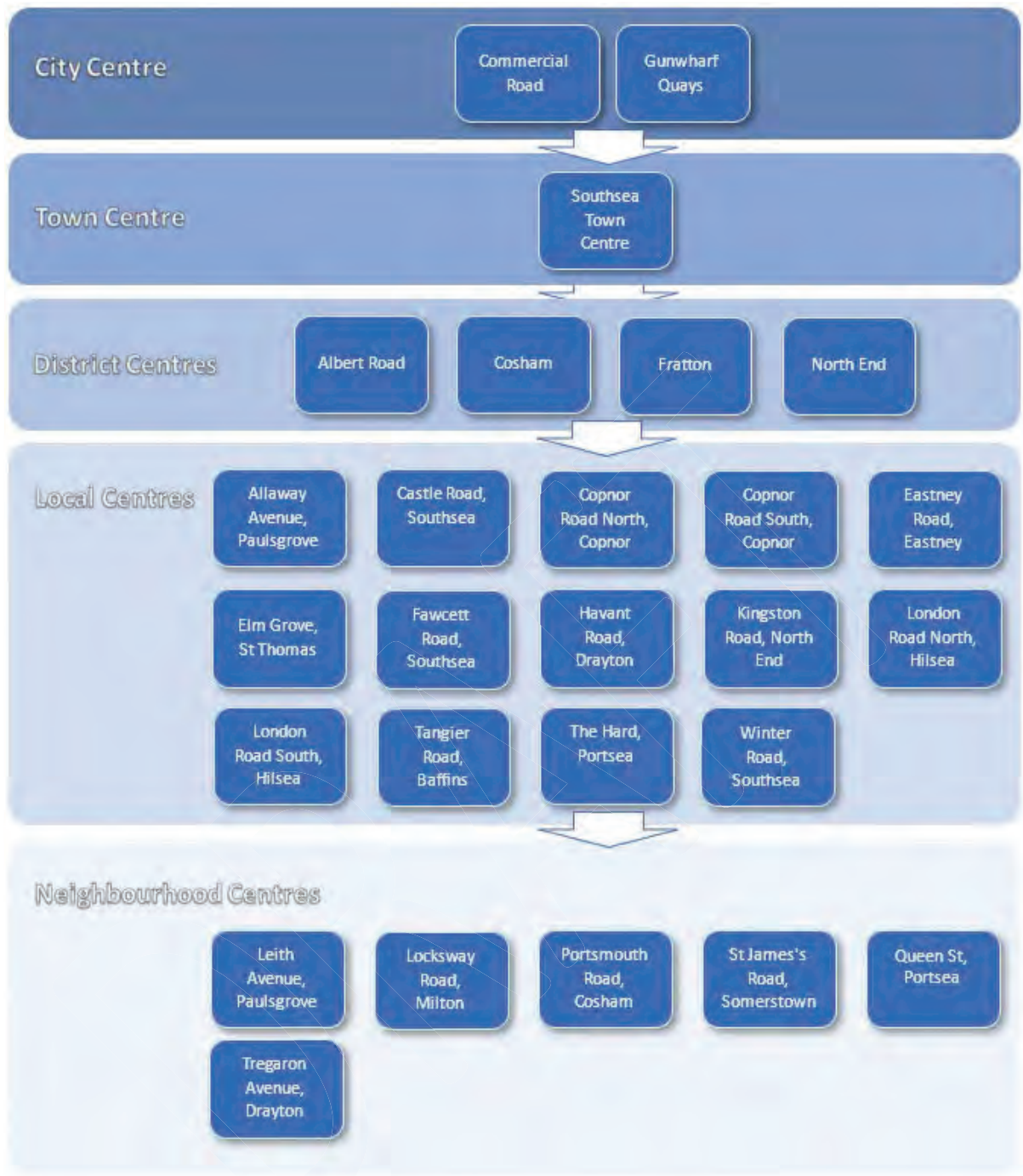


Figure 7.2: Portsmouth's Town Centre Hierarchy

| Hierarchy level of centre | Centre name(s) | Description (role, function) |
|---------------------------|---|--|
| City Centre | | The City Centre is the primary area of economic growth, development of town centre uses and high density residential, taking in two separate centres of Commercial Road and Gunwharf Quays. These centres play distinct roles. |
| | Commercial Road | Provides a concentration and range of commercial uses, including shops, business services, cultural and civic uses, and a regular market. Commercial Road serves the local community, the City as a whole and the wider area. In future it will host a thriving retail and business offer, with enhanced leisure and cultural facilities to support existing institutions such as the Guildhall and the New Theatre Royal. The Commercial Road area takes in Guildhall Square and Guildhall Walk, which play an important role in maximising opportunities for and growth of culture and creativity in the City. |
| | Gunwharf Quays | Provides a unique waterfront setting and is the south coast's leading designer shopping outlet, home to over 90 brands and a variety of restaurants, bars and cafes, and a multiplex cinema. It is a vibrant shopping and leisure destination, pulling people in from outside the City, supporting the visitor economy and trade generated from the marina and cruise industry. |
| Town Centre | Southsea | Southsea provides a wide variety of shops, services and restaurants to its local area and more widely across the City. It benefits from an attractive character, a good range of independent business including a monthly market, and a location by Southsea Common. Southsea will grow as a thriving town centre, where redevelopment of two anchor department stores will add to the vitality of the centre, while maintaining its existing character. |
| District Centres | Albert Road, Fratton, North End and Cosham | Each has a distinct character and provides a good range of shops, services, community and in some centres, cultural facilities, to serve the City's communities. |
| Local Centres | Allaway Avenue, Castle Road, Copnor Road North, Copnor Road South, Eastney Road, Elm Grove, Fawcett Road, Havant Road, Kingston Road, London Road North, London | These centres play an important role in serving key day to day shopping and service needs of the local community, with a number of small scale shops and services on offer. They help ensure accessible provision of essential goods and services. |

| | | |
|------------------------------|--|---|
| | Road South, Tangier Road, The Hard, Winter Road | |
| Neighbourhood Centres | Leith Avenue, Locksway Road, Portsmouth Road, Queen Street, St James Road, Tregaron Avenue | These small centres provide an element of local shops and/ or service provision to the local community. Along with local centres, they provide essential goods and services to their immediate neighbourhood. |

Table 7.3. Town Centre Hierarchy descriptions

7.51 The Local Plan takes a positive approach to planning for its town centres by:

- Defining a hierarchy of centres including their boundaries and where relevant Core Commercial area as defined on the Policies Map;
- Providing direction for growth and development and suitable uses that contribute to the vitality and viability of the centres;
- Highlighting planning requirements for 'out of centre' proposals, as above, as required by national policy;
- Allocating the Strategic Site of Portsmouth City Centre for mixed use development, to meet the scale and type of need for town centre uses and to identify distinct areas within the City Centre.

7.52 Evidence to support city, town, district and local centre policy and designations has been collated as part of the preparation of the Local Plan and includes the Retail and Leisure Study Update¹³¹ (2024) and the Town Centre Assessment (2024)¹³². These provide detailed analysis of each centre, supporting the boundaries on the Policies Map and the role of each centre in the town centre hierarchy.

Development Management Policy PLP28: Town Centres 

- 1. Development proposals that support the growth and development of identified centres in Portsmouth's Town Centre Hierarchy, as the preferred location for main town centre uses, will be permitted.**
- 2. Proposals for new development should be of a size, scale and type appropriate to the centre's position in the town centre hierarchy, as shown in Figure 7.2.**
- 3. Development proposals should provide main town centre uses within the City, town, district, local and neighbourhood centres, that contribute positively to the function, vitality and viability of the centre. Development proposals for main town centre uses should be designed to be welcoming and accessible to everyone.**
- 4. The Core Commercial Area, as identified on the Policies Map, should be promoted and enhanced as the heart of the centre within the town centre hierarchy. It will be the focus for retail, commercial, leisure, culture, civic and service uses. At ground floor level within the Core Commercial area, active street frontages will be strongly encouraged.**

¹³¹ <https://www.portsmouth.gov.uk/newlocalplanevidencedoco>

¹³² <https://www.portsmouth.gov.uk/newlocalplanevidencedocg>

5. Development of a range of town centre uses or other uses may also be considered acceptable in the Core Commercial Area where it meets the following criteria:
- a) It makes a positive contribution to the vitality of the Core Commercial Area and centre overall;
 - b) It contributes to creating an attractive and vibrant environment through a wide range of complementary uses;
 - c) It provides an active frontage at ground floor level, with immediate access to the street;
 - d) It generates pedestrian activity by being open for substantial periods of time to visiting members of the public;
 - e) There are no significant harmful impacts on the function, either individually or cumulatively, on the vitality or viability of the core frontage or Core Commercial Area; and
 - f) It provides a shopfront or other frontage with a well designed and appropriate display window.
6. Markets should be retained and enhanced, and new markets supported, as part of a diverse independent retail and business offer.
7. Development proposals that would result in the loss of a town centre use in the Core Commercial Area of an identified centre, where one exists, or within the boundaries of an identified Local or Neighbourhood Centre will only be permitted after the premises have been marketed for six months in line with Appendix 4 of the Local Plan. This will need to show that there is no market demand for the premises in its existing use or for another retail, commercial, leisure, cultural and service use.
8. Development proposals for a variety of uses including town centre uses and housing on land and/or premises that is within an identified centre but outside the Core Commercial Area will be permitted. Development of new homes and other residential uses, including as part of mixed use proposals, will be acceptable, to maximise use of land where there is a high level of accessibility to key services and transport links. Retail, commercial, leisure, cultural and service uses will be encouraged at ground floor level where there is market demand. Where development proposals include such uses at ground floor level, their frontage should provide a well-designed and appropriate display window.

Supporting Text

7.53 The purpose of this policy is to set a positive approach to development of main town centre uses in accordance with the town centre hierarchy and ensure vibrant and viable town centres. The policy directs proposals for new town centre uses to the town centres and identifies the Core Commercial Area as the place where retail, commercial, leisure, cultural and service uses should be focused and retained. The policy provides criteria to

enable consideration of development of other uses where they make a positive contribution to the vitality and viability of a designated centre.

- 7.54 To facilitate vibrant and viable town centres and high streets, the policy seeks to encourage a variety of active uses at ground floor level, within the Core Commercial Area. This helps support activity and animation in the heart of centres, and promotes access and connectivity which are key to healthier communities and greener travel patterns. Cultural and community uses, for example libraries, can be integral to high streets, with an example in Southsea Town Centre. The location of this type of facility can increase footfall and linked trips, and with it enliven and encourage use of nearby businesses.
- 7.55 Town centres and high streets should be welcoming and accessible to everyone, and the design of new development and public realm should give careful consideration to enabling easy access to people with mobility difficulties, including disabled people and parents and carers with pushchairs. Government guidance on access to buildings and accessible pedestrian and transport infrastructure, including relevant buildings regulations, should be taken into consideration at the design stage.
- 7.56 In addition to this policy, further detail is included in the Strategic Site allocation of Portsmouth City Centre on the mix of uses anticipated, to meet the scale and type of identified need, and to identify distinct areas within the City Centre.
- 7.57 To help deliver a welcoming and attractive environment in the City's centres, development should seek new and enhanced greening of both buildings and public spaces, and provide outdoor seating where appropriate. This takes forward the Plan's objectives on Greening the City, positively impacting biodiversity and urban cooling, whilst helping to make town centres healthier, more attractive and inclusive.
- 7.58 Retail, commercial, leisure, cultural and service uses are acceptable uses in the City's town centres, falling across Use Classes E: Commercial Business and Service, F1: Learning and Non-Residential Institutions and F2: Local Community. This diverse range of uses is considered to enable management of town centre development that can adequately respond and adapt to market change.
- 7.59 The policy seeks to retain and enhance markets, which make a valuable contribution to the vitality and viability of town centres, adding diversity, increasing footfall and potential linked trips. Markets enable local and independent small businesses to trade in the City's centres and can act as a significant attraction to draw people in. Pop-up markets can revitalise vacant spaces within the City's centres, particularly where development is proposed and/ or approved but has yet to begin. Markets are a feature on Commercial Road in the City Centre, on Palmerston Road, Southsea and in Cosham. Two of these markets are supported by the Council in partnership with local businesses and business groups. Objectives, opportunities and actions to enhance and promote markets are detailed in Portsmouth's Market Strategy and Action Plan 2023-2028.
- 7.60 The policy seeks to ensure that there are no significant harmful impacts, either individually or cumulatively, on the function or the vitality or viability of the core frontage or wider Core Commercial Area. This should ensure that the quantum of floorspace and shop front for town centre uses is retained at ground floor level, and that the prevalence

and concentration of other uses do not undermine the role and function of the core frontages or the Core Commercial Area as a whole. These areas should maintain a very high proportion of main town centre uses, as defined at criteria 2 of PLP28: Town centres. It is noted main town centre uses fall across Use Class E: Commercial, business and service and Use Class F.1: Learning and non-residential institutions. The policy sets out that any development proposal involving a loss of a town centre use, that fall outside of Permitted Development Rights, will need to be supported by marketing evidence to show there is no market demand for the premises in its existing use, or for another retail, commercial, leisure, cultural and service use.

7.61 A broad range of Permitted Development Rights have been introduced by the Government to support certain changes of use within town centres, with the intention of allowing a degree of flexibility in town centres, and to help avoid buildings lying vacant. These are outlined in national planning guidance on town centres and retail¹³³. Class MA of the Town and Country Planning (General Permitted Development etc.) (England) Order 2021 allows unused commercial buildings to be permitted for residential use via a fast-track approval process. The Council can only assess prior approval applications based on specific considerations including flooding, noise from commercial premises and adequate light to habitable rooms. Other site-specific issues that Councils can take into consideration include the impact of the loss of a ground floor Class E use in Conservation Areas, and the impact of the loss of a health service.

7.62 Town centres offer sustainable locations, with easy access to a range of shops, services and amenities, and in some centres, good transport links. They are therefore suitable locations to maximise and make efficient and effective use of land and increase the intensity of development for main town centre uses and residential. Residential development should be designed in accordance with Policy PLP22: Residential Density and PLP23: Space Standards.

Small Local Shops

Introduction

7.63 Portsmouth's hierarchy of town centres provides a network with a variety of functions in providing shopping, service, culture and leisure opportunities. These support a diverse economy, sense of place and shopping and service facilities that meet a range of needs.

7.64 Small scale shops located outside of the town centre hierarchy also play an important role in providing for the day to day shopping and service needs of residents, particularly in areas poorly served or without easy access to identified centres. These essential local shops are important in supporting access to food and other essential goods, healthier lifestyles and greener travel choices, through encouraging walking and cycling, and are key to sustaining and enhancing happy and healthy communities.

Development Management Policy PLP29: Small Local Shops

1. Development proposals for small local shops or services outside the City, Town, District, Local and Neighbourhood Centres will be permitted provided that:

- a) The net sales area is less than 150m²;

¹³³ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

- b) **The shop will mostly sell essential goods and provide services that meet day to day shopping and service needs, including but not exclusive to food, to visiting members of the public;**
 - c) **There is no other such facility within a reasonable walking distance (approximately 400 metres); and**
 - d) **It provides an active shopfront or other frontage with a well-designed and appropriate display window.**
- 2. Development proposals that would result in the loss of a small local shop outside the City, Town, District and Local Centres will be resisted, and will only be allowed where:**
- a) **There is no market demand for the premises in its existing use or for another retail, community, cultural or commercial use that supports the local community. Evidence should show the property has been marketed for six months in line with Appendix 4 of the Local Plan; or**
 - b) **There is an alternative local shop or service use that meets key day to day needs of the community within close proximity (around 400 metres).**

Supporting Text

7.65 The purpose of this policy is to support the development and retention of small-scale shops that meet day-to-day shopping and service needs and thus support sustainable local communities. Small local shops and services include, but are not limited to, convenience stores, newsagents, post offices, pharmacies, hairdressers and cafes.

7.66 Small local shops outside identified centres, as defined in Policy PLP28 Town Centres and shown in Figure 7.2. Portsmouth's Town Centre Hierarchy, provide an important service for local communities in helping to meet day to day shopping and service needs. They are particularly valuable for people with accessibility or mobility issues, reducing the need to travel by car for everyday essentials, including food and healthcare, and promoting greener travel patterns and healthier communities. Therefore the policy seeks to support development of small local shops that have a net sales area less than 150 m². This is considered a reasonable amount of floorspace with regard to the typical size of local shops across Portsmouth, and a level that is considered to avoid potential for significant detrimental impacts on the vitality and viability of centres identified in the City's town centre hierarchy. The policy also requires assessment of whether there is another small local shop or services within a reasonable walking distance, defined as approximately 400 metres. Assessment of this walking distance should be based on accessible pedestrian routes.

7.67 The policy also resists the loss of these key local facilities unless a lack of market demand can be demonstrated through submission of appropriate marketing evidence or where there is an alternative shop that meets key day to day needs of the community within close proximity namely a maximum of 400 metres. This should again be based on accessible pedestrian routes and should not result in areas of deficiency or lack of easy access to local shop provision.

7.68 The floorspace threshold of 150 m² is considered a level low enough that it would not adversely affect the vitality and viability of city, town, district or local centres. Details of the sequential test and impact assessment can be found in national planning policy.

7.69 Development of a small shop outside a designated centre is anticipated, in most cases, to fall under Class F.2. Local Community of the Use Classes Order. However, if it is appropriate to grant planning permission for a small scale service use that falls under Class E, due to the number of uses falling within that Use Class, it may be necessary to restrict the permission to a specific provision of Class E through removal of permitted development rights. This is to ensure that the use continues to sell essential goods to meet the key day to day needs of the community, and does not, through a change of business type within Class E, create adverse impacts on an identified centre.

The Cultural and Visitor Economy

Introduction

7.70 Portsmouth's City Vision 2040 sets out the aspiration for Portsmouth to be a City with a thriving economy and rich in culture and creativity. This policy seeks to take forward that vision, to maximise the opportunities afforded by the City's waterfront location and draw on its rich heritage. This will support and grow a distinct cultural and visitor economy that provides a range of social, economic and well-being benefits for its residents and for visitors, and enable culture led regeneration in the city.

7.71 The Council's Economic Development and Regeneration Strategy outlines that to create a thriving and competitive business environment it will invest in and strengthen the visitor and creative industries sector, and this is key to diversifying the local economy and revitalising and regenerating the City Centre and other parts of the City. The definition of the cultural sector and creative economy can be found in the Cultural, Creative and Visitor Economy Topic Paper, and broadly the cultural sector includes: arts, film, TV, music, radio, photography, crafts, museums and galleries libraries and archives, cultural education, and operation of historical sites and similar visitor attractions. Creative industries have their origin in individual creativity, skill and talent, and include a number of overlapping sub-sectors with the cultural sector, as detailed to in the Topic Paper

7.72 Nationally, the cultural sector and creative industries are key drivers of economic growth, with creative industries growing at almost 1.5 times the rate of the wider UK economy over the past decade. The Department for Culture Media and Sport have ambitious plans for the sector's growth, by growing creative industries in clusters by an extra £50 billion, delivering careers that build on talent to support additional jobs and intensifying this sector's ability to enrich our lives and create pride in place¹³⁴.

7.73 Portsmouth has seen a significant level of growth in creative industries when compared to other economic sectors, with employment expansion of around 10% per year. This level of business growth is strong and is occurring faster than the UK average, although the City is not yet a recognised creative cluster. Creative clusters are defined as 'agglomerations of creative businesses and workers that collaborate and compete with

¹³⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1162721/Creative_Industries_Sector_Vision_accessible_version_.pdf

each other'. Southampton and Chichester, which sit either side of the City, are recognised high growth creative clusters.

- 7.74 Evidence shows that the majority of creative businesses in the City are small, recent start-ups and that 36% creative business owners surveyed were graduates from the University of Portsmouth. The University is key in developing the future of cultural and creative industries, in boosting innovation, entrepreneurship, skills and talent and strengthening the City's cultural economy. The Council's Tourism and Visitor Economy Strategy¹³⁵ (2023-2028) highlights the importance of tourism in the local economy and in Portsmouth's cultural sector. Pre-pandemic, tourism was valued at around £600 million a year, it attracted nearly 15 million visitors (2019) and supported around 12,000 jobs in the city. The strategy covers a post-pandemic recovery plan, and then growth of the visitor economy to increase its value and manage and develop the City's brand and destination offer. While an adequate supply of hotels and visitor accommodation is core to strengthening the overnight and weekend visitor economy, there is an integral link with the cultural economy, including the city's wide array of museums, attractions and festivals, and with culture led regeneration.
- 7.75 Portsmouth's maritime location, heritage and identity are integral to its wide range of cultural and leisure attractions including heritage, arts, theatres, museums and two piers. This includes the Historic Dockyard taking in the Mary Rose, HMS Victory, HMS Warrior, the National Museum of the Royal Navy, the D-Day Story, Charles Dickens Birthplace Museum, Portsmouth Museum and Art Gallery, Hotwalls Studios, Gunwharf Quays and Spinnaker Tower, theatres and a number of historical attractions, parks and gardens.
- 7.76 The Council actively supports creative and arts-based small and medium size businesses and activities. Hotwalls is an example of historically sensitive regeneration of the Grade I listed and scheduled Point Battery and Barracks, which form part of the City's original military defences. It has been transformed by the Council with Coastal Communities Grant funding into an arts hub, providing affordable studios, workspaces and exhibition space for the local creative community and businesses, and a unique visitor attraction where workshops and interaction with artists and makers can take place.
- 7.77 Portsmouth also hosts major festivals and events, such as Victorious, which attracted nearly 185,000 visitors and generated £19.5 million in 2022, the European Kite Championships, the America's Cup World Series and the Great South Run. Fratton Park is home to Portsmouth Football Club and has been since 1899. It has capacity for over 50,000 supporters and hosts regular matches, making it the largest sports venue in the City. Events such as these have significant potential to stimulate the City's economy and will be positively supported and managed by the City Council.
- 7.78 Portsmouth maritime heritage and culture creates a distinct pride of place and local identity. Portsmouth's Heritage Strategy (draft, 2024-2029) sets a vision to create a City where heritage is understood, celebrated and integral to the City's life and success. It provides details about opportunities to reinforce and develop historic identify, invest in historic assets and to ensure heritage is an integral part of the city's economic success. It

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<https://democracy.portsmouth.gov.uk/documents/s43065/Appendix%201.%20Tourism%20and%20Visitor%20Economy%20Strategy%202023-2028.pdf>

also seeks to ensure people are engaged and actively involved in the heritage environment, assets and stories. This engagement can be a tool to tackle low engagement and socio-economic deprivation, and work done through local cultural enterprises has sought to both increase access to museums, galleries and other cultural institutions to a wider range of the City's residents and to take culture to the community, as a form of outreach. This can contribute to positive social and well-being outcomes and demonstrates the holistic role of heritage and culture in the City.

7.79 Funding of £650,000 in October 2023 from the Arts Council England was awarded to Portsmouth Creates, a partnership including the City Council, the University of Portsmouth, Solent Local Enterprise Partnership, the Cultural Collective and various community organisations. This will drive growth, develop talent and improve inclusivity across the creative sector, through an ambitious programme to build capacity, creative pathways and opportunities for young and disadvantaged people via mentoring and apprentice programmes.

7.80 Entertainment venues such as theatres, cinemas, music and performance spaces across the City, and restaurants, pubs, bars and clubs all make up the City's evening and night time economy. These are important to Portsmouth's as a thriving and vibrant City and are needed to support the cultural and visitor economy.

7.81 There has been gradual growth and expansion of hotels in the City, and appropriate capacity and diversity of high quality hotels to meet varying budgets is important to supporting the tourism and the visitor economy, including expansion of the cruise ship industry. Portsmouth's Hotel Development Assessment¹³⁶ (2019) shows demand for budget and full service hotels alongside boutique hotels in the plan period although need may need to be reviewed in light of the pandemic and current economic circumstances and reflected in development proposals coming forward.

Strategic Policy PLP30: Cultural and Visitor Economy



1. **Development proposals that maximise the potential of the cultural and visitor economy and drive forward culture led regeneration will be encouraged. This includes a range of culture, leisure, entertainment and visitor attractions and accommodation, and the development of creative industries.**
2. **Opportunities for development and enhancement should be maximised in the centres identified in the town centre hierarchy illustrated in Figure 7.2 particularly in the Core Commercial Area and Guildhall Quarter of the City Centre, as shown in Figure 4.5. In addition, opportunities may be located at and in close proximity of existing major visitor and cultural attractions.**
3. **Development proposals for culture, leisure, entertainment, visitor attractions and accommodation and creative industries will be permitted where they meet the following criteria:**
 - a) **The proposed development is of an appropriate type, scale and design to complement and support the role of the existing centre or area, and enhance**

¹³⁶ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/PORTSMOUTH-HOTEL-DEVELOPMENT-ASSESSMENT-FINAL_compressed.pdf

its character, and respond sensitively to the significance of the historic environment;

- b) The proposed use would improve vitality and viability of the area by retaining an active and welcoming frontage or entrance at ground floor level, attracting pedestrian activity and encouraging linked trips;
 - c) Ensure effective access arrangements that are safe and suitable for all users, including local pedestrian and cycle links; and
 - d) The proposed use would not have a harmful impact on the amenity of nearby occupiers due to noise, odour, disturbance or light pollution.
4. Pop up and temporary uses will be encouraged where they help animate and activate vacant premises and sites for a period prior to permanent re-occupation or redevelopment, and where they meet the above criteria.
 5. Access and connections to and between cultural facilities and visitor attractions and the City and town centres should be improved to maximise usage and ensure engagement with as wide an audience as possible. This may be through enhancement to building design, public realm, signposting and wayfinding.
 6. Development proposals that would result in the loss of a use contributing to the cultural or visitor economy, such as culture, leisure, entertainment, visitor attractions and accommodation, will be resisted and will only be allowed where there is no market demand for the premises in its existing use, or in a related use.
 7. Development of other, non- cultural or visitor economy uses adjacent or in the immediate vicinity of cultural or visitor attractions or uses should not compromise or undermine the feasibility or continuing operation of these attractions or uses.

Supporting Text

7.82 The purpose of this policy is to set out a positive approach to supporting the City's cultural and visitor economy and to support the Imagine Portsmouth's 2040 Vision to be a City rich in culture and creativity.

7.83 The cultural and visitor accommodation uses covered by this policy include a number of town centre uses, and development should accord with this policy, Policy PLP28 Town Centres and where relevant, Policy PLP6: Portsmouth City Centre. This supports and enables diversification, the long term viability of centres in the town centre hierarchy and helps capitalise a growing part of the economy to enable regeneration. Opportunities for development are therefore focused on the town centre hierarchy, but also at and in close proximity to existing major visitor and cultural attractions. These are places where there is an existing cultural or heritage activity or hub, and where further development, of an appropriate type and scale which complements existing use(s) and the surrounding area could be beneficial. The impacts of proposals on these areas, particularly where they relate to trip generation and design, should be carefully considered. Existing major cultural and visitor attractions, include but are not limited to: The Historic Dockyard and The Hard, Portsmouth Museum and Art Gallery, Old Portsmouth, The Hotwalls, Southsea Seafront including its two piers, beaches, castle and the D-Day Story and Aquarium, Wymering Manor in Cosham, and the Hilsea Lines.

- 7.84 The Seafront Masterplan SPD¹³⁷ highlights detailed guidance on how the Seafront, stretching from Old Portsmouth to Eastney, can be improved and conserved. This includes improvements to accessing the Seafront, the visitor experience, the public realm as well as maintaining its open character. As highlighted above, Old Portsmouth, the Hotwalls Studios, Southsea Seafront, Wymering Manor and the Hilsea Lines are particularly sensitive due to historic context and assets, and in these locations, development should be of an appropriate scale and design to conserve and enhance historic character. The City Council's Heritage Strategy (draft, 2024-2029) gives detailed information on the city's heritage environment and its wealth of historic asset.
- 7.85 The use of the term 'close proximity' in criterion 2 of Policy PLP30 will vary depending on the existing centre or visitor or cultural attraction, and the type of development proposed. It should generally be in the immediate area namely up to 300 meters radius, to help create a cluster or hub of activity. Development should not draw people and footfall away from an existing centre or attraction.
- 7.86 Criterion 6 of the Policy seeks to retain and protect against development resulting in the loss of uses that contribute to the cultural or visitor economy, including but not exclusive to culture, leisure, entertainment, visitor attractions and accommodation. For town centre uses located in identified centres Policy PLP28: Town Centres applies with regard to assessing loss. In these locations, planning applications should demonstrate premises have been marketed for six months in line with Appendix 4 of the Local Plan and show that there is no market demand for the premises in its existing use, or for another retail, commercial, leisure, cultural and service use. For development involving loss of these uses located outside the Town Centre Hierarchy, an assessment should be made on a case by case basis as to whether application of six months marketing evidence is necessary to demonstrate a lack of market demand. This assessment should include consideration of the size, type and significance of cultural or visitor economic use being lost, and the role it plays in a cluster or hub of cultural or visitor activity.
- 7.87 Criterion 7 seeks to ensure that development of other uses, that are not cultural or visitor economy uses, do not compromise existing cultural or visitor economy uses or activities. This helps avoid reverse sensitivity, where adverse impacts for occupiers of new sensitive or inappropriate development impacts on existing, lawful activities that are established in mixed use areas. The existing activity can then become vulnerable and be undermined, through amenity (including noise) complaints etc, from newly located activities and occupiers. Consideration should be given on a case by case basis to ensure appropriate location of other uses in the immediate vicinity of cultural and visitor economy uses, to safeguard the continuing operation of these attractions and activities, which are key to the City's economy.
- 7.88 As part of ensuring effective access arrangements, design and layout of sites should be considered, and a Travel Plan and Transport submitted for hotels and other major development that would generate significant trips and movement, in line with national policy.
- 7.89 Some major attractions in the city are relatively cut off and disconnected, and an approach to enhance connectivity, particularly for pedestrians and cyclists, should be sought to enable better access and links. This should be promoted at Gunwharf Quays and the Historic Dockyard, in terms of linkages with the City Centre, particularly the Guildhall and Commercial Road areas, and Old Portsmouth. This is also relevant to development at Fratton Park and Tipner West and Horsea Island East. This can be taken

¹³⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2021/10/173.48-Seafront-Masterplan_Accessible.pdf

forward through improved wayfinding and public realm, and where relevant, through creation of heritage and culture trails.

7.90 Cultural and community organisations can play a key role in engaging with part of the population where there are low levels of engagement and social deprivation. Opening up access and connections to and between cultural facilities and visitor attractions and promoting community engagement and active involvement can help improve quality of life, mental and physical health benefits for all. This should be promoted through development and partnership working with relevant cultural and community organisations.

DRAFT

Chapter 8 Climate Emergency

Introduction

8.1 Portsmouth City Council declared a climate change emergency in March 2019. This was in response to the serious impact that climate change will have on the City and the lives of its inhabitants. The Council then adopted a Climate Emergency Strategy that sets out how it intends to meet the objectives of the Climate Emergency Declaration. Table 8.1 sets out the Council's strategies including the Local Plan that address the climate emergency. Chapter 3 of the Local Plan contains Core Policy PLP2: Climate Emergency while more detailed aspects of policy relating to climate change adaptation and mitigation are set out in this chapter.

| How Everything Fits Together | | |
|---|--|---|
| Make Portsmouth a place that is fairer for everyone: a City where the Council works together with the community to put people at the heart of everything we do. | | |
| Make Our City Cleaner, Safer and Greener | | |
| Improving air quality by tackling congestion and parking issues and encouraging more people to walk, cycle and use public transport including park and ride | Engaging with communities and the Environment Agency so that the East Solent Coastal Partnership can build new sea defences protecting the City from flooding. | Encouraging people to keep Portsmouth clean and taking action where necessary to tackle problems like litter and dog fouling. |
| Make sure public spaces are greener, more sustainable and well maintained | Working to increase recycling and cut plastic waste | Encouraging road safety across Portsmouth |
| | Keeping weekly rubbish and fortnightly recycling collections | |
| Strategies addressing the Climate Emergency | | |
| Local Transport Plan | Local Plan | Energy and Water at Home |
| Air Quality Local Plan | South East Hampshire Rapid Transit | Cough Cough Engine Off |
| Citizen's Assembly | Local Cycling and Walking Infrastructure Plan | Carbon Reduction Strategy |
| Integrated Impact Assessment | Southsea Coastal Scheme | Portsmouth Port Carbon Neutral |

Table 8.1: Portsmouth City Council strategies that address the Climate Emergency

8.2 This chapter of the Local Plan includes seven policies relating to the climate emergency. The first two policies relate to water namely Policy PLP31: Flooding and Policy PLP32: Sustainable Drainage Systems (SuDS); this deals with both SuDS and other water retention measures in the City to minimise surface water run-off and its associated impacts. Policy PLP33: Sustainable Construction and Onsite Renewable Energy sets out how new development should be built in a sustainable way minimising environmental and carbon impacts. Policy PLP34: Renewable Energy relates to the provision of new renewable energy infrastructure in the City. Policy PLP35: Air Quality & Pollution sets out measures that development needs to take to ensure that development contributes to improving air quality in the City. Policy PLP36: Coastal zone sets out specific coastal

related landscape and use protections. The final policy on this chapter is on contaminated land, which is a longstanding issue in this long occupied City.

Flooding

Introduction

8.3 Portsmouth's low lying coastal location means that the City is susceptible to flood risk not only from tidal inundation, but also surface water, rising ground water levels and possible wastewater infrastructure overflow during extreme weather events. As an island, Portsmouth is bound on all sides by the sea and the fact it is heavily urbanised with significant levels of hard landscaping means flood risk is a significant risk.

8.4 Flood risk is typically defined using the Environment Agency's (EA) flood risk maps for rivers and sea, which indicates the predicted annual probability of flooding, from Flood Zone 1 (low risk) through to Flood Zone 3 (high risk) and also for surface water. The impacts of climate change are expected to increase flood risk in Portsmouth, as sea levels rise and winters become wetter with more intense rainfall events.

8.5 Large areas of the City, particularly those adjacent to the coastline, fall into Flood Zones 2 and 3 and are the areas that have the medium or highest probability of tidal flooding. Over the next 100 years, the extent of these flood zones is expected to expand. Current flood zones are illustrated in figure 8.1 and predicted flood zones in the City in 100 years' time are also shown in figure 8.1; these two maps show the dramatic impact that climate change and rising sea levels will have on the City. It should be noted that flood zones are not shown on the Policies Map as they are subject to change. Reference should be made to the EA's website for the latest flood zone maps.

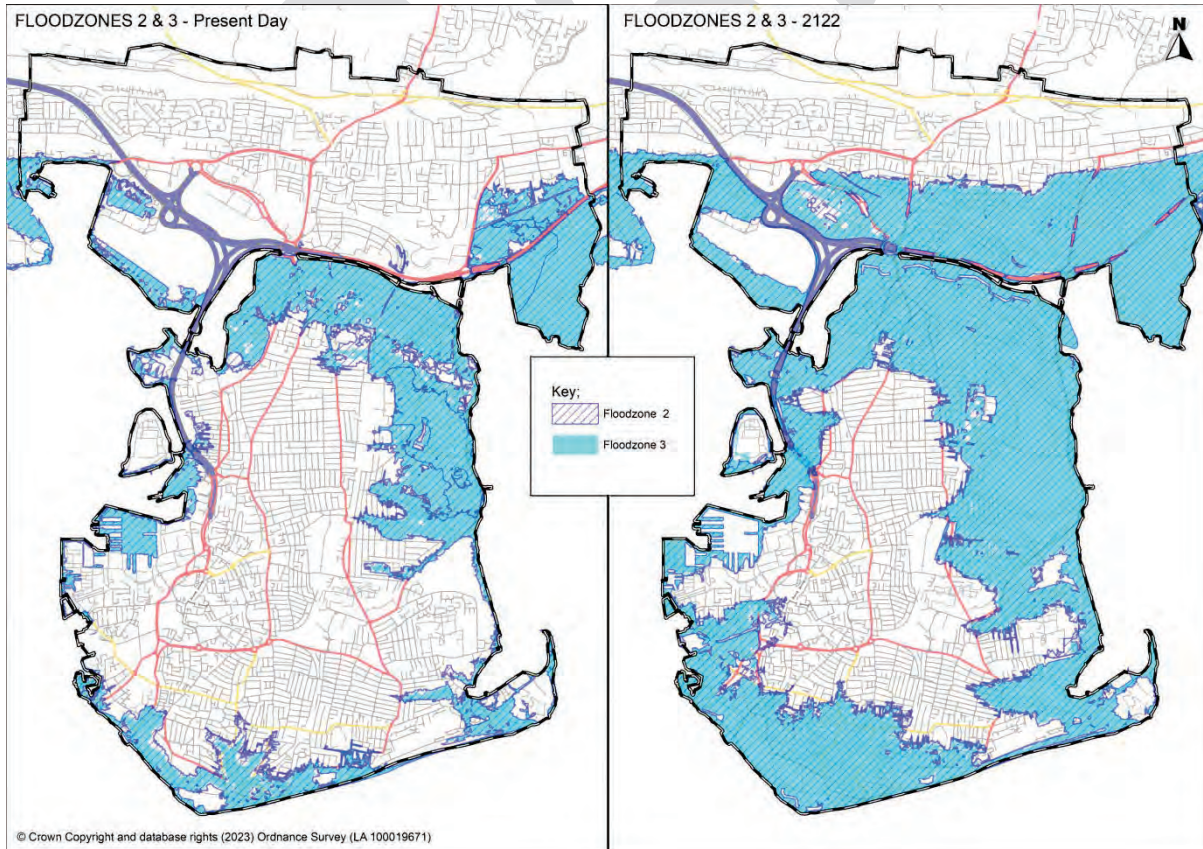


Figure 8.1: Current and Future Flood zones in Portsmouth (undefended)

- 8.6 Managing tidal flood risk in Portsmouth is supported by the Coastal Partners, which is a partnership between Havant, Portsmouth, Gosport and Fareham, and Chichester Councils who manage 176km of Hampshire's coastline and lead on coastal issues. There is a significant ongoing programme of works to ensure coastal defences will be resilient to long term coastal change and sea level rise, in line with the approach of the North Solent Shoreline Management Plan¹³⁸ for Portsmouth, (Hold the Line), and the adopted strategies for Portsmouth's coastline.
- 8.7 There are two significant flood defence schemes currently being developed along Portsmouth's coastline namely the North Portsea Island (NPI) scheme (with an expected completion year of 2026) and the Southsea Coastal Scheme (with an expected completion year of 2029). The NPI scheme covers 8.4km of Portsmouth's coastline and aims to reduce the risk of flooding from the sea to over 4,200 homes, 500 businesses and critical infrastructure over the next one hundred years. The NPI Scheme delivers a 1 in 500 year standard of protection for 100 years. This provides protection to an extreme flood event for a long period of time. When the scheme is fully complete it will protect the eastern road access and also the A3. The Southsea Coastal Scheme aims to reduce the risk of flooding for more than 10,700 properties along the coast from Old Portsmouth to Eastney for the next one hundred years.
- 8.8 In addition to the EA flood mapping, the Partnership for South Hampshire (PfSH) undertook a Level 1 Strategic Flood Risk Assessment (SFRA)¹³⁹ for South Hampshire. This document can be used to understand potential flood risk in the City and help to inform the design of proposals. It assesses and maps all forms of flood risk from tidal, river, groundwater, surface water and sewer sources, taking into account future climate change predictions for the next one hundred years. The Level 1 SFRA was used to assess the risk of flooding to potential strategic sites and allocations from all sources and help inform the sequential test. This demonstrated that land outside of flood risk areas could not accommodate all necessary development to deliver Portsmouth's housing need. Therefore, the scope of the SFRA was increased to a Level 2. Despite this higher level of flood risk assessment being carried out it will still not be possible to meet Portsmouth's housing need in full. The Portsmouth Level 2 SFRA provides more detail about the nature of flood risk for all the sites allocated in this Local Plan. This allows the identification of severity and variation of flood risk within medium and high risk flood areas and allows application of the exception test; in particular part 'b'. Part 'b' requires demonstration that development will be safe for its lifetime, taking into account the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 8.9 The SFRA also identifies Portsmouth's approach to Floodzone 3b. Identification of functional floodplain (Flood zone 3b) should take account of local circumstances and not be defined solely on rigid probability parameters, as set out within national planning guidance. Following an agreed approach with the Environment Agency, there are no areas identified as Flood Zone 3b within Portsmouth. However, where development is proposed within these higher risk areas, flooding must be a key consideration from the outset and throughout.
- 8.10 The approach to flood risk in Portsmouth is set out in more detail in the Development and Tidal Flood Risk Topic Paper¹⁴⁰ which has been developed in partnership by the City

¹³⁸ <https://www.northsolentsmp.co.uk/>

¹³⁹ <https://www.portsmouth.gov.uk/newlocalplanevidencedocs>

¹⁴⁰ <https://www.portsmouth.gov.uk/newlocalplanevidencedocr>

Council and the EA. Further details on partnership working are set out in the Statement of Common Ground between the City Council and the EA¹⁴¹. We will continue to work proactively with the EA to achieve the best possible outcomes for new development and flood risk in the City.

8.11 It is important not to consider flooding as an unforeseeable event with reliance on emergency response, but instead ensure its impacts can be significantly mitigated prior to a flood event happening.

Strategic Policy PLP31: Flooding

1. Development proposals will be permitted where:

- a) They seek to reduce the impact and extent of all types of flooding following the relevant flood risk management steps as set out in Government policy and guidance;
- b) They are accompanied by a site specific Flood Risk Assessment where required by national policy that is informed by the PfSH SFRA Level 1 and Portsmouth SFRA Level 2;
- c) The proposal meets the sequential and exception tests as set out in Government policy and guidance;
- d) The development will be safe over its lifetime, taking into account the increased risk of flooding due to climate change;
- e) Landowners must safeguard land and ensure development does not impact the integrity of or prejudice land used for existing or future flood defences/ flood risk management and/or maintenance of watercourses;
- f) The development will not result in the increase of flood risk elsewhere and where possible will reduce the overall level of flood risk;
- g) Appropriate flood prevention, protection and resilience measures necessary and appropriate to specific requirements of the proposal site and any other areas potentially impacted by the proposed development have been sensitively incorporated. These will be maintained for the lifetime of the development. Flood management and mitigation measures should be informed by the PfSH SFRA Level 1 and Portsmouth SFRA Level 2;
- h) The residual risk of sites currently benefitting; or benefitting in the future from flood defence measures has been taken into consideration;
- i) They are appropriately flood resistant and resilient so that in the event of a flood they can be quickly brought back into use without significant refurbishment;

¹⁴¹ <https://www.portsmouth.gov.uk/newlocalplanevidencedoci>

- j) **Appropriate safety measures have been taken in accordance with the SFRA Level 1 and 2 specifically in relation to finished floor levels, access/escape routes, places of safety and emergency planning; and**
 - k) **Robust evidence must show that all efforts have been made to deliver safe access and egress routes on sites at risk of flooding. Where truly exceptional circumstances dictate this not to be feasible, it must be clearly detailed in a site specific FRA how the risks of flooding can be safely managed. Information on duration, hazard and frequency of flooding must be provided for the development lifetime.**
2. **Site specific Flood Risk Assessments should use the Upper End climate change allowance when assessing flood risk, unless an alternative approach can be justified.**
 3. **Opportunities should be sought to implement natural flood management techniques to attenuate surface water runoff and groundwater discharge.**
 4. **Opportunities for de-culverting watercourse sections should be sought to bolster local channel capacity and conveyance.**
 5. **Proposals that include self-contained basement accommodation for use as a habitable room will not be permitted due to the unacceptable residual flood risks associated with this type of accommodation.**

Supporting text

8.12 The purpose of this policy is to reduce the City's vulnerability to flood risk and the impacts of flooding associated with climate change. The Council will seek to manage flood risk through avoidance of risk wherever possible.

8.13 Government guidance sets out several steps that should be followed when addressing flood risk which have influenced the policy approach. These are outlined in figure 8.2 and should be followed as part of any proposed development in areas at risk of flooding.

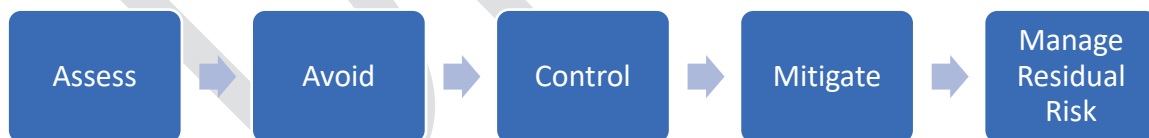


Figure 8.2: Flood Risk Management Steps

8.14 The findings of the SFRA have helped to inform the approach taken within this Local Plan. Flood risk has been assessed and taken into account throughout the development of this Local Plan.

8.15 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving:

- Sites of 1 hectare or more;
- Land which has been identified by the Environment Agency as having critical drainage problems;
- Land identified in a strategic flood risk assessment as being at increased flood risk in future;

- Land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use; or
- Sites of 10 or more units. This does not include sites where units have not altered the building footprint from pre-development.

8.16 National guidance provides further details on how to undertake a site specific flood risk and what it should include.

8.17 Sites that are not allocated in the Local Plan, including sites identified in appendices 2 and 3, that could be at risk of flooding, will need to be supported by their own Sequential Test Assessment. This is because they are not covered by the Council's own Sequential Test Assessment, which has only considered the Strategic Sites and Allocations in this Plan.

8.18 Proposed development within flood zones 2 and 3 will need to be assessed using the sequential and exception tests as set out in national policy. The sequential test aims to steer different types of new development away from areas at the highest risks of flooding. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

8.19 If development cannot be located within zones with a lower risk of flooding, then the exception test may have to be applied. For the exception test to be passed, it should be demonstrated that:

- The sustainability benefits of the proposed development to the community will outweigh the flood risk; and
- The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

8.20 It is appreciated that it may not always be possible to locate development outside areas at risk from flooding in Portsmouth. If this is the case, it is still important for applicants to seek opportunities and measures to reduce the causes and impacts of flooding. Management opportunities to control flood risk should be sought to reduce the overall level of flood risk in the application site and beyond. These should be sensitively incorporated taking into consideration the character, landscape and biodiversity of the area.

8.21 When proposing development within a location at risk of flooding, early engagement should be sought with the City Council as the Lead Local Flood Authority and other flood risk management authorities including the EA, Coastal Partners and Southern Water. This is particularly important for any development proposed within an area identified as having a 3.3% or greater annual probability of flooding. The delivery of flood management measures must be incorporated to evidence how flood risk has been reduced to ensure development safe for its lifetime.

8.22 Several Flood and Coastal Erosion Risk Management schemes are being developed within Portsmouth as set out within the SFRA Level 1 and 2. The land associated with the development of these schemes (including those in coastal strategy studies and shoreline management plans) will be safeguarded to ensure there is no conflict in land uses. Land associated with flood defence schemes identified within the coastal strategy studies and shoreline management plans, which are yet to commence must also be safeguarded.

Where development is proposed in close proximity to an existing flood defence structure, or land safeguarded for any future flood defence or management measures, early engagement with the Environment Agency should be undertaken to ensure an appropriate buffer is maintained. Alongside rivers¹⁴², this buffer strip will be 8 metres. These buffer strips allow for any future management and maintenance of the flood defence structure. An appropriate buffer should be applied to ordinary and other watercourses.

- 8.23 Where proposed development results in a change in building footprint, land raising, or other structures, that impact upon the ability of the fluvial floodplain to store water, floodplain compensation must be provided on a level for level, volume for volume basis on land which does not already flood and is within the site boundary.
- 8.24 Where feasible, opportunities should be sought to implement natural flood management techniques in order to attenuate surface water run-off and groundwater discharge, such as the planting of riparian woodland and the use of SuDS. All development should not increase the risk of flooding elsewhere.
- 8.25 Where flood defences are present, it should be remembered that these cannot remove risk of flooding entirely and there is always a chance that defences could fail, by being overtopped or breached, during an extreme event. Proposals will therefore need to consider residual risks of flooding in areas which might already benefit from defences (or will benefit from defences in the future) and should incorporate a range of measures to appropriately manage and mitigate residual risk.
- 8.26 Flood resilience is an approach to building design which aims to reduce the risk of damage to homes and businesses that may flood and speed recovery and reoccupation following a flood. Flood resilience measures should be incorporated into a development or redevelopment proposed in an area at risk of flooding to combat all types of flooding including surface water, fluvial and groundwater flooding. Flood resilience measures aim to limit entry of floodwater into homes and businesses (resistance measures) or minimise the impact of any floodwater that does get inside (recovery measures).
- 8.27 Flood resistance construction such as dry-proofing seeks to prevent and/or minimise entry of water into a development up to a safe structural limit. Passive resistance measures should be prioritised over active measures. Flood recoverability incorporates certain design measures that will minimise damage. When incorporating these features into a development, reference should be made to the SFRA Level 1 and 2, in particular for finished floor levels.
- 8.28 Proposals should also incorporate safe access and escape routes, places of safety and adequate flood warnings and evacuation/emergency plans if necessary (devised in accordance with guidance from the appropriate emergency services and Environment Agency¹⁴³) which will help to address any remaining residual flood risk for the occupants after avoidance, control and mitigation measures have been utilised. These should be incorporated in accordance with guidance set out in both the SFRA Level 1 and 2.

¹⁴² Portsmouth has two designated main rivers: Great Salterns Drain and Farlington Marshes Gutter

¹⁴³ <https://www.gov.uk/government/publications/personal-flood-plan>

8.29 It is important that new development takes account of flood risk across the lifetime of the development, including making allowances for any future risk as a result of climate change. Measures to avoid, control, manage and mitigate flood risk should also not increase flood risk elsewhere. Due to the low lying island geography of Portsmouth and the risk of flooding; site specific FRA's should adopt the upper end climate change allowance in order to measure the worst case scenario.

8.30 Due to the unacceptable residual flood risks associated with self-contained basement accommodation, proposals relating to this type of development in particular will not be permitted in the City. Where development is proposed that involves significant works below ground and/or changes to drainage, further assessment (for example through a Hydrogeological Risk Assessment) may be required to determine the potential impact on groundwater and identify proposed mitigation measures.

8.31 The City Council, as appropriate, will secure ongoing maintenance and operation of approved flood mitigation and management systems through planning obligations or suitable conditions.

Sustainable Drainage Systems

Introduction

8.32 Sustainable drainage systems (SuDS) provide opportunities to reduce the cause and impacts of flooding whilst also providing multifunctional benefits including reduction in pollution levels, net gains in biodiversity and landscape improvements.

8.33 Poorly designed drainage in new development can result in increased flood risk both on and off site. Substantial areas of impermeable surfacing material, for instance, leads to increased surface runoff into the drainage system, putting pressure on the local capacity. On-site drainage systems will need to be able to accommodate the development's drainage needs over the lifetime of the development, taking account of day-to-day expected flow rates as well as risks from extreme weather events and future climate change.

8.34 Following a review published by DEFRA in 2023, it is expected that mandatory SuDS in new developments will be implemented via Schedule 3 of the Flood and Water Management Act 2010 in 2024. The implementation of this schedule will also introduce SuDS Approval Bodies whose duty it will be to adopt new drainage systems on the basis that they meet certain conditions.

Development Management Policy PLP32: Sustainable Drainage Systems

- 1. Development proposals will be permitted where they ensure the surface run-off rates from the proposed development do not exceed the existing surface run-off rates, with betterment preferred.**
- 2. Development proposals in areas at risk of flooding from surface water will be permitted where the net surface run off is actively reduced when compared to pre-development levels.**
- 3. All applications should minimise the amount of hard landscaping and incorporate permeable surfacing to reduce surface water run-off.**

4. All applications should incorporate methods for rainwater harvesting, such as water butts.
5. Development proposals will be permitted where SuDS are incorporated and ensure that:
 - a) They incorporate green infrastructure and maximise multi-functional benefits including net gains in biodiversity;
 - b) They are sensitively located and designed to promote an enhanced landscape/townscape and good quality spaces that improve public amenity;
 - c) Surface water will be separated from foul water flows within the site or it may be discharged into the sea, a watercourse or surface water sewer. If all options have been robustly demonstrated not to be possible, the post development rate of discharge of surface water to the combined system should be no greater than the existing rate. Surface water connections to the foul sewer system will not be accepted;
 - d) Any surface water resulting from development on greenfield sites will not be permitted to enter the combined or foul water system;
 - e) Details for future maintenance over the lifetime of the development shall be included with the proposal as part of a sustainable drainage strategy; and
 - f) A joined up approach is taken across the whole site.
6. Development proposals will be permitted where they provide proportionate evidence to demonstrate that wastewater infrastructure can accommodate or be improved to accommodate the proposals and that appropriate provisions will be made. Where necessary, occupation of development should be phased to align with the delivery of network reinforcement, in liaison with the service provider.

Supporting text

- 8.35 The purpose of this policy is to reduce the City's vulnerability to surface water flooding through appropriate management and ensuring there is no net increase in surface water run-off from new development.
- 8.36 Southern Water have made significant improvements to local infrastructure in recent years, separating surface water from the combined sewer system in parts of the City to reduce pressures on wastewater treatment. There are, however, parts of the sewer system which are now in an aged condition with limited capacity to take on new demands. The Council expects new development to assess rates of surface runoff from new development and ensure that there is no net increase as a result of the proposal. Net surface runoff should be actively reduced compared to pre-development levels.
- 8.37 Some locations within Portsmouth are at greater risk of surface water flooding as outlined within the Appendix A Figure 3 of the Level 1 SFRA (Risk of Flooding from Surface Water). There should be a net reduction in surface water run-off achieved on all development sites identified as at risk from surface water flooding. The Level 2 SFRA provides further site-

specific guidance for strategic and allocated sites. Development should accord with these recommendations.

8.38 It is appropriate to expect SuDS to be incorporated on all new development with the implementation of Schedule 3 of the Flood and Water Management Act 2010 in 2024. Given the highly urban nature of Portsmouth and the flooding risks that are posed, new development must not increase the level of surface water run off compared to existing levels on all sites. Opportunities should be sought to reduce these run off rates to minimise pressure on the foul water networks and also the risk of flooding. The benefit of SuDS can be seen in figure 8.3 below.

8.39 As Portsmouth is one of the most densely populated cities in England, the cumulative effects of surface run off, even from smaller and householder applications can have a significant effect. Therefore, all proposals must minimise the levels of impermeable surfacing, for example on driveways and gardens, unless there are overriding reasons that render their use unsuitable. All applications should also incorporate appropriate rainwater harvesting. Rainwater harvesting can range from simple measures such as garden water butts to larger more complex systems that store water in tanks for reuse for activities such as washing cars.

8.40 SuDS can significantly reduce a development's impacts on surrounding water quality. Above-ground SuDS should contain features that have the ability to contribute to green infrastructure, biodiversity net gain, improvements to amenity and landscape benefits.

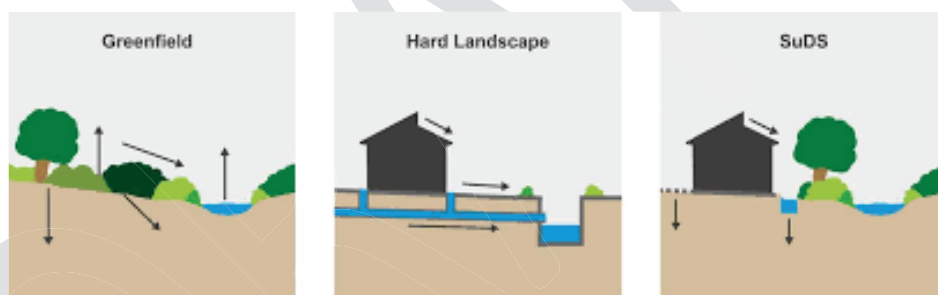


Figure 8.3: Example of how SuDS can reduce run-off rates from development on greenfield sites and return these to pre-development levels (Source: Southern Water)

8.41 Provision must be made for the whole life operation and maintenance of drainage features, so that they remain effective, including taking account of projected climate change. Where SuDS are intended to play a multi-functional role, such as delivering biodiversity benefits, this should not reduce their primary function for the lifetime of the development.

8.42 Development proposals should include an indicative drainage strategy to demonstrate how the disposal and management of surface water is to be dealt with. This should include how sustainable drainage will be incorporated into the development. This strategy should be proportionate to the site and the proposed development and include provisions for long term future maintenance of these systems. Early consultation with Southern Water is recommended during the design phase of the proposal regarding capacity for wastewater for the lifetime of the development.

8.43 To support Southern Water's aim of minimising surface water inputs to its foul drainage network, the company will now adopt certain types of SuDS, taking on future maintenance as appropriate. Further details can be found in their guidance document¹⁴⁴. If the developer intends to take this approach, engagement must be made early in the design process.

8.44 Southern Water's guidance document also sets out the hierarchy for management of surface water for new developments, which is reflected in part H3 of the Building Regulations that must be followed; this is illustrated in figure 8.4. Surface run off should be discharged as high up the hierarchy of drainage options as reasonably practicable and robust evidence provided where this cannot be achieved. To promote efficient use of the foul sewerage system, and release capacity for foul water conveyance, surface water should be separated within the site.

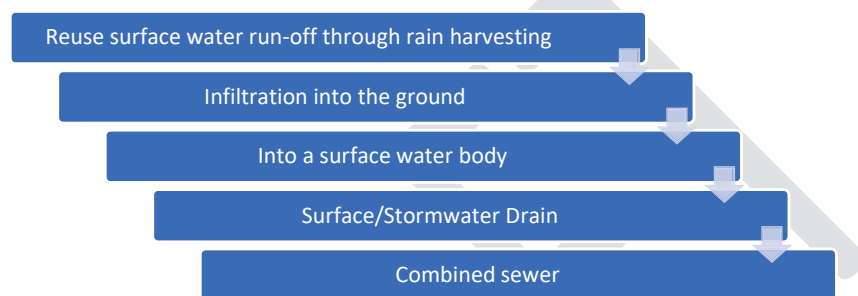


Figure 8.4: Drainage hierarchy for management of surface water

8.45 Given the minimal amount of greenfield land open to development within the City, surface water run off post-development will not be permitted to enter either the combined system or foul water network. All surface run-off will have to be disposed of either through reuse, infiltration, into a nearby watercourse or surface water drain.

Sustainable Construction and Onsite Renewable Energy

Introduction

8.46 The Climate Change Committee report 'The Sixth Carbon Budget: Buildings¹⁴⁵' states that the built environment is estimated to account for 23% of greenhouse gas emissions, both direct and indirect, in the UK. Reducing greenhouse gas emissions from the built environment is therefore essential to contribute to the ambition of carbon neutrality by 2030, as set out in the Climate Emergency Declaration.

8.47 The Climate Change Committee (CCC) sixth carbon budget report suggests that in order to deliver net zero by 2050 as required by the Climate Change Act (2008), all new development should target net zero as soon as possible to avoid additional emissions and catalyse the wider decarbonisation.

8.48 Portsmouth is particularly vulnerable to the risks associated with higher temperatures and overheating during the summer months. As a highly urbanised area, Portsmouth is susceptible to the Urban Heat Island effect whereby air temperatures within the City are warmer than rural areas as the sun's radiation is absorbed by dark, artificial surfaces and then re-radiated into the environment. Climate change is expected to bring increased incidences of heat waves and hot weather events, particularly during the summer months, which is likely to further compound the Urban Heat Island effects on the City.

¹⁴⁴ <https://www.southernwater.co.uk/media/4532/suds-outline-guidance.pdf>

¹⁴⁵ <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

Overheating can be a common issue in homes, public buildings and transport infrastructure due to poor design and the prevalence of older buildings and facilities. The rising average temperatures and increased occurrences of summer heatwaves present a heightened risk for the most vulnerable populations in the City, such as the elderly and those living with life-limiting health conditions. Areas of higher economic deprivation may also be disproportionately impacted by hotter temperatures as they are less able to afford adaptive measures to cope with high heat.

- 8.49 It is important that new development and changes of use incorporate appropriate adaptations in order to be resilient to the future impacts of climate change with consideration of future climate projections for the lifetime of the development. New development is also expected to minimise emissions of carbon dioxide and other greenhouse gases both as part of the construction process, as well as in the operation of the building itself once complete.
- 8.50 Sustainable design and construction practices should therefore strive to make the most efficient use of natural resources and identify opportunities to reuse or recycle materials within the construction process, including the reuse of old buildings where appropriate. Waste products should be reduced, re-used or recycled as much as possible. These practices will also help to reduce embodied carbon within the construction process.
- 8.51 Greenhouse gas emissions are produced at all phases of the development process. As well as the emissions associated with the use of a building, there is carbon embodied into the extraction, manufacture and transportation of building materials, construction, maintenance, repair, replacement, demolition, and eventual material disposal.
- 8.52 Masterplanning of new development should make best use of a site's characteristics and topography to optimise the sustainability of a development as a whole, taking account of wider infrastructure and other issues. For instance this may include incorporating suitable areas for renewable energy generating technologies, electric vehicle charging, secure bike storage or wildlife friendly features within the design and layout of a scheme, as well as taking account of wider green or ecological networks.
- 8.53 The Portsmouth City Council Climate Change Strategy 2022 (CCS)¹⁴⁶ sets out how development can provide Mitigation Support and encourage carbon emission reductions through:
- Promoting measures to increase re-use or recycling of building materials and reduce waste.
 - Promoting initiatives to reduce consumption of materials and products.
 - Promoting local production of materials and products to reduce transport distances.
 - Promoting increased domestic and commercial energy efficiency and usage reduction.
 - Promoting lower carbon fuel and onsite renewable energy sources.
 - Enhanced PCC planning requirements for low carbon and carbon neutral development for new developments and existing build enhancements, that also support low carbon travel and transport.

¹⁴⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/12/Climate-Change-Strategy-2022-Accessible.pdf>

- Ensuring we have committed and united net zero carbon leadership with a clear system of accountability.
- Increase energy micro-generation within our estate.

8.54 The City's water supply is provided by Portsmouth Water, with wastewater treatment managed by Southern Water. Water resources should be managed prudently and sustainably for the future, and with consideration of the wider Southeast region, which is identified as an area of serious water stress. Portsmouth Water is looking to improve resilience through the Havant Thicket Reservoir¹⁴⁷, and Southern Water is looking to improve water quality and resilience through its Water for Life programme¹⁴⁸.



Development Management Policy PLP33: Sustainable Construction and Onsite Renewable Energy

- 1. Development proposals will be permitted where they are designed to reduce their impact on the environment during construction.**
- 2. Development proposals for major development must demonstrate using a Sustainability Statement that all resources are used efficiently, as part of the construction and operation of a building, including consideration of embodied emissions.**
- 3. All developments must follow the principles of the energy hierarchy, to ensure that the design of a building prioritises energy reduction through highly energy efficient fabric measures, lighting, ventilation, and orientation. Once energy demand is minimised and efficiency design measures are in place, renewable energy technologies will be used to meet residual energy demand.**
- 4. The retention of existing buildings will be given preference to the demolition and replacement of existing buildings. Retrofitting energy efficiency measures in existing buildings will be supported. Significant weight will be given to the benefits of development resulting in considerable improvements to energy efficiency and reduction in carbon emissions in existing buildings both domestic and non-domestic including through installation of heat pumps and solar panels.**
- 5. Proposals should address rising temperatures and overheating. This should include details of how risks from overheating and heat stress for inhabitants would be addressed for the lifetime of the development.**
- 6. Development proposals that are powered by solid fossil fuels will not be permitted.**
- 7. Residential development should be designed to meet the 110 litres per person per day water efficiency standard.**

¹⁴⁷ <https://www.portsmouthwater.co.uk/new-reservoir/> <https://www.portsmouthwater.co.uk/new-reservoir/>

¹⁴⁸ <https://www.southernwater.co.uk/water-for-life/protecting-the-environment>
<https://www.southernwater.co.uk/water-for-life/protecting-the-environment>

8. Development proposals should incorporate Swift Boxes.

Supporting text

8.55 The purpose of Policy PLP33 is to deliver energy efficiency and onsite renewable energy provision for development in the City to help meet the City's stated goal of becoming carbon neutral by 2030.

8.56 In December 2023 the Government issued a Written Ministerial Statement¹⁴⁹ preventing the adoption of local energy efficiency standards for buildings that go beyond current or planned buildings regulation. This has prevented the City Council from including ambitious targets for energy efficiency in this Local Plan in line with its Climate Change Strategy. The Council is disappointed by this decision and encourages the Government to bring in the necessary changes to the energy efficiency building regulations at the earliest possible opportunity.

8.57 Development proposals for major development must be supported by a Sustainability Statement, either as a standalone document or as part of a Design and Access Statement, which clearly demonstrates how it will address climate change mitigation and adaptation, encourage the decarbonisation of energy and transport, and support the delivery of a carbon neutral City by 2030. The preparation of the Sustainability Statement should be proportionate to the scale of the development and to the impact it will make on climate change. It will need to be submitted with the applicant as part of the validation process. Many organisations provide calculators for working out a buildings embodied carbon including the Royal Institute of Chartered Surveyors¹⁵⁰.

8.58 A Sustainability Statement is a report showing how a developer will address the City Council's objectives concerning environment and sustainability, as set out in Core Policy PLP3. It should where appropriate address the following matters:

- Water efficiency calculations
- Drainage strategy
- Community impact
- Flood risk analysis
- Transport impacts
- Thermal comfort
- Material sourcing
- Impact on pollution
- Daylight assessments
- Impact on ecology

8.59 All developments must follow the principles of the energy hierarchy, to ensure that the design of a building prioritises energy reduction through highly energy efficient fabric measures, lighting, ventilation, and orientation. Once energy demand is minimised and efficiency design measures are in place, renewable energy technologies will be used to

¹⁴⁹ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123#:~:text=Statement%20made%20on%2013%20December%202023&text=As%20a%20Government%2C%20we%20continue,the%20homes%20and%20building%20sector>

¹⁵⁰ <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment.html>

meet residual energy demand. Figure 8.5 illustrates how the energy hierarchy is implemented.

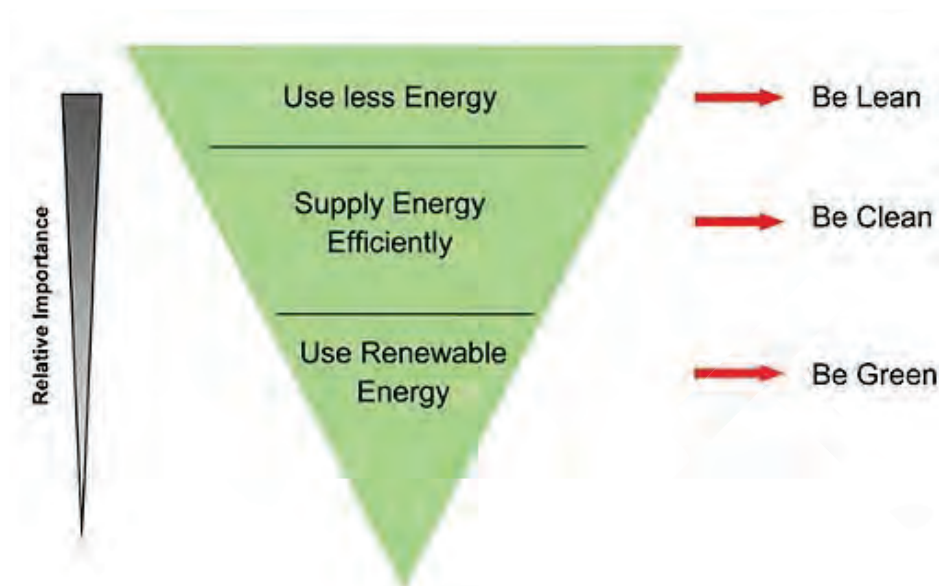


Figure 8.5: The Energy Hierarchy

8.60 Development proposals will be expected to demonstrate how the risks from overheating on inhabitants of the development for present and predicted future climate have been addressed for the lifetime of the development in the Sustainability Statement. The Sustainability Statement should set out how risks from increasing temperatures and heat stress have been considered and addressed within the design, layout and construction of the development. The information in the Sustainability Statement should be proportionate to scale of the proposal and could cover the following:

- How internal heat generation has been minimised through energy efficient design.
- How green/blue infrastructure has been designed to cool the site and buildings.
- How buildings have been designed to reduce overheating, considering orientation, materials used and/or internal layout.
- How cooling has been achieved through passive ventilation, prior to more resource intensive measures like mechanical ventilation and active cooling.
- Other strategies for ensuring thermal comfort during the summer months.

8.61 In order to demonstrate that measures to reduce the risk of the building overheating have been integrated into all developments, the Good Homes Alliance Tool and Guidance – Overheating in New Homes¹⁵¹ should be referred to.

8.62 The DEFRA Clean Air Strategy (2018)¹⁵² states that approximately 38% of UK primary particulate matter emissions come from burning wood and coal in domestic open fires and solid fuel stoves. This compares with industrial combustion (16%) and road transport (12%). The tiny particles in smoke can enter the bloodstream and enter internal organs, risking long term health issues as well as having more immediate impacts on some people, such as exacerbating breathing problems or triggering asthma attacks. Burning domestic solid fuels leads to emissions of PM2.5 (fine particulate matter). New

¹⁵¹ <https://goodhomes.org.uk/overheating-in-new-homes>

¹⁵² <https://consult.defra.gov.uk/airquality/domestic-solid-fuel-regulations/>

development should not include any boilers or other heating devices using solid fossil fuels, including but not limited to:

- Traditional house coal (or bituminous coal).
- Smokeless coal (or anthracite).
- Manufactured solid fuels.
- Wood.

8.63 Residential development should be designed to meet the 110 litres per person per day water efficiency standard. Methods of minimising water use, including the reuse of rainwater and grey water, should therefore be considered within the design of proposals. These proposals are in line with the Government's¹⁵³ ambitions to meet safeguard water supply and achieve net zero by 2050.

8.64 Water efficiency in residential dwellings makes a positive contribution to tackling the issues off nitrates pollution in the Solent. Council owned housing stock is currently being retrofitted to provide higher levels of water efficiency as one of the measures to meet nutrient neutrality in the Solent. This water efficiency standard has been tested through the City Council's 2021 Habitat's Regulation Assessment and the proposed approach in the Policy is found to contribute to the protection of its ecological integrity.

8.65 New development should look to incorporate Swift Boxes in order to providing space for Swifts to breed. Details on the types of swift boxes that can be installed in new buildings and advice on what would work best of specific development proposals is provided by Hampshire Swifts¹⁵⁴.

8.66 New Development should look to incorporate heat pumps and solar panels where suitable. Consideration will need to be given to the heritage impact of the installation of these technologies especially in regard to Listed Buildings and Conservation Areas.

Renewable Energy

Introduction

8.67 Accelerating the decarbonisation and decentralisation of the energy system in the UK is essential to mitigating climate change. It can also bring wider environmental and economic benefits and improve the security of our energy supply. Portsmouth has the opportunity to increase renewable energy generation and facilitate development to enable a more flexible, smart, decentralised energy system. Fossil fuel-based energy installations will no longer be acceptable. The City Council carried out a feasibility study¹⁵⁵ for large scale wind turbines in 2010, this showed that there was some potential for wind power on Portsdown Hill subject to further investigation.

8.68 It is recognised that increasing the use of renewable and other low carbon technologies is a key part of meeting the carbon dioxide emission reduction targets set by the Government in the Climate Change Act 2008. As well as incorporating low and zero energy production into the construction of new development, Local Planning Authorities need to encourage standalone schemes that contribute to national and regional targets

¹⁵³ <https://www.gov.uk/government/news/new-water-saving-measures-to-safeguard-supplies>

¹⁵⁴ https://www.hampshireswifts.co.uk/files/ugd/e556df_dc583b7444504bf8ae91f4ad3b911aa3.pdf

¹⁵⁵ <https://www.portsmouth.gov.uk/newlocalplanevidencedocad>

for renewable energy production. This includes the target set in the UK Renewable Energy Strategy¹⁵⁶ (2009) for 15% of energy to come from renewable sources by 2020. Low carbon technologies are those that significantly reduce emissions when compared to the conventional use of fossil fuels.

8.69 The NPPF requires Local Planning Authorities to support the transition to a low carbon future by helping to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure. Community-led initiatives for renewable and low carbon energy should also be supported. This needs to be carried out in ways which ensure that any adverse impacts are adequately addressed.

Development Management Policy PLP34: Renewable Energy



- 1. Development proposals for wind turbines and solar photovoltaic arrays will be supported in principle at appropriate locations subject to it being demonstrated that there are no adverse impacts (or that they can be made acceptable) on living conditions including those from vibration, noise, shadow flicker, glint, glare and air quality.**
- 2. Development proposals for renewable and low carbon energy generation developments that are led by and/or meet the needs of local communities will be supported. Support will be given to community energy schemes which provide energy for local facilities or development areas.**
- 3. Where community support is identified for a specific technology at a given location, this will be identified as a preferred location for that technology.**
- 4. Proposals for wind and solar PV farms to re-power at the end of their operational life will be permitted, as long as the turbines and/or solar panels are replaced with new equipment of either the same or larger installed capacity, and subject to compliance with statutory, site-specific and other constraints.**
- 5. The development of Combined Heat and Power networks will be encouraged provided that:**
 - a) They use renewable and low carbon forms of energy generation; and**
 - b) Individual developments make all reasonable efforts to meet net zero through onsite measures, before connecting to a heat network.**

8.70 The purpose of Policy PLP34 is to encourage increased levels of renewable energy generation across the City. This has the potential to contribute to the City's Climate Emergency Declaration and the aim of carbon neutrality by 2030.

8.71 Standalone renewable energy generation is defined as those installations which are freestanding or standalone, are not building-mounted or wired through a building to support the onsite energy balance.

¹⁵⁶ <https://www.gov.uk/government/publications/the-uk-renewable-energy-strategy>

- 8.72 Proposals for wind turbines will need to take account of specific constraints related to the presence of protected Brent Geese. Proposals will also need to consider the potential impact upon protected Ministry of Defence facilities around the city.
- 8.73 The City has areas which are covered by a variety of designations for ecology, historic and landscape reasons. Solar photovoltaic array and wind turbine proposals will therefore need to ensure that there will be no direct or indirect adverse impacts upon these designated sites and assets, or that those impacts can be made acceptable. In addition, the impact of development on the amenity of local residents and businesses must be carefully and adequately assessed. In all cases, proposals will be judged against the other relevant policies within the locale to ensure no adverse impacts.
- 8.74 Community energy refers to the delivery of community-led renewable energy, energy demand reduction and energy supply projects, whether wholly owned and/or controlled by communities or through a partnership with commercial or public sector partners. Community Energy England provides further detail on how community energy projects work¹⁵⁷.
- 8.75 Repowering is the process of replacing older power generation with newer equipment that either has a greater capacity or more efficiency which results in a net increase of power generated. Repowering can happen in several different ways. It can be as small as switching out and replacing a boiler, to as large as replacing the entire system to create a more powerful system entirely. Proposals that look to repower existing renewable energy provision will be supported.
- 8.76 Combined heat and power (CHP)¹⁵⁸ is a highly efficient process that captures and utilises the heat that is a by-product of the electricity generation process. By generating heat and power simultaneously, CHP can reduce carbon emissions by up to 30% compared to the separate means of conventional generation via a boiler and power station.
- 8.77 The heat generated during this process is supplied to an appropriately matched heat demand that would otherwise be met by a conventional boiler. CHP systems are highly efficient, making use of the heat which would otherwise be wasted when generating electrical or mechanical power. This allows heat requirements to be met that would otherwise require additional fuel to be burnt.
- 8.78 Combined Heat and Power Networks in the City should look to contribute to good air quality through the use of renewable and low carbon forms fuels, it is expected that they would not use solid fuels as outlined in policy PLP33. Proposals for the use of CHP or to link to existing CHP networks should first consider the energy hierarchy as set out in policy PLP33.

Air Quality and Pollution

Introduction

- 8.79 The Government published in 2018 a supplement to the UK Plan, setting out conclusions for 33 local authorities based on Targeted Feasibility Studies. The

¹⁵⁷ <https://communityenergyengland.org/pages/what-is-community-energy>

¹⁵⁸ <https://www.gov.uk/guidance/combined-heat-and-power>

supplement identified eight local authorities, including Portsmouth, with more persistent long-term exceedances. The Government issued a Ministerial Direction to this group of local authorities. This Direction requires these local authorities to develop a local plan to identify the option which will deliver compliance with legal limits for nitrogen dioxide in the shortest possible time. In response, the Council prepared a Local Air Quality Plan, working closely with Government's Joint Air Quality Unit, to achieve compliance with legal limits for nitrogen oxide (NO₂) in the shortest possible time. This Policy seeks to help implement the Local Air Quality Plan. The City Council's Emissions Based Assessment¹⁵⁹ concluded that despite the traffic modelling predicting an overall increase in traffic flow with the development allocations in Local Plan in place 2041, the total emissions across the Portsmouth administrative area were predicted to reduce.

Development Management Policy PLP35: Air Quality and Pollution

1. Planning permission will only be granted for development proposals when it can be demonstrated, in a proportionate manner, that they will not contribute to and will not be subject to unacceptable levels of pollution, which cannot be mitigated. This includes all of the following:

- a) Air quality /odour / dust;
- b) Noise;
- c) Vibration;
- d) Light;
- e) Water including leachates;
- f) Any other forms of pollution.

2. Planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers.

3. Major development proposals will be required to undertake an accompanying Health Impact Assessment, demonstrating how the planning application has been informed by the findings of the assessment in regard to air quality.

4. Planning permission will be granted where it addresses any potential impacts of airborne pollution on the natural environment.

Supporting text

8.80 The purpose of Policy PLP35 is to improve air quality in the City and thus also improve the health of the City's residents.

8.81 Well-designed development can help to support health and wellbeing and create opportunities for improved health outcomes. For instance, the incorporation of quality

¹⁵⁹ <https://www.portsmouth.gov.uk/newlocalplanevidencedocx>

amenity, communal spaces provide opportunities for connecting with others and enabling social support and tackling issues of isolation and loneliness that have negative impacts on mental health. Integrating active and sustainable travel options would encourage walking and cycling over vehicle use, contributing to air quality improvements from fewer vehicle emissions.

8.82 It is crucial that the design of new development takes into account health and wellbeing at an early stage including consideration of air quality issues. Proposals should demonstrate how negative impacts on health have been minimised and how opportunities for protecting and improving people's health and wellbeing have been fully considered.

8.83 As well as the impact of the proposal on its location, the health and amenity of the prospective occupants/users of a proposal must also be considered in relation to the potential exposure to both existing and potential future conditions.

8.84 The Council expects all proposals to integrate health and wellbeing considerations at all stages of the development process. Major development must be accompanied by a Health Impact Assessment, proportionate to the size and scale of the development. This must be informed by the most up to date evidence for health and wellbeing in the City and demonstrate how all aspects of the development of the proposal have considered health inequalities, the wider determinants of health and how it has been informed by, and responds to, key health and wellbeing issues.

8.85 The Health Impact Assessment will produce a set of evidence-based practical recommendations that will inform decision-makers on how best they can promote and protect the health and wellbeing of local communities. It should demonstrate how the development maximises its positive impacts and minimises its negative impacts on health of residents and address health inequalities. Government Guidance on Health Impact Assessment provides further detail and links to supporting information¹⁶⁰.

8.86 Proposals will need to take account of where development is likely to have an adverse effect on air quality, especially in areas where it is already known to be poor and could affect the living conditions or health of occupiers, and where it could be impacted by Portsmouth's Local Air Quality Local Plan¹⁶¹, Air Quality Management Areas¹⁶² and the Clean Air Zone(s)¹⁶³, as well as the potential for cumulative impacts. Opportunities to improve air quality or mitigate impacts should be maximised by traffic and travel management or green infrastructure provision and enhancement. The City Council has produced an evidence study looking at the impacts of air quality of health which highlights the areas of the city most affected¹⁶⁴.

¹⁶⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf

¹⁶¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/04/air-quality-local-plan-2019.pdf>

¹⁶² <https://www.portsmouth.gov.uk/wp-content/uploads/2020/04/cmu-air-quality-map.pdf>

¹⁶³ <https://cleanerairportsmouth.co.uk/>

¹⁶⁴ <https://www.portsmouth.gov.uk/newlocalplanevidencedocx>

8.87 Air Quality Impact Assessments (AQAs) on major developments should consider air quality impacts at all stages of a proposal, from the initial designs through to construction and occupation with consideration of appropriate mitigation. Ideally Assessments would be closely aligned with any Health Impact Assessment of the proposal. The type of AQA required will depend upon the significance of any air quality issue, the scale over which impacts might be expected and their likely significance. AQAs should also refer to the advice set out in national guidance. It is advised that agreement on the approach to AQA be sought with the council at the earliest opportunity.

8.88 Major Development proposals should look to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on Habitats sites and SSSIs.

Coastal Zone

Introduction

8.89 As an island City, Portsmouth has a significant length of coastline, which brings a range of benefits. On the eastern coastline, the intertidal and connected onshore areas form an integral part of the protected Langstone Harbour environment. This area features some of the City's more extensive areas of open space that help to support roosting and feeding sites for Brent Geese and Waders and the intertidal zone supports a range of species. In contrast, the western seaboard around Portsmouth Harbour is more urbanised and includes Gunwharf Quays, marine employment areas including the International Port and the Naval Base, which are all key to the ongoing economic productivity of the city.

8.90 The Coastal Zone was defined based upon the open nature of the of the landscape bordering the shoreline. The land in the Coastal Zone has a landscape and amenity role that is integrally tied to the coast and which forms its setting. Existing built-up areas and the strategic sites allocated in this Local Plan were largely excluded from the Coastal Zone as they would be acceptable for a wider range of redevelopment opportunities. Redevelopment proposals in the areas close to the coast but not in the Coastal Zone should still take account of the setting of the coastline in their design. Marine and maritime uses are an integral part of the Coastal Zone and were included where they were outside the existing built up urban area. The Coastal Zone largely comprises open landscape scale spaces in close proximity to the coast, and in some cases further inland. Figure 8.6 is a map of the Coastal Zone and the exact boundary is plotted on the Policies Map.

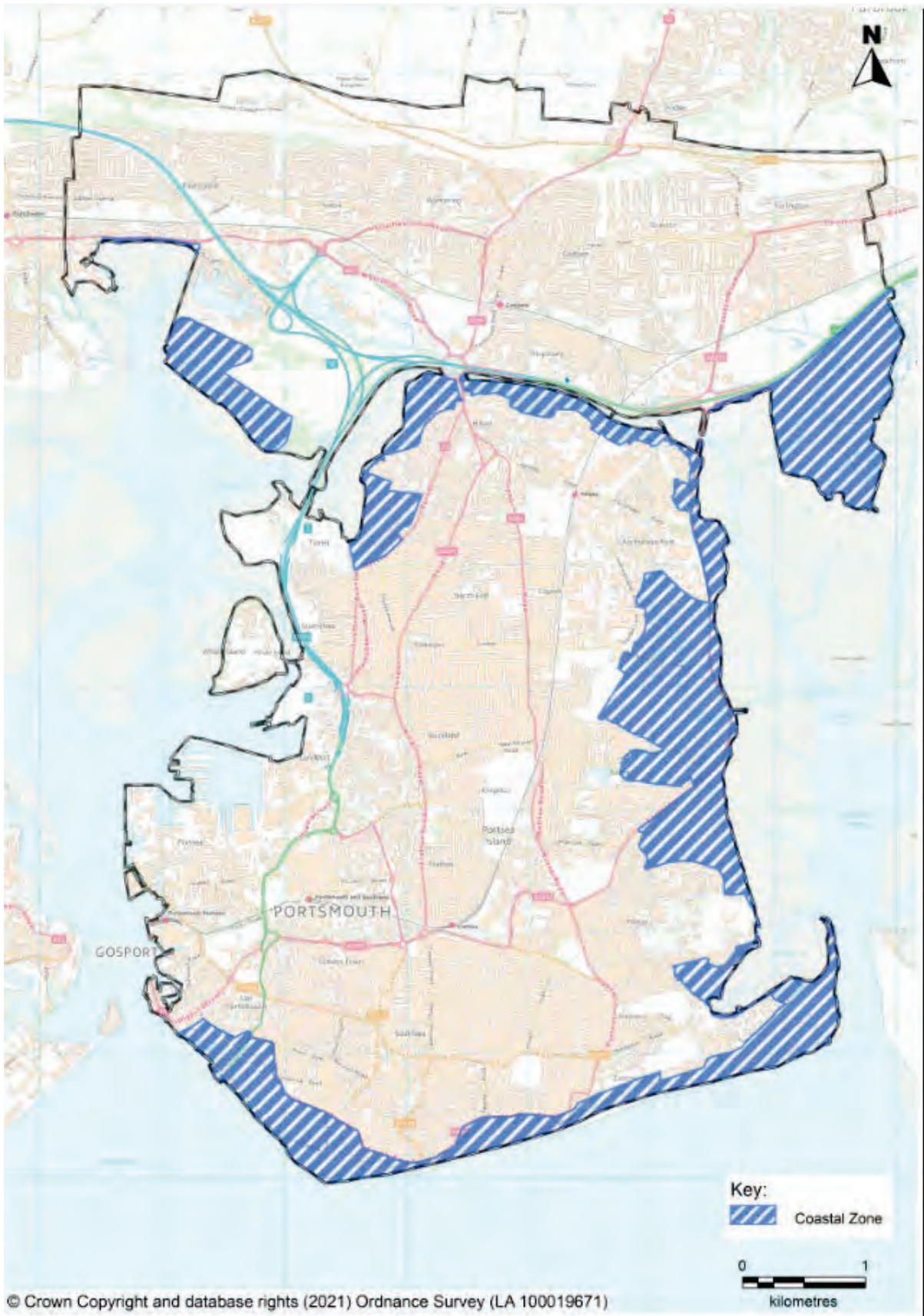


Figure 8.6: Coastal Zone

8.91 The coast accommodates a wide variety of different uses including tourism and recreation, open space and nature reserves, heritage and marine and maritime related industries. However, the coast is increasingly under pressure from population growth, development needs, flooding and sea level rise. The construction and maintenance of coastal flood defences is required in order to protect existing homes, businesses and key infrastructure.



Development Management Policy PLP36: Coastal Zone

1. Development proposals in the Coastal Zone, as defined on the Policies Map, will be permitted where they:

- a) Avoid adverse impacts on the functionality of marine and maritime related uses;**
- b) Seek opportunities to maintain and enhance sustainable access for all to the coast whilst minimising recreational disturbance to bird populations;**
- c) Conserve and enhance the character of the Coastal Zone;**
- d) Protect and where possible enhance key views to and from the Coastal Zone linking the City to its wider landscape setting; and**
- e) Are consistent with the Shoreline Management Plan and South Inshore and South Offshore Marine Plans.**

8.92 The purpose of policy PLP36 is to protect and enhance access to, the character of and views in and out of the Coastal Zone. The Policy also aims to protect marine and maritime related uses.

8.93 The Coastal Zone contains a large number of marine and maritime uses. These include but are not limited to marinas (Southsea and Port Solent), wharfs (Kendall's Wharf) and recreational marine businesses (Southsea and Clarence Piers, Andrew Simpson - Watersport Centre and South Coast Wake Park). These businesses require direct access to the coastline in order to function. Development proposals should avoid adverse impacts on the functionality of these businesses.

8.94 Much of the Coastal Zone is used by Brent Geese and Waders as supporting habitat to their Primary Habitat on Portsmouth and Langstone Harbours. The impact on the presence of Brent Geese and Waders on development is dealt with under policies PLP42 and PLP43 of the Local Plan.

8.95 As a waterfront City one of Portsmouth's greatest assets is the access for its residents and visitors to the coastline. This access provides recreational and health benefits, as well as providing a significant economic opportunity supporting waterside businesses including cafes and restaurants. The waterside in large part now forms part of the recently extended 46 km (28.6 miles) stretch of the England Coast Path¹⁶⁵ from Gosport to Portsmouth, which opened to the public in 2022. Where development takes place

¹⁶⁵ https://www.nationaltrail.co.uk/en_GB/trails/england-coast-path/

adjacent to the coastline proposals should retain and enhance public access where it already exists and provide new access by active means, such as walking and cycling, which is suitable for all users adjacent to the coastline where there is not an existing extant access. Access should look to join to existing adjoining access or provide opportunity for future linkages to adjoining areas which do not have them.

8.96 The character of the Coastal Zone is defined by the wide open spaces on the edge of the city facing onto the Solent, and Portsmouth and Langstone Harbours. These areas are dominated by the presence of the coast. Proposed development on the coastline should be appropriate in nature and character to its location, avoid significant adverse impacts upon the coastal setting and views; and avoid encroachment upon existing marine and maritime uses. For example, lighting associated with any building or structure must take account of navigation in coastal waters.

8.97 Key views to and from the Coastal Zone to the surrounding landscape include but are not limited to:

- Eastern side of Portsea Island across Langstone Harbour to Hayling Island and the South Downs to the north of Chichester;
- Southsea shoreline from the water including views from / to key historic features such as Southsea Castle and Gosport;
- Portsmouth Harbour to and from Gosport, Old Portsmouth and Gunwharf Quays;
- Tipner and Horsea Island to Portchester.

8.98 A Shoreline Management Plan (SMP) is a high-level, non-statutory, policy document setting out a framework for future management of the coastline and coastal defences. It promotes management policies that will achieve long-term objectives, the Solent Area is covered by the North Solent Shoreline Management Plan, which was developed in partnership with the Solent Local Planning Authorities, Natural England and the Environment Agency. Further detail on the North Solent Shoreline Management Plan can be found in the supporting text to policy PLP31.

8.99 The South Marine Plan¹⁶⁶ introduces a strategic approach to planning within the inshore and offshore waters between Folkestone in Kent and the river Dart in Devon. It provides a clear, evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the marine plan area.

Contaminated Land

Introduction

8.100 Portsmouth's coastal location and long history of industrial, landfill and military activities have left a legacy of land contamination throughout the City. Failing to adequately address land contamination can have serious implications for human health, property and the wider environment.

8.101 All local authorities have a duty to inspect their areas for contaminated land, and to deal with any contamination in a satisfactory way in accordance with the Environmental

¹⁶⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/726867/South_Marine_Plan_2018.pdf#:~:text=1.%20The%20South%20Marine%20Plan%20introduces%20a%20strategic,might%20take%20place%20within%20the%20marine%20plan%20area.

Protection Act 1990. The Act defines contaminated land as an area where significant harm is being caused or is likely to take place because of the substances in, on, or under the land, or where the pollution of controlled waters has occurred, or is likely to be caused. All councils throughout the country are legally obliged to produce a strategy for contaminated land and the Contaminated Land Strategy for Portsmouth is published on our website¹⁶⁷.

Development Management Policy PLP37: Contaminated Land



1. Planning permission will only be granted for development on or near contaminated land or where the presence of contamination is reasonably suspected where appropriate and sufficient measures can be taken to remediate and/or satisfactorily mitigate the risk of contamination. Such measures must address the long-term safety of the proposed development, the end users of that development and the natural environment and include the future management of the site.

Supporting Text

- 8.102 The purpose of this policy is to prevent unacceptable risks from contamination in Portsmouth.
- 8.103 To address land contamination in Portsmouth, the applicant should ensure any potential issues are identified and discussed with the Council as early as possible in the development process.
- 8.104 Where contamination is known, or is suspected, and a sensitive land use, such as housing, is proposed planning applications must be supported by sufficient information from a desk study and intrusive investigation to demonstrate that remedial measures are available to make the site safe for the proposed end use.
- 8.105 The Council will support land uses in principle which propose a beneficial use on known or suspected contaminated land, where the site-specific history poses a low risk and/or where effective remediation can be achieved to comply with national policy.
- 8.106 The applicant must consider and address contamination issues positively and proactively to the satisfaction of the Local Planning Authority before gaining planning permission and have an agreed scheme in place before development commences. The investigation of land can be time consuming, and this must be factored into any proposed development, as works cannot progress until this aspect has been agreed in writing with the Council. Commencement without agreed measures in place may void any planning permission granted by the council, rendering any resulting development unlawful.
- 8.107 Development proposals will be expected to seek sustainable solutions to the remediation of contaminated land.

¹⁶⁷ <https://www.portsmouth.gov.uk/services/council-and-democracy/policies-and-strategies/contaminated-land/>

Chapter 9: Greening the City

Introduction

9.1 In December 2021 Portsmouth City Council declared that we are experiencing a nature emergency¹⁶⁸, recognising that:

- Nature is in long term decline and urgent action must be taken to reverse this.
- A thriving natural environment underpins a healthy, prosperous society.
- The nature crisis and the climate emergency are intrinsically linked and that the impacts of the climate crisis drive nature's decline, while restoring nature can help to tackle the climate crisis.

9.2 The Declaration committed to embedding nature's recovery at the heart of all strategic plans, policy areas and decision-making processes including the Local Plan. The Declaration also said the Council should set clear strategic goals for nature recovery by 2030 covering the following areas:

- Committing to protect 30% of land for nature by 2030 in line with national and international commitments to biodiversity.
- Increasing space for wildlife and long-term maintenance and expansion of a Nature Recovery Network.
- Reducing pressure on wildlife.
- Improving doorstep access to nature, particularly for those from disadvantaged backgrounds.
- Supporting communities and businesses to make better decisions and take action to support nature's recovery.

9.3 The Local Plan will sit alongside other City Council strategies and initiatives to set out our approach to meeting the commitments set by the declaration.

Background

9.4 By 2040, the population of Portsmouth is forecast to grow to approximately to 226,000 people. As our City grows and more people move into already crowded spaces, it is important to transform our urban areas into healthy places to live. An increasing body of research tells us that we should be letting nature back in. We have a responsibility as human beings to take care of nature in our cities. In return, the benefits to our health would be huge.

9.5 The most recent State of Nature report¹⁶⁹, published in 2023, suggests there has been a 19% decline in the average abundance of wildlife in the UK since the 1970s. Changes in land use and the distribution of habitat types have caused changes in biodiversity with an overall picture of ongoing species decline.

9.6 The UK's urban areas are where most people make a connection with nature. There is therefore enormous potential for engaging people to act individually in their own gardens or to act together in local green space projects. This is being supported by policy and

¹⁶⁸ <https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=4634&Ver=4>

¹⁶⁹ https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

planning regulations to ensure best practice in new developments and management of existing green spaces, as well as through empowering citizens to take individual and collective responsibility for the nature on their doorstep.

The benefits of green spaces in cities

9.7 Planning cities to include green spaces wherever possible is the first step in making our urban areas healthier. For example, creating green roofs has proven to reduce the urban heat island effect. Having soil, plants and greenery on our roofs would both reduce surface temperature and serve as insulation for the structures below, reducing the energy needed to heat and cool the buildings. Green roofs can also help regulate rainwater, trapping it as it falls and filtering out pollutants.

9.8 Trees in our streets also play their part, and a variety of tree species can have a profound effect on our biodiversity. If we give space to natural processes and link up our green spaces, we can create flourishing and wild ecosystems in man-made environments.

9.9 Nature isn't just a great habitat for wildlife but it is good for children to play in. Simply having access to green spaces in cities can do wonders for our stress levels and concentration at work. Something as simple as a five- to ten-minute break during the workday can improve well-being and boost productivity.

9.10 Green spaces are vital for everyone and everyone should feel the benefit. Parks should be easily accessible, democratic spaces, somewhere you can go, and meet people from all walks of life within your and the wider community.

Greening Strategy and Development Plan

9.11 The Greening Strategy and Development Plan¹⁷⁰, adopted in October 2023 has a series of Green Infrastructure Objectives, which set out the Councils ambitions for greening:

- **Create:** Install new multi-functional green infrastructure, prioritising those areas with the poorest access.
- **Improve:** Improve and develop existing green infrastructure to better suit the needs of the population and wildlife.
- **Protect:** prevent removal of or damage to existing green infrastructure during building works
- **Maintain:** Ensure areas are well maintained and that plans are in place for effective funding, governance and stewardship of green infrastructure to enable long term sustainability.
- **Connect:** Improve connectivity of green infrastructure within Portsmouth reducing habitat fragmentation and improving opportunities for active travel.
- **Access:** Promote and provide healthy, accessible facilities across all social group and areas of the City.
- **Active:** Increase use of green infrastructure by developing activity programmes and green social prescribing.

¹⁷⁰ <https://democracy.portsmouth.gov.uk/documents/s47997/Appendix%201%20-%20Greening%20Strategy%20and%20Delivery%20Plan.pdf>

- **Evaluate:** Ensure systems are in place for the evaluation of new green infrastructure projects so that benefits can be measured and informed decisions can be made in future.

Green Infrastructure

Introduction

9.12 Green Infrastructure plays an important role in, mitigating and adapting to climate change, enabling, and supporting healthy lifestyles through outdoor recreation and access and enhancing biodiversity. In recognition of these multiple benefits, the Council expects major development to provide green infrastructure either on-site (integrated within the development and connected to the wider green infrastructure network where possible) or as part of an offsite contribution which connects to the wider green infrastructure network. It should always be provided onsite in the first instance unless it can be shown to not be possible. Development proposals which could adversely impact upon existing green infrastructure assets will only be granted permission where suitable mitigation is satisfactorily agreed and secured. This is to ensure that the local green infrastructure network is continually safeguarded and does not become fragmented. There are many features and components of the green infrastructure network that are also associated with the Local Ecological Network.

9.13 At a national level, Natural England published its Green Infrastructure Framework¹⁷¹ in 2023. The Framework integrates green infrastructure tools, principles, standards and design guidance. The Framework is supported by a Green Infrastructure Mapping Tool, which is part of Defra's Natural Capital Ecosystems Assessment Programme.

9.14 At a sub-regional level, the Partnership for South Hampshire (PfSH) has developed a Green Infrastructure Strategy¹⁷² and associated Implementation Plan. Together they provide an ambitious long-term framework for green infrastructure and set out the green infrastructure strategic projects that will support and enable growth and development within the sub-region, whilst delivering a range of environmental and community benefits. The Strategy identifies a Green Grid across the sub region. In Portsmouth this comprises Portsmouth Harbour SPA / Ramsar, Langstone Harbour SPA / Ramsar, Southsea Seafront as a recreation area, Portsdown Hill as a visitor facility, National Cycle route 2 and the Solent Way, England Coast Path and Shipwrights Way as long distance footpaths.

9.15 At a local level, the Green Infrastructure Background Paper¹⁷³ Identified a wide variety of open spaces in the City that form the foundation of the green infrastructure network. It is clear that there are deficiencies in the quantities of most typologies of this open space, which will increase as the City's population grows. The Background Paper recommends that the Local Plan should address and reduce these deficiencies in order to bring about better access to high quality open space at a proportionate amount for the population of the City now and into the future. The Background paper makes the following recommendations for Green infrastructure in the City:

¹⁷¹ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

¹⁷² push.gov.uk/wp-content/uploads/2018/08/South-Hampshire-GI-Strategy-2017-2034-FINAL.pdf

¹⁷³ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21_compressed.pdf

- Resist the net loss of green infrastructure on development sites in the City.
- Identify a strategic green grid across the city, including existing linear areas of green infrastructure.
- Protect open space through a separate policy.
- All new development is encouraged not just to avoid net loss but strive for net gains in green infrastructure.

9.16 The Background Paper identifies a proposed Green Grid made up of proposed and existing Green Corridors and areas of potential focus for the Urban Greening Factor. The Urban Greening Factor will be City wide standard in line with emerging Natural England Guidance. The Urban Greening Factor is a planning tool to improve the provision of green infrastructure and increase the level of greening in urban environments. It is applied to major developments and sets a target score for the proportion of green infrastructure within a development site for specific land uses. The City Council has an ambition to create a network of green infrastructure as set out in figure 9.1. The plan identifies a series of existing and proposed Green Corridors linking the City's open spaces and Local Green spaces to create a joined up green Infrastructure network, which promotes biodiversity and health in line with the ambitions of the City's Greening Development Plan. The Green Grid also presents opportunities to take advantage of Biodiversity Net Gain in order to strengthen linkages. The Green Grid will need to link with the proposals coming out of the emerging Local Nature Recovery Strategy work being led by Hampshire County Council.

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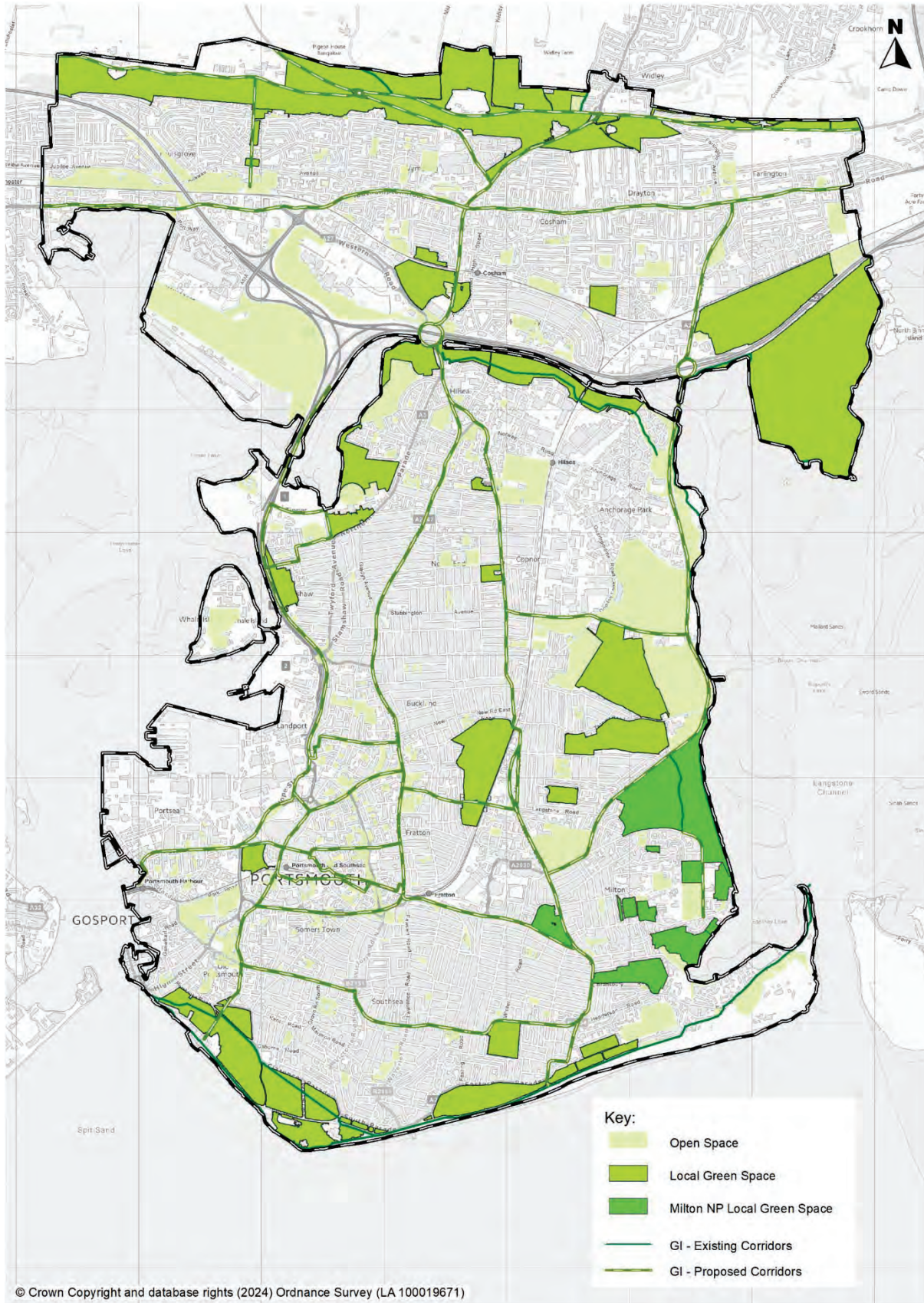


Figure 9.1: The Portsmouth Green Grid including Local Green Spaces and Green Corridors

Strategic Policy PLP38: Green Infrastructure



1. Development proposals will be supported provided that they maintain, protect and enhance the function, integrity, quality, connectivity and multi-functionality of the existing green and blue infrastructure network and individual sites.
2. Development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework including the 15 GI Principles and emerging Portsmouth City Council Greening Strategies.
3. Development should look to conserve and enhance the Green Grid, as shown in Figure 9.1 and on the Policies Map, and should meet the green infrastructure priorities set out in the Portsmouth City Council Green Infrastructure Background Paper.
4. Development proposals that reduce the quality of the green infrastructure network including the proposed Green Grid, as shown in figure 9.1 and on the Policies Map, will only be permitted where suitable mitigation is identified and secured.
5. Development that directly impacts upon or is adjacent to proposed green infrastructure projects named in the PfSH Green Infrastructure Implementation Plan should not prejudice its future delivery and should where possible provide a physical connection to it.
6. Proposals which impact the Green Grid should take opportunities to raise awareness of nature as part of the design of the scheme.
7. Development that does not provide onsite green infrastructure as set out above will only be permitted where sustainable alternative green infrastructure provision of an equivalent standard is provided in close proximity to the development.

Supporting text

- 9.17 The purpose of this policy is to take every opportunity to green the City by making green infrastructure in the City bigger, better and more joined up.
- 9.18 Major Development in Portsmouth should be designed and delivered in line with the five key standards for Green Infrastructure as set out in the Natural England Green Infrastructure Framework. These standards are:
- The Urban Nature Recovery Standard
 - Urban Greening Factor
 - Urban Tree Canopy Cover Standard
 - Accessible Greenspace Standards
 - Green Infrastructure Strategy
- 9.19 The City Council is in the process of developing strategies that set out how it intends to meet the five key standards for Green Infrastructure. When these strategies are published development proposals should take their recommendations into account. The Council intends to review its Green Grid through future detailed assessment.

9.20 Proposals should consider the 15 GI Principles as set out by Natural England. Further detailed Guidance on these principles and how they can be implemented in development have been published by Natural England's 'Process Journey for Developers and Design Teams.

9.21 Greening the City is a City-wide requirement for major development and should be evidenced by the use of an Urban Greening Factor. Until such time as the City Council publishes additional guidance, applicants should use Natural England's Urban Greening Factor as set out in its Green Infrastructure Framework using surface cover types and factors¹⁷⁴. The target minimum score for commercial development is 0.3 and 0.4 for residential developments.

9.22 Development proposals which are located close to or on future identified green infrastructure identified in the Green Grid and projects identified within the PfSH Green Infrastructure Implementation Plan¹⁷⁵ should ensure they do not adversely impact on these future ambitions. This includes preventing their future delivery, blocking/fragmenting or destroying the green infrastructure network. Exceptions will only be made where alternative provision which is the same or better quality is secured. Any proposals on protected habitat which also impact the Green Grid, and which require provision of mitigation will also need to meet the tests set out elsewhere in the Local Plan in addition to the requirements of this policy.

9.23 The Green Grid is intended to create green corridors, which provide benefits for both nature and the health and wellbeing of residents. Opportunities should be taken through the provision of signage and other ways which are accessible to the wider community to raise awareness of these benefits.

9.24 The Council will support development proposals which provide green infrastructure on site and which maximise opportunities for connections to the wider green infrastructure network, as identified through the emerging Local Nature Recovery Strategy. The Building with Nature Standards¹⁷⁶ provide further guidance on how greening can be incorporated into schemes.

Biodiversity

Introduction

9.25 The term biodiversity includes all species, communities, habitats and ecosystems. The biodiversity of the City directly provides or underpins many ecosystem services that people depend on for their health and wellbeing. Biodiversity also underpins air quality regulation and positively reduces urban heating.

9.26 The City's location between the Solent, the Harbours and the Chalk Downland combined with the urbanisation of the majority of the City's area has created a diverse mosaic of habitats that supports many rare and important wildlife species. Many of these are recognised through international, national and local nature conservation

¹⁷⁴ [UGF 3.3 User Guide \(naturalengland.org.uk\)](https://www.naturalengland.org.uk)

¹⁷⁵ <https://www.push.gov.uk/wp-content/uploads/2018/08/South-Hampshire-GI-Strategy-2017-2034-FINAL.pdf>

¹⁷⁶ <https://www.buildingwithnature.org.uk/about>

designations. They form essential components of ecological networks, helping species to adapt to the impacts of climate change and other pressures; evidence for this is provided in the Green Infrastructure Background Paper. Designated sites within the City's administrative area are shown on the Policies Map and in figure 9.2.

9.27 Wildlife habitats are subject to a range of pressures, including development and recreation, and are often degraded. A landscape scale approach is needed to conserve, restore and reconnect habitats across South Hampshire. The City Council is working with Hampshire County Council and neighbouring local planning authorities on the production of a Local Nature Recovery Strategy. As well as causing direct loss of wildlife habitats, development can have a wide range of other impacts, for example, housing developments can result in disturbance to wildlife on sensitive sites by dogs and cats as well as increased recreational pressure from the local population; evidence for this is set out in the Solent Waders and Brent Goose Strategy¹⁷⁷ and is dealt with in detail in Policy PLP42.

9.28 Development can have a positive impact on biodiversity and geological features, for example, by restoring an interconnected network of wildlife sites and achieving net gains in biodiversity. Urban habitats such as gardens, parks and buildings can act as stepping stones and wildlife corridors to enable wildlife to move from one place to another.

¹⁷⁷ <https://solentwbgs.wordpress.com/>

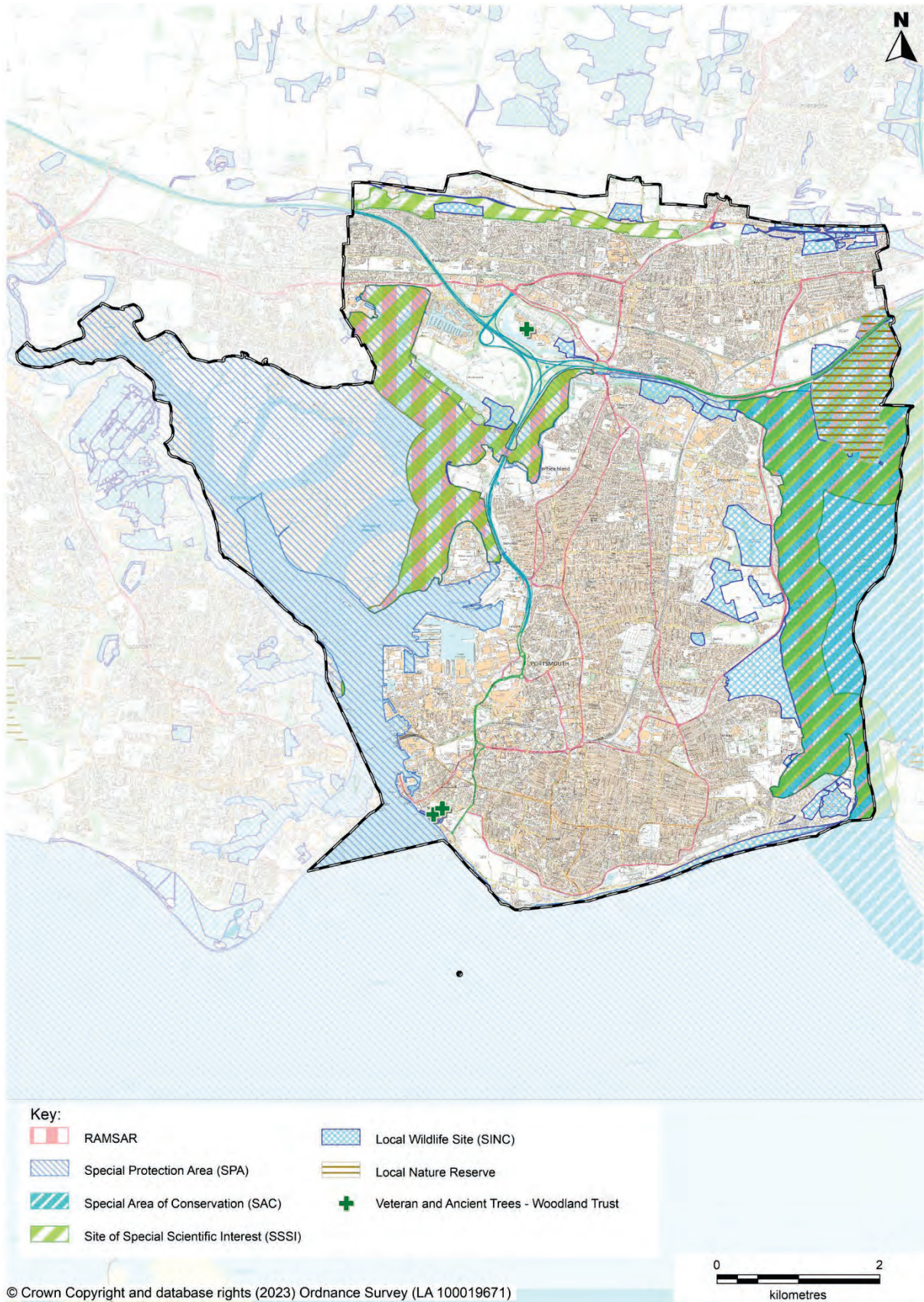


Figure 9.2: Designated nature conservation sites in Portsmouth

9.29 International sites support populations of species that are of particular importance, most notably in the Solent. This comprises the Solent and Southampton Water SPA, Chichester and Langstone Harbours SPA / Ramsar and Portsmouth Harbour SPA / Ramsar sites. Under the Habitats Regulations, the Council as the competent authority is required to demonstrate that proposals for new development avoid or adequately mitigate against impacts on these sites. A Habitat Regulations Assessment has been prepared on an iterative basis for every stage of this Local Plan¹⁷⁸.

9.30 Further detail on the protected wildlife sites found in Portsmouth are set out in the Biodiversity and Portsmouth background paper (2021)¹⁷⁹.

Strategic Policy PLP39: Biodiversity



1. Development proposals will be permitted where they conserve and enhance biodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Up-to-date ecological information should be submitted which demonstrates that development proposals:

- a) Retain, protect and enhance features of biodiversity interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;
- b) Contribute to the creation of larger improved wildlife habitats through the creation of linkages between sites to create and enhance local and regional ecological networks;
- c) Protect and support recovery of rare, notable and priority species;
- d) Seek to eradicate or control any invasive non-native species present on site;
- e) Contribute to the protection, management and enhancement of biodiversity for example by supporting the delivery of green infrastructure and Biodiversity Action Plan targets and enhance Biodiversity Opportunity Areas; and
- f) Comply with the mitigation hierarchy as set out in national policy.

2. The following hierarchy of site designation will apply in the consideration of development proposals:

- a) Internationally Protected Sites as shown on the Policies Map and figure 9.2: Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites, or candidate and formally proposed versions of these designations:

¹⁷⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Biodiversity-Background-Paper-Updated-2021_compressed.pdf

- i. **Development proposals with the potential to impact alone or in combination on one or more international sites(s) will be subject to a HRA to determine the potential for likely significant effects. Where likely significant effects may occur, development proposals will be subject to Appropriate Assessment; and**
 - ii. **Development proposals that will result in any adverse effect on the integrity of any international site will be refused unless it can be demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured.**
- b) Nationally Protected Sites as shown on the Policies Map and figure 9.2: Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR):**
- i. **Development proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an Environmental Impact Assessment; and**
 - ii. **Development proposals should avoid impacts on these nationally protected sites. Development proposals where any adverse effect on the site's notified special interest features is likely and which cannot be either avoided or adequately mitigated will be refused, unless the benefits including socio economic benefits of the development, at this site clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites.**
- c) Irreplaceable Habitats (veteran and ancient trees) as shown on the Policies Map and figure 9.2: Development proposals which result in the loss or deterioration of irreplaceable habitats, including ancient and veteran trees will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.**
- d) Locally protected sites as shown on as shown on the Policies Map and figure 9.2: Local Wildlife Sites (LWS), including Sites of Importance for Nature Conservation (SINC), Locally Protected Sites (Sites of Nature Conservation Importance (SNCI)) and in addition Local Nature Reserves (LNR):**
- i. **Development proposals considered likely to have a significant effect on local sites will be required to assess the impact by means of an Ecological Impact Assessment; and**
 - ii. **Development proposals that will result in any adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will be refused, unless exceptional circumstances outweighing the adverse effects are clearly demonstrated.**
- e) Outside of designated sites:**
- i. **Development proposals should identify and incorporate opportunities to conserve, enhance, restore and recreate priority habitats and ecological**

networks. Development proposals should take opportunities to contribute and deliver on the aims and objectives of the relevant biodiversity strategies including the emerging Local Nature Recovery Strategy where possible;

- ii. Where development adjoins protected sites, buffers should be provided in order to protect and enhance their biodiversity roles; and**
- iii. Opportunities should be taken to create linkages for wildlife between protected sites.**

Supporting text

9.31 The purpose of Policy PLP39 is to set out a positive strategy to ensure the conservation and enhancement of biodiversity across Portsmouth. It also sets out the approach needed for development that impacts the City's hierarchy of designated sites.

9.32 All applications for development must ensure that sufficient and up to date information is provided regarding the wildlife sites or species that may be affected by a proposal prior to determination of the development proposals. For major applications an ecology management plan must be provided, which includes mechanisms for management in the long term.

9.33 Applicants should work with the City Council in the screening and assessment process and provide the necessary information for the Council to make a determination. To avoid any damage to the integrity of these areas and the species they support, mitigation measures or contributions to such measures from new development may be required.

9.34 Details of the hierarchy of sites, habitats and species that have the potential to be impacted by development in the City are set out below.

International Designations

9.35 Portsmouth is home to several Internationally Protected sites namely the coastal SPAs (Portsmouth Harbour SPA, Chichester and Langstone Harbours SPA, Solent and Dorset Coast SPA). These SPA's typically comprise tidal estuaries and / or harbour environments, with extensive mudflats and saltmarshes as well as other associated habitat such as saline lagoons, shingle beaches and more typical terrestrial habitats such as grasslands and woodlands. They are designated for the range of over-wintering Waders and Brent Geese, as well as being protected as a breeding site for protected species notably Terns. The associated Ramsar site designations include the relevant bird populations as well as the wetland habitats present.

9.36 The Solent and Dorset Coast SPA was designated in January 2020. It protects important foraging areas at sea used by common tern, sandwich tern and little tern. This SPA covers a significant area, extending from the Isle of Purbeck in the west to Bognor Regis in the east and following the coastline on either side to the Isle of Wight and into Southampton Water.

9.37 Portsmouth Harbour SPA was registered in 1998. It provides important wintering grounds for migratory waterfowl including Dark Bellied Brent Geese, Red-breasted merganser, Dunlin and Black-tailed godwit.

9.38 Langstone Harbour forms the western portion of the Chichester and Langstone Harbour SPA. The SPA was registered in 1996. Chichester and Langstone Harbour are protected due to the presence of 18 different protected wildfowl including three types of tern (Sandwich, Common and Little Tern) which breed in the Harbour.

9.39 The Solent Maritime SAC is designated for its estuary habitat, spartina cord-grass and Atlantic salt meadows. It is a complex site encompassing a major estuarine system including 16 SSSIs spread across the Solent.

9.40 In addition to their protection as SPA, Portsmouth Harbour and Langstone Harbour are also protected as Ramsar sites. These are wetlands of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands for containing representative, rare or unique wetland types or for their importance in conserving biological diversity

National Designations

9.41 These sites are designated under UK legislation as being of national importance for biodiversity or geodiversity and are afforded statutory protection due to the nationally significant wildlife features that they contain. Portsmouth has three SSSI's (the Portsmouth and Langstone Harbour SSSI's have significant overlap with the SPA's) The three SSSI sites comprise:

- Portsmouth Harbour SSSI: covers the northern extent of the Harbour. The SSSI also includes a small area of terrestrial habitat extending along the southern side of Horsea Island, where chalk spoil was dumped early in the 20th century, supporting a rich chalk grassland flora.
- Langstone Harbour SSSI: covers the majority of the harbour and encompasses the Farlington Marshes Local Nature Reserve (LNR). The area is of interest as it includes one of the largest areas of mixed saltmarsh on the south coast and its extensive cord-grass *Spartina anglica* marsh.
- Portsdown Hill SSSI: a standalone site of national interest, designated for its species-rich chalk grassland formed by its geographical conditions as an isolated east-west chalk anticline with a long south-facing escarpment.

9.42 These sites are protected from any operations likely to cause damage to the designated features. For any development to be permitted that is likely to damage these sites, the developer must demonstrate to the satisfaction of the City Council and Natural England that:

- There are no alternative solutions; and
- The reasons for the development at that site clearly outweigh the nature conservation value of the site and the national policy to safeguard the national network of such sites.

Irreplaceable Habitats

9.43 Development proposals that could impact upon irreplaceable habitats including veteran trees, should note that the significance of irreplaceable habitats may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation. Further criteria relating to veteran trees is found in Policy PLP41: Trees & Hedgerows. A

map of the Ancient and Veterans trees nationwide including those in Portsmouth is maintained by the Woodland Trust¹⁸⁰.

Local Designations

9.44 Locally designated wildlife sites are valuable as a node or link in the local habitat network. These sites can provide valuable stepping stones as part of a wider green infrastructure network. On-going surveys can reveal new areas that warrant such protection. As of October 2023 there are 28 identified SINC(s) in Portsmouth and two distinct Road Verges of Ecological Importance (RVEI). Portsmouth's Local Nature Reserve(s) are also designated as SINC(s). A list of the sites and their features of value is set out in the Biodiversity Background Paper¹⁸¹.

Outside of Designated sites

9.45 In addition to the range of nature conservation designations outlined above, there are other areas in the City which are not subject to statutory nature conservation designation or legal protection, but which form an important element of the collective nature conservation resource. These include priority habitats and non-statutory designations such as Biodiversity Opportunity Areas. There are three Biodiversity Opportunity Areas covering Portsmouth namely Portsdown Hill, part of South Hampshire lowland and Heath (BOA11), Chichester/ Langstone Harbours & Hayling Island (BOA 18) and Portsmouth Harbour (BOA 19).

9.46 The Habitats Directive highlights the need for effective management of linear or continuous features essential for species migration, dispersal and genetic exchange. Such features, like rivers, mature trees and hedgerows, extend across designated and non-designated areas. These features, in particular, will provide the building blocks for achieving the Government's objective to restore and connect wildlife habitats and contribute towards a net gain for biodiversity. They are also important in providing corridors or stepping stones for species and to allow species to adapt to climate change. The maintenance and enhancement of these networks will be encouraged. These undesignated biodiversity assets are important components of the City's green infrastructure.

9.47 Protection of UK Biodiversity Action Plan priority habitats is set out in the Biodiversity 2020 Strategy and under Section 41 of the Natural Environment & Rural Communities Act. The most common priority habitats in the City include lowland calcareous grassland, Coastal Flood Plane and Grazing Marsh, Coastal Saltmarsh and Intertidal Mudflats. The full details of the priority habitats are set out in the Biodiversity Background paper which supports the Local Plan. Further habitat creation opportunities are highlighted in the Partnership for South Hampshire (PfSH) Strategic Green and Blue Infrastructure Opportunities Study¹⁸².

¹⁸⁰ <https://ati.woodlandtrust.org.uk/tree-search/?v=2345647&ml=map&z=14&nwLat=50.84883559247683&nwLng=-1.1395425979836915&seLat=50.82829275855643&seLng=-1.035773295>

¹⁸¹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Biodiversity-Background-Paper-Updated-2021_compressed.pdf

¹⁸² <https://www.push.gov.uk/wp-content/uploads/2023/10/Strategic-Green-and-Blue-Infrastructure-Opportunities-in-South-Hampshire-Part-2-Sept-2023.pdf>

9.48 Hampshire County Council undertakes much of the habitat work of the behalf of the City Council. The full up to date records of habitats, species and designated sites for the City is held by the Hampshire Biodiversity Information Centre.¹⁸³

9.49 Many of the City's protected habitats are in close proximity to the existing built-up area. Schemes which border these protected sites should wherever possible take opportunities to provide buffering taking account of the specific needs of the species and habitats on the protected sites. The City's protected habitats are often fragmented. Development schemes should, if possible, take opportunities to create linkages between protected sites in order to improve the overall value of the habitats for wildlife.

Biodiversity Net Gain

Introduction

9.50 Biodiversity net gain (BNG) is a way to contribute to the recovery of nature while developing land. It is making sure the habitat for wildlife is in a measurably better state than it was before development. Figure 9.3 illustrates the process.

9.51 The Environment Act 2021 made BNG mandatory on large sites from February 2024 and on small sites from April 2024. The City Council is looking to secure 10% BNG in development across the City as a whole. The City Council is keen to secure BNG within the City onsite as a priority and if not then in close proximity in order to provide a direct benefit for the City's residents.

¹⁸³

<https://www.hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre/information>

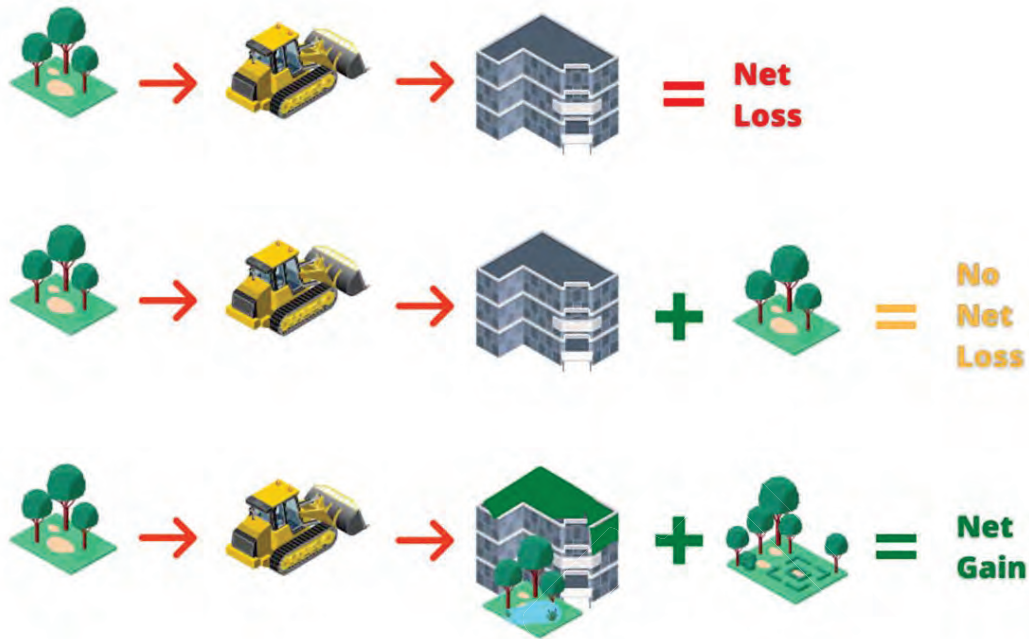


Figure 9.3: Principle of Biodiversity Net Gain

9.52 The Partnership for South Hampshire Strategic Environmental Planning Officer (PfSH SEPO) has commissioned a piece of pilot work on the behalf of the PfSH authorities to consider how to meet the BNG needs of PfSH members and aid in managing BNG on development proposals. Many of these will require offsite BNG delivery to meet the mandatory minimum 10% net gain required by the Environment Act. PfSH members own a considerable number of open spaces and green spaces, which could provide offsite BNG for developments. The initial results of the PfSH trial has shown that approximately 50% of the Cities sites assessed in the trial have some potential for BNG delivery, with a further 20% having significant potential for BNG delivery. In addition the City Council is undertaking work to ascertain the potential for further BNG on land it owns both within Portsmouth and the adjoining Districts and Boroughs.

9.53 BNG will be a key tool in the promotion of biodiversity in the City. It will contribute towards wider goals for wildlife in the City, linking closely with the emerging Local Nature Recovery Strategy work being led by Hampshire County Council. The City Council is looking into the provision of offsite BNG sites in the City. These sites would also contribute to the wider goals around provision of nature conservation and recreation opportunity in the City and surrounding area.



Development Management Policy PLP40: Biodiversity Net Gain

1. Development proposals (except exempt development) will be permitted where they:

- a) **Demonstrate at least a 10% net gain for biodiversity, accounted for in a biodiversity net gain plan.**
- b) **Development proposals should prioritise on site Biodiversity Net Gain and only use offsite banks and credits where this is not achievable.**

- c) **Development proposals within the strategic sites of Portsmouth City Centre and Lakeside and the allocation site of Somers Orchard will be permitted where they demonstrate a 20% net gain for biodiversity accounted for in a biodiversity net gain plan.**

Supporting text

9.54 The purpose of the policy is to ensure that development proposals deliver measurable improvements in biodiversity. The delivery of a minimum of 10% BNG became a national target¹⁸⁴ from February 2024. The City Council is looking to improve on this position by introducing a 20% target on a number allocated three strategic sites / allocations owned by the City Council including Lakeside (PLP5), Somers Orchard (PLP15) and City Centre North (part of PLP6). These targets represent a minimum and many schemes will deliver considerably more uplift than this.

9.55 Proposals should prioritise the provision of onsite Biodiversity Net Gain followed by nearby offsite provision and lastly if this is not achievable by credit provision. The City Council is keen to provide BNG on site as a priority to provide benefits to local residents. Off-site provision should follow this order: close proximity to site the; then within the City of Portsmouth; then within the eastern portion of the South Hampshire sub region.

Trees

Introduction

9.56 The Green Infrastructure Background Paper explains the multiple benefits of trees in the City. Tree coverage is an effective means of shading and therefore cooling the urban environment during warm, sunny summer days, whilst further contributing to urban cooling through increasing rates of evapotranspiration. During times of heavy rain, a well-established tree canopy can act to intercept and slowdown rainfall easing pressure on sewerage systems and helping to mitigate flash flooding. Further benefits from trees are associated with supporting local biodiversity, removing harmful pollutants from the air and generally improving the aesthetic quality of the streetscape. Trees form a vital part of the urban ecosystem contributing to many of the wider objectives set out in this chapter including the Green grid and the delivery of BNG.

9.57 The Council has previously undertaken an in-depth study of tree coverage across Portsmouth using data sourced from aerial imagery. This research is presented in a separate paper An assessment of Tree Cover in Portsmouth¹⁸⁵. Headline findings from that study reveal that there are approximately 86,500 trees in total within the City's administrative boundaries. The area of the City with tree canopy cover equates to 9.8% of the land, which is a lower proportion of canopy cover than other comparative cities such as Southampton, Plymouth and London. The study also found that the density of trees per hectare varied considerably with wards on the mainland benefitting from highest numbers of trees, whilst those on Portsea Island, particularly to the south, had the least trees. This trend was also reflected in the ratio of trees to heads of the population, with Drayton and Farlington wards to the north having the highest ratio at about one tree per head of the ward population, and central Southsea ward in the south the poorest ratio at one tree to ten heads of the population.

¹⁸⁴ [Understanding biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/understanding-biodiversity-net-gain)

¹⁸⁵ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-an-assessment-of-tree-cover-in-portsmouth.pdf>

9.58 In addition the City Council has a Tree Charter¹⁸⁶ which commits to planting 30,000 new trees. The charter sets out that the City Council will improve the quality, quantity and variety of the City's tree stock by implementing a long-term management plan. This management plan will, wherever practicable, ensure a commitment to the residents and visitors of Portsmouth to enhance the City's trees.

9.59 Many trees in the City are protected by Tree Preservation Orders (TPO). Where a tree is protected by a TPO anyone intending to carry out works to cut down, top, lop or uproot trees must first apply to the Local Planning Authority for its consent. Where an exception applies the Council's consent to carry out works is not needed but notice of those works may need to be given to the Council. Full details of the requirements that need to be met when undertaking work to a TPO tree are set out in full on the Council's web page¹⁸⁷ and in the Planning Practice Guidance¹⁸⁸. There are further exceptions relating to trees growing in a conservation area that are not subject to an Order.

9.60 The Natural England Green Infrastructure Framework includes an Urban Tree Canopy Cover Standard, which promotes an increase in tree canopy cover in urban environments. Trees are vital for capturing carbon and can mitigate flood risk as they absorb excess water during flooding incidents. The standard sets out that major residential and commercial development should be designed to meet locally agreed targets.

Development Management Policy PLP41: Trees & Hedgerows



1. Planning permission for development will be granted where:

- a) **Proposals can demonstrate how they have been informed and influenced by the presence of trees on the site, and with particular regard to any Tree Preservation Order designations;**
- b) **It can be demonstrated satisfactorily that the need for and benefits of the development clearly outweigh any loss or deterioration of woodlands, hedgerows or trees of high amenity value; and**
- c) **Tree canopy cover is increased in line with the Natural England Green Infrastructure Urban Tree Canopy Cover Standard as follows:**
 - i. **Tree canopy cover of at least 15% is provided on new major development;**
 - ii. **Replace lost trees at a ratio of 1:1.**

¹⁸⁶ <https://www.portsmouth.gov.uk/services/leisure/wildlife-and-conservation/portsmouth-tree-charter/>

¹⁸⁷ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-applications/tree-works-and-tree-preservation-orders/>

¹⁸⁸ <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>

2. Development proposals resulting in the loss or deterioration of aged or veteran trees, or impacting on their immediate surroundings, will be refused unless there are wholly exceptional reasons, as defined by national policy, and a suitable compensation strategy has been agreed in writing with the Council.

Supporting text

- 9.61 The purpose of this policy is to protect existing trees and enhance the overall level of tree cover in the City.
- 9.62 New and existing trees should be incorporated into new developments and development that incorporates new trees should ensure new streets should be tree lined.
- 9.63 If removal of any trees or hedgerows is necessary, an appropriate replacement of at least equal value will need to be provided on-site, unless it is demonstrated to be impractical to do so. Where on-site planting is not possible, the provision off-site compensation should be considered where possible to negate losses in canopy cover in the local area.
- 9.64 Natural England has developed an Urban Tree Canopy Cover Standard as one of its five key standards for Green Infrastructure, as set out in the Natural England Green Infrastructure Framework. Tree cover in the City's wards ranges from 5% to 14%, this covers all trees, including those on open spaces. The Council is looking to secure 15% tree canopy cover on major development, in line with guidance produced through the South Coast Tree Standards. This is intended to contribute towards the ambition to double tree cover in the city over the next 25 years. In addition all development should look to provide an increase in the levels of tree cover on site.
- 9.65 Works to aged and veteran trees should be determined in line with Standing advice from Natural England and the Forestry Commission ¹⁸⁹. This advice states that development that will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees should be refused planning permission unless both of the following applies: there are wholly exceptional reasons and a suitable compensation strategy in place.

Solent Waders and Brent Geese Sites

Introduction

- 9.66 The Solent Waders and Brent Goose Strategy (2020) (SWBGS)¹⁹⁰ relates to internationally important brent goose and wading bird populations within and around the SPA and Ramsar wetlands of the Solent Coast. The underlying principle of the Strategy is to wherever possible conserve extant sites, and to create new sites, enhancing the quality and extent of the feeding and roosting resource. The Strategy is also concerned with the functionally linked land, those areas that falls outside the sites designated for

¹⁸⁹ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#:~:text=Ancient%20and%20veteran%20trees%20can,They%20are%20also%20irreplaceable%20habitats>.

¹⁹⁰ <https://solentwbgs.wordpress.com/page-2/>

Waders and Brent Geese (SPA's) the functionally linked land is identified in supporting mapping for the Strategy¹⁹¹. The primary aims of the Strategy are as follows:

- to identify the network of core areas that are regularly used and are of fundamental importance to over-wintering waterfowl across the Solent;
- to maintain a network of sites through better management and protection from development and recreational pressure, and to ensure that they will be resilient to the pressures of climate change and predicted sea level rise in the future;
- to provide a strategy that will ensure that the network of important sites is protected, whilst reducing the current uncertainty over site use, in order to better inform key coastal stakeholders.

9.67 Whilst there are statutory mechanisms in place to designate areas of special protection for important habitats and species, there is a mismatch between such sites and the needs of the particular species or habitats of interest. Brent geese and wading birds are species of international importance generally protected under European legislation and specially protected within the Special Protection Areas (SPAs). However, birds are mobile, and they are also dependent on sites outside of formal designations and rely on the availability of a network of feeding and roosting resources.

9.68 The SWBGS provides information on the location of sites currently used by these birds, sites that are vulnerable to loss and sites that have potential for future use by waders and/or Brent Geese. The SWBGS classifies into categories the sites that act as supporting habitat to the SPAs based upon their comparative importance for the protected birds. The SWBGS is currently concerned with overwintering birds. However, PFSH have funded a study to understand the impacts of recreational pressure on summer/breeding SPA birds. The results of this are expected to be available in early 2024 at which point PFSH may consider expanding the remit of Bird Aware to cover these too.

9.69 The Solent area is heavily populated, and it is estimated that over 1.4 million people live within a ten minute drive of a car park on the Solent shoreline. Substantial additional housing is planned and much of this will be within a short distance of the coast. Based on studies elsewhere in the country, it is considered that new development would have an impact if it was built within a zone of 5.6km from the SPAs. This zone would include the whole of Portsmouth.

Strategic Policy PLP42: Solent Waders and Brent Geese Sites



1. Functionally linked sites which are used by Solent Waders and/or Brent Geese, as shown on the Solent Waders and Brent Goose mapping, will be protected from adverse impacts commensurate to their status in the hierarchy of the Solent Wader and Brent Geese Network as outlined in the Solent Waders and Brent Goose Strategy.

¹⁹¹

<https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647c8ba8bf0f3b8cfb7c1b>

2. Proposals that impact the functionally linked sites will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy (Guidance on Mitigation and Off- setting Requirements) document, and future updated guidance.

9.70 The purpose of the policy is to protect SPA supporting habitat used by protected Geese and Waders and ensure that where development does impact these sites the appropriate mitigation measures are provided.

9.71 The SWBGS identifies a network of supporting habitat¹⁹² used by the Brent Geese and Waders as follows:

- Core Areas: sites that have either; a network value; and/or the max score of 7 in the 3 metrics: GB Importance, SPA Importance and SPA Assemblage; and/or a max count of bird use of 1000 or more.
- Primary Support Areas: sites that have a score 3-6 in the 3 metrics: GB Importance, SPA Importance and SPA Assemblage; and/or sites that score 1 in the wader metric: Species Incidence.
- Secondary Support Areas: sites that have a score of 1-2 in the 4 metrics: GB Importance, SPA Importance, SPA Assemblage and Local Value.
- Low Use Sites: have records of birds but in low numbers (score 0).
- Candidate Sites: have records of high numbers of birds (max count equal to or greater than 100) and/or a total score equal to or greater than 1 in the 3 metrics: GB Importance, SPA Importance and SPA Assemblage but have less than 3 records in total.

9.72 The Solent Waders and Brent Goose Network is regularly monitored and new evidence is continually submitted by surveyors, which provides the knowledge base and evidence to support the Strategy. Continual review is necessary to ensure the strategy is up-to-date. This can result in changes to the classification of sites. In order to check the latest classification of a site, reference should be made to the SWBGS online mapping.

9.73 The Solent Waders and Brent Goose Strategy - Guidance on Mitigation and Offsetting Requirements¹⁹³ document sets out the mitigation requirements dependent upon site type. The guide includes details on how to provide mitigation, including habitat type, disturbance, area of habitat, timing and availability of habitat and geographic location.

9.74 The level of mitigation and off-setting required is dependent on the importance of the site within the ecological network and how these non-designated sites support the wider designated Solent SPA network.

9.75 An indication of the anticipated costs of mitigation are also included, including worked examples.

¹⁹² <https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

¹⁹³ <https://solentwbgs.files.wordpress.com/2021/03/swbgs-mitigation-guidance-oct-2018.pdf>

Recreational Disturbance on International Nature designations

Introduction

- 9.76 In addition to the mitigation requirements from schemes where there is a direct impact upon the habitat used by the Brent Geese and Waders as set out in Policy PLP42 there is also a need to offset the impact of recreational disturbance from new development. Bird Aware Solent¹⁹⁴ was set up in order to lessen potential recreational impacts from increased local housing development. The initiative is run by the Solent Recreation Mitigation Partnership, which is made up of 19 organisations and funded by contributions from all new residential dwellings within 5.6km of the SPAs. The current mitigation Strategy has an end date of 31st March 2034 which is six years before the end date of this Local Plan. It is intended that the Strategy is updated well in advance of its end date to inform future Local Plan updates.
- 9.77 Tens of thousands of birds come to the Solent coast for the winter and three Special Protection Areas (SPAs) have been designated for them. New housing around the Solent will lead to more people visiting the coast for leisure, with the potential to cause more disturbance to the birds. Research done by Bird Aware showed that additional disturbance will affect the birds' survival unless mitigation measures were put in place.
- 9.78 The planned mitigation measures are set out in the Solent Recreation Mitigation Strategy, which was endorsed by PFSH with the latest update published in 2020.
- 9.79 The main measures being implanted through the Strategy are a team of rangers to work with coastal visitors and communities to educate them about the birds and the adverse impact of recreational disturbance on them. Additional work is taking place to encourage responsible dog walking and visits to less sensitive parts of the coast. This work is particularly important as research shows that around 40% of bird disturbance occurs as a result of interactions with dogs.
- 9.80 PFSH provides governance to the Bird Aware Partnership, who mitigate recreational disturbance to SPA overwintering birds from additional pressures resulting from new house building. PFSH have funded a study to understand the impacts of recreational pressure on summer/breeding SPA birds, the results of this are expected to be available in early 2024, at which point PFSH may consider expanding the remit of Bird Aware to cover these too.



Strategic Policy PLP43: Recreational Disturbance on International Nature Designations

- 1. Planning permission for proposals resulting in a net increase in residential units will be permitted where a financial contribution is made towards the Solent Recreation Mitigation Strategy.**
- 2. In the absence of a financial contribution towards the Solent Recreation Mitigation Strategy, proposals will need to avoid or mitigate any in combination negative**

¹⁹⁴ <https://birdaware.org/solent/>

effects from recreation through a developer-provided package of measures for the lifetime of the development.

3. Development should avoid noise disturbance impacts on birds at the SPA sites and/or at identified terrestrial SPA supporting habitat sites though the overwintering period.

Supporting text

9.81 The purpose of the policy is to mitigate the impact of residential development and thus prevent additional recreational disturbance on protected Brent Geese and Waders.

9.82 The strategic measures set out in the Solent Recreation Mitigation Strategy require a financial contribution to be made for each residential dwelling built within 5.6km of the boundary of the Solent to mitigate the in-combination impacts of all new development on the SPA. This 5.6km buffer encompasses the whole of Portsmouth City and is the identified zone of influence for recreational disturbance on the Solent SPAs. This financial contribution covers the quantum of mitigation needed for the development to avoid having an adverse effect on the surrounding SPAs. However, some proposals by nature of their size and/or proximity to the coast may need to provide bespoke mitigation measures in addition to making the financial contribution in order to ensure effective avoidance/mitigation of impacts on the Solent SPAs. As a result, these types of development may require additional site-specific mitigation and will be determined on a case by case basis.

9.83 It is expected that the majority of schemes will mitigate their effects by payment of a contribution. The scale of the financial contribution is based on the number of net additional dwellings, and the number of bedrooms per dwelling. These figures will be updated on 01 April each year in line with the Retail Price Index. Further information on the Strategy and the contributions required can be found on the Council's or Bird Aware Solent website.

9.84 Development proposals which choose not to pay the financial contribution in accordance with the SRMS will have to demonstrate that an alternative package of mitigation measures would satisfactorily mitigate the adverse effects from recreational disturbance on the Solent SPAs. This should be carried out in consultation with Natural England

9.85 For the purposes of the SRMS a 'dwelling' includes net new dwellings created through the sub-division of existing dwellings, second homes, dwellings to be used as holiday accommodation, self-contained student accommodation and new dwellings created as a result of approval granted under the permitted development rights, for example change of use from office to residential. It includes permanent accommodation for gypsies and travellers; temporary/transit pitches will be assessed on a case-by-case basis by the local planning authority in consultation with Natural England.

9.86 If the housing scheme would have required a legal agreement for affordable housing or another matter then the provision of mitigation will be included in that. For all other schemes, applicants have the option of securing the mitigation package through either a

direct payment secured through a Section 111 Agreement or a Unilateral Undertaking; a copy of the s111 agreement is available on the Council's web page¹⁹⁵.

9.87 In order to avoid noise disturbance to birds at the SPA sites and at identified terrestrial SPA supporting habitat sites, percussive piling or works with heavy machinery (defined as plant resulting in a noise level in excess of 69dbAmax measured at the sensitive receptor) should be avoided during the bird overwintering period namely October to March inclusive. Where disturbance may occur as a result of construction activities, an assessment of impacts must be undertaken and mitigation measures outlined.

Nutrient Neutrality

Introduction

9.88 High levels of nitrogen draining from the Solent catchment area have caused excessive growth of green algae in a process called eutrophication. This is having a recognised, detrimental impact upon the region's internationally protected habitats.

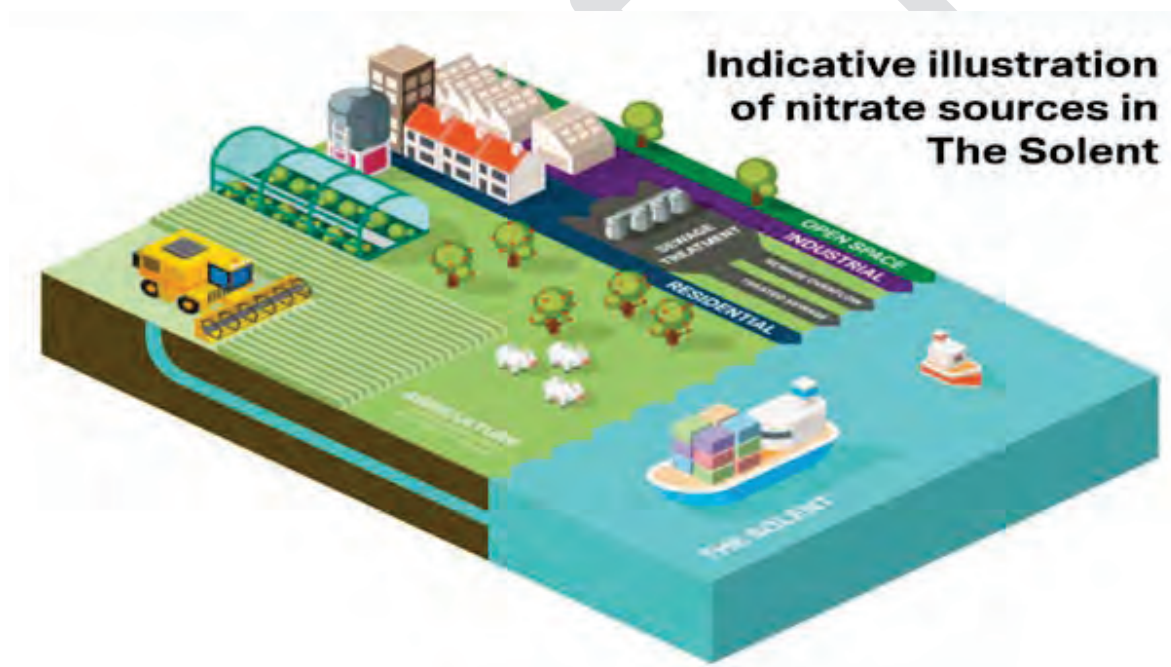


Figure 9.4: Nitrate sources in the Solent

9.89 Following changes in European Case law, Natural England advised Local Planning Authorities that all new development involving, or generating additional, overnight stays should be 'nutrient neutral', as one means of ensuring that development does not add to the existing nutrient burdens. Impacts from additional wastewater generated by new development on water quality must be appropriately addressed in order for the Appropriate Assessments of proposals to conclude that there are no adverse effects on habitat sites and for the Council's decisions to be legally compliant.

9.90 Mitigation measures to become 'nutrient neutral' are therefore required for additional dwellings (including the intensification of dwellings), tourism related development and

¹⁹⁵<https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/nitrate-mitigation-strategy/>

any other development likely to generate an overnight stay, due to the additional wastewater generated.

- 9.91 There is evidence that the principal nutrient that tends to drive eutrophication in the marine environment is nitrogen, as supported by modelling and research undertaken by the Environment Agency within the Solent estuaries. The best available evidence therefore indicates that the focus within the Solent catchment should be on nitrogen reduction. While the nitrogen inputs (oxidised as nitrates) are largely from agricultural sources, the (relatively minor) contribution from nitrates in permitted releases from Wastewater Treatments Works may be having a cumulative impact on protected habitats in combination with other sources of nitrates.
- 9.92 Natural England advise that the uncertainties regarding the impact of new development on designated sites must be recognised for all proposals that are subject to new planning permissions and have inevitable wastewater implications from additional overnight stays. Any increase is deemed significant, however small, due to the in-combination impacts. Natural England's stance is that the achievement of nutrient neutrality, with a calculated nutrient budget, if scientifically and practically effective, is a means of ensuring that development does not add to existing nutrient burdens and would enable Appropriate Assessments to conclude no adverse effects on international sites.
- 9.93 Portsmouth City Council approved the first version of its Interim Nutrient Neutral Mitigation Strategy for New Dwellings¹⁹⁶ to address the need for mitigation in 2019. The Strategy to date focused on the use of mitigation credits largely accumulated from water efficiency upgrades to the Council's housing stock to ensure there is no net increase in nitrogen output from the City. This 'business as usual' generated source of mitigation was only envisioned as able to provide 'credit' for a limited time (potentially 2-3 years). It has been subject to monitoring of both the water efficiency upgrade works and demand for/ uptake of the accumulated 'credit bank' by the development industry.
- 9.94 The Hampshire and Isle of Wight Wildlife Trust has developed a nature-based solution to provide nitrogen mitigation. The scheme works by acquiring intensively managed farmland that currently release high levels of nutrients (nitrogen) into the Solent and changing the way it is managed so that it is grazed less intensively or left to rewild to produce a much lower nitrogen output. The difference in nitrogen output can then be used to offset the impact of new development.
- 9.95 The PfSH Strategic Environmental Planning Officer (SEPO) team works with landowners on the behalf of the PfSH authorities to deliver an ongoing supply of sites to provide nutrient offsetting. Since the update to the Nutrient Neutrality Guidance in March 2023, the PfSH SEPO team have been looking for solutions in response to the demand for phosphate credits. The team is currently helping to bring forward three projects in Winchester District, the South Downs National Park and Eastleigh. In addition to these existing projects the SEPO team is developing a pipeline of future projects including the consideration of strategic PfSH level offset schemes.
- 9.96 It should be noted that nutrient budgets have been done for all sites allocated in this plan. The Council maintains a credit bank, which is currently made up of credits from water efficiency measures in City Council housing stock as well as credits from the

¹⁹⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Interim-Nutrient-Neutral-Mitigation-Strategy.pdf>

Hampshire and Isle of Wight Wildlife trust site at Nunwell on the Isle of Wight. The nutrient budget demonstrates that the city has a minimum of 5.5 years of nutrient credit supply.

9.97 On the 19th of December 2023 Central Government wrote to Local Authorities stating that: To stop pollution at source, the Levelling-up and Regeneration Act 2023 creates a new duty on water companies to upgrade wastewater treatment works (WwTW) by 1 April 2030, in catchments of Habitats Sites identified by the Secretary of State as being in an unfavourable condition due to nutrient pollution. This duty will be in effect from 26 January 2024 and the government will publish designated catchments and specific wastewater treatment works to be upgraded. The Act also requires planning decision-makers to consider these upgrades as certain for the purposes of an assessment under the Habitats Regulations. This is alongside funding for a £30 million Nutrient Mitigation Scheme in line with the Environment Secretary's direction of 28 July 2022. The Solent Catchment has secured a total of £9.6 million of this funding.



Strategic Policy PLP44: Nutrient Neutrality in International Nature Designations

1. Development proposals (except exempt development) will be permitted where they demonstrate through a nutrient budget that they secure Nutrient Neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits or a mixture of these.

Supporting Text

9.98 The purpose of the policy is to ensure that development proposals achieve nutrient neutrality to avoid having a detrimental impact on the recognised features of the internationally important habitats.

9.99 Mitigation is required for development which results in a net increase in population or draws additional visitors from beyond the catchment, due to the inevitable additional wastewater implications. This applies to planning applications, permissions in principle and prior approvals for the following:

- New dwellings and residential accommodation including changes of use
- Homes in Multiple Occupation enlargements (Class C4 Use to Sui Generis Use)
- Student accommodation
- Dwellings to be used as holiday accommodation including caravans
- Hotels
- Tourism attractions

9.100 Early discussion with the Council on the need for mitigation, determining the impact of the proposal and potential mitigation options is strongly encouraged.

9.101 The following approaches are currently considered to be acceptable, in principle, as means of achieving or contributing to nutrient neutrality:

- Mitigation Option 1: Offsetting against the existing lawful land use on an application site, extant permissions or other land controlled by the applicant; and/ or

- Mitigation Option 2: bespoke direct and in-direct mitigation measures, agreed in discussion with the Council and Natural England, for example, Sustainable Urban Drainage Systems (SUDS), interception or wetland creation; and/ or
- Mitigation Route 3: Purchasing of mitigation credits from recognised source of nitrogen mitigation: Purchase of mitigation credits from the Council or other landowner/ recognised source of mitigation credit, secured in perpetuity.

9.102 A mix of options can be applied. The purchase of the Council's mitigation credit (Option 3b) will be available to minor development proposals (9 units and below) and Portsmouth City Council development as appropriate. All mitigation proposals would be considered on a case by case basis and in consultation with Natural England.

9.103 Planning permission will not be granted until appropriate mitigation has been secured through a legal agreement. All proposals will be subject to standard conditions and require high level of water efficiency (an expected 110 litres per person per day as set out in Policy PLP33 on Sustainable Construction and Onsite Renewable Energy).

9.104 Agreed mitigation measures would need to be delivered prior to first occupation, which is when the 'harm' from additional wastewater would occur. A phasing of delivery and mitigation is possible for larger developments. Full details of offsetting options can be found in the Updated Interim Nutrient Neutral Mitigation Strategy for New Dwellings.

Open Space

Introduction

9.105 Portsmouth is one of the most densely populated local authorities in the whole of the UK. Overall there is a current provision of 555 hectares of open space in the City, the equivalent of 1 hectare per 375 people. The City Council's Open Spaces Study¹⁹⁷ and Addendum¹⁹⁸ show that there is currently an undersupply of open space in the City. Without the provision of new and improved open space in the City the undersupply is expected to worsen as the City's population grows. This policy therefore looks to encourage the provision of new and improved open space.

9.106 Access to high quality open spaces and opportunities for sport and recreation makes an important contribution to the health and well-being of communities. These spaces are also valuable areas for wildlife and biodiversity and make an important contribution to the City's adaptation and resilience to climate change. The NPPF provides protection for open space, sports and recreational buildings and land, including playing fields, which should not be developed unless very specific circumstances arise. It is in the interest of the City's residents to retain existing areas of open space whilst providing new areas as part of new development and addressing identified deficiencies to ensure the City retains a high-quality environment in which to live.

¹⁹⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-open-spaces-assessment.pdf> <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-open-spaces-assessment.pdf>

¹⁹⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Addendum-to-2018-Open-Spaces-Study-2021-compressed.pdf>

9.107 The Council's Open Spaces Study (2018) reviewed the quality and quantity of open space across the City and provides a supplementary piece of analysis to help inform open space needs. In particular it focussed on trying to identify need and deficiencies in types of open space across the Local Plan period. The types of open spaces assessed were:

- Facilities for Children and Young People.
- Amenity Greenspace.
- Public Parks and Gardens.
- Natural and Semi-Natural Greenspace.
- Allotments.
- Cemeteries and Churchyards.
- Outdoor Sports Facilities.

9.108 The Council's Open Spaces Study Addendum (2020) revisited the assumptions in the 2018 study and looked at the needs for open space in the City against the Fields in Trust standards. The open space requirements for the City are set out in table 9.1.

| Open Space Type | Standard (ha per 1,000 population) |
|--------------------------------|------------------------------------|
| Parks and Gardens | 0.8 |
| Amenity (informal) Green Space | 0.6 |
| Equipped play space | 0.25 |
| Total | 1.65 |

Table 9.1: Open Space requirements for new development

Development Management Policy PLP45: Open Space



- 1. Development proposals will be permitted where they seek to create, protect and / or enhance open space and if practicable improve accessibility to open space. Enhancements of existing open spaces should seek to maximise their quality, multifunctionality and accessibility and opportunity for social interaction.**
- 2. Development proposals that would result in the net loss of open space, including outdoor sporting facilities and recreational buildings and play spaces and playing fields will be refused, unless one of the following can be satisfactorily demonstrated:**
 - a) Existing provision is surplus to requirements based upon a robust assessment of City wide need; or**
 - b) Loss resulting from the proposed development would be replaced by equivalent or improved provision, in terms of quantity and quality, in an appropriate location; or**
 - c) Development would provide alternative open space provision, the benefits of which clearly outweigh the loss of the current or former use; or**
 - d) There are wider public benefits which outweigh the harm of the loss.**

- 3. Development proposals for 50 or more new homes will be permitted where they provide an area of open space to the ratio of 1.65 ha per 1,000 people. Proposals should provide a split of open space in line with the table of open space type requirements above where possible. Where it can be demonstrated that this is not feasible, an appropriate off - site provision and /or enhancement will be secured. In the last resort an appropriate developer contribution, will be used to enhance open space elsewhere in the city.**
- 4. The nature of new open space provision should consider the needs of the intended occupants and that of the local area, and the need to provide multi- functional spaces where practicable.**

Supporting text

9.109 The purpose of this policy is protect and enhance existing open spaces and to ensure that new open space provision is secured to meet the needs of the new and existing residents. The Council's existing open spaces are shown in figure 9.1, but it should be noted that the map is only indicative and should not be considered to be a comprehensive record of open space in the City.

9.110 All proposals are encouraged to provide or enhance access to open space. For larger residential proposals the policy sets a requirement for new publicly accessible open space to be delivered as part of the development to a standard of 1.65 ha per 1000 people (assuming 2.4 person average occupancy) in line with the Council's Open spaces addendum¹⁹⁹ for proposals of 50 or more new homes. Proposals should provide a split of open space in line with the table of open space type requirements above where possible. It is recognised that due to site specific constraints / requirements that this mix may not be practicable to deliver on all sites. Alternative mixes of open space provision will need to be justified to the satisfaction of the City Council. Where it can be demonstrated that this would be undeliverable on-site, other measures would need to be explored and agreed with the Council, such as local off-site provision or a contribution to the enhancement of nearby open space.

9.111 In order to demonstrate that open space is surplus to requirements reference will need to be made to the needs for the City as identified in the Open Space Needs and Opportunities Assessment²⁰⁰ and Addendum to Open Spaces Study.

9.112 When considering the provision of new or improved open space provision in terms of quality and quantity specific consideration needs to be given to the type of open space provided, including the patterns of existing and proposed usage by the intended users. The wider public benefits of the improved provision need to be considered including opportunities for health and wellbeing benefits, as well addressing localised deficiencies in different types of open space.

¹⁹⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Addendum-to-2018-Open-Spaces-Study-2021_compressed.pdf

²⁰⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-open-spaces-assessment.pdf>

- 9.113 Any new play or recreational provision should be informed by national guidance and the most recent available evidence on local need²⁰¹, as well as early discussions with the council.
- 9.114 A Community Use Agreement may be sought as a part of proposals for new outdoor playing pitches and/or artificial grass pitches (at schools or higher education establishments for instance) where appropriate, to be secured by planning condition.
- 9.115 Proposed enhancements of existing open space and recreation areas should consider opportunities to increase the multifunctionality of these spaces to maximise their use, and/or accommodate greater usage pressures, as well as deliver wider benefits such as enhancing biodiversity value or installing new and/or improved recreational facilities. The multifunctionality of open spaces should enable and encourage the use of the space by all residents of the City. Opportunity should be taken to accommodate the need for children and young people to play and be more physically active.
- 9.116 Improvements to open space should take incorporate biodiversity improvements in line with the Policy PLP40 on Biodiversity Net Gain.
- 9.117 The Council will look to help facilitate new and/or enhanced provision through directing planning obligations and/or the use of development contributions and other sources of funding for such purposes, where appropriate. Opportunities for new or enhanced open space provision have also been identified within the Local Plan's proposed strategic development sites where possible.

Local Green Spaces

Introduction

- 9.118 Local Green Space designation provides special protection for green areas that are demonstrably special and hold a particular local significance for local communities. The designation would rule out development other than in very special circumstances. The Local Plan designates and protects a number of Local Green Spaces.
- 9.119 All of the Local Green Spaces designated through the Local Plan meet the criteria set out in the NPPF. Full details of the assessment of the cities Local Green spaces can be found in the Local Green Spaces background paper²⁰².
- 9.120 Local Green Spaces specific to the Milton Neighbourhood Plan²⁰³ area were designated through the Neighbourhood Plan process and are identified on the Policies Map. Further Local Green Spaces may be designated through future Neighbourhood Plans.

²⁰¹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Final_playing_pitches_strategy_2018.pdf

²⁰³ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/neighbourhood-plans/>



1. The following green areas, as defined on the Policies Map, are designated and protected as Local Green Spaces, in line with the NPPF or its future equivalent:

- Southsea Common West, St Thomas & St Jude
- Southsea Common East, Eastney & Craneswater
- Kingston Park, Fratton
- Tamworth Park, Baffins
- Baffins Pond and Tangier Field, Baffins
- Great Salterns Recreation Ground, Baffins
- Hilsea Lines, Hilsea
- Alexandra Park, Hilsea
- College Park, Hilsea
- Gatcombe Gardens, Hilsea
- Gurnard Road Park, Cosham
- Cosham Park, Cosham
- King George Playing Field, Cosham
- Drayton Park, Drayton & Farlington
- Farlington Playing Field, St John's College Playing Fields and Farlington Triangle, Drayton & Farlington
- Farlington Marshes Nature Reserve, Drayton & Farlington
- Portsdown Hill
- Stamshaw Fields, Nelson
- Victoria Park, Charles Dickens
- Land at Leominster Road, Hempsted Green and Paulsgrove Park, Paulsgrove
- Highland Road Cemetery, Eastney and Craneswater
- Kingston Cemetery, Fratton

9.121 The purpose of Policy PLP46 is to designate and then protect Local Green Spaces, which are demonstrably special to the local community.

9.122 National policy sets out policy requirements for development on Local Green Spaces. Development proposals should not conflict with the reasons that the local green space has been demonstrated to be special to the local community or prejudice its role as a Local Green Space.

9.123 The Council will be supportive of development proposals on Local Green Spaces, which enhance the provision of facilities for amenity sport and recreation uses. The Council has significant need identified for a range of recreation, sports and amenity uses and limited space in the City in which they can be provided. The Council recognises the importance of the City's Local Green spaces and will only allow proposals which are in keeping with and provide enhancement to their character and setting.

Chapter 10 Infrastructure

Introduction

10.1 This section of the Local Plan covers six policy areas comprising one strategic policy and five development management policies relating to infrastructure development. The first strategic policy PLP47 Movement and Transport seeks to support sustainable transport networks and prioritise development which encourages walking, cycling, and public transport. Development Management Policy PLP48 Access and Parking addresses cycle parking, car parking and electric vehicle space allocations. The second Development Management Policy PLP49 Public Realm focusses on enhancing the quality and design of the public realm. Policy PLP50 Infrastructure Delivery sets out the requirement for sufficient provision of infrastructure. Policy PLP51 Electronic Communication and Utilities Infrastructure seeks to support and improve digital connectivity and minimise the impact on the environment. Lastly, policy PLP52 New and Existing Community and Leisure Facilities deals with existing and new community facilities for local people.

10.2 The National Planning Policy Framework (NPPF) states that in setting out the Local Plan's overall strategy for the pattern, scale and quality of development, sufficient provision must also be made for infrastructure. The term 'infrastructure' consists of physical, social and cultural provisions as well as 'green', 'grey' and 'blue' infrastructure. It includes but is not restricted to:

- Transport: roads, buses, ports, ferry and cruise services, walking and cycling routes
- Health: medical or social care facilities
- Education: early years, schools and universities, skills training and apprenticeships
- Energy and Utilities: electricity, gas, broadband, water and waste services
- Flood risk management: flood defences and sustainable drainage systems
- Social: community centres, leisure, sport and recreational facilities
- Green: parks, open spaces, woodlands, allotments, private gardens and green roofs
- Grey: roads, pipes, dams, seawalls, water treatment plants and drains
- Blue: ponds, lakes, streams, rivers, open coast

10.3 All types of infrastructure are required to support growth in the City. Portsmouth, like other towns and cities across the UK, faces a number of urgent challenges to growth and sustainable development relating to its existing infrastructure including limited public transport options, a fragmented walking and cycling network and poor air quality contributing towards above average incidences of health issues. From these challenges, there are opportunities for the development of sustainable and well-designed infrastructure facilities, services and systems and their surrounding spaces. These are required so that communities can thrive and to ensure progression towards meeting the Portsmouth vision and objectives.

10.4 Despite being one of the most densely populated cities in the UK, travel by walking, cycling or public transport has not always been viewed as an efficient or attractive mode of transport in Portsmouth. Nearly 90% of commuting trips within the City are shorter than 10km, and over 60% shorter than 5km. These are distances that can be easily covered on a bike by most people in less than 30 minutes. Pre-COVID-19, cars were found to make up around 80% of journeys into the City with around 40% of trips entirely within the City also being by car, despite these trips having an average length of only 5km.

- 10.5 Opportunities to promote sustainable transport will ensure that the negative environmental impacts of transport and traffic are reduced and facilitate residents to lead active and healthy lives. Access to sustainable transport infrastructure which provides safer, convenient, and accessible opportunities for active travel including walking, cycling and public transport for work, education and leisure is intrinsically linked to improved physical and mental health and wellbeing, reduced social inequalities and improved air quality. Limited access to good quality public and active travel connections is a barrier to employment, participation in post-16 education, and health services, contributing to widening socio-economic inequalities by limiting access to employment and travel for healthcare.
- 10.6 The Local Plan seeks to shape where new development should be located to create places, which are healthy, inclusive and safe. The availability of public service infrastructure including educational institutions such as schools and nurseries, and medical facilities such as hospitals, doctors and dentists is important for improving health outcomes and opportunities for learning. Access to high quality public spaces and social, cultural and recreational facilities encourage community cohesion by supporting social activity and providing health benefits. Improving the provision and quality of key infrastructure supports the wider objectives of the Local Plan for sustaining a strong and diverse economy, providing access to education and training opportunities for all, improved social wellbeing and cohesion, and mitigating the impact of climate change on communities across the City. The provision of high quality and reliable communications infrastructure can further encourage economic growth, technological innovation and support connectivity for residents and businesses by providing access to the internet, to deliver investment into developing Portsmouth as a smart city.
- 10.7 This Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies the City's infrastructure requirements, setting out what is needed, where it is needed and when it is needed. It is an essential document that ensures development happens in the right places at the right time, in a coordinated way. Further details are provided on delivery, funding sources, funding gaps and costs. The IDP is a live document and has therefore evolved throughout the production of the Local Plan and will continue to evolve through the life of the Plan.
- 10.8 The Local Plan seeks to protect and retain valued local Council and privately owned indoor community and leisure facilities, open space, outdoor recreation facilities and cultural facilities in accessible locations for the benefit of local communities to support health, social and cultural wellbeing.
- 10.9 Particular importance is also placed upon the requirement for potential development to deliver infrastructure to support the City's additional residents. Progress on the delivery of the infrastructure to serve planned development will be reviewed annually through the Authority Monitoring Report.

Movement and Transport

Introduction

- 10.10 Over recent years our collective dependence on private car use has resulted in unsustainable levels of carbon emissions from transport, unhealthy polluted air, regular traffic congestion and severely reduced levels of physical activity. Action is needed now to

shape a future where sustainable travel modes become the 'first choice' for as many trips as possible.

10.11 The compact character of Portsmouth provides a great opportunity to shape a future where people leave the car at home when making everyday journeys. Through the adopted Local Transport Plan 4 (2021–2038) (LTP4)²⁰⁴, Portsmouth City Council is striving to create an environment that allows everyone to travel as sustainably as possible.

10.12 The provision of a safe, convenient, affordable to use, and efficient transport network is key in helping to build vibrant local communities, enable regeneration, and achieve an environmentally sustainable future. Prioritising walking and cycling and transforming public transport will play a key role in delivering a people centred travel network across the City, linking into and connecting local areas.

10.13 In February 2022 Portsmouth adopted a Local Cycling and Walking Infrastructure Plan (LCWIP)²⁰⁵. Evidence from the preparation of the LTP4 found that 75% of the cycle routes surveyed within the City were sub-standard. A key issue is a lack of fully segregated, continuous cycle routes. Many on-road cycle lanes are alongside high traffic volumes, 30mph speed limits and no infrastructure to physically protect people cycling from motor traffic. This results in more people travelling via car. The aim of the Portsmouth LCWIP is to facilitate modal shift by creating a comprehensive walking and cycling network that is safe, inclusive, accessible, convenient and attractive, enabling people to get from A to B in the most direct way possible when making utility trips. Any successive updates of the LCWIP will be used to inform consents.

10.14 A Climate Emergency was declared by Portsmouth City Council in March 2019, pledging to achieve net zero carbon emissions in Portsmouth by 2030. In order to work towards achieving this goal, it is vital that sustainable transport is a key consideration as part of any development. New development needs to add as little as is realistically possible in terms of carbon generation from transport; this is also essential for addressing the parallel impacts on air quality. Policy PLP36 (Air quality and pollution) outlines in more detail the detrimental impact that poor air quality has on communities within Portsmouth. Delivering a sustainable transport network will help significantly towards reducing pollution levels within Portsmouth.

10.15 An ambitious vision has been developed within the LTP4 to deliver transformation in transport and travel within the City and wider City region. The vision is that:

By 2038 Portsmouth will have a people centred travel network that prioritises walking, cycling and public transport to help deliver a safer, healthier and more prosperous City.

10.16 Four strategic objectives underpin this vision:

1. Deliver cleaner air;
2. Prioritise walking and cycling;
3. Transform public transport; and
4. Support business and protect our assets

10.17 The Portsmouth Strategic Transport Assessment²⁰⁶ provides an assessment of the impact of potential housing and employment development (including all allocated sites) on

²⁰⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2021/11/74.633-Local-Transport-Plan-2021-Final-Accessible.pdf>

²⁰⁵ <https://travel.portsmouth.gov.uk/wp-content/uploads/2022/05/74.645-LCWIP-update-with-background-report-2022-Accessible.pdf>

²⁰⁶ <https://www.portsmouth.gov.uk/newlocalplanevidencedocu>

the transport network and tests measures to mitigate severe negative impacts. The study indicates that the development of the proposed Local Plan allocations can be accommodated if a suitable package of mitigation measures is provided. These mitigation measures include targeted improvements to walking, cycling and highway infrastructure, which seek to drive increases in the uptake and use of active and sustainable modes. The mitigation measures also provide for necessary changes to local and strategic highway infrastructure, in a manner which does not compromise or undermine the Council's stated wider transport aims. Each strategic site allocation within the Local Plan individually addresses transport and infrastructure.

Strategic Policy PLP47: Movement and Transport



- 1. Development proposals will be permitted where they deliver a people centred travel network that prioritises walking, cycling, public and shared transport, in line with LTP4, and which is compatible with the Council's Climate Emergency pledge.**
- 2. Improvements to transport infrastructure that align with the aims of LTP4 will be supported.**
- 3. Development proposals will be permitted where they are in highly accessible locations and facilitate access to public transport services and other sustainable transport, through the provision of connections to existing infrastructure, or the provision of new infrastructure to reduce the need to travel, prioritise walking, and cycling, and support and encourage use of public transport modes.**
- 4. Development proposals should contribute to the protection and/or delivery of a network of high quality walking and cycling routes throughout the City, including those identified in the Local Cycling and Walking Infrastructure Plan (LCWIP).**
- 5. Applications should be supported by a Travel Plan along with a Transport Statement or Transport Assessment in accordance with the thresholds set out in the Parking Standards and Transport Assessments SPD²⁰⁷ or future equivalent.**
- 6. Development proposals will be permitted where they protect and enhance highway safety on the local and strategic highway networks. Any significant detrimental impacts must be mitigated fully as approved by the Local Highway Authority and/or National Highways (where relevant).**
- 7. The design and site layout of new development must protect the safety and amenity of all and give priority to the needs of pedestrians, cyclists, users of mobility aids and other non-motorised forms of transport. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.**
- 8. Development proposals must be designed to accommodate the needs of people with disabilities by all modes of transport.**
- 9. All proposals should allow for efficient, safe and sustainable delivery of goods and access by service and emergency vehicles.**

²⁰⁷ <https://www.portsmouth.gov.uk/services/development-and-planning/supplementary-planning-documents/parking-standards-and-transport-assessments-spd/>

10. All proposals must maintain or enhance all transport interchanges and sustainable transport facilities where relevant.

Supporting text

- 10.18 The purpose of this policy is to deliver an approach to development that minimises the need to travel and maximises the availability of relevant sustainable transport options, so that growth in private vehicle use is kept to a minimum. It further seeks to ensure that highway safety is a priority for all development which impacts vehicular movement.
- 10.19 Shared transport such as car clubs and micro-mobility will have a vital role to play in enabling seamless and convenient travel across the City without a car. These methods of transport; in particular car clubs, can reduce the need for private car ownership, particularly for households that own more than one car.
- 10.20 To encourage the uptake and continued use of sustainable modes of transport, the location, design and layout of development will need to show priority being given to pedestrian, cycle movements and access to sustainable transport modes. There is the potential to further increase the uptake in sustainable transportation methods by improving and upgrading or providing railway, bus, cycle and other infrastructure. Improvements can make public and sustainable transport a more attractive option. There are several sustainable transport related projects that are being developed within Portsmouth. These can be found within the Infrastructure Delivery Plan (IDP) that supports the Local Plan.
- 10.21 Developments should be designed with accessibility, permeability and integration with existing networks in mind, considering all users, ensuring provision of, or access to, local services and facilities.
- 10.22 The Portsmouth Local Cycling and Walking Infrastructure Plan (LCWIP) highlights our priorities to improve walking and cycling infrastructure, emphasising the need to create an active travel network that encourages City-wide use. It aims to ensure that new infrastructure for walking and cycling will be accessible to everyone, including residents, people who work in the City, visitors and businesses. Applications for development will be required to contribute to the delivery of the LCWIP (and/or any successor documents) to raise the profiles of cycling and walking as viable alternatives to driving.
- 10.23 Active Travel England is the government's executive agency responsible for making walking, wheeling and cycling the preferred choice for everyone to get around in England. As a statutory consultee, they must be engaged with early on in the planning process.
- 10.24 A Travel Plan (TP) and Transport Assessment (TA), or Transport Statement (TS) will be required on development that generates significant amounts of movement in accordance with the thresholds set out within the current and any future Parking Standards and Transport Assessments SPD. Applications should be supported by a Travel Plan that will identify measures to facilitate and encourage the use of sustainable and active travel modes, thereby reducing the need to travel by motor vehicle.
- 10.25 The Transport Assessment or Transport Statement must set out mitigation measures that are necessary to ensure that development is sustainable and deliverable. They must also demonstrate the continued safe and efficient operation of the relevant strategic and

local road networks. Where development will contribute to impacts which have been assessed as part of the Strategic Transport Assessment and where mitigation proposals have been developed and set out in the IDP, either delivery of the corresponding mitigation measures or a proportionate contribution will be required. Mitigation measures identified within these documents will be secured by condition or the appropriate legal agreement.

10.26 A Travel Plan shall support the ongoing aim of encouraging more sustainable travel with measures to be secured via condition or legal agreement.

10.27 The scope of the TP, TA and TS must be agreed with the Authority at the earliest opportunity, with appropriate input from the local highway authority and National Highways if required. The impact of traffic generated from a development should be considered cumulatively by taking into account all committed development in the area including, where relevant, outside the City.

10.28 In assessing development proposals, national planning policy guidance states that development proposals will be required to demonstrate that they will not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network will not be severe.

10.29 When considering new development, it is necessary to consider its potential impact on the existing transport network, how it links to the network, impacts on highway safety and the provision for movement, servicing and parking. Development proposals will be permitted where they can demonstrate the mitigation of severe impacts on the local or strategic road networks, arising from the development itself and/or the cumulative effects of development, through the provision of, or contributions towards, necessary and relevant transport improvements including capacity and junction improvements and air pollution reduction measures. Capacity and junction improvements should look to sustainable modes first and then address residual impacts relating to vehicles more generally. Early engagement with the local highway authority and National Highways is required. Developments should be designed with accessibility, permeability and integration with existing networks in mind, considering all users. It is essential that new developments provide safe and suitable internal layouts and access to the highway network to minimise the likelihood of conflict between road users. Priority should be given to pedestrians, cyclists and users of mobility aids.

10.30 Given the geographical compact nature of the City, it is important to encourage more sustainable freight and deliveries city-wide. Developments should ensure they are of an appropriate design and layout to be able to adapt to any future sustainable freight and delivery mechanisms such as those outlined within Policy O²⁰⁸ and R²⁰⁹ of LTP4.

Access and Parking

Introduction

10.31 The unique geography and history of Portsmouth has resulted in the high density of local roads and terraced housing in the City. The growth of car ownership in recent years, combined with this has led to local roads struggling with the level of traffic that use them

²⁰⁸ Policy O: Deliver micro and macro freight-consolidation measures, supporting businesses and other organisations to consolidate their operational journeys, including use of zero emission vehicles for last mile delivery.

²⁰⁹ Policy R: Proactively manage kerbside space to enable flexible use for essential access.

and in particular, issues around parking. These roads are often at full parking capacity, making movement and access through them hard at times.

10.32 Car parking and its location has an impact upon the quality of the urban environment – how it looks, how it functions, how safe it is for road users and has influences on the choices people make when travelling. This Policy aims to provide good quality parking initiatives and practices in the City of Portsmouth, improve air quality and reduce climate change, in association with the strategic objectives of Portsmouth's LTP4.

10.33 To deliver the Portsmouth LTP4 vision and strategic objectives, a wide number of schemes, initiatives and strategies will be developed over its lifetime. The 'daughter transport strategies' to be developed in support of the over-arching transport strategy have been prioritised considering the dependency of high priority Portsmouth City Council projects, corporate priorities, Government strategy, requirements towards external funding bids (current or future) and whether the strategies are a statutory requirement. The Parking Strategy has been identified as a key priority and is the first daughter strategy to be developed.

10.34 The LTP4 outlines how a new approach is needed, with action required now to shape a future where people will choose to travel sustainably. The Parking Strategy, alongside work programmes which see improvements to travel choices, will help to create an environment that will make this possible, so private cars are not needed for every journey. It will consider demand management of parking in Portsmouth adapting to changing future demand and complimentary alternative travel modes.

10.35 The park and ride offers commuters and visitors a quick, easy and cheap way into Portsmouth. It is an exemplar mode of sustainable transport within Portsmouth and will remain central to the City's goals of reducing traffic, transforming public transport and enabling more effective management of parking within the City.

10.36 As part of this stepped change, the City Council will produce a new Parking SPD, which will replace the Parking Standards and Transport Assessments SPD in due course.

Development Management Policy PLP48: Access and Parking



1. Development will be permitted where it is located and designed in such a way that it seeks to discourage car use and encourages travel by other modes, unless off street parking provision can be justified. This could include car free development.

2. If parking is deemed desirable or necessary as part of a development it should be provided in accordance with the Parking Standards set out in the Parking Standards and Transport Assessments SPD or future equivalent and made neighbourhood plans as relevant. All new private and public parking provision must:

- a) Not give rise to unacceptable adverse impacts on amenity;**
- b) Be of a location, scale, layout and design that reflects its context;**
- c) Incorporate appropriate sustainable drainage systems; and**

- d) Where feasible, incorporate green infrastructure and renewable energy.
3. New development should be located and designed to incorporate infrastructure for charging plug-in electric vehicles and other ultra-low emission vehicles and consider provision of car clubs and other shared transport, in accordance with the Parking Standards set out in the Parking Standards and Transport Assessments SPD or future equivalent.
 4. Development proposals will be permitted where they provide sufficient levels of private, weatherproof and secure cycle and other micro-mobility parking to serve the needs of that development in accordance with levels set out in the Parking Standards and Transport Assessments SPD or future equivalent.
 5. Development proposals will be permitted where both on-street and off-street parking provision and site access protects and where possible enhances highway safety on the local and strategic highway networks. Any significant impacts must be mitigated fully as approved by the Local Highway Authority.
 6. Development proposals will be permitted where they provide parking facilities compatible for all users, including those with disabilities and reduced mobility.
 7. Proposals which would result in a net increase in the number of access points onto primary and distributor roads will not normally be permitted.

Supporting text

- 10.37 The purpose of this policy is to make an efficient use of land in Portsmouth and provide appropriate vehicle and bicycle parking in terms of amount, design and layout for residential and non-residential developments. This may include car-free developments where appropriate.
- 10.38 Parking provision should be made for everyone including those with disabilities and reduced mobility. Portsmouth's Parking Standards are set out in supplementary guidance which sets maximum levels of provision. If parking is deemed necessary as part of a development, the provision of vehicle and cycle parking for new development should be in accordance with the Parking Standards SPD and any successor documents.
- 10.39 The location of development should be carefully considered to reduce the level of parking required. However, where parking spaces are required associated with the proposed development, they should be carefully designed to ensure impacts on amenity are significantly reduced, including, but not limited to privacy, overshadowing, noise or pollution.
- 10.40 New vehicle parking areas, whether public or private, can negatively impact on landscape, the local environment, biodiversity and drainage when inappropriately sited and designed. The cumulative impact of changes on biodiversity and surface water run-off will be given particular consideration when deciding applications for the loss of existing garden space to car parking.

10.41 Permeable parking surfaces should be used in preference to impermeable surfaces for all types of parking unless there are overriding reasons that render their use unsuitable. Materials should be selected which are appropriate to the site context and predicted levels of use. Public parking spaces should, where feasible, introduce renewable energies such as solar panels. A similar concept has been introduced at Portsmouth International Port (as shown in figure 10.1 below).



Figure 10.1: Example of solar canopy within Portsmouth International Port

10.42 New development should incorporate levels of electric vehicle charging infrastructure in accordance with building regulations and any current or future guidance set out by PCC. Electric vehicle infrastructure should help towards the wider process of transport electrification within Portsmouth.

10.43 When considering new parking, it is necessary to consider its potential impact on the existing transport network, how it links to the network and how it may impact on highway safety. Development proposals will not be permitted where they do not protect highway safety.

10.44 In the interests of highway safety, the City Council will seek to prevent the proliferation of accesses and the interruption of the flow of traffic on primary and distributor roads and to ensure that efficient use is made of the available highway capacity. This policy is intended to safeguard against the introduction of individual access points at unscheduled intervals, rather than to impede the access of new development proposals, especially those allocated within this plan.

Public Realm

Introduction

10.45 The public realm is the space around, between and within buildings that is publicly accessible, including streets, squares, parks, open spaces and pedestrian and cycle routes. These spaces are dynamic elements that have a distinct and unique identity, whether they are spaces to move through or spaces to gather in. The quality and design of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors.

10.46 The public realm should be multi-functional, attractive and accessible for everyone; acknowledging that all genders, ages and abilities for example have different needs that must be met. It should contribute to the highest possible standards of comfort, security and ease of movement and enable everyone to participate equally, confidently and independently in everyday activities. This will help to create attractive and inviting environments that people want to live and work in.

10.47 Promoting good design and layout in a new development is one of the most important ways in which the Council can address community safety issues. Good designs and layouts can discourage criminal activity, increase the likelihood of detection and improve public perceptions of safety as outlined within the Portsmouth Reducing Crime through Design SPD²¹⁰. It is vital that the public realm incorporates design measures to prevent violence against women and girls. The significance of this issue is demonstrated through the launch of a Violence Against Women and Girls (VAWG) Task Group formed by the Police and Crime Commissioner for Hampshire and the Isle of Wight. This will not only seek to improve the operational response and support given to victims of these crimes, but will also focus on stopping it happening through prevention, and targeting and disrupting perpetrators.

10.48 National guidance places emphasis on the fundamental need to create high quality, beautiful, well-designed, sustainable spaces. The layout of streets and use of building types and materials should create a strong sense of place and welcoming, attractive localities.



Development Management Policy PLP49: Public Realm

1. Development proposals will be permitted where opportunities to enhance the public realm have been designed into the application, ensuring:

- a) The public realm is safe, healthy, accessible for all, inclusive, multifunctional, attractive, well-connected, legible and easy to maintain, and that it relates to the local, cultural and historic context;**
- b) Measures to prevent Violence Against Women and Girls (VAWG) have been incorporated;**

²¹⁰ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Reducing-Crime-through-Design-SPD.pdf>

- c) All aspects of the public realm incorporate design of the highest quality, including landscaping, green and blue infrastructure, lighting, acoustics, street furniture, and surfaces;
 - d) The avoidance of street clutter with space to congregate and socialise as well as move;
 - e) That it encourages walking and cycling and eases the movements of pedestrians, cycles, cargo-bikes, scooters, pushchairs, wheelchairs, mobility scooters and vehicular traffic within the site and to wider focal points within the city; and
 - f) Integration into key corridors and provides ease of access to areas of public convenience and amenity.
2. Major development proposals and allocated sites will be expected to create and enhance the public realm, supporting the wider sustainability of the city and providing site-specific multi-functional social and environmental benefits.
3. The Council will support the delivery of public art that helps to enhance the public realm. This should be context-sensitive and site specific taking into consideration the local and surrounding landscape and character. Evidence must be provided that shows how community involvement shaped the design and location of the public art.

Supporting text

10.49 The purpose of this policy is to create and enhance the public realm across the City for the benefit of everyone. The Seafrost Masterplan SPD²¹¹ and Portsmouth City Centre Development Strategy²¹² provide principles on public realm improvement for any development within these areas.

10.50 When designing a development proposal, the public realm should be considered as early on in the process as possible to ensure it meets all the requirements set out in Policy PLP49. The public realm must be accessible for everyone of all ages and abilities to enjoy and feel safe. Portsmouth's Reducing Crime through Design SPD sets out several good design principles that improve perceptions of safety and those which should be avoided. A safe public realm would provide significant socio-economic benefits allowing everyone to enjoy the space.

10.51 Measures must be included within developments that seek to eradicate violence against women and girls. Developments and their public realm must be places women and girls feel comfortable and safe. Measures can include natural surveillance (designing streets and areas that are overlooked); active frontages (to create a locality with human activity and regular movements); external lighting; defensible spaces; physical security features; and continued management and maintenance.

²¹¹ https://www.portsmouth.gov.uk/wp-content/uploads/2021/10/173.48-Seafrost-Masterplan_Accessible.pdf

²¹² https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Portsmouth-City-Centre-Development-Strategy-Jan-21_compressed.pdf

- 10.52 The public realm must incorporate elements of green infrastructure and incorporate ecological assets to encourage biodiversity net gain. Additional ways to provide multifunctional benefits includes activity areas, recreational facilities and linkages with routes for walking and cycling to allow easier access and movement to alternative locations within the City via sustainable modes of transport. Applicants should take account of Portsmouth's Greening Strategy.
- 10.53 Incorporating clearly signposted, well designed routes will allow access, ease and safety of movement for all modes of transport. The public realm should be designed to encourage the use of more sustainable modes of transport, handing more land over to cyclists and walkers.
- 10.54 Being a dense island City, there are many places that can be accessed on foot, bike or other non-motorised transport. It is important for development to deliver enhancements to these routes so they become a more attractive option over the use of a car. Important links include to and from train stations, transport interchanges and ferry terminals; links to and from employment and retail centres; links to and from cultural and historical focal points and links to and from visitor and tourist hotspots.
- 10.55 The public realm should be of the highest quality and easy to maintain to ensure it is future proof. Development should take into consideration any current and future design guide documents which seek to give direction on appropriate design features and specifications for appropriate furniture and material types according to purpose and physical context. Where possible, sustainable materials should be incorporated.
- 10.56 Larger sites within Portsmouth and those allocated within this Plan present a significant opportunity to create and deliver an enhanced public realm. These public spaces should focus on incorporating a multi-functional public realm. The public realm should be considered as early on in the process of developing sites to ensure these spaces are safe, legible, and inclusive for everyone.
- 10.57 Context-specific design of the public realm is important for maintaining and enhancing the attractiveness and distinctiveness of the City. The principle of new public art will be supported, especially when incorporated into the fabric of developments by the engagement of artists at an early stage in the design process. To ensure that proposals for public art will be supported, the involvement of the community is essential as early on in the design process as possible. Any application should show how the design has evolved through engagement with the local community and a decision reached that is supported by everyone.

Infrastructure Delivery

Introduction

- 10.58 Infrastructure delivery is critical to the sustainable development of the built environment. Timely provision of key infrastructure will be necessary to provide the services that residents require and support the level of new development proposed within the plan period. Infrastructure comprises the services and systems that communities need to function incorporating many physical, social and cultural provisions.
- 10.59 National guidance requires Local Plans to make sufficient provision for infrastructure through policy. This plan is supported by an Infrastructure Delivery Plan (IDP) which sets

out the infrastructure needs associated with the implementation of the Local Plan, how the required infrastructure will be delivered and how it will be funded. It identifies facilities that are needed city-wide as well as those that are needed to support particular strategic development sites.

10.60 The IDP is a live document and therefore it has evolved throughout the plan preparation period and will continue to evolve once the plan has been adopted. As part of the process, all infrastructure providers within Portsmouth were directly contacted to understand the ability for existing infrastructure to meet the Local Plan development quantum. Infrastructure providers were asked what the ability of existing infrastructure under their control was to meet the quantum of development proposed within the plan and whether any new infrastructure would be needed. Providers were then required to set out any plans they had to meet the need and provide information on how this would be funded. All responses helped inform the IDP that supports the Local Plan.

10.61 The Council will work together with partner authorities and infrastructure providers to strive to ensure that the infrastructure required as a result of the Local Plan's development strategy will be provided via the mechanisms set out in the IDP. Provision will also continue to be secured through the Community Infrastructure Levy, appropriate developer contributions and other sources of funding as applicable.



Development Management Policy PLP50: Infrastructure Delivery

1. Development proposals will be permitted where they:

- a) **Demonstrate that appropriate, necessary and reasonable infrastructure investment has been secured either in the form of suitable on-site or off-site works, and/or financial contributions to mitigate its impact;**
- b) **The whole life cost of infrastructure provision has been considered and appropriate mechanisms are in place for its future maintenance/care; and**
- c) **A programme of delivery has been agreed with the relevant infrastructure provider(s) prior to commencement of relevant infrastructure works and/or the development itself.**

2. Infrastructure delivery should be integrated with development phasing to ensure timely provision. Financial contributions towards future infrastructure maintenance will, where necessary, be secured by means of a legal agreement.

3. The provision of new or improved utility infrastructure by service providers will be supported in principle where it meets identified strategic and/or community needs, or enhances protection of the environment.

Supporting text

10.62 The purpose of this policy is to support the development of appropriate new infrastructure to meet the needs of the current and future residents of Portsmouth. New development should be adequately supported by existing infrastructure or make sufficient provision for any new infrastructure that is required to make the development acceptable in planning terms. The evidence needed to demonstrate compliance with this policy should be proportionate to the scale of development proposed.

10.63 Developer contributions, secured by planning obligations²¹³ (such as Section 106 agreements) and collected via the Community Infrastructure Levy (CIL), can be used to deliver infrastructure in the City. The levy funds can be used by the council to address the cumulative impacts of new development on infrastructure needs in Portsmouth, while planning obligations are legal agreements appropriate for funding infrastructure directly related to a specific development to make the proposal acceptable in planning terms.

10.64 Planning obligations will continue to be used for infrastructure requirements on development sites as appropriate, to secure site specific needs such as affordable housing (which will continue to be secured via S.106 agreements), open space provision and contributions to upgrading transport and highways networks.

10.65 The Council recognises that in some cases, there may be a requirement for new or improved infrastructure to be delivered before the development is commenced, whereas in other scenarios, the delivery of infrastructure will be required in line with completions or occupations. The Council will look to secure the delivery and timescale for delivery of necessary infrastructure through suitably worded planning conditions and/or obligations in legal agreements.

10.66 Where required, the Council will seek contributions via a legal agreement towards the enhancement of either on-site and/or off-site facilities, including strategic infrastructure in line with Regulation 122 of the Community Infrastructure Levy Regulations 2010.

10.67 In assessing the necessary provision or contribution, priority consideration should be given to any specific deficits or impacts identified, for the following types of infrastructure, as appropriate:

- Transport (to include electric vehicle charging infrastructure)
- Flood Risk Management Infrastructure
- Education
- Healthcare
- Green Infrastructure
- Recreational Facilities
- Community Safety Facilities

Electronic Communication and Utilities Infrastructure

Introduction

10.68 Electronic communication infrastructure includes development proposals related to the supply and management of fixed and wireless digital connections (gigabit broadband, including full fibre, and next generation mobile technology connections). Utility infrastructure includes development proposals related to the supply and management of water, wastewater, gas and electricity.

10.69 Utility connections are vital for all developments to run effectively and in recent years, much greater emphasis has been placed on the requirement for next generation digital connectivity and efficient use of existing networks. Ensuring effective and reliable digital communications networks is vital as the telecoms sector upgrades the analogue Public Switched Telecoms Network (PSTN) to digital voice services (VoIP) by 2025. The

²¹³ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/planning-agreements-and-obligations/>

changing nature of the UK telecoms infrastructure means that all aspects of life in the modern age will be wholly reliant on digital communication methods.

10.70 There are numerous benefits arising from effective and efficient digital infrastructure including the health, wellbeing, safety and security of residents. The digital economy is one of the fastest growing sectors in the UK economy and represents 5% of the national workforce²¹⁴; digital infrastructure is the backbone of economic growth and a priority for inward investment and job creation in the City of Portsmouth. Well-connected places attract and sustain modern businesses and can create the conditions for new clusters of digital and creative businesses to emerge. Effective digital and electronic communication networks support and enable environmental sustainability aims for example around issues such as energy use, travel and smart cities. As such, advanced, high quality, reliable, future proofed electronic communications infrastructure is essential for the City's economic growth, sustainability objectives and the social well-being and health of its residents.

10.71 The COVID-19 pandemic showed that digital connectivity is critical to societal resilience and business continuity in times of crisis. Working habits have now shifted enabling more flexibility to work from home which is likely to become commonplace in the future. Communications are dominated by mobiles, emails and other online forms. Shopping habits have moved online in recent years, further exacerbated by the COVID-19 pandemic.

10.72 To ensure the full benefit of digital capability is realised for the City, Portsmouth City Council supports the expansion of electronic communications networks and policy PLP51 sets out how high-quality electronic communication infrastructure is expected to be delivered, maintained and upgraded over time.

10.73 National planning guidance supports the provision of infrastructure for all utilities and in particular the expansion of electronic communication, thereby showing its importance in today's society.



Development Management Policy PLP51: Electronic Communication and Utilities Infrastructure

1. Development proposals for new electronic communications and/or utilities infrastructure will be permitted where:

- a) All opportunities to make the most efficient use of existing electronic communication networks and utilities infrastructure have been explored fully and the identified need cannot be met using appropriate existing infrastructure or other appropriate structures;**
- b) They are of an appropriate design that would not have an adverse impact on the character or appearance of the local area or host building and minimise the impact on public amenity;**
- c) They minimise environmental impacts; and**

²¹⁴<https://www.gov.uk/government/statistics/dcms-sector-economic-estimates-employment-apr-2021-mar-2022/digital-sector-workforce-analysis-technical-report>

- d) **They remove, reduce in prominence, or move underground related existing infrastructure, where feasible.**
- 2. Where one or more infrastructure providers have agreed to provide superfast broadband connectivity or full fibre, the development should be designed to connect to this service and make it available to occupiers.**
- 3. Development proposals for all residential and non-residential buildings will be expected to be served by superfast broadband connection as a minimum and full fibre connections where available. If this cannot be achieved, it must be robustly demonstrated with evidence of consultation with relevant service providers confirming this would not be deliverable.**

Supporting text

- 10.74 The purpose of this policy is to deliver appropriate new electronic communications and utilities infrastructure across the City to ensure the efficient operation of the network and easy access to fixed and/or wireless digital connectivity without causing detrimental impacts to local distinctiveness and public amenity. Ensuring the wide availability of high-speed broadband and next generation mobile infrastructure is a central part of the Government's National Infrastructure Strategy, the UK Wireless Infrastructure Strategy and levelling up agenda. The Government has a target that 95% of the UK landmass will be covered by 4G by 2025, and 99% will have gigabit broadband by 2030²¹⁵. Good quality digital infrastructure where we live, work or travel is needed to access online public services, social networks, as well as healthcare, education, retail and financial services.
- 10.75 When proposing development that would require new utilities connections/infrastructure, it is essential that all effort should be made to use existing infrastructure where appropriate. This policy should be read in conjunction with Policy PLP32 (Sustainable Drainage Systems) which provides detail in relation to separation of surface water on site and connections to combined systems. For example, all effort should be made to use existing masts and other structures in relation to electronic communication infrastructure, including local authority assets already connected to a full fibre network. Only when all options to use existing infrastructure have been exhausted, can a proposal be submitted for the development of new infrastructure. This is to ensure that existing infrastructure is operating to optimal capacity and efficiency and there is minimal street clutter and visual obstructions.
- 10.76 Where new infrastructure is required, its design must be carefully considered to ensure that it does not detrimentally impact local distinctiveness or public amenity. A balance needs to be struck between protecting the City's heritage, culture, environment and landscape while continually improving digital connectivity. The siting and appearance of the relevant infrastructure should be carefully considered with mitigation measures such as screening incorporated appropriately and sensitively.
- 10.77 Given the critical importance of digital connectivity, it is expected that all new developments are supplied with superfast broadband unless it is robustly evidenced that this is clearly not a viable option. Applicants are expected to clearly demonstrate they have held discussions with a range of providers to upgrade infrastructure to deliver superfast

²¹⁵ <https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy>

broadband, reliable next generation wireless connectivity or full fibre. If technological advancements are made within the plan period, all relevant proposals should provide suitable up-to-date alternatives.

New and Existing Community and Leisure Facilities

Introduction

10.78 Community infrastructure facilities have a vital role to play in supporting vibrant local communities in Portsmouth. They enable essential public services to be provided as locally as possible. Many community and leisure facilities are owned and/or managed by the City Council, but some are privately owned, including small shops, public houses and theatres. Some community facilities are defined, but are not restricted to the F2 local community use class in the Use Class Order. For the purposes of the Portsmouth Local Plan community and leisure facilities include, but are not restricted to:

- Community centres
- Education facilities for all ages
- Healthcare facilities
- Cultural facilities
- Libraries
- Public houses
- Leisure centres, sport pavilions, swimming pools and gyms
- Small shops selling essential goods, including food, to visiting members of the public

10.79 Facilities such as these, help support health and wellbeing, social interaction, inclusion, cultural identity and are vitally important building blocks for a City such as Portsmouth.

10.80 Indoor sports facilities help to support health and wellbeing in the City. Portsmouth has above average incidences of several health issues, particularly within the more deprived areas of the City; this can create barriers to participation in sporting activities. Accessible high quality community and sports facility provision is necessary to avoid worsening inequalities and to help move towards greater health and wellbeing for all.

10.81 Information and research regarding sports provision within the City is set out within the Council's Sports Facilities Strategy (2017)²¹⁶. This study found that areas in the north and north-east of the City have lower access to facilities and that there is an overall need for more accessible provision (non-membership only access) to meet current and projected future demand. Many of the recommendations set out within this strategy are still being implemented with various schemes coming forward across the City. Once these schemes have been developed further, a new strategy will be undertaken.

10.82 Once lost, valued local facilities can be hard to replace. In Portsmouth there is an existing network of both Council and privately owned indoor community and leisure facilities. It is important that these spaces are protected and retained in accessible locations.

10.83 Community facilities will be provided on a number of our Strategic Sites such as Portsmouth City Centre. Reference should be made to the individual allocations for details.

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<https://democracy.portsmouth.gov.uk/documents/s14923/03.1%20Portsmouth%20City%20Council%20Sports%20Facility%20Strategy%202017%20-%20exec%20summary.pdf>

10.84 Many community and leisure buildings are defined as town centre uses and so the town centre policies in the Thriving Economy chapter may be relevant to planning applications affecting community and leisure facilities.

10.85 The Community Right to Bid Regulations enable local community groups to nominate properties in the City to be listed as Assets of Community Value. On receiving the nomination from an eligible community group, the Council will determine the nomination against the legislation to ensure it meets the specific criteria for recognition and will then record these in a register of assets or nominations.



Development Management Policy PLP52: New & Existing Community & Leisure Facilities

1. Development proposals for new and/or expanded community and leisure facilities will be permitted where:

- a) **The site is accessible and inclusive to the local communities it serves;**
- b) **Appropriate consideration has been given to the shared use, re-use and/or redevelopment of existing buildings in the local community; and**
- c) **The scale of the proposed infrastructure is proportionate to the local area.**

2. Development proposals that would result in the loss of, or have an unacceptable adverse impact upon, an existing community facility or leisure facility that is fit for purpose will not be permitted unless:

- a) **For commercially run community facilities, evidence is provided of a robust marketing campaign of at least 12 months that clearly demonstrates there is no market demand for the existing use or an equivalent community use in line with the requirements set out in Appendix 4 of the Local Plan; or**
- b) **For community or publicly owned or managed facilities, it can be robustly demonstrated that there is a lack of need for the existing facility, or an equivalent community use and its retention would not be practical or viable; or**
- c) **Alternative community facilities are provided that are accessible, inclusive and available, and of an equivalent or better quality to those lost, without causing unreasonable reduction or shortfall in the local service provision.**

3. Development proposals for community and leisure facilities that are listed as Assets of Community Value will in addition to the protection offered to all community facilities will, when relevant, be subject to a six month statutory delay on sale.

Supporting text

10.86 The purpose of this policy is to support new facilities and protect existing community and leisure facilities that are fit for purpose and serve the local communities in Portsmouth.

- 10.87 It is important that local people are involved in decisions about their community and leisure facilities. All planning applications for new community facilities will need to provide evidence of a community engagement exercise to gauge public support. The preparation of this evidence should be proportionate to the scale of the development.
- 10.88 The City Council will safeguard all existing community and leisure facilities that are fit for purpose from development proposals for non-community uses. Where a development proposal could lead to the loss of a community facility or reduce its scope and/or viability, the City Council will expect applicants to provide very strong justification for this loss or diminishment. There is a presumption that community and leisure facilities should be retained or replaced with proposals of at least an equivalent standard. Appropriately sized proposals, which would provide inclusive shared services through the joint use of facilities in accessible locations, will be supported in principle. Full details on marketing requirements are set out in Appendix 4 of this Local Plan.
- 10.89 The Community Right to Bid Regulations enable local community groups to nominate properties in the City to be listed as Assets of Community Value. The Council will determine the nomination against the legislation to ensure it meets the specific criteria for recognition and will then record these in a register of assets or nominations.
- 10.90 Under the legislation, communities have the opportunity to ‘stop the clock’ for up to six months on the sale of valued community assets such as a local pub or shop. This window of opportunity gives communities time to create a business plan and gather the necessary finances to bid for the asset. However, it should be understood that the owner of the asset is not obliged to accept an offer from a community interest group. More information on the nomination process, including a list of assets and nominations in Portsmouth can be found online²¹⁷.

²¹⁷ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/community-right-to-bid/>

Chapter 11: Heritage

Introduction

11.1 Portsmouth is an island City with an historic environment that is both extensive and diverse geographically and through time. Table 11.1 sets out the full extent of designated and non-designated heritage assets in the City, and a number of the strategic sites allocated in this Plan derive much of their character from heritage assets. Portsmouth's rich historic legacy represents both a positive and an irreplaceable asset. It tells the City's wider story, contributing to its sense of place, community and its local distinctiveness. Valuable in economic terms, the City's heritage assets are a key driver in people's perceptions and recognition of the City, and are also critical to its economic vitality, attracting very large numbers of tourists to the Historic Dockyard and its historic waterfront. They also provide an inspiration for the renewal and creation of attractive places for people to enjoy. The Imagine Portsmouth 2040 Vision includes the City's rich cultural heritage and a strong maritime history. The heritage policies set out in this chapter seek to fulfil the Local Plan objectives of nurturing a City rich in culture and creativity, which in turn will help to drive a thriving economy. They should be considered alongside Core Policy PLP1: Design.

| Asset Type | No. of Assets (2023) | |
|---|----------------------|----------------------------------|
| Scheduled Monuments | 17 | |
| | List Entries | Individual Buildings/ Structures |
| Statutory Listed Buildings: | 463 | 707 |
| Grade I | 21 | |
| Grade II* | 34 | |
| Grade II | 483 | |
| Conservation Areas (Article 4 Directions in Conservation Areas) | 25 (28) | |
| Registered Historic Park | 3 | |
| Locally Listed Buildings | 264 | |

Table 11.1 Historic assets in Portsmouth

11.2 Portsmouth has been shaped throughout its history by the presence of the Royal Navy. However, the City also has an extensive legacy of non-military assets and archaeology, the latter dating back to the Bronze Age.

11.3 The presence and expansion of the Naval Dockyard in the City led from the late eighteenth century onwards to its gradual emergence as one of the single largest industrial sites in the world. The City's rise to industrial powerhouse was also mirrored by rapid physical expansion. From the mid-nineteenth to the early twentieth century over 60,000 terraced houses were built, many for working class labourers and artisans employed in the dockyard. The best examples of these are protected within a number of

the City's 25 conservation areas. In addition, an infrastructure of parks, churches, theatres, cinemas, hospitals and other buildings was developed to serve the town's leisure, health and pastoral needs; a very high proportion of these are protected through designation. This legacy is significant, illuminating the social, military and cultural past of the City, and thereby contributing very strongly to its identity and sense of place.

11.4 In the early nineteenth century the southern part of Portsea Island began to develop differently. Under the 'guiding hand' of local architect T.E. Owen, Southsea emerged as an elegant and picturesque satellite settlement catering to the housing needs of a burgeoning middle class. Its attractive historic core is also a conservation area and has a wealth of listed gothic influenced villas designed by Owen. Southsea Common became an extensive pleasure ground and is one of three registered historic parks in the City along with Victoria Park and Kingston Cemetery. The combination of Southsea Common with several miles of seafront promenade provides a seafront of exceptional quality perhaps unrivalled by any city of comparable size in the country. Other highlights include the civic pride of the City's listed neoclassical but rebuilt Guildhall. Charles Dickens' Birthplace is located close to the City Centre. A number of Britain's greatest writers including H.G. Wells, Sir Arthur Conan Doyle, Rudyard Kipling and Neville Shute lived and worked in Portsmouth, contributing to its great cultural heritage.

11.5 The city's fortunes reached a low ebb in the mid-twentieth century. It was amongst the most heavily bombed cities in Britain after London during the Second World War. Over six thousand buildings were totally destroyed and tens of thousands damaged. Reconstruction was relatively slow and left its mark with a series of mass housing estates. The administrative and commercial heart of the City has a limited but notable number of high quality modernist buildings. A small number of twentieth century sites, including the City's two most important war memorials, and the former European headquarters of IBM, designed by Norman Foster, have also been listed.

11.6 This chapter of the Local Plan includes a strategic policy on heritage followed by three development management policies relating to listed buildings, conservation areas and archaeology. Collectively, the scope, focus and detail of these policies is considered to take into account:

- The desirability of sustaining and enhancing the significance of the city's heritage assets and putting them to viable uses consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that conservation of the city's- historic environment can bring; and
- The desirability of new development making a positive contribution to Portsmouth's character and distinctiveness.

11.7 The policies are tailored to the specific needs and priorities of Portsmouth and seek to ensure a degree of pro-activity in the management of the City's assets sufficient to: make a positive contribution to Portsmouth's local character and distinctiveness, afford appropriate protection for the City's assets, and to provide a clear and positive strategy for their conservation.

11.8 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. This is a result of the disparity between the costs of

renovating a heritage asset in a suitable manner and its final end value. The difference between these two figures is known as the 'conservation deficit'. One recognised way of ensuring that sufficient funding is generated to address any shortfall in renovation costs, is through a process known as 'enabling development'. This allows for development in a location, or of a nature or form that would normally be considered unacceptable in planning policy terms. For this reason, it must be considered a process of 'last resort', acceptable only in extreme cases where other potential options have been exhausted. The scale of any proposed development must constitute the minimum required to address any deficit, and it must also bring public benefits sufficient to justify its use - which could not be achieved by other means. The City Council will use current (or successor) guidance produced by Historic England to assist in determining any applications that are considered to propose enabling development.

11.9 The recording and the subsequent management of such assets relies upon the City's Historic Environment Record (HER). The HER is a unique dynamic resource that includes a database containing information from the prehistoric period to the present day. It provides information on a broad range of assets including buildings and structures, earthworks, buried remains, stray finds, landscape features, archaeological investigations and historic sites that may have been destroyed or are known from documentary sources. The HER also contains information about nationally designated, locally designated and undesignated heritage assets. The City's HER is based within Portsmouth Museum Service' and will be consulted as part of the process to identify, record and manage such assets.



Strategic Policy PLP53: Historic Environment

- 1. Development proposals will be permitted where they conserve or enhance the City's heritage assets in a manner appropriate to their significance.**
- 2. Development proposals which affect heritage assets, or their setting, will be determined with regard to the significance of the asset. Proposals which are considered to substantially harm the significance of a designated heritage asset will not be permitted except in exceptional circumstances. Substantial harm to, or loss of assets of the highest significance (Scheduled Monuments, Grade I, and II* listed buildings and registered parks) should be wholly exceptional and should only occur where a robust justification has been made in accordance with the requirements of the NPPF. For proposals that would cause less than substantial harm, their impact should be weighed against the public benefits of the proposal including, where appropriate, securing optimum viable use of the asset.**
- 3. Where a development proposal would impact on the fabric or setting of a designated or non-designated heritage asset, the applicant will be required to provide a supporting Heritage Statement (HS). The statement should be proportionate to the significance of the asset, and the scale of any proposed work(s). Its content should describe the significance of the asset, identify the impact of the proposal on that significance, and provide a clear justification (rationale) for any development, (particularly where a proposal would result in any harm to asset(s) or their setting). In preparing the statement, the applicant should as a minimum consult the City Council's Historic Environment Record.**

- 4. Development proposals that would improve the condition of heritage assets that are considered to be 'at risk' through neglect, decay or other threats will be encouraged and supported. Where appropriate the Council will seek positive conservation centric solutions for these assets through engagement with owners and as a last resort may consider the possible use of statutory powers to help achieve these objectives.**
- 5. Development proposals which secure the long term conservation or enhancement of redundant or under-used heritage assets including their setting through their optimal/ viable (re)use will be supported.**
- 6. Proposals for alteration and/ or extension that conserve or enhance the significance of non-designated heritage assets will be supported. Non-designated heritage assets should be retained where appropriate.**
- 7. Development proposals for works to heritage assets that are intended to adapt to, or mitigate the effects of, climate change will be supported where it can be clearly demonstrated that they conserve the fabric and/or setting of the asset. A whole building approach is recommended for the retrofit of traditionally constructed buildings, informed by heritage expertise.**

Supporting text

- 11.10 The purpose of Policy PLP53 is to set out a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets. It is important that proposals are based on a meaningful understanding of the historic context and character of an asset and its surrounding area. Proposals should be informed by the Historic Environment Records (HER)²¹⁸, Conservation Area Appraisal and Guideline Documents²¹⁹, and any other relevant policy or guidance.
- 11.11 Development proposals can affect the significance of heritage assets in a range of different ways. Physical impacts to an asset's fabric can range from minor alterations to the complete loss of the asset. Other impacts may not physically alter the asset, but instead affect its setting, which in turn may impact its significance. Carefully considered changes to assets and/ or their setting may prove to be sympathetic and positive. However, adverse impacts including cumulative impacts can create negative perceptions, long-term decline or even loss of significance.
- 11.12 In determining applications likely to have a bearing on the setting of heritage assets, guidance published by Historic England (or any other method agreed between the applicant and the LPA) may be used to assess impact.
- 11.13 In order to assess significance it is essential to have a sound understanding of the original purpose, development, use and history of an asset. In light of this, all planning

²¹⁸ <https://portsmouthmuseum.co.uk/collections-stories/historic-environment-record>

²¹⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/conservation-areas/>

and Listed Building Consent applications that affect or have the potential to affect heritage assets and their setting, including sites with archaeological potential, must be supported by a Heritage Statement.

- 11.14 The Heritage Statement should identify the significance of the asset and set out the impact of the development. The applicant or their agent should consult the City's HER. The level of detail required to support the application should be proportionate to the significance of the heritage asset and the impact of the development. In all but the most trivial cases, assessment of potential impact on the significance of the asset is likely to require input from conservation professionals with appropriate qualifications and experience.
- 11.15 It is important to distinguish between potential harm that is 'substantial' and that which is 'less than substantial.' Substantial harm will relate to those impacts, which wholly or partially destroy the significance of an asset or impinge upon the role of its setting to an extent which undermines its essential appreciation. In any assessment of substantial harm, Planning Practice Guidance makes clear that what matters is the impact on the significance of the heritage asset. It also clarifies that in general terms it is a high test, so it does not arise in many cases. Notwithstanding this it should nevertheless be noted that less than substantial impacts may still prove significant, with some heritage assets being highly sensitive to change.
- 11.16 In cases where harm to significance is assessed to be substantial, but justified by considerations of continued use, re-use or wider public benefits, mitigation by recording will be required as a condition of consent. This would include the creation and deposition of a project archive containing both documentary material and artefacts with Portsmouth Museum. A copy of a report would also be required to be deposited with the city's HER.
- 11.17 The ability to record evidence should not be a factor in deciding whether such a loss should be permitted. In instances where some degree of harm to heritage assets or their setting is considered justified when balanced against public benefits, these benefits should be compelling, measurable, realistic and capable of delivery.
- 11.18 At risk assets are those which have been identified through the Historic England Risk Register. They are considered to be falling into disrepair and therefore 'at risk' of serious deterioration or loss through neglect, decay or other threats. The identification, monitoring and where possible enhancement of Buildings at Risk is an area of concern for the Council. Portsmouth's significant legacy of military and other types of buildings, some of which, by their nature are obsolete, can raise particular challenges. These have been previously addressed through the integration of threatened assets in to new developments.
- 11.19 Sustaining heritage assets in the long term often requires investment and putting heritage assets to a viable use is likely to enable the maintenance necessary for their long-term conservation.
- 11.20 Certain heritage assets may have limited or no scope for new uses and indeed may be so sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

- 11.21 It is important that any use is viable, not just for the owner, but also the future conservation of the asset. The optimum viable use may not necessarily be the most profitable one. If there is only one viable use, that use is the optimum viable use. If there are a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.
- 11.22 Non-designated heritage assets are those assets considered by the City Council, rather than the Secretary of State, to be of local historic or architectural interest. Their status is a material consideration in the determination of relevant planning applications.
- 11.23 Any Buildings or structures on the Council's list of locally important assets (The Local List) is defined as a 'non designated heritage asset'. Where a building or structure is not included on the Local List the Authority may nevertheless still judge (at its discretion) that it has the status of a non-designated asset for the purposes of decision making. The City's HER will be consulted as part of the process to identify any non-designated assets not included on the Local List. The significance of non-designated heritage assets should be carefully assessed, and the desirability of their conservation weighed against wider public benefits as planning applications are considered and determined.
- 11.24 Portsmouth currently has three registered parks/garden: Victoria Park, Southsea Common and Kingston Cemetery (southern section), which are all registered at Grade II. The purpose of inclusion on the register is to identify important historic parks and gardens in order to increase awareness of their existence and encourage their protection and conservation. Status as a registered park garden does not entail additional statutory controls. Its status is however a material consideration in the determination planning applications. Sites should receive special consideration if changes or proposals for development are being contemplated.
- 11.25 The City Council has declared a Climate Emergency and so opportunities to reduce carbon emissions through improvements to the energy efficiency of existing buildings are in principle welcomed. The contribution that the retention and reuse of old buildings makes to the preservation of embodied carbon (as well as to local distinctiveness), together with the sustainability of traditional building materials and design is significant, given the nature and scale of the City's existing building stock. It also has the potential to be a factor in decision making regarding the acceptability of the demolition/ loss of existing buildings. In this context, avoiding demolition and favouring sensitive retrofit of historic buildings is preferable where possible. It is incorrect to assume that older buildings will inevitably be less energy efficient than modern ones. Historic buildings can, and many do, perform well in terms of energy efficiency. The retention of original/ historic materials and feature is frequently more cost effective in energy terms than their replacement with modern equivalents. Depending on the significance of the asset, and the siting/ location of any interventions, works to improve energy efficiency can generate adverse/harmful impacts to the fabric/setting of assets. As a starting point, solutions that avoid impact(s) to the fabric or setting of assets should be prioritised.
- 11.26 Where a proposal related to the improvement of an asset's energy efficiency is considered necessary, and would require Planning Permission and/ or Listed Building Consent, technologies/ solutions that minimise and or mitigate any potential impacts should be prioritised.

Listed Buildings

11.27 There are circa 700 listed buildings and structures in Portsmouth and these form an important part of the City's historic character and sense of place.

Development Management Policy PLP54: Listed Buildings



- 1. Development proposals which affect a listed building or its setting will only be permitted and Listed Building Consent and or Planning Permission granted where:**
 - a) They preserve or enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or**
 - b) Harm to the significance of the listed building or its setting is minimised and considered to be outweighed by public benefits by the Council. In such circumstances appropriate mitigation measures will be expected, including archaeological investigation including a written report or recording.**
- 2. Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.**

Supporting text

11.28 The purpose of Policy PLP54 is to set out more detailed criteria for development proposals affecting listed buildings.

11.29 It is necessary to consider the character and significance of listed structures in a holistic manner; the character of their interiors can be as important as their external appearance. The protection and enhancement of all aspects of significance should be considered and great weight will be given to their preservation and, where appropriate, their restoration to optimal condition.

Conservation Areas

11.30 Portsmouth has 25 conservation areas, which are each designated for their special architectural or historic interest. Maps and Guidelines can be found on the City Council's website²²⁰ along with Article 4 Directions where relevant. The City Council will seek to provide and update Conservation Area Appraisal and Guideline documents for the City's conservation areas.



Development Management Policy PLP55: Conservation Areas

- 1. Development proposals within a conservation area, or within its setting, will be permitted where they preserve or enhance the character or appearance of the conservation area.**
 - 2. Development in a conservation area will be permitted where:**
-

- a) **Architectural features such as walls and shop fronts and other features which contribute to the character of an area are retained;**
 - b) **There is no adverse impact on the townscape and roofscape of the conservation area, including the protection of important views within, into and out of the area;**
 - c) **A consistently high standard of design has been applied and good quality materials, especially those that are locally sourced and/ or distinctive are proposed to be used; and**
 - d) **Trees, open spaces and other landscape features which contribute to the character and appearance of the conservation area are protected.**
- 3. Within a conservation area, development proposals which involve the total or substantial demolition of buildings or structures will only be permitted where it is demonstrated that:**
- a) **The current buildings or structures makes an insufficient positive contribution to the character or appearance of the conservation area; and**
 - b) **A replacement building of equal or greater quality is proposed and planning permission is applied for at the same time.**

Supporting text

- 11.31 The purpose of Policy PLP55 is to conserve or enhance Portsmouth's conservation areas, which make a significant contribution to the unique character of the City
- 11.32 The policy aims to protect them from inappropriate development and, in doing so, the Council will have particular regard to -
- how the proposed development would harmonise with its surroundings;
 - the relationship to historic development patterns; and
 - the impact on any features which make a positive contribution to the character or appearance of the conservation area.
- 11.33 Where relevant, new development should also take account of the need or scope to remove unsightly or inappropriate features.
- 11.34 Conservation Area Appraisals should also be referred to and taken into consideration when reviewing any potential development proposals that fall within a designated Conservation Area; they provide an in-depth overview into the character of an area, as well as providing suggested guidelines for development. An understanding of such would also be beneficial when preparing design codes.

Archaeology

- 11.35 Archaeological sites are finite, irreplaceable, and fragile resources which are vulnerable to damage, either from specific works or from gradual degradation over time.

Development Management Policy PLP56: Archaeology

1. Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting. Where the site includes, or has the potential to include, heritage assets with archaeological interest, sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance. Field evaluation may also be needed.
2. There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets of equivalent significance.
3. Development proposals that would result in unavoidable harm to, or loss of, an archaeological heritage asset's significance, will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, in the case of substantial harm/ loss, also meet the following requirements:
 - a) There is no less harmful viable option; and
 - b) The amount of harm has been reduced to the minimum possible.

In these cases, preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required.

4. The city's archaeological ALERT layers should be used to identify sites where unrecorded archaeology may be present and research such as a desk-based assessment should be carried out. This would include consulting the City's HER and other historical sources.

In those cases where archaeological intervention and recording is considered appropriate to take place the resulting archive should be deposited with Portsmouth Museum and a copy of the report with the City's HER.

Supporting text

- 11.36 The purpose of Policy PLP56 is to set out more detailed criteria for development proposals affecting heritage assets of archaeological interest.
- 11.37 When considering archaeological resources, the Authority will seek advice from a qualified planning archaeologist for that purpose.
- 11.38 The most significant known archaeological heritage assets are usually designated as scheduled monuments and are of national or international importance. It is widely recognised that there are sites which have an equal significance, but which are non-designated heritage assets. If the significance of such sites has been demonstrated, they will be treated in the same way as scheduled monuments. In addition, there are many other archaeological sites which do not have such a great significance but which form a valuable part of the City's historic environment. These may also be referred to as non-designated heritage assets. The City's HER is the definitive record of all known archaeology, including such sites. The nature of the archaeological record also means

that there are many sites of which nothing is presently known, which may be revealed during development works.

- 11.39 Planning decisions will take account of the significance of remains. Development proposals potentially affecting known or suspected archaeological resources will be required to include a Heritage Statement.
- 11.40 Preservation of archaeological assets in situ is the preferred position. In respect of scheduled monuments or non-designated heritage assets of equivalent significance, the preservation of archaeological remains in situ and undisturbed will usually be required. In some cases this can be achieved by avoiding sensitive areas. It should be noted that development which affects a scheduled monument and its setting will require permission from the Secretary of State. Historic England should be notified where Scheduled Monument Consent is required in addition to planning permission. Pre-application engagement with Historic England is also encouraged for all proposals that are likely to affect the significance of a Scheduled Monument.
- 11.41 If a development cannot preserve archaeological assets in situ a Written Scheme of Investigation should be produced in accordance with the professional standards of the Chartered Institute for Archaeologists in order to identify any mitigating measures. A programme of recording should then be carried out in accordance with the Written Scheme of Investigation and the resulting archive should be deposited with Portsmouth Museum and a copy of the report with the City's HER to be made publicly available.
- 11.42 Any projects where significant archaeological interest has been established, such as projects involving major infrastructure, and/or within areas of known archaeological potential will require a programme of archaeological work. The details must be set out in the Written Scheme of Investigation. This must provide for the deposition of the record created by any investigation or recording in the City's HER and deposition of the archive with Portsmouth Museum.

Chapter 12: Monitoring

- 12.1 The Local Plan is subject to regular monitoring over the plan period through the use of targets and indicators. This will assess its impact and whether or not the delivery of its vision and objectives are being achieved. The targets and indicators will be reported on once a year in the Authority Monitoring Report (AMR).
- 12.2 Table 12.1 sets out the Local Plan policies and the targets they seek to achieve. In order to monitor whether or not these targets are being met, indicators are used to assess each policy's yearly performance. This information will be gathered using an array of methods and will be reliant upon a number of stakeholders and bodies to provide key data. Careful consideration has been taken when formulating these indicators to ensure that they are specific, measurable, achievable, relevant, and time-bound (SMART) and can therefore be monitored on a yearly basis.
- 12.3 Monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Beyond this, further indicators which relate to locally important issues have also been applied to policies. These include indicators relating to design, to ensure all developments are of the highest quality; indicators related to retention and delivery of necessary employment floorspace; indicators on flooding, in order to continually assess the level of flood risk across the City and indicators to monitor the level of green infrastructure being delivered across the City. These have been considered to be important to monitor to provide the local community and other stakeholders with yearly updates. Not all policies within the Local Plan are assigned monitoring indicators. This is largely due to there being no appropriate monitoring indicators that can be assigned to these policies to measure their performance.
- 12.4 The final column of Table 12.1 sets out the delivery partners for each policy, as well as the trigger points and actions to be taken if a policy is not delivering to target.
- 12.5 The outcome of this yearly monitoring will inform the review of this Local Plan in due course.

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|---|---|---|--|
| PLP1 Design | Ensuring all new development in the City achieves a high standard and quality of design and place-making that supports beauty | Critical evaluation using the 'Building for Life' assessment framework or a similar range of Urban Design criteria at the post occupation stage. This would be of a selection of implemented schemes - across a range of application types/ scales - householder, minor, majors. | PCC will work with developers, the Agents' Forum and the Design Review Panel |
| PLP2 Climate Emergency | | See <i>detailed climate emergency policies</i> | |
| PLP3 Tipner West & Horsea Island East | <p>Sea defences, land decontamination and land raising/servicing to be completed prior to the commencement of development between 2025-30</p> <p>58,000 m² marine employment floorspace delivered between 2035-40 with some likely to come forward beyond the plan period</p> <p>400 homes completed between 2025-35</p> <p>414-850 homes completed between 2035-40 with some likely to come forward beyond the plan period</p> <p>New bridge delivered between 2025-40</p> <p>Local shop and community facilities completed between 2030-35</p> | <p>Outline & reserved matter permissions granted for net additional homes and commercial floorspace</p> <p>Net additional homes and commercial floorspace (m²) completed</p> | <p>Development is unlikely to be able to proceed without prior delivery of the compensatory habitat and critical enabling works, notably site decontamination and flood defences.</p> <p>If not delivered in line with approved Site Wide Phasing Strategy and condition/legal agreement secured via TWAO.</p> <p>Development is unlikely to be able to proceed without prior delivery of the compensatory habitat</p> <p>They should be delivered before the occupation of the first home</p> |
| PLP4 Tipner East | <p>Enabling works & sea defence wall completed by 2024.</p> <p>431 homes completed between 2025-30</p> <p>625 homes completed between 2030-35</p> <p>716 m² of commercial floorspace delivered between 2030-35</p> <p>840 m² ancillary commercial uses delivered at the transport hub between 2030-35</p> <p>Phase 1 of transport hub delivered by 2030</p> <p>Phase 2 of transport hub delivered by 2035</p> | <p>Outline & reserved matter permissions granted for net additional homes and commercial floorspace</p> <p>Number of net additional homes and commercial floorspace (m²) completed</p> <p>Reserved matters permitted for the Transport Hub; phased completion of the Transport Hub</p> | <p>Underway</p> <p>Reserved matters application needs to be permitted by June 2025 to keep extant permission</p> |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|---|---|---|--|
| PLP5 Lakeside | 50,000 m ² of office floorspace completed by 2040 | Outline & reserved matter permissions granted Amount of new office floorspace completed per annum | If lack of interest is demonstrated in new office floorspace through a robust marketing campaign then other commercial uses will be allowed |
| PLP6 Portsmouth City Centre | 20,000 m ² (1,546 m ² net) of Office floorspace completed between 2030-40 1,721 homes completed 2030 2,437 homes completed between 2030-2040 Provision of supporting infrastructure including but not limited to street scene improvements, new open space at City Centre North and improved provision for the market | Outline & reserved matter permissions granted Number of net additional homes and commercial floorspace m ² completed Overview of development within the City Centre, including regard to delivery milestones arising from targets identified in any relevant masterplan(s) | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |
| PLP7 Fratton Park & the Pompey Centre | Delivery of 710 homes between 2030-2040 with some likely to come forward beyond the plan period Expansion to the north stand of Fratton Park Football Stadium to increase the capacity from 21,000 to between 26,000 and 30,000 between 2035-40 Off road pedestrian/cycle route from Fratton Station delivered prior to occupation of homes and opening of the Fratton Park expansion. Delivery of associated hotel and mixed conference and event facilities, open for business when the Fratton Park Stadium expansion opens Ground floor active uses open for business when the first homes and business premises are occupied | Outline & reserved matter permissions granted; Number of net additional homes completed Ground floor active floorspace completed (m ²) Delivery of an off road route from Fratton Station | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |
| PLP8 St James' & Langstone Campus | Delivery of 209 homes between 2025-30 (application 20/00204/FUL) Delivery of 88 homes between 2025-30 Delivery of 120 homes between 2030-35 | Outline & reserved matter permissions granted Number of net additional homes completed | Development progress will be monitored through the AMR. If there is a lack of progress further work will be undertaken to ascertain the reason and propose interventions |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|--|--|---|---|
| <p>PLP9</p> <p>Horsea Island Open Space</p> | <p>Creation of new 64 hectares of public open space with potential for public access after 2030</p> | <p>Outline & reserved matter permissions granted as necessary</p> <p>Delivery of public access to the new open space post 2030</p> | <p>By 2027, if the site is not anticipated to be ready to be opened for public access in 2030 further assessment will be needed by PCC / Veolia to determine the measures needed to expediate access.</p> <p>By 2030, contact the landowner if planning applications for the site have not been forthcoming</p> |
| <p>PLP10</p> <p>Land west of Portsdown Technology Park</p> | <p>Delivery of 12,500 m² of R&D/B2 floorspace by 2030</p> | <p>Outline & reserved matter permissions granted</p> <p>Amount of commercial floorspace permitted and completed by use class</p> | <p>Ongoing liaison with site developer to understand delivery timescales more precisely.</p> |
| <p>PLP11</p> <p>Port Solent</p> | <p>Flood defence improvements prior to occupation of homes</p> <p>Delivery of 500 homes and marine uses between 2035-40 with some likely to come forward beyond the plan period</p> <p>Improved access for sustainable transport modes from and to the A27 by 2040</p> | <p>Outline & reserved matter permissions granted</p> <p>Number of net additional homes completed and occupied m² marine floorspace completed</p> <p>Access improvements associated with residential development at Port Solent</p> | |
| <p>PLP12</p> <p>St John's College</p> | <p>Delivery of 212 homes between 2030-35</p> | <p>Outline & reserved matter permissions granted</p> <p>Number of net additional homes and m² commercial floorspace completed.</p> | <p>Ongoing liaison with The developer and close cooperation to identify potential sources of delay and deliver timescales more precisely.</p> |
| <p>PLP13</p> <p>Fraser Range</p> | <p>Delivery of new seawall flood defences and related extension to coastal path between 2025-30</p> <p>Delivery of main access road improvements between 2025-30</p> <p>Delivery of first 40 (of 134) new homes and related landscaping between 2025-30</p> <p>Delivery of remaining 94 (of 134) new homes and related landscaping between 2030-35</p> | <p>Outline & reserved matter permissions granted</p> <p>Progress towards delivery of sea defence and coastal path</p> <p>Delivery of associated infrastructure</p> | <p>Ongoing liaison with site developer to understand delivery timescales more precisely.</p> |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|----------------------------------|---|--|---|
| PLP14 The News Centre | Delivery of an electric bus depot Delivery of 100 new homes between 2030 and 2035 | Outline & reserved matter permissions granted for electric bus depot and net additional homes Completion of electric bus depot, and net additional homes | By 2028, contact the landowner if a planning application for this element of the site has not been forthcoming. By 2032, contact the landowner if a planning application for this element of the site has not been forthcoming |
| PLP15 Somers Orchard | Delivery of 565 homes between 2030-35 Delivery of 353 affordable homes between 2030-35 | Outline & reserved matter permissions granted for net additional homes Percentage of affordable housing as per strategic site policy requirement | Ongoing liaison with The developer / The City Council's Housing Revenue Account team. |
| PLP16 Housing Target | At least 680 new homes delivered in the City every year | Number of net additional homes with extant permission Number of net additional homes completed Summary of delivery milestones for strategic sites and allocations arising from targets identified in relevant policies Five year supply and looking forward to the remainder of the plan period | Housing Delivery Test consequences including the tilted balance and implementing the Housing Delivery Test Action Plan |
| PLP17 Affordable Homes | Delivery of 30% affordable homes on sites across the City | Annual monitoring of number and percentage of net additional affordable homes permitted and completed on sites across the City | Under delivery of affordable housing would be flagged in the AMR. Partners are the PCC Housing Revenue Account team and registered social landlords |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|---|---|--|---|
| <p>PLP18</p> <p>Housing mix</p> | <p>Ensuring new development for the following types/groups are policy compliant in terms of mix:</p> <ul style="list-style-type: none"> • Market homes • Affordable home ownership • General need affordable rented • Older persons affordable rented <p>Ensuring enough homes are built to accessible or adaptable standards, in compliance with the policy</p> | <p>Annual monitoring of housing types, sizes and tenure of housing and specialist housing permissions and completions</p> | |
| <p>PLP19</p> <p>Housing for Specific Groups</p> | <p>Ensuring new development for the following types/groups are policy compliant, including with the Local Plan as a whole:</p> <ul style="list-style-type: none"> • Self-build and custom-build • Older persons' housing • Specialist and supported housing • Purpose-built student accommodation • Build to Rent homes • Communal or co-living homes • Service personnel and service family accommodation | <p>Annual monitoring of housing types, sizes and tenure of housing and specialist housing completions</p> | <p>Under delivery of affordable housing would be flagged in the AMR.</p> <p>Partners are the PCC Housing Revenue Account and registered social landlords</p> |
| <p>PLP20</p> <p>Houses in Multiple Occupation</p> | <p>Ensuring new HMOs are policy compliant, with regard to percentage of residential properties in an area (Ward, for monitoring purposes)</p> | <p>Annual monitoring of number of HMOs permitted and refused by Ward. Capture C3 to C4 as well as C3 and C4 to sui generis</p> | <p>Working with the Licensing team at PCC to ensure that new HMOs are meeting acceptable standards</p> |
| <p>PLP21</p> <p>Residential Density</p> | <p>Ensuring sites are optimised in terms of residential density, having regard to the minimum density targets for location contained in the policy</p> | <p>Monitoring of residential density received from HCC by residential density zone</p> | <p>Building at appropriate densities to make an efficient use of land is necessary to meet the housing target set in Policy PLP16. Therefore the Housing Delivery Test consequences including the tilted balance and implementing the Housing Delivery Test Action Plan are relevant to the implementation of this policy</p> |
| <p>PLP22</p> <p>Space Standards</p> | <p>Ensuring that new development meets nationally described space standards for internal floorspace.</p> | <p>Number of applications not meeting nationally described space standards for internal floorspace.</p> | <p>Liaison with PCC Development Management (DM)</p> |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|--|---|--|--|
| PLP23 Estate Renewal | Ensuring sustainable estate renewal of PCC owned and managed assets in the City | Overview of development within the Estate Renewal Areas, including success on delivery milestones arising from targets identified in any relevant masterplan(s) | Liaison with PCC Estates Team |
| PLP24 Gypsies, Travellers & Travelling Showpeople | Delivery of pitches or sites for gypsies and travellers in accordance with the latest identified need and criteria based policy | Number of new permanent or temporary pitches permitted and completed, and number of enforcement cases. | Liaison with PCC Community Safety team |
| PLP25 Employment Target | Targets: • Office 58,645 • R&D 15,270 • B2/B8 64,514 | Amount of floorspace delivered by use class | Liaison with PCC Economic Growth & Skills team |
| PLP26 Safeguarding Employment Land | No net loss of existing or allocated employment floorspace that is fit for purpose | Amount of floorspace lost by use class both through permitted schemes and permitted development rights | Liaison with PCC Economic Growth & Skills team |
| PLP27 Employability & Skills | ESPs agreed for each permission for >30 homes and/or 1000 m ² commercial floorspace ESPs delivered for each completion of >30 homes and/or 1000 m ² commercial floorspace | Number of ESPs completed per year for homes constructed and commercial premises developed | Liaison with PCC Economic Growth & Skills team |
| PLP28 Town Centres | Delivery of growth and annual appraisal of change of main town centre uses across the City Centre, and its Core Commercial Areas. As above for Town, District, Local and Neighbourhood centres, to be monitored as appropriate (e.g. every 2-3 years). | Net change in floorspace permitted and completed for Use Class E Commercial Business and Service (a)(b)(c) and Use Class F1 Learning and non-residential institutions within designated centre boundaries (for all centres, annual monitoring). Percentage of above uses within the City Centre as a whole, and within its Core Commercial Areas (annual monitoring). Percentage of above uses within each Town, District, Local and Neighbourhood Centre, as appropriate (e.g. every 2-3 years). Vacancy rates within the City Centre, and in their Core Commercial Area (annual monitoring). Vacancy rates will be monitored in the Town, District, Local and Neighbourhood Centres as appropriate e.g. every 2-3 years. | Liaison with PCC Town Centre Manager |
| PLP30 Cultural and Visitor Economy | Growth of cultural and visitor economy uses to maximise economic diversity and drive culture-led regeneration | Update on new development of cultural and visitor economy uses, and visitor numbers in the City. | Liaison with PCC Culture team |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|--|--|--|--|
| PLP31 Flooding | Reduction in the impact and extent of all types of flooding | Progress on flood defence projects within the City Number of homes and/or businesses at reduced risk from flooding following the delivery of flood defences. Developments granted planning permission contrary to the advice of the EA in Flood Risk Zones 2 and 3 | Partners: Coastal Partners / Environment Agency / PCC Lead Local Flood Authority Trigger: Any development granted planning permission in flood zones contrary to the advice of the EA |
| PLP33 Sustainable Construction and Onsite Renewable Energy | All development to meet latest water efficiency standard. | Development meeting 110 litres per person water efficiency standard or latest equivalent. | Following on from the WMS that forbids local plans from exceeding energy efficiency standards set in Building Regulations, carefully monitor any changes to the Building Regulations |
| PLP34 Renewable Energy | Increase in the number of renewable energy schemes in the City | Number of renewable energy schemes permitted and completed | |
| PLP36 Coastal Zone | Conserve and enhance the character of the Coastal Zone area | Number of schemes permitted and completed within the Coastal Zone that are policy compliant. | Partners: Coastal Partners / Environment Agency / PCC Lead Local Flood Authority Trigger: Any development granted planning permission in flood zones contrary to the advice of the EA |
| PLP35 Air quality & Pollution | Improve the City's air quality | Report on Key indicators from the Air Quality Annual Status Report including for example data on: <ul style="list-style-type: none"> • Vehicles subject to the Clean Air Zone (CAZ); • Pollution levels at monitoring points; and • Changes in quality at AQMA's | Future reviews of the CAZ Liaison with PCC Public Health and Transport teams |
| PLP38 Green Infrastructure | Create and enhance the green grid in the City | Number of major permissions that positively contribute to the green grid. Number of major permissions that negatively impact the green grid. Contributions from Major developments towards green infrastructure | Liaison with PCC Greening the City and Transport teams |
| PLP39 Biodiversity | Protection and enhancement of National Nature Conservation designations | Condition of SSSI/protected habitats: favourable, unfavourable, unfavourable recovering (as per HBIC) | Partners: HCC Habitat and Biodiversity Information Centre, PCC Parks team and the Hampshire & Isle of Wight Wildlife Trust |
| PLP40 Biodiversity Net Gain | Uplift in total biodiversity in the City Development schemes providing onsite / offsite BNG | Number of applications achieving on site BNG of 10% or more both onsite / offsite | Partners: PFSH Strategic Environmental Protection Officer (SEPO) |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|--|--|---|---|
| PLP41 Trees & Hedgerows | No loss of protected trees without replacement | Planning applications granted for loss of Tree Preservation Order (TPO) trees without replacement | Liaison with PCC Tree Officer |
| PLP42 Solent Waders & Brent Geese Sites | Protect supporting habitat for Waders and Brent Geese | Development permitted directly and indirectly impacting on these sites and mitigation provided. Development refused due to impact upon supporting habitat | Partner: Bird Aware Solent |
| PLP43 Recreational Disturbance on International Nature Designations | Effectiveness of the Solent Recreation Mitigation Strategy. Number of schemes contributing to the Solent Recreation Mitigation Strategy | Total contributions to Bird Aware | Partner: Bird Aware Solent |
| PLP44 Nutrient Neutrality in International Nature Designations | Ensuring development does not negatively contribute to nitrification in the Solent | Number of Schemes securing nutrient neutrality mitigation Amount of nutrients secured by LPA in Kg/TN/yr | Partners: PISH SEPO, PCC Housing Revenue Account team, the Hampshire & Isle of Wight Wildlife Trust and the PCC CIL team |
| PLP45 Open Space | Open space secured as part of new development | Net amount of open space secured as part of new development (hectares) above the policy threshold Financial contributions for qualitative improvements | Liaison with PCC Parks team |
| PLP46 Local Green Spaces | Protect and enhance Local Green Spaces | Number of development proposals permitted that relate to either the improvement or loss of Local Green Spaces | Liaison with PCC Parks team |
| PLP47 Movement and Transport | To deliver development that minimises the need to travel and maximises the availability of relevant sustainable transport options, so that growth in private vehicle use is kept to a minimum | Developments granted planning permission for transport infrastructure Progress towards delivery of attractive, inclusive, safe and accessible walking and cycling routes across the City (LTP4 Policy G). Progress towards delivery of strategic transport improvements identified within the Strategic Transport Assessment. | Partners: PCC highways authority / National Highways / Network Rail / Triggers: No mitigation secured at strategic development sites that require measures, as set out within the Strategic Transport Assessment. No CIL funds spent on transport improvements by 2030 No gross increase in non-motorised transport routes by 2030 |
| PLP48 Access and Parking | Make efficient use of land in Portsmouth and provide appropriate vehicle, bicycle and alternative parking (e.g. scooters) in terms of amount, design and layout for residential and non-residential developments | Delivery of new Portsmouth's Parking Strategy Delivery of Portsmouth's new Parking Standards and Transport Assessment SPD. Progress towards delivery of shared transport modes (LTP4 Policy C). | Partners: PCC Highways Authority Triggers: Parking Strategy not adopted by 2025 / Parking Standards SPD not adopted by 2026 |

| Policy | Targets | Indicators | Partners, delivery mechanisms, triggers and actions required if policy not being achieved. |
|--------|--|--|---|
| PLP49 | | Delivery of cycle parking facilities and associated infrastructure (LTP4 Policy G). | |
| PLP50 | To undertake effective placemaking to deliver multifunctional public realms across the City | Number of public realm, cultural and public art projects secured by s106 agreement and planning condition | |
| PLP51 | All development is supported by infrastructure as far as necessary to mitigate its impact | Total CIL monies gathered Progress towards delivery of critical infrastructure projects as identified within the IDP | Partners: Infrastructure providers and the PCC CIL team |
| PLP52 | Provide infrastructure to ensure all new developments are served by superfast broadband, full fibre connections or equivalent. Removal, reduction in prominence and undergrounding of telecommunications/ utilities infrastructure where feasible | Increase in coverage of superfast broadband and full fibre connections | Partners: PCC / Telecommunications and utility companies Triggers: No expansion of coverage by 2030 |
| PLP55 | Protect and enhance the provision of community facilities to meet the everyday needs of local communities | Number of permissions and completions for new community facility floorspace Amount of community facility floorspace lost Progress on the delivery of key community facilities set out in Portsmouth's Corporate Plan (2023/24) | Partners: PCC / Developers Triggers: No new community facilities delivered at strategic sites where the requirement is set out in Policy. Loss of community facilities through Change of Use 1 development of this type in 3 consecutive years or 3 such developments in 1 year |
| PLP55 | Review and update as necessary one of the existing Conservation Area Appraisal and Guideline Documents per annum. | Progression/ completion of review of one (1) of the Council's existing Conservation Area and Appraisal Documents by December. | |

Table 12.1: Local Plan Monitoring

Appendix 1: List of Policies to be superseded by the Portsmouth Local Plan

Portsmouth City Local Plan 2001-2011

| Saved Policy superseded | Portsmouth Local Plan Policy |
|--|--|
| DC21: Contaminated Land | PLP37: Contaminated Land |
| DC26: Access onto Primary and Distributor Roads | PLP48: Access & Parking |
| DC31: Employment Sites outside the Primary Area | PLP26: Safeguarding Employment Land |
| DC44: Housing Revival Areas | PLP28: Town Centres, PLP16: Housing Target |
| DC45: Loss of Housing | PLP16: Housing Target |
| BF1: Land South of Burrfields Road | PLP52: New & Existing Community & Leisure Facilities |
| CS1: Goldsmith Infant School | PLP52: New & Existing Community & Leisure Facilities, PLP49: Public Realm |
| CS2: Goldsmith Avenue/Fawcett Road Urban Priority Area | Implemented |
| CD10: Alder's Warehouse | Implemented |
| CD14: Improved Access to Trafalgar Gate | PLP47: Movement & Transport |
| CP1: Brynwell Builder's Yard, Copnor Road | PLP16: Housing Target |
| CM1: Land East of the Marriott Hotel | PLP47: Movement & Transport |
| CM4: Cosham Transport Interchange | Implemented |
| CM6: Queen Alexandra Hospital | PLP52: New & Existing Community & Leisure Facilities |
| CM7: A27 Cycleway | PLP47: Movement & Transport |
| CM8: Portsdown Hill | PLP45: Open Space, PLP39: Biodiversity, PLP46: Local Green Spaces |
| DF2: 109b and 111-113 Havant Road | PLP16: Housing Target |
| EC1: Langstone Harbour Coastal Path | PLP39: Biodiversity, PLP38: Open Space |
| HS3: Land West of Peronne Road | Implemented |
| HS4: Museums Store, Copnor Road | PLP16: Housing Target, PLP52: New & Existing Community & Leisure Facilities |
| HS5: Hilsea Lido | PLP45: Open Space, PLP52: New & Existing Community & Leisure Facilities |
| MT1: St. Mary's Hospital (West) | Implemented |
| MT2: Land South of St. James' Hospital | PLP8 St James' & Langstone Campus, PLP45: Open Space |
| MT3: Land at St James' Hospital | PLP8 St James' & Langstone Campus |
| MT4: St. James' Hospital (Main Building) | PLP8 St James' & Langstone Campus, PLP54: Listed Buildings |
| MT5: Land North of Goldsmith Avenue | PLP25: Employment Target |
| MT7: Land North of Milton Park Infant/Junior School | PLP52: New & Existing Community & Leisure Facilities |
| NL2: Waterside School | PLP52: New & Existing Community & Leisure Facilities |
| PG3: Land at Marsden Road | PLP16: Housing Target, PLP52: New & Existing Community & Leisure Facilities, PLP47: Movement & Transport |
| SJ1: Land North of Clarence Parade | PLP16: Housing Target |
| SJ3: Southsea Skate Park | PLP46: Local Green Spaces |
| SJ8: Land to the West of Exmouth Road | PLP16: Housing Target |

| | |
|---|-----------------------|
| SJ9: Land at the Corner of Exmouth Road and St Vincent Road | PLP16: Housing Target |
| ST2: Ravelin Park | Implemented |
| PH1: Portsmouth Harbour Coastal Zone | PLP36: Coastal Zone |
| LH1: Langstone Harbour Open Coastal Area | PLP36: Coastal Zone |
| LH2: Langstone Harbour Coastal Zone | PLP36: Coastal Zone |

The Portsmouth Plan (Portsmouth's Core Strategy) 2012

| Existing Policy superseded | Portsmouth Local Plan Policy |
|--|---|
| PCS1: Tipner | PLP3: Tipner West & Horsea Island East, PLP4: Tipner East |
| PCS2: Port Solent | PLP11: Port Solent |
| PCS3: Horsea Island | PLP3: Tipner West & Horsea Island East, PLP9: Horsea Island Open Space |
| PCS4: Portsmouth City Centre | PLP6: Portsmouth City Centre |
| PCS5: Lakeside Business Park | PLP5: Lakeside North Harbour |
| PCS6: Somerstown and North Southsea | PLP23: Estate Renewal, PLP15: Somers Orchard |
| PCS7: Fratton Park & the South Side of Rodney Park | PLP7: Fratton Park & the Pompey Centre |
| PCS8: District Centres | PLP28: Town Centres |
| PCS9: The Seafront | PLP36: Coastal Zone |
| PCS10: Housing Delivery | PLP16: Housing Target |
| PCS11: Employment Land | PLP25: Employment Target |
| PCS12: Flood Risk | PLP31: Flooding |
| PCS13: A Greener Portsmouth | PLP38: Green Infrastructure, PLP39: Biodiversity |
| PCS14: A Healthy City | PLP35: Air Quality & Pollution, PLP45: Open Space, PLP47: Movement & Transport, PLP49: Public Realm, PLP52: New & Existing Community & Leisure Facilities |
| PCS15: Sustainable Design and Construction | PLP33: Sustainable Construction and Onsite Renewable Energy |
| PCS16: Infrastructure and Community Benefit | PLP50: Infrastructure Delivery, PLP51: Electronic Communication & Utilities Infrastructure, PLP27: Employability & Skills |
| PCS17: Transport | PLP47: Movement & Transport |
| PCS18: Local Shops and Services | PLP29: Small Local Shops |
| PCS19: Housing Mix, Size and the Provision of Affordable Homes | PLP17: Affordable Homes, PLP18: Housing Mix, PLP19: Housing for Specific Groups, PLP22: Space Standards |
| PCS20: Houses in Multiple Occupation (HMOs): ensuring mixed and balanced communities | PLP20: Houses in Multiple Occupation |
| PCS21: Housing Density | PLP21: Residential Density |
| PCS22: Gypsy, Traveller & Travelling Showpeople Accommodation | PLP24: Gypsies, Travellers & Travelling Showpeople |
| PCS23: Design and Conservation | PLP1: Design, PLP53: Historic Environment |
| PCS24: Tall Buildings | PLP1: Design |

Somerstown and North Southsea Area Action Plan (AAP) 2012

| Policy superseded | Portsmouth Local Plan Policy |
|--|---|
| SNS1: Presumption in favour of Sustainable Development | The Emerging Local Plan |
| SNS2: Comprehensive Change | PLP23: Estate Renewal |
| SNS3: New Routes | PLP49: Public Realm, PLP47: Movement & Transport, PLP48: Access & Parking |
| SNS4: Removal of Winston Churchill Roundabout | PLP47: Movement & Transport |
| SNS5: Community Facilities: Land Use | Implemented |
| SNS6: Local Centre | PLP28: Town Centres |
| SNS7: Residential Development | PLP23: Estate Renewal, PLP18: Housing Mix, PLP19: Housing for Specific Groups |
| SNS8: Employment | PLP25: Employment Target |
| SNS9: Public Open Space: Allocations | PLP45: Open Space |
| SNS10: Development on Existing Open Space | PLP45: Open Space |
| SNS11: General Design Principles | PLP1: Design |

Southsea Town Centre Area Action Plan (AAP) 2007

| Policy superseded | Portsmouth Local Plan Policy |
|---|---|
| STC1: Sustainable Construction & Design | PLP33: Sustainable Construction and Onsite Renewable Energy |
| STC2: Southsea Town Centre | PLP28: Town Centres |
| STC3: Southsea Primary Frontage | PLP28: Town Centres |
| STC4: Restaurants & Café | PLP28: Town Centres |
| STC5: Drinking Establishments & Hot Food Take-aways | PLP28: Town Centres, PLP30: Cultural and Visitor Economy |
| STC6: Markets & Events | PLP30: Cultural and Visitor Economy, PLP28: Town Centres |
| STC7: Access | PLP47: Movement & Transport PLP48: Access & Parking |
| STC8: Taxi Ranks | PLP47: Movement & Transport |
| STC9: Ashby Place Car Park | PLP28: Town Centres, PLP48: Access & Parking |
| STC10: Design | PLP1: Design |
| STC11: Shop Fronts | PLP28: Town Centres, PLP29: Small Local Shops |
| STC12: Environmental Improvements | PLP28: Town Centres, PLP49: Public Realm |
| STC13: Palmerston Road Precinct | PLP49: Public Realm, PLP1: Design PLP48: Access & Parking |
| STC14: Links | PLP49: Public Realm, PLP1: Design |
| STC15: Knight & Lee, Palmerston Road | PLP28: Town Centres, PLP16 Housing Target |
| STC16: Grosvenor Casino, Osborne Road | PLP28: Town Centres, PLP52: New & Existing Community & Leisure Facilities PLP16 Housing Target |
| STC17: 14-18 Osborne Road | PLP28: Town Centres PLP16: Housing Target |

Appendix 2: Identified small/medium sites of less than one hectare with capacity for five or more dwellings

| HELAA 2023 Site ref. | Site Name | Area (ha) | 0-5 years | 6-10 years | 11-15 years | >15 years | Total net dwellings |
|----------------------|---|-----------|-----------|------------|-------------|-----------|---------------------|
| BA01 | Coniston Avenue | 0.28 | 0 | 11 | 0 | 0 | 11 |
| BA02 | West of Milton Road | 0.47 | 0 | 0 | 20 | 0 | 20 |
| BA03 | Garages on Kendal Avenue | 0.15 | 0 | 0 | 10 | 0 | 10 |
| CD02 | Car Park, Crasswell Street | 0.03 | 0 | 5 | 0 | 0 | 5 |
| CD04 | The Invincible, Wickham Street | 0.03 | 42 | 0 | 0 | 0 | 42 |
| CD05 | Car Park, College St | 0.16 | 0 | 0 | 60 | 0 | 60 |
| CD06 | Rosemary Lane, Garages | 0.04 | 0 | 0 | 20 | 0 | 20 |
| CD07 | Bridge Centre, Fratton | 0.38 | 0 | 115 | 0 | 0 | 115 |
| CD10 | Maxstoke Close Car Park | 0.12 | 0 | 5 | 0 | 0 | 5 |
| CD11 | 27 - 29 Kingston Road | 0.03 | 7 | 0 | 0 | 0 | 7 |
| CD15 | Hertford Place | 0.16 | 0 | 17 | 0 | 0 | 17 |
| CD20 | Durham Street | 0.42 | 0 | 0 | 50 | 0 | 50 |
| CD21 | Port Royal Street Industrial Area, East of Somers Road | 0.17 | 0 | 0 | 20 | 0 | 20 |
| CD29 | 28-42 Lake Road | 0.08 | 0 | 40 | 0 | 0 | 40 |
| CD65 | 117-127 Fratton Road | 0.18 | 0 | 30 | 0 | 0 | 30 |
| CD73 | Maitland Street | 0.20 | 0 | 5 | 0 | 0 | 5 |
| CD75 | Venture Tower Fratton Road | 0.09 | 0 | 38 | 0 | 0 | 38 |
| COP01 | Brynwell Builder's Yard, 207-217 Copnor Road | 0.10 | 20 | 0 | 0 | 0 | 20 |
| COP02 | Green Lane Garages | 0.05 | 0 | 5 | 0 | 0 | 5 |
| COP03 | Copnor Methodist Church | 0.14 | 0 | 15 | 0 | 0 | 15 |
| COS01 | Cosham Health Centre, Vectis Way | 0.33 | 70 | 0 | 0 | 0 | 70 |
| COS02 | Community Centre, Cosham | 0.28 | 0 | 50 | 0 | 0 | 50 |
| COS03 | Westmoors 50 London Road Cosham | 0.07 | 0 | 10 | 0 | 0 | 10 |
| COS04 | Former Cosham Police Station | 0.28 | 0 | 60 | 0 | 0 | 60 |
| COS06 | Cosham Fire Station | 0.17 | 0 | 50 | 0 | 0 | 50 |
| CS01 | 139 - 141 Goldsmith Avenue | 0.07 | 0 | 0 | 12 | 0 | 12 |
| CS02 | 163 Goldsmith Avenue | 0.07 | 0 | 0 | 20 | 0 | 20 |
| CS06 | 227-231 Goldsmith Avenue | 0.09 | 25 | 0 | 0 | 0 | 25 |
| DF02 | Karen Avenue | 0.45 | 0 | 6 | 0 | 0 | 6 |
| EC02B | Land at Halliday Crescent | 0.13 | 0 | 5 | 0 | 0 | 5 |
| EC07 | 4 Waverley Road | 0.12 | 0 | 5 | 0 | 0 | 5 |
| EC08 | 1A Beatrice Road | 0.02 | 5 | 0 | 0 | 0 | 5 |
| EC14 | Eastney Swimming Pool and part of Southsea Leisure Park | 0.88 | 8 | 0 | 0 | 0 | 8 |
| FR02 | Car Sales, Cornwall Road | 0.07 | 0 | 10 | 0 | 0 | 10 |
| FR03 | Nancy Road Car Park | 0.12 | 0 | 5 | 0 | 0 | 5 |
| FR04 | 46- 50 Kingston Road | 0.03 | 11 | 0 | 0 | 0 | 11 |
| FR06 | St Wilfrids Church, 49 George Street | 0.09 | 8 | 0 | 0 | 0 | 8 |
| HI01 | Hilsea Lodge (Highgrove) | 0.48 | 24 | 0 | 0 | 0 | 24 |

| HELAA 2023 Site ref. | Site Name | Area (ha) | 0-5 years | 6-10 years | 11-15 years | >15 years | Total net dwellings |
|----------------------------|---|--------------|--------------|---------------|----------------|--------------|------------------------|
| HI02 | Land of former supermarket, Stubbington Avenue | 0.18 | 0 | 20 | 0 | 0 | 20 |
| HI08 | Museums Store, Copnor Road | 0.27 | 0 | 0 | 10 | 0 | 10 |
| MI03 | 142 Milton Road (former Pickwick Pub) | 0.08 | 12 | 0 | 0 | 0 | 12 |
| MI07 | 185-191 Highland Road | 0.04 | 8 | 0 | 0 | 0 | 8 |
| NE02 | Smeaton Street Garages | 0.02 | 0 | 5 | 0 | 0 | 5 |
| NE03 | Former Police Station, Kingston Crescent | 0.41 | 0 | 60 | 0 | 0 | 60 |
| NE05 | 205 London Road | 0.02 | 0 | 8 | 0 | 0 | 8 |
| NE06 | Blue Anchor PH, 2 London Road | 0.03 | 0 | 6 | 0 | 0 | 6 |
| NE07 | Former Barclays 82 London Road | 0.03 | 9 | 0 | 0 | 0 | 9 |
| NE09 | 98 London Road | 0.18 | 30 | 0 | 0 | 0 | 30 |
| NE20 | 305-307 Twyford Avenue | 0.03 | 6 | 0 | 0 | 0 | 6 |
| NE22 | Land at Heathfield Road | 0.08 | 0 | 15 | 0 | 0 | 15 |
| PA03 | 140 Southampton Road | 0.16 | 0 | 20 | 0 | 0 | 20 |
| PA15 | Land at Bude Close | 0.09 | 0 | 5 | 0 | 0 | 5 |
| SJ02 | 71 -73 Palmerston Road | 0.03 | 6 | 0 | 0 | 0 | 6 |
| SJ04 | 61-63 Marmion Road | 0.06 | 0 | 5 | 0 | 0 | 5 |
| SJ08 | Former Grosvenor Casino, Osborne Road | 0.09 | 0 | 10 | 0 | 0 | 10 |
| SJ12 | 82-88 Clarendon Road | 0.04 | 10 | 0 | 0 | 0 | 10 |
| SJ16 | Wimbledon Park Sports Centre | 0.23 | 0 | 10 | 0 | 0 | 10 |
| ST01 | City Records Office | 0.35 | 0 | 50 | 0 | 0 | 50 |
| ST02 | Middle Street | 0.19 | 163 | 0 | 0 | 0 | 163 |
| ST03 | Open space at Stone Street | 0.28 | 0 | 18 | 0 | 0 | 18 |
| ST04 | Wightlink Car Park | 0.35 | 0 | 0 | 60 | 0 | 60 |
| ST05 | Car Park, Wiltshire Street | 0.07 | 0 | 0 | 50 | 0 | 50 |
| ST07 | Derelict Land, Warwick Crescent | 0.04 | 7 | 0 | 0 | 0 | 7 |
| ST09 | Wellington Street Garages | 0.02 | 0 | 5 | 0 | 0 | 5 |
| ST12 | Cathedral House | 0.07 | 0 | 8 | 0 | 0 | 8 |
| ST14 | 7 Kings Road, Southsea | 0.10 | 0 | 8 | 0 | 0 | 8 |
| | | | | | | | |
| TOTALS | | | 471 | 740 | 332 | 0 | 1,543 |

Appendix 3: Identified sites of more than one hectare with capacity for five or more dwellings

| HELAA 2023 Site ref. | Site Name | Area (ha) | 0-5 years | 6-10 years | 11-15 years | >15 years | Total net dwellings |
|----------------------|----------------------------------|-----------|-----------|------------|-------------|-----------|---------------------|
| CD01 | Wardroom | 2.71 | 0 | 200 | 0 | 0 | 200 |
| DF06 | East Lodge Farm (PCC owned) | 1.25 | 0 | 0 | 25 | 0 | 25 |
| DF07 | Court Lane Yard | 1.88 | 0 | 0 | 70 | 0 | 70 |
| EC11 | Southsea Marina | 4.49 | 0 | 12 | 0 | 0 | 12 |
| PA04 | Beacon View Academy | 1.33 | 0 | 70 | 0 | 0 | 70 |
| PA08 | Land at Marsden Road, Paulsgrove | 1.79 | 0 | 0 | 80 | 0 | 80 |
| | | | | | | | |
| TOTALS | | | 0 | 282 | 175 | 0 | 457 |

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Appendix 4: Marketing Requirements for Change of Use Applications

This appendix is relevant to the following policies, which have marketing requirements for change of use applications:

- Development Management Policy PLP26: Safeguarding Employment Land
- Development Management Policy PLP28: Town Centres
- Development Management Policy PLP29: Small Local Shops
- Development Management Policy PLP52: New & Existing Community & Leisure Facilities

Applicants are encouraged to work on an iterative basis with the Local Planning Authority on their marketing campaigns. They should contact us before starting any marketing work and again once it is finished, but before they submit their application.

For all development proposals that involve the loss of an existing use protected by the above named policies a full and active marketing campaign should have been carried out for the minimum amount of time specified in the relevant policy. The marketing period set for Policies PLP26 to 29 is six months. The marketing period for commercially run community facilities set in Policy PLP52 is 12 months. These time periods are considered reasonable and provide sufficient time to test market demand for the existing use. The marketing period will need to be evidenced by a Marketing Report, which should be submitted along with the planning application. The scale of the Marketing Report should be proportionate with the scale and type of the proposed change of use. Therefore the scale of a Marketing Report for a large employment site located close to the City Centre will be much more onerous than for a small more local employment site. In all cases the marketing process requires as a minimum:

1. Confirmation by the marketing agent on headed company paper or electronic equivalent that the premises were appropriately and extensively marketed for the required length of time as set out by the Council. The marketing period must have ended on a date no more than six months before the date the planning application was submitted.
2. Downloaded and verified evidence of marketing on social media and the internet.
3. Dated photographs of marketing board/s of an appropriate quality, size, scale, location and number, during this time, on the premises.
4. An enquiry log, how it was followed up and why it was unsuccessful.
5. A copy of all advertisements in the local press and trade journals both paper and online.

The premises and/or site should be marketed at a price and associated terms that are commensurate with market values for the existing use, based on evidence from recent and comparable transactions and deals. To demonstrate that the price and terms are appropriate, at least three examples may be requested by the Local Planning Authority of completed transactions involving a similar site or premises and similar terms within the local area, dated within the last twelve months, and written evidence from an independent qualified valuer on the market values in the local area. All information about price and terms should be provided in an accessible format. Where the price changed during the period of the marketing campaign, the reasons for this should be recorded and included in the Marketing Report.

Where premises are marketed for lease, the length of lease offered should not be unduly restrictive and should include the potential for a short term lease in appropriate cases. Details of the lease terms offered should be included in the marketing report, along with any changes made to the terms offered during the period of the marketing campaign and the reasons for this.

Where the flow of enquiries has been limited or is decreasing during the period of marketing, the Marketing Report should explain any measures taken to refresh the marketing campaign.

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Glossary

Accessibility

The ability and level of ease in which people can move around an area and/or reach places and facilities.

Active Resistance Measures (in relation to flood risk)

Measures which are not permanently installed into a property and will require deployment before a flood event, such as a door guard (CIRIA, 2021).

Affordable Housing

This term encapsulates social rented, affordable rented and intermediate housing, which is provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Affordable Rented

A type of rent that is set up at no more than 80% of the local market rent.

Air Quality Management Areas (AQMAs)

Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Amenity

A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.

Ancient or Veteran Tree

A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Article 4 Direction

A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order. They are issued by local planning authorities.

Authority Monitoring Report (AMR)

An annual report that details the progress and effectiveness of a Council's planning policies, as set out in the Local Plan.

Biodiversity

The range and diversity of life in all its forms, including plants, animals and micro-organisms, their habitats and the ecosystems within which they live and interact.

Biodiversity Metric

The biodiversity metric is a tool (published by Natural England) used to calculate how a development, or change in land management, will change the biodiversity value of a site. The metric calculates the values as 'biodiversity units,' using the size, quality and location of the habitat. The Metric will be used for major development from February 2024, with a 'small sites metric' to be used on minor development from April 2024.

Biodiversity Net Gain (BNG)

Biodiversity net gain is a way of contributing to the recovery of nature while developing land, making sure that the habitat for wildlife is in a better state than it was before development occurred. The Environment Act contains a new 10% biodiversity net gain condition for planning permissions, which will become mandatory in November 2023. A 'biodiversity metric' can be used to measure the amount of biodiversity net gain (see above).

Biodiversity Opportunity Areas (BOA)

Extensive areas where improved habitat management, as well as efforts to restore and re-create Priority habitats, will be most effective in enhancing connectivity to benefit recovery of Priority species in a fragmented landscape.

Bird Aware Solent

Bird Aware Solent is the brand name of the Solent Recreation Mitigation Partnership. They are made up of fifteen local councils, Natural England, the Royal Society for the Protection of Birds, Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy. The goal is to raise awareness of the ducks, geese and wading birds that spend the winter on the Solent coastline.

Blue Infrastructure

Networks, or features within a network, which relate to water, including rivers, streams, ponds, lakes and storm water provision.

BREEAM

This stands for the Building Research Establishment's Environmental Assessment Method. This is the preferred way of measuring the environmental sustainability of commercial buildings.

Brownfield Land/Sites

Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.

Build to Rent Homes

Homes developed and built specifically for the rental market.

Clean Air Zone

A clean air zone (CAZ) is an area where targeted action is taken to improve air quality and deliver improved health benefits and support economic growth. CAZs aim to reduce all sources of pollution, including nitrogen dioxide and particulate matter, using a range of measures tailored to the particular location. The Portsmouth Clean Air Zone launched on 29 November 2021. For the Portsmouth CAZ, non-compliant vehicles are older Heavy Goods Vehicles (including some larger motorhomes), buses and coaches, taxis and private hire vehicles. Private cars and vans are not charged in Portsmouth's CAZ.

Climate Change

Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.

Community Infrastructure Levy (CIL)

A non-negotiable planning levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area, to support the delivery of infrastructure needed as a result of development.

Community-led Development

A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed and democratically controlled by its members. It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up.

Community Use Agreement (CUA)

A formal agreement between two parties to make sports facilities (during times when they are not required by the main user) available for the local community.

Conservation (relating to Heritage)

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area

Local authorities have the power to designate conservation areas, which are areas of special architectural and/or historic interest.

Conservation Area (Character) Appraisal

A published document defining the special architectural or historic interest that warranted the area being designated.

Core Commercial Area

The core part of town centres, as defined on the Portsmouth Local Plan Policies Map. Where a diversity of retail, commercial, leisure, culture, civic and service uses are concentrated.

Creative Cluster

An agglomeration of creative businesses and workers that collaborate and compete with each other.

Cultural Regeneration

Opportunity or catalyst for economic growth and regeneration through expansion, support and/or enhancement of creative industries and cultural activity or uses.

Deliverable (in terms of housing)

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Density (in the case of residential)

A measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Design and Access (DAS) statement

A short report that accompanies and supports a planning application. They provide a framework for applicants to explain how a proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users.

Designated Heritage Assets

These assets are Listed Buildings, Conservation Areas, Scheduled Monuments, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and World Heritage Sites.

Design Code

A set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a masterplan or other design and development framework for a site or area.

Developable (in terms of housing)

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Development Plan

A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted Local Plans, neighbourhood plans and the, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

District Centres

A group of shops and some service outlets serving part of an urban area and providing a geographic focus for it, separate from the town centre but with more variety than local centres.

Duty to Cooperate

A legal requirement on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of the Local Plan in the context of strategic cross-boundary issues.

Ecological Impact Assessment (EclA)

The process of identifying, quantifying and evaluating potential effects of development or other proposed actions on habitats, species and ecosystems.

Employment and Skills Plan (ESP)

Employment and Skills Plans set out the type of training and employment opportunities that will be offered through a development. They are prepared by a developer with the help of the council and sometimes other key partners, such as Jobcentre Plus or the Construction Skills Industrial Training Board (CITB).

Enabling Development (in relation to Heritage decision making)

It is development that would not be in compliance with local and/or national planning policies, and would not therefore normally be granted planning permission, except where it contributes to securing viable re-use and conservation of a heritage asset.

Energy micro-generation

The small-scale generation of energy - typically renewable energy - by households, small businesses and communities. For example, solar panels being installed on a property's roof.

Energy (and Climate) Statement

A document which outlines how a proposed development will meet specific local energy efficiency targets.

EnerPhit Standards

It is a slightly relaxed standard for retrofit projects, where existing architecture and/or conservation issues mean that meeting the Passivhaus standard (see below) is not feasible.

Environmental Impact Assessment (EIA)

It is a tool used to assess any likely significance effects of a development proposal on the environment.

Exception Test (in relation to Flood Risk)

The purpose of an exception test is to show how flood risk will be managed on a proposed site. There are two parts to the test that need to be passed:

- Development that has to be in a flood risk area will provide sustainability benefits to the community that outweigh flood risk; and
- The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce food risk overall.

Fabric first

It is an approach to building design which involves maximising the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems. This can help reduce capital and operational costs, improve energy efficiency and reduce carbon emissions, whilst also reducing ongoing maintenance costs.

First Homes

A specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing' for planning purposes. The criteria is that they must be discounted by a minimum of 30% against the market value; sold to a person or persons meeting the First Homes eligibility criteria; on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and, after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).

Flood Risk Assessment (site-specific)

An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

Future Homes Standard (FHS)

It is a standard that, from 2025, will require all new homes to produce 75-80% less carbon emissions than homes built under the current Building Regulations.

Green Corridors

Green corridors link areas of green space within the city. They help to promote environmentally sustainable forms of transport such as walking and cycling within urban areas and can also act as vital linkages for wildlife dispersal between wetlands and the countryside.

Greenfield Site/Land

Land (or a defined site) usually farmland or amenity space, that has not previously been developed.

Green Infrastructure (GI)

Green infrastructure (GI) is defined as a network of multi-functional green space and other green features, both urban and rural, which can deliver quality of life and environmental benefits for communities. It includes parks, open spaces, playing fields, woodlands – and also street trees, allotments, private gardens, green roofs and walls, sustainable drainage systems (SuDS) and soils. It includes rivers, streams, canals and other water bodies, sometimes called 'blue infrastructure.'

Grey Infrastructure

This refers to human-engineered infrastructure, such as roads, pipes, dams, seawalls and drains.

Gross Value Added (GVA)

The contribution made/added to an economy by a producer, sector, industry or region.

Gypsies and Travellers

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Habitat Regulations Assessment (HRA)

An assessment to determine whether or not development proposals are likely to have a significant effect on protected European sites.

Health Impact Assessment (HIA)

It is a tool used to identify the health impacts of a plan or project, and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities.

Heritage Assets

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. This includes both designated (see above) and undesignated heritage assets (see below).

Heritage Statement

An assessment of the significance of any heritage assets and/or their settings affected by a development, and of the impacts of that development upon them.

Historic Environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic Environment Record (HER)

Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

Housing and Economic Development Needs Assessment (HEDNA)

A HEDNA assesses the future development needs for housing (both market and affordable) and employment across a local authority and aids the preparation of emerging local plans.

Housing and Economic Land Availability Assessment (HELAA)

An assessment which identifies a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period. It is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land.

Houses in Multiple Occupation (HMOs)

Shared dwelling houses occupied by between three to six unrelated people who share basic amenities such as a kitchen and/or bathroom. In terms of planning 'use classes,' these are defined as use class C4. HMOs occupied by more than six people are 'sui generis' in planning terms.

Hydrogeological Risk Assessment (alternatively known as a 'Basement Impact Assessment')

An assessment that reviews proposed development below ground level and its potential impacts on surface water and groundwater flow levels.

Imperative Reasons for Overriding Public Interest (IROPI)

If it is established that there are no feasible alternative solutions for a project or plan, the competent authority must be able to identify "imperative reasons of overriding public interest" (IROPI) that justify the plan or project despite the environmental damage it will cause, under Article 6(4).

Index of Multiple Deprivation (IMD)

It is the official measure of relative deprivation for small areas (Lower Super Output Areas) in England, based on six domains: income, employment, health deprivation and disability, education skills and training, housing, and geographical access to services.

Infrastructure

The fundamental services and facilities that an area needs, for example, electricity, sewerage, drainage, water supply, roads, education, social and health facilities.

Infrastructure Delivery Plan (IDP)

The IDP forms part of the evidence base for the Local Plan. It assesses the infrastructure capacity and needs of the City and provides an overview of the way infrastructure is planned and the organisations involved in its delivery. It also looks at costs and likely funding

mechanisms for infrastructure and forms the bases for assessing contributions that would be sought to meet the needs for new development.

Landscape

As defined by the Council of the Europe Landscape Convention, Landscape means "an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It can represent an array of arbitrary and non-arbitrary factors, such as, but not limited to:

- The visible features of an area of land (flora and fauna, topographic features and land use)
- sights, sounds, touch and smells
- cultural associations, history and memories

Landscape Scale

As defined in The Natural Choice, Natural Environment White Paper (2011), landscape scale is a "term commonly used to refer to action that covers a large spatial scale, usually addressing a range of ecosystem processes, conservation objectives and land uses."

Legibility

The quality of a place being understood, easily navigated by its users and easy for visitors to orient themselves in. It is an urban design concept and an element which contributes to the image of a place.

Local Centres

A small group of shops and perhaps limited-service outlets of a local nature (for example, a suburban housing estate) serving a small catchment area. Sometimes also referred to as a local neighbourhood centre.

Local Green Space (LGS)

A designation introduced by the NPPF which, through local and neighbourhood plans, allows communities to identify and protect green areas of particular importance to them. LGS designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.

Local Nature Recovery Strategy (LNRS)

Local nature recovery strategies are a system of spatial strategies for nature and environmental improvement required by law under section 106(5) of the Environment Act 2021. Each strategy must agree priorities for nature's recovery, map the most valuable existing areas for nature and map specific proposals for creating or improving habitat for nature and wider environmental goals.

Local Nature Reserves (LNR)

Non-statutory habitats of local significance designated by local authorities where protection and public understanding of nature conservation is encouraged.

Local Plan

The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Local Planning Authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local Wildlife Sites (LWS)

Non-statutory sites that are designated for their local nature conservation value.

Main Town Centre Uses

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major Development

For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Market Housing

Private housing for rent or for sale where the price is set in the open market.

Micromobility

The use of small, low speed vehicles that can transport people or goods. They can include scooters, cycles, skateboards, hoverboards and even segways. They come in many forms, including those powered by electric motors and those powered by people.

National Design Guide

A guide which illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

National Model Design Code (NMDC)

A guide which provides detailed guidance on the production of design codes, guides and policies to promote successful design.

National Nature Reserves (NNRs)

Areas designated with the aim of securing protection and appropriate management of the most important areas of wildlife habitat, and to provide a resource for scientific research. All National Nature Reserves are Sites of Special Scientific Interest.

National Planning Policy Framework (NPPF)

A document which sets out government's planning policies for England and how these are expected to be applied.

Neighbourhood Centre

Very small centres which provide an element of local shops and/ or service provision to the local community. Along with local centres, they provide essential goods and services to their immediate neighbourhood.

Neighbourhood Plan

A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004). A neighbourhood plan will contain policies or allocations to help shape new development and support delivery of strategic policies set out in the local plan, for the neighbourhood area.

Net Zero-Energy (NZE) or Zero-Energy Building (ZEB)

An equilibrium is achieved between the amount of greenhouse gas that has been emitted into the atmosphere and the amount that has been removed.

Non-designated Heritage Assets

These are locally identified buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.

Non-strategic Policies

Policies which address more detailed matters for specific areas, neighbourhoods or types of development. For example, site allocations, provision of infrastructure and community facilities at a local level and establishing design principles.

North Solent Shoreline Management Plan (SMP)

A high level, non-statutory, policy document that sets out a framework for the management of over 386km of coastline and coastal defences.

Nutrient Neutrality

A means of ensuring that a development plan or project, within catchment areas of vulnerable watercourses (such as The Solent), does not result in a net increase of nutrients (phosphates and nitrates) in those watercourses beyond current levels. Where neutrality measures are needed, the purpose of these mitigation measures is to avoid impacts to the designated sites, rather than compensating for the impacts once they have occurred.

Open Space

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Out of Centre

A location which is not in or on the edge of a centre, but not necessarily outside the urban area.

Passive Resistance Measures (in relation to flood risk)

Measures which are installed into a property and do not require further deployment or activation before a flood event, such as a full height door or automatic airbrick cover (CIRIA, 2021).

Passivhaus Standard

An international energy performance standard for achieving high energy efficiency in a building (new and/or existing). Passivhaus buildings provide a high level of occupant comfort using very little energy for heating and cooling.

Partnership for South Hampshire (PfSH)

A partnership of twelve local authorities around the Solent that aim to improve the environmental, cultural and economic performance of the South Hampshire area. Formerly the Partnership for Urban South Hampshire (PUSH)

Portsea Island Coastal Strategy Study

A strategy that builds on policies set out in the North Solent SMP and helps decide how the coastline surrounding Portsea Island, Portsmouth, Hampshire will be managed for the next 100 years.

Preservation (relating to heritage)

The process of keeping a heritage asset the same or preventing it from being damaged/destroyed.

Primary Shopping Area

A defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage). In Portsmouth, Primary Shopping Areas are referred to as Core Commercial Areas, to reflect the diversity of uses within them.

Public Realm

Those parts of a village, town or city (whether publicly or privately owned) available, for everyone to use. This includes streets, squares and parks.

Ramsar Sites

Wetlands of international importance, designated under the 1971 Ramsar Convention.

Regeneration

The holistic process of reversing economic, social and physical decline in an area in order to provide demonstrable benefits to the local community and improve their quality of life.

Renewable Energy

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.

Section 106 Agreement

A legal agreement under section 106 of the 1990 Town & Country Planning Act. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.

Self-build and Custom-build Housing

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Sense of Place

A highly subjective term which relates to the meaning and emotions a person attaches to a particular area or environment, based on their experiences. It can also be used to describe the unique character of a particular area.

Sequential Test Assessment (relating to flood risk)

Sequential testing is used to guide development to areas at lowest risk of flooding, by requiring applicants to demonstrate that there are no alternative lower risk sites available where the development could take place. If there are no other alternative locations, then the development must pass the 'exception test' (see definition above).

Shared Ownership

Homes whereby a person buys a percentage of the property and pays rent on the remainder.

Shared Transport

A mode of transport that is used by more than one user, such as public transport, bike-sharing, car-sharing or car clubs.

Sheltered accommodation

Housing specially designed to provide a safe environment for elderly or disabled people who are able to live quite independently, but may need the occasional help or support. There is often shared facilities and a warden.

Site Allocation

A site that is allocated in the Local Plan for a specific purpose, such as, but not limited to, housing, employment, retail or green space.

Sites of Importance for Nature Conservation/ Sites of Nature Conservation Importance (SINC/SNCI)

A local site which is of substantial nature conservation value. They are also known nationally as 'Local Wildlife Sites.'

Sites of Nature Conservation Importance (SNCI)

Locally important sites of nature conservation adopted by local authorities for planning purposes.

Sites of Special Scientific Interest (SSSI)

A site designated by Natural England under the Wildlife and Countryside Act 1981 as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (plants, animals and natural features relating to the Earth's structure).

Southampton and Portsmouth City Deal

The City Deal, signed on the 12th November 2013, is between the Government, local businesses and leaders from Southampton, Portsmouth and Hampshire Councils and the Solent Local Enterprise Partnership (Solent LEP). It provides £953 million of investment into the Southampton and Portsmouth areas and maximises both cities' key marine and maritime assets through the provision of new housing and employment sites.

Spatial Position Statement

A statement produced by the Partnership for South Hampshire (PfSH), which sets out the overall need for and distribution of employment and housing development in South Hampshire, in order to promote economic growth, jobs and homes for all.

Special Areas of Conservation (SACs)

An area of open water or land of international importance designated to conserve natural habitats and wild fauna and flora, which are considered rare or endangered and are recognised as being under a particular threat. They are given special protection under the European Union's Habitats Directive.

Special Protection Areas (SPAs)

Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Social Rented

A form of rent that is paid to registered providers (housing associations) or the council.

Solent Waders and Brent Goose Strategy (SWBGS)

A framework that aims to identify, protect and enhance inland sites that form part of the ecological networks used by overwintering wading birds and brent geese.

Statement of Common Ground (SCG)

A signed statement between the local planning authority and other interested parties on strategic cross boundary issues, which sets out matters of agreement and disagreement.

Statement of Community Involvement (SCI)

An SCI sets out the processes to be used by the local authority in involving the community in the preparation, alteration and continuing review of all local development documents and development control decisions. It is an essential part of Local Plans.

Strategic Flood Risk Assessment (SFRA)

A SFRA is a study carried out by a local planning authority to assess flood risk in the local plan area and the risks to and from surrounding areas. It is part of the evidence base that supports a local plan. There are two levels of SFRA. All local planning authorities need to carry out a level 1 assessment at least, and it may be necessary to expand the scope of this assessment to a more detailed level 2 assessment.

Strategic Policies

Policies which address a local planning authority's overall priorities for the development and use of land in their area. They should not cover detailed matters that are more appropriately dealt with through development management policies or neighbourhood plans.

Strategic Road Network (SRN)

The Strategic Road Network is at the core of England's transport system, consisting of 4,500 miles of motorways and major A-roads, and its arteries provide connections to the country's major towns and cities. National Highways are responsible for the SRN, all other roads are managed by local or regional authorities.

Strategic Site

A site allocated in the Local Plan, the development of which is mission critical for achieving the vision of the Local Plan.

Streetscape

The collective appearance of all buildings, structures, gardens and public realm (including hard and soft landscaping) within the context and setting of an individual street (or part thereof). (Depending on circumstances it can be used interchangeably with the term 'townscape').

Supplementary Planning Document (SPD)

Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as

design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Supported Housing

A type of accommodation where housing is provided alongside care, support or supervision to help people live as independently as possible in the community.

Sustainability Appraisal

An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to assess the extent to which the emerging plan, when considered against reasonable alternatives, will help achieve sustainable development.

Sustainable Development

Development that meets the social, economic and environmental needs of the present, without compromising the ability of future generations to meet their own needs.

SuDS Approving Bodies (SAB)

A specific organisation established/assigned to deal with the design, approval and adoption of sustainable urban drainage systems (SuDS) within any new development consisting of two or more properties.

Sustainable Drainages Systems (SuDS)

A drainage solution which is designed to manage surface and groundwater sustainably, by mimicking natural drainage regimes and avoiding the direct channelling of surface water through networks of pipes and sewers to nearby watercourses.

Sustainable Transport

Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking, cycling, low and ultra-low emission vehicles, car sharing and public transport.

Tide locking

Prolonged high sea levels can prevent river flows and drainage networks from discharging, causing them to back up and result in 'tide locking.'

Transport Assessment

An in-depth assessment of the potential implications a proposed development may have on the local transport network, and the measures that shall be taken to mitigate against them.

Transport Statement

A Transport Statement is a 'lighter touch' version of a Transport Assessment and is used in some cases where transport issues arising out of development proposals do not require a full Transport Assessment. They are typically used for smaller scale developments.

Travel Plan

A long-term management strategy for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel.

Townscape

The collective appearance and components of a place including all of its: buildings, structures, gardens, public realm (hard and soft landscaping). The term can apply at the scale of a street, but also to an area of wider scope, context and setting. Its use implies a concern for how these elements may be considered and combined in a way which seeks to positively enhance the distinctive appearance of a particular locality or place.

Town Centres

Area defined on the local authority's policies map, which may include the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres, local and neighbourhood centres. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Travelling Showpeople

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

Tree Preservation Order (TPO)

A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to a TPO may not normally be topped, lopped or felled without the consent of the local planning authority. Trees in a conservation area that are not protected by an Order are protected by the provisions in section 211 of the Town and Country Planning Act 1990.

Use Classes Order

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories. The current Use Classes are as follows:

Class B (B2 General industrial and B8 Storage or Distribution), Class C (C1 Hotels, C2 Residential Institutions, C2A Secure Residential Institution, C3 Dwellinghouses and C4 Houses in multiple occupation), Class E (E(a)-E(g) Commercial, Business and Service), Class F (F1 Learning and non-residential institutions and F2 Local Community) and 'Sui Generis' (uses that are specifically defined and excluded from classification by legislation and uses falling outside of the defined limits of any other use class, 'a class of its own.')

Planning permission is not needed for changes of use within the same use class.

Urban Greening

A process of improving and increasing the amount of green infrastructure provision in urban areas, such as installing trees, parks and green walls.

Unidentified Heritage Assets

Assets that are yet to be identified which could become designated or locally important as a result of further assessment.

Viability Assessment

A financial appraisal of the profit and loss arising from a proposed development or a development plan's policies or standards, considering the estimated value of the scheme or viability impact of a plan upon completions and other building and development costs incurred delivering the scheme. Viability assessment for development plan-making should ensure that policies are realistic and deliverable i.e, that the total cumulative cost of all relevant policies will not undermine delivery of the plan.

Windfall housing/sites

Sites which have not been specifically identified in the development plan.

Written Scheme of Investigation (WSI)

A document which outlines the known and potential archaeological features/deposits/built heritage elements on a development site, and the proposed exploratory works associated with them.

Sustainability Appraisal (SA) for the Portsmouth Local Plan

SA Report to accompany Regulation 19 consultation

Portsmouth City Council

March 2024

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Quality information

| Prepared by | Checked by | Verified by | Approved by |
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| CB: Principal Environmental Planner | NCB: Technical Director | IM: Associate Director | IM: Associate Director |
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1. Introduction

- 1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Portsmouth Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

SA explained

- 1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 1.3 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.³ The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.4 More specifically, the SA Report should answer the following three questions⁴:
1. What has Plan-making / SA involved up to this point? (Including in relation to 'reasonable alternatives')
 2. What are the SA findings at this stage? (i.e., in relation to the Draft Plan)
 3. What happens next? (What steps will be taken to finalise (and monitor) the plan)

This SA Report

- 1.5 This SA Report is published alongside the Pre-Submission Portsmouth Local Plan, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. A Non-Technical Summary is available separately. This report seeks to answer each of the three SA questions (para 1.4) in turn, with a discrete ‘part’ of the report dedicated to each.
- 1.6 Before answering Question 1, two initial questions are answered to provide further context: i) What is the Local Plan trying to achieve? and ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012) and subsequent revisions (2023). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document. Where legislation is referenced, it should be assumed it is ‘as amended’.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three ‘pillars’ of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

⁴ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

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2. What is the Local Plan seeking to achieve?

2.1 This chapter of the report sets out the vision and objectives for the Local Plan. Once adopted, the Portsmouth Local Plan will set out the framework to guide and shape development in Portsmouth up to 2040. It will replace the Portsmouth Plan (Portsmouth Core Strategy) adopted in 2012, the two Area Action Plans for Somerstown and North Southsea (2012) and Southsea Town Centre (2007), and the saved policies from the Portsmouth City Local Plan (2006).

Local Plan vision

2.2 The Portsmouth Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision⁵ which was adopted in 2021:

“In 2040 Portsmouth will be an island city with an incredible waterfront, a rich cultural heritage, and a strong maritime history. With a naval base, international port, and strong links across the south, we are the centre of culture and enterprise for our area. In 2040 we are very proud of Portsmouth, how we behave towards each other and how it feels to live here.”

Strategic objectives

2.3 Six strategic objectives have been developed from this high-level vision, and the objectives are considered to be the stepping stones between the vision and the Local Plan policies. The six objectives are:

- **A healthy and happy City:** We do everything we can to enhance wellbeing for everyone in our city by offering the education, care and support that every individual needs for their physical and mental health. All our residents and communities live in good homes where they feel safe, feel like they belong, and can thrive.
- **A City rich in culture and creativity:** People in Portsmouth enjoy a vibrant cultural scene that makes the most of our location, our heritage, and our creative energy. We are full of things to do and places to be, welcoming locals and visitors with diverse events, attractions and venues that positively benefit our people and our City. We are known locally, regionally, and internationally as a great waterfront and City destination that brings people together.
- **A City with a thriving economy:** Portsmouth supercharges local businesses and entrepreneurs and attracts investment nationally and internationally from businesses of all sizes. We build strong partnerships between employers and people to develop an excellent skills base and offer brilliant career opportunities to young people, students and adults, growing a better future for us all.
- **A City of lifelong learning:** Our young people are encouraged to develop high, positive aspirations, and are fully invested in to make the most of their

⁵ [Imagine Portsmouth 2040 Vision](#)

- Official -

talent and potential. Adults have a wide range of education opportunities to choose from at every stage of life that empower them and enrich their lives.

- **A green City:** We have excellent air quality because of our green spaces and sustainable transport, and this means our people live healthy and active lives. We are carbon neutral, use renewable energy and actively work to address climate change. We protect and enhance both our land and maritime environment for future generations.
- **A City with easy travel:** Fewer journeys are made by car because we have excellent public transport connections between bus, train, cycling and walking routes, making it easier and more enjoyable to be out and about. We encourage and support more walking and cycling, and we make it easy for people to travel regionally, nationally and internationally for work and pleasure.

- Official -

3. What is the scope of the SA?

- 3.1 The aim here is to introduce the reader to the scope of the SA, i.e., the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) the SA.
- 3.2 Further information on the scope of the SA - i.e., a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix B**.

Consultation on the scope

- 3.3 The Environmental Assessment of Plans and Programmes Regulations 2004 require that "*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the SA scope], the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁶ As such, these authorities were consulted on the SA scope in 2017. Since that time, the SA scope has evolved as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2017. It should be noted that updated scoping information is presented in **Appendix B** of this SA Report.

SA framework

- 3.4 **Table 3.1** presents the SA framework.

⁶ In accordance with Article 6(3), of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

- Official -

Table 3.1: SA framework

| SA Objective | Assessment Criteria | Potential Indicators |
|---|---|--|
| SA-1: Building a strong, competitive economy in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> | Will it provide new employment floorspace? | – Amount of new employment floorspace |
| | Will it tackle income/employment deprivation and promote social equity? | – Amount of vacant employment space |
| | Will it help with diversification of the economy? | – Reduction in unemployment levels |
| | Will it provide learning, training and skills? | – Employment per economic sector |
| | Will it support tourism? | – Improvement in educational attainments – Amount of visitor spend – Business start ups |
| SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> <i>Material Assets</i> | Will it contribute to the vitality of city, town, District and Local Centres? | – New retail/leisure/office development in the centres |
| | Will it create new retail / leisure / employment / housing / office development in the city centre? | – Change in Portsmouth's position in the national retail rankings |
| | | – Reduction in retail vacancy rates in the city centre and other key centres |
| SA-3: Promoting sustainable transport in Portsmouth SA themes; <i>Air</i> <i>Climatic Factors</i> <i>Human Health</i> <i>Population</i> | Will it have easy and safe access from homes to shops and services? | – Achieving a modal shift and decrease in commuter car use in the city |
| | Will it reduce air pollution? | – Decrease in amount of and/or severity of AQMAs |
| | Will it encourage walking and cycling to create a healthier city? | – Increase in new cycle routes |
| | Will it encourage public transport? | |
| SA-4: To tackle climate change, flooding and coastal change in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> <i>Climatic Factors</i> <i>Water</i> <i>Material Assets</i> | Will it include climate change mitigation or adaptation measures? | – Decrease in Portsmouth's greenhouse gas emissions |
| | Will it contribute to coastal flood risk mitigation measures? | – Planning applications approved in accordance with climate change mitigation or adaptation related policies |
| | Will it include surface water management and/or water consumption and efficiency measures? | – Achievement of BREEAM Excellent |
| | | – Progress on flood defences being built – No change or reduction in the level of water stress |
| SA-5: Delivering high quality homes in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> <i>Material Assets</i> | Will it provide homes to meet the diverse housing needs of the city? | – Proportions of housing types |
| | Will the needs of the ageing population be taken account of? | – Amount of homes suitable for or capable of adaptation to elderly/disabled use |
| | Will this help replace poor quality housing stock? | – Redevelopment or improvements/upgrading old housing stock – Amount of homes that meet or exceed the minimum space standards |

- Official -

| | Does it provide homes that meet minimum space standards? | |
|---|---|--|
| <p>SA-6: To promote healthy communities</p> <p>SA themes; <i>Air</i> <i>Human Health</i> <i>Population</i></p> | <p>Will it have/improve access to health and community facilities and other services?</p> <p>Will it improve access to open space and/or healthy lifestyles?</p> <p>Will it benefit deprived communities?</p> <p>Will it help reduce crime?</p> | <ul style="list-style-type: none"> - Distance to facilities - The amount of super output areas in Portsmouth - The amount of residents classified as obese or excess weight - New layouts designed to Design Out Crime standards |
| <p>SA-7: Conserving and enhancing the historic townscape</p> <p>SA themes; <i>Cultural Heritage</i> <i>Material Assets</i></p> | <p>Will it protect and enhance the historic/ cultural townscape and assets?</p> <p>Will it provide for increased access to and understanding and enjoyment of the historic environment?</p> | <ul style="list-style-type: none"> - The number and proportion of heritage assets and Conservation Areas on the Historic England Heritage at Risk Register - Buildings of historic interest given a new use/restored |
| <p>SA-8: Requiring good urban design in Portsmouth</p> <p>SA themes; <i>Human Health</i> <i>Material Assets</i></p> | <p>Will it secure good urban design?</p> | <ul style="list-style-type: none"> - The amount of Planning Applications refused on urban design terms - The amount of tall buildings refused for being outside the areas of opportunity for tall buildings - Any new developments winning an urban design award |
| <p>SA-9: Conserving and enhancing the natural environment in Portsmouth</p> <p>SA themes; <i>Biodiversity</i> <i>Fauna</i> <i>Flora</i> <i>Material Assets</i> <i>Landscape</i> <i>Soil</i> <i>Water</i></p> | <p>Will it protect and/or enhance the local ecological systems?</p> <p>Will it protect and/or enhance green infrastructure and/or open spaces in the city?</p> | <ul style="list-style-type: none"> - Loss of greenspace/increase in greenspace - Condition of SPAs and SSSIs in Portsmouth - Any schemes to enhance biodiversity - Creation of pocket parks on schemes of 50 plus homes |
| <p>SA-10: Facilitating the sustainable use of natural resources in Portsmouth</p> <p>SA themes; <i>Human Health</i> <i>Climatic Factors</i> <i>Population</i> <i>Landscape</i></p> | <p>Will it contribute to reducing waste generation and/or diverting waste from landfill?</p> <p>Will it contribute to the reuse / recycling of minerals resources?</p> <p>Will it avoid unnecessary sterilisation of safeguarded minerals and waste infrastructure or mineral resources, or encroachment from incompatible land uses?</p> | <ul style="list-style-type: none"> - Arisings, treatment and movement of waste - Secondary and recycled aggregate capacity/ sales - Planning applications granted contrary to an objection from HCC on minerals and waste infrastructure or mineral resource safeguarding grounds |

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Part 1: What has plan-making/ SA involved to this point?

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4. Introduction (to Part 1)

- 4.1 In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then considered the appraisal findings when finalising the Local Plan.
- 4.2 This part of the report presents information regarding the consideration of reasonable alternatives, with alternatives explored in relation to both the spatial strategy and policy framework. This information is important given regulatory requirements.⁷
- 4.3 This report builds upon the SA work already undertaken to explore alternatives at the Issues and Options stage (2017) and the Regulation 18 'draft plan' stage, which was consulted upon in 2021. This followed consultation on Local Plan evidence base and on the Tipner Strategic Development Area, both in 2019. Alternatives work at this stage will also consider feedback from consultations, and the subsequent changes made to the emerging plan.

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5** – presents the reasons for selecting the alternatives dealt with at this stage.
 - **Chapter 6** – presents a summary of the appraisal of the alternatives, and
 - **Chapter 7** – explains the Council's reasons for selecting the preferred approach when considering the alternatives explored.

⁷ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

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5. Establishing reasonable alternatives

- 5.1 This chapter explains how the policy context and evidence base was drawn on to establish reasonable alternatives for appraisal and then consultation at this Regulation 19 stage of plan-making. Ultimately, the aim of this chapter is to present “*an outline of the reasons for selecting the alternatives dealt with*”, in accordance with regulatory requirements.
- 5.2 It should be noted that alternatives have been previously identified and assessed through the SA process. Options were explored in the:
- Issues and Options SA Report (2017) accompanying the Portsmouth Local Plan Issues and Options document for consultation in 2017; and
 - Interim SA Report (2021) accompanying the Regulation 18 draft Local Plan for consultation in 2021.
- 5.3 This latest iteration of the SA does not repeat any alternatives assessment undertaken to date, but rather seeks to identify how options have developed since previous appraisals and incorporate feedback from consultation.
- 5.4 This chapter is structured under the following questions:
- How much growth needs to be delivered?
 - Where could growth be located?
 - Are there additional considerations for future growth? and
 - What reasonable alternatives can be identified at this stage?

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How much growth needs to be delivered?

- 5.5 This sub-section explores housing growth needs, affordable housing needs, and employment needs, before summarising the key changes and progression since the Interim SA Report (2021).

Housing needs

- 5.6 A Housing and Economic Development Needs Assessment (HEDNA) was completed to inform the Regulation 19 Local Plan. This study aims to provide evidence with regards to housing and employment land needs and requirements, and related policy.
- 5.7 Housing needs to date have been calculated using the Standard Method as set out in the National Planning Policy Framework (NPPF). The HEDNA identifies that, using the Government's Standard Method, the calculated housing need for Portsmouth is 899 new dwellings per annum and this would "*appear to be at the very upper end of any reasonable analysis of housing need in the city.*" This calculation is based on household growth for the 2023-33 period shown by 2014-based household projections and an affordability uplift of 21% to reflect the affordability ratio of 7.31.
- 5.8 Planning practice guidance notes that an Authority can move away from the Standard Method where there are exceptional circumstances. The HEDNA recognises that population growth has been less than projected by 2014-based projections and analysis of past housing completions do not point to lower growth due to reduced housing delivery. It indicates that trend-based projections would be expected to show lower growth and a lower housing need. However, this is not a trend unique to Portsmouth, and an analysis of Patient Register data indicates population increases higher than those reported by ONS. On this basis, it is deemed that the data does not sufficiently point to 'exceptional circumstances' in Portsmouth, but other methods of calculating housing need tend to indicate a lower need (e.g., projections based on birth and death rates and migration information suggests an annual need for 543 new dwellings, or 655 dwelling per annum factoring in an affordability uplift).
- 5.9 Following the recommendations of the HEDNA, the Council are progressing with the Standard Methodology calculation estimating a need for **899 new dwellings per annum**, whilst monitoring any new releases of relevant data.

Affordable housing needs

- 5.10 The link between affordable housing need and overall need (of all tenures) is complex and in trying to make a link it is important to recognise that many people identified with affordable housing needs are already in housing (and therefore do not generate a net additional need for a home).
- 5.11 The HEDNA has investigated affordable housing needs split between a need for social/ affordable rented accommodation (based on households unable to buy or rent in the market) and the need for affordable home ownership (including those who can afford to rent privately but cannot afford to buy a home). When looking at needs from households unable to buy or rent in Portsmouth, the evidence suggests a need for 851 affordable homes per annum across the city. This does not require the Council to increase the Local

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Plan housing requirement due to affordable needs but does suggest that the City Council should maximise the delivery of affordable housing at every opportunity.

- 5.12 When looking at affordable rented accommodation, analysis suggests a need for both social and affordable rented housing. However, with social rents being more affordable (benefiting a wider range of households), the HEDNA recommends that social rents be prioritised where delivery does not prejudice the overall delivery of affordable homes.
- 5.13 When looking at affordable home ownership the analysis is less conclusive about the scale of the need but does recognise that it is lower than social and affordable renting needs. In terms of the type of affordable home ownership, the HEDNA recommends the prioritisation of shared ownerships schemes over First Homes (for which there is little evidence of genuine need).

Specialist housing needs

- 5.14 With regards to other housing needs, there is a notable student population attending the University of Portsmouth that has distinct housing needs. The city has seen significant private sector development of PBSA (Purpose Built Student Accommodation) in recent years, but the HEDNA identifies that in the 2022/23 academic year some 42% of students reside in HMOs (Houses of Multiple Occupation), higher than the national average of 27%. Moreover, the HEDNA identifies that this supply is rapidly falling and affordability worsening. With the University continuing with planned growth (of a minimum of 10% over the next three to four years) in the context of a falling supply of HMOs and local affordability issues, the HEDNA recommends that the Council support further PBSA development with affordable housing elements.
- 5.15 Additionally, in the context of an ageing population there is a continued need to support specialist C2 accommodation. The HEDNA forecasts a 39% increase in the population aged 65+ between 2021 and 2040, alongside a 49% increase in the number of people aged 65+ with dementia and a 45% increase in those aged 65+ with mobility problems. The HEDNA indicates a need for 770 additional housing units with care split between market and affordable housing and a need for additional residential and nursing care bedspaces.
- 5.16 ORS completed an updated Gypsy and Traveller Accommodation Assessment (GTAA) in 2023 which has identified no additional pitch needs within Portsmouth in the period up to 2040. Despite this, it does recognise the need to continue a criteria-based policy approach to gypsy and traveller development needs in order to address any need associated with windfall applications, immigration, or from households currently living in bricks and mortar.

Employment land needs

- 5.17 The HEDNA states that the Portsmouth economy is effectively an island economy and therefore has land development constraints. Recognising it is home to a university, the Royal Navy at Portsmouth Naval Base, and the Portsmouth International Port, the HEDNA identifies that the city has above average levels of employment in the health, manufacturing, and public administration and defence sectors.

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5.18 Overall, the HEDNA identifies that the city should be planning for an additional 6,800 to 7,300 new jobs in the period up to 2040. A range between an additional 42,500sqm to 61,700sqm is suggested for office development and the need for industrial ranges from a loss of 42,800sqm to a need for an additional 96,300sqm. For office development the lower end of the range assumes greater levels of working from home in the future where the focus is expected to be on higher quality employment space that draws staff back into the office post pandemic. For industrial development the upper end reflects adjustments to the sectors which operate in a range of factories and warehouses including higher quality premises suitable for advanced and marine technology and manufacturing. The HEDNA preferred scenario is to plan for around 42,500sqm of office space, and 96,300sqm for industrial and warehousing.

Changes since last consultation

- 5.19 The housing need figure remains broadly the same as that consulted on at the Regulation 18 stage (2021), at 899 new dwellings per annum compared to 872 new dwellings previously. Affordable housing needs have been better defined at this stage and, whilst these needs do not affect the overall need figure, it will influence policy directions relating to the delivery of affordable housing as part of future housing growth.
- 5.20 The HEDNA has provided a more up-to-date and localised assessment of employment land needs and indicates a lower need for both office space and industrial land than the 2021 PfSH Economic, Employment, and Commercial (including logistics) Needs Study⁸ (which was the evidence used to inform Regulation 18 consultation stage). The Council are continuing to promote employment development locations that have been progressed to date and will provide policy protections for existing employment premises/land that is fit for purpose. The HEDNA states that “*the proposed strategic and non-strategic allocations are considered appropriate*”, whilst noting that Lakeside will need to demonstrate a high-quality offer to attract occupation over the plan period.
- 5.21 Another change that impacts the growth trajectory is an extended plan period in the pre-submission version of the plan, which now covers a 20-year period (rather than 18 years as previously drafted) from 2020 to 2040.

⁸ [Economic, Employment and Commercial Needs \(including logistics\) Study Final Report](#)

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Where could growth be located?

5.22 This sub-section explores the potential locations across the city that could accommodate growth, focusing on key sub-areas, site options emerging, and opportunities for regeneration and intensification.

Housing and Economic Land Availability Assessment (HELAA)

5.23 The HELAA details the Council's assessment of potential housing and employment sites deemed either developable or deliverable across the city and is the main evidence-based study on land supply. The HELAA (alongside development monitoring data and other sources) demonstrates a forecasted total housing supply of 13,603 new homes over the plan period, which is an annualised figure of around 680 new homes a year. It demonstrates that Portsmouth cannot meet its need as calculated by the Standard Methodology due to its constrained island geography. All of the sites assessed as suitable, achievable, and available in the HELAA are allocated or identified in the Local Plan for housing, employment or mixed use development.

5.24 All HELAA sites have been subject to a high-level SA GIS analysis, against broad indicators identified under the each of the SA topics. This analysis was originally undertaken to inform the Interim SA Report (2021) and has now been updated in line with the most recent HELAA. The methodology and results of this assessment are provided in **Appendix C**. It is important to note that this assessment does not indicate the potential for 'significant effects', it is a high-level quantitative analysis that can be used to inform the more detailed or qualitative assessment of options that are being developed.

Potential growth locations

5.25 All the growth locations explored in the Interim SA Report that were identified as having little to no potential for growth continue to be discounted at this stage (see the [Interim SA Report](#) (2021) for detailed reasoning).

5.26 Growth locations that continue to be a focus for the Local Plan are explored in turn below, with a discussion around the progression of these options since Regulation 18 consultation.

Tipner East and Tipner West and Horsea Island East sites

5.27 In the Regulation 18 Local Plan there was a single allocation for Tipner. This was separated out in the Pre-Submission Plan to two sites, namely Tipner East and Tipner West & Horsea Island East. Following feedback at Regulation 18 consultation, the proposed scale of development at the Tipner West and Horsea Island East site has been substantially reduced. A new scheme is proposed which largely focuses on delivering a marine employment hub of 58,000sqm alongside a new bridge, new flood management measures, shops, a new meeting place, and 814 to 1,250 new homes (down from approximately 3,500-4,000 new homes previously). This scheme will also deliver significant land remediation works.

5.28 This area is expected to form a new gateway to the city along with Tipner East providing a new public transport hub (including Park & Ride) and new sea

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defences. Tipner East at the time of the last consultation had permission for 626 dwellings and it was expected that this would be uplifted. There is now permission for 1,056 new homes at Tipner East. New open space covering 64 hectares is allocated under a separate policy at Horsea Island.

- 5.29 The strategic allocation at Tipner West and Horsea Island East site has been assessed through the accompanying Habitats Regulations Assessment (HRA). Following Appropriate Assessment, the HRA cannot rule out an adverse effect on the integrity of the national and internationally designated biodiversity sites. Nonetheless, the proposal is being progressed on the basis that it meets the three legal tests for derogation (there are no feasible alternatives, there are imperative reasons of overriding public interest (IROPI) for progressing the allocation; and necessary compensatory measures can be secured). The HRA has explored alternatives separately to the SA (in line with the different regulatory requirements). HRA alternatives have explored options in relation to flood prevention and sea defence, site decontamination, marine employment hub development, the proposed bridge link, and housing development. The HRA recognises the key role of housing as 'enabling development' vital to financial viability, and the lack of feasible/ available alternative locations to support marine employment hub development (recognising Tipner as a long-standing identified prime site for such development given its potential for redevelopment, waterfront location, and deep-water access).
- 5.30 The proposal is also being developed in the context of the Council's corporate obligations such as delivery of its Economic Regeneration Strategy, its Local Transport Plan, and the City Deal. All of these provide a strong case for development at Tipner West & Horsea Island East (including the bridge link across Tipner Lake), as well as the Council's role as Lead Local Flood Authority (LLFA) and the opportunities at the site for improved flood defences.
- 5.31 RSPB and Hampshire & Isle of Wight Wildlife Trust object to the strategic allocation and urge the Council to explore options that do not involve the direct loss of SPA/ Ramsar habitats. Policy PLP3 in the Pre-Submission Local Plan acknowledges that some loss of SPA/Ramsar habitats is inevitable as a result of dredging to establish and maintain deep water access to the marine hub, but the policy otherwise favours the avoidance of any loss of SPA/Ramsar habitats. While the allocation identifies an area totalling 0.5ha for possible reclamation from Portsmouth Harbour and contemplates the possibility of development on up to 3.6ha of terrestrial protected habitat, this will only be permitted where shown to be necessary for project viability and feasibility. It is noted that options for the Tipner peninsula involving no land reclamation were explored in the Interim SA Report in 2021.

Portsmouth City Centre

- 5.32 Options for City Centre growth have been explored to date through the Interim SA Report (presented at Regulation 18 consultation) and remain broadly the same as before supported by ongoing masterplanning work. At this stage, sites (including the large City Centre North site set to deliver 2,300 homes) are cumulatively expected to deliver 4,158 new homes, 20,000sqm (gross) office space (due to redevelopment of existing office stock the net gain will be 1,546sqm), and a new market.

St James Hospital and Langstone Campus

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5.33 There are no significant changes in the continued progression of this site, which is expected to deliver 417 new dwellings alongside new healthcare facilities, new education facilities, and new sports and community facilities.

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Lakeside Business Park

5.34 Following consultation and continued viability testing, additional housing development alongside employment development at Lakeside is no longer being pursued. The site is a focus for employment development and is expected to deliver 50,000sqm of new office floorspace.

Cosham

5.35 As Local Plan work has progressed, no deliverable strategic options for development in Cosham have been identified. Whilst opportunities for estate regeneration will continue to be explored by the Council, significant development in this area is not identified as part of housing supply over the plan period. Small sites identified as developable in the HELAA will be progressed.

Fratton Park and the Pompey Centre

5.36 There are no significant changes in the continued progression of this site, which is expected to deliver the expansion of the football stadium alongside 710 new homes, small commercial and business/ service uses associated with the Club and stadium, a new hotel (approximately 145 rooms), and mixed conference and event facilities.

Site allocations

5.37 Potential additional allocation sites are emerging at this stage. These sites have been considered through the HELAA and SA to date and include:

- Port Solent (delivering 500 new homes)
- St John's College (delivering 212 new homes)
- Fraser Range (delivering 134 new homes)
- The News Centre, Hilsea (delivering 100 new homes and a new electric bus depot with supporting small-scale commercial and community uses)
- Somers Orchard, Somerstown (delivering 565 new homes)
- Land west of Portsdown Technology Park (delivering 12,500 sqm new employment space)

Estate regeneration

5.38 Council owned housing estates continue to be a focus for renewal and regeneration, with a continued focus on opportunity areas at Somerstown and North Southsea, Buckland, Landport, Portsea, and Paulsgrove. However, at this stage, no strategic opportunities have been identified and no supply figures for the plan period have been identified.

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Non-strategic sites

5.39 The HELAA has been updated following Regulation 18 consultation and continues to identify a supply of non-strategic (small and medium) housing, employment, and mixed-use development sites. The HELAA and Appendix 2 of the Local Plan has identified a contribution of 1,543 new homes over the plan period from small and medium sites of less than one hectare (with capacity for five or more dwellings). The HELAA and Appendix 3 of the Local Plan further identifies a total supply of 457 new homes on sites over one hectare (with capacity for five or more homes). A 15% (300 homes) 'non-implementation discount' (explained in next section) is applied to these totals to provide the necessary flexibility in delivery. On this basis, the HELAA predicts a total supply of 1,700 new homes over the plan period from non-strategic sites. These figures have been carried forward to Table 6.1 of the Local Plan.

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Are there additional considerations for future growth?

5.40 This sub-section seeks to identify wider parameters that have a bearing on a future growth alongside the needs and location-specific work discussed above.

Under-delivery issues and Duty to Cooperate

5.41 Portsmouth has experienced historic under delivery issues and on this basis the Council have sought to apply an under-delivery discount – the ‘non-implementation discount’ to future development sites (referred to in above discussion on non-strategic sites). This 15% discount seeks to capture a more realistic delivery rate based on past trends. This also captures a more realistic supply and likely shortfall (against needs estimated using the NPPF Standard Methodology).

5.42 PCC continues an active membership of the Partnership for South Hampshire (PfSH) and the Local Plan seeks to take account of wider issues and opportunities affecting the PfSH sub region. The Spatial Position Statement (SPS) published in December 2023⁹ recognises housing shortfalls across the PfSH sub region, including at Portsmouth.

5.43 With the progression of the latest SPS and work of the partnership, it is expected that these shortfalls will diminish over time with emerging additional land allocations exceeding local needs within certain areas and with the ongoing investigation of Broad Areas of Search for Growth as identified in the SPS.

5.44 A contribution of 800 homes from Fareham Borough Council has been agreed and accounted for in the adopted Fareham Local Plan 2037.

Other forms of housing supply

5.45 Portsmouth has benefitted from recent delivery of new Purpose-Built Student Accommodation (PBSA), but with a reduction of schemes in the pipeline, delivery rates are expected to be lower than that experienced in recent years. The equivalent contribution of recent student housing development has been included within the Council’s completions and commitments figure, which currently stands at 1,455 after applying a 15% ‘non-implementation discount’ to outstanding commitments. A further 731 new homes are expected as an equivalent contribution from Houses in Multiple Occupation (HMOs) which house many of the students in Portsmouth.

5.46 Using the government’s proposed ratio of 1.813 C2 accommodation beds being the equivalent to one dwelling, a further 44 new homes are expected as an equivalent contribution from C2 accommodation over the plan period.

5.47 In addition to the sources discussed above, the HELAA estimates for small-scale residential windfall development sites (sites delivering less than five new homes) a total of 1,007 new dwellings over the 20-year plan period.

⁹ [PfSH Spatial Position Statement](#) (2023)

- Official -

Options explored in the Interim SA Report (2021)

5.48 The SA to date has sought to explore all options for meeting the estimated housing needs of Portsmouth. Most recently the [Interim SA Report \(2021\)](#), recognising the housing supply constraints, assessed options that would meet needs entirely within the city boundary, and options where some reliance was placed on meeting a proportion of needs outside the city boundary through Duty to Cooperate. These options tested meeting needs by increasing densities at strategic and non-strategic sites, by releasing open spaces, by releasing strategic employment land, or through accelerated estate regeneration schemes. These options also tested a reduced reliance on strategic development sites – including no land reclamation at Tipner, no housing delivery at Lakeside, and reduced development within the City Centre, at Cosham (which is now allocated as a strategic site in the Local Plan), and at the Pompey Centre.

- Official -

What reasonable alternatives can be identified at this stage?

5.49 This sub-section seeks to draw together the work that explored growth needs, growth locations and additional considerations for growth, to arrive at the current reasonable alternatives for plan-making and SA.

Housing supply

5.50 The supply sources discussed above are brought together in Table 5.1 and balanced against the forecasted need. This represents the current potential total housing contribution identified within Portsmouth, which falls short of top-end estimations of needs (using the Standard Methodology) but broadly aligns with mid-level (trend-based population projections) estimates identified within the HEDNA.

- Official -

Table 5.1: Housing needs and supply forecasts

| Source | | No. of homes |
|---|---|---------------|
| Strategic development sites | Portsmouth City Centre | 4,158 |
| | Tipner West & Horsea Island | 814 |
| | Tipner East | 1,056 |
| | St James' Hospital and Langstone Campus | 417 |
| | Fratton Park and the Pompey Centre | 710 |
| Strategic allocations | Port Solent | 500 |
| | St John's College | 212 |
| | Fraser Range | 134 |
| | The News Centre, Hilsea | 100 |
| | Somers Orchard, Somerstown | 565 |
| HELAA sites | Small/ medium sites <1ha with capacity for 5 or more homes. | 1,543 |
| | Sites >1ha with capacity for 5 or more homes. | 457 |
| | 'Non-Implementation 'Discount' (15%) | -300 |
| Net completions | Sites of 5 or more dwellings 2020-23 | 305 |
| Permissions outstanding | As of 31 st March 2023 | 1,353 |
| | 'Non-Implementation 'Discount' (15%) | -203 |
| Windfall estimate | Small sites <5 homes | 1,007 |
| Equivalent contributions | HMOs | 731 |
| | C2 accommodation completions | 44 |
| Total supply | | 13,603 |
| Housing needs | Standard Methodology | 17,980 |
| | HEDNA trend-based population projections | 13,100 |
| | HEDNA jobs growth lower-end estimations | 8,620 |
| Need/ supply balance | Standard Methodology | -4,377 |
| | HEDNA trend-based population projections | +503 |
| | HEDNA jobs growth lower-end estimations | +4,983 |
| Potential contributions from outside the city (DtC) | Fareham | 800 |
| Need/ supply balance including DtC | Standard Methodology | -3,577 |
| | HEDNA trend-based population projections | +1,303 |
| | HEDNA jobs growth lower-end estimations | +5,783 |

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Key considerations for housing growth

- 5.51 A key consideration, and one of the most contentious aspects of the Local Plan, is the Tipner West and Horsea Island East proposal, and it is recognised that the SA to date has included this key strategic development site in all city-wide housing options explored (recognising its continuing work and context as part of the City Deal). Closely linked to this proposal is the recognition of the extent of proposed development within Flood Risk Zones 2 and 3.
- 5.52 A Level 1 and 2 Strategic Flood Risk Assessment (SFRA) has been developed alongside plan-making. Recommendations are made through the Level 1 report for Portsmouth CC to consider when developing their Local Plan, drafting strategic policies, and establishing requirements for development management. It assesses the risk to an area from all sources of flooding, now and in the future, taking in account the impacts of climate change, as well as assessing the cumulative impact that land use changes and development in the area will have on flood risk.
- 5.53 Local Planning Authorities apply the Sequential Test (in line with national policy) to avoid flood risk and steer development towards those areas at least risk of flooding. The SFRA Level 1 helps to apply this. Following the application of the Sequential Test, it may not always be possible to avoid locating development in areas at risk of flooding, as is the case for Portsmouth. SFRA Level 2 therefore helps to apply the Exception Test (again in line with national policy). The SFRA Level 2 focusses on strategic and allocated sites located within flood zones and provides more detailed information about the nature of flood risk in these areas. The SFRA Level 1 and 2 recommend measures that can support the council in mitigating and managing flood risk when development encroaches into areas at risk of flooding.
- 5.54 Housing options at this stage have thus sought to support the Council in developing sequential testing, and in thoroughly testing wider options for housing growth that exclude additional housing development at Tipner West and Horsea Island (above that already committed at Tipner East).

City-wide spatial options for housing growth

- 5.55 The following housing growth options are identified (informed by the HELAA) for SA:
- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
 - **Option H2:** Maximise housing delivery¹⁰ (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
 - **Option H3:** Develop some areas within FRZ2/ 3¹¹ reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply and meet the lower end estimates for housing needs, but is

¹⁰ See Para 5.56

¹¹ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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still unlikely to meet the housing need in full using the standard methodology)

- **Option H4:** Maximise housing delivery¹² (where possible) on sites, including sites within FRZ2/ 3¹³ (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology)

5.56 Avoiding development in Flood Risk Zones 2 and/ or 3 will mean avoiding development at some allocated and identified sites (sites where >50% of the land intersects Flood Risk Zones 2 and/ or 3). These include:

- Strategic Sites: Tipner West & Horsea Island East and Tipner East (no additional development above that committed).
- Site Allocations: Port Solent and The News Centre, Hilsea
- Small and medium housing sites: NE02 (Smeaton Street Garages), PA03 (140 Southampton Road), EC07 (4 Waverley Road), DF06 (East Lodge Farm), HI04 (land at Pompey Health and Fitness Club), ST17 (Clarence Pier), EC01 (Fraser Range), EC14 (Eastney Swimming Pool), SJ12 (84-88 Clarendon Road), SJ16 (Wimbledon Park Sports Park Centre)

5.57 When maximising delivery at sites, the Council have determined that the following sites are suitable to be tested to deliver higher housing numbers:

- Somers Orchard, Somerstown – this site is in FRZ1. As a Council owned estate, a higher density scheme delivering 700 homes in total is being tested (delivering an additional 134 homes than the currently estimated 566 dwellings). Applicable to Options H2 and H4.
- The News Centre, Hilsea – a housing only scheme (i.e., no delivery of a new bus depot) is being tested as an alternative which could deliver 200 homes in total (100 additional homes to the currently estimated 100 dwellings). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- City Centre – further intensification and regeneration at the City Centre could boost housing supply to potentially around 5,000 new homes (an additional 842 homes to that currently estimated) though this is notably likely to adversely impact strategic employment growth targets. Applicable to Options H2 and H4 as FRZ1.
- Port Solent – further intensification and regeneration at Port Solent could increase the number of homes delivered at this site to around 600-700 homes (100-200 additional homes to that currently estimated). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- St James' & Langstone Campus – a small part of this site lies within FRZ2/ 3. An option for increased development at this part of the site could deliver around 200 homes (an additional 80 homes to that currently identified). Applicable to Options H2 and H4 with development focused within FRZ1.
- Tipner West and Horsea Island East – maximising delivery on this site could see a total of 1,250 new homes. This is at the top end of the range of

¹² See Para 5.56

¹³ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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new homes for which the site is allocated. This is only applicable to Option H4, though it is recognised that this could emerge under H3 as well.

Key considerations for employment growth

- 5.58 With the HEDNA identifying employment growth levels somewhat lower than the sub-regional PfSH work has estimated, it is considered appropriate at this stage to investigate the key sites underpinning the employment growth strategy and options for employment growth levels. These are notably constrained by a lack of suitable sites and competing housing needs.
- 5.59 To inform plan-development, options for the level of growth have been identified and the Council has sought to identify how these levels of growth could realistically be met. This is split into options for office employment development and industrial/ warehousing employment development.

City-wide spatial options for employment growth

5.60 For office floorspace, the following options are identified for assessment:

- **Option OF1:** An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
- **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park. (PfSH estimate of need)

5.61 For industrial/ warehousing floorspace, the following options are identified for assessment:

- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need)
- **Option IF5:** An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (HEDNA top-end estimate of need)
- **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PfSH estimate of need)

Policy options

5.62 In the context of these discussions around future growth, there are notably a few policy areas that stand out with the potential to affect the overall growth strategy and thus warrant further attention as part of options assessment. These key policy focus areas have been developed in collaboration with PCC and cover Houses of Multiple Occupation, First Homes, and Biodiversity Net Gain.

HMOs

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5.63 Houses of Multiple occupation (HMOs) meet the needs of those that require a more affordable housing option (including around 42% of students) and the Council includes HMOs in its land supply data given the large amount permitted and delivered over recent years and the role they play in helping to meet the city's housing need. Most notably the HMO supply in Portsmouth is falling and affordability is worsening, and the supply of HMOs can reduce the availability of family-sized homes in the city. Given these implications for housing supply, the Council have identified a range of options for HMO policy direction. Policy directions may seek to place a percentage limit on HMOs within any given area, and there are options for the percentage level and radii distance that extends any application site. The options are summarised as follows:

- **Option HMO1:** No additional HMO development (0%) city-wide
- **Option HMO2:** 5% limit within 50m radius of application site
- **Option HMO3:** 5% limit within 100m radius of application site
- **Option HMO4:** 10% limit within 50m radius of application site
- **Option HMO5:** 10% limit within 100m radius of application site
- **Option HMO6:** 15% limit within 50m radius of application site

First Homes

5.64 The First Homes scheme is targeted specifically at first-time buyers and can offer a home at between 30 – 50% cheaper than its market value. These homes are either new builds (built by a developer), or purchases of an existing 'First Home' under the scheme. The scheme seeks to provide for affordable home ownership needs (separate to affordable renting needs) and has eligibility criteria which includes a maximum total annual household income of £80,000 in Portsmouth. Council's may also set further eligibility conditions which can for example, prioritise essential workers, people who live in the area, and those on lower incomes.

5.65 The Council is currently exploring the percentage of affordable housing that should be given over to the First Homes scheme, recognising that the scheme represents one element of affordable housing, targeted at a particular group (first-time buyers). It is important to note that all options form a percentage of the affordable housing element of a development proposal and they do not affect the overall level of affordable housing contributions (just the sub-type).

5.66 Three options have been identified in relation to First Homes:

- **Option FH1:** 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH2:** 10% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH3:** 25% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.

Biodiversity Net Gain

5.67 Biodiversity net gain (BNG) is an important principle for development which has emerged over recent years as a means of creating and improving natural

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habitats and reversing biodiversity decline trends. BNG makes sure development has a measurably positive impact on biodiversity, compared to what was there before development.

5.68 BNG has become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) which requires developers to deliver a BNG of 10%. The Local Plan policies can ultimately seek to align with the emerging planning law or look to exceed the requirement (it is not considered reasonable to seek lower percentages given the emerging law).

5.69 On this basis, two options have been identified in relation to BNG:

- **Option BNG1:** require 10% net gain in all developments.
- **Option BNG2:** require 20% net gain in all developments.

5.70 An assumption is made in that both options will prioritise on-site delivery wherever possible.

5.71 A total of six sets of options (relating to housing, employment, and HMOs, First Homes, and BNG policies) are taken forward for assessment in the next chapter.

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6. Appraising reasonable alternatives

6.1 This chapter presents appraisal findings for the housing growth options, employment growth options, and policy options established in Chapter 5. Two sets of employment growth options and options under three different policy themes follow the housing growth options.

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in text. Where appropriate neutral effects or uncertainty will also be noted. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.3 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference (separate to the summary of likely significant effects). This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the site option or options that are preferred from an SA perspective with '1' being the highest ranking. '=' has been used to highlight where options perform equally and cannot be differentiated between.

Housing growth options

6.4 Chapter 5 establishes the following four housing growth options for the purposes of SA:

- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
- **Option H2:** Maximise housing delivery¹⁴ (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
- **Option H3:** Develop some areas within FRZ2/ 3¹⁵ reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet the housing need in full using the standard methodology)
- **Option H4:** Maximise housing delivery¹⁶ (where possible) on sites, including sites within FRZ2/ 3¹⁷ (NB, this option is expected to slightly

¹⁴ See Para 5.56

¹⁵ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

¹⁶ See Para 5.56

¹⁷ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology)

| SA objective | | Option H1: Develop in low flood risk areas only | Option H2: Maximise housing delivery in low flood risk areas | Option H3: Some development within FRZ2/ 3 (current strategy) | Option H4: Maximise housing delivery including in FRZ2/ 3 |
|--|---------------------|--|---|--|--|
| 1 (Economy) | Significant effect? | No | Uncertain | Yes - positive | Yes - positive |
| | Rank | 3 | 4 | 1 | 2 |
| 2 (Town centres) | Significant effect? | No | No | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 3 (Sustainable transport) | Significant effect? | No | No | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 4 (Climate change, flooding, and coastal change) | Significant effect? | No | No | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 5 (Housing) | Significant effect? | Yes - positive | Yes - positive | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 6 (Healthy communities) | Significant effect? | Yes - positive | Yes - positive | Yes - positive | Yes - positive |
| | Rank | 2 | 2 | 1 | 1 |
| 7 (Historic environment) | Significant effect? | Uncertain | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 | 4 |
| 8 (Urban design) | Significant effect? | No | No | No | No |
| | Rank | 2 | 3 | 1 | 4 |
| 9 (Natural environment) | Significant effect? | Yes - negative | Yes - negative | Yes - negative | Yes - negative |
| | Rank | 1 | 2 | 3 | 4 |
| 10 (Natural resources) | Significant effect? | No | No | No | No |
| | Rank | 1 | 2 | 3 | 4 |

Economy

- 6.5 With regards to economic effects, a significant element of the employment growth strategy of the Local Plan rests on the delivery of the marine employment hub at Tipner West and Horsea Island East, and significant economic benefits are associated with the development proposals here. Avoiding housing development within Flood Risk Zones 2 and 3 (Options H1

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and H2) will ultimately remove the housing elements of plans at Tipner West and Horsea Island East and Port Solent (both City Deal sites) which could impact the viability of the overall proposals including the new transport hub, bridge link and improved access to the city centre from the west. Whilst this is unlikely to deliver significant impacts in relation to the baseline, it is recognised that Options H1 and H2 are less likely to fully realise the economic benefits (and significant positive effects) associated with the City Deal sites that are included in Options H3 and H4. Two smaller HELAA employment sites would also be removed from the growth strategy under Options H1 and H2 with the potential for minor negative effects. On this basis, Options H3 and H4 are ranked better than Options H1 and H2.

- 6.6 With regards to maximising delivery at key sites (under Option H2 and H4), it is recognised that supporting housing would be at some of the most accessible locations in the City (that provide good access to employment opportunities) but further housing development in the city centre could reduce the opportunities for supporting employment development, including office uses, retail and commercial uses. On this basis, the preferred strategy (Option H3) is ranked better than Option H4, and Option H1 is ranked better than Option H2. The overall effects for the economy when maximising housing development within the city centre are uncertain at this stage in the absence of precise alternative employment locations to determine the impact upon economic development strategies.

Town centres

- 6.7 Like the discussion under economy, significant benefits from enhanced city centre connections are associated with the new transport hub at Tipner East and bridge link at Tipner West and Horsea Island East, and Options H1 and H2 which exclude housing development at Tipner West and Horsea Island East and Port Solent could undermine the viability of the proposals, making them less likely of fully realising these benefits. For this reason, Options H3 and H4 are ranked better than Options H1 and H2, and Options H1 and H2 are considered less likely to result in significant positive effects (whilst recognising some uncertainty).
- 6.8 Maximising housing delivery at some of the key sites will continue to support town centres and their long-term vitality. Maximised housing delivery in the city centre would likely benefit retail uses but wider uses are needed to maintain a sustainable mix that promotes vitality. Assuming this will still be achieved, enhanced benefits for town centres are expected under options that maximise housing delivery (Options H2 and H4) which make these options rank marginally better than their counterparts (Options H1 and H3 respectively).

Sustainable transport

- 6.9 All options are pursuing a growth strategy that will impact the road network by introducing new vehicles and adding to congestion. Unlocking opportunities to improve sustainable transport options will therefore be key to reducing the extent of the likely impacts of any growth strategy, including impacts for air quality. In this respect, Options H3 and H4 are ranked better than Options H1 and H2 as they provide greater opportunity to secure infrastructure improvements - the new bridge link at Tipner West and Horsea Island East.

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This would improve access for both new and existing residents west of the city centre.

- 6.10 Whilst it is expected that options which avoid development in FRZ2/ 3 (Options H1 and H2) will support measures to improve sustainable transport access and active travel opportunities the benefits are not expected to be as significant as the new infrastructure proposals associated with Tipner West and Horsea Island East (and ultimately the housing element of this proposal is key to ensuring viability and leveraging in private sector investment). Minor positive effects are therefore considered more likely under these options.
- 6.11 Development will also need to consider access and egress from strategic sites located near to flood risk areas and ensure sustainable transport connections are free from flood risk and maintained in times of emergency.
- 6.12 With regards to increasing housing delivery at certain sites, these sites, particularly at the city centre, are accessible locations that can support sustainable transport choices including active travel options. Additional housing in these areas is likely to improve the viability of supporting infrastructure improvements and get more people using sustainable transport options to improve the viability of these options. Increasing housing delivery at appropriate locations is therefore viewed positively, and these options (Options H2 and H4) are ranked better than their counterparts (Options H1 and H3 respectively) – whilst Options H3 and H4 ranked best overall.

Climate change, flood risk, and coastal change

- 6.13 With regards to flood risk, it is recognised that a key element of the new proposal at Tipner West and Horsea Island East is the delivery of improved flood defences, coupled with decontamination of the site to reduce the potential for leachate pollution into the protected Harbour. With regards to mitigation, this scheme will also deliver a bridge link (linked with a new transport hub at Tipner East) that will improve access to/ from the west. This is recognised as an expensive scheme with extensive mitigation requirements to make the site acceptable for development (and deliver benefits in relation to climate change and flood risk). The scheme ultimately hinges on leveraging further private and public sector investment, and enabling housing development is therefore a vital aspect. The delivery of the Tipner West and Horsea Island East allocation (Options H3 and H4) is considered to have good potential to secure significant positive effects in relation to climate adaptation, mitigation, and flood risk.
- 6.14 Options that avoid development in FRZ2/ 3 are expected to avoid significant impacts arising in relation to flood risk, and neutral effects in relation to the baseline would be expected. Ultimately these proposals (Options H1 and H2) are less likely to positively (and significantly) affect the baseline and are thus ranked lower than Options H3 and H4, including in relation to climate mitigation in the absence of the new bridge link. Despite this, they are still considered to perform well in relation to climate change, particularly by avoiding locating vulnerable development within flood risk zones rather than mitigating these effects.
- 6.15 Increasing housing delivery on key sites could improve the viability for supporting infrastructure improvements assuming that this is not to an extent that it compromises elements such as new open spaces. The key sites subject

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to increases are also accessible locations that can support sustainable transport connections and active travel opportunities. Options to increase housing delivery at key sites (Options H2 and H4) are therefore considered to rank lower than their counterparts (Options H1 and H3 respectively) with Option H4 ranked last given the greater level of development under this option.

- 6.16 With regards to sequential testing, it is recognised that under any option housing needs are still unlikely to be met, thus no deliverable and developable sites within flood zones could be ruled out sequentially as they are all required to deliver homes. Exception testing for sites located within flood risk area should identify mitigation measures that substantially reduce the risk of flooding posed to vulnerable uses.
- 6.17 It is assumed that any development proposal would follow policy requirements in relation to high-quality and sustainable design that improves the resilience of the built environment and local communities.

Housing

- 6.18 All options perform positively against this SA objective by identifying a housing strategy that seeks to meet local housing needs. Given the geographical constraints to growth in Portsmouth, none of the options are considered likely to meet housing needs in full as estimated using the Government's standard methodology. An increasing housing supply is expected under each of the Options with Option H4 delivering the most homes. Options which deliver more homes within the city boundary over the plan period are considered to rank better, with Option H4 ranked first. Furthermore, recognising increasing affordability issues and significant density increases in Portsmouth, it will be important that any option progressed is supported by a wider policy framework that seeks to deliver the right types of homes and housing tenures and promotes high-quality living environments.

Healthy communities

- 6.19 All options seek to identify a housing delivery strategy that can support healthy communities and deliver against their housing needs. However, under-supply is anticipated under any scenario which has implications for healthy communities, recognising that this affects both housing availability and affordability. These effects are likely to be most pronounced under Option H1 followed by Option H2, but it is uncertain whether such effects would be significant given there is a housing supply forecasted over the short to medium term under these options.
- 6.20 All options are progressing development in relatively accessible locations that provide access to services, facilities, employment opportunities, open space, sustainable transport options, and active travel opportunities. Significant positive effects are therefore anticipated. The increasing housing supply under the options (with Option H4 delivering the most homes) is expected to enhance the potential range of accessible homes and provide more local affordable housing options overall, though maximising housing delivery on sites could affect the delivery of wider on-site community benefits which should ultimately be avoided. An increasing housing supply can also enhance positive contributions to reducing deprivation. However, Options H3 and H4 will place vulnerable uses (housing) within flood risk areas potentially placing these new

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communities at risk. Mitigation will be required to reduce this risk. However, the development proposed in FRZ2/ 3 at Tipner West and Horsea Island East is expected to deliver flood betterment schemes that extend the site and will improve community resilience (for existing communities) in the longer-term. The new flood defences at Tipner West will also provide protection for the existing community of Stamshaw in the north west of Portsea Island.

- 6.21 Avoiding the delivery of enabling housing development at Tipner West and Horsea Island East (Options H1 and H2) and further development at Port Solent, would undermine the viability of the Tipner West and Horsea Island East allocation, which seeks to deliver multiple community benefits (new flood defences, a new bridge link, significant new open space, and a marine employment hub). On this basis, Options H3 and H4 which include a housing element to the Tipner West and Horsea Island East scheme, and the Port Solent key site, are considered to rank better than options that exclude these (Option H1 and H2). But this is on the assumption that vulnerable uses in flood risk areas will be supported with sufficient mitigation measures to reduce or alleviate flood risk.

Historic environment

- 6.22 An increasing housing supply under the options (with Option H4 delivering the most homes) is considered to have the potential to increase risks for the historic environment – by means of more development, in more locations, potentially affecting more aspects of the baseline.
- 6.23 There are designated heritage assets that have the potential to be impacted by development at some of the key sites which are added to Options H3 and H4. This may generate increased need for mitigation to reduce effects on the significance of assets and makes these options (Options H3 and H4) rank lower than Options H1 and H2 (which have fewer development locations). Option H4 is ranked lowest as the increased housing delivery at key sites increases the potential pressures on designated assets, particularly within the City Centre. Overall, the lowest growth option (Option H1) is ranked best. The potential for some negative effects under all options are possible at this stage, however it is the role of the development management process and site-specific assessment to identify, avoid and mitigate any negative impacts that may arise on heritage assets. In consequence, uncertainty is concluded. Residual effects will need to be informed by detailed site proposals and mitigation strategies as appropriate.

Urban design

- 6.24 With regards to urban design, it is expected that any option could deliver high-quality design proposals that accord with design principles likely to be set by the Local Plan. This makes it hard to meaningfully differentiate between the options.
- 6.25 Most notably, the relative viability position of the Tipner West and Horsea Island East allocation is improved (to a point where delivery is more feasible) by allowing for enabling housing development, and this has implications for good design, promoting a new and improved high-quality environment in the west of the city that can support growth needs. The site would include land remediation and includes an extensive area of open space at Horsea Island, with dedicated ongoing management programmes in place this will likely

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positively impact upon the baseline. On this basis, Options H3 and H4 are ranked better than Option H1 and H2, but no significant effects are predicted. Additionally, the increased housing delivery on certain sites has implications for high-quality design by its higher density development proposals, accordingly these options (Options H2 and H4) are ranked less preferably to options that do not increase housing delivery at certain sites (Options H1 and H3).

Natural environment

- 6.26 Similar to the historic environment, an increasing housing supply under the options (with Option H4 delivering the most homes) is considered to have increasing risks for the natural environment – by means of more development, in more development locations, affecting more aspects of the baseline.
- 6.27 A premise for biodiversity net gain will assist in avoiding significant effects arising at most development locations, but the HRA concludes that the Tipner West and Horsea Island East allocation will have adverse effects on national and internationally designated biodiversity sites (with or without the housing element of the proposal) – relating to direct habitat loss. On this basis, significant negative effects are concluded as likely under all options.
- 6.28 Despite this, positive effects are also expected from the land remediation, green infrastructure enhancements, and flood mitigation measures proposed at Tipner West and Horsea Island East. The direct support for improved soil and water quality is likely to benefit habitats. Without the new flood defences and decontamination work, the land at Tipner West is likely to be inundated by the sea and contaminant leachate would enter into the protected Harbour, with a significant adverse impact on the natural environment.
- 6.29 There are key habitats and ecological connections that will need to be protected and enhanced across the development locations though most notably, a significant proportion of housing development is directed towards brownfield opportunities. Despite this, there is expected to be increasing mitigation requirements under the increasing housing supply options and this is reflected in the ranking of the options. Overall, the lowest growth option is ranked best.

Natural resources

- 6.30 An increasing housing supply under the options is expected to place increasing levels of pressures on natural resources (including waste generation) and this is reflected in the ranking of options (With Option H4 ranked last). Notably, a significant proportion of the housing supply strategy is underpinned by brownfield development, which will positively support the efficient use of land but as the level of growth increases, so do the expected pressures on water resources and quality. Whilst no significant impacts are predicted site-level mitigation is likely to be required.
- 6.31 The Tipner West and Horsea Island East proposal has the potential to positively affect the baseline through its flood defence and land remediation proposals that will in turn support water quality. These effects are unlikely under options H1 and H2, as they are likely to be viable only with the enabling development of housing to be provided under Options H3 and H4. Overall, no significant effects are considered likely at this stage.

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Employment growth options

6.32 Chapter 5 establishes two separate sets of employment growth options relating to office floorspace development and industrial/ warehousing floorspace development.

Office development

6.33 The following three options relating to office floorspace development are identified for the purposes of SA:

- **Option OF1:** An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
- **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park. (PfSH estimate of need)

| SA objective | | Option OF1: 42,500sqm at Lakeside Business Park | Option OF2: 61,700sqm at Lakeside Business Park and the City Centre | Option OF3: 74,217sqm at Lakeside Business Park and the City Centre |
|--|---------------------|--|--|--|
| 1 (economy) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 3 | 2 | 1 |
| 2 (town centres) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 1 |
| 3 (sustainable transport) | Significant effect? | No | No | No |
| | Rank | 2 | 1 | 1 |
| 4 (climate change, flooding, and coastal change) | Significant effect? | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 |
| 5 (housing) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | = | = | = |
| 6 (healthy communities) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | = | = | = |
| 7 (historic environment) | Significant effect? | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 |
| 8 (urban design) | Significant effect? | No | No | No |
| | Rank | | | |

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| SA objective | | Option OF1: 42,500sqm at Lakeside Business Park | Option OF2: 61,700sqm at Lakeside Business Park and the City Centre | Option OF3: 74,217sqm at Lakeside Business Park and the City Centre |
|-------------------------|---------------------|--|--|--|
| | Rank | = | = | = |
| 9 (natural environment) | Significant effect? | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 |
| 10 (natural resources) | Significant effect? | No | No | No |
| | Rank | = | = | = |

- 6.34 Long-term significant positive effects are considered likely under all three options for the **economy**, **town centres** and **housing** SA objectives. With regards to the economy, it could be considered that as the amount of additional office space increases, as do the benefits for the local economy due to increased employment opportunities (as reflected in the ranking of options). However, the HEDNA highlights that the quality of employment space is more important than quantity, especially given reduced office attendance since the Covid-19 pandemic. Lakeside Business Park performs well in this respect as it is Portsmouth's premier business location, and the allocation will enable it to continue attracting businesses. Therefore, whilst Option OF1 only meets the lower end estimate of need according to the HEDNA, it is considered to perform well as it only focuses growth at Lakeside Business Park. Options OF2 and OF3 deliver additional office space at the City Centre as well as Lakeside Business Park. This means that new employment opportunities will be spread more widely across the city. With regards to town centres and housing, an increase in office space, and therefore an increase in employment opportunities, is likely to support development opportunities for housing and increase footfall in town centres, supporting their vitality and future growth. For this reason, Options OF2 and OF3 perform marginally better in relation to town centres.
- 6.35 Significant positive effects are also considered likely in relation to healthy communities, recognising that unemployment can be a determinant of poor health and the options all provide jobs in accessible locations connected by sustainable transport options.
- 6.36 Minor positive effects are considered likely under all three options for the **sustainable transport**, and **urban design** SA objectives. With regards to sustainable transport, this is because all three options propose additional office space in sustainable locations that are either accessible via active travel (i.e., walking or cycling) or public transport. Options OF2 and OF3 deliver additional office space at both Lakeside Business Park and the City Centre. This means that new employment opportunities will be spread more widely across the city, and therefore more residents are likely to walk or cycle to work, making Options OF2 and OF3 rank marginally better than Option OF1 given the more accessible City Centre development. With regards to urban design, new office space should be well-designed in line with emerging Local Plan policies.

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- 6.37 However, it is recognised that the higher the quantum of the development, the more trips are likely to be generated, including trips by less sustainable modes of transport. This is reflected in the ranking under the sustainable transport objective with Option 1 ranked best overall for the lower quantum of development. Given the development locations are relatively well connected by sustainable transport modes, no significant negative effects are predicted at this stage.
- 6.38 Uncertainty is noted under all three options for the **climate change, flooding, and coastal change, historic environment, and natural environment** SA objectives. With regards to climate change, flooding, and coastal change, this is because whilst both Lakeside Business Park (all options) and the City Centre (Options OF2 and OF3) are currently within Flood Zone 1, in 100 years it is predicted that they could be partially within Flood Zone 2/ 3 (or predominantly within Flood Zone 2/ 3 at Lakeside) so there may be a need for further mitigation. With regards to the historic and natural environment, impacts on heritage assets and the local landscape are largely dependent on the layout and design of development. Due to this, it is difficult to predict effects with certainty. For all three SA objectives, it is considered that as the amount of additional office space increases, as does the potential for significant negative effects. It is also noted that the City Centre (Options OF2 and OF3) is more constrained by heritage assets than Lakeside Business Park (all options). The options are therefore ranked according to the quantum of additional office space they deliver.
- 6.39 No significant effects are predicted under all three options for the **natural resources** SA objective. This is because the delivery of additional office space at both Lakeside Business Park (all options) and the City Centre (Options OF2 and OF3) will largely involve the intensification of brownfield land.

Industrial/ warehousing development

- 6.40 The following two options relating to industrial/ warehousing floorspace development are identified for the purposes of SA:
- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need)
 - **Option IF5:** An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (HEDNA top-end estimate of need)
 - **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PfSH estimate of need)

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| SA objective | | Option IF4: net loss (-42,800sqm) | Option IF5: additional 96,300sqm | Option IF6: additional 210,214sqm |
|--|---------------------|-----------------------------------|----------------------------------|-----------------------------------|
| 1 (economy) | Significant effect? | Yes – negative | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 2 |
| 2 (town centres) | Significant effect? | Yes – negative | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 2 |
| 3 (sustainable transport) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 4 (climate change, flooding, and coastal change) | Significant effect? | Uncertain | No | Uncertain |
| | Rank | 2 | 1 | 3 |
| 5 (housing) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 2 |
| 6 (healthy communities) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 2 | 1 | 3 |
| 7 (historic environment) | Significant effect? | Uncertain | No | Uncertain |
| | Rank | 2 | 1 | 3 |
| 8 (urban design) | Significant effect? | No | No | No |
| | Rank | 2 | 1 | 3 |
| 9 (natural environment) | Significant effect? | Uncertain | No | Uncertain |
| | Rank | 2 | 1 | 3 |
| 10 (natural resources) | Significant effect? | No | No | No |
| | Rank | = | = | = |

6.41 Long-term significant positive effects are considered likely under Options IF5 and IF6 for the **economy**, **town centres** and **housing** SA objectives. With regards to the economy, it could be considered that as the amount of additional industrial space increases, as do the benefits for the local economy due to increased employment opportunities. Whilst Option IF6 delivers the highest level of additional industrial space, Option IF5 is considered to perform most favourably as it delivers a more viable level of growth. With regards to town centres and housing, an increase in industrial space, and therefore an increase in employment opportunities, is likely to support development opportunities for housing and increase footfall in town centres, supporting their vitality.

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- 6.42 Significant positive effects for **housing** under IF4 are also expected this option provides the opportunity to repurpose accessible employment land for housing purposes (recognising a lack of housing land supply in the city).
- 6.43 Significant positive effects are also considered likely in relation to **healthy communities**, recognising that unemployment can be a determinant of poor health and the options all provide jobs (or potentially alternatively housing) in accessible locations connected by sustainable transport options.
- 6.44 Conversely, long-term significant negative effects are considered likely under Option IF4 for the **economy and town centres** SA objectives. This is because this option will lead to a net loss of industrial/ warehousing space, which will likely weaken the economy, and decrease footfall in town centres, potentially contributing to their decline.
- 6.45 Minor positive effects are considered likely under Option IF5 for the **sustainable transport**, and **urban design** SA objectives. With regards to sustainable transport, this is because this option proposes additional industrial space in sustainable locations that are either accessible via active travel (i.e., walking or cycling) or public transport. In addition, this option delivers additional industrial space across the city, rather than concentrating it in one location, and therefore more residents are likely to walk or cycle to work. With regards to urban design, new industrial space should be well-designed in line with emerging Local Plan policies.
- 6.46 However, it is recognised that the higher the quantum of the development, the more trips are likely to be generated, including trips by less sustainable modes of transport. This is reflected in the ranking under the sustainable transport objective with Option 1 ranked best overall for the lower quantum of new industrial/ warehousing development. Given the development locations are relatively well connected by sustainable transport modes, no significant negative effects are predicted at this stage.
- 6.47 Minor negative effects are considered likely under Option IF6 for the **sustainable transport**, **healthy communities**, and **urban design** SA objectives. This is because the level of additional industrial space proposed under this option is considered unviable and, even if it were to be delivered, would likely lead to a strain on competing uses, transport services and health facilities in the short-term. With regards to urban design, whilst new industrial space is likely to be well-designed in line with emerging Local Plan policies, the level of growth proposed through this option could lead to industrial space dominating parts of the city. Notably, intensification could reduce space for supporting features such as open space and landscaping. This may adversely impact the local environment for residents, especially as industrial space is traditionally utilitarian.
- 6.48 No significant effects are considered likely under Options IF4 for the **sustainable transport**, and **urban design** SA objectives as this option will lead to a net loss of industrial space. However, it is recognised that this option has the potential to support alternative uses at some existing industrial sites, which could be beneficial for these SA objectives. Nevertheless, this is uncertain at this stage.

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- 6.49 Minor positive effects are considered likely under Options IF4 for the **climate change, flooding, and coastal change, historic environment, and natural environment** SA objectives. This is because this option will lead to a net loss of industrial space, which has the potential to reduce flood risk if the space is repurposed into green space, or built-up space that utilises flood risk management measures such as SuDS. A net loss of industrial space under this option could improve the setting and significance of heritage assets and the local landscape. However, as already noted, this is largely dependent on how the industrial space is repurposed, which is uncertain at this stage.
- 6.50 Uncertainty is noted under Options IF5 and IF6 for the **climate change, flooding, and coastal change, historic environment, and natural environment** SA objectives. With regards to climate change, flooding, and coastal change, this is because flood defence mitigation is required to be delivered at Tipner West and Horsea Island East allocation to avoid significant effects arising. With regards to the historic and natural environment, impacts on heritage assets and the local landscape are largely dependent on the layout and design of development. Due to this, it is difficult to predict effects with certainty. For all three SA objectives, it is considered that as the amount of additional industrial space increases, as does the potential for significant negative effects. The options are therefore ranked according to the quantum of additional industrial space they deliver.
- 6.51 No significant effects are predicted under all three options for the **natural resources** SA objective which broadly perform on par with each other. This is because Option IF4 will lead to a net loss of industrial space, whilst the delivery of additional industrial space under Options IF5 and IF6 will largely involve the intensification of brownfield land.

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Policy Options (HMOs)

6.52 Chapter 5 establishes the following options for the purposes of SA:

- **Option HMO1:** No additional HMO development (0%) city-wide
- **Option HMO2:** 5% limit within 50m radius of application site
- **Option HMO3:** 5% limit within 100m radius of application site
- **Option HMO4:** 10% limit within 50m radius of application site
- **Option HMO5:** 10% limit within 100m radius of application site
- **Option HMO6:** 15% limit within 50m radius of application site

| SA objective | | Option HMO1 | Option HMO2 | Option HMO3 | Option HMO4 | Option HMO5 | Option HMO6 |
|--|---------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| 1 (economy) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 3 | 3 | 3 | 2 | 1 |
| 2 (town centres) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 3 | 3 | 3 | 2 | 1 |
| 3 (sustainable transport) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 4 (climate change, flooding, and coastal change) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 5 (housing) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 2 | 2 | 1 | 1 | 2 |
| 6 (healthy communities) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 1 | 1 | 2 | 2 | 3 |
| 7 (historic environment) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 8 (urban design) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 9 (natural environment) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 10 (natural resources) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |

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| SA objective | Option HMO1 | Option HMO2 | Option HMO3 | Option HMO4 | Option HMO5 | Option HMO6 |
|--------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Rank | = | = | = | = | = | = |

- 6.53 Effects in relation to **sustainable transport, climate change and flood risk, historic environment, urban design, natural environment, and natural resources** are expected to be neutral for all options given that under any option, the development location should remain the same (as the options relate to housing tenure/ type). The options cannot be readily differentiated between under these SA objectives and are thus considered to rank on par with each other.
- 6.54 All options seek to place a limit to the concentration of HMOs in any given area. HMOs form an important element of housing supply, generally providing affordable housing options for those on lower incomes, those who do not wish to live independently, and those who need short-term tenancies in an area (e.g., contractors). Typically, this tenure attracts students and young professionals in Portsmouth. 42% of students in Portsmouth reside in HMOs and are still experiencing affordability issues.
- 6.55 The existing Supplementary Planning Document (SPD) that the Council has produced specifically in relation to HMOs¹⁸ seeks to ensure a balance of uses so that HMOs are not heavily concentrated in any given area. It identifies that *“a community will be considered to be ‘imbalanced’ where more than 10% of residential properties within a 50m radius of the area surrounding the application property are already in HMO use.”* The HEDNA identifies that whilst it is difficult to know the full extent of HMO use in the city (given smaller HMOs do not require licenses), it already contains a high concentration of HMOs, and it is therefore assumed that concentration levels above 10% in a 50m radius will lead to increased levels of HMOs in the city, and potentially ‘imbalanced’ communities. The main implications for the options therefore relate to the **healthy communities** and **housing** SA topics and could lead to minor negative effects, as discussed below. Significant negative effects are considered less likely given that all options are seeking to place an overall cap on concentration levels to some degree. These effects are most likely to be concentrated within the wards that already experience high levels of HMOs (Central Southsea, St Thomas, and St Jude).
- 6.56 Conversely, the data shows that there is a need for this type of affordable housing (within the student population and young professionals), so a 0% (no additional HMO development – Option HMO1), or more stringent cap (Options HMO2 and HMO3 - 5% limit within 50m/100m radius of application site) could lead to minor negative effects by restricting opportunities to meet the additional HMO needs arising over the plan period. Furthermore, it is likely that these negative effects would be experienced more widely across the city, with the benefits of further restrictions likely to arise at the wards that already have high levels of HMOs (as above – Central Southsea, St Thomas, and St Jude). Options HMO1, HMO2, and HMO3 could essentially create a cap on new HMO development in areas where they are already most concentrated. Due to the need for HMOs as a type of housing that meets affordable housing need, HMO

¹⁸ [HMOs – Ensuring mixed and balanced communities SPD \(2019\)](#)

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development would be likely to disperse to nearby areas, where concentrations are currently lower.

- 6.57 Most options therefore have the potential to lead to minor negative effects in relation to the housing and healthy communities topics, but Options HMO4 and HMO5 align with the existing evidence that supports a level of HMO development as a form of affordable housing that meets diverse housing needs, and are more likely to continue baseline trends with neutral effects. HMO4 and HMO5 therefore rank highest with regard to the housing topic, with HMO2 and HMO3 ranked in second place and HMO1 and HMO6 considered the lowest ranking options, due to their potential to adversely affect a balanced housing supply in the city.
- 6.58 However, Options HMO2 and HMO3 are ranked first when it comes to healthy communities, by avoiding potential negative social and amenity impacts of higher concentrations of HMOs and ‘imbalanced’ communities. Options HMO4 and HMO5 are considered to rank marginally better than Option HMO1 and HMO6 as the predicted minor impacts are likely to be more focused/ less widely dispersed across the city or beyond.
- 6.59 Minor indirect benefits could be associated with options that promote increased levels of HMOs in the city (Options HMO5 and HMO6) in relation to the **economy** and **retail** themes, given this type of housing provides more adults within a single household spending in local town centres or potentially being employed locally. Whilst no significant effects are anticipated, this makes Options HMO5 and HMO6 rank marginally better than the remaining options (in relation to these SA topics), with Option HMO6 ranked first overall (given the higher levels of HMOs permitted under this option).
- 6.60 Minor indirect benefits could be associated with options that promote increased levels of HMOs in the city (Options HMO5 and HMO6) in relation to the **economy** and **retail** themes, given this type of housing provides more adults within a single household spending in local town centres or potentially being employed locally. Whilst no significant effects are anticipated, this makes Options HMO5 and HMO6 rank marginally better than the remaining options (in relation to these SA topics), with Option HMO6 ranked first overall (given the higher levels of HMOs permitted under this option).

Policy Options (First Homes)

6.61 Chapter 5 establishes the following three options for the purposes of SA:

- **Option FH1:** 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH2:** 10% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH3:** 25% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.

| SA objective | Option FH1: 0% | Option FH2: 10% | Option FH3: 25% |
|--------------|---------------------|-----------------|-----------------|
| 1 (economy) | Significant effect? | No | No |

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| SA objective | | Option FH1: 0% | Option FH2: 10% | Option FH3: 25% |
|--|---------------------|----------------|-----------------|-----------------|
| | Rank | 1 | 2 | 3 |
| 2 (town centres) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 3 (sustainable transport) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 4 (climate change, flooding, and coastal change) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 5 (housing) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 6 (healthy communities) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 7 (historic environment) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 8 (urban design) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 9 (natural environment) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 10 (natural resources) | Significant effect? | No | No | No |
| | Rank | = | = | = |

6.62 Effects in relation to **town centres, sustainable transport, climate change and flood risk, historic environment, urban design, natural environment, and natural resources** are expected to be neutral for all options given that under any option, the development location remains the same (as the options relate to an element of affordable housing delivery onsite). The options cannot be readily differentiated between under these SA objectives and are thus considered to rank on par with each other.

6.63 The options are considered most likely to affect social objectives, predominantly the **housing** objective. In relation to housing, the HEDNA identifies that policy compliant applications would currently be expected to deliver a minimum of 25% affordable housing as First Homes, but the evidence indicates that in Portsmouth, the gap in incomes needed to buy and rent a home in the city is quite small and would suggest a very limited 'need' for First Homes. It is also possible that provision of First Homes could squeeze out other forms of low-cost home ownership (such as shared ownership) schemes.

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The HEDNA evidence suggests a much lower target than 25% as being appropriate – potentially as low as 0% only allowing First Homes where they are needed to support viability. This reflects the evidence which suggests that rented affordable housing is likely to be needed by those with more acute needs and fewer choices in the housing market. Considering the options, minor positive effects are considered most likely under any option given the support for affordable housing delivery, but the options are ranked to reflect the findings of the HEDNA, with lower percentage First Home contributions being ranked more highly than higher percentages.

6.64 By extension, findings in relation to **healthy communities** are expected to be similar to those in relation to housing (with effects being minor positive in nature and options ranked according to the findings of the HEDNA), given that access to high-quality affordable homes (of the right type and tenure) form a key part of balanced communities and affordable housing can target the needs of those generally more deprived and/ or with protected characteristics.

6.65 Minor indirect effects can be drawn in relation to the **economic** SA objective and ensuring the right mix of housing types and tenures can ultimately support a growing housing economy, thus the options are also ranked according to the HEDNA findings.

Policy Options (Biodiversity net gain)

6.66 Chapter 5 establishes the following two options for the purposes of SA:

- **Option BNG1:** require 10% net gain in all developments.
- **Option BNG2:** require 20% net gain in all developments.

| SA objective | | Option BNG1: 10% | Option BNG2: 20% |
|--|---------------------|------------------|------------------|
| 1 (economy) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 2 (town centres) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 3 (sustainable transport) | Significant effect? | No | No |
| | Rank | = | = |
| 4 (climate change, flooding, and coastal change) | Significant effect? | Yes - positive | Yes - positive |
| | Rank | 2 | 1 |
| 5 (housing) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 6 (healthy communities) | Significant effect? | No | No |
| | Rank | 2 | 1 |

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| SA objective | | Option BNG1: 10% | Option BNG2: 20% |
|--------------------------|---------------------|------------------|------------------|
| 7 (historic environment) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 8 (urban design) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 9 (natural environment) | Significant effect? | Yes - positive | Yes - positive |
| | Rank | 2 | 1 |
| 10 (natural resources) | Significant effect? | No | No |
| | Rank | 2 | 1 |

6.67 Effects in relation to the **economy and town centres** are predominantly indirect and relate to built environment settings. Biodiverse spaces support the quality of neighbourhoods, and spaces where people congregate. High-quality spaces, where people enjoy working and visiting attract continued inward investment and productive economies. Both options under consideration are likely to support such indirect minor benefits for the economy and town centres, and Option BNG2 is ranked marginally better than Option BNG1 given the enhanced level of (green) infrastructure development.

6.68 With regards to **sustainable transport** neither option is considered likely to lead to significant effects and there is little to differentiate between the options. Biodiversity enhancements can benefit active travel uptake and connections, but these effects are considered limited to onsite measures under these options and negligible in this respect.

6.69 There are numerous **climate considerations** but in the context of BNG, effects are likely to be highly positive in nature. As highlighted by the NPPF (2023), well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk and coastal change, notably 20% BNG could lead to improved surface run off rates and reduced surface water flooding). Ultimately, nature-based solutions should be promoted at development sites wherever possible. Whilst both options are considered likely to support significant positive effects, Option BNG2 is ranked higher given the increased (green) infrastructure requirement.

6.70 Effects in relation to **housing** are expected to be positive (albeit minor) given the potential for biodiversity net gain to lead to improved residential environments and supporting public spaces, that are attractive to residents and encourage inward investment. Whilst placing greater infrastructure requirements on developers can affect viability, given the range of net gain solutions available, it is not considered likely that the higher 20% requirement under Option BNG2 would lead to significant impacts on housing delivery. This is supported by evidence¹⁹ that suggest that 20% net gain will not materially affect viability in most cases, and the costs associated with this increase above 10% are often negligible. The evidence demonstrates that biodiversity net gain

¹⁹ CIEEM, 2022 [KNP Assesses 20% Biodiversity Net Gain Requirement](#)

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costs are low compared to other policy costs and suggests that in no cases are they likely to be what renders a development unviable. On this basis, Option BNG2 is ranked marginally better than Option BNG1.

- 6.71 Under both options benefits are expected in relation to **healthy communities** recognising that access to nature and healthy ecosystems support healthy lifestyles, and onsite delivery of biodiversity net gain should ensure equitable access in new developments. Ultimately a net gain approach seeks to mitigate any habitat and species loss in development and support a halt in biodiversity decline that will in turn support climate resilience (and the health of communities). Option BNG2 (with higher net gain requirements) provides greater opportunity to facilitate the wider social and wellbeing benefits that healthy ecosystems offer. In the context of Portsmouth, with increasing densities and significant flood risk constraints, natural solutions promoting multiple benefits should be considered at every opportunity, including in drainage and flood risk solutions, urban design, and water and energy harvesting schemes. On the assumption that neither option will significantly affect the viability of development (as evidence suggests), Option BNG2 is ranked more favourably than Option BNG1 in relation to healthy communities, despite minor positive effects being concluded as most likely under both options.
- 6.72 With regards to the **historic environment** minor indirect benefits are associated with biodiversity and green infrastructure enhancements, that improve built environment settings, and by extension benefit the settings of designated and non-designated heritage assets. A higher net gain (Option BNG2) is ultimately ranked more favourably in this respect, but the differences between the options are negligible in terms of effects. This is under the assumption that both options will seek to avoid impacts in relation to archaeology when delivering habitat restoration or new habitat creation schemes. It is also recommended that such schemes are informed by historic landscape character assessments and Conservation Area Appraisals as appropriate.
- 6.73 Effects in relation to **urban design** are also deemed likely to be positive in nature for both options. The National Design Guide²⁰ recognises that nature contributes to the quality of a place and is a critical and integrated component of well-designed places. Well-designed places achieve BNG through well-integrated drainage, ecology, shading, recreation, and food production. The greater this contribution as part of development, the more positive these effects are likely to be. On this basis, both options are likely to lead to minor positive effects and Option BNG2 is ranked better than Option BNG1.
- 6.74 Effects in relation to the **natural environment** are of greatest significance for the options under consideration. It is recognised that the mandatory biodiversity net gain requirement in development is a means to halting biodiversity decline and reversing this trend. Both options are therefore expected to support significant positive effects in relation to biodiversity and the natural environment. With evidence indicating that the cost burden in the increase from 10% to 20% is minimal and unlikely to render a development as

²⁰ [National Design Guide](#) (2021)

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unviable, Option BNG2 is considered for its potential to enhance the residual effects and is thus ranked more favourably than Option BNG1.

6.75 With regards to **natural resources**, biodiversity enhancements have the potential to deliver a range of ecosystem services which will support land, soil, and water resources. These include soil formation; flood and erosion protection; and water quality regulation. Both options are likely to support minor positive effects in this respect and Option BNG2 is ranked marginally higher than Option BNG1 given the enhanced level of (green) infrastructure development.

With respect to air quality, whilst Option BNG1 will provide benefits, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG). In this respect the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution (particulate matter, sulphur dioxide, nitrogen dioxide and ozone). As such, the increased requirement for net gain through Option BNG2 makes this option rank higher overall.

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7. Developing the preferred approach

- 7.1 This section explains the Council's preferred approach, considering the appraisal of reasonable alternatives in Section 6, and bringing it together with available evidence and Council and wider priorities.

Housing growth options

- 7.2 The Council's preferred option is Option H3: Develop additional areas within FRZ2/ 3 reflective of the current plan strategy (NB, this option is expected to boost contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet housing needs in full using the standard methodology).
- 7.3 Option H3 is the preferred approach and is fully evidenced by the comprehensive assessment undertaken in HELAA, which identifies all deliverable and developable sites that could accommodate five or more new homes. Option H3 generates a housing target of 680 net additional homes per year and meets as much of the City's objectively assessed housing need, as set out in the HEDNA (2023) as possible, in line with current national policy. It takes forward all HELAA sites, in flood zones 1, 2 and 3, as either strategic sites, site allocations or identified housing sites in Appendices 2 and 3 of the draft Local Plan. The HELAA provides robust evidence to show that there are no other suitable, available or achievable sites that could be taken forward.
- 7.4 If housing supply relied on sites solely within flood zone 1, Portsmouth would have a more significant deficit of homes delivered over the plan period when assessed against the housing need (using the standard methodology). The inclusion of sites within all three flood risk areas still falls short of meeting Portsmouth's housing need, signifying the importance of their inclusion. There are no sites that have been omitted based on flood risk, and therefore careful consideration is given to management and mitigation of flood risk for the lifetime of development. Detail on how development of these sites will remain safe is provided within planning policy, both in terms of the general approach to flooding in Strategic Policy PLP21: Flooding and with regard to suitable site specific requirements for Strategic Sites and Site Allocations. Further detail can be found within the sequential and exception test contained with the SFRA.
- 7.5 The Council has an agreed Statement of Common Ground with the Environment Agency. This provides details on the agreed approach towards allocating sites within areas risk of flooding, as set out within the sequential and exception test. It also sets out the agreement towards the Council's approach on flood risk when determining development proposals.
- 7.6 This option takes account of a range of other relevant constraints, including nature conservation and transport, where careful consideration is given to impacts and risks, and how they can be mitigated and managed, which informs policy requirements.
- 7.7 This option applies residential yields of the strategic sites and site allocations, and residential density ranges for all other sites in line with the policy approach set in the draft Local Plan (PLP21: Residential Density). It seeks to optimise the use of land as far as possible, taking account of the varying development

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- potential within the City's diverse but confined area, in terms of local character and existing densities, public transport and access to a range of services and with regard to development viability and deliverability. This is supported by evidence contained within the Urban Characterisation Study, the Housing Density Background Paper (2021) and the Viability Study (2024).
- 7.8 Section 5 of this report details potential growth locations in the City and, alongside a number of other strategic sites, Tipner West and Horsea Island East is key to the draft Local Plan's development strategy. It seeks delivery of a marine employment hub alongside a new bridge and flood management measures. The housing element of the site, expected to deliver 814 to 1,250 new homes is enabling development, to achieve viability of marine employment hub while also making an important contribution to meeting housing needs in the City.
- 7.9 The draft Regulation 19 Local Plan gives consideration to responses to the Regulation 18 consultation, which presented three options for Tipner West and Horsea Island East: for an Innovative Sustainable Community, or super-peninsula, including 3,500 - 4,000 new homes and significant land reclamation; regeneration of the existing area; and to maintain the area in its current state ('do nothing'). The option for the super-peninsula received a high level of opposition and would have involved the reclamation of a considerable amount of land from Portsmouth Harbour, which is protected by multiple layers of nature conservation designations. The decision was made by Full Council in 2022 to abandon that scheme along with the do-nothing scenario for the site. The draft Regulation 19 allocation envisages a much reduced form of development and only allows a small amount of reclamation for the marine employment hub if it can be shown to be necessary for project viability or feasibility.
- 7.10 This option is assessed through the Habitats Regulations Assessment (HRA) supporting the Pre-Submission Local Plan. The objective of the HRA is to identify any aspects of the Local Plan that would cause Likely Significant Effects on, or adverse effects on the integrity of, internationally and nationally designated nature conservation sites. The HRA concluded that the Tipner West & Horsea Island East allocation will have adverse effects on the Portsmouth Harbour SPA / Ramsar site, because it will inevitably result in the loss of 0.2ha of inter-tidal protected habitats and (depending on the layout and quantum of development in any future planning application, and depending on evidence of viability and feasibility) may result in the loss of up to 0.5ha intertidal, 0.5ha subtidal, and 3.6ha terrestrial protected habitats. As a result, the policy can only be adopted if certain statutory derogation tests are met. Those tests require there to be: i) no feasible alternative solutions to the allocation; ii) imperative reasons of overriding public interest (IROPI) for the allocation to proceed; and iii) sufficient compensatory habitats available to ensure that there is no residual impact on the integrity on the Habitats sites. The HRA concluded that each of those tests was met. The preferred option provides the flood defences, land decontamination and new marine hub and seeks to minimise harm to the nature conservation designations.
- 7.11 The City Council have worked effectively and continuously with surrounding local authorities in the PFSH area with the intention of meeting unmet housing need under the Duty to Cooperate. The Fareham Local Plan, adopted in 2023

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(for a plan period to 2037) identifies 800 new homes to address unmet housing need in Portsmouth. The Council has formally requested a contribution to meet this unmet need from remaining PfSH neighbours, and will continue to engage on this matter. It will set out the detail of this cooperation in a series of Statement of Common Grounds with each local authority.

- 7.12 Option H3 has positive significant effects in relation to six out of ten Sustainability Appraisal objectives, as detailed in section 6. This includes for housing and healthy communities, economy, town centres and sustainable transport. While there are no significant effects relating to Objective 8. Urban Design, the high ranking of this option links to minor positive effects with regard to delivering good urban design, adequate housing standards and enhancements to local character. Two negative significant effects relate to historic environment and natural environment, but it is considered that these can be adequately mitigated for and managed through the draft Local Plan's policies.
- 7.13 Taking account of the above consideration of how this approach meets sustainability objectives and the findings of the comprehensive evidence base, Option H3 is the most sustainable approach compared to the reasonable alternatives.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

- 7.14 The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:
- **Option H1:** Develop all deliverable and suitable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will fall significantly short of meeting housing needs).
 - **Option H2:** Maximise housing delivery (where possible) on all deliverable and suitable HELAA Sites within FRZ1 (NB, this option is still considered to fall significantly short of meeting housing needs).
- 7.15 Options H1 and H2 are not taken forward as they are expected to fall significantly short of meeting housing need. They also have notably fewer (two out of ten, as opposed to the preferred option's six out of ten) positive significant effects on sustainability objectives. They result in the same number of negative significant effects as the preferred approach. These two options also do not account for the potential role that mitigation and management of risks and impacts that the Council's evidence base provides, which can enable development, as detailed under the preferred approach.
- 7.16 Option H2 would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021) and could lead to an intensity of development on sites within Flood Zone 1 that could bring potential negative impacts to local character, housing standards, and a higher level of demand on local services (e.g. healthcare and schools) and amenities. This would not be considered to fit with the plan's six strategic objectives.

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- 7.17 Accounting for the above, these two options are less sustainable when considered against the preferred approach and other reasonable alternatives (Option H4, detailed below) and are not taken forward.
- **Option H4:** Maximise housing delivery (where possible) on sites, including sites within FRZ2/ 3 (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet housing needs in full using the standard methodology)
- 7.18 The majority of the factors considered in Option H3, the preferred approach, also apply to this option, but this one has the potential to deliver a higher number of new homes than that generated by the preferred approach. A number of sites, as outlined in section 5 of this report, would see an uplift in density and housing numbers. It is considered that this would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021). It could lead to an intensity of Development coming forward in locations across the city that leads to potential adverse impacts on local character, housing standards, historic environment and a higher level of demand on local services (e.g. healthcare and schools) and amenities than the preferred approach. This would have potential to undermine the plan's six strategic objectives.
- 7.19 The balance of positively and negative effects on sustainability objectives is very similar to the preferred approach, but based on the consideration of the above evidence, Option H4 is considered a less favourable option when compared against the preferred approach.

Employment Growth Options

Office development

- 7.20 The Council's preferred approach is Option OF1: An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- 7.21 This follows evidence from the Council's HEDNA, which analyses demand for new office floorspace against different labour demand scenarios. Taking account of the shift to home and hybrid working following the Covid-19 pandemic, reduced levels of employment growth, replacement demand for office development and the trend towards 'flight to quality' where business occupiers and investors seek high-quality modern office space, the HEDNA's preferred alternative labour demand scenario leads to a recommendation for a requirement of around 42,500 sqm of office space. This will be largely delivered through Lakeside Strategic site, alongside smaller net gains through redevelopment of floorspace in the City Centre.
- 7.22 Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities. Employment growth and office occupancy is expected to support increased footfall and expenditure in City's town centres, development opportunities for housing (and jobs for new residents) and increased employment levels leading to better quality of life and health outcomes. However it should be noted that these significant benefits are also evident for the two reasonable alternatives for office development, as listed below.

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Assessment of reasonable alternatives not taken forward in the draft Local Plan.

- 7.23 The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
 - **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park (PfSH estimate of need)
- 7.24 Based on the HEDNA, these two options are not considered to be appropriate as a basis for establishing need for office floorspace.
- 7.25 The HEDNA states that at present there is little demand for office floorspace as shown by the net absorption rate and through discussions with local agents, although these do point to the need for smaller spaces in the City Centre over time, but less certainty regarding larger corporate space. Furthermore, it is important to note that overall, typically office based sectors, such as banking and accountancy, have lower representation in the City in comparison to advanced manufacturing.

Industrial/ warehousing development

- 7.26 The Council's preferred approach is Option IF5: An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites (HEDNA top-end estimate of need).
- 7.27 This option is based on the recommendation of HEDNA's preferred alternative labour demand scenario, which shows 96,300 sq.m should be used for estimating future requirements of manufacturing and warehousing. This preferred option is considered appropriate in light of any need to test economic-led housing need.
- 7.28 This will be delivered at strategic sites, site allocations and through completion of extant permissions. There is also opportunity for intensification and making better use of land in existing industrial areas. The Council's HELAA and the Approach to Employment Land Study by BE Group also highlight intensification opportunities on existing industrial/ warehousing sites for further development, which may come forward during the plan period as windfall development.
- 7.29 Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

- 7.30 The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:
- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need).

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- **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PFSH estimate of need

- 7.31 The HEDNA states that overall the labour demand (alternative) and net completions ranges are considered to be more appropriate whilst still planning positively for growth. These show a range from around 75,500 sq.m to 96,300 sq.m) and the preferred option is at the upper end of this range.
- 7.32 It is clear that a net loss of industrial/warehousing premises in the City would not have a positive effect on the economy of the City. Manufacturing including the maritime and engineering employment sectors related to naval activity and research would not benefit from a net reduction in floorspace.
- 7.33 Equally the provision of a quantum of floorspace that is substantially above need could flood the market and thus not deliver tangible benefits to the economy of the City.

Houses in Multiple Occupation (HMOs)

- 7.34 The Council's preferred option is **Option HMO4: 10% limit within the 50m radius of the application site.**
- 7.35 The Council has for several years sought a balanced approach to the management of HMOs in an effort to create mixed and balanced communities and to ensure that HMOs, with associated social, environmental and amenity impacts, are not heavily concentrated in a given area. The Council's 2019 Supplementary Planning Document on HMOs identifies that "a community will be considered imbalanced where more than 10% of residential properties within a 50m radius of the area surrounding the application property are already in HMO use". This seeks to ensure a mix of housing types and sizes, to meet a range of local housing needs. This threshold has been used successfully in Portsmouth for over five years and is also used by two thirds of local authorities across the country that control HMO proliferation.
- 7.36 It is also important to recognise the role that HMOs play in meeting an element of affordable housing supply, as highlighted in the Council's HEDNA. The preferred approach (Option HMO4) is considered to allow this tenure of housing reasonable scope to meet that need while maintaining balanced communities.
- 7.37 Option HMO6 and to a lesser extent HMO5, while having greater potential to meet an element of need for affordable housing and bring potential for minor positive benefits for economy and town centres sustainability objectives, could lead to a minor negative effects, as highlighted in section 6. These communities would be considered imbalanced, with greater potential for negative social, environmental and amenity impacts on local communities, which would be focused in areas that already have high concentrations of HMOs (Southsea, St Thomas and St Jude). This policy option is not considered an appropriate way forward when considered against the appraised alternatives and is not taken forward the in draft Local Plan.
- 7.38 The assessment in section 6 also shows that applying HMO1 at 0% (no additional HMO development) or a more stringent cap (HMO2 and HMO3 at a 5% limit with 50m or 100m radius of the application site) could lead to minor

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negative effects by restricting opportunities to meet additional need for HMOs over the plan period. It should be noted that application of such a policy would not be expected to prevent demand for HMOs, even with policy compliant delivery of affordable housing (due to the level of need for affordable housing set out in HEDNA) and would simply shift demand for this development elsewhere. A lower limit option (HMO1, HMO2 and HMO3) could essentially cap new HMO development in areas where they are already concentrated (above the 5% limit) and would be likely to lead to a dispersal of HMO development to nearby areas, where concentrations are currently lower. This could lead to (minor) negative effects arising more widely across the City, with any benefits being seen in areas with already high concentrations of HMOs, where any further concentration would be halted.

- 7.39 For this reason, HMO1, HMO2 and HMO3 are not considered a suitable way forward when considered against the alternatives, and are not taken forward in the draft Local Plan.

First Homes

- 7.40 The Council's preferred approach is Option FH1: 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.

- 7.41 This is because there is no evidenced requirement for First Homes in Portsmouth, as part of delivery of affordable housing. Shared ownership is an important and proven route to affordable home ownership due to the lower deposit needed to secure a property compared to First Homes. The Council's HEDNA shows only a small gap in the incomes needed to buy or rent a home in the City, and therefore very little need for First Homes.

- 7.42 Shared ownership is considered to offer a genuinely affordable alternative to market homes which carries greater benefits to people in Portsmouth.

- 7.43 Evidence in the HEDNA and Local Plan Viability Study show there are viability issues in delivering either the Government's recommended threshold of 25% (Option FH3), or a lower level of 10% (Option FH2) of affordable homes as first homes. This carries the risk of detrimentally impacting the delivery of other affordable tenures that the Council deem as priorities, specifically affordable and/or social rent and Shared Ownership. It could leave the Council at risk of having reduced numbers or no affordable homes provided through development, for viability reasons. For this reason, Option FH2 and Option FH3 are not taken forward in the draft Local Plan.

- 7.44 In terms of appraisal against sustainability objectives, all options were neutral (had no significant) effects. The options form a percentage of the affordable housing requirement from development, and development location remains the same. The sustainability objectives most likely to be affected by the different options are housing, healthy communities and the economy, where the preferred approach (Option FH1) has minor positive effects, and lead to it being ranked first under these three objectives. For the reasons outlined above, Option FH1 with its target of 0% First Homes as part of affordable housing provision is considered best suited to meet local housing needs in the City, while ensuring that the draft Plan's wider approach to affordable housing delivery is viable and deliverable.

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Biodiversity Net Gain (BNG)

- 7.45 The Council's preferred approach requires 10% BNG on all developments, with the exception of three predominantly Council owned sites (Portsmouth City Centre North, Somers Orchard and Lakeside) where 20% is required. This is considered to strike a balance between meeting the national BNG requirement (10%) while supporting the Council's aspiration to exceed the minimum requirement on key Council owned sites. It offers a pragmatic solution which will help deliver measurable improvements to biodiversity while remaining achievable and viable.
- 7.46 The City Council is also pursuing the delivery of offsite BNG on City Council owned land in order to maximise the benefits of BNG delivery in the City.
- 7.47 Both options below achieve positive significant effects for sustainability objectives on climate change, flooding and coastal change, and natural environment. While minor positive effects support higher ranking for Option BNG2, adverse impacts on viability (noted below under Option BNG2) and therefore the deliverability of planned development mean that a 10% net gain on all development, with the exception of the three predominantly Council owned sites named above, is considered the appropriate as the preferred approach.
- 7.48 As discussed the preferred approach falls between the two alternative options, which are appraised separately below.

Option BNG1: require 10% net gain in all developments.

- 7.49 The City Council considered this approach as it would be in line with the approach set to become the national requirement from 2024 (schedule 14 of the Environment Act 2021). In March 2023 the elected members of Portsmouth City Council indicated that the Council should look to exceed this minimum requirement on City Council owned land. Taking this target was felt to be insufficiently ambitious and did not show the leadership on BNG and the environment that members considered the Council should be taking with its own landholdings.

Option BNG2: require 20% net gain in all developments.

- 7.50 The City Council considered this approach in order to look at options be more ambitious in regard to BNG and the environment. The Local Plan Viability Study (2024) tested development viability of different levels of BNG in the city and found that at 20% BNG, viability of some schemes may decrease. This option is therefore not being pursued at this time. The City Council recognises that BNG is just one of a suite of tools available to it to deliver environmental benefits in the City. The emerging local Plan PLP38) is also requiring development to meet the five standards set out in the Natural England Green Infrastructure Framework The Urban Nature Recovery Standard comprising; The Urban Nature Recovery Standard; Urban Greening Factor; Urban Tree Canopy Cover Standard; Accessible Greenspace Standards and the Green Infrastructure Strategy.

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Part 2: What are the SA findings at this current stage?

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8. Introduction (to Part 2)

8.1 The aim of this chapter is to present an appraisal of the Local Plan, as to be published under Regulation 19 of the Planning Regulations.

Methodology

- 8.2 The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the ten SA objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Local Plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations.²¹ So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

Adding structure to the appraisal

- 8.5 Whilst the aim is essentially to present an appraisal of ‘the plan’ under each of the SA objectives,²² it is appropriate to also give stand-alone consideration to elements of the Plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct elements of the Plan. Within these narratives, specific policies are referred to only as necessary (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

²¹ Environmental Assessment of Plans and Programmes Regulations 2004

²² Regulations require simply an appraisal of ‘the plan’.

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9. Appraisal of the Local Plan

9.1 The appraisal of the Draft Plan is presented under the ten SA objectives established through scoping (see **Table 3.1**). For each objective the spatial strategy is explored followed by the city-wide policies. Cumulative effects are also explored before a conclusion is reached. Strategic sites and site allocation policies do not repeat city-wide policies so all sections should be read in conjunction.

SA-1: Building a strong, competitive economy in Portsmouth

Commentary on the spatial strategy

9.2 Economic forecasting, taking account of the city's growth aspirations, sectoral strengths and past employment land take up, has informed the economic growth strategy for the Plan. **Policy PLP25** (Employment Target) outlines that the Council will make overall provision for at least 138,429m² of new employment floorspace during the plan period (2020-2040). This will include 58,645m² of office floorspace (class E); 15,270m² of research and development / industrial processes floorspace (class E); and 64,514m² of manufacturing / warehousing floorspace (class B2 / B8).

9.3 Employment and/or commercial floorspace will be provided across five of the seven strategic sites and at one site allocation as follows:

- **Tipner West & Horsea Island East** will deliver a marine hub with a working quayside and up to 58,000m² of marine employment floorspace (classes E, B2 and B8). This will create new jobs in this key growth sector of the economy and capitalises on opportunities associated with the deep water access provided here.
- **Tipner East** will deliver 716m² of commercial floorspace (classes E, F1 and F2), alongside 840m² ancillary commercial uses at a new transport hub. The development is expected to improve sustainable transport connections with the centre, to better unlock both this site and Tipner West & Horsea Island.
- **Lakeside North Harbour** will deliver 50,000m² of new office floorspace (class E). Most of this will be delivered through intensification of the site with the redevelopment of a proportion of the extensive surface level car parking on the site. Policy PLP5 (Lakeside North Harbour) states that if a robust marketing campaign of at least twelve months, its scope having been agreed in advance by the local planning authority, clearly demonstrates that there is insufficient market demand for new offices at this location, development proposals for other commercial uses that complement the existing office park will be allowed. This will allow flexibility in economic uses over the plan period, recognising that office working patterns continue to change in the wake of the pandemic.
- **Portsmouth City Centre** will deliver 20,000m² (gross – 1,546m² net) of office floorspace. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they enhance the

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range of commercial uses in the City Centre. It also states that proposals falling within the City Centre Commercial Area should include town centre uses at ground floor level.

- **Fratton Park & the Pompey Centre** will deliver an expansion to the football stadium to increase the capacity from 21,000 to 26,000-30,000. It will also include a supporting hotel (approximately 145 rooms) and mixed conference and event facilities.
- **Land West of Portsdown Technology Park** is also allocated for 12,500m² of commercial floorspace (as a site allocation).

- 9.4 Provisions are therefore targeted in the most accessible areas of the city or at strategic locations that support key economic growth sectors. Additionally, the St James and Langstone Campus site (Strategic Site policy PLP8) is allocated to deliver new educational facilities that support improvements to the educational and skills development offer in Portsmouth.

Commentary on city-wide policy provisions

- 9.5 Alongside the new allocations discussed above, existing employment land is safeguarded through **Policy PLP26** (Safeguarding Employment Land). The policy encourages proposals for the redevelopment of existing employment premises that provide improved employment accommodation, make more efficient use of land, and provides a similar number of jobs. Development proposals for the change of use of land / premises from employment purposes to non-employment purposes will only be permitted where the land / premises is not fit for purpose for employment. In such cases, the policy prioritises other commercial uses.
- 9.6 Additionally, **Policy PLP27** (Employability & Skills) seeks to support a strong local workforce. The policy supports development proposals which, at both the construction and occupation stages of the scheme, a) raise local skill levels and increase employability; b) tackle skill shortages in existing and potential business sectors; c) address barriers to employment for economically inactive people; and d) provide or contribute to childcare facilities within or near employment sites.
- 9.7 **Policy PLP28** also supports the growth and development of identified centres in Portsmouth's Town Centre Hierarchy which will continue to contribute to a thriving economy and continued economic investment in these areas.
- 9.8 **Policy PLP30** (Cultural and Visitor Economy) supports development proposals that maximise the potential of the cultural and visitor economy and drive forward culture led regeneration. Such opportunities are sought to be maximised in the centres identified in the town centre hierarchy, particularly the Cultural Quarter and the Core Commercial Area of the City Centre. Development proposals for culture, leisure, entertainment, visitor attractions, and accommodation and creative industries will only be permitted where they meet the criteria set out within the policy.
- 9.9 Furthermore, the Local Plan seeks to deliver the ambitious growth targets set for the City in the Portsmouth Economic Development and Regeneration Strategy including 7,000 new jobs. **Policy PLP50** also requires appropriate

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contribution to supporting infrastructure which includes educational infrastructure development needs.

Cumulative effects

9.10 The economy of Portsmouth is of sub-regional importance, with the International Port, naval presence and key sectors in defence, aerospace, and advanced manufacturing and technology, as well as tourism, cultural, digital, and creative industries stemming from the city's maritime influence. The support for economic growth and access to training and education is considered likely to lead to **cumulative positive effects** in the wider sub-region.

Conclusions

9.11 The spatial strategy and policy provisions of the draft Plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall **significant positive effects** are considered likely as a result.

SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

Commentary on the spatial strategy

9.12 **Policy PLP28** (Town Centres) supports development proposals that contribute towards the growth and development of identified centres in Portsmouth's Town Centre Hierarchy. It outlines that development proposals should provide main town centre uses within the city, town, district, local and neighbourhood centres that contribute positively to the function, vitality, and viability of the centres. Policy PLP28 states that the Core Commercial Area should be promoted and enhanced as the heart of the centre. It will be the focus for retail, commercial, leisure, culture, civic and service users, with active street frontages encouraged at ground floor level.

9.13 The ways in which the strategic sites and site allocations will contribute towards the vitality of centres in Portsmouth are outlined below:

- **Tipner West & Horsea Island East, Tipner East, Lakeside North Harbour and Horsea Island Open Space** will together contribute to the vitality of Tipner, Horsea Island and Cosham through mixed-use development. Notably, Tipner West & Horsea Island East will include shops selling essential goods, including food, where the shop's premises do not exceed 280m².
- **Portsmouth City Centre** will strengthen the identity and vitality of the city centre by delivering new homes, business premises, social / leisure venues, and community facilities. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted if they encourage and support culture, arts, civic and leisure uses that add to the area's distinctiveness as the cultural, community and civic heart of the city centre.

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- **Fratton Park & the Pompey Centre** will contribute to the vitality of Fratton by regenerating the area around the football stadium. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development must incorporate active frontages and entrances that promote activity and successfully engage with the public realm particularly along the off-road pedestrian and cycle route and in other appropriate locations.
- **St James' & Langstone Campus** will deliver medical facilities, educational facilities, and recreation, sports and other community facilities, contributing to the vitality of this part of Portsmouth.
- **Land West of Portsdown Technology Park**, which is allocated for 12,500m² of light industrial/ Research and Development floorspace, will contribute to the vitality of Paulsgrove.

Commentary on city-wide policy provisions

- 9.14 In addition to the strategic sites and site allocations discussed above, **Policy PLP29** (Small Local Shops) supports development proposals for small local shops or services outside the City, town, district, local and neighbourhood centres if they meet the criteria set out within the policy. This includes, but is not limited to, the requirement for the shop to primarily sell essential goods and provide services that meet day-to-day shopping and service needs, such as food, to visiting members of the public.
- 9.15 Also of relevance, **Policy PLP49** (Public Realm) supports development proposals that consider opportunities to enhance the public realm in their design. This is to ensure that the public realm is safe, healthy, accessible for all, inclusive, multifunctional, attractive, well-connected, legible, and easy to maintain, and that it relates to the local, cultural, and historic context. Public realm enhancements will ultimately boost user experience and support long-term vitality at town centres.
- 9.16 Finally, **Policy PLP52** (New & Existing Community & Leisure Facilities) is in place to ensure that development proposals for new and/or expanded community and leisure facilities are accessible and inclusive to the local communities it serves.

Cumulative effects

- 9.17 The city has a wider draw as a major cultural, commercial and tourism centre for the sub region. The suggested improvements are likely to support the long-term vitality of centres in Portsmouth, particularly within the City Centre which forms much of the draw for tourism and culture. **Positive cumulative effects** are considered likely overall.

Conclusions

- 9.18 The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, **significant positive effects** are anticipated overall.

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SA-3: Promoting sustainable transport in Portsmouth

Commentary on the spatial strategy

- 9.19 Portsmouth's relatively compact size lends itself to walking and cycling and it is well connected to the wider region and to London and Europe by rail, ferry, and road. Sustainable transport is a key consideration for Portsmouth in future growth, reflecting the context of a climate emergency, issues with poor air quality, and the strategic transport network in Portsmouth dominated by its maritime influences. Alongside many other busy cities around the UK, Portsmouth has been identified as a city that needs to reduce air pollution levels as quickly as possible. In Portsmouth, the main pollutants are principally the products of combustion from road traffic – mainly nitrogen dioxide (NO₂). There are currently five Air Quality Management Areas (AQMAs) predicted to exceed the annual NO₂ National Air Quality Objective (NAQO) and the Council declared a charging Clean Air Zone (CAZ) in 2021. The CAZ has seen 94% of monitored areas comply with air quality standards. Despite this, government assessments reveal a critical need for it to be continued as data reveals persistent challenges in specific locations. There are three areas that continue to have pollution levels above the limits set by Government and a further nine that also continue to be at risk of exceeding. PCC are therefore working in collaboration with the Joint Air Quality Unit (JAQU) to understand why success was not achieved when expected.
- 9.20 The merits and constraints associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to positively impact this objective and address constraints, are outlined below:
- **Tipner West & Horsea Island, Tipner East and Horsea Island Open Space** are located immediately adjacent to the M275 motorway at the northwest part of Portsea Island. Tipner West and Tipner East are in proximity to the Portsmouth AQMA No. 11 which covers a section of the M275 motorway to the south. Policy PLP3 (Tipner West & Horsea Island East) outlines that a segregated bus way between Tipner West and Horsea Island via a new bridge and on to Port Solent will be established and operated. Meanwhile, Policy PLP4 (Tipner East) outlines that the development of a new multi-modal transport hub for the city is a key component of the vision for Tipner East. Both policies outline that development proposals will be permitted provided that they:
 - Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek.
 - Incorporate car-free streets wherever feasible with reduced car parking standards and enhanced cycle parking with 'Mobility as a Service' and sustainable transport modes prioritised.
 - Improve off-road pedestrian and cycle provision.
 - Provide safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network; and

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 - Safeguard the routes of the Pilgrims Trail, the King Charles III England Coast Path and National Cycle Route 22 which pass through Tipner East (Policy PLP4 only).
 - Deliver or contribute proportionately to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/ or Infrastructure Delivery Plan.
- **Lakeside North Harbour** is bound by the strategic road network; the M27 to the south, A27 to the east and north, and M275 to the west. A shared footpath / cycle way runs to the north of the site, linking it to the city and the wider area, and a shuttle bus runs to the nearby Cosham District Centre, where Cosham Railway Station is located. To promote sustainable modes of travel to and from the site, the Plan states that all development proposals to expand the business offer must safeguard and where possible enhance pedestrian and cycle links to the City Centre and Cosham. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that:
 - Effective access arrangements are made that are safe and suitable for all users. A new secondary access point at Lakeside to be provided on to the Western Road (A27) in accordance with the general arrangement plan of the Strategy Transport Assessment or such alternative as may be developed and agreed with PCC Highways.
 - A Travel Plan is made to minimise car use by current and prospective occupants of Lakeside and to maximise use of sustainable modes of transport.
- **Portsmouth City Centre** extends from Hope Street in the north to Guildhall Walk and Winston Churchill Avenue to the south. The site contains Portsmouth & Southsea Railway Station. However, a railway viaduct forms a physical barrier to the area to the south. It overlaps with Portsmouth AQMA No. 11 in the north and Portsmouth AQMA No. 7 in the south. Policy PLP6 (Portsmouth City Centre) outlines that development within the Station Road Regeneration Area should contribute to improved connectivity within the City Centre. In addition, Policy PLP6 outlines that development proposals will be permitted if they:
 - Improve pedestrian and cycle connectivity to the surrounding residential areas.
 - Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritised.
 - Ensure air quality in adjoining AQMAs is not worsened; and
 - Provide a Travel Plan to demonstrate how it is contributing to a shift to sustainable modes of transport in the City Centre.
- **Fratton Park & the Pompey Centre** is in proximity to Fratton Railway Station and is well served by the bus network. However, the existing road layout and location of the railway line prevent easy pedestrian and cycle movements to and throughout the site. It is also adjacent to Portsmouth AQMA No.9 to the east. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that an appropriate off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park shall be provided

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with wider public realm improvements. Policy PLP7 also outlines that development proposals will be permitted provided that:

- An appropriate, accessible off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park is provided.
 - Effective access arrangements are made that are safe and suitable for all users; and
 - A Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures, and identify opportunities to implement effective sustainable transport initiatives.
- **St James' & Langstone Campus** is located away from the primary road network. Policy PLP8 (St James' & Langstone Campus) outlines a Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures, and identify opportunities to implement effective sustainable transport initiatives. Policy PLP8 also outlines that development proposals will be permitted if they:
 - Provide safe, permeable, and convenient north-south pedestrian and cycle links from Locksway Road to Longfield Road and across the wider site (St James).
 - Provide off-site highway network improvements (St James).
 - Retain and enhance the north-south bus / cycleway connection along Furze Lane (Langstone Campus).
 - Provide safe accessible off-road walking and cycling routes through the site are provided, linking areas to the north and south (Langstone Campus).

9.21 Five of the six sites allocated through the draft Plan are all located in sustainable locations, particularly **Somers Orchard** and **Former St John's College Southsea**, which are in/ near the city centre. Fraser Range is considered slightly more distant. In terms of non-strategic sites, whilst site-specific policies play a role, it is considered that the draft city-wide policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising from development.

Commentary on city-wide policy provisions

9.22 Air quality is primarily addressed through **Policy PLP35** (Air Quality and Pollution), which states that planning permission will only be granted for development proposals when it can be demonstrated, in a proportionate manner, that they will not contribute to and will not be subject to unacceptable levels of pollution which cannot be mitigated.

9.23 The focus of transport is **Policy PLP47** (Movement and Transport), which states that development proposals will be permitted where they help deliver a people centred travel network that prioritises walking, cycling, public and shared transport, in line with Local Transport Plan 4 (LTP4). The policy

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supports growth in highly accessible locations with good access to public transport services and other sustainable transport. It also addresses safety by ensuring that development proposals give priority to the needs of pedestrians, cyclists, users of mobility aids, and other non-motorised forms of transport.

- 9.24 **Policy PLP48** (Access and Parking) states that development will be permitted where it is located and designed in such a way that it seeks to discourage car use and encourages travel by other modes, unless off street parking provision can be justified. This could include car free development. Development proposals should incorporate charging points for electric vehicles (EVs) and secure cycle storage and encourage car share schemes.
- 9.25 More broadly, **Policy PLP49** (Public Realm) supports development proposals that consider opportunities to enhance the public realm in their design. This includes encouraging walking and cycling and easing the movements of pedestrians, cycles, cargo-bikes, scooters, pushchairs, wheelchairs, mobility scooters and vehicular traffic within the site and to wider focal points within the city. In addition, **Policy PLP50** (Infrastructure Delivery) is in place to ensure that development proposals include suitable infrastructure provision.

Cumulative effects

- 9.26 The Plan recognises and supports wider city and sub-regional aspirations for transport, including LTP4. The draft Plan supports the provisions of the city's transport plan which implemented a Clean Air Zone in Portsmouth in 2021. The Plan also provides wider support for air quality, particularly through focused efforts to improve sustainable transport connections and reduce the need to travel. On this basis, **positive cumulative effects** are considered likely.

Conclusions

- 9.27 Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, **long-term minor positive effects** are considered likely overall.

SA-4: To tackle climate change, flooding and coastal change in Portsmouth

Commentary on the spatial strategy

- 9.28 The construction of new homes and the increase in number of dwellings in the city will ultimately increase pressures on existing highways infrastructure and affect air quality and overall emissions. The spatial strategy seeks to maximise opportunities to facilitate growth in sustainable locations, which are supported by infrastructure and sustainable transport choices, and which reduce the need to travel (see SA objective 3).
- 9.29 Focusing growth at strategic sites at the City Centre and other town centres, the Plan presents opportunities to incorporate strategic measures to address climate change and per capita emissions, such as district heating systems, new

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open spaces, sustainable travel opportunities, and strategic green infrastructure provisions. In terms of accessibility, sites within the City Centre, Fratton, and Cosham are located within 800m of a train station and considered overall as highly accessible locations – particularly within the City Centre.

9.30 Seeking higher residential densities in areas of high accessibility such as transport nodes / corridors and retail areas is considered to contribute positively towards meeting climate change objectives, supporting the vitality of local retail areas and the promotion and use of sustainable transport. This could have secondary positive effects for climate change mitigation from a greater level of self-containment and the lower emissions from reduced personal vehicle use.

9.31 Portsmouth's low-lying coastal location means that the city is susceptible to flood risk, not only from inundation but also surface water, rising ground water levels and possible wastewater infrastructure overflow during extreme weather events. With much of Portsmouth constrained by flood risk (notably large areas in the north, east, and south of Portsmouth), the spatial strategy includes allocations located within Flood Risk Zones 2 and 3, particularly within areas reliant on existing and future flood defences.

9.32 The flood risk associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to address this, is outlined below, recognising that policy has been informed by the Level 2 Strategic Flood Risk Assessment (SFRA):

- **Tipner West & Horsea Island East** and **Tipner East** are flat and low-lying and a significant part of Tipner West and Tipner East lie in Flood Zones 2 and 3. They were assessed as part of the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. These recommendations include a sequential approach to land use planning within the site, new flood defences, ground raising, secondary defences, and future-proofing. Tipner West & Horsea Island will deliver urgently required sea defences for the northern part of Portsea Island, whilst Tipner East will involve the installation of flood barriers prior to the commencement of development. Policies PLP3 (Tipner West & Horsea Island East) and PLP4 (Tipner East) outline that development proposals will be permitted provided that they integrate green and blue infrastructure into the masterplanning and design of the development and seek to mitigate the urban heat island effect and uncomfortable / unsafe wind conditions.
- **Lakeside North Harbour** is entirely within Flood Zone 1. However, it is estimated that in 100 years much of the site, which was built on reclaimed land, will be in Flood Zones 2 and 3. The site was assessed as part of the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that a site-specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting the Plan. This is in addition to the provision of Sustainable Drainage Systems (SuDS) to mitigate the risk of surface water flooding.

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- **Portsmouth City Centre** is entirely within Flood Zone 1 but in 100 years, the southwest extent is expected to be in Flood Zone 2.
- **Fratton Park & the Pompey Centre** is entirely within Flood Zone 1 and this is unlikely to change in 100 years. However, Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted if they provide SuDS to mitigate the risk of surface water flooding.
- **St James' & Landstone Campus** is entirely within Flood Zone 1. However, it is estimated that in 100 years the eastern extent of the site will be in Flood Zones 2 and 3. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that a site-specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan. This is in addition to the provision of SuDS to mitigate the risk of surface water flooding.
- **Horsea Island Open Space** is entirely within Flood Zone 1 and this is unlikely to change in 100 years.

9.33 With regards to the site allocations, **The News Centre, Port Solent,** and **Fraser Range** are within Flood Zones 2 and 3.

Commentary on city-wide policy provisions

- 9.34 Notably, plan development has been supported by the development of a Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2, which has sought to assist the Council in identifying appropriate avoidance and mitigation requirements for development within areas at risk of flooding and has fed into the policies being proposed.
- 9.35 With a focus on climate change adaptation, **Policy PLP36** (Coastal Zone) outlines that development proposals in the Coastal Zone will be permitted where they, amongst other considerations, are consistent with the Shoreline Management Plan and South Inshore and South Offshore Marine Plans.
- 9.36 **Policy PLP31** (Flooding) outlines criteria for development proposals that will need to be met to be permitted. This includes, but is not limited to, where they seek to reduce the impact and extent of all types of flooding; are accompanied by a site-specific Flood Risk Assessment; and the proposal meets the sequential and exception tests as set out in Government policy and guidance.
- 9.37 Adding on to the above, **Policy PLP32** (Sustainable Drainage Systems) supports the use of SuDS to manage surface water flood risk. Development proposals will be permitted where they ensure that surface run-off rates from the proposed development do not exceed the existing surface run-off rates (with a betterment preferred). Policy PLP32 also outlines that all applications should minimise the amount of hard landscaping and incorporate permeable surfaces and methods for rainwater harvesting to reduce surface water run-off.
- 9.38 With a focus on climate change mitigation, **Policy PLP2** (Climate Emergency) outlines that development proposals will be supported if they meet the criteria set out within the policy. This includes, but is not limited to, reducing greenhouse gas emissions and storing carbon; delivering a net zero energy standard in new buildings; and adapting and being resilient to the impacts of local climate change.

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- 9.39 **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) outlines that development proposals will be permitted where they are designed to reduce their impact on the environment during construction. This includes considering embodied emissions and the energy hierarchy. Importantly, the retention and retrofitting of existing buildings will be prioritised over demolition and replacement.
- 9.40 Finally, **Policy PLP34** (Renewable Energy) supports development proposals for wind turbines and solar photovoltaic arrays in appropriate locations provided they do not result in adverse impacts on living conditions. Development proposals for community renewable and low carbon energy generation developments will also be supported.

Cumulative effects

- 9.41 The Plan aligns with the wider flood risk and coastal management plans in place for the city and Solent region. The Plan seeks to work in tandem with the Shoreline Management Plan to ensure coastal defences will be resilient to long term coastal change and sea level rise. The Council will continue to work with the Environment Agency to achieve the best possible outcomes for new development and flood risk along the shoreline, including at Tipner.
- 9.42 Whilst increased pressures from further development in this coastal region have the potential to lead to cumulative adverse effects in relation to coastal change and sea level rises, the policy provisions which seek to deliver more sustainable development with increased flood and climate resilience are likely to ensure that significant cumulative effects are avoided.

Conclusions

- 9.43 The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, **minor negative effects** are concluded.

SA-5: Delivering high quality homes in Portsmouth

Commentary on the spatial strategy

- 9.44 The Plan sets a housing target of at least 13,603 net additional homes during the plan period (2020-2040) under **Policy PLP16** (Housing Target). This equates to a net annual provision of approximately 680 homes per year. Given the geographical constraints to development in Portsmouth, the Council are pursuing a supply-led strategy, accepting that housing needs as calculated by the NPPF standard methodology cannot be met with the land available for development in the City.
- 9.45 New homes will be delivered across five of the seven strategic sites allocated through the draft Plan, as follows:

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- **Tipner West & Horsea Island East** will deliver 814-1,250 new homes.
- **Tipner East** will deliver 1,056 new homes.
- **Portsmouth City Centre** will deliver 4,158 new homes.
- **Fratton Park & the Pompey Centre** will deliver 710 new homes.
- **St James' & Langstone Campus** will deliver 417 homes including elderly person and sheltered accommodation.

9.46 Five of the six site allocations will also deliver new homes, as follows:

- **Port Solent** will deliver 500 new homes.
- **St John's College** will deliver 212 new homes.
- **Fraser Range** will deliver 134 new homes.
- **The News Centre** will deliver 100 new homes.
- **Somers Orchard** will deliver 565 new homes.

9.47 Recognising the constraints to development in the city, the Council identify that housing needs will not be met within the City's administrative boundary. Partnership working, including as part of the Partnership for South Hampshire (PfSH), has sought to agree where the identified shortfall in housing supply could be delivered outside of the city's administrative boundary through the Duty to Cooperate. **Policy PLP16** outlines that 800 homes allocated in the Fareham Local Plan will contribute to Portsmouth's unmet need.

Commentary on city-wide policy provisions

9.48 Affordable homes are addressed through **Policy PLP17** (Affordable Homes), which outlines that development proposals where more than 10 residential dwellings will be provided (or where the site has an area of more than 0.5ha), will be permitted where they: a) provide 30% of residential dwellings as affordable homes; b) provide the tenure mix of affordable homes as 70% affordable rent and/ or social rent and 30% as another affordable route to home ownership (including shared ownership or discounted market sales housing); and c) are indistinguishable in design and appearance from the open market houses and integrated throughout the site.

9.49 Housing mix is addressed through **Policy PLP18** (Housing Mix), which states that development proposals for residential development, including as part of a mixed-used development, will be permitted where they provide a mix of dwelling sizes to meet projected future household needs for the City. Policy PLP18 outlines the housing mix in terms of size for both market homes and affordable homes (both owned and rented). It also highlights that all homes are to be built to accessible and adaptable standards, whilst at least 5% of all new market homes, and at least 10% of all affordable homes, are to be built as 'wheelchair accessible' dwellings (according to Building Regulations).

9.50 **Policy PLP19** (Housing for Specific Groups) outlines that development proposals will be supported for specialist housing where this is an identified need. This includes community-led development such as self-build or custom-build homes; specialist and supported housing; purpose-built student accommodation; Build to Rent homes; communal or co-living homes; and

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service personnel and service family accommodation. Policy PLP19 sets out specific requirements for self-build or custom-build homes, purpose-built student accommodation, Build to Rent homes, and communal or co-living homes.

- 9.51 **Policy PLP20** (Houses in Multiple Occupation) outlines that development proposals for new HMOs, and changes of use to existing HMOs, will only be permitted under specific circumstances, which are set out within the policy. Notably, a new HMO will only be permitted when less than 10% of residential properties within a 50-metre radius of the area surrounding the application property are in existing use as a HMO. This is to protect non-HMO residential properties and the amenity of nearby residents from the potential adverse impacts of HMOs.
- 9.52 **Policy PLP21** (Residential Density) states that residential development, including mixed-use schemes that have a residential element, should be high density (at least 120dph) in areas of high accessibility; medium density (at least 80dph) across the City's core residential areas; and lower density (at least 40dph) in the suburban edge. Meanwhile, **Policy PLP22** (Space Standards) is in place to ensure that development proposals meet the external and internal space needs of occupiers.
- 9.53 More broadly, **Policy PLP23** (Estate Renewal) supports development proposals within certain estates owned by the City Council, provided they meet the criteria set out within the policy. These estates are Paulsgrove, Portsea, Buckland, Landport, and Somertown and North Southsea. Development proposals for Gypsies, Travellers & Travelling Showpeople accommodation are addressed through **Policy PLP24** (Gypsies, Travellers & Travelling Showpeople).

Cumulative effects

- 9.54 The Local Plan states that the City's housing need cannot be met within the City's boundaries due to its constrained geography, which ultimately has a cumulative impact on the housing market in the wider area. As noted above, a contribution of 3,577 homes towards unmet housing need will be sought from neighbouring local authorities through the Duty to Cooperate. This is in addition to the 800 homes allocated to Portsmouth in the Fareham Local Plan, from 2023. This could add development pressures to communities outside of the Plan area, particularly in the development of greenfield land within the sub-region. However, it is recognised that the constraints to growth within the city itself have been highlighted through the joint PfSH work to date, and the local planning authorities across the partnership area are working together to plan for Portsmouth's unmet needs, including through continued exploration of Broad Areas of Search for Growth. The partnership working has the potential to support **significant cumulative positive effects** in the long-term, with strategic growth planned at the wider sub-regional scale. Furthermore, most of the sites identified to meet the housing target within the city are brownfield, which cumulatively will positively affect sustainable development of the city.

Conclusions

- 9.55 Overall, **significant positive effects** are concluded in relation to this objective, recognising that the Plan puts forward a viable housing strategy at this stage,

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though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for.

SA-6: Promoting healthy communities

Commentary on the spatial strategy

- 9.56 Portsmouth has more acute health inequalities and lower life expectancies than surrounding areas. There are also large inequalities between different parts of the city, for example males in areas of higher deprivation are dying 9.5 years earlier than those in the city's least deprived areas and there is a gap in life expectancy of 6.0 years for females. The Joint Strategic Needs Assessment (JSNA) and Public Health England Local Authority Profiles provide further snapshots of health and well-being in the city and have been used to identify priorities for health and well-being in the city which are reflected in the Portsmouth Health and Wellbeing Strategy 2018-2021.
- 9.57 The proposed spatial strategy focuses significant development at strategic development locations, many of which are located close to train stations and in areas of relatively good accessibility, particularly within the city centre. This will support objectives on healthy communities, encouraging sustainable transport use and short walking and cycling distances to key services and facilities, which will in turn encourage healthy lifestyles across communities. This is a key issue for the City Centre strategic site considering the AQMAs present.
- 9.58 The merits and constraints associated with the strategic sites allocated through the Local Plan, alongside how site-specific policy seeks to positively impact this objective and address constraints, are outlined below:
- **Tipner West & Horsea Island East** is located next to a large area of new open space to the north of the site on Horsea Island, which will be available for the new residents and visitors to enjoy (allocated under Policy PLP9). This will also benefit new residents at **Tipner East** if appropriate pedestrian and cycle access is delivered. There are plans for a new bridge linking not only the two halves of Tipner West & Horsea Island East, but the wider communities of Paulsgrove and Port Solent to the City Centre. The site will include meeting places for the principal use of the local community. Policy PLP3 (Tipner West & Horsea Island East) outlines that development proposals will be permitted provided that improved off-road pedestrian and cycle provision linking Port Solent and Tipner to the City Centre, nearby public open spaces, recreational facilities, and other local shops and services. This also applies for Tipner East under Policy PLP4.
 - **Portsmouth City Centre** will provide a new park at the City Centre North part of the site. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they protect and enhance existing open spaces. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that they integrate the following open spaces into new development to ensure public access is retained: The St James's Hospital Cricket Pitch, The Dog Park, land to the north west of the listed chapel and land to the east and west of Chapel Way.

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- **Fratton Park & the Pompey Centre** is located in walking distance to the services and facilities on offer in Fratton, including Fratton Railway Station. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that a network of interconnecting green and public access corridors throughout the site will be delivered to enhance the level of green infrastructure.
- **St James' & Langstone Campus** contains playing fields which are used by both the University and several local sports clubs. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted if they retain, where possible, playing pitches and fields and public access to them. Policy PLP8 also outlines that development proposals will be permitted provided that they integrate the following open spaces into new development to ensure public access is retained: The St James's Hospital Cricket Pitch, the Dog Park, land to the north-west of the listed Chapel and land to the east and west of Chapel Way.
- **Horsea Island Open Space** is allocated for strategic public open space. Policy PLP9 (Horsea Island Open Space) outlines that that development proposals will be permitted provided that the new open space provision considers the needs and safety of the intended users and the need to provide accessible multi-functional spaces.

9.59 With regards to the site allocations, **Port Solent** benefits from being located adjacent to strategic site Horsea Island Open Space. Meanwhile, **Somers Orchard** and **Former St John's College Southsea** are located in proximity to the city centre, in walking distance of services and facilities here.

Commentary on city-wide policy provisions

- 9.60 Policy **PLP35** (Air Quality and Pollution) states that planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers. In addition, major development proposals will be required to undertake an accompanying Health Impact Assessment, demonstrating how the planning application has been informed by the findings of the assessment in regard to air quality.
- 9.61 Policy **PLP45** (Open Space) supports development proposals where they seek to create, protect and/or enhance open space, and if practicable, improve accessibility to open space. Enhancements of existing open spaces should seek to maximise their quality, multifunctionality and accessibility. Development proposals that would result in the net loss of open space will only be allowed in special circumstances, which are set out within the policy. Development proposals for more than 50 new homes will be permitted where they provide an area of open space to the ratio of 1.65ha per 1,000 people.
- 9.62 In addition to the above, Local Green Spaces (LGSs) are designated and protected through **Policy PLP46** (Open Green Spaces).

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Cumulative effects

- 9.63 Cumulative effects are also anticipated in relation to improvements to accessibility, resulting from the in-combination effects of enhancements to public transport and cross-boundary walking and cycling networks.
- 9.64 The draft Plan seeks to protect and enhance the strategic network of biodiversity, open space, and green infrastructure, extending throughout the city and the wider region. The provision of natural and semi-natural green space through draft Plan proposals and projects (i.e., Green Corridors in Corsham, the Northern Road 'green corridor', green infrastructure provision at Pompey Centre, and regeneration in the city centre) will therefore deliver benefits at a sub-regional and local level, promoting access to greenspaces, and benefitting deprived communities.
- 9.65 Development proposed through the Plan could affect the implementation of Portsmouth's Local Air Quality Action Plan, AQMAs and the Clean Air Zone, as well as the potential for cumulative impacts. The Plan seeks to maximise opportunities to improve air quality and mitigate impacts through the delivery of strategic sites, supporting improved traffic and travel management, and infrastructure provision and enhancement.

Conclusions

- 9.66 On balance, it is appropriate to conclude that the draft Plan could lead to **significant long-term positive effects** in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.

SA-7: Conserving and enhancing the historic townscape

Commentary on the spatial strategy

- 9.67 The city's numerous heritage assets are valued for their architectural, aesthetic, historic, communal, and evidential contribution to the City. Notably, Portsmouth is one of the UK's principal naval dockyards and is of national and international significance. The historic buildings and townscape reflect the City's built heritage through the extensive network of military defences and in the barracks and other spaces / sites associated with the navy's long historic presence. Its heritage makes a vital contribution to its distinctiveness, sense of place and quality of life for its residents.
- 9.68 The heritage constraints associated with the strategic sites allocated through the Local Plan, alongside how site-specific policy seeks to positively impact this objective and address these constraints, are outlined below:
- **Tipner West & Horsea Island East** contains four grade II listed buildings, which form a rare and unusual group of historic early ordnance magazines. In addition, a scheduled monument 'Horsea Island D-Day Landing Craft Maintenance Site' immediately abuts the Horsea Island East site. Policy PLP3 (Tipner West & Horsea Island East) outlines that the listed buildings

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and scheduled monument must be retained, restored and re-used, the latter where this is desirable/ possible. Their fabric and setting must be conserved and should be enhanced. This will include the investigation, recording and safeguarding of known and potential finds of archaeological significance. Policy PLP3 also outlines that development proposals will be permitted provided that they allow views to and from Tipner West and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base.

- **Tipner East** does not contain any designated heritage assets; the nearest are the four grade II listed buildings within Tipner West & Horsea Island, approximately 220m northwest of the site on the other side of the M275 motorway.
- **Lakeside North Harbour** does not contain any designated heritage assets; the nearest is a grade II listed building approximately 80m east of the site. There is also a scheduled monument approximately 260m south of the site. The site is also in proximity to Old Wymering Conservation Area, which is located to the north of the site on the other side of the A27.
- **Portsmouth City Centre** contains 27 listed buildings, including three grade II* listed buildings. It also contains grade II listed park and garden 'Victoria Park' and overlaps with the Guildhall and Victoria Park and Mile End Conservation Areas. Policy PLP6 (Portsmouth City Centre) outlines that development within the Guildhall Cultural Regeneration Area should protect and enhance the setting of heritage assets and the Guildhall and Victoria Park Conservation Area.
- **Fratton Park & the Pompey Centre** does not contain any designated heritage assets; the nearest is a grade II listed building approximately 100m northeast of the site. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that the design, height and density of development integrates with and complements the existing context and character of the site.
- **St James' & Langstone Campus** contains two grade II listed buildings. It is also in proximity to Milton Locks Conservation Area to the southeast. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that they retain and conserve the significance and setting of these listed buildings and all other historic assets in the hospital grounds (St James). In addition, all proposed development must be accompanied by a heritage assessment (St James).
- **Horsea Island Open Space** does not contain any designated heritage assets; the nearest is a scheduled monument approximately 130m south of the site. Policy PLP9 (Horsea Island Open Space) outlines that development proposals will be permitted provided that they allow views to and from the open space and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base.

9.69 In terms of allocation sites, whilst site-specific policies play a role, it is considered that the city-wide draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically

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linked to ensuring that these sites avoid, and where necessary, mitigate and manage the potential negative effects that may arise.

Commentary on city-wide policy provisions

- 9.70 The draft Plan proposes a number of policies that support and guide development to minimise the impact of the spatial strategy on the historic environment, and maximise opportunities for enhancements, particularly in terms of accessibility.
- 9.71 **Policy PLP53** (Historic Environment) outlines that development proposals will only be permitted where they conserve or enhance the City's heritage assets in a manner appropriate to their significance. Development proposals which affect heritage assets, or their setting, will be determined with regard to the significance of the asset. Where a development proposal would impact on the fabric or setting of a designated or non-designated heritage asset, the applicant will be required to provide a supporting Heritage Statement. Development proposals that would improve the condition of heritage assets that are considered to be 'at risk' through neglect, decay or other threats will be encouraged and supported.
- 9.72 **Policy PLP54** (Listed Buildings) states that development proposals which affect a listed building or its setting will only be permitted where: a) they preserve or enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance is avoided; and b) harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Council. Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.
- 9.73 **Policy PLP55** (Conservation Areas) only permits development proposals within a conservation area, or within its setting, where they preserve or enhance the character or appearance of the conservation area.
- 9.74 **Policy PLP56** (Archaeology) seeks to protect archaeological assets and their setting from harm as a result of development. Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance. There will be a presumption in favour of preservation in-situ for scheduled monuments and other archaeological heritage assets of equivalent significance.

Cumulative effects

- 9.75 The city's economy is boosted by its tourism and cultural offer, stemming largely from its Naval Heritage and coastal environment. The city attracts visitors from around the world, and therefore regeneration proposed through the spatial strategy is likely to support the sub-regional marine and maritime sector. **Minor positive cumulative effects** are considered likely in this respect.
- 9.76 Additional homes may also need to be sought beyond the constrained city boundaries (through the 'Duty to Cooperate') within neighbouring authority areas, adding development pressures to land within the sub-region, which may cumulatively affect the wider historic environment setting.

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Conclusions

- 9.77 Overall, the draft Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to **minor positive effects**, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.
- 9.78 Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains **uncertain** at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout and integration.

SA-8: Requiring good urban design in Portsmouth

Commentary on the spatial strategy

- 9.79 The spatial strategy provides direct links to elements of good design, including by focussing significant new growth requirements in key locations that are, or can be made sustainable, with high levels of accessibility which in turn will limit the need to travel. Sites within the City Centre and Fratton offer a choice of transport modes, with good bus and rail links, and are therefore considered overall as highly accessible locations, with strategic growth likely to encourage walking and cycling and a modal shift.
- 9.80 Furthermore, delivering growth at scale through strategic sites is considered likely to unlock higher and bespoke standards of design that provide high quality place making. The spatial strategy seeks to deliver strategic development / regeneration throughout the city that reflects and enhances each area's defining characteristics, while also achieving high design quality and shaping the future of the city.
- 9.81 The strategic sites allocated through the draft Plan address good urban design through their site-specific policies, as outlined below:
- Policies PLP3 (**Tipner West & Horsea Island East**) and PLP4 (**Tipner East**) for the separate sites outline that development proposals will be permitted provided that they create a new landmark gateway to the City of Portsmouth to be demonstrated through a conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code.
 - Policy PLP5 (**Lakeside North Harbour**) outlines that development proposals will be permitted provided that:
 - A masterplan and design code for the whole site is prepared, submitted and approved as part of a site-wide planning application, to ensure that all future development at Lakeside is brought forward in a holistic manner; and

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- A high standard and quality of design is achieved which is sympathetic to the existing high quality, campus-style setting of the business park and the areas and networks of recognised ecological value.
- Policy PLP6 (**Portsmouth City Centre**) outlines that development proposals will be permitted provided that they demonstrate how its design enhances the City Centre's appearance and considers the needs of its users through the provision of a design code.
- Policy PLP7 (**Fratton Park & the Pompey Centre**) outlines that development proposals will be permitted provided that the design, height and density of development should integrate with and complement the existing context and character of the site and be developed in accordance with other policies within the draft Plan.
- Policy PLP8 (**St James' & Langstone Campus**) outlines that development proposals will be permitted provided that the design and layout conserves or enhances and appropriately integrates into the locally distinct parkland landscape setting and open character of the site.
- Policy PLP9 (**Horsea Island Open Space**) outlines that development proposals will be permitted provided that they take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern portion of the site.

9.82 In terms of non-strategic sites, it is considered that the wider draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

9.83 Design is considered through the Plan, playing a key role in the delivery of policies across all ten objectives.

9.84 The focus of design is **Policy PLP1** (Design), which is in place to ensure that a high standard and quality of design and place-making that support beauty is achieved in the city. It sets out criteria which development proposals will be assessed against. This includes, but is not limited to, understanding and relating positively to local context, character and identify, and creating appropriate forms and types of development.

9.85 **Policy PLP49** (Public Realm) outlines that development proposals will be permitted where opportunities to enhance the public realm have been designed into the application. This is to ensure, amongst other things, that aspects of the public realm incorporate design of the highest quality, including landscaping, green and blue infrastructure, lighting, acoustics, street furniture, and surfaces.

9.86 With a focus on housing, **Policy PLP19** (Housing for Specific Groups) outlines that development proposals involving more than one self-build or custom-build on a site must be supported by a design framework that is submitted as part of the planning application. In addition, **Policy PLP23** (Estate Renewal) supports development proposals within the Council's estates provided that they deliver high quality design and sustainability, considering any relevant design guidelines or codes. Finally, **Policy PLP24** (Gypsies, Travellers & Travelling

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Showpeople) states that good design and landscaping should ensure that sites have adequate residential amenity and privacy for intended occupiers.

- 9.87 Regarding the historic environment, **Policy PLP55** (Conservation Areas) states that development in a conservation area will be permitted where a consistently high standard of design has been applied and good quality materials, especially those that are locally sourced and/or distinctive are proposed to be used.
- 9.88 **Policy PLP35** (Air Quality and Pollution) outlines that planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers.
- 9.89 **Policy PLP47** (Movement and Transport) states that the design and site layout of new development must protect the safety and amenity of all and give priority to the needs of pedestrians, cyclists, users of mobility aids and other non-motorised forms of transport. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it. Design is also considered through **Policy PLP48** (Access and Parking).
- 9.90 **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) states that proposals will need to demonstrate consideration of all aspects of sustainable design and construction for the lifecycle of the development. Planning permission will be granted where proposals have certified against an independent assessment framework (or equivalent replacement scheme), or an alternative scheme.
- 9.91 More broadly, **Policy PLP2** (Climate Emergency) states that development proposals will be supported provide that they are designed to adapt and be resilient to the impacts of local climate change. In addition, **Policy PLP32** (Sustainable Drainage Systems) only permits development proposals where SuDS are sensitively located and designed to promote an enhanced landscape / townscape and good quality spaces that improve public amenity.
- 9.92 Also of relevance to this objective, **Policy PLP30** (Cultural and Visitor Economy) states that proposed development must be of an appropriate type, scale and design to complement and support the role of the existing centre or area and enhance its character.

Cumulative effects

- 9.93 The draft Plan recognises that high-quality design and masterplanning can support local, regional, and national climate change objectives. Good urban design can improve the sustainability performance of development (i.e. in terms of energy efficiency) while also improving accessibility to reduce the need to travel. On this basis, **minor positive cumulative effects** are considered likely.

Conclusions

- 9.94 The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and

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provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines **minor long-term positive effects** are considered likely overall.

SA-9: Conserving and enhancing the natural environment in Portsmouth

Commentary on the spatial strategy

9.95 Portsmouth, despite its dense urban environment, benefits from a rich diversity of flora and fauna in its coastal, harbour and chalk grassland environments. It is the UK's only 'island city' and some 30% is covered by statutory nature conservation designations in recognition of its value to international, national and local biodiversity. The intertidal areas around Portsmouth, particularly the mudflats, shingle and saltmarsh provide ideal feeding and roosting grounds for overwintering bird species that are especially adapted to feeding in such habitats. The impacts of new development and construction can cumulatively disturb and pollute these environments, potentially affecting the health and key species and the quality of the water environment in the Solent.

9.96 The wider Solent area is generally regarded as a region of significant ecological value and sensitivity. Given the urban nature of southern Hampshire, an extensive evidence base relating to potential impact pathways has been developed. Furthermore, there are well-established issues (e.g. recreational disturbance and functionally linked habitat loss) for which strategic mitigation measures have already been developed.

9.97 The constraints associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to positively impact the natural environment and address constraints, are outlined below:

- **Tipner West & Horsea Island East** partially overlaps Portsmouth Harbour SPA, Ramsar site and SSSI. It also contains BAP priority habitats deciduous woodland, lowland calcareous grassland, coastal and floodplain grazing marsh, and mudflats. Regarding the National Habitat Network, the site contains lowland calcareous grassland and almost entirely overlaps Network Enhancement Zone 2. Regarding priority species for Countryside Stewardship (CS) targeting, the site overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. The former firing range on the site is recognised as a primary support area (P60) for Brent geese. The delivery of sea defences together with site decontamination works at the site will protect the integrity of the nearby nature conservation sites and associated habitats from harmful leachate contamination and inundation from flooding. Policy PLP3 (Tipner West & Horsea Island East) outlines that development proposals will be permitted provided that they:
 - Identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks.
 - Avoid the loss of SPA/ Ramsar habitats including by way of land reclamation. If that is not viable or feasible, minimise such loss to that required to enable the viable and feasible development of the site in

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- line with the City Deal whilst protecting the integrity of the international, national and local nature designations.
- Mitigate likely significant effects from recreational disturbance to protected bird populations through a bespoke developer-provided package of measures for the lifetime of the development as advised by Natural England; and
 - Provide for public access along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations.
- **Tipner East** is adjacent to Portsmouth Harbour SPA, Ramsar site and SSSI. It also contains BAP priority habitat mudflats and almost entirely overlaps Network Enhancement Zone 2 of the National Habitat Network. Regarding priority species for Countryside Stewardship targeting, the site overlaps priority areas for Countryside Stewardship measures addressing Lapwing and Redshank habitat issues. Part of the site is identified as a secondary support area (P139) for Brent geese. Policy PLP4 (Tipner East) outlines that development proposals will be permitted provided that they:
 - Provide for public access along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations; and
 - Provide appropriate compensation and mitigation measures to the satisfaction of the local planning authority and Natural England in regard to the Secondary Support Sites P136 and P139 of the Solent Waders and Brent Goose Strategy.
 - **Lakeside North Harbour** is approximately 130m north of Portsmouth Harbour SPA, Ramsar site and SSSI, located on the other side of the M27. It also contains BAP priority habitat deciduous woodland and partially overlaps Network Enhancement Zone 2 and Network Expansion Zone of the National Habitat Network. Regarding priority species for CS targeting, the site overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Part of the site is designated as a SINC and is partially within Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Over 200 of the trees within the site are covered by individual Tree Preservation Orders (TPOs). Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that:
 - Surveys are carried out to determine the classification of Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England.
 - BNG of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) on site.
 - An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site.
 - **Portsmouth City Centre** is approximately 1.1km south of Portsmouth Harbour SPA, Ramsar site and SSSI. It contains BAP priority habitat deciduous woodland (Victoria Park). Regarding priority species for CS

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targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they:

- Protect trees within the City Centre and take opportunities to plant more and provide enhanced greening.
 - BNG of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) at City Centre North.
- **Fratton Park & the Pompey Centre** is approximately 1.5km west of Solent Maritime SAC, Chichester and Langstone Harbours SPA and Ramsar site, and Langstone Harbour SSSI. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that a network of interconnecting green and public access corridors throughout the site will be delivered to enhance the level of green infrastructure and encourage net gains in biodiversity.
 - **St James' & Langstone Campus** is adjacent to Chichester and Langstone Harbours SPA and Ramsar site, Solent Maritime SAC, and Langstone Harbour SSSI. It contains BAP priority habitat deciduous woodland and partially overlaps Network Enhancement Zones 1 and 2 and Restorable Habitat. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. The hospital grounds (St James) contain a large number of mature trees, including TPOs. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that an Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site (St James). In addition, Policy PLP8 outlines that development proposals must provide appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA, Solent Maritime SAC and any other nationally or locally designated habitat sites including supporting habitats.
 - **Horsea Island Open Space** is adjacent to Portsmouth Harbour SPA, Ramsar site and SSSI. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP9 (Horsea Island Open Space) outlines that that development proposals will be permitted provided that the open space provides for a mosaic of habitat that links to and supports the habitat of the neighbouring Portsmouth Harbour SPA and recognises the role of the site as core and primary supporting habitat for waders and Brent Geese. It contains BAP priority habitats deciduous woodland and lowland calcareous grassland and partially overlaps Network Enhancement Zone 2.

9.98 The Local Plan is supported by a Habitats Regulations Assessment (HRA). This concludes that no elements of the Portsmouth Local Plan will have an adverse effect on the integrity of any Habitats sites, either alone or in

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combination with other plans or projects, except for the redevelopment of Tipner peninsula as set out in **Policy PLP3: Tipner West & Horsea Island East**. Accordingly, that policy can only be adopted lawfully if it meets the statutory derogations tests. The HRA therefore examines whether alternative solutions exist, including alternative solutions to the flood prevention and sea defence elements of the allocation, alternative solutions to the site decontamination elements of the allocation, alternative solutions to the marine employment hub element of the allocation, alternative solutions to the bridge element of the allocation, and alternative solutions to the housing element of the allocation. The HRA also considers whether there are IROPI and whether there is sufficient suitable land available to provide compensatory measures for the direct loss of habitat predicted. The overall conclusion is that the derogations tests are met and that *“sufficient information exists at the Local Plan level to be able to conclude that the Tipner West and Horsea Island East (Policy PLP3) that a) there are no feasible alternatives to this allocation while still meeting the objectives of the Local Plan and Portsmouth City Deal, b) that there are IROPI as to why the Local Plan should be adopted with Policy PLP3 intact despite the harm caused to Portsmouth Harbour SPA/ Ramsar site, and c) there is sufficient land identified for delivery of compensatory measures that there is a high likelihood sufficient compensatory provision could be secured at the planning application level.”*

- 9.99 In terms of non-strategic sites, whilst the site-specific policies play a role, it is considered that the wider draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

- 9.100 **Policy PLP36** (Coastal Zone) outlines that development proposals in the Coastal Zone will be permitted where they, amongst other considerations, seek opportunities to maintain and enhance access to the coast whilst minimising recreational disturbance to bird populations.
- 9.101 **Policy PLP38** (Green Infrastructure) outlines that major development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework. The policy identifies a Green Grid and Green Corridors, which development should seek to conserve and enhance.
- 9.102 **Policy PLP39** (Biodiversity) outlines that development proposals will be permitted where they conserve and enhance biodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Up-to-date ecological information should be submitted which demonstrates that development proposals, amongst other considerations, retain, protect and enhance features of biodiversity interest and protect and support recovery of rare, notable and priority species. Policy PLP39 sets out a hierarchy of site designation, which will apply in the consideration of development proposals. Internationally protected SPAs, SACs and Ramsar sites are at the top of this hierarchy, followed by nationally protected SSSIs and NNRs; irreplaceable habitats (veteran and ancient trees); and finally locally protected LWSs, SINC, SNCIs and LNRs.

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- 9.103 Under **Policy PLP40** (Biodiversity Net Gain), development proposals will be permitted where they demonstrate at least a 10% net gain in biodiversity, accounted for in a biodiversity net gain plan. The policy highlights that development proposals should prioritise on-site BNG. In addition, development proposals within the strategic sites of Portsmouth City Centre and Lakeside, and the allocation site of Somers Orchard, which are all owned by the City Council, will need to demonstrate a 20% net gain in biodiversity accounted for in a biodiversity net gain plan.
- 9.104 **Policy PLP41** (Trees & Hedgerows) seeks to protect trees and hedgerows by ensuring that development proposals seek to retain on-site trees and hedgerows where possible, particularly those with TPOs. It also supports an increase in tree canopy cover in line with the Natural England Green Infrastructure Urban Tree Canopy Cover Standard. Specifically, tree canopy cover of at least 15% will need to be provided on new major development and lost trees should be replaced at a ratio of 1:1. Development proposals that would result in the loss or deterioration of ancient or veteran trees will only be allowed in exceptional circumstances.
- 9.105 **Policy PLP42** (Solent Waders and Brent Geese Sites) seeks to protect functionally linked sites, which are used by Solent Waders and/or Brent Geese, from adverse impacts commensurate to their status in the hierarchy of the Solent Wader and Brent Geese Network as outlined in the Solent Waders and Brent Goose Strategy. Proposals that impact these sites will need to provide mitigation as set out within the Solent Waders and Brent Goose Strategy.
- 9.106 **Policy PLP43** (Recreational Disturbance on International Nature Designations) states that planning permission for proposals resulting in a net increase in residential units will be permitted where a financial contribution is made towards the Solent Recreation Mitigation Strategy. In the absence of this, proposals will need to avoid or mitigate any in combination negative effects from recreation through a developer-provided package of measures for the lifetime of the development. Policy PLP43 also outlines that development should avoid noise disturbance impacts on birds at the SPA sites and/or at identified terrestrial SPA supporting habitat sites though the overwintering period.
- 9.107 Nutrient neutrality is addressed through **Policy PLP44** (Nutrient Neutrality in International Nature Designations). This policy permits development proposals where they demonstrate, through a nutrient budget, that they secure nutrient neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits, or a mixture of these.
- 9.108 More broadly, **Policy PLP51** (Electronic Communications and/or Utilities Infrastructure) seeks to ensure that development proposals for new electronic communications and/or utilities infrastructure minimises environmental impacts.

Cumulative effects

- 9.109 The HRA cannot exclude adverse effects on internationally and nationally protected habitats whilst the plan includes Policy PLP3 for the allocation site Tipner West and Horsea Island East. This will have cumulative effects for designated sites subject to wider growth pressures across the Solent and effects are likely to be both positive and negative. If the allocation is developed

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as proposed, benefits are likely to emerge in relation to water quality and meeting WFD targets, as well as indirectly through increased resilience to climate change and flood risk across the sub-region in combination with other plans.

Conclusions

9.110 In line with the findings of the HRA, at this stage the potential for **significant negative effects** in relation to this SA objective are identified, and it will be down to sufficient delivery of compensatory measures to reduce the extent of these effects. The benefits of the allocation and IROPI will ultimately be weighed by plan-makers against these likely impacts.

SA-10: Facilitating the sustainable use of natural resources in Portsmouth

Commentary on the spatial strategy

9.111 In terms of land resources, the Plan recognises the role of the Hampshire Minerals and Waste Plan in enabling the delivery of sustainable minerals and waste development. Whilst the city contains safeguarded reserves of Brick Clay, Superficial Sand and Gravel and Soft Sand, these are largely limited to important reserves beneath areas of open space. The open space network is largely protected through the proposed spatial strategy and wider policies as discussed under the next heading.

9.112 The constraints associated with five of the seven strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to address constraints, are outlined below:

- **Tipner West & Horsea Island East** is currently partly derelict and contains a number of unrelated land uses including a former Ministry of Defence firing range, boatyards, recycling, storage, and a special educational needs school. The site needs significant remediation to address historic polluting uses. Its redevelopment, as recognised in the City Deal, presents an opportunity to vastly improve the quality of the environment in this part of the city.
- **Tipner East** has a long history of polluting land uses dating back to the 1860s. At the time of writing (2024) the remediation works were underway in line with the Construction Environmental Management Plan approved for planning application (10/00849/OUT).
- Policies PLP3 (Tipner West & Horsea Island East) and PLP4 (Tipner East) outline that development proposals for the separate sites will be permitted provided that they:
 - Deliver appropriate surface water and foul drainage infrastructure together with required nutrient neutrality and water usage mitigation measures to support the Environment Agency in achieving and/or maintaining at least 'good' water quality status and to protect designated habitats within the Portsmouth Harbour Waterbody; and
 - Mitigate and remediate contamination from current and historic uses.

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- **Lakeside North Harbour** was built on reclaimed land from the northern section of Portsmouth Harbour. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority.
- Policy PLP6 (**Portsmouth City Centre**) outlines that development proposals will be permitted provided that evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority.
- **Horsea Island Open Space** is allocated for strategic public open space. Policy PLP9 (Horsea Island Open Space) outlines that that development proposals will be permitted provided that they take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern part of the site.

9.113 In terms of non-strategic sites, whilst the site-specific policies play a role, it is considered that the city-wide draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

9.114 **Policy PLP1** (Design) requires that large-scale major developments should be supported by detailed masterplans or development frameworks and, where appropriate, design codes. Design considerations include the use of materials and their quality, sustainability, and durability, as well as materials in hard and soft landscaping and high-quality public and private spaces. Supported by **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) which requires that relevant proposals must demonstrate using a Sustainability Statement that all resources are used efficiently, as part of the construction and operation of a building, including consideration of embodied emissions.

9.115 **Policy PLP45** (Open Space) seeks to protect and enhance the open space network as well as accessibility to open space. The policy restricts the loss of existing space, whilst requiring new open space in significant development proposals. Development will be expected to create net gains in biodiversity through the requirements of **Policy PLP40** (Biodiversity Net Gain), and **Policy PLP38** (Green Infrastructure) outlines that major development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework. Not only do the policies seek to retain and enhance the existing green infrastructure network, but in doing so also provide indirect support for the retention of the city's mineral resources.

9.116 The extension of appropriately located high-density areas (**Policy PLP21** (Residential Density)) will make more efficient and effective use of land, increasing accessibility in the urban centres. What is 'appropriate' will be determined in part by urban design principles that combine layout, form and scale in a way that responds positively to its context.

9.117 **Policy PLP37** (Contaminated Land) outlines that planning permission will only be granted for development on or near contaminated land, or where the

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presence of contamination is reasonably suspected, where appropriate and sufficient measures can be taken to remediate and/or satisfactorily mitigate the risk of contamination. Such measures must address the long-term safety of the proposed development, the end users of that development, and the natural environment and include the future management of the site.

Cumulative effects

9.118 Development within the city has the potential to cumulatively impact upon the wider water resource management zone, though joint working with Portsmouth Water and Southern Water is likely to ensure that water resource needs can be met throughout the plan period in line with the objectives and actions outlined through the Water Resource Management Plans.

9.119 With a focus on regeneration opportunities, and the premise for biodiversity net gain enhancing a strategic green infrastructure network that extends the city, **minor positive cumulative effects** are anticipated overall.

Conclusions

9.120 The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural resources that support the ecosystems and green infrastructure network of the city. The spatial strategy and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, **minor long-term positive effects** are concluded as likely.

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10. Conclusions and recommendations

10.1 Overall, the following conclusions are reached for each of the SA objectives:

| SA objective | Plan appraisal conclusion |
|---|--|
| SA-1: Building a strong, competitive economy in Portsmouth | The spatial strategy and policy provisions of the draft Plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall significant positive effects are considered likely as a result. |
| SA-2: Ensuring the vitality of the City Centre and other town centres in Portsmouth | The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, significant positive effects are anticipated overall. |
| SA-3: Promoting sustainable transport in Portsmouth | Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, long-term minor positive effects are considered likely overall. |
| SA-4: To tackle climate change, flooding, and coastal change in Portsmouth | The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, minor negative effects are concluded. |
| SA-5: Delivering high-quality homes in Portsmouth | Overall, significant positive effects are concluded in relation to this objective, recognising that the Plan has put forward a viable housing strategy at this stage, though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for. |

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SA objective**Plan appraisal conclusion**

SA-6: Promoting healthy communities

On balance, it is appropriate to conclude that the draft Plan could lead to **significant long-term positive effects** in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.

SA-7: Conserving and enhancing the historic townscape

Overall, the draft Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to **minor positive effects**, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.

Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains **uncertain** at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout, and integration.

SA-8: Requiring good urban design in Portsmouth

The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility, and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines **minor long-term positive effects** are considered likely overall.

SA-9: Conserving and enhancing the natural environment in Portsmouth

In line with the findings of the HRA, at this stage the potential for **significant negative effects** in relation to this SA objective are identified, and it will be down to sufficient delivery of compensatory measures to reduce the extent of these effects. The benefits of the allocation and IROPI will ultimately be weighted by plan-makers against these likely impacts.

SA-10: Facilitating the sustainable use of

The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural

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SA objective**Plan appraisal conclusion**

natural resources in
Portsmouth

resources that support the ecosystems and green infrastructure network of the city. The spatial strategy and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, **minor long-term positive effects** are concluded as likely.

10.2 A range of potential effects are identified overall and whilst potential significant effects are predominantly positive in nature, it is recognised that (in line with the findings of the HRA) significant negative effects are also considered likely in relation to the loss of functional habitat at internationally and nationally designated biodiversity sites. This will require compensatory measures and continued monitoring.

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Part 3: What happens next?

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11. Next steps

11.1 The aim of Part 3 is to explain the next steps in the plan-making/ SA process and identify potential monitoring measures.

Next steps

11.2 This SA Report will accompany the Local Plan for pre-submission (Regulation 19) public consultation. Any comments received will be reviewed and considered. The representations received along with any further evidence base work, including further SA work, will inform the submission version of the Local Plan, which the Council currently aims to submit for Independent Examination in 2024.

Monitoring

11.3 It is anticipated that monitoring will be undertaken as part of the Council's annual monitoring process, as reported through yearly Authority Monitoring Reports. Any additional monitoring requirements, if deemed necessary through the final plan-making stages, will be identified in the SA Adoption Statement (produced at the time of adoption of the plan).

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Appendices

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Appendix A – Regulatory requirements

As discussed in Chapter 1 of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Tables A, B & C** link the structure of this report to an interpretation of Schedule 2 requirements, and explains this interpretation.

Table A: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

| Report section | Questions answered | Regulatory requirement met |
|---------------------|---|--|
| Introduction | What is the plan seeking to achieve? | <ul style="list-style-type: none"> An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes. |
| | What is the scope of the SA? | <ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment. |
| Part 1 | What has plan-making/ SA involved up to this point? | <ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan. |
| Part 2 | What are the SA findings at this current stage? | <ul style="list-style-type: none"> The likely significant effects associated with the Plan. The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan. |
| Part 3 | What happens next? | <ul style="list-style-type: none"> A description of the monitoring measures envisaged. |

- Official -

Table B: Questions answered by the SA Report, in accordance with regulatory requirements

| <u>Schedule 2</u> | <u>Interpretation of Schedule 2</u> | |
|---|---|--|
| <i>The report must include...</i> | <i>The report must include...</i> | |
| 1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes; | An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes | i.e. answer - <i>What's the plan seeking to achieve?</i> |
| 2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan | Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level | i.e. answer - <i>What's the 'context'?</i> |
| 3. the environmental characteristics of areas likely to be significantly affected; | | |
| 4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC; | The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected | i.e. answer - <i>What's the 'baseline'?</i> |
| 5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation; | | |
| 6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors; | Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance | i.e. answer - <i>What are the key issues & objectives?</i> |
| 7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan; | Key environmental problems / issues and objectives that should be a focus of appraisal | |
| 8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information | An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach') | i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report] |
| 9. a description of the measures envisaged concerning monitoring. | The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan. | |
| | The likely significant effects associated with the draft plan | i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report] |
| | The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan | |
| | A description of the measures envisaged concerning monitoring | i.e. answer - <i>What happens next?</i> [Part 3 of the Report] |

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Table C: 'Checklist' of how (throughout the SA process) and where regulatory requirements are or will be met.

| Regulatory requirement | Discussion of how the requirement is met |
|---|--|
| Schedule 2 requirements: | |
| 1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes. | Chapter 2 ('What's the plan seeking to achieve') presents this information. The relationship with other plans and programmes is also set out in Appendix B (Scoping Information). |
| 2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. | These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2017. The outcome of scoping was an 'SA Framework', and this is presented within Chapter 3 ('What's the scope of the SA'). More detailed messages from the Scoping Report - i.e., messages established through context and baseline review - are presented within Appendix B. This also includes updates to scoping since the publication of the Scoping Report. |
| 3. The environmental characteristics of areas likely to be significantly affected. | |
| 4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC. | |
| 5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation. | The Scoping Report (2017) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an 'SA framework'. The scoping information is presented in Appendix B and includes any relevant updates. The context review informed the development of the SA framework and topics, presented in Chapter 3, which provide a methodological 'framework' for appraisal. With regards to explaining "how... considerations have been taken into account" - <ul style="list-style-type: none"> • Chapter 5 explains how reasonable alternatives were established in-light of available evidence. • Chapter 6 sets out the summary findings of the appraisal of policy options. • Chapter 6 sets out the detailed appraisal of city-wide spatial options for housing and employment growth. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations. |
| 6. The likely significant effects on the environment, including on issues such as biodiversity, population, human | <ul style="list-style-type: none"> • Chapter 5 explains how reasonable alternatives were established in-light of available evidence. |

- Official -

Regulatory requirement**Discussion of how the requirement is met**

health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).

- Chapter 6 sets out the summary findings of the appraisal of policy options.
- Chapter 6 sets out the detailed appraisal of city-wide spatial options for housing and employment growth.
- Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.

As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/ dimensions.

7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6) and appraisal of the Draft Local Plan (Chapters 9 and 10).

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options.

Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal).

Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.

9. A description of the measures envisaged concerning monitoring in accordance with Article 10.

It is anticipated that monitoring measures will be detailed in the SA Adoption Statement.

10. A Non-Technical Summary of the information provided under the above headings.

A Non-Technical Summary (NTS) is provided separately.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).

At the current time, this SA Report is being published alongside the Regulation 19 Local Plan for public consultation.

The SA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Council will take into account this SA Report and consultation responses when preparing the Local Plan for submission.

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Appendix B – Scoping information

Scoping was undertaken in 2017, and a full baseline summary for each of the identified SA objectives is provided in the [Portsmouth City Council Sustainability Appraisal Scoping Report](#).

Since this Scoping Report was published, further updates have been provided in the [Portsmouth City Council Interim Sustainability Report](#), published in 2021. This report contained updates to national policy from 2017 to 2021, including those to the National Planning Policy Framework (NPPF) and the National Design Guide and National Model Design Code. It also includes a number of environmental policy updates, including the Environment Bill, the 25-Year Environment Plan, the UK (second) National Adaptation Programme, 'Build Back Better', the Clean Growth Strategy, updated transport strategies, and the Clean Air Strategy. Further, the release of the 'Build Back Fairer' The Covid-19 Marmot Review, Portsmouth Water's Final Water Resources Management Plan (WRMP) and Drought Plan 2019, and various updated evidence provided by Portsmouth City Council.

It is recognised that a number of **national policy changes and evidence updates** have been made since 2021, those of significance are reported below.

- [National Planning Policy Framework \(NPPF\)](#)
- The NPPF sets out the government's planning policies for England and how these are expected to be applied. There have been two updates recently to the NPPF, once in September, 2023 in which very little had changed from the previous update, with the main amendments to the policy coming under 'Meeting the challenge of climate change, flooding and coastal change'. This update to the NPPF assisted decision makers dealing with proposals to use and improve existing renewable energy sites giving weight to the advantages of doing so. It was then updated for a second time in December of 2023. The key changes introduced by the government through the updated Framework are:
 - Facilitating flexibility for local authorities in relation to local housing need.
 - Clarifying a local lock on any changes to Green Belt boundaries.
 - Safeguarding local plans from densities that would be wholly out of character.
 - Freeing local authorities with up-to-date local plans from annual updates to their five-year housing land supply.
 - Limiting the practice of housing need being exported to neighboring authorities without mutual agreement.
 - Bolstering protections from speculative development for neighborhoods that develop their own plans.
 - Supporting self-build, custom-build, and community-led housing.
 - Cementing the role of beauty and placemaking in the planning system.

The revisions confirm that strategic policies should optimize site densities and prioritize brownfield and other under-utilized urban sites. Annex 1 provides guidance on implementation stating that where emerging local plans reach pre-submission consultation after 19th March 2024, the policies in the current NPPF

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will apply, with all other plans continuing to be examined in the context of previous iterations of the Framework.

- [The UK Climate Change Risk Assessment 2022](#)

The UK Climate Change Risk Assessment 2022, published in January of 2022, is the third five-year assessment of the risks climate change poses to the UK, as required by the Climate Change Act (2008). It identifies 61 climate risks that will impact upon multiple areas of society, and identifies eight priority risk areas for action. These include (but are not limited to) risks to soil health, risks to human health, wellbeing and productivity, and risks to the viability and diversity of habitats and species.

- [The Net Zero Strategy: Build Back Greener](#)

Published in October 2021, sets out policies and proposals for decarbonizing all sectors of the UK economy in order to meet the Net Zero by 2050 target. It outlines four key principles that will contribute to this target: working with the grain of consumer choice, ensuring the biggest polluters pay the most, protecting the most vulnerable, and deliver deep cost reductions in low carbon technology.

- [Decarbonising Transport: A Better, Greener Britain](#)

This sets out the government's commitments to decarbonise the entire transport system in the UK, and actions needed to achieve this. This includes an outline of the pathway to net zero transport in the UK, the wider benefits net zero transport can deliver, and the principles that underpin the approach to delivering net zero transport. The [Decarbonising Transport: One Year On](#) (published July 2022) summarises what has been achieved to reduce emissions from transport, and the next steps the government will take to support further decarbonisation of the sector.

- [The Waste Management Plan for England](#)

Published in January 2021, is an analysis of the current waste management situation in the country, with the aim of bringing current waste management policies together under one national plan.

- [The Environment Act 2021](#)

This act seeks to halt the decline of species by 2030, clean up the air and protect the health of rivers in the UK, as well as reform the way in which waste is dealt with and resources are used. It also seeks to tackle deforestation overseas, and will require new development to improve or create habitats as part of the design.

- [The National Infrastructure Strategy](#)

Published in November 2020, sets out the government's plans to deliver an improvement to the UK's infrastructure to help level up the country and support the journey to net zero emissions by 2050.

- [Health Equity in England: The Marmot Review 10 Years On](#)

Published in February 2020. The report highlights that people can expect to spend more of their lives in poor health, that improvements to life expectancy have stalled (and declined for women in the 10% most deprived areas), the health gap between healthy and deprived areas has grown, and that place does have an impact on health.

- [Portsmouth Water's Draft Water Resource Management Plan \(WRMP\) 2024](#)

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Portsmouth's Draft WRMP 2024 highlight the acute stresses that the area will face in over the next 50 years and the challenges in terms of securing water resources into the future, due to population growth and climate change. The Plan outlines how Portsmouth Water aim to confront and manage these issues to ensure secure reliable, healthy drinking water supplies and the timely provision of clean water to all residents.

- Updated evidence provided by Portsmouth City Council:
 - [Portsmouth City Council's Housing and Economic Land Availability Map \(2021\)](#)
 - [Portsmouth City Council's Housing Needs and housing targets update \(2021\)](#)
 - [Portsmouth City Council's Economic Development and Regeneration Strategy \(2019\)](#)
 - [Student housing and housing targets \(2021\)](#)
 - [The contribution of windfalls to housing supply \(2021\)](#)
 - [Space Standards background paper \(2021\)](#)
 - [Approach to Affordable Housing \(2021\)](#)
 - [Housing density background paper \(2021\)](#)
 - [Portsmouth City Masterplan Retail Focus Statement \(2020\)](#)
 - [Health background paper and Health Impact Assessment \(2021\)](#)
 - [Portsmouth City Council's Biodiversity Background Paper 2021](#)
 - [Mitigating climate change in Portsmouth background paper \(2021\)](#)
 - [Adapting to climate change in Portsmouth background paper \(2021\)](#)
 - [Heritage and Conservation background paper \(2021\)](#)

The key issues emerging from the policy context and baseline review remain broadly the same as those outlined in 2017, which are presented, as updated, below.

Key Issues

SA-1: Building a strong, competitive economy in Portsmouth

The main issues are:

A supply of land to establish fledgling businesses and grow the existing ones

- Supporting a rise in GVA while also creating a more diverse employment market to create a balanced economy
- Providing suitable water frontage sites to support the marine sector
- Ensuring protection of land to provide a range of locations for new businesses, including small start ups
- Making provision for new facilities for the tourism and visitor economy as well as hotels and conference centres

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- Sixteen areas within the city are deprived and a stronger economy provides more opportunities to work
- Supporting infrastructure is needed to support further growth in the city

SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

The main issues are:

- Ensuring the city centre achieves a mixture of retail, leisure, cultural and evening economy facilities
- Seeing the city centre become a residential and office location to support its diversification
- Adapting to compliment the role of internet shopping
- Allowing Gunwharf to maintain its role for factory outlet retailing to complement the city centre
- Supporting Southsea shopping centre
- Reviewing and supporting the District and Local Centres in Portsmouth
- Creating more office space in the city centre to support its regeneration

SA-3: Promoting sustainable transport in Portsmouth

The main issues are:

- 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

SA-4: To tackle climate change, flooding and coastal change in Portsmouth

The main issues are:

- Reducing greenhouses gases
- Reducing flood risk to new and existing development
- Balancing provision of new defences with the tourist and visitor appeal of the promenade and seafront
- Balancing provision of new defences with the tourist and visitor appeal of the promenade and seafront
- Avoiding coastal squeeze or creating new saltwater habitats to replace those lost where possible
- Achieving high environmental standards on all new buildings, especially in the city centre

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SA-5: Delivering high-quality homes in Portsmouth

The main issues are:

- The housing shortage and the need for affordable, starter homes, provision of self-build plots and the private rented sector
- The need for more family homes, and providing dwellings with sufficient space for storage
- Re-use of brownfield land and problems with decontamination affecting the viability
- Housing for the disabled, the ageing population, young people, graduates and families
- High concentrations of HMOs presenting a challenge to the future sustainability of many of our city's communities

SA-6: To promote healthy communities

The main issues are:

- The high levels of deprivation and the prevalence of poor health and unemployment associated with it
- Improving accessibility to surgeries
- High levels of obesity and the need to get the population more active
- To design out crime
- Energy efficiency and fuel poverty in the existing stock
- The rising amount of dementia as the population ages, together with health care issues for the elderly
- Ensuring access to good quality greenspace

SA-7: Conserving and enhancing the historic townscape

The main issues are:

- Protecting and enhancing the historic environment and cultural townscape
- Encouraging retention of the historic heritage buildings and their reuse
- The careful siting of tall buildings in the context of placemaking
- Will it provide for increased access to and understanding and enjoyment of the historic environment?

SA-8: Requiring good urban design in Portsmouth

The main issues are:

- To ensure higher and bespoke standards of design that provide high quality place making
- To create a compact city with contemporary design and lifestyles
- To create rooftop gardens and green roofs for biodiversity in the city centre
- Creating connections that encourage walking and cycling and a modal shift

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SA-9: To conserve and enhance the natural environment in Portsmouth

The main issues are:

- Ensuring sufficient greenspace in Portsmouth to meet a range of needs from informal recreation to organised sports
- Protect and enhance the Solent European Marine Sites
- Protecting the Sites of Special Scientific Interest and improving them
- Providing a network of Local Wildlife Sites (SINCs) to encourage biodiversity throughout the city
- Mitigation and creation of Suitable Alternative Natural Greenspace (SANGs)
- Water quality in Portsmouth and Langstone Harbour

SA-10: Facilitating the sustainable use of natural resources in Portsmouth

The main issues are:

- To consider waste as a resource along other planning priorities
- Support the ambition of a 'zero waste' economy for Portsmouth
- Ensure sufficient WWTW capacity by keeping local facilities under review
- The need to monitor the availability of the safeguarded land at HM Naval Base and commercial docks
- Encourage the production of secondary and recycled aggregates
- Ensure safeguarded mineral resources and minerals and waste infrastructure are protected from incompatible uses–

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Appendix C - GIS analysis of sites

Developing the appraisal methodology

Given the number of site options and limited site-specific data availability it was not possible to simply discuss ('qualitative analysis') the merits of each site option under the SA framework.²³

As such, work was undertaken to develop a methodology suited to site options appraisal, whilst also reflecting the SA framework and topics as best as possible. The methodology essentially involved employing GIS datasets and measuring ('quantitative analysis') how each site option related to various constraint and opportunity features.

Two GIS tools were used to undertake the appraisal of site options depending on the feature and measurements required. These provided either a:

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Straight line distance from a feature to a site option and percentage overlap of any features within a site option. Measurements were taken from the closest boundary of the site option and the feature.
- or
- Distances calculated from a site option to a feature along a real-world network of roads and urban footpaths using Open Street Map. The network analyst tool helps to provide approximate real-world walking distances. Measurements are taken from the boundary of the site where it is within 20m of the road/ footpath network and is therefore assumed to have access.

The site options appraisal methodology is presented in **Table AC.1** below. It sets out the criteria and thresholds as well as the GIS tool used and provides further commentary as necessary. The table recognises data limitations. It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well/ poorly. The intention is not to indicate a 'significant effect'.²⁴

²³ Qualitative analysis of site options would only have been possible were time/resources available to generate data/understanding for all site options through site visits and discussion with promoters. Without this data/understanding, any attempt at qualitative analysis would have led to a risk of bias (e.g. sites that are being proactively promoted may have been found to perform favourably).

²⁴ Whilst Regulations require that the SA process identifies and evaluates significant effects of the draft plan and reasonable alternatives, there is no assumption that significant effects must be identified and evaluated for all site options considered.

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Table AC.1: Methodology for the assessment of site options

| Criteria | 'RAG' rules | Data and measurement | Commentary |
|--|--|--|--|
| Biodiversity | | | |
| European site (SAC, SPA or Ramsar site) | Red (R) = Within or adjacent Amber (A) = <2km Green (G) = >2km | Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement. | It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This will be dependent on a variety of information, some of which is not available at this stage, such as the precise scale, type, design and layout of development as well as level of mitigation to be provided. It is also important to note that the Local Plan will be subject to Habitats Regulations Assessment and this will consider the likelihood of proposed development having a significant effect on European sites. It should also be noted that all net new housing within 5.6km would contribute to incombination recreational pressure according to current evidence. ²⁵ |
| Parent Goose feeding grounds | Red (R) = Within or adjacent Amber (A) = <100m Green (G) = >100m | Data provided by Portsmouth City Council and Hampshire Biodiveristy Information Centre (HBIC). Straight line distance/ overlap measurement. | As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on biodiversity. This will highlight any sites that contain or are in close proximity to identified Brent Goose feeding grounds. |
| Site of Special Scientific Interest (SSSI) | Red (R) = <200m Amber (A) = <1km Green (G) = >1km | Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement. | As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This criterion will help to highlight the SSSI that lies in closest proximity to the site and together with the criterion below for SSSI Impact Zones, it will help to differentiate between sites. |
| Local Nature Reserve | Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement. | There is one Local Nature Reserves (LNR) situated within the Borough and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than internationally and nationally designated biodiversity. |
| Local Wildlife Sites | Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Portsmouth City Council and does not include sites lying outside of the Borough. Straight line distance/ overlap measurement. | There are a number of SINCS situated within the Borough and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than internationally and nationally designated biodiversity. |

²⁵ Bird Aware Solent

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| Criteria | 'RAG' rules | Data and measurement | Commentary |
|--|---|--|---|
| Priority habitats | Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement. | This seeks to flag if a development at a site could result in the loss of and therefore fragmentation of BAP priority habitats. It also helps to flag if there is the potential for disturbance to priority habitats within 50m of the site. |
| Ecological Network Opportunities | Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Hampshire Biodiveristy Information Centre (HBIC). Straight line distance/ overlap measurement. | This seeks to flag if a sites contains or is in close proximity to an area identified as provided an opportunity for an expanded ecological network in hampshire. |
| Environmental | | | |
| Surface water flood risk | Red (R) = Areas of high or very high surface water flood risk is present in the site Amber (A) = Areas of medium surface water flood risk is present in the site Green (G) = Areas of low or no surface water flood risk | Data provided by Portsmouth City Council. Straight line distance/ overlap measurement. | This criterion will help to identify sites that fall within areas at risk of surface water flooding. N.B. While it is important to avoid development in areas of high flood risk, there is the potential to address risk of surface water flooding at the development management stage through the use of appropriate mitigation, such as SuDS. |
| Southern Water observed flooding point | Amber (A) = Intersects Green (G) = Does not intersect | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | |
| Tree Preservation Order | Red (R) = Intersects Green (G) = Does not intersect | Data provided by Portsmouth City Council and does not include features outside the Borough. Straight line distance/ overlap measurement. | Highlights if a site contains any Tree Preservation Orders (TPOs). |
| Air Quality Management Areas (AQMA) | Red (R) = Within or adjacent to AQMA Amber (A) = <50m from an AQMA | Data provided by Portsmouth City Council. Straight line distance/ overlap measurement. | 50m has been assumed to represent AQMA buffer zones as these are not individually defined. |

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| Criteria | 'RAG' rules | Data and measurement | Commentary |
|-------------------------|---|--|---|
| | Green (G) = >50m from an AQMA | | |
| Conservation Area | Red (R) = Intersects or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Portsmouth City Council and does not include conservation areas outside the Borough. Straight line distance/ overlap measurement. | It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets. Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance based criteria. It will also sometimes be the case that development can enhance heritage assets. |
| Historic Park or Garden | Red (R) = Adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Historic England and includes assets lying outside of the Borough. Straight line distance/ overlap measurement. | As above. |
| Scheduled Monument | Red (R) = Intersects or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Historic England and includes assets lying outside of the Borough. Straight line distance/ overlap measurement. | As above. |
| Listed building | Red (R) = Intersects or is adjacent Amber (A) = <50m Green (G) = >50m | Data provided by Historic England and includes assets lying outside of the Borough. Straight line distance/ overlap measurement. | As above. |
| Locally listed building | Red (R) = Intersects or is adjacent | Data provided by Portsmouth City Council and does not include features | As above. |

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| Criteria | 'RAG' rules | Data and measurement | Commentary |
|------------------------------------|--|--|---|
| | Amber (A) = <50m Green (G) = >50m | outside the Borough. Straight line distance/ overlap measurement. | |
| Archaeology | Red (R) = Intersects Green (G) = Does not intersect | Data provided by Portsmouth City Council and does not include features outside the Borough. Straight line distance/ overlap measurement. | It is assumed that any development within an area of archaeological restraint is more likely to contain archaeology. This does not mean that sites outside these areas cannot contain archaeology and this would be investigated further through any planning applications. |
| Social | | | |
| Strategic & local employment areas | Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | Highlights walking distance to key strategic and local employment areas (industrial and business parks). There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data. |
| Loss of designated employment site | Red (R) = Loss of existing designated employment site Green (G) = No loss of designated employment site | Data provided by Portsmouth City Council. Straight line distance/ overlap measurement. | Considers the loss of an existing or allocated employment area. |
| Town centres | Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | Highlights walking distance to a town centre (Portsmouth City Centre, Southsea Town Centre, District and Local Centres). There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data. |
| Bus stop | Red (R) = >400m Green (G) = <400m | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | Highlights walking distance to a bus stop. Department for Transport guidance ²⁶ suggests 400m as a walkable distance for those accessing a bus stop. |
| Train station | Amber (A) = >800m Green (G) = <800m | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | Highlights walking distance to a train station. Department for Transport guidance ²⁷ does not suggest a walkable distance for a train station so it is assumed that 800m is appropriate. This is in line with what is suggested for access to community facilities. |

²⁶ WebTag (December 2015) Unit A4.2 paragraph 6.4.5, Department for Transport

²⁷ Ibid

- Official -

| Criteria | 'RAG' rules | Data and measurement | Commentary |
|-----------------------|---|--|---|
| School | Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | Highlights walking distance to primary and secondary schools. Department for Transport guidance ²⁸ suggests 800m as a walkable distance for those accessing community facilities. |
| Doctor/ Health Centre | Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m | Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement. | Highlights walking distance to hospitals, GPs and dentists. Department for Transport guidance ²⁹ suggests 800m as a walkable distance for those accessing community facilities. |
| Open space | Red (R) = >400m Amber (A) = <400m Green (G) = Adjacent | Data provided by Portsmouth City Council and includes features outside the Borough. Network analyst measurement. | Highlights the walking distance of site options to important areas of open and green space, which includes allotments and children's play areas). It is recognised that there may be other areas of open or green space that are not considered through this criterion. 400m is assumed to be a walkable distance for most. |
| Open space (loss) | Red (R) = Loss of open or green space Green (G) = No loss of open or green space | Data provided by Portsmouth City Council. Straight line distance/ overlap measurement. | The presumption is that a loss of open space will lead to a negative impact in relation to a range of SA topics. However it should be noted that some loss of open space may not necessarily be a negative effect if green infrastructure enhancements are initiated on-site or nearby but this is uncertain at this stage |
| Deprivation | Red (R) = Site does not intersect with an 'output area' that is relatively deprived Amber (A) = Any of the site intersects with an 'output area' that is relatively deprived i.e. in the 20-40% (2nd quintile) most deprived in the district. Green (G) = Any of the site intersects with an 'output | Data provided by Ministry of Housing, Communities and Local Government and includes features outside the Borough. Straight line distance/ overlap measurement. | Highlights site options that fall within an area of deprivation. Development in an area of relative deprivation (as measured by the Index of Multiple Deprivation) may support regeneration. However, it is recognised that this will be dependent on a variety of factors, including the level of improvements delivered in terms of community facilities. |

²⁸ Ibid²⁹ Ibid

- Official -

| Criteria | 'RAG' rules | Data and measurement | Commentary |
|----------|---|----------------------|------------|
| | area' that is relatively deprived (i.e. in the 0-20% (1st quintile) most deprived in the district | | |

Appraisal findings

Tables AC.2-AC.4 present appraisal findings in relation to the site options that have been a focus of plan-making. Specifically, the table presents an appraisal of the site options in terms of the appraisal criteria set out in Table AC.1, with performance categorised on a simple 'RAG' scale.

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Table AC.2: Assessment of site options (Biodiversity)

| HELAA Ref | European Site (SAC, SPA or Ramsar) | Distance to Nearest Brent Goose Core Area (m) | Distance to Nearest Brent Goose Primary Support Area (m) | Distance to Nearest Brent Goose Secondary Support Area (m) | Distance to Nearest Brent Goose Low Use (m) | Distance to Nearest Brent Goose Candidate Area (m) | Distance to Nearest Brent Goose SPA Site (m) | Distance to Nearest SSSI (m) | Distance to Nearest Local Nature Reserve (m) | Distance to Nearest Local Wildlife Site (m) | Distance to Nearest Priority Habitat (m) | Distance to Nearest Ecological Network Opportunities (m) |
|-----------|------------------------------------|---|--|--|---|--|--|------------------------------|--|---|--|--|
| ST01 | G | G | G | G | G | G | G | G | G | G | G | A |
| CS01 | G | G | G | G | G | G | G | G | G | G | G | G |
| COP01 | G | G | G | G | G | G | G | G | G | G | G | G |
| CS02 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE06 | G | G | G | G | G | G | G | G | G | G | G | G |
| FR02 | G | G | G | G | G | G | G | G | G | G | G | G |
| DF02 | G | G | G | G | G | G | G | G | G | G | A | G |
| HI05 | G | G | G | G | G | G | G | G | G | G | R | R |
| ST03 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST04 | A | G | G | G | G | G | G | G | G | G | G | A |
| DF03 | G | G | G | G | R | G | G | G | G | G | G | R |
| EC04 | A | A | G | G | G | G | G | G | G | G | G | G |
| CD01 | G | G | G | G | G | G | G | G | G | G | A | A |
| CD02 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST08 | A | G | G | G | G | G | G | G | G | G | G | A |
| ST09 | G | G | G | G | G | G | G | G | G | G | G | A |
| COP02 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE02 | G | G | G | G | G | G | G | G | G | G | G | A |
| CD03 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD04 | A | G | G | G | A | G | G | G | G | G | G | G |
| PA03 | A | G | G | G | G | G | A | A | G | G | A | A |

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| HELAA Ref | European Site (SAC, SPA or Ramsar) | Distance to Nearest Brent Goose Core Area (m) | Distance to Nearest Brent Goose Primary Support Area (m) | Distance to Nearest Brent Goose Secondary Support Area (m) | Distance to Nearest Brent Goose Low Use (m) | Distance to Nearest Brent Goose Candidate Area (m) | Distance to Nearest Brent Goose SPA Site (m) | Distance to Nearest SSSI (m) | Distance to Nearest Local Nature Reserve (m) | Distance to Nearest Local Wildlife Site (m) | Distance to Nearest Priority Habitat (m) | Distance to Nearest Ecological Network Opportunities (m) |
|-----------|------------------------------------|---|--|--|---|--|--|------------------------------|--|---|--|--|
| NE03 | G | G | G | G | G | G | G | G | G | G | G | G |
| DF05 | G | G | G | G | G | G | G | G | G | R | A | R |
| BA01 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD05 | A | G | G | G | A | G | G | G | G | G | G | G |
| CD07 | G | G | G | G | G | G | G | G | G | G | G | G |
| EC07 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD06 | G | G | G | G | G | G | G | G | G | G | G | G |
| FR03 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD10 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD09 | G | G | G | G | G | G | G | G | G | G | G | G |
| HI01 | G | G | G | G | G | G | G | G | G | G | G | G |
| FR04 | G | G | G | G | G | G | G | G | G | G | G | G |
| PA04 | G | G | G | G | G | G | G | G | G | G | G | G |
| SJ02 | G | G | G | G | G | G | G | G | G | G | G | G |
| FR01 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST07 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE07 | G | G | G | G | G | G | G | G | G | G | G | G |
| EC08 | G | G | G | G | G | G | G | G | G | G | G | G |
| SJ04 | G | G | G | G | G | G | G | G | G | G | G | G |
| COP03 | G | G | G | G | G | G | G | G | G | G | G | G |
| DF06 | A | G | G | A | R | G | G | A | A | G | A | R |
| CD15 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE09 | G | G | G | G | G | G | G | G | G | G | G | G |

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| HELAA Ref | European Site (SAC, SPA or Ramsar) | Distance to Nearest Brent Goose Core Area (m) | Distance to Nearest Brent Goose Primary Support Area (m) | Distance to Nearest Brent Goose Secondary Support Area (m) | Distance to Nearest Brent Goose Low Use (m) | Distance to Nearest Brent Goose Candidate Area (m) | Distance to Nearest Brent Goose SPA Site (m) | Distance to Nearest SSSI (m) | Distance to Nearest Local Nature Reserve (m) | Distance to Nearest Local Wildlife Site (m) | Distance to Nearest Priority Habitat (m) | Distance to Nearest Ecological Network Opportunities (m) |
|-----------|------------------------------------|---|--|--|---|--|--|------------------------------|--|---|--|--|
| CD13 | G | G | G | G | G | G | G | G | G | G | G | G |
| PA01 | A | A | G | A | G | G | A | A | G | G | A | R |
| HIO4 | G | G | G | G | G | G | G | G | G | G | A | R |
| EC11 | R | G | G | A | G | G | G | R | G | A | R | R |
| COS01 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD16 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST12 | A | G | G | G | G | G | G | G | G | G | G | A |
| CD18 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD17 | G | G | G | G | G | G | G | G | G | G | G | G |
| COS04 | G | G | G | G | G | G | G | G | G | G | G | A |
| COS03 | G | G | G | G | G | G | G | G | G | G | G | G |
| MI01 | A | R | G | R | G | G | G | A | G | R | R | R |
| MI02 | G | G | G | G | G | G | G | G | G | G | G | R |
| HIO8 | G | G | G | G | G | G | G | G | G | G | G | A |
| PA08 | G | G | G | G | G | G | G | G | G | G | G | G |
| SJ06 | G | G | G | G | G | G | G | G | G | G | G | A |
| SJ08 | G | G | G | G | G | G | G | G | G | G | G | A |
| ST02 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST14 | G | G | G | G | G | G | G | G | G | G | G | G |
| DF07 | G | G | G | G | G | G | G | G | G | G | G | R |
| CD20 | G | G | G | G | G | G | G | G | G | G | G | G |
| BA02 | G | G | G | G | G | G | G | G | G | G | G | G |
| COP04 | A | G | G | G | A | G | G | G | G | A | A | R |

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| HELAA Ref | European Site (SAC, SPA or Ramsar) | Distance to Nearest Brent Goose Core Area (m) | Distance to Nearest Brent Goose Primary Support Area (m) | Distance to Nearest Brent Goose Secondary Support Area (m) | Distance to Nearest Brent Goose Low Use (m) | Distance to Nearest Brent Goose Candidate Area (m) | Distance to Nearest Brent Goose SPA Site (m) | Distance to Nearest SSSI (m) | Distance to Nearest Local Nature Reserve (m) | Distance to Nearest Local Wildlife Site (m) | Distance to Nearest Priority Habitat (m) | Distance to Nearest Ecological Network Opportunities (m) |
|-----------|------------------------------------|---|--|--|---|--|--|------------------------------|--|---|--|--|
| COP05 | A | G | G | G | A | G | G | G | G | R | R | R |
| CD22 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD30 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD31 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD32 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD26 | G | G | G | G | G | G | G | G | G | G | R | A |
| CD25 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD23 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD29 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD28 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE05 | G | G | G | G | G | G | G | G | G | G | G | G |
| COS02 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD65 | G | G | G | G | G | G | G | G | G | G | G | G |
| BA03 | G | G | G | G | G | G | G | G | G | G | G | A |
| PA05A | G | G | G | G | G | G | G | A | G | G | A | R |
| DF08 | A | G | G | G | A | G | G | A | G | G | A | R |
| COP07 | G | G | G | G | G | G | G | G | G | G | G | A |
| CD37 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD34 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD49 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD51 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD63 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD64 | G | G | G | G | G | G | G | G | G | G | G | G |

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| HELAA Ref | European Site (SAC, SPA or Ramsar) | Distance to Nearest Brent Goose Core Area (m) | Distance to Nearest Brent Goose Primary Support Area (m) | Distance to Nearest Brent Goose Secondary Support Area (m) | Distance to Nearest Brent Goose Low Use (m) | Distance to Nearest Brent Goose Candidate Area (m) | Distance to Nearest Brent Goose SPA Site (m) | Distance to Nearest SSSI (m) | Distance to Nearest Local Nature Reserve (m) | Distance to Nearest Local Wildlife Site (m) | Distance to Nearest Priority Habitat (m) | Distance to Nearest Ecological Network Opportunities (m) |
|-----------|------------------------------------|---|--|--|---|--|--|------------------------------|--|---|--|--|
| ST17 | R | A | G | G | A | G | G | G | G | G | G | R |
| CD21 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST05 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD11 | G | G | G | G | G | G | G | G | G | G | G | G |
| HIO2 | G | G | G | G | G | G | G | G | G | G | G | G |
| POS06 | G | G | G | G | G | G | G | G | G | G | G | A |
| EC01 | R | G | R | G | R | G | G | R | G | R | R | R |
| CCOS10 | A | G | G | R | G | G | G | A | G | G | R | R |
| SJ15 | G | G | G | G | G | G | G | G | G | G | G | A |
| HIO6 | G | G | G | G | G | G | G | G | G | G | A | R |
| CD74 | G | G | G | G | G | G | G | G | G | G | G | G |
| CS06 | G | G | G | G | G | G | G | G | G | G | G | G |
| CD75 | G | G | G | G | G | G | G | G | G | G | G | G |
| FR06 | G | G | G | G | G | G | G | G | G | G | G | G |
| MI07 | G | G | G | G | G | G | G | G | G | G | G | G |
| MI03 | G | G | G | G | G | G | G | G | G | G | G | G |
| EC14 | A | A | A | G | G | G | G | G | G | R | R | G |
| CD73 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE20 | G | G | G | G | A | G | G | G | G | G | G | G |
| PA15 | G | G | G | G | G | G | G | G | G | G | G | A |
| SJ12 | G | G | G | G | G | G | G | G | G | G | G | G |
| SJ16 | G | G | G | G | G | G | G | G | G | G | G | A |
| NE21 | G | G | G | G | G | G | G | G | G | G | G | G |

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| HELAA Ref | European Site (SAC, SPA or Ramsar) | Distance to Nearest Brent Goose Core Area (m) | Distance to Nearest Brent Goose Primary Support Area (m) | Distance to Nearest Brent Goose Secondary Support Area (m) | Distance to Nearest Brent Goose Low Use (m) | Distance to Nearest Brent Goose Candidate Area (m) | Distance to Nearest Brent Goose SPA Site (m) | Distance to Nearest SSSI (m) | Distance to Nearest Local Nature Reserve (m) | Distance to Nearest Local Wildlife Site (m) | Distance to Nearest Priority Habitat (m) | Distance to Nearest Ecological Network Opportunities (m) |
|-----------|------------------------------------|---|--|--|---|--|--|------------------------------|--|---|--|--|
| NE22 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE18 | R | G | G | R | R | G | R | R | G | G | R | R |
| ST11 | G | G | G | G | G | G | G | G | G | G | G | G |
| EC02B | G | A | G | G | G | G | G | G | G | G | G | G |
| NE19B | R | G | R | R | G | G | R | R | G | G | R | R |
| ST01 | G | G | G | G | G | G | G | G | G | G | G | A |
| CS01 | G | G | G | G | G | G | G | G | G | G | G | G |
| SCOP01 | G | G | G | G | G | G | G | G | G | G | G | G |
| CS02 | G | G | G | G | G | G | G | G | G | G | G | G |
| NE06 | G | G | G | G | G | G | G | G | G | G | G | G |
| FR02 | G | G | G | G | G | G | G | G | G | G | G | G |
| DF02 | G | G | G | G | G | G | G | G | G | G | A | G |
| HI05 | G | G | G | G | G | G | G | G | G | G | R | R |
| ST03 | G | G | G | G | G | G | G | G | G | G | G | G |
| ST04 | A | G | G | G | G | G | G | G | G | G | G | A |
| DF03 | G | G | G | G | R | G | G | G | G | G | G | R |
| EC04 | A | A | G | G | G | G | G | G | G | G | G | G |
| CD01 | G | G | G | G | G | G | G | G | G | G | A | A |
| CD02 | G | G | G | G | G | G | G | G | G | G | G | G |

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Table AC.3: Assessment of site options (Environmental)

| HELAA Ref | Fluvial flood risk | Distance to Nearest Surface Water Hotspot (m) | Distance to Nearest Southern Water Observed Flooding Point (m) | Distance to Nearest TPO (m) | Distance to Nearest AQMA (m) | Distance to Nearest Conservation Area (m) | Distance to Nearest Historic Park or Garden (m) | Distance to Nearest Scheduled Monument (m) | Distance to Nearest Listed Building (m) | Distance to Nearest Locally Listed Building (m) | Distance to Nearest Area of Archaeological Restraint (m) |
|-----------|--------------------|---|--|-----------------------------|------------------------------|---|---|--|---|---|--|
| ST01 | G | G | G | R | R | G | G | G | A | A | R |
| CS01 | G | G | G | G | G | G | G | G | G | G | G |
| COP01 | G | G | G | G | G | G | G | G | G | G | G |
| CS02 | G | G | G | G | G | G | G | G | G | G | G |
| NE06 | G | G | G | G | G | R | G | G | G | A | R |
| DFR02 | G | G | G | G | G | A | G | G | G | G | R |
| DF02 | R | R | G | G | G | G | G | G | G | G | G |
| HI05 | R | G | G | G | R | G | G | G | G | G | R |
| ST03 | G | G | G | A | R | G | G | G | G | G | G |
| ST04 | G | G | G | A | G | G | G | A | G | G | R |
| DF03 | A | G | G | G | R | G | G | G | G | G | G |
| EC04 | G | G | G | R | R | G | G | R | R | G | G |
| CD01 | G | G | G | R | G | G | A | G | R | A | R |
| CD02 | G | G | G | G | G | G | G | G | G | G | G |
| ST08 | G | G | G | R | G | A | G | G | A | G | R |
| ST09 | G | G | G | G | G | G | G | G | G | G | G |
| COP02 | G | G | G | G | G | G | G | G | G | G | G |
| NE02 | R | R | G | G | G | G | G | G | G | G | G |
| CD03 | G | G | G | G | G | G | G | G | G | G | R |
| CD04 | G | G | G | A | G | A | G | G | A | A | R |
| PA03 | R | G | G | G | G | G | G | G | G | G | G |

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| HELAA Ref | Fluvial flood risk | Distance to Nearest Surface Water Hotspot (m) | Distance to Nearest Southern Water Observed Flooding Point (m) | Distance to Nearest TPO (m) | Distance to Nearest AQMA (m) | Distance to Nearest Conservation Area (m) | Distance to Nearest Historic Park or Garden (m) | Distance to Nearest Scheduled Monument (m) | Distance to Nearest Listed Building (m) | Distance to Nearest Locally Listed Building (m) | Distance to Nearest Area of Archaeological Restraint (m) |
|-----------|--------------------|---|--|-----------------------------|------------------------------|---|---|--|---|---|--|
| NE03 | G | G | G | G | G | A | G | G | A | G | R |
| DF05 | G | G | G | G | G | G | G | A | G | G | R |
| BA01 | G | G | G | G | G | G | G | G | G | G | R |
| CD05 | G | G | G | A | G | G | G | G | A | G | R |
| CD07 | G | G | G | G | G | R | G | G | G | A | R |
| EC07 | R | G | G | G | R | G | G | G | A | A | G |
| CD06 | G | R | G | A | G | G | G | G | A | G | R |
| FR03 | G | G | G | G | G | A | G | G | G | G | R |
| CD10 | G | G | G | G | G | G | G | G | G | G | G |
| CD09 | G | G | G | G | G | A | G | G | G | G | R |
| HI01 | G | G | G | G | R | G | G | G | G | G | R |
| FR04 | G | G | G | G | G | R | G | G | G | G | R |
| PA04 | G | G | G | G | G | G | G | G | G | G | G |
| SJ02 | G | G | G | A | G | G | G | G | A | G | G |
| FR01 | G | G | G | G | G | R | G | G | G | A | R |
| ST07 | G | G | G | G | G | G | G | G | G | G | G |
| NE07 | G | G | G | G | G | R | G | G | G | G | R |
| EC08 | R | G | G | G | G | G | G | G | G | G | G |
| SJ04 | R | G | G | R | G | G | G | G | G | A | G |
| COP03 | G | G | G | G | G | G | G | G | G | G | G |
| DF06 | R | R | G | G | G | G | G | G | G | G | G |
| CD15 | G | G | G | G | G | G | G | G | G | G | G |
| NE09 | G | G | G | G | G | R | G | G | G | A | R |

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| HELAA Ref | Fluvial flood risk | Distance to Nearest Surface Water Hotspot (m) | Distance to Nearest Southern Water Observed Flooding Point (m) | Distance to Nearest TPO (m) | Distance to Nearest AQMA (m) | Distance to Nearest Conservation Area (m) | Distance to Nearest Historic Park or Garden (m) | Distance to Nearest Scheduled Monument (m) | Distance to Nearest Listed Building (m) | Distance to Nearest Locally Listed Building (m) | Distance to Nearest Area of Archaeological Restraint (m) |
|-----------|--------------------|---|--|-----------------------------|------------------------------|---|---|--|---|---|--|
| CD13 | G | G | G | A | G | A | G | G | A | A | R |
| PA01 | A | G | G | G | G | G | G | G | G | G | G |
| H104 | R | R | G | G | R | G | G | G | G | G | R |
| EC11 | R | G | G | G | G | G | G | A | G | G | G |
| COS01 | G | R | G | G | G | G | G | G | G | G | R |
| CD16 | G | G | G | G | G | G | G | G | A | G | G |
| ST12 | R | G | G | R | G | G | G | G | A | A | R |
| CD18 | G | G | G | G | G | G | G | G | A | G | G |
| CD17 | G | G | G | R | R | R | G | G | R | R | R |
| COS04 | G | R | G | G | G | G | G | G | G | G | R |
| COS03 | G | G | G | G | R | G | G | G | A | G | R |
| MI01 | A | G | G | G | R | G | G | G | R | A | R |
| MI02 | G | G | G | G | G | A | G | G | G | G | R |
| H108 | A | R | G | G | R | G | G | G | G | R | R |
| PA08 | G | G | G | G | G | G | G | G | G | G | R |
| SJ06 | R | G | G | R | R | G | G | G | G | G | G |
| SJ08 | A | G | G | R | G | G | G | G | A | G | G |
| ST02 | G | G | G | G | G | G | G | G | G | G | G |
| ST14 | G | G | G | A | G | G | G | G | A | A | G |
| DF07 | R | R | G | G | G | G | G | G | G | G | G |
| CD20 | G | G | G | G | G | G | G | G | G | G | G |
| BA02 | G | G | G | G | G | G | G | G | G | G | G |
| COP04 | R | R | G | A | G | G | G | A | G | G | R |

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| HELAA Ref | Fluvial flood risk | Distance to Nearest Surface Water Hotspot (m) | Distance to Nearest Southern Water Observed Flooding Point (m) | Distance to Nearest TPO (m) | Distance to Nearest AQMA (m) | Distance to Nearest Conservation Area (m) | Distance to Nearest Historic Park or Garden (m) | Distance to Nearest Scheduled Monument (m) | Distance to Nearest Listed Building (m) | Distance to Nearest Locally Listed Building (m) | Distance to Nearest Area of Archaeological Restraint (m) |
|-----------|--------------------|---|--|-----------------------------|------------------------------|---|---|--|---|---|--|
| COP05 | R | R | G | R | G | G | G | R | G | G | R |
| CD22 | G | G | G | G | G | G | G | G | G | G | G |
| CD30 | G | G | G | G | G | G | G | G | G | G | G |
| CD31 | G | G | G | G | G | G | G | G | G | G | G |
| CD32 | G | G | G | G | G | G | G | G | G | G | G |
| CD26 | G | G | G | R | G | G | G | G | A | G | G |
| CD25 | G | G | G | G | G | G | G | G | G | G | G |
| CD23 | G | G | G | R | G | A | G | G | A | A | G |
| CD29 | G | G | G | G | G | G | G | G | G | A | G |
| CD28 | G | G | G | G | G | G | G | G | A | A | G |
| NE05 | G | G | G | G | G | G | G | G | G | G | G |
| COS02 | G | R | G | G | G | G | G | G | G | G | R |
| CD65 | G | G | G | G | G | R | G | G | A | A | R |
| BA03 | G | G | G | G | G | G | G | G | G | G | G |
| PA05A | G | G | G | G | G | G | G | G | G | G | R |
| DF08 | R | G | G | G | G | G | G | G | G | G | G |
| COP07 | G | G | G | G | R | G | G | G | G | G | G |
| CD37 | G | G | G | G | G | G | G | G | G | G | G |
| CD34 | G | G | G | G | G | G | G | G | G | G | G |
| CD49 | G | G | G | G | G | G | G | G | G | G | G |
| CD51 | G | G | G | G | G | G | G | G | A | G | G |
| CD63 | G | G | G | G | G | G | G | G | G | G | G |
| CD64 | G | G | G | G | G | G | G | G | G | G | G |

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| HELAA Ref | Fluvial flood risk | Distance to Nearest Surface Water Hotspot (m) | Distance to Nearest Southern Water Observed Flooding Point (m) | Distance to Nearest TPO (m) | Distance to Nearest AQMA (m) | Distance to Nearest Conservation Area (m) | Distance to Nearest Historic Park or Garden (m) | Distance to Nearest Scheduled Monument (m) | Distance to Nearest Listed Building (m) | Distance to Nearest Locally Listed Building (m) | Distance to Nearest Area of Archaeological Restraint (m) |
|-----------|--------------------|---|--|-----------------------------|------------------------------|---|---|--|---|---|--|
| ST17 | R | G | G | R | G | G | A | G | G | G | R |
| CD21 | G | G | G | G | R | G | G | G | G | A | G |
| ST05 | G | G | G | R | G | R | G | G | G | A | G |
| CD11 | G | G | G | G | G | R | G | G | G | G | R |
| HIO2 | G | G | G | G | G | R | G | G | G | A | G |
| POS06 | G | R | G | G | G | G | G | G | G | G | R |
| REC01 | A | G | G | G | G | G | G | R | A | G | G |
| CCOS10 | R | G | G | G | R | G | G | G | G | G | R |
| SJ15 | G | G | G | R | R | G | G | G | R | R | G |
| HIO6 | R | R | G | A | R | G | G | A | A | G | R |
| CD74 | G | G | G | G | G | G | G | G | G | G | G |
| CS06 | G | G | G | G | G | G | G | G | G | G | G |
| CD75 | G | G | G | G | G | R | G | G | G | G | R |
| FR06 | G | G | G | G | G | G | G | G | G | R | G |
| MI07 | G | G | G | G | G | G | G | G | G | G | G |
| MI03 | G | G | G | G | G | R | G | G | G | G | R |
| EC14 | G | G | G | G | G | G | G | G | R | G | G |
| CD73 | G | G | G | G | G | G | G | G | G | G | G |
| NE20 | G | G | G | G | G | G | G | G | G | G | G |
| PA15 | G | G | G | G | G | G | G | G | G | G | G |
| SJ12 | R | R | G | R | G | G | G | G | G | G | G |
| SJ16 | R | R | G | G | G | G | G | G | G | G | G |
| NE21 | G | G | G | G | G | G | G | G | G | A | R |

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| HELAA Ref | Fluvial flood risk | Distance to Nearest Surface Water Hotspot (m) | Distance to Nearest Southern Water Observed Flooding Point (m) | Distance to Nearest TPO (m) | Distance to Nearest AQMA (m) | Distance to Nearest Conservation Area (m) | Distance to Nearest Historic Park or Garden (m) | Distance to Nearest Scheduled Monument (m) | Distance to Nearest Listed Building (m) | Distance to Nearest Locally Listed Building (m) | Distance to Nearest Area of Archaeological Restraint (m) |
|-----------|--------------------|---|--|-----------------------------|------------------------------|---|---|--|---|---|--|
| NE22 | G | G | G | G | G | R | G | G | A | G | R |
| NE18 | R | G | G | G | G | G | G | G | G | G | G |
| ST11 | G | G | G | R | G | A | G | G | A | A | G |
| EC02B | G | G | G | G | R | G | G | G | G | G | G |
| NE19B | R | G | G | G | G | G | G | G | R | G | R |
| ST01 | G | G | G | R | R | G | G | G | A | A | R |
| CS01 | G | G | G | G | G | G | G | G | G | G | G |
| PCOP01 | G | G | G | G | G | G | G | G | G | G | G |
| CS02 | G | G | G | G | G | G | G | G | G | G | G |
| NE06 | G | G | G | G | G | R | G | G | G | A | R |
| FR02 | G | G | G | G | G | A | G | G | G | G | R |
| DF02 | R | R | G | G | G | G | G | G | G | G | G |
| HI05 | R | G | G | G | R | G | G | G | G | G | R |
| ST03 | G | G | G | A | R | G | G | G | G | G | G |
| ST04 | G | G | G | A | G | G | G | A | G | G | R |
| DF03 | A | G | G | G | R | G | G | G | G | G | G |
| EC04 | G | G | G | R | R | G | G | R | R | G | G |
| CD01 | G | G | G | R | G | G | A | G | R | A | R |
| CD02 | G | G | G | G | G | G | G | G | G | G | G |

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Table AC.4: Assessment of site options (Social)

| HELAA Ref | Strategic & local employment areas (distance) | Loss of Designated Employment Site | District and Local Centre (m) | Distance to Nearest Bus Stop (m) | Distance to Nearest Train Station (m) | Distance to Nearest Primary School (m) | Distance to Nearest Secondary School (m) | Distance to Nearest Doctor/ Health Centre (m) | Distance to Nearest Open Space | Loss of Open Space | Development in Area of Relative Deprivation |
|-----------|---|------------------------------------|-------------------------------|----------------------------------|---------------------------------------|--|--|---|--------------------------------|--------------------|---|
| ST01 | G | G | G | R | R | G | G | G | A | A | R |
| CS01 | G | G | G | G | G | G | G | G | G | G | G |
| COP01 | G | G | G | G | G | G | G | G | G | G | G |
| CS02 | G | G | G | G | G | G | G | G | G | G | G |
| NE06 | G | G | G | G | G | R | G | G | G | A | R |
| FR02 | G | G | G | G | G | A | G | G | G | G | R |
| DF02 | R | R | G | G | G | G | G | G | G | G | G |
| CHIO5 | R | G | G | G | R | G | G | G | G | G | R |
| ST03 | G | G | G | A | R | G | G | G | G | G | G |
| ST04 | G | G | G | A | G | G | G | A | G | G | R |
| DF03 | A | G | G | G | R | G | G | G | G | G | G |
| EC04 | G | G | G | R | R | G | G | R | R | G | G |
| CD01 | G | G | G | R | G | G | A | G | R | A | R |
| CD02 | G | G | G | G | G | G | G | G | G | G | G |
| ST08 | G | G | G | R | G | A | G | G | A | G | R |
| ST09 | G | G | G | G | G | G | G | G | G | G | G |
| COP02 | G | G | G | G | G | G | G | G | G | G | G |
| NE02 | R | R | G | G | G | G | G | G | G | G | G |
| CD03 | G | G | G | G | G | G | G | G | G | G | R |
| CD04 | G | G | G | A | G | A | G | G | A | A | R |
| PA03 | R | G | G | G | G | G | G | G | G | G | G |
| NE03 | G | G | G | G | G | A | G | G | A | G | R |
| DF05 | G | G | G | G | G | G | G | A | G | G | R |

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| HELAA Ref | Strategic & local employment areas (distance) | Loss of Designated Employment Site | District and Local Centre (m) | Distance to Nearest Bus Stop (m) | Distance to Nearest Train Station (m) | Distance to Nearest Primary School (m) | Distance to Nearest Secondary School (m) | Distance to Nearest Doctor/ Health Centre (m) | Distance to Nearest Open Space | Loss of Open Space | Development in Area of Relative Deprivation |
|-----------|---|------------------------------------|-------------------------------|----------------------------------|---------------------------------------|--|--|---|--------------------------------|--------------------|---|
| BA01 | G | G | G | G | G | G | G | G | G | G | R |
| CD05 | G | G | G | A | G | G | G | G | A | G | R |
| CD07 | G | G | G | G | G | R | G | G | G | A | R |
| EC07 | R | G | G | G | R | G | G | G | A | A | G |
| CD06 | G | R | G | A | G | G | G | G | A | G | R |
| FR03 | G | G | G | G | G | A | G | G | G | G | R |
| CD10 | G | G | G | G | G | G | G | G | G | G | G |
| CD09 | G | G | G | G | G | A | G | G | G | G | R |
| HIO1 | G | G | G | G | R | G | G | G | G | G | R |
| FR04 | G | G | G | G | G | R | G | G | G | G | R |
| PA04 | G | G | G | G | G | G | G | G | G | G | G |
| SJ02 | G | G | G | A | G | G | G | G | A | G | G |
| FR01 | G | G | G | G | G | R | G | G | G | A | R |
| ST07 | G | G | G | G | G | G | G | G | G | G | G |
| NE07 | G | G | G | G | G | R | G | G | G | G | R |
| EC08 | R | G | G | G | G | G | G | G | G | G | G |
| SJ04 | R | G | G | R | G | G | G | G | G | A | G |
| COP03 | G | G | G | G | G | G | G | G | G | G | G |
| DF06 | R | R | G | G | G | G | G | G | G | G | G |
| CD15 | G | G | G | G | G | G | G | G | G | G | G |
| NE09 | G | G | G | G | G | R | G | G | G | A | R |
| CD13 | G | G | G | A | G | A | G | G | A | A | R |
| PA01 | A | G | G | G | G | G | G | G | G | G | G |
| HIO4 | R | R | G | G | R | G | G | G | G | G | R |

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| HELAA Ref | Strategic & local employment areas (distance) | Loss of Designated Employment Site | District and Local Centre (m) | Distance to Nearest Bus Stop (m) | Distance to Nearest Train Station (m) | Distance to Nearest Primary School (m) | Distance to Nearest Secondary School (m) | Distance to Nearest Doctor/ Health Centre (m) | Distance to Nearest Open Space | Loss of Open Space | Development in Area of Relative Deprivation |
|-----------|---|------------------------------------|-------------------------------|----------------------------------|---------------------------------------|--|--|---|--------------------------------|--------------------|---|
| EC11 | R | G | G | G | G | G | G | A | G | G | G |
| COS01 | G | R | G | G | G | G | G | G | G | G | R |
| CD16 | G | G | G | G | G | G | G | G | A | G | G |
| ST12 | R | G | G | R | G | G | G | G | A | A | R |
| CD18 | G | G | G | G | G | G | G | G | A | G | G |
| CD17 | G | G | G | R | R | R | G | G | R | R | R |
| COS04 | G | R | G | G | G | G | G | G | G | G | R |
| COS03 | G | G | G | G | R | G | G | G | A | G | R |
| MI01 | A | G | G | G | R | G | G | G | R | A | R |
| MI02 | G | G | G | G | G | A | G | G | G | G | R |
| HI08 | A | R | G | G | R | G | G | G | G | R | R |
| PA08 | G | G | G | G | G | G | G | G | G | G | R |
| SJ06 | R | G | G | R | R | G | G | G | G | G | G |
| SJ08 | A | G | G | R | G | G | G | G | A | G | G |
| ST02 | G | G | G | G | G | G | G | G | G | G | G |
| ST14 | G | G | G | A | G | G | G | G | A | A | G |
| DF07 | R | R | G | G | G | G | G | G | G | G | G |
| CD20 | G | G | G | G | G | G | G | G | G | G | G |
| BA02 | G | G | G | G | G | G | G | G | G | G | G |
| COP04 | R | R | G | A | G | G | G | A | G | G | R |
| COP05 | R | R | G | R | G | G | G | R | G | G | R |
| CD22 | G | G | G | G | G | G | G | G | G | G | G |
| CD30 | G | G | G | G | G | G | G | G | G | G | G |
| CD31 | G | G | G | G | G | G | G | G | G | G | G |

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| HELAA Ref | Strategic & local employment areas (distance) | Loss of Designated Employment Site | District and Local Centre (m) | Distance to Nearest Bus Stop (m) | Distance to Nearest Train Station (m) | Distance to Nearest Primary School (m) | Distance to Nearest Secondary School (m) | Distance to Nearest Doctor/ Health Centre (m) | Distance to Nearest Open Space | Loss of Open Space | Development in Area of Relative Deprivation |
|-----------|---|------------------------------------|-------------------------------|----------------------------------|---------------------------------------|--|--|---|--------------------------------|--------------------|---|
| CD32 | G | G | G | G | G | G | G | G | G | G | G |
| CD26 | G | G | G | R | G | G | G | G | A | G | G |
| CD25 | G | G | G | G | G | G | G | G | G | G | G |
| CD23 | G | G | G | R | G | A | G | G | A | A | G |
| CD29 | G | G | G | G | G | G | G | G | G | A | G |
| CD28 | G | G | G | G | G | G | G | G | A | A | G |
| NE05 | G | G | G | G | G | G | G | G | G | G | G |
| COS02 | G | R | G | G | G | G | G | G | G | G | R |
| CD65 | G | G | G | G | G | R | G | G | A | A | R |
| BA03 | G | G | G | G | G | G | G | G | G | G | G |
| PA05A | G | G | G | G | G | G | G | G | G | G | R |
| DF08 | R | G | G | G | G | G | G | G | G | G | G |
| COP07 | G | G | G | G | R | G | G | G | G | G | G |
| CD37 | G | G | G | G | G | G | G | G | G | G | G |
| CD34 | G | G | G | G | G | G | G | G | G | G | G |
| CD49 | G | G | G | G | G | G | G | G | G | G | G |
| CD51 | G | G | G | G | G | G | G | G | A | G | G |
| CD63 | G | G | G | G | G | G | G | G | G | G | G |
| CD64 | G | G | G | G | G | G | G | G | G | G | G |
| ST17 | R | G | G | R | G | G | A | G | G | G | R |
| CD21 | G | G | G | G | R | G | G | G | G | A | G |
| ST05 | G | G | G | R | G | R | G | G | G | A | G |
| CD11 | G | G | G | G | G | R | G | G | G | G | R |
| HIO2 | G | G | G | G | G | R | G | G | G | A | G |

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| HELAA Ref | Strategic & local employment areas (distance) | Loss of Designated Employment Site | District and Local Centre (m) | Distance to Nearest Bus Stop (m) | Distance to Nearest Train Station (m) | Distance to Nearest Primary School (m) | Distance to Nearest Secondary School (m) | Distance to Nearest Doctor/ Health Centre (m) | Distance to Nearest Open Space | Loss of Open Space | Development in Area of Relative Deprivation |
|-----------|---|------------------------------------|-------------------------------|----------------------------------|---------------------------------------|--|--|---|--------------------------------|--------------------|---|
| COS06 | G | R | G | G | G | G | G | G | G | G | R |
| EC01 | A | G | G | G | G | G | G | R | A | G | G |
| COS10 | R | G | G | G | R | G | G | G | G | G | R |
| SJ15 | G | G | G | R | R | G | G | G | R | R | G |
| HIO6 | R | R | G | A | R | G | G | A | A | G | R |
| CD74 | G | G | G | G | G | G | G | G | G | G | G |
| CS06 | G | G | G | G | G | G | G | G | G | G | G |
| CD75 | G | G | G | G | G | R | G | G | G | G | R |
| FR06 | G | G | G | G | G | G | G | G | G | R | G |
| MI07 | G | G | G | G | G | G | G | G | G | G | G |
| MI03 | G | G | G | G | G | R | G | G | G | G | R |
| EC14 | G | G | G | G | G | G | G | G | R | G | G |
| CD73 | G | G | G | G | G | G | G | G | G | G | G |
| NE20 | G | G | G | G | G | G | G | G | G | G | G |
| PA15 | G | G | G | G | G | G | G | G | G | G | G |
| SJ12 | R | R | G | R | G | G | G | G | G | G | G |
| SJ16 | R | R | G | G | G | G | G | G | G | G | G |
| NE21 | G | G | G | G | G | G | G | G | G | A | R |
| NE22 | G | G | G | G | G | R | G | G | A | G | R |
| NE18 | R | G | G | G | G | G | G | G | G | G | G |
| ST11 | G | G | G | R | G | A | G | G | A | A | G |
| EC02B | G | G | G | G | R | G | G | G | G | G | G |
| NE19B | R | G | G | G | G | G | G | G | R | G | R |
| ST01 | G | G | G | R | R | G | G | G | A | A | R |

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| HELAA Ref | Strategic & local employment areas (distance) | Loss of Designated Employment Site | District and Local Centre (m) | Distance to Nearest Bus Stop (m) | Distance to Nearest Train Station (m) | Distance to Nearest Primary School (m) | Distance to Nearest Secondary School (m) | Distance to Nearest Doctor/ Health Centre (m) | Distance to Nearest Open Space | Loss of Open Space | Development in Area of Relative Deprivation |
|-----------|---|------------------------------------|-------------------------------|----------------------------------|---------------------------------------|--|--|---|--------------------------------|--------------------|---|
| CS01 | G | G | G | G | G | G | G | G | G | G | G |
| COP01 | G | G | G | G | G | G | G | G | G | G | G |
| CS02 | G | G | G | G | G | G | G | G | G | G | G |
| NE06 | G | G | G | G | G | R | G | G | G | A | R |
| FR02 | G | G | G | G | G | A | G | G | G | G | R |
| DF02 | R | R | G | G | G | G | G | G | G | G | G |
| HI05 | R | G | G | G | R | G | G | G | G | G | R |
| ST03 | G | G | G | A | R | G | G | G | G | G | G |
| ST04 | G | G | G | A | G | G | G | A | G | G | R |
| DF03 | A | G | G | G | R | G | G | G | G | G | G |
| EC04 | G | G | G | R | R | G | G | R | R | G | G |
| CD01 | G | G | G | R | G | G | A | G | R | A | R |
| CD02 | G | G | G | G | G | G | G | G | G | G | G |

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Sustainability Appraisal (SA) for the Portsmouth Local Plan

**SA Report Non-Technical Summary (NTS)
to accompany Regulation 19 consultation**

Portsmouth City Council

March 2024

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Quality information

| Prepared by | Checked by | Verified by | Approved by |
|-------------------------------------|------------------------|-------------------------|-------------------------|
| CB: Principal Environmental Planner | IM: Associate Director | NCB: Technical Director | NCB: Technical Director |

Revision History

| Revision | Revision date | Details | Name | Position |
|-----------------|----------------------|---------------------------------|-------------|--|
| V1 | January 2024 | Draft for client review | GB | Principal Planning Policy Officer, PCC |
| V2 | February 2024 | Updated draft for client review | GB | Principal Planning Policy Officer, PCC |
| V3 | March 2024 | Final for consultation | GB | Principal Planning Policy Officer, PCC |

Prepared for:

Portsmouth City Council

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1. Introduction

Introduction to SA

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Portsmouth Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement and is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.

Structure of the SA Report/ this NTS

In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.¹ The report must then be considered, alongside consultation responses, when finalising the plan.

More specifically, the SA Report should answer the following three questions²:

1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this stage?
 - i.e., in relation to the draft plan.
3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan.

The SA Report is structured in parts that each seek to address these three questions. This is a Non-Technical Summary (NTS) of the SA Report, and it is similarly structured with chapters dedicated to each question.

The SA Report and NTS accompanies the draft Portsmouth Local Plan for Regulation 19 consultation.

The SA Report (and NTS) builds upon initial work undertaken in the Interim SA Report which accompanied the draft plan in consultation in 2021.

What is the Local Plan seeking to achieve?

The Portsmouth Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision³ which was adopted in 2021:

“In 2040 Portsmouth will be an island city with an incredible waterfront, a rich cultural heritage, and a strong maritime history. With a naval base, international port, and strong links across the south, we are the centre of culture and enterprise for our

¹ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

² See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

³ [Imagine Portsmouth 2040 Vision](#)

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area. In 2040 we are very proud of Portsmouth, how we behave towards each other and how it feels to live here.”

Six strategic objectives have been developed from this high-level vision that can be summarised as: a healthy and happy city, a city rich in culture and creativity, a city with a thriving economy, a city of lifelong learning, a green city, and a city with easy travel.

What is the scope of the SA?

The scope of the SA was established in 2017 and has been continuously updated since (including in Appendix C of the SA Report). The scope is summarised by a series of ten SA objectives that form the structure for the assessment. Each option and proposal in the plan identified for SA has been assessed against each of these SA objectives. The main report (Chapter 3) includes the SA framework which provides assessment criteria and potential indicators to assist the assessment. The series of SA objectives are:

- **SA-1:** Building a strong, competitive economy in Portsmouth
- **SA-2:** Ensuring the vitality of the city centre and other town centres in Portsmouth
- **SA-3:** Promoting sustainable transport in Portsmouth
- **SA-4:** To tackle climate change, flooding and coastal change in Portsmouth
- **SA-5:** Delivering high quality homes in Portsmouth
- **SA-6:** To promote healthy communities
- **SA-7:** Conserving and enhancing the historic townscape
- **SA-8:** Requiring good urban design in Portsmouth
- **SA-9:** Conserving and enhancing the natural environment in Portsmouth
- **SA-10:** Facilitating the sustainable use of natural resources in Portsmouth

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2. Plan-making/ SA up to this point

Introduction

In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then considered the appraisal findings when finalising the Local Plan. Part 1 of the SA Report is given over to:

1. Presenting the reasons for selecting the alternatives dealt with (summarised under the heading 'establishing reasonable alternatives' below).
2. Presenting a summary of the appraisal of the alternatives (summarised under the 'appraising reasonable alternatives' heading below); and
3. Explaining the Council's reasons for selecting the preferred approach (summarised under the 'developing the preferred approach' heading below)

Importantly, this work builds upon existing SA work undertaken at the Issues and Options stage (2017) and the Regulation 18 'draft plan' stage reported in the Interim SA Report (2021). Alternatives at this stage do not repeat any alternatives work already undertaken to date, alternatives are explored considering feedback from consultation to date and the updated draft plan being presented for Regulation 19 consultation.

Establishing reasonable alternatives

The SA Report (Chapter 5) explores in detail the evidence around the housing and employment growth needs in the city and potential locations to accommodate these needs. Particular attention is paid to feedback from consultation and changes that have been made in the latest iteration of the plan.

Alternatives for housing growth

Continued evidence development highlights that Portsmouth is unable to meet housing needs in full based upon the Government's Standard Methodology calculation. Informed by the Housing and Economic Development Needs Assessment (HEDNA), the following housing needs and supply forecast is presented:

| Source | No. of homes | |
|-----------------------------|---|-------|
| Strategic development sites | Portsmouth City Centre | 4,158 |
| | Tipner West & Horsea Island | 814 |
| | Tipner East | 1,056 |
| | St James' Hospital and Langstone Campus | 417 |
| | Fratton Park and the Pompey Centre | 710 |
| Strategic allocations | Port Solent | 500 |
| | St John's College | 212 |
| | Fraser Range | 134 |
| | The News Centre, Hilsea | 100 |

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| Source | | No. of homes |
|---|---|---------------------|
| | Somers Orchard, Somerstown | 565 |
| HELAA sites | Small/ medium sites <1ha with capacity for 5 or more homes. | 1,543 |
| | Sites >1ha with capacity for 5 or more homes. | 457 |
| | 'Non-Implementation 'Discount' (15%) | -300 |
| Net completions | Sites of 5 or more dwellings 2020-23 | 305 |
| Permissions outstanding | As of 31 st March 2023 | 1,353 |
| | 'Non-Implementation 'Discount' (15%) | -203 |
| Windfall estimate | Small sites <5 homes | 1,007 |
| Equivalent contributions | HMOs | 731 |
| | C2 accommodation completions | 44 |
| Total supply | | 13,603 |
| Housing needs | Standard Methodology | 17,980 |
| | HEDNA trend-based population projections | 13,100 |
| | HEDNA jobs growth lower-end estimations | 8,620 |
| Need/ supply balance | Standard Methodology | -4,377 |
| | HEDNA trend-based population projections | +503 |
| | HEDNA jobs growth lower-end estimations | +4,983 |
| Potential contributions from outside the city (DtC) | Fareham | 800 |
| Need/ supply balance including DtC | Standard Methodology | -3,577 |
| | HEDNA trend-based population projections | +1,303 |
| | HEDNA jobs growth lower-end estimations | +5,783 |

Whilst a range of housing options have been explored through the SA to date, alternatives at this stage have sought to assist the Council in developing sequential testing (for development encroaching on flood zones) and in thoroughly testing wider options housing growth that exclude additional housing development at the Tipner West and Horsea Island East strategic site (located within a flood risk zone).

The following alternatives for housing growth are presented at this stage for SA:

- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
- **Option H2:** Maximise housing delivery⁴ (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
- **Option H3:** Develop some areas within FRZ2/ 3⁵ reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply

⁴ See Para 5.56

⁵ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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and meet the lower end estimates for housing needs, but is still unlikely to meet the housing need in full using the standard methodology)

- **Option H4:** Maximise housing delivery⁶ (where possible) on sites, including sites within FRZ2/ 3⁷ (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology)

Avoiding development in Flood Risk Zones 2 and/ or 3 will mean avoiding development at some key sites (sites where >50% of the land intersects Flood Risk Zones 2 and/ or 3), these include:

- Strategic Sites: Tipner West & Horsea Island East and Tipner East (no additional development above that committed).
- Site Allocations: Port Solent, and The News Centre, Hilsea
- Small and medium housing sites: NE02 (Smeaton Street Garages), PA03 (140 Southampton Road), EC07 (4 Waverley Road), DF06 (East Lodge Farm), HI04 (land at Pompey Health and Fitness Club), ST17 (Clarence Pier), EC01 (Fraser Range), EC14 (Eastney Swimming Pool), SJ12 (84-88 Clarendon Road), SJ16 (Wimbledon Park Sports Park Centre)

When maximising delivery at sites, the Council have determined that the following sites are suitable to be tested to deliver higher housing numbers:

- Somers Orchard, Somerstown – this site is in FRZ1. As a Council owned estate, a higher density scheme delivering 700 homes in total is being tested (delivering an additional 134 homes than the currently estimated 566 dwellings). Applicable to Options H2 and H4.
- The News Centre, Hilsea – a housing only scheme (i.e., no delivery of a new bus depot) is being tested as an alternative which could deliver 200 homes in total (100 additional homes to the currently estimated 100 dwellings). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- City Centre – further intensification and regeneration at the city centre could boost housing supply to potentially around 5,000 new homes (an additional 842 homes to that currently estimated) though this is notably likely to impact strategic employment growth targets. Applicable to Options H2 and H4 as FRZ1.
- Port Solent – further intensification and regeneration at Port Solent could increase the number of homes delivered at this site to around 600-700 homes (100-200 additional homes to that currently estimated). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- St James' & Langstone Campus – a small part of this site lies within FRZ2/ 3. An option for increased development at this part of the site could deliver around 200 homes (an additional 80 homes to that currently identified). Applicable to Options H2 and H4 with development focused within FRZ1.
- Tipner West and Horsea Island East – maximising delivery on this site could see a total of 1,250 new homes. This is at the top end of the range of new homes for which the site is allocated. This is only applicable to Option H4, though it is recognised that this could emerge under H3 as well.

⁶ See Para 5.56

⁷ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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Alternatives for employment growth

With the HEDNA identifying employment growth levels somewhat lower than the sub-regional PfSH work has estimated, it is considered appropriate at this stage to investigate the key sites underpinning the employment growth strategy and options for employment growth levels. These are notably constrained by a lack of suitable sites and competing housing needs.

The following alternatives are identified for SA, split into options for both office space and industrial/ warehousing space:

Office Space:

- **Option OF1:** An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
- **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park. (PfSH estimate of need)

Industrial/ warehousing space:

- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need)
- **Option IF5:** An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (HEDNA top-end estimate of need)
- **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PfSH estimate of need)

Policy alternatives

In the context of discussions around future growth, there are notably a few policy areas that stand out with the potential to affect the overall growth strategy and thus warrant further attention as part of alternatives assessment. These key policy focus areas have been developed in collaboration with PCC and cover Houses of Multiple Occupation, First Homes, and Biodiversity Net Gain.

Houses of Multiple occupation (HMOs)

HMOs meet the needs of those that require a more affordable housing option (including around 42% of students) and the Council includes HMOs in its land supply data given the large amount being permitted and delivered over recent years and the role they play in helping to meet the city's housing need. Most notably the HMO supply in Portsmouth is falling and affordability is worsening, and the supply of HMOs can reduce the availability of family-sized homes in the city. Given these implications for housing supply, the Council have identified a range of options for HMO policy directions. Policy directions may seek to place a percentage limit on

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HMOs within any given area, and there are options for the percentage level and radii distance that extends any application site. The options are summarised as follows:

- **Option HMO1:** No additional HMO development (0%) city-wide
- **Option HMO2:** 5% limit within 50m radius of application site
- **Option HMO3:** 5% limit within 100m radius of application site
- **Option HMO4:** 10% limit within 50m radius of application site
- **Option HMO5:** 10% limit within 100m radius of application site
- **Option HMO6:** 15% limit within 50m radius of application site

First Homes

The First Homes scheme is targeted specifically at first-time buyers and can offer a home at between 30 – 50% cheaper than its market value. These homes are either new builds (built by a developer), or purchases of an existing 'First Home' under the scheme. The scheme seeks to provide for affordable home ownership needs (separate to affordable renting needs) and has eligibility criteria which includes a maximum total annual household income of £80,000 in Portsmouth. Council's may also set further eligibility conditions which can for example, prioritise essential workers, people who live in the area, and those on lower incomes.

The Council is currently exploring the percentage of affordable housing that should be given over to the First Homes scheme, recognising that the scheme represents one element of affordable housing, targeted at a particular group (first-time buyers). It is important to note that all options form a percentage of the affordable housing element of a development proposal they do not affect the overall level of affordable housing contributions (just the sub-type).

Three options have been identified in relation to First Homes:

- **Option FH1:** 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH2:** 10% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH3:** 25% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.

Biodiversity Net Gain

Biodiversity net gain (BNG) is an important principle for development which has emerged over recent years as a means of creating and improving natural habitats and reversing biodiversity decline trends. BNG makes sure development has a measurably positive impact on biodiversity, compared to what was there before development.

BNG has become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) which requires developers to deliver a BNG of 10%. The Local Plan policies can ultimately seek to align with the emerging planning law or look to exceed the requirement (it is not considered reasonable to seek lower percentages given the emerging law).

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On this basis, two options have been identified in relation to BNG:

- **Option BNG1:** require 10% net gain in all developments.
- **Option BNG2:** require 20% net gain in all developments.

An assumption is made in that both options will prioritise on-site delivery wherever possible.

Alternatives for assessment

A total of six sets of options (relating to housing, employment, and HMOs, First Homes, and BNG policies) are taken forward for assessment.

Appraising reasonable alternatives

Presented below are the summary appraisal findings for the established housing growth options, employment growth options, and policy options. Two sets of employment growth options and options under three different policy themes follow the housing growth options. The detailed narrative explaining these findings is presented in Chapter 6 of the SA Report.

Methodology

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in text. Where appropriate neutral effects, or uncertainty will also be noted. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference (separate to the summary of likely significant effects). This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the site option or options that are preferred from an SA perspective with '1' being the highest ranking. '=' has been used to highlight where options perform equally and cannot be differentiated between.

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Alternatives for housing growth

| SA objective | | Option H1: Develop in low flood risk areas only | Option H2: Maximise housing delivery in low flood risk areas | Option H3: Some development within FRZ2/ 3 (current strategy) | Option H4: Maximise housing delivery including in FRZ2/ 3 |
|--|---------------------|--|---|--|--|
| 1 (Economy) | Significant effect? | No | Uncertain | Yes - positive | Yes - positive |
| | Rank | 3 | 4 | 1 | 2 |
| 2 (Town centres) | Significant effect? | No | No | Yes - positive | Yes- positive |
| | Rank | 4 | 3 | 2 | 1 |
| 3 (Sustainable transport) | Significant effect? | No | No | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 4 (Climate change, flooding, and coastal change) | Significant effect? | No | No | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 5 (Housing) | Significant effect? | Yes - positive | Yes - positive | Yes - positive | Yes - positive |
| | Rank | 4 | 3 | 2 | 1 |
| 6 (Healthy communities) | Significant effect? | Yes - positive | Yes - positive | Yes - positive | Yes - positive |
| | Rank | 2 | 2 | 1 | 1 |
| 7 (Historic environment) | Significant effect? | Uncertain | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 | 4 |
| 8 (Urban design) | Significant effect? | No | No | No | No |
| | Rank | 2 | 3 | 1 | 4 |
| 9 (Natural environment) | Significant effect? | Yes - negative | Yes - negative | Yes - negative | Yes - negative |
| | Rank | 1 | 2 | 3 | 4 |
| 10 (Natural resources) | Significant effect? | No | No | No | No |
| | Rank | 1 | 2 | 3 | 4 |

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Alternatives for employment growth (office space)

| SA objective | | Option OF1: 42,500sqm at Lakeside Business Park | Option OF2: 61,700sqm at Lakeside Business Park and the City Centre | Option OF3: 74,217sqm at Lakeside Business Park and the City Centre |
|--|---------------------|--|--|--|
| 1 (economy) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 3 | 2 | 1 |
| 2 (town centres) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 1 |
| 3 (sustainable transport) | Significant effect? | No | No | No |
| | Rank | 2 | 1 | 1 |
| 4 (climate change, flooding, and coastal change) | Significant effect? | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 |
| 5 (housing) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | = | = | = |
| 6 (healthy communities) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | = | = | = |
| 7 (historic environment) | Significant effect? | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 |
| 8 (urban design) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 9 (natural environment) | Significant effect? | Uncertain | Uncertain | Uncertain |
| | Rank | 1 | 2 | 3 |
| 10 (natural resources) | Significant effect? | No | No | No |
| | Rank | = | = | = |

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Alternatives for employment growth (industrial/ warehousing space)

| SA objective | | Option IF4: net loss (-42,800sqm) | Option IF5: additional 96,300sqm | Option IF6: additional 210,214sqm |
|--|---------------------|-----------------------------------|----------------------------------|-----------------------------------|
| 1 (economy) | Significant effect? | Yes – negative | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 2 |
| 2 (town centres) | Significant effect? | Yes – negative | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 2 |
| 3 (sustainable transport) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 4 (climate change, flooding, and coastal change) | Significant effect? | Uncertain | No | Uncertain |
| | Rank | 2 | 1 | 3 |
| 5 (housing) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 3 | 1 | 2 |
| 6 (healthy communities) | Significant effect? | Yes – positive | Yes – positive | Yes – positive |
| | Rank | 2 | 1 | 3 |
| 7 (historic environment) | Significant effect? | Uncertain | No | Uncertain |
| | Rank | 2 | 1 | 3 |
| 8 (urban design) | Significant effect? | No | No | No |
| | Rank | 2 | 1 | 3 |
| 9 (natural environment) | Significant effect? | Uncertain | No | Uncertain |
| | Rank | 2 | 1 | 3 |
| 10 (natural resources) | Significant effect? | No | No | No |
| | Rank | = | = | = |

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Alternative policy approaches (HMOs)

| SA objective | | Option HMO1 | Option HMO2 | Option HMO3 | Option HMO4 | Option HMO5 | Option HMO6 |
|--|---------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| 1 (economy) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 3 | 3 | 3 | 2 | 1 |
| 2 (town centres) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 3 | 3 | 3 | 2 | 1 |
| 3 (sustainable transport) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 4 (climate change, flooding, and coastal change) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 5 (housing) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 2 | 2 | 1 | 1 | 3 |
| 6 (healthy communities) | Significant effect? | No | No | No | No | No | No |
| | Rank | 3 | 1 | 1 | 2 | 2 | 3 |
| 7 (historic environment) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 8 (urban design) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 9 (natural environment) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |
| 10 (natural resources) | Significant effect? | No | No | No | No | No | No |
| | Rank | = | = | = | = | = | = |

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Alternative policy approaches (First Homes)

| SA objective | | Option FH1: 0% | Option FH2: 10% | Option FH3: 25% |
|---|----------------------------|-----------------------|------------------------|------------------------|
| 1 (economy) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 2 (town centres) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 3 (sustainable transport) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 4 (climate change, flooding, and coastal change) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 5 (housing) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 6 (healthy communities) | Significant effect? | No | No | No |
| | Rank | 1 | 2 | 3 |
| 7 (historic environment) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 8 (urban design) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 9 (natural environment) | Significant effect? | No | No | No |
| | Rank | = | = | = |
| 10 (natural resources) | Significant effect? | No | No | No |
| | Rank | = | = | = |

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Alternative policy approaches (BNG)

| SA objective | | Option BNG1: 10% | Option BNG2: 20% |
|---|----------------------------|-------------------------|-------------------------|
| 1 (economy) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 2 (town centres) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 3 (sustainable transport) | Significant effect? | No | No |
| | Rank | = | = |
| 4 (climate change, flooding, and coastal change) | Significant effect? | Yes - positive | Yes - positive |
| | Rank | 2 | 1 |
| 5 (housing) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 6 (healthy communities) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 7 (historic environment) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 8 (urban design) | Significant effect? | No | No |
| | Rank | 2 | 1 |
| 9 (natural environment) | Significant effect? | Yes - positive | Yes - positive |
| | Rank | 2 | 1 |
| 10 (natural resources) | Significant effect? | No | No |
| | Rank | 2 | 1 |

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Developing the preferred approach

This section explains the Council's preferred approach, considering the appraisal of reasonable alternatives in Section 6, and bringing it together with available evidence and Council and wider priorities.

Housing growth options

The Council's **preferred option is Option H3: Develop additional areas within FRZ2/ 3 reflective of the current plan strategy (NB, this option is expected to boost contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet housing needs in full using the standard methodology).**

Option H3 is the preferred approach and is fully evidenced by the comprehensive assessment undertaken in HELAA, which identifies all deliverable and developable sites that could accommodate five or more new homes. Option H3 generates a housing target of 680 net additional homes per year and meets as much of the City's objectively assessed housing need, as set out in the HEDNA (2023) as possible, in line with current national policy. It takes forward all HELAA sites, in flood zones 1, 2 and 3, as either strategic sites, site allocations or identified housing sites in Appendices 2 and 3 of the draft Local Plan. The HELAA provides robust evidence to show that there are no other suitable, available or achievable sites that could be taken forward.

If housing supply relied on sites solely within flood zone 1, Portsmouth would have a more significant deficit of homes delivered over the plan period when assessed against the housing need (using the standard methodology). The inclusion of sites within all three flood risk areas still falls short of meeting Portsmouth's housing need, signifying the importance of their inclusion. There are no sites that have been omitted based on flood risk, and therefore careful consideration is given to management and mitigation of flood risk for the lifetime of development. Detail on how development of these sites will remain safe is provided within planning policy, both in terms of the general approach to flooding in Strategic Policy PLP21: Flooding and with regard to suitable site specific requirements for Strategic Sites and Site Allocations. Further detail can be found within the sequential and exception test contained within the SFRA.

The Council has an agreed Statement of Common Ground with the Environment Agency. This provides details on the agreed approach towards allocating sites within areas risk of flooding, as set out within the sequential and exception test. It also sets out the agreement towards the Council's approach on flood risk when determining development proposals.

This option takes account of a range of other relevant constraints, including nature conservation and transport, where careful consideration is given to impacts and risks, and how they can be mitigated and managed, which informs policy requirements.

This option applies residential yields of the strategic sites and site allocations, and residential density ranges for all other sites in line with the policy approach set in the draft Local Plan (PLP21: Residential Density). It seeks to optimise the use of land as far as possible, taking account of the varying development potential within the City's diverse but confined area, in terms of local character and existing densities, public

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transport and access to a range of services and with regard to development viability and deliverability. This is supported by evidence contained within the Urban Characterisation Study, the Housing Density Background Paper (2021) and the Viability Study (2024).

Section 5 of this report details potential growth locations in the City and, alongside a number of other strategic sites, Tipner West and Horsea Island East is key to the draft Local Plan's development strategy. It seeks delivery of a marine employment hub alongside a new bridge and flood management measures. The housing element of the site, expected to deliver 814 to 1,250 new homes is enabling development, to achieve viability of marine employment hub while also making an important contribution to meeting housing needs in the City.

The draft Regulation 19 Local Plan gives consideration to responses to the Regulation 18 consultation, which presented three options for Tipner West and Horsea Island East: for an Innovative Sustainable Community, or super-peninsula, including 3,500 - 4,000 new homes and significant land reclamation; regeneration of the existing area; and to maintain the area in its current state ('do nothing'). The option for the super-peninsula received a high level of opposition and would have involved the reclamation of a considerable amount of land from Portsmouth Harbour, which is protected by multiple layers of nature conservation designations. The decision was made by Full Council in 2022 to abandon that scheme along with the do-nothing scenario for the site. The draft Regulation 19 allocation envisages a much reduced form of development and only allows a small amount of reclamation for the marine employment hub if it can be shown to be necessary for project viability or feasibility.

This option is assessed through the Habitats Regulations Assessment (HRA) supporting the Pre-Submission Local Plan. The objective of the HRA is to identify any aspects of the Local Plan that would cause Likely Significant Effects on, or adverse effects on the integrity of, internationally and nationally designated nature conservation sites. The HRA concluded that the Tipner West & Horsea Island East allocation will have adverse effects on the Portsmouth Harbour SPA / Ramsar site, because it will inevitably result in the loss of 0.2ha of inter-tidal protected habitats and (depending on the layout and quantum of development in any future planning application, and depending on evidence of viability and feasibility) may result in the loss of up to 0.5ha intertidal, 0.5ha subtidal, and 3.6ha terrestrial protected habitats. As a result, the policy can only be adopted if certain statutory derogation tests are met. Those tests require there to be: i) no feasible alternative solutions to the allocation; ii) imperative reasons of overriding public interest (IROPI) for the allocation to proceed; and iii) sufficient compensatory habitats available to ensure that there is no residual impact on the integrity on the Habitats sites. The HRA concluded that each of those tests was met. The preferred option provides the flood defences, land decontamination and new marine hub and seeks to minimise harm to the nature conservation designations.

The City Council have worked effectively and continuously with surrounding local authorities in the PfSH area with the intention of meeting unmet housing need under the Duty to Cooperate. The Fareham Local Plan, adopted in 2023 (for a plan period to 2037) identifies 800 new homes to address unmet housing need in Portsmouth. The Council has formally requested a contribution to meet this unmet need from remaining PfSH neighbours, and will continue to engage on this matter. It will set out

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the detail of this cooperation in a series of Statement of Common Grounds with each local authority.

Option H3 has positive significant effects in relation to six out of ten Sustainability Appraisal objectives, as detailed in section 6. This includes for housing and healthy communities, economy, town centres and sustainable transport. While there are no significant effects relating to Objective 8. Urban Design, the high ranking of this option links to minor positive effects with regard to delivering good urban design, adequate housing standards and enhancements to local character. Two negative significant effects relate to historic environment and natural environment, but it is considered that these can be adequately mitigated for and managed through the draft Local Plan's policies.

Taking account of the above consideration of how this approach meets sustainability objectives and the findings of the comprehensive evidence base, Option H3 is the most sustainable approach compared to the reasonable alternatives.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:

Option H1: Develop all deliverable and suitable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will fall significantly short of meeting housing needs).

Option H2: Maximise housing delivery (where possible) on all deliverable and suitable HELAA Sites within FRZ1 (NB, this option is still considered to fall significantly short of meeting housing needs).

Options H1 and H2 are not taken forward as they are expected to fall significantly short of meeting housing need. They also have notably fewer (two out of ten, as opposed to the preferred option's six out of ten) positive significant effects on sustainability objectives. They result in the same number of negative significant effects as the preferred approach. These two options also do not account for the potential role that mitigation and management of risks and impacts that the Council's evidence base provides, which can enable development, as detailed under the preferred approach.

Option H2 would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021) and could lead to an intensity of development on sites within Flood Zone 1 that could bring potential negative impacts to local character, housing standards, and a higher level of demand on local services (e.g. healthcare and schools) and amenities. This would not be considered to fit with the plan's six strategic objectives.

Accounting for the above, these two options are less sustainable when considered against the preferred approach and other reasonable alternatives (Option H4, detailed below) and are not taken forward.

Option H4: Maximise housing delivery (where possible) on sites, including sites within FRZ2/ 3 (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet housing needs in full using the standard methodology)

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The majority of the factors considered in Option H3, the preferred approach, also apply to this option, but this one has the potential to deliver a higher number of new homes than that generated by the preferred approach. A number of sites, as outlined in section 5 of this report, would see an uplift in density and housing numbers. It is considered that this would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021). It could lead to an intensity of Development coming forward in locations across the city that leads to potential adverse impacts on local character, housing standards, historic environment and a higher level of demand on local services (e.g. healthcare and schools) and amenities than the preferred approach. This would have potential to undermine the plan's six strategic objectives.

The balance of positively and negative effects on sustainability objectives is very similar to the preferred approach, but based on the consideration of the above evidence, Option H4 is considered a less favourable option when compared against the preferred approach.

Employment Growth Options

Office development

The Council's **preferred approach is Option OF1: An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)**

This follows evidence from the Council's HEDNA, which analyses demand for new office floorspace against different labour demand scenarios. Taking account of the shift to home and hybrid working following the Covid-19 pandemic, reduced levels of employment growth, replacement demand for office development and the trend towards 'flight to quality' where business occupiers and investors seek high-quality modern office space, the HEDNA's preferred alternative labour demand scenario leads to a recommendation for a requirement of around 42,500 sqm of office space. This will be largely delivered through Lakeside Strategic site, alongside smaller net gains through redevelopment of floorspace in the City Centre.

Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities. Employment growth and office occupancy is expected to support increased footfall and expenditure in City's town centres, development opportunities for housing (and jobs for new residents) and increased employment levels leading to better quality of life and health outcomes. However it should be noted that these significant benefits are also evident for the two reasonable alternatives for office development, as listed below.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:

Option OF2: An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)

Option OF3: An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park (PfSH estimate of need)

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Based on the HEDNA, these two options are not considered to be appropriate as a basis for establishing need for office floorspace.

The HEDNA states that at present there is little demand for office floorspace as shown by the net absorption rate and through discussions with local agents, although these do point to the need for smaller spaces in the City Centre over time, but less certainty regarding larger corporate space. Furthermore, it is important to note that overall, typically office based sectors, such as banking and accountancy, have lower representation in the City in comparison to advanced manufacturing.

Industrial/ warehousing development

The Council's preferred approach is **Option IF5: An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites (HEDNA top-end estimate of need).**

This option is based on the recommendation of HEDNA's preferred alternative labour demand scenario, which shows 96,300 sq.m should be used for estimating future requirements of manufacturing and warehousing. This preferred option is considered appropriate in light of any need to test economic-led housing need.

This will be delivered at strategic sites, site allocations and through completion of extant permissions. There is also opportunity for intensification and making better use of land in existing industrial areas. The Council's HELAA and the Approach to Employment Land Study by BE Group also highlight intensification opportunities on existing industrial/ warehousing sites for further development, which may come forward during the plan period as windfall development.

Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:

Option IF4: A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need).

Option IF6: An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PfSH estimate of need)

The HEDNA states that overall the labour demand (alternative) and net completions ranges are considered to be more appropriate whilst still planning positively for growth. These show a range from around 75,500 sq.m to 96,300 sq.m) and the preferred option is at the upper end of this range.

It is clear that a net loss of industrial/warehousing premises in the City would not have a positive effect on the economy of the City. Manufacturing including the

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maritime and engineering employment sectors related to naval activity and research would not benefit from a net reduction in floorspace.

Equally the provision of a quantum of floorspace that is substantially above need could flood the market and thus not deliver tangible benefits to the economy of the City.

Houses in Multiple Occupation (HMOs)

The Council's preferred option is **Option HMO4: 10% limit within the 50m radius of the application site.**

The Council has for several years sought a balanced approach to the management of HMOs in an effort to create mixed and balanced communities and to ensure that HMOs, with associated social, environmental and amenity impacts, are not heavily concentrated in a given area. The Council's 2019 Supplementary Planning Document on HMOs identifies that "a community will be considered imbalanced where more than 10% of residential properties within a 50m radius of the area surrounding the application property are already in HMO use". This seeks to ensure a mix of housing types and sizes, to meet a range of local housing needs. This threshold has been used successfully in Portsmouth for over five years and is also used by two thirds of local authorities across the country that control HMO proliferation.

It is also important to recognise the role that HMOs play in meeting an element of affordable housing supply, as highlighted in the Council's HEDNA. The preferred approach (Option HMO4) is considered to allow this tenure of housing reasonable scope to meet that need while maintaining balanced communities.

Option HMO6 and to a lesser extent HMO5, while having greater potential to meet an element of need for affordable housing and bring potential for minor positive benefits for economy and town centres sustainability objectives, could lead to a minor negative effects, as highlighted in section 6. These communities would be considered imbalanced, with greater potential for negative social, environmental and amenity impacts on local communities, which would be focused in areas that already have high concentrations of HMOs (Southsea, St Thomas and St Jude). This policy option is not considered an appropriate way forward when considered against the appraised alternatives and is not taken forward the in draft Local Plan.

The assessment in section 6 also shows that applying HMO1 at 0% (no additional HMO development) or a more stringent cap (HMO2 and HMO3 at a 5% limit with 50m or 100m radius of the application site) could lead to minor negative effects by restricting opportunities to meet additional need for HMOs over the plan period. It should be noted that application of such a policy would not be expected to prevent demand for HMOs, even with policy compliant delivery of affordable housing (due to the level of need for affordable housing set out in HEDNA) and would simply shift demand for this development elsewhere. A lower limit option (HMO1, HMO2 and HMO3) could essentially cap new HMO development in areas where they are already concentrated (above the 5% limit) and would be likely to lead to a dispersal of HMO development to nearby areas, where concentrations are currently lower. This could lead to (minor) negative effects arising more widely across the City, with any benefits being seen in areas with already high concentrations of HMOs, where any further concentration would be halted.

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For this reason, HMO1, HMO2 and HMO3 are not considered a suitable way forward when considered against the alternatives, and are not taken forward in the draft Local Plan.

First Homes

The Council's preferred approach is **Option FH1: 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.**

This is because there is no evidenced requirement for First Homes in Portsmouth, as part of delivery of affordable housing. Shared ownership is an important and proven route to affordable home ownership due to the lower deposit needed to secure a property compared to First Homes. The Council's HEDNA shows only a small gap in the incomes needed to buy or rent a home in the City, and therefore very little need for First Homes.

Shared ownership is considered to offer a genuinely affordable alternative to market homes which carries greater benefits to people in Portsmouth.

Evidence in the HEDNA and Local Plan Viability Study show there are viability issues in delivering either the Government's recommended threshold of 25% (Option FH3), or a lower level of 10% (Option FH2) of affordable homes as first homes. This carries the risk of detrimentally impacting the delivery of other affordable tenures that the Council deem as priorities, specifically affordable and/or social rent and Shared Ownership. It could leave the Council at risk of having reduced numbers or no affordable homes provided through development, for viability reasons. For this reason, Option FH2 and Option FH3 are not taken forward in the draft Local Plan.

In terms of appraisal against sustainability objectives, all options were neutral (had no significant) effects. The options form a percentage of the affordable housing requirement from development, and development location remains the same. The sustainability objectives most likely to be affected by the different options are housing, healthy communities and the economy, where the preferred approach (Option FH1) has minor positive effects, and lead to it being ranked first under these three objectives. For the reasons outlined above, Option FH1 with its target of 0% First Homes as part of affordable housing provision is considered best suited to meet local housing needs in the City, while ensuring that the draft Plan's wider approach to affordable housing delivery is viable and deliverable.

Biodiversity Net Gain (BNG)

The Council's preferred approach requires 10% BNG on all developments, with the exception of three predominantly Council owned sites (Portsmouth City Centre North, Somers Orchard and Lakeside) where 20% is required. This is considered to strike a balance between meeting the national BNG requirement (10%) while supporting the Council's aspiration to exceed the minimum requirement on key Council owned sites. It offers a pragmatic solution which will help deliver measurable improvements to biodiversity while remaining achievable and viable.

The City Council is also pursuing the delivery of offsite BNG on City Council owned land in order to maximise the benefits of BNG delivery in the City.

Both options below achieve positive significant effects for sustainability objectives on climate change, flooding and coastal change, and natural environment. While minor

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positive effects support higher ranking for Option BNG2, adverse impacts on viability (noted below under Option BNG2) and therefore the deliverability of planned development mean that a 10% net gain on all development, with the exception of the three predominantly Council owned sites named above, is considered the appropriate as the preferred approach.

As discussed the preferred approach falls between the two alternative options, which are appraised separately below.

Option BNG1: require 10% net gain in all developments.

The City Council considered this approach as it would be in line with the approach set to become the national requirement from 2024 (schedule 14 of the Environment Act 2021). In March 2023 the elected members of Portsmouth City Council indicated that the Council should look to exceed this minimum requirement on City Council owned land. Taking this target was felt to be insufficiently ambitious and did not show the leadership on BNG and the environment that members considered the Council should be taking with its own landholdings.

Option BNG2: require 20% net gain in all developments.

The City Council considered this approach in order to look at options be more ambitious in regard to BNG and the environment. The Local Plan Viability Study (2024) tested development viability of different levels of BNG in the city and found that at 20% BNG, viability of some schemes may decrease. This option is therefore not being pursued at this time. The City Council recognises that BNG is just one of a suite of tools available to it to deliver environmental benefits in the City. The emerging local Plan PLP38) is also requiring development to meet the five standards set out in the Natural England Green Infrastructure Framework The Urban Nature Recovery Standard comprising; The Urban Nature Recovery Standard; Urban Greening Factor; Urban Tree Canopy Cover Standard; Accessible Greenspace Standards and the Green Infrastructure Strategy.

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3. SA findings at this stage

Introduction

Part 2 of the SA Report presents an appraisal of the draft plan, as to be published under Regulation 19 of the Planning Regulations. A series of narratives are presented under each of the ten SA objectives, providing a commentary on the spatial strategy, city-wide policy provisions, cumulative effects, and overall conclusions (relevant to each SA theme – i.e., there is no systematic consideration of each individual policy, instead policies are drawn upon as relevant to the SA objective in question).

Methodology

The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the ten SA objectives identified through scoping as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Local Plan in more general terms.

Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations.⁸ So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

⁸ Environmental Assessment of Plans and Programmes Regulations 2004

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Summary appraisal findings

Overall, the following conclusions are reached for each of the SA objectives:

| SA objective | Plan appraisal conclusion |
|---|--|
| SA-1: Building a strong, competitive economy in Portsmouth | The spatial strategy and policy provisions of the draft plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall significant positive effects are considered likely as a result. |
| SA-2: Ensuring the vitality of the City Centre and other town centres in Portsmouth | The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, significant positive effects are anticipated overall. |
| SA-3: Promoting sustainable transport in Portsmouth | Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, long-term minor positive effects are considered likely overall. |
| SA-4: To tackle climate change, flooding, and coastal change in Portsmouth | The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, minor negative effects are concluded. |
| SA-5: Delivering high-quality homes in Portsmouth | Overall, significant positive effects are concluded in relation to this objective, recognising that the Plan has put forward a viable housing strategy at this stage, though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for. |
| SA-6: Promoting healthy communities | On balance, it is appropriate to conclude that the draft plan could lead to significant long-term positive |

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SA objective**Plan appraisal conclusion**

| | <p>effects in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.</p> |
|---|--|
| <p>SA-7: Conserving and enhancing the historic townscape</p> | <p>Overall, the draft plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to minor positive effects, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.</p> <p>Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains uncertain at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout, and integration.</p> |
| <p>SA-8: Requiring good urban design in Portsmouth</p> | <p>The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility, and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines minor long-term positive effects are considered likely overall.</p> |
| <p>SA-9: Conserving and enhancing the natural environment in Portsmouth</p> | <p>In line with the findings of the HRA, at this stage the potential for significant negative effects in relation to this SA objective are identified, and it will be down to sufficient delivery of compensatory measures to reduce the extent of these effects. The benefits of the allocation and IROPI will ultimately be weighted by plan-makers against these likely impacts.</p> |
| <p>SA-10: Facilitating the sustainable use of natural resources in Portsmouth</p> | <p>The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural resources that support the ecosystems and green infrastructure network of the city. The spatial strategy</p> |

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SA objective

Plan appraisal conclusion

and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, **minor long-term positive effects** are concluded as likely.

A range of potential effects are identified overall and whilst potential significant effects are predominantly positive in nature, it is recognised that (in line with the findings of the HRA) significant negative effects are also considered likely in relation to the loss of functional habitat at internationally and nationally designated biodiversity sites. This will require compensatory measures and continued monitoring.

The SA has made recommendations at each stage of SA that have been taken into consideration by PCC.

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4. Next steps

Introduction

Part 3 of the SA Report summarises the next steps plan-making and the SA.

Next steps

This SA Report will accompany the Local Plan for pre-submission (Regulation 19) public consultation. Any comments received will be reviewed and considered. The representations received along with any further evidence base work, including further SA work, will inform the submission version of the Local Plan, which the Council currently aims to submit for Independent Examination in 2024.

Monitoring

It is anticipated that monitoring will be undertaken as part of the Council's annual monitoring process, as reported through yearly Authority Monitoring Reports. Any additional monitoring requirements, if deemed necessary through the final plan-making stages, will be identified in the SA Adoption Statement (produced at the time of adoption of the plan).

Habitat Regulations Assessment of the Portsmouth Local Plan

Regulation 19

Portsmouth Council

Project number: 60586784

April 2024

Quality information

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1. Introduction

Background

- 1.1 AECOM was appointed by Portsmouth City Council (PCC) in 2020 to undertake Habitats Regulations Assessments of its Local Plan (the PLP). An HRA including both Test of Likely Significant Effects and Appropriate Assessment was produced in 2021 to accompany the Regulation 18 Draft Local Plan. This current report is a Habitats Regulations Assessment (HRA) of its Regulation 19 Draft Local Plan and builds on the previous HRA for the Regulation 18 version. The objective of this assessment was to identify any aspects of the Plan that might cause Likely Significant Effects (LSEs) on, or adverse effects on the integrity of, Habitats sites (also known as “European sites”), namely Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (SACs), potential Special Protection Areas (pSPAs) and, as a matter of Government policy, Ramsar sites. The assessment is undertaken alone and where necessary in-combination with other plans and projects. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment is required where a plan or project is likely to have a significant effect upon a Habitats Site, either individually or ‘in combination’ with other projects. Should the HRA identify potential adverse effects, it also advises on appropriate policy mechanisms for delivering mitigation. Should it not prove possible to avoid or mitigate all adverse effects on integrity a further post-Appropriate Assessment stage is required which involves a series of derogation tests which must be passed before the Local Plan can be adopted.
- 1.2 Portsmouth City lies adjacent to the Solent on the southern coast of England. Being an island, it has a unique geographic location and relationship to the sea. The authority comprises approx. 40.1km² and is home to approx. 208,100 people, with a population density higher than some parts of London. The Reg 19 PLP seeks to deliver an ambitious vision of sustainable growth across the plan period 2020 – 2040. It allocates overall quanta for development and growth, including at Strategic Sites where this growth will be focused. The PLP provides a target of 13,603 new residential dwellings and 138,429m² of employment floorspace in Portsmouth City between 2020 and 2040. This does not meet the housing need in the City as defined by the standard methodology and explored further in the Housing and Economic Development Needs Assessment (HEDNA¹) due to its constrained geography and the need to protect the City’s rich environmental, cultural and historical heritage.
- 1.3 Despite its highly urban nature, Portsmouth City is also surrounded by statutory sites designated for their conservation interest: the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar, the Solent & Dorset Coast SPA and the Solent Maritime SAC. Further Habitats sites lie within 10km of the city’s boundary, including the Solent & Isle of Wight Lagoons SAC and the Solent & Southampton Water SPA / Ramsar.. These SPAs / Ramsars / SACs have a special significance for their breeding (in the case of tern species) and overwintering bird populations of international importance and (in the case of the Solent Maritime SAC) for a range of maritime and coastal habitats.
- 1.4 The wider Solent area is generally regarded as a region of significant ecological value and sensitivity. Given the urban nature of southern Hampshire, an extensive evidence base relating to potential impact pathways has been developed. Furthermore, there are well-established issues (e.g. recreational disturbance and functionally linked habitat loss) for which strategic mitigation measures have already been developed. These include the Bird Aware Solent project and the Solent Waders and Brent Goose Strategy (SWBGS), from which the HRA draws where relevant. Furthermore, the PLP includes several proposals (e.g. Policy PLP3) that will require their own bespoke assessment when proposals are more developed for subsequent planning applications and Transport & Works Act Orders. However, they are discussed as fully as possible at this time in the Regulation 19 HRA.

Legislation

- 1.5 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). The UK is no longer a member of the European Union. However, Habitats Regulations Assessment continues as set out in the Conservation of Habitats and

¹ Housing and Economic Development Needs Assessment

Species (Amendment) (EU Exit) Regulations 2019². Figure 1 below sets out the legislative basis for the HRA.

- 1.6 The HRA process applies the 'Precautionary Principle'³ to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity (coherence of structure and function) of the Habitats site(s) in question. Plans and projects with predicted adverse impacts on Habitats sites may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network. In order to ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question. If site integrity will be harmed a series of derogation tests (Alternative Solutions, IROPI and Compensatory Measures) must be passed before the Local Plan can be adopted.

Conservation of Habitats and Species Regulations 2017 (as amended)

Regulation 105
Where a land use plan—

- (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
- (b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

(2) The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.

(3) The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.

(4) In the light of the conclusions of the assessment, and subject to regulation 107, the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

Regulation 107

(1) If the plan-making authority is satisfied that, there being no alternative solutions, the land use plan must be given effect for imperative reasons of overriding public interest (which, subject to paragraph (2), may be of a social or economic nature), it may give effect to the land use plan notwithstanding a negative assessment of the implications for the European site or the European offshore marine site (as the case may be).

(2) Where the site concerned hosts a priority natural habitat type or a priority species, the reasons referred to in paragraph (1) must be either—

- (a) reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or
- (b) any other reasons which the plan-making authority, having due regard to the opinion of the European Commission, considers to be imperative reasons of overriding public interest.

Regulation 109
Where in accordance with regulation 107 a land use plan is given effect notwithstanding a negative assessment of the implications for a European site or a European offshore marine site, the appropriate authority must secure that any necessary compensatory measures are taken to ensure that the overall coherence of the National Site Network is protected.

Figure 1: The legislative basis for the HRA process

² these don't replace the 2017 Regulations but are just another set of amendments

³ The Precautionary Principle, The Precautionary Principle assists the decision-making process in the face of a lack of scientific certainty. The Rio Declaration 1992 defines the principle as follows: "where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

- 1.7 For the purposes of the Portsmouth Local Plan and the associated HRA, Portsmouth City Council is the plan-making authority (essentially, the competent authority for the plan). The 'appropriate authority' for the purpose of regulation 109 is the Secretary of State.
- 1.8 Over time the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.
- 1.9 As the legislative basis for HRAs derives, historically, from EU law, much of the relevant case law that defines the meaning and scope of the requirements of HRA is from the European Court of Justice. Although no longer binding in UK law, the jurisprudence of the European Court of Justice is still considered relevant and persuasive and is referred to in this HRA.

Scope of the Project

- 1.10 There is no guidance that dictates the physical scope of an HRA of a Plan document in all circumstances. Therefore, in considering the physical scope of the assessment, AECOM was guided primarily by the identified impact pathways (called the source-pathway-receptor model). Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats designated site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect Habitats sites by, for example, disturbance of wintering or breeding birds. The following Habitats sites were included in the scope of assessment:
 - All sites within the boundary of Portsmouth City; and,
 - Other sites shown to be linked to development within the authority boundary through a known impact 'pathway' (discussed below); generally, to a distance of 10km.
- 1.11 These distances were then refined for individual impact pathways based upon guidance and data discussed in Section 4.
- 1.12 In order to fully inform the screening process and / or Appropriate Assessment, a number of documents and studies have been consulted to form the evidence base for this HRA. These include:
 - Future development proposed in the Local Plans for adjoining authorities and their accompanying HRAs (where available):
 - Eastleigh Local Plan (adopted 2022)
 - Southampton Local Plan (Core Strategy and Local Plan Review adopted 2015)
 - Fareham Local Plan (adopted 2023)
 - Gosport Local Plan (adopted 2015, new Regulation 18 Local Plan dated 2021)
 - Havant Local Plan (adopted 2011, new Local Plan being developed)
 - East Hampshire Local Plan (Joint Core Strategy adopted 2014, new Local Plan being produced)
 - New Forest District Local Plan (adopted 2020)
 - New Forest National Park Local Plan (adopted 2020)
 - Winchester Local Plan (Core Strategy adopted 2013, new Local Plan being produced)
 - Chichester Local Plan (adopted 2015, new Local Plan being produced)
 - Isle of Wight Local Plan (adopted 2012; new Local Plan being produced)

- Solent Disturbance and Mitigation Project (SDMP) Phases 1 to 3 (the SDMP involved numerous research studies, including visitor surveys, bird disturbance fieldwork and a modelling study) and the resulting Bird Aware Solent mitigation project⁴;
- Solent Waders and Brent Goose Strategy (SWBGS, identifies supporting habitats important to Solent's SPAs / Ramsars)⁵;
- Conservation Objectives and Supplementary Advice on the Conservation Objectives for Habitats sites;
- Traffic modelling undertaken on behalf of Portsmouth City Council;
- Partnership for South Hampshire Spatial Position Statement 2023⁶
- The 2022 Water Resources Management Plan (WRMP) and East Hampshire Drainage and Wastewater Management Plan published by Portsmouth Water and their HRAs;
- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk)

The Layout of this Report

- 1.13 Chapter 2 of this report explains the methodology by which this HRA has been carried out, including the three core stages (screening for Likely Significant Effects, Appropriate Assessment (including mitigation) and Derogations) that constitute the HRA process. Chapter 3 provides detail on the Habitats sites relevant to Portsmouth City, including an introduction to the sites, a summary of their qualifying habitats / species, Natural England Conservation Objectives and the current threats and pressures operating in these sites. Detailed background on the main impact pathways identified in relation to the PLP and Habitats Sites is provided in Chapter 4. Chapter 5 sets out the screening assessment of Likely Significant Effects (LSEs) of the Plan's policies (see Appendix B for the screening tables of Plan policies and site allocations). Chapter 6 presents the Appropriate Assessment of the impact pathways and Plan policies for which LSEs could not be excluded. The conclusions and recommendations arising from the HRA process are set out in Chapter 7. Chapter 8 assesses those parts of the Local Plan that are considered to have adverse effects on the integrity of designated sites against the statutory derogation tests.

Quality Assurance

- 1.14 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.
- 1.15 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2017).

⁴ http://www.solentems.org.uk/natural_environment_group/SRMP/SDMP/

⁵ <https://solentwbgs.wordpress.com/>

⁶ [PfSH Spatial Position Statement 2023 - Partnership for South Hampshire \(push.gov.uk\)](#)

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general European Commission guidance on HRA⁷ and that produced in July 2019 and February 2021 (minor updates December 2023) by the UK government⁸.
- 2.2 Figure 2 below outlines the stages of HRA according to current UK government guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan.

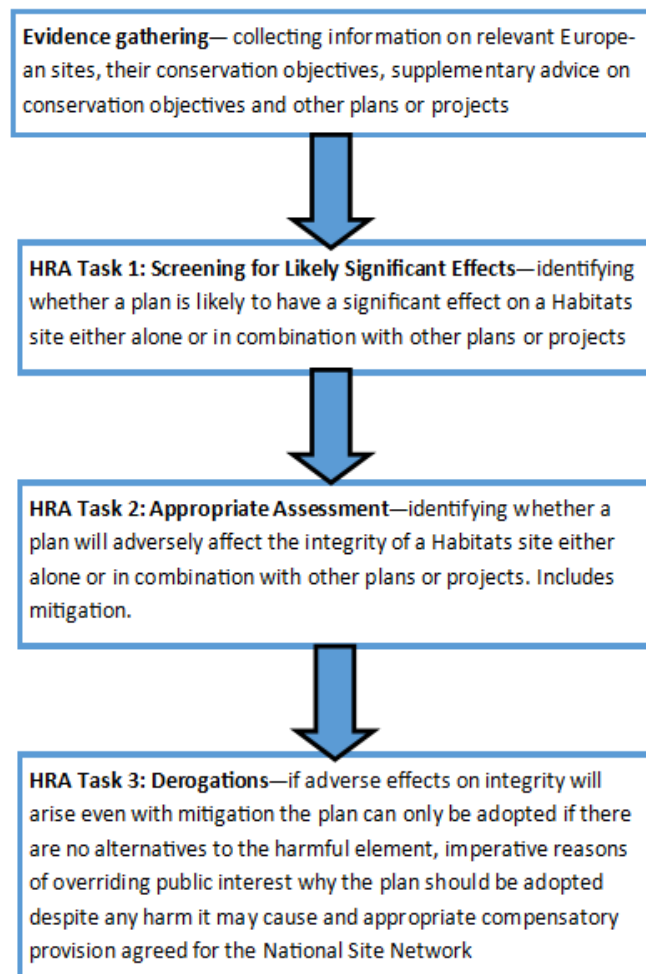


Figure 2: Three Stage Approach to Habitats Regulations Assessment.

Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects (LSE)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test also known as Screening - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is: *"Is the project,*

⁷ European Commission (2022): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁸ <https://www.gov.uk/guidance/appropriate-assessment> and [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site)

either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"

- 2.4 Case law has established that, 'likely' in the context of this stage means 'possible' and a 'significant' effect is one where reasonable scientific doubt remains as to whether it would affect the ability of a Habitats site to achieve its Conservation Objectives. Screening for LSE comprises a two-fold approach of (a) identifying whether any policies are associated with negative impact pathways and (b) determining whether Habitats sites might be affected. The HRA appraises each plan policy or allocation and concludes whether it can be dismissed from consideration, primarily because it will not promote or deliver housing, infrastructure, or employment development. The HRA then considers the Habitats sites that may be impacted by identified policies or allocations, based on known sensitivities and the presence of any linking impact pathways.
- 2.5 The objective is to 'screen out' those plans and projects where likely significant effects upon Habitats sites can be excluded. This stage is set out in Chapter 5 of this report and in Appendix B.
- 2.6 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding impacts of development on the Habitats sites considered within this assessment.
- 2.7 In spring 2018 the 'Sweetman' European Court of Justice ruling⁹ clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA has been cognisant of that ruling.

HRA Task 2 – Appropriate Assessment (AA)

- 2.8 Where it is determined that Likely Significant Effects cannot be excluded the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.
- 2.9 By virtue of the fact that it follows the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, this Appropriate Assessment considers those policies and allocations where LSEs could not be excluded through screening and assesses the potential for adverse effects in more detail, with a view to concluding whether there would actually be an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats site(s)).
- 2.10 Further, this AA also considers the effects of policies and allocations on habitat types and species that are not themselves listed but are necessary to the conservation of the designated habitat types and species, as required by the Holohan ruling¹⁰. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. This has been considered in relation to the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC, which all support mobile overwintering waterfowl and waders.

Avoidance and Mitigation

- 2.11 Where necessary, this HRA recommends measures for incorporation into the Plan in order to avoid or mitigate adverse effects on Habitats sites. When discussing 'mitigation' for a Local Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the detail of the mitigation measures themselves since the Local Plan document is a high-level policy document.
- 2.12 In accordance with established precedent, the level of detail required in the PLP to avoid or mitigate adverse effects is therefore dependent on the nature of the impacts. For example, for recreational impacts, it is not

⁹ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

¹⁰ Case C-461/17

necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

- 2.13 The Court of Appeal has ruled that providing the Council (plan making authority and competent authority) is duly satisfied that proposed mitigation could be '*achieved in practice*' to satisfy that the proposed development would have no adverse effect, then this will suffice at the plan-making stage¹¹.

HRA Task 3 – Derogations

- 2.14 In certain circumstances, a plan making authority/competent authority can adopt a plan or permit a proposal, notwithstanding the fact that the AA concludes it will have adverse effects on the integrity of a Habitats site. This is known as a derogation. A Local Plan (or the relevant part of the Local Plan that triggers the derogations) must pass each of the following three sequential legal tests for a derogation to be granted.

1. There are no feasible alternative solutions that would be less damaging to the Habitats site while still meeting the objective of the plan or proposal.
2. The proposal needs to be carried out for imperative reasons of overriding public interest.
3. The necessary compensatory measures can be secured.

- 2.15 There is a distinction between the level of detail required in a Local Plan for it to pass the derogation tests, and that required for a subsequent planning application. This is because a plan is an intentionally higher-tier document that by design does not present all the details for a particular proposal and leaves flexibility for design of a subsequent planning application including as regards avoidance, mitigation and compensation of adverse effects on a Habitats site. In contrast, once planning permission is granted there is no further tier in the planning approval process. As such all matters regarding the derogations including compensation must be fully detailed at the time planning consent is granted.

- 2.16 HRA is required at both the plan-making stage and the planning application stage. However, this tiered approach to the level of detailed required at each stage reflects Advocate-General Kokott's advice on HRA in multi-stage planning processes : '*It would also hardly be proper to require a greater level of detail in preceding plans [than lower tier plans or planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure*'¹².

At the plan-making stage, the decision maker must be satisfied that the derogation test are met at the strategic plan level and are capable of being met at the project level.

Test 1: Consider Alternative Solutions

- 2.17 To allow a derogation the plan making authority must decide that there is no alternative solution that would be less damaging to the site while still meeting the objective of the plan. The plan making authority should work with the proposer and consider whether any alternative solutions are available. This might include considering whether the proposal could:

- be delivered at a different location
- use different routes across a site
- change its scale, size, design, method or timing

- 2.18 To constitute a genuine alternative solution, the alternative must:

- achieve the same overall objective as the original proposal

¹¹ No Adastral New Town Ltd v Suffolk Coastal DC [2015] EWCA Civ 88; see also *R (Wingfield) v Canterbury CC* [2019] EWHC 1974 (Admin)

¹² Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49.
<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

- be financially, legally and technically feasible
 - be less damaging to the relevant Habitats site and not have an adverse effect on the integrity of any other Habitats site
- 2.19 If there are, or appear to be, one or more alternative solutions, the plan making authority cannot include the original proposal within the local plan. In those circumstances, there is no need to do test 2 or test 3.
- 2.20 If there are no alternative solutions, the proposal passes test 1 and the plan making authority can move to test 2.

Test 2: Consider imperative reasons of overriding public interest

- 2.21 If there are no feasible alternative solutions, the plan making authority must next be able to show that there are imperative reasons of overriding public interest (IROPI) why the proposal must go ahead.
- 2.22 The plan making authority must decide if the need for the proposal is:
- imperative - it is essential that it proceeds
 - in the public interest – it delivers a public interest benefit, not just benefits for private interests
 - overriding - the imperative public interest outweighs the harm, or risk of harm, to the integrity of the Habitats site that is predicted by the appropriate assessment.
- 2.23 According to government guidance, plans or projects that only provide short-term or very localised benefits are less likely to be able to show imperative reasons of overriding public interest than more strategic plans or projects.
- 2.24 Some of the designated habitats and species of SACs are considered to be a Europe-wide 'priority habitats' in danger of disappearance, as defined in the Habitats Directive. Where such priority habitats are at play, there is a stricter test applied at the IROPI stage. However, there are no such habitats in affected Habitats sites associated with the Portsmouth Local Plan.

Test 3: Secure compensatory measures

- 2.25 If there are no feasible alternative solutions and the plan making authority has shown that there are imperative reasons of overriding public interest, it is necessary to make sure that suitable compensatory measures are capable of being secured at the planning application stage. Such measures will need to fully offset the harm to coherence of structure and function (effect on integrity) which will or could be caused to the site.
- 2.26 While there is no precedent in the UK for a local authority to have relied on derogations in the adoption of a local plan, there is considerable precedent within the realm of coastal defence, where it is common for Shoreline Management Plans and Coastal Strategies to rely on the derogations. For example, the North Solent Shoreline Management Plan was adopted in reliance on the derogations tests, while the Hayling Island Coastal Management Strategy is currently being assessed against the derogations tests. In these and similar examples the focus at the plan-making stage is to ensure that there is scope for suitable compensatory provision (including its scale, its technical feasibility, and the likelihood that adequate areas for compensation can be identified), with the precise details of the specific compensation parcels to be secured, and technical matters such as landowners agreements, to be deferred to the individual scheme (planning application) level.
- 2.27 The derogation section of this HRA therefore seeks to explore whether a sufficient framework exists to ensure that suitable compensation is capable of being delivered when and where it is needed, and that there is a high degree of confidence that sufficient land in appropriate places will be available for the compensation to be delivered.
- 2.28 Once the derogation tests have been satisfied, there will be a pre-submission consultation. The consultation results will be considered in regard to the test of soundness, and the Local Plan will then be submitted for examination. Following examination, the derogations documentation will be finalised and submitted to the 'appropriate authority' (the relevant Secretary of State) in line with Regulation 107 of the Habitats Regulations, which provides that the appropriate authority has 21 days to prohibit adoption of the Local Plan, based on the derogations materials. The appropriate authority may do this either indefinitely or during such period as may be specified in the direction.

Geographic Scope of the HRA

2.29 There are no standard criteria for determining the ultimate physical scope of an HRA. Rather, the source-pathway-receptor model should be used to determine whether there is any potential pathway connecting development to any Habitats sites. In the case of Portsmouth City, it was determined that for the initial coarse screen the following Habitats Sites required consideration:

- Portsmouth Harbour SPA / Ramsar;
- Chichester and Langstone Harbours SPA / Ramsar;
- Solent Maritime SAC;
- Solent and Dorset Coast SPA;
- Solent & Southampton Water SPA / Ramsar; and
- Solent & Isle of Wight Lagoons SAC.

2.30 This was based upon a search within Portsmouth City and up to 10km surrounding the authority boundary. All above sites were subjected to the initial screening exercise. It should be noted that the presence of a conceivable impact pathway linking the emerging PLP to a Habitats site does not mean that Likely Significant Effects (LSEs) will occur.

3. Habitats Sites

Introduction

3.1 The following Habitats sites are situated within 10km of the Portsmouth City boundary:

- Portsmouth Harbour SPA / Ramsar;
- Chichester and Langstone Harbours SPA / Ramsar;
- Solent Maritime SAC;
- Solent and Dorset Coast SPA;
- Solent & Southampton Water SPA / Ramsar; and
- Solent and Isle of Wight Lagoons SAC.

3.2 Due to development being within the 10km screening distance, there are potential negative impacts on these sites of conservation interest. They thus need to be considered in more detail. The following section provides an introduction, the qualifying features, the conservation objectives and the threats / pressures to each of these Habitats sites.

Portsmouth Harbour SPA / Ramsar

Introduction

3.3 This Habitats site is an industrialised estuary located centrally on the Solent. It comprises one of the four largest expanses of mud-flats and tidal creeks in southern England. These mud-flats support a diverse assemblage of aquatic plants, including narrow-leaved eelgrass *Zostera angustifolia*, dwarf eelgrass *Zostera noltii* and sea lettuce *Ulva lactuca*. Portsmouth Harbour is connected to the sea via a narrow section of the Solent and only receives small quantities of freshwater (e.g. from the River Wallington), therefore possessing a unique hydrology. The site supports significant numbers of wintering dark-bellied brent geese *Branta b. bernicla*, which are known to feed extensively in surrounding agricultural areas outside the SPA boundary.

SPA Qualifying Features¹³

3.4 This site qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of Habitats importance of the following migratory species:

Over winter:

- Dark-bellied brent goose *Branta bernicla bernicla*: 2,847 individuals representing at least 0.9% of the wintering Western Siberia / Western Europe population (5 year peak mean 1991/2 – 1995/6)
- Red-breasted merganser *Mergus serrator*: 87 individuals (non-breeding)
- Dunlin *Calidris alpina alpina*: 5,123 individuals (non-breeding)
- Black-tailed godwit *Limosa limosa islandica*: 31 individuals (non-breeding)

Ramsar Qualifying Features¹⁴

3.5 Portsmouth Harbour qualifies as a Ramsar site under the following criteria:

¹³ Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9011051.pdf> [Accessed on the 20/12/2023]

¹⁴ Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11055.pdf> [Accessed on the 20/12/2023]

Criterion 3

The intertidal mudflat areas possess extensive beds of eelgrass *Zostera angustifolia* and *Zostera noltei* which support the grazing dark-bellied brent geese populations. The mud-snail *Hydrobia ulvae* is found at extremely high densities, which helps to support the wading bird interest of the site. Common cord-grass *Spartina anglica* dominates large areas of the saltmarsh and there are also extensive areas of green algae *Enteromorpha* spp. and sea lettuce *Ulva lactuca*. More locally the saltmarsh is dominated by sea purslane *Halimione portulacoides* which gradates to more varied communities at the higher shore levels. The site also includes a number of saline lagoons hosting nationally important species.

Criterion 6 Species / populations occurring at levels of international importance

Qualifying species / populations (as identified at designation):

Species with peak counts in winter

- Dark-bellied brent goose *Branta bernicla bernicla*; 2,105 individuals, representing an average of 2.1% of the GB population (5 year peak mean 1998/9 – 2002/3)

SPA Conservation Objectives¹⁵

- 3.6 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.7 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
 - The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

Threats / Pressures to Site Integrity¹⁶

- 3.8 The following threats and pressures to the integrity of the Portsmouth Harbour SPA have been identified in the Natural England Site Improvement Plan:
 - Public access / disturbance
 - Coastal squeeze
 - Fisheries: Commercial marine and estuarine
 - Water pollution
 - Changes in species distribution
 - Climate change
 - Change to site conditions
 - Invasive species
 - Direct land take from development
 - Biological resource use
 - Change in land management

¹⁵ Available at: <http://publications.naturalengland.org.uk/publication/4857883850178560> [Accessed on the 03/11/2020]

¹⁶ Available at: <http://publications.naturalengland.org.uk/publication/4692013588938752> [Accessed on the 03/11/2020]

- Inappropriate pest control
- Air pollution: Impact of atmospheric nitrogen deposition
- Hydrological changes
- Extraction: Non-living resources

Chichester and Langstone Harbours SPA / Ramsar

Introduction

3.9 The Chichester and Langstone Harbours SPA / Ramsar is a complex of large, sheltered estuarine basins comprising sand- and mud-flats that are exposed at low tide. The two harbours are connected via a stretch of water that separates Hayling Island from the mainland. Some tidal channels drain the basin and reach far inland. The mud-flats harbour a rich assemblage of invertebrates and algae, such as *Enteromorpha* spp. and eelgrasses *Zostera* spp. The wide range of habitats present in the Chichester and Langstone Harbours SPA / Ramsar support key animal communities. These include significant numbers of waterbirds during migration and over winter. Furthermore, the site supports important colonies of breeding terns, which are rare in southern England.

SPA Qualifying Features¹⁷

3.10 This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations of Habitats importance of the following species listed on Annex I of the Directive:

During the breeding season:

- Little tern *Sterna albifrons*; 100 pairs representing up to 4.2% of the breeding population in Great Britain (5 year mean, 1992 – 1996)
- Sandwich tern *Sterna sandvicensis*; 158 pairs representing up to 1.1% of the breeding population in Great Britain (1998)
- Common tern *Sterna hirundo*; 126 pairs (5 year mean, 2011-2015)

On passage:

- Little egret *Egretta garzetta*; 137 individuals representing up to 17.1% of the population in Great Britain (Count as at 1998)

Over winter:

- Bar-tailed godwit *Limosa lapponica*; 1,692 individuals representing up to 3.2% of the wintering population in Great Britain (5 year peak mean 1991/2 – 1995/6)
- Little egret *Egretta garzetta*; 100 individuals representing up to 20% of the wintering population in Great Britain (Count as at 1998)

3.11 This site qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of Habitats importance of the following migratory species:

On passage:

- Ringed Plover *Charadrius hiaticula*; 2,471 individuals representing up to 4.9% of the Europe/Northern Africa - wintering population (5 year peak mean 1991/2 - 1995/6)

Over winter:

- Black-tailed Godwit *Limosa limosa islandica*; 1,003 individuals representing up to 1.4% of the wintering Iceland - breeding population (5 year peak mean 1991/2 - 1995/6)

¹⁷ Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9011011.pdf> [Accessed on the 20/12/2023]

- Dark-bellied brent Goose *Branta bernicla bernicla*; 17,119 individuals representing up to 5.7% of the wintering Western Siberia/Western Europe population (5 year peak mean 1991/2 - 1995/6)
- Dunlin *Calidris alpina alpina*; 44,294 individuals representing up to 3.2% of the wintering Northern Siberia/Europe/Western Africa population (5 year peak mean 1991/2 - 1995/6)
- Grey Plover *Pluvialis squatarola*, 3,825 individuals representing up to 2.5% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
- Redshank *Tringa totanus*; 1,788 individuals representing up to 1.2% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
- Ringed Plover *Charadrius hiaticula*, 846 individuals representing up to 1.7% of the wintering Europe/Northern Africa - wintering population (5 year peak mean 1991/2 - 1995/6)
- Common shelduck *Tadorna tadorna*; 1,096 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Eurasian wigeon *Anas Penelope*; 3,947 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Eurasian teal *Anas crecca*; 1,953 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Northern pintail *Anas acuta*; 338 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Northern shoveler *Anas clypeata*; 106 individuals wintering populations (5 year peak mean 2009/10 – 2013/14)
- Red-breasted merganser *Mergus serrator*; 366 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Sanderling *Calidris alba*; 216 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Eurasian curlew *Numenius arquata*; 3,181 individuals wintering population (5 year peak mean 2009/10 – 2013/14)
- Ruddy turnstone *Arenaria interpres*; 501 individuals wintering population (5 year peak mean 2009/10 – 2013/14)

3.12 Assemblage qualification: A wetland of international importance.

The area qualifies under **Article 4.2** of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl

Over winter, the area regularly supports 93,142 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Wigeon *Anas penelope*, Bar-tailed Godwit *Limosa lapponica*, Dark-bellied brent Goose *Branta bernicla bernicla*, Ringed Plover *Charadrius hiaticula*, Grey Plover *Pluvialis squatarola*, Dunlin *Calidris alpina alpina*, Black-tailed Godwit *Limosa limosa islandica*, Redshank *Tringa totanus*, Little Grebe *Tachybaptus ruficollis*, Little Egret *Egretta garzetta*, Shelduck *Tadorna tadorna*, Curlew *Numenius arquata*, Teal *Anas crecca*, Pintail *Anas acuta*, Shoveler *Anas clypeata*, Red-breasted Merganser *Mergus serrator*, Oystercatcher *Haematopus ostralegus*, Lapwing *Vanellus vanellus*, Knot *Calidris canutus*, Sanderling *Calidris alba*, Cormorant *Phalacrocorax carbo*, Whimbrel *Numenius phaeopus*.

Ramsar Qualifying Features¹⁸

3.13 The Chichester and Langstone Harbours qualify as a Ramsar site under the following criteria:

Criterion 1

Two large estuarine basins linked by the channel which divides Hayling Island from the main Hampshire coastline. The site includes intertidal mudflats, saltmarsh, sand and shingle spits and sand dunes.

¹⁸ Available at: <http://jncc.defra.gov.uk/pdf/RIS/UK11013.pdf> [Accessed on the 03/11/2020]

Criterion 5

Assemblages of international importance

Species with peak counts in winter

76,480 waterfowl (5 year peak mean 1998/99 – 2002/03)

Criterion 6 Species / populations occurring at levels of international importance

Qualifying species / populations (as identified at designation):

Species with peak counts in spring / autumn

- Ringed plover *Charadrius hiaticula*, Europe / Northwest Africa: 853 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9 – 2002/3)
- Black-tailed godwit *Limosa limosa islandica*, Iceland / W Europe: 906 individuals, representing an average of 2.5% of the population (5 year peak mean 1998/9 – 2002/3)
- Common redshank *Tringa totanus totanus*: 2,577 individuals, representing an average of 1% of the population (5 year peak mean 1998/9 – 2002/3)

Species with peak counts in winter

- Dark-bellied brent goose *Branta bernicla bernicla*: 12,987 individuals, representing an average of 6% of the population (5 year peak mean 1998/9 – 2002/3)
- Common shelduck *Tadorna tadorna*, NW Europe: 1,468 individuals, representing an average of 1.8% of the GB population (5 year peak mean 1998/9 – 2002/3)
- Grey plover *Pluvialis squatarola*, E Atlantic / W Africa – wintering: 3,043 individuals, representing an average of 1.2% of the population (5 year peak mean 1998/9 – 2002/3)
- Dunlin *Calidris alpina alpina*, W Siberia / W Europe: 33,436 individuals, representing an average of 2.5% of the population (5 year peak mean 1998/9 – 2002/3)

Species / populations identified subsequent to designation for possible future consideration under criterion 6.

Species regularly supported during the breeding season

- Little tern *Sterna albifrons albifrons*, W Europe: 130 apparently occupied nests, representing an average of 1.1% of the breeding population

SPA Conservation Objectives¹⁹

- 3.14 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.15 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

¹⁹ Available at: <http://publications.naturalengland.org.uk/publication/5789102905491456> [Accessed on the 03/11/2020]

Threats / Pressures to Site Integrity²⁰

3.16 The following threats and pressures to the integrity of the Portsmouth Harbour SPA have been identified in the Natural England Site Improvement Plan:

- Public access / disturbance
- Coastal squeeze
- Fisheries: Commercial marine and estuarine
- Water pollution
- Changes in species distribution
- Climate change
- Change to site conditions
- Invasive species
- Direct land take from development
- Biological resource use
- Change in land management
- Inappropriate pest control
- Air pollution: Impact of atmospheric nitrogen deposition
- Hydrological changes
- Extraction: Non-living resources

Solent Maritime SAC

Introduction

3.17 The Solent comprises a major estuarine system on the south coast of England with four coastal plain estuaries and four bar-built estuaries. The maritime SAC is the only site that contains a cluster of physiographic sub-types of estuary. Furthermore, in contrast to all other Habitats estuaries, the Solent has a unique hydrographic regime consisting of four tides per day.

3.18 The site also harbours a complex array of marine and estuarine habitats. Sediment habitats in the estuarine system include extensive estuarine flats with intertidal areas, supporting eelgrass *Zostera* spp., green algae, sand and shingle spits, and shoreline transitions. Mudflat habitats range from low or variable salinity in the upper reaches of the estuaries to fully marine mudflats in Chichester and Langstone Harbours. Unusual species in these habitats include rare sponges, communities of a polychaete *Sabellaria spinulosa* and smooth cord-grass *Spartina alterniflora*.

3.19 Within the Solent Maritime SAC, the second-largest aggregation of Atlantic salt meadows in south / south-west England is located. The saltmarsh is present as a large number of disjointed habitat patches. This ungrazed aquatic plant community is dominated by sea-purslane *Atriplex portulacoides*, common sea-lavender *Limonium vulgare* and thrift *Armeria maritima*. Overall, the site is less disturbed by man-made structures than other parts of the southern coast.

Qualifying Features²¹

3.20 Annex I habitats that are a primary reason for selection of this site:

²⁰ Available at: <http://publications.naturalengland.org.uk/publication/4692013588938752> [Accessed on the 03/11/2020]

²¹ Available at: <https://sac.incc.gov.uk/site/UK0030059> [Accessed on the 20/12/2023]

- Estuaries
- *Spartina* swards (*Spartinion maritimae*)
- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

3.21 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Sandbanks which are slightly covered by sea water all the time
- Mudflats and sandflats not covered by sea water at low tide
- Coastal lagoons
- Annual vegetation of drift lines
- Perennial vegetation of stony banks
- *Salicornia* and other annuals colonizing mud and sand
- Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes')

3.22 Annex II species present as a qualifying feature, but not a primary reason for site selection

- Desmoulin's whorl snail *Vertigo moulinsiana*

Conservation Objectives²²

3.23 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.24 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity²³

3.25 The following threats and pressures to the integrity of the Portsmouth Harbour SPA have been identified in the Natural England Site Improvement Plan:

- Public access / disturbance
- Coastal squeeze
- Fisheries: Commercial marine and estuarine
- Water pollution
- Changes in species distribution
- Climate change
- Change to site conditions

²² Available at: <http://publications.naturalengland.org.uk/publication/4857883850178560> [Accessed on the 03/11/2020]

²³ Available at: <http://publications.naturalengland.org.uk/publication/4692013588938752> [Accessed on the 03/11/2020]

- Invasive species
- Direct land take from development
- Biological resource use
- Change in land management
- Inappropriate pest control
- Air pollution: Impact of atmospheric nitrogen deposition
- Hydrological changes
- Extraction: Non-living resources

Solent and Dorset Coast SPA

Introduction

- 3.26 The Solent and Dorset Coast was designated as a SPA on the 16th of January 2020. The site is approx. 89,078.02ha in size and extends from the isle of Purbeck in the west to Bognor Regis in the east, following the coastline of southern England. The site boundary includes the sub-tidal areas not encompassed by the other SPAs / Ramsars in the Solent, with the landward boundary at the mean low water (MLW) line where it abuts other SPAs / Ramsars and the mean high water (MHW) line elsewhere (to provide protection to the intertidal zone).
- 3.27 The SPA was designated to specifically protect essential foraging areas at sea used by qualifying tern species (common tern, sandwich tern and little tern) of other nearby SPA / Ramsar sites. All three tern species use the open water along the coastline to plunge dive for foraging resources. The site (as outlined in 2020) supports over 1% of the GB breeding population of all three tern species. The overall site boundary of the SPA has been established using data on the foraging ranges of terns (e.g. mean and maximum foraging ranges for little terns of 2.1km and 6.3km respectively) and applying these as buffer zones around known tern nesting sites.

Qualifying Features²⁴

- 3.28 This site qualifies under Article 4 of the Birds Directive (2009/147/EC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

During the breeding season;

- Sandwich tern *Sterna sandvicensis*, 441 pairs representing at least 4.01% of the breeding population in Great Britain (2008-2014)
- Common tern *Sterna hirundo*, 492 pairs representing at least 4.77% of the breeding population in Great Britain (2008-2014)
- Little tern *Sterna albifrons*, 63 pairs representing at least 3.31% of the breeding population in Great Britain (2008-2014)

Conservation Objectives²⁵

- 3.29 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.30 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features

²⁴ Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020330.pdf> [Accessed on the 20/12/2023]

²⁵ Available at: <http://publications.naturalengland.org.uk/publication/5294923917033472> [Accessed on the 20/12/2023]

- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Threats / Pressures to Site Integrity

3.31 To date, a Site Improvement Plan for the Solent and Dorset Coast SPA has not been published. However, given similar qualifying species to the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar, it is likely that the threats and pressures to site integrity will be similar. The following issues have been identified in the Site Improvement Plan for the wider Solent area²⁶ (note only the ones relevant to terns are presented here):

- Public access / disturbance
- Fisheries: Commercial marine and estuarine
- Water pollution
- Changes in species distribution
- Climate change
- Change to site conditions
- Biological resource use
- Change in land management
- Air pollution: Impact of atmospheric nitrogen deposition
- Hydrological changes

Solent and Southampton Water SPA / Ramsar

Introduction

3.32 The Solent and Southampton Water SPA / Ramsar covers an expansive area on the south England coast from Hurst Spit to Hill Head on the coast of Hampshire, and from Yarmouth to Whitecliff Bay along the north coast of the Isle of Wight. It is composed of several estuaries and harbours with mudflats, saltmarshes, saline lagoons, shingle beaches, reedbeds, damp woodland and grazing marsh.

3.33 The mudflats support beds of *Enteromorpha* spp. and *Zostera* spp., and harbour a rich assemblage of invertebrates that forms the main food source for estuarine birds. In the breeding season in summer, the site is important for seabirds such as gulls and terns. In winter the SPA holds a significant assemblage of waterfowl, including geese, ducks and waders. The brent goose *Branta bernicla bernicla* is known to feed in areas of surrounding agricultural land.

SPA Qualifying Features²⁷

3.34 This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

During the breeding season;

- Common tern *Sterna hirundo*, 267 pairs representing at least 2.2% of the breeding population in Great Britain (5 year peak mean, 1993-1997)

²⁶ Available at: <http://publications.naturalengland.org.uk/publication/4692013588938752> [Accessed on the 15/12/2020]

²⁷ Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9011061.pdf> [Accessed on the 20/12/2023]

- Little tern *Sterna albifrons*, 49 pairs representing at least 2% of the breeding population in Great Britain (5 year peak mean, 1993-1997)
- Mediterranean gull *Larus melanocephalus*, 2 pairs representing 8.2 - 13.9% of the breeding population in Great Britain (5 year peak mean, 1994-1998)
- Roseate tern *Sterna dougallii*, 2 pairs representing at least 3.1% of the breeding population in Great Britain (5 year peak mean, 1993-1997)
- Sandwich tern *Sterna sandvicensis*, 231 pairs representing at least 1.7% of the breeding population in Great Britain (5 year peak mean, 1993-1997)

3.35 This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

Over winter;

- Black-tailed godwit *Limosa limosa islandica*, 1,125 individuals representing at least 1.6% of the wintering Iceland - breeding population (5 year peak mean, 1992/3-1996/7)
- Dark-bellied brent goose *Branta bernicla bernicla*, 7,506 individuals representing at least 2.5% of the wintering Western Siberia/Western Europe population (5 year peak mean, 1992/3-1996/7)
- Ringed plover *Charadrius hiaticula*, 552 individuals representing at least 1.1% of the wintering Europe/Northern Africa - wintering population (5 year peak mean, 1992/3-1996/7)
- Teal *Anas crecca*, 4,400 individuals representing at least 1.1% of the wintering Northwestern Europe population (5 year peak mean, 1992/3-1996/7)

3.36 Assemblage qualification: A wetland of international importance.

The area qualifies under **Article 4.2** of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl

Over winter, the area had a 5 year peak mean of 51,361 birds (1992/92 – 1996/97) including: Gadwall *Anas strepera*, Teal *Anas crecca*, Ringed Plover *Charadrius hiaticula*, Black-tailed Godwit *Limosa limosa islandica*, Little Grebe *Tachybaptus ruficollis*, Great Crested Grebe *Podiceps cristatus*, Cormorant *Phalacrocorax carbo*, Dark-bellied brent Goose *Branta bernicla bernicla*, Wigeon *Anas penelope*, Redshank *Tringa totanus*, Pintail *Anas acuta*, Shoveler *Anas clypeata*, Red-breasted Merganser *Mergus serrator*, Grey Plover *Pluvialis squatarola*, Lapwing *Vanellus vanellus*, Dunlin *Calidris alpina alpina*, Curlew *Numenius arquata*, Shelduck *Tadorna tadorna*.

Ramsar Qualifying Features²⁸

3.37 The Solent and Southampton Water qualify as a Ramsar site under the following criteria:

Criterion 1

The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.

Criterion 2

The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site.

Criterion 5

Assemblages of international importance

²⁸ Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11063.pdf> [Accessed on the 20/12/2023]

Species with peak counts in winter

51,343 waterfowl (5 year peak mean 1998/99 – 2002/03)

Criterion 6 Species / populations occurring at levels of international importance

Qualifying species / populations (as identified at designation):

Species with peak counts in spring / autumn

- Ringed plover *Charadrius hiaticula*, Europe / Northwest Africa: 853 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9 – 2002/3)

Species with peak counts in winter

- Dark-bellied brent goose *Branta bernicla bernicla*: 12,987 individuals, representing an average of 6% of the population (5 year peak mean 1998/9 – 2002/3)
- Eurasian teal *Anas crecca*, NW Europe: 5,514 individuals, representing an average of 1.3% of the population (5 year peak mean 1998/9 – 2002/3)
- Black-tailed godwit *Limosa limosa islandica*, Iceland / W Europe: 1,240 individuals, representing an average of 3.5% of the population (5 year peak mean 1998/9 – 2002/3)

Conservation Objectives²⁹

3.38 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

3.39 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Threats / Pressures to Site Integrity³⁰

3.40 The following threats and pressures to the integrity of the Portsmouth Harbour SPA have been identified in the Natural England Site Improvement Plan:

- Public access / disturbance
- Coastal squeeze
- Fisheries: Commercial marine and estuarine
- Water pollution
- Changes in species distribution
- Climate change
- Change to site conditions
- Invasive species
- Direct land take from development

²⁹ Available at: <http://publications.naturalengland.org.uk/publication/6567218288525312> [Accessed on the 03/11/2020]

³⁰ Available at: <http://publications.naturalengland.org.uk/publication/4692013588938752> [Accessed on the 03/11/2020]

- Biological resource use
- Change in land management
- Inappropriate pest control
- Air pollution: Impact of atmospheric nitrogen deposition
- Hydrological changes
- Extraction: Non-living resources

Solent and Isle of Wight Lagoons SAC

Introduction

- 3.41 The Solent encompasses a series of coastal lagoons, including percolation, isolated and sluiced lagoons. This site includes several lagoons in the marshes near Keyhaven – Pennington, at Farlington Marshes in Chichester Harbour, at Bembridge Harbour and at Gilkicker near Gosport. These lagoons have a range of salinities and substrates, ranging from soft mud to muddy sand with a high proportion of shingle. Farlington Marshes is an isolated lagoon in marsh pasture, which is separated from the sea by a sea wall. It receives sea water only during spring tides. Its fauna is dominated by low-medium salinity insects. The lagoons at Bembridge Harbour lie in a depression behind the sea wall and sea water enters through percolation. Species diversity here is very high, including high densities of *N. vectensis*.
- 3.42 The habitats present in the Solent and Isle of Wight Lagoons SAC support high diversity faunal communities, including the rare foxtail stonewort *Lamprothamnium papulosum*, the scarce lagoon sand shrimp *Gammarus insensibilis* and the scarce starlet sea anemone *Nematostella vectensis*.

Qualifying Features³¹

- 3.43 Annex I habitats that are a primary reason for selection of this site:
- Coastal lagoons

Conservation Objectives³²

- 3.44 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.45 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats
 - The structure and function (including typical species) of qualifying natural habitats, and
 - The supporting processes on which qualifying natural habitats rely

Threats / Pressures to Site Integrity³³

- 3.46 The following threats and pressures to the integrity of the Portsmouth Harbour SPA have been identified in the Natural England Site Improvement Plan:
- Hydrological changes
 - Inappropriate weed control

³¹ Available at: <https://sac.incc.gov.uk/site/UK0017073> [Accessed on the 20/12/2023]

³² Available at: <http://publications.naturalengland.org.uk/publication/5646122018144256> [Accessed on the 03/11/2020]

³³ Available at: <http://publications.naturalengland.org.uk/publication/5670639268528128> [Accessed on the 03/11/2020]

- Coastal squeeze
- Invasive species
- Air pollution: Risk of atmospheric nitrogen deposition

4. Background to Impact Pathways

Introduction

- 4.1 This section sets out the impact pathways that have been identified for consideration in the HRA of the Local Plan based on professional knowledge of the Habitats sites involved, review of the Natural England Site Improvement Plans, review of the Supplementary Advice on the Conservation Objectives for each Habitats site and review of HRAs for surrounding Local Plans.

Recreational Pressure

- 4.2 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and impacts on Habitats protected sites^{34 35}. This applies to any habitat, but recreational pressure from housing growth has particularly strong impacts in Habitats sites designated for their bird interest. Different Habitats sites are subject to different types of recreational pressures and have different vulnerabilities. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents³⁶.
- 4.3 Studies across a range of species have shown that the effects from recreation can be complex. Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. through damaging their habitat or reducing their fitness in less obvious ways e.g. stress). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While these are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death³⁷.
- 4.4 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding³⁸. Disturbance therefore risks increasing energetic expenditure of birds while reducing their energetic intake, which can adversely affect the 'condition' and ultimately survival of the birds. Additionally, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they then must sustain a greater number of birds³⁹. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{40 41}.
- 4.5 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Recreation disturbance in winter can be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, there are often fewer recreational users in the winter months and some effects of disturbance may be reduced because birds are not breeding. Evidence

³⁴ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Footprint Ecology report for Natural England.

³⁵ Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology report for Dorset County Council.

³⁶ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

³⁷ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. *Scottish Natural Heritage*.

³⁸ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* **43**:269-279

³⁹ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* **12**: 67-72

⁴⁰ Clarke R.T., Liley D., Sharp J.M., Green R.E. 2013. Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. doi:10.1371/journal.pone.

⁴¹ Liley D., Clarke R.T. 2003. The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.

in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking⁴². Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁴³. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that should be taken into account in HRAs.

Non-breeding birds (September to March)

- 4.6 Both the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar directly adjoin Portsmouth City. These Habitats sites are designated for overwintering waterfowl and waders, and this section discusses academic research available on these broad groups of birds.
- 4.7 Evans & Warrington found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire and attributed this to observed greater recreational activity on surrounding water bodies at weekends relative to weekdays displacing birds into the LNR. However, in this study, recreational activity was not quantified in detail, nor were individual recreational activities evaluated separately.
- 4.8 Tuite et al⁴⁴ used a large (379 sites), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They determined that the shoveler was one of the most sensitive species to recreational activities, such as sailing, windsurfing and rowing. Studies on recreation in the Solent have established that human leisure activities cause direct disturbance to wintering waterfowl populations^{45 46}.
- 4.9 A study on recreational disturbance on the Humber⁴⁷ assesses different types of noise disturbance on waterfowl referring to previous research relating to aircraft (see Drewitt 1999⁴⁸), traffic (Reijnen, Foppen, & Veenbaas 1997⁴⁹), dogs (Lord, Waas, & Innes 1997⁵⁰; Banks & Bryant 2007⁵¹) and machinery (Delaney et al. 1999; Tempel & Gutierrez 2003). It identifies that there is still relatively little work on the effects of different types of water-based craft and the impacts from jet skis, kite surfers, windsurfers etc (see Kirby et al. 2004 for a review⁵²). In general terms, both distance from the source of disturbance and the scale of the disturbance (noise level, group size) is likely to influence bird responses (Delaney et al. 1999⁵³; Beale & Monaghan 2005⁵⁴). On UK estuaries and coastal sites, a review of WeBS data showed that among the volunteer WeBS surveyors, driving of motor vehicles and shooting were the two activities most perceived to cause disturbance (Robinson & Pollitt 2002⁵⁵).
- 4.10 Disturbing activities present themselves on a continuum. Generally, activities that involve irregular, infrequent and loud noise events, movement or vibration are likely to be most disturbing. For example, the

⁴² Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

⁴³ Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.

⁴⁴ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* **21**: 41-62

⁴⁵ Footprint Ecology. 2010. Recreational Disturbance to Birds on the Humber Estuary.

⁴⁶ Footprint Ecology, Jonathan Cox Associates & Bournemouth University. 2010. Solent Disturbance and Mitigation Project – various reports.

⁴⁷ Fearnley H., Liley D. & Cruickshanks K. (2012) Results of Recreational Visitor Survey across the Humber Estuary. Footprint Ecology.

⁴⁸ Drewitt, A. (1999) Disturbance effects of aircraft on birds. *English Nature Reports*, Peterborough.

⁴⁹ Reijnen, R., Foppen, R. & Veenbaas, G. (1997) Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. *Biodiversity and Conservation* **6**: 567-581.

⁵⁰ Lord, A., Waas, J.R. & Innes, J. (1997) Effects of human activity on the behaviour of northern New Zealand dotterel *Charadrius obscurus aquilonius* chicks. *Biological Conservation* **82**:15-20.

⁵¹ Banks, P.B. & Bryant, J.V. (2007) Four-legged friend or foe? Dog-walking displaces native birds from natural areas. *Biology Letters* **3**: 611-613.

⁵² Kirby, J.S., Clee, C. & Seager, V. (1993) Impact and extent of recreational disturbance to wader roosts on the Dee estuary: some preliminary results. *Wader Study Group Bulletin* **68**: 53-58.

⁵³ Delaney, D.K., Grubb, T.G., Beier, P., Pater, L.L.M. & Reiser, H. (1999) Effects of Helicopter Noise on Mexican Spotted Owls. *The Journal of Wildlife Management* **63**: 60-76.

⁵⁴ Beale, C.M. & Monaghan, P. (2005) Modeling the Effects of Limiting the Number of Visitors on Failure Rates of Seabird Nests. *Conservation Biology* **19**: 2015-2019.

⁵⁵ Robinson, J.A. & Pollitt, M.S. (2002) Sources and extent of human disturbance to waterbirds in the UK: an analysis of Wetland Bird Survey data, 1995/96 to 1998/99: Less than 32% of counters record disturbance at their site, with differences in causes between coastal and inland sites. *Bird Study* **49**: 205.

presence of dogs around water bodies generate substantial disturbance due the type of habitats accessed (e.g. intertidal mudflats and saltmarsh), the area affected and dogs' impacts on bird behaviour. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable and quiet patterns of sound, movement or vibration. The further any activity is from the birds, the less likely it is to result in disturbance. Overall, the factors that determine species responses to disturbance include species sensitivity, timing/duration of the recreational activity and the distance between source and receptor of disturbance.

- 4.11 As part of the Bird Aware Solent Project, a study monitoring bird disturbance across 20 different locations was undertaken between December 2009 and February 2010⁵⁶. This involved recording all recreational activities and relating these to behavioural responses of birds in pre-defined focal areas of intertidal habitat. The study recorded a total of 2,507 potential disturbance events, generating 4,064 species-specific behaviours. Roughly 20% of recorded events resulted in disturbance to waterfowl, including behaviours such as becoming alert, walking / swimming away, short flights (< 50m) or major flights. Generally, the likelihood of disturbance decreased with increasing distance to the disturbance stimulus (i.e. the recreational activity being undertaken). Importantly, the study also illustrated that recreational activities in the intertidal zone have the highest disturbance potential (41% of recorded events resulted in disturbance), followed by water-based activities (25%) and shore-based activities (12%).
- 4.12 The specific distance at which a species takes flight when disturbed is known as the 'tolerance distance' (also called the 'escape distance') and greatly differs between species. The tolerance distances of the study carried out for the Bird Aware project are summarised in Table 1. It is reasonable to assume from this evidence that disturbance is unlikely to be relevant at distances of beyond 300m. The data show that disturbance sensitivity differs between species, but that intra-specific variation is equally important. It was also examined how disturbance to different recreational activities varies between species, but for most species the number of recorded events was insufficient for comparison (except for brent goose, oystercatcher and redshank). Again, there may be inter-specific differences in responses to different types of recreation. For example, brent geese responded to dog walkers much further away than oystercatchers and redshanks.

Table 1: Tolerance distances in metres of 16 species of waterfowl to various forms of recreational disturbance, as found in recent disturbance fieldwork⁵⁷. The distances are provided both as a median and a range.

| Species | Disturbance Distance (metres from stimulus) | | Activity | | | |
|---------------------|---|----------|----------|-------------|---------|---------|
| | Median | Range | Cycling | Dog walking | Jogging | Walking |
| Brent goose | 51.5 | 5 – 178 | 100 | 95 | 30 | 50 |
| Oystercatcher | 46 | 10 – 200 | 150 | 45 | | 50 |
| Redshank | 44.5 | 75 – 150 | 125 | 50 | 40 | 58 |
| Curlew | 75 | 25 – 200 | | | | |
| Turnstone | 50 | 5 – 100 | | | | |
| Coot | 12 | 10 – 20 | | | | |
| Mute swan | 12 | 8 – 50 | | | | |
| Grey plover | 75 | 30 – 125 | | | | |
| Little egret | 75 | 30 – 200 | | | | |
| Wigeon | 75.5 | 20 – 125 | | | | |
| Dunlin | 75 | 25 – 300 | | | | |
| Shelduck | 77.5 | 50 – 140 | | | | |
| Great-crested grebe | 100 | 50 – 100 | | | | |
| Lapwing | 75 | 18 – 125 | | | | |
| Teal | 60 | 35 – 200 | | | | |
| Mallard | 25 | 10 – 50 | | | | |

⁵⁶ Liley D., Stillman R. & Fearnley H. 2011. The Solent Disturbance and Mitigation Project Phase 2: Results of Bird Disturbance Fieldwork 2009/10. Report by Footprint Ecology for the Solent Forum.

⁵⁷ Ibid.

- 4.13 Mitigation measures to avoid recreational pressure effects usually involve a combination of access and habitat management, and the provision of alternative recreational space. Typically, Local Authorities (in their role as Competent Authorities) can set out frameworks for improved habitat and access management, in collaboration with other adjoining Local Planning Authorities. Provision of alternative recreational space can help to attract recreational users away from sensitive Habitats sites and reduce pressure on the sites. However, the location and habitat type of such alternative destinations must be carefully selected to be effective.
- 4.14 Visitor surveys conducted in the Solent in winter 2017 / 2018, indicated that visitors travelled distances between 76m and 300km to visit the Solent, with a mean distance of 8.4km and a median distance of 1.4km. While the region is clearly visited by people from across England, recreational pressure in these Habitats sites is largely driven by local residents. This is reflected in the Interim Solent Recreation Mitigation Strategy (SRMS), which established a Zone of Influence (ZoI) of 5.6km around the SPAs in the Solent, comparable to ZoIs of other Habitats sites such as the Thames Basin Heaths SPA and the Dorset Heathlands SPA. According to the SRMS, all housing developments within this catchment are to provide financial contributions to mitigation interventions designed to protect these sites from adverse effects. This catchment zone is relevant to the Portsmouth Local Plan, as the Plan area directly adjoins the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar.
- 4.15 A follow up survey (Solent SANGs Visitor Survey⁵⁸) was undertaken in the winter of 2021/22 by Footprint Ecology at five inland Suitable Alternative Natural Greenspace (SANG) sites along the Solent (namely: Firestone Copse, Shoreburs Greenway, River Hamble Country Park, Alver Valley Country Park, and Minerva Heights). Post code data indicates that the sites are generally used by people in a relatively local and small catchment with little overlap between them. This suggests that there is potential for further SANGs to “fill in the gaps”. Usage figures appear to be increasing significantly from previous surveys in 2015/16 although an element of caution needs to be applied to the data.

Breeding Birds (April to September)

- 4.16 In addition to their overwintering bird assemblages, the Chichester and Langstone Harbours SPA / Ramsar is also designated for several breeding bird species, including sandwich tern, common tern and little tern. These species are present in the SPA / Ramsar and reproduce in the summer months, meaning that the recreational pressure impact pathway in the Solent is not limited to the overwintering period. Terns are ground-nesting species that form their nest as a shallow scrape on bare ground. They are particularly vulnerable to recreational pressure, including disturbance from dogs, trampling damage, egg theft and vandalism.
- 4.17 Disturbance to birds during the pre-incubation, incubation and chick provisioning stages may lead to the abandonment of potential nesting sites, eggs or chicks, resulting in failure to reproduce or in reduced calorific intake by chicks. If disturbance is pervasive, the failure to produce viable offspring may result in reduced fitness at the population level. Disturbance from dog walkers is a particular threat to ground-nesting birds, which tend to have lower disturbance tolerances because their nests are at higher risk from predators⁵⁹.
- 4.18 This is supported in the literature. For example, a study assessing the breeding success of little tern and least tern found that nest success was significantly higher (82%) in artificial habitats than on natural sandy beaches (58%)⁶⁰. This was primarily due to recreational disturbance on the beaches (which was absent in artificial habitats). Furthermore, even in successful nests, the number of unhatched eggs was twice as high in the natural habitat, most likely due to disturbance leading to the cooling of eggs.
- 4.19 Recreational pressures on the tern colonies in the Solent are well documented and a significant threat to the viability of the species' populations. Generally, all three tern species nest on protected islands (Baker's Island, South Binness Island, Round Nap Island) within the SPA / Ramsar, which are patrolled to reduce the

⁵⁸ Pakanen V-M., Hongell H., Aikio S. & Koivula K. (2014). Little tern breeding success in artificial and natural habitats: Modelling population growth under uncertain vital rates. *Population Ecology* **56**: 581-591.

⁵⁹ [662-Solent-SANGs-Visitor-Survey-report-FINAL.pdf \(birdaware.org\)](#)

⁶⁰ Pakanen V-M., Hongell H., Aikio S. & Koivula K. (2014). Little tern breeding success in artificial and natural habitats: Modelling population growth under uncertain vital rates. *Population Ecology* **56**: 581-591.

impact of human disturbance. South Binness Island and other islands in the lagoon were purchased by the RSPB in 1978, turned into bird sanctuaries and unauthorised access was forbidden.

- 4.20 The terns forage within the shallow coastal waters throughout the harbours and in the wider Solent amidst recreational boats, ships and personal watercraft. Given that the nesting colonies are inaccessible to the general public, the biggest source of recreational pressure is likely to arise from water-based activities, such as boating, jet-skiing, kite-surfing, surfing and sailing.
- 4.21 Footprint Ecology prepared a report in November 2023, reviewing the likelihood of impacts on breeding birds around the Solent from increasing recreational disturbance from new housing. The report considered the impact on five species of breeding birds, namely Mediterranean gull, sandwich tern, common tern, Little tern and roseate tern. All of these bird species are qualifying features of the Solent and Southampton Water SPA. The sandwich tern, common tern and little tern are qualifying features of Chichester and Langstone Harbours SPA.
- 4.22 Mediterranean gulls do not have much specific literature regarding their sensitivity to disturbance. The Footprint Ecology report concludes that they are likely only vulnerable to incursions into their colonies or when water-based activities are done in close proximity to them. Sandwich terns tend to nest in small numbers of large colonies, which can be rapidly abandoned. Common terns breed in smaller scattered colonies. This report concludes that both they are vulnerable to human disturbance, with incursions into colonies and water-based activities in close proximity are key concerns. There is strong evidence for disturbance of little terns impacting distribution and breeding success. Given they nest on open beaches Sandwich terns are the most vulnerable of the species discussed in this report. The roseate tern does not have any regular breeding sites around the Solent but nests with other terns and is so likely similarly vulnerable. It's rarity amplifies this vulnerability.

Conclusion

- 4.23 The available baseline information suggests that the following Habitats Sites are potentially sensitive to recreational pressure, particularly due to the presence of waterfowl and wader species through the year (**the sites in bold are taken forward into the following chapters**):

- **Portsmouth Harbour SPA / Ramsar**
- **Chichester and Langstone Harbours SPA / Ramsar**
- **Solent and Southampton Water SPA / Ramsar**
- **Solent and Dorset Coast SPA**

Loss of Functionally Linked Habitat

- 4.24 While most Habitats sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not necessarily the case. A diverse array of qualifying species including birds, bats and amphibians are not always confined to the boundary of designated sites.
- 4.25 For example, the highly mobile nature of both wader and waterfowl species implies that areas of habitat of crucial importance to the integrity of their populations lie outside the physical limits of Habitats sites. Despite not being part of the formal designation, these habitats are integral to the maintenance of the structure and function of the designated site, for example by encompassing important foraging grounds. Therefore, land use plans that may affect such functionally linked habitat require further assessment.
- 4.26 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England recognised the potential importance of functionally linked land⁶¹. For example, bird surveys in relation to a previous HRA established that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were affected while on functionally linked land, and this required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA / Ramsar, where adjacently located functionally linked land had a peak survey

⁶¹ Chapman C & Tyldesley D. 2016. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – A review of authoritative decisions. *Natural England Commissioned Reports 207*. 73pp

count of 108% of the 5 year mean peak population of golden plover. This finding led to considerable amendments in the planning proposal to ensure that the site integrity was not adversely affected.

- 4.27 Generally, the identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and thus might require the analysis of existing data sources (e.g. Bird Atlases or data from records centres) to be firmly established. In some instances, data may not be available at all, requiring further survey work.
- 4.28 The Solent Waders and Brent Goose Strategy (SWBGS)⁶², a conservation partnership project focusing particularly on brent geese and wading birds in the Solent, has undertaken surveys over three winters between 2016 and 2019. The strategy is an attempt to identify the sites these birds rely on in the Solent, outside the boundaries of the formally designated sites. This network of functionally linked feeding and roosting sites has been mapped, identifying Core Areas, Primary Support Areas, Secondary Support Areas, Low Use areas and Candidate sites. For example, one of the key parcels of functionally linked habitat within Portsmouth City is Southsea Common (P35), a Core feeding Area for brent geese. This HRA assesses the likelihood of all development sites to constitute functionally linked habitat, based on some key parameters including site area, habitat type, proximity to Habitats sites and the nature of flightlines from / to designated sites. It will consult the SWBGS to identify the main parcels of functionally linked habitat in relation to the emerging PLP.
- 4.29 Overall, the available baseline information suggests that the following Habitats Sites are sensitive to the loss of functionally linked habitats due to the presence of mobile waterfowl (**the sites in bold are taken forward into the following chapters**):
- **Portsmouth Harbour SPA / Ramsar**
 - **Chichester and Langstone Harbours SPA / Ramsar**
 - **Solent and Southampton Water SPA / Ramsar**
- 4.30 Solent and Dorset Coast is an open water site designated for foraging terns. Therefore, the SPA is not at risk of likely significant effects due to loss of functionally linked habitat to construction from Local Plan.

Recreational Pressure in Functionally Linked Habitat

- 4.31 Recreational pressure can also impact the usage of functionally linked habitats by qualifying SPA / Ramsar waterfowl and waders. As highlighted in the previous section, the integrity of Solent's Habitats sites depends on a network of functionally linked supporting habitats. Birds using such land parcels outside designated site boundaries are also sensitive to recreational usage of the site.
- 4.32 Assessments of recreational impacts on functionally linked habitats are less straightforward than for Habitats sites. This is because there typically is no visitor data available for such sites and therefore it is difficult to establish a baseline of site usage. Functionally linked habitats are unlikely to have the same draw on recreational users than the higher-profile designated sites, because they are often relatively small greenfield sites (e.g. short grassland or agricultural land). However, other functionally linked habitats (e.g. Southsea Common along Portsmouth City's waterfront) may experience high levels of usage, owing to their nature and location adjacent to sites with a strong recreational draw (the coastline in this instance).
- 4.33 The distance to allocations proposed in development plans is likely to be a key predictor of site usage, with functionally linked habitats typically only considered to be a recreation destination if within 1km from new residential development. However, a site-by-site assessment is important, due to the different types of supporting habitats.
- 4.34 The following Habitats Sites are sensitive to recreational pressure in functionally linked habitats from Portsmouth City due to the presence of mobile waterfowl (**the sites in bold are taken forward into the following chapters**):
- **Portsmouth Harbour SPA / Ramsar**

⁶² Solent Waders and Brent Goose Strategy Steering Group. November 2020. Solent Waders and Brent Goose Strategy. 37pp. Available at: <https://solentwbgs.wordpress.com/page-2/> [Accessed on the 14/12/2023]

- **Chichester and Langstone Harbours SPA / Ramsar**
- **Solent and Southampton Water SPA / Ramsar**

4.35 This impact pathway is not considered a risk to Solent and Dorset Coast SPA for the reasons already given for recreational pressure and loss of functionally-linked land.

Disturbance from Construction (in Habitats Sites and Functionally Linked Habitat)

- 4.36 Development schemes can result in the disturbance of qualifying SPA / Ramsar bird species in Habitats sites or functionally linked habitats through several mechanisms. Noise and visual disturbance arising from construction activities may result in behavioural changes (e.g. flight from the nest, cessation of foraging) in birds. Furthermore, post-construction disturbance from site usage, road traffic and operational lighting might also arise. Three of the most important factors determining the magnitude of disturbance appear to be species sensitivity, proximity of the disturbance source and timing / duration of the disturbance.
- 4.37 An increasing amount of research on visual and noise disturbance of waterfowl from construction (and other activities) is now available. Both visual and noise stimuli may elicit disturbance responses, potentially affecting the fitness and survival of waterfowl and waders. Noise is a complex disturbance parameter requiring the consideration of multiple parameters, including the fact that it is not described on a linear scale, its nonadditive effect and the source-receptor distance. A high level of noise disturbance constitutes a sudden noise event of over 60dB or prolonged noise of over 72dB. Bird responses to high noise levels include major flight or the cessation of feeding, both of which might affect the survival of birds if other stressors are present (e.g. cold weather, food scarcity).
- 4.38 Generally, research has shown that above noise levels of 84dB waterfowl show a flight response, while at levels below 55dB there is no effect on their behaviour⁶³. These two thresholds are therefore considered useful as defining two extremes. The same authors have shown that regular noise levels should be below 70dB at the bird, as birds will habituate to noise levels below this level⁶⁴. Generally, noise is attenuated by 6dB with every doubling of distance from the source. Impact piling, the noisiest construction process of approx. 110 dB at 0.67m from source, will therefore reduce to 67-68dB by 100m away from the source. The loudest construction noise should therefore have fallen to below disturbing levels by 100m, and certainly by 200m, away from the source even without mitigation.
- 4.39 Visual disturbance is generally considered to have a higher impact than noise disturbance as, in most instances, visual stimuli will elicit a disturbance response at much greater distances than noise⁶⁵. For example, a flight response is triggered in most species when they are approached to within 150m across a mudflat. Visual disturbance can be exacerbated by workers operating equipment outside machinery, undertaking sudden movements and using large machinery. Several species are particularly sensitive to visual disturbance⁶⁶, including curlew (taking flight at 275m), redshank (at 250m), shelduck (at 199m) and bar-tailed godwit (at 163m), all of which are qualifying species of the Portsmouth SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar. Overall, specific regard should be given to assemblage composition when identifying threshold levels for both visual and noise disturbance.
- 4.40 Disturbance can also result post-construction, although substantial changes in traffic flow are generally needed for significant noise disturbance to arise from roads. For example, a 25% increase in road traffic (e.g. through a road scheme) will result in only a 1dB(A) increase at the roadside, with a 100% increase needed to result in a 3dB(A) increase – the lowest increase in noise that is thought to be even perceivable by humans and birds. In contrast, the introduction of operational lighting of schemes into areas that are not currently lit can result in disturbance of animal species within Habitats sites or those that rely on functionally linked habitats. At the same time, it must be noted that the Portsmouth area is already generally a brightly lit urban frontage.

⁶³ Cutts N & Allan J. 1999. Avifaunal Disturbance Assessment. Flood Defence Works: Saltend. Report to Environment Agency).

⁶⁴ Cutts, N., Phelps, A. and Burdon, D. (2009) Construction and waterfowl: Defining Sensitivity, Response, Impacts and Guidance. Report to Humber INCA, Institute of Estuarine and Coastal Studies, University of Hull.

⁶⁵ Research undertaken by the Institute of Estuarine & Coastal Studies, University of Hull. 2013. Available at: http://bailey_persona-pi.com/Public-Inquiries/M4%20-%20Revised/11.3.67.pdf [Accessed on the 28/10/2020]

⁶⁶ Ibid. Response distances to visual stimuli are given in the Estuarine & Coastal Studies report.

4.41 The following Habitats sites within 10km of Portsmouth City are sensitive to visual and noise disturbance in both the sites themselves and functionally linked habitats as a result of Local Plan development, both during and post construction (**the sites in bold are taken forward into the following chapters**):

- **Portsmouth Harbour SPA / Ramsar**
- **Chichester and Langstone Harbours SPA / Ramsar**
- **Solent and Southampton Water SPA**

4.42 Since they are on the wing and foraging over a large area predominantly in the marine environment, foraging terns for which Solent and Dorset Coast SPA is designated are not considered to be at significant risk of disruption of foraging from onshore construction works.

Water Quality

4.43 The quality of the water that feeds Habitats sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of water with nutrients, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing bioavailable nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.44 The most notable issue in relation to the PLP is the discharge of treated sewage effluent, which is likely to increase the concentration of nutrients in Habitats sites that are dependent on the input of high-quality water. In marine Habitats sites (e.g. the Portsmouth Harbour and the Chichester and Langstone Harbours SPA / Ramsar) nitrogen is the main limiting nutrient and an increase in nutrients may cause eutrophication. Given that Portsmouth City (and the WwTW serving it) lie on the coast, there is little time for natural attenuation before these nutrients reach the respective marine sites.

4.45 Site condition assessments undertaken by Natural England in 2018 and 2019, have identified a strategic issue of nitrogen pollution in the wider Solent area. High concentrations of nitrogen (and phosphorus) are being input to these Habitats sites, primarily from agriculture sources and treated wastewater effluent. There is a high degree of certainty that nitrogen is causing eutrophication (leading to the growth of dense algal mats) and affecting the qualifying species of the Solent's Habitats sites. For example, 81% of the component SSSIs are currently in unfavourable condition. As a result, Natural England advises that new residential development in hydrological connectivity with the Solent must achieve nitrogen neutrality⁶⁷, or, if neutrality cannot be achieved, provide adequate mitigation measures.

4.46 In January 2024, the Solent was formally designated a sensitive catchment area to nitrogen under s96C of the Water Industry Act 1991. Given that both SPA's / Ramsar's adjoin Portsmouth City, impacts of surface water runoff from hardstanding on the marine water quality also need consideration. Water from overflowing sewage systems and from industrial leakages and / or spillages may contribute to the overall nutrient loading in the marine environment.

4.47 The Local Plan assessed in this HRA provides for development in the geographic area covered by Southern Water, responsible for the public water supply and wastewater treatment within Portsmouth City and the

⁶⁷ Natural England. (June 2020). Advice on Achieving Nutrient Neutrality for new Development in the Solent Region. Version 5. 56pp.

wider area surrounding it. The potential HRA implications of sewage discharge for Habitats sites associated with residential and industrial development are outlined in Table 2.

Table 2: Wastewater Treatment Works serving Portsmouth City, the potential growth accommodated and its HRA implications.

| WwTW Catchment | Development quanta allocated in the Portsmouth Local Plan | HRA implications |
|--|--|---|
| Portsmouth and Havant WwTW (operated by Southern Water and Portsmouth Water) | 13,603 residential dwellings and at least 138,429m ² of employment floorspace | Discharge of treated sewage effluent and industrial pollutants directly into Solent's Habitats sites or into local freshwater bodies (ultimately entering the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA/ Ramsar and the Solent Maritime SAC) |

4.48 The available baseline information suggests that the following Habitats Sites are vulnerable to a decline in water quality (**the sites in bold are taken forward into the following chapters**):

- **Portsmouth Harbour SPA / Ramsar**
- **Chichester and Langstone Harbours SPA / Ramsar**
- **Solent and Southampton Water SPA**
- **Solent and Dorset Coast SPA**
- **Solent Maritime SAC**
- Solent and Isle of Wight Lagoons SAC

4.49 There is no direct hydrological connectivity between the Solent and Isle of Wight Lagoons SAC and the marine environment, except through percolation. Therefore, this site is screened out from further assessment relating to the impact pathway water quality.

Water Quantity, Level and Flow

4.50 The water level, its flow rates and the mixing conditions are important determinants of the condition of Habitats sites and their qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands and coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity and water temperature. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition. Changes to the water flow rate within an estuary can be associated with a multitude of further impact pathways, including substratum loss, smothering and changes in wave exposure, and often interact with coastal squeeze.

4.51 The unique nature of wetlands combines shallow water and conditions that are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians. Overwintering, migrating and breeding wetland bird species are particularly reliant on these food sources, as they need to build up enough nutritional reserves to sustain their long migration routes or feed their hatched chicks.

4.52 Coastal habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of freshwater is fundamental to maintaining the ecological integrity of coastal marine areas. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. In extreme cases, this might lead to the loss of the structure and functioning of marine ecosystems. There are two mechanisms through which urban development might negatively affect freshwater supply to Habitats Sites:

- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may decrease freshwater input to Habitats sites sharing the same catchment.

- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. This can contribute to so-called flash floods and increased water flow into Habitats sites. Some of the knock-on impacts of surface water runoff include increases in sedimentation, turbidity and anthropogenic pollutants.
- 4.53 Water abstraction for the potable water supply is of particular concern in areas with little rainfall (and limited recharge potential) or where water resources are already depleted. In 2013 the Environment Agency published a map of water-stressed areas, highlighting that the south-east of England is generally identified as an area of high water stress (see Figure 3 below). This is due to its large population, high water demand and the lower annual rainfall in this area of England.

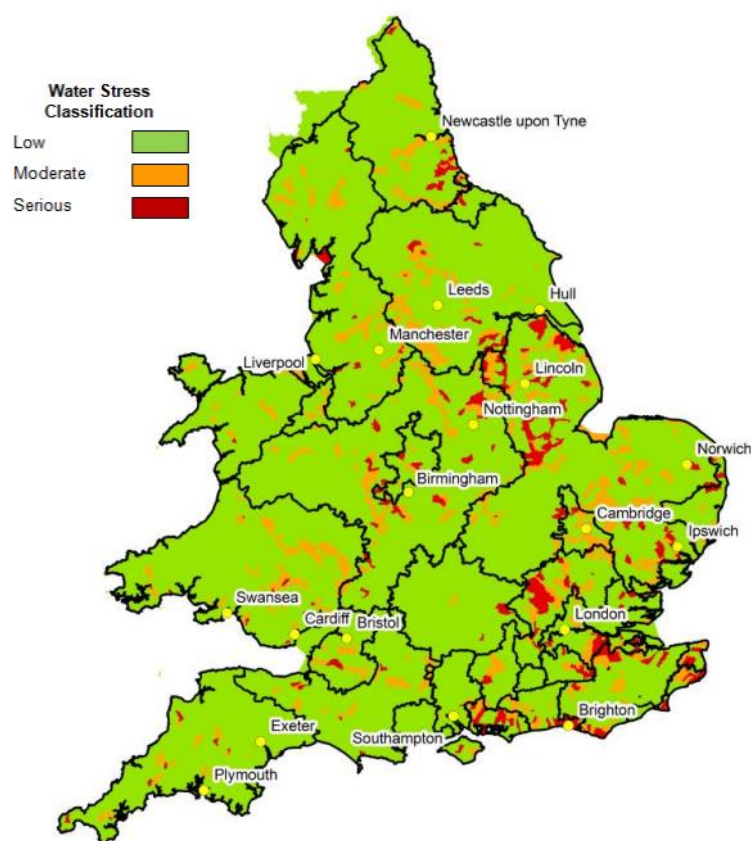


Figure 3: Areas of water stress within England.

- 4.54 Portsmouth City lies adjacent to several coastal Habitats sites, all of which are sensitive to changes in hydrological regime. Specifically, the Site Improvement Plan for the Solent⁶⁸ (encompassing the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC) identifies hydrological changes as a threat to the qualifying features of these sites. It states that 'Titchfield Haven has a high level of water abstraction licenses – if all were used then water levels would be too low in the SAC / SPA'.
- 4.55 The water supply in Portsmouth City is provided by Portsmouth Water and South-East Water (supplying a small area in the north of the city). The further assessment stages of this impact pathway will involve an appraisal of the Water Resources Management Plans (WRMPs) of the two companies, taking account of existing licensed abstractions and the supply-demand balances over the WRMPs.
- 4.56 Overall, the following Habitats sites within 10km of Portsmouth City are sensitive to changes in their water quantity, level and flow as a result of urban development (**the sites in bold are taken forward into the following chapters**):

⁶⁸ The Site Improvement Plan for the Solent is published by Natural England and available at: <http://publications.naturalengland.org.uk/file/5319610920337408> [Accessed on the 28/10/2020]

- **Portsmouth Harbour SPA / Ramsar**
- **Solent and Dorset Coast SPA**
- **Chichester and Langstone Harbours SPA / Ramsar**
- **Solent and Southampton Water SPA**
- **Solent Maritime SAC**
- **Solent and Isle of Wight Lagoons SAC**

Atmospheric Pollution

4.57 The main pollutants of concern for Habitats sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂; see Table 3). Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges⁶⁹. NO_x can also be toxic at very high concentrations (far above the annual average critical level). However, in particular, high levels of NO_x and NH₃ are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in recipient ecosystems. An increase in nitrogen deposition from the atmosphere is widely known to enhance soil fertility and to lead to eutrophication. This often has adverse effects on plant community composition and the overall quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{70,71}.

Table 3: Main sources and effects of air pollutants on habitats and species⁷².

| Pollutant | Source | Effects on habitats and species |
|------------------------------------|--|--|
| Sulphur Dioxide (SO ₂) | <p>The main sources of SO₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980's.</p> <p>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO₂ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO₂ emissions in the UK.</p> | <p>Wet and dry deposition of SO₂ acidifies soils and freshwater and may alter the composition of plant and animal communities.</p> <p>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.</p> <p>However, SO₂ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.</p> |
| Acid deposition | <p>Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.</p> <p>Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.</p> | <p>Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying</p> |

⁶⁹ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

⁷⁰ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. 2006. Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176

⁷¹ Dijk, N. 2011. Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607

⁷² Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

| | | |
|------------------------------------|---|---|
| | | geology of granite, gneiss and quartz rich rocks tend to be more susceptible. |
| Ammonia (NH ₃) | <p>Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. At a very local level some traffic can also make a notable contribution.</p> <p>Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).</p> <p>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.</p> | <p>The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation.</p> <p>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.</p> |
| Nitrogen oxides (NO _x) | <p>Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.</p> <p>Nitrogen oxides have been consistently falling for decades due to a combination of coal fired power station closures, abatement of other combustion point sources and improved vehicle emissions technology. They are expected to continue to fall over the plan period.</p> | <p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 ug/m³.</p> <p>Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.</p> <p>In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.</p> |
| Nitrogen deposition | <p>The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_x) or reduced (e.g. NH₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.</p> <p>The N pollutants together are a large contributor to acidification (see above).</p> | <p>All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.</p> <p>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species.</p> <p>N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p> |
| Ozone (O ₃) | <p>A secondary pollutant generated by photochemical reactions involving NO_x, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).</p> <p>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is</p> | <p>Concentrations of O₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.</p> <p>High O₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.</p> |

| | | |
|--|---|--|
| | believed to require action at international level to reduce levels of the precursors that form ozone. | |
|--|---|--|

- 4.58 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁷³. Ammonia emissions mainly originate from agricultural practices⁷⁴, with some chemical processes and vehicle exhaust emissions also making notable contributions. As such, it is unlikely that material increases in SO₂ emissions will be associated with the PLP but increases in NO_x and NH₃ probably would at a local level.
- 4.59 NO_x emissions in particular are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NO_x footprint (92%) through its associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁷⁵. The emerging PLP, which allocates 13,603 net new dwellings in Portsmouth City, can therefore be reasonably expected to increase emissions of NO_x through an increase in vehicular traffic.
- 4.60 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'critical loads'⁷⁶ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃). The critical level for ammonia is 3 µgm⁻³, or 1 µgm⁻³ where lower plants are of particular relevance.
- 4.61 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is insignificant (Figure 4 and see reference ⁷⁷). This is therefore the distance that has been used throughout this HRA to identify major commuter routes along Habitats Sites, which are likely to be significantly affected by an increase in commuter traffic.

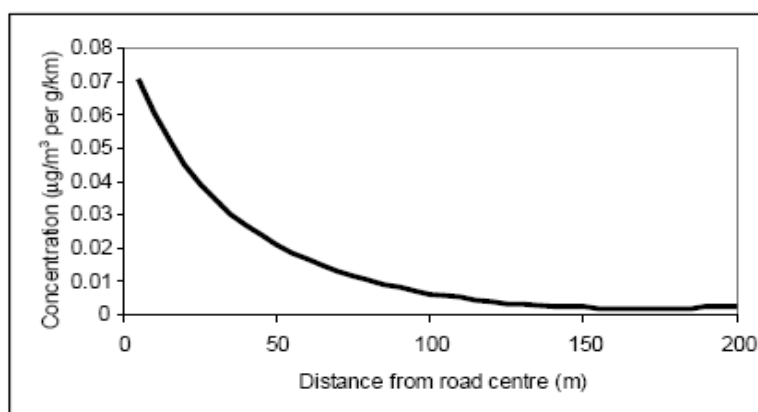


Figure 4: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁷⁸)

- 4.62 The following Habitats sites within 10km of Portsmouth City are sensitive to atmospheric pollution arising from the Local Plan development, such as through an increase in the number of two-way vehicle trips within 200m of these sites (**the sites in bold are taken forward into the following chapters**):

- **Portsmouth Harbour SPA / Ramsar**
- **Chichester and Langstone Harbours SPA / Ramsar**
- **Solent and Southampton Water SPA**

⁷³ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁷⁴ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313

⁷⁵ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

⁷⁶ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

⁷⁷ See: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 03/11/2020].

⁷⁸ Available at: <http://www.dft.gov.uk/ha/standards/dmr/vol11/section3/ha20707.pdf> [Accessed on the 03/11/2020].

- **Solent Maritime SAC**
 - **Solent and Isle of Wight Lagoons SAC**
- 4.63 The Solent and Dorset Coast SPA is c.890 km² in area, much of which is open sea. The plunge diving tern species for which it is designated are not specialised feeders and unlike waterfowl and waders are not heavily dependent on intertidal habitats vulnerable to atmospheric nitrogen deposition. Therefore, LSEs of the emerging PLP on this site can be excluded and it is screened out of Appropriate Assessment.

Impacts of Tall Buildings on Flight Lines and Sight Lines

- 4.64 Tall, manmade structures have various potential ecological impacts, particularly on bird species. It is now well known that such structures can interfere with the commuting or migration routes of birds. Furthermore, tall buildings are also a physical obstacle, representing a direct risk of collision mortality.
- 4.65 The magnitude of a potential disturbance effect of such infrastructure is determined by several design parameters (e.g. building height, number of windows, level of illumination) and its location relative to roosting and foraging habitats. For example, the constant illumination of some buildings such as hotels is thought to lead to an entrapment effect, preventing birds from successfully completing their commuting / migratory routes. Tall structures are likely to have much higher impacts if they are positioned in established commuting or migratory corridors. This might prevent the birds' ability to use established feeding territories beyond newly built structures or alter the amount of energy required to get there.
- 4.66 Local Plans typically do not provide sufficient detail regarding the design of buildings, such it is often not possible to investigate this impact pathway at the plan level. A more thorough assessment on the impact of tall buildings was undertaken in the HRA of the Portsmouth Seafront Masterplan, which forms part of the overall development plan in Portsmouth City.
- 4.67 The PLP provides for a both employment and residential developments that could be sufficiently tall to affect bird sight lines and flight lines. This HRA will set the development proposals into ecological context (where sufficient details on their design are available), to identify whether they might represent a threat to the ranging or commuting behaviour of SPA / Ramsar birds.
- 4.68 The available baseline information suggests that the following Habitats sites are sensitive to the effects of tall buildings on flightlines due to their qualifying species (**the sites in bold are taken forward into the following chapters of the HRA**):
- **Portsmouth Harbour SPA / Ramsar**
 - **Chichester and Langstone Harbours SPA / Ramsar**
 - Solent and Southampton Water SPA / Ramsar
 - Solent & Dorset Coast SPA
- 4.69 The closest section of the Solent and Southampton Water SPA / Ramsar, i.e. the part to the south across a small section of sea, is 4.5km from the closest point in Portsmouth City. Given this distance, it is more likely that brent geese from the SPA / Ramsar will be using functionally linked habitats on the Isle of Wight. Any geese using habitat parcels in the Portsmouth City area, are unlikely to be impacted by the PLP as emerging development is unlikely to lie in their flight trajectory. Therefore, the Solent and Southampton Water SPA / Ramsar is screened out from further assessment in relation to this impact pathway. The tern species for which Solent and Dorset Coast SPA is designated plunge-dive in open water habitats as part of their foraging behaviour and make no use of terrestrial habitat except when visiting their nesting colonies which are all immediately on the coast. Therefore, potential for impacts of the emerging PLP on the Solent & Southampton Water SPA / Ramsar and Solent & Dorset Coast SPA can be excluded.

Coastal Squeeze

- 4.70 Coastal squeeze⁷⁹ is a term that originates from coastal management, whereby intertidal habitats used by SPA / Ramsar birds are lost as the sea level rises and inland brownfield development (e.g. a sea wall or an industrial complex) prevents the inland migration of habitats (e.g. saltmarsh) and its associated species. As a result, the habitat is 'squeezed' and reduces in size. This is a significant process, particularly in geographic areas that are highly urbanised or that are rapidly transitioning from an undeveloped to developed state.
- 4.71 Additionally, as development frequently takes place immediately inland from the sea wall, flood defences generally cannot be moved landwards to accommodate managed retreat of threatened habitats. This may result in gradually reducing areas of saltmarsh and mudflat habitats adjacent to built-up areas. In areas where sediment availability is low, the coastal squeeze also includes an increasingly steep beach profile and foreshortening of the seaward zones.
- 4.72 The Chichester and Langstone Harbours have the North Solent Shoreline Management Plan⁸⁰ (NSSMP) in place and this indicates that there will be a combination of 'Hold the Line', 'Managed Realignment' and 'Adaptive Management' strategies. An HRA of the draft plan indicated that Hold the Line will have no effect on habitats behind the defences, whilst Managed Realignment would likely "*have a significant detrimental effect resulting in loss of designated terrestrial habitats including coastal grazing marsh, saline lagoons and grasslands.*" Managed Realignment is proposed in the short term for part of Chichester Harbour. Although Hold the Line is the preferred approach for most of the shoreline, the plan notes that further studies along the Chichester and Langstone Harbours may result in a revision of the NSSMP for significant lengths of shoreline in the inner harbours.
- 4.73 In order to conclude that development allocated in the PLP would not result in LSEs regarding coastal squeeze, the Local Plan should not require NSSMP (or the resulting Coastal Strategy) policies for the frontage to be altered. Development would not be situated in locations that require new defences in currently undefended parts of the coastline or in areas allocated for managed realignment (i.e. adjustments to coastal flood defences). To assess this impact pathway, residential and employment sites allocated in the PLP will be assessed as to their relative distance to coastal habitats, whether they are on greenfield sites (very few are present in the urban fabric of Portsmouth) and if they lie within sections of the coast identified for managed realignment.
- 4.74 The following Habitats sites within 10km of Portsmouth City are sensitive to coastal squeeze and the loss of habitat as a result of Local Plan development (**the sites in bold are taken forward into the following chapters**):
- **Portsmouth Harbour SPA / Ramsar**
 - **Chichester and Langstone Harbours SPA / Ramsar**
 - **Solent and Southampton Water SPA**
 - **Solent and Dorset Coast SPA**

Permanent Habitat Loss in the Portsmouth Harbour SPA / Ramsar

- 4.75 The purpose of the Conservation of Habitats and Species Regulations 2017 (as amended) is to protect Habitats Sites in England and Wales, including some of the country's most important habitats and species. Any plans or projects that would result in adverse effects on a designated site (either alone or in combination) that cannot be adequately mitigated or avoided, cannot be advanced through Local Plans or by way of planning consent unless further tests can be met. By definition, any permanent irreversible habitat loss from a designated site, above a nugatory scale, is likely to have adverse effect on integrity, as in the case of SPAs / Ramsars, this will result in the loss of foraging and / or roosting ground for birds.

⁷⁹ For a comprehensive review of coastal squeeze please see: Doody J.P. (2013). Coastal squeeze and managed realignment in southeast England, does it tell us anything about the future? *Ocean & Coastal Management* **79**: 34-41.

⁸⁰ New Forest District Council. (December 2010). North Solent Shoreline Management Plan – including Chichester, Langstone and Portsmouth Harbours & Southampton Water. Available at: <http://www.northsolentsmp.co.uk/article/10025> [Accessed on the 03/11/2020].

- 4.76 Various developments can result in the loss of habitat in Habitats Sites, either temporary or permanent. Temporary habitat loss (e.g. such as resulting from the excavation of spoil for entrenching of piping) is reversible and there is a potential for deploying mitigation measures to avoid adverse effects on site integrity. In contrast, the permanent loss of foraging habitat might reduce the carrying capacity of a site, as a result of lower prey abundance and increased competition for resources.
- 4.77 Plans or projects that result in the loss of land from an SPA / Ramsar must meet the derogations tests described in Chapter 2 above.
- 4.78 All Habitats sites within 10km of Portsmouth City are sensitive to direct permanent habitat loss. Review of the emerging PLP indicates that one proposed site allocation will result in direct habitat loss, namely the Tipner West & Horsea Island East Strategic Site. **(the Habitats sites in bold are taken forward into the following chapters):**
- **Portsmouth Harbour SPA / Ramsar**
 - **Solent & Dorset Coast SPA**

5. Test of Likely Significant Effects (LSEs)

Introduction

- 5.1 This stage of the HRA assesses all policies in the emerging PLP for impact pathways linking to Habitats sites. The screening assessments of all policies contained in the plan are also provided in Appendix B.

Recreational Pressure

Solent and Dorset Coast SPA

- 5.2 Solent and Dorset Coast is an open water site designated for foraging terns. In general foraging terns, which forage over a large area. Of the five species of tern which regularly breed in Great Britain, little tern has the most limited foraging range from its nest colonies, but even for this species the mean range is 2.1km⁸¹. Foraging (plunge diving) terns spend relatively little time in a specific location and are thus much less susceptible to recreational disturbance than nesting terns which are in a fixed location. Moreover, while they forage across the intertidal zone they do so when the tide is high (and thus recreational use of the foreshore is low to negligible) as they are plunge-diving birds. It is considered that the SPA is not at risk of likely significant effects due to recreational pressure from Local Plan growth, although measures implemented to protect other Habitats sites (such as Portsmouth Harbour SPA/Ramsar) would also convey protection to the intertidal parts Solent and Dorset Coast SPA.

Portsmouth Harbour SPA / Ramsar

- 5.3 Portsmouth Harbour SPA / Ramsar is designated for four overwintering species of waterfowl and waders: dark-bellied brent goose, dunlin and black-tailed godwit, while the Ramsar site is also designated for the intertidal mudflat and saline lagoons including eelgrass beds. It adjoins Portsea Island on its north-western side around Tipner and Horsea. The qualifying species of the SPA / Ramsar are sensitive to recreational pressure, especially because such disturbance is likely to reduce the time spent foraging and to increase energy expenditure (such as by taking flight). This is a particular threat for overwintering species, which critically depend on building up their nutritional reserves before migrating back to their breeding grounds. Natural England's Site Improvement Plan (SIP) and the Supplementary Advice on the Conservation Objectives identify public access and disturbance as the primary threat to the integrity of the site, with various research projects and mitigation measures to be progressed in the Solent. Considering that the PLP allocates 13,603 dwellings, that Portsmouth city is situated immediately east and north-east of the SPA/Ramsar, and that the PLP also promotes tourism opportunities in the plan period, it is considered that LSEs on the Portsmouth Harbour SPA / Ramsar cannot be excluded.

Chichester and Langstone Harbours SPA / Ramsar

- 5.4 The Chichester and Langstone Harbours SPA / Ramsar is designated for its assemblage of overwintering and breeding birds. This includes waterfowl (e.g. shelduck, wigeon, dark-bellied brent goose), waders (e.g. redshank, curlew, bar-tailed godwit) and seabirds (e.g. sandwich, common and little tern). This SPA / Ramsar adjoins Portsea Island on its eastern side, stretching into Chichester District. The recreational pressures on overwintering birds are similar to those discussed in relation to the Portsmouth Harbour SPA / Ramsar and Natural England's SIP for the Solent and Supplementary Advice on Conservation Objectives also covers this site. One marked difference to the Portsmouth Harbour SPA / Ramsar is that this site is also partly designated for breeding terns, meaning that recreational disturbance is a year-round issue in the Chichester and Langstone Harbours SPA / Ramsar. Crucially, recreational disturbance might reduce the breeding success of the ground-nesting terns, due to the cooling of eggs, reduced chick food provisioning, direct trampling damage or vandalism. Considering that the PLP allocates 13,603 dwellings, that Portsmouth

⁸¹ Natural England. 2016. Solent and Dorset Coast Departmental Brief. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/560622/solent-dorset-departmental-brief.pdf

City is located immediately west and north-west of Langstone Harbour, and that the PLP also promotes tourism opportunities in the plan period, it is considered that LSEs on the Chichester and Langstone Harbours SPA / Ramsar cannot be excluded.

Solent & Southampton Water SPA / Ramsar

- 5.5 The Solent & Southampton Water SPA / Ramsar is designated for an assemblage of overwintering and breeding birds. The qualifying species include dark-bellied brent goose, black-tailed godwit and four breeding tern species (sandwich, common, little and roseate tern). As in the Chichester & Langstone Harbours SPA & Ramsar, recreational pressure is therefore a threat across all seasons, potentially affecting the overwinter foraging and the breeding success of SPA / Ramsar species. The Solent & Southampton Water SPA / Ramsar lies approx. 3.4km to the west of Portsmouth City (considerably more distant than the two Habitats sites discussed earlier in this section), and likely to be somewhat less impacted by recreational pressure from Portsmouth City residents. It is well documented that the likelihood of recreational site use reduces with distance from home.
- 5.6 Notwithstanding this, the SPA / Ramsar lies within the core recreational catchment (CRC) identified for the Solent Habitats sites (5.6km as identified by the work in the Bird Aware Solent project). Considering that the PLP allocates 13,603 dwellings and promotes tourism opportunities in the plan period, it is considered that LSEs on the Solent & Southampton Water SPA / Ramsar cannot be excluded.

Solent Maritime SAC

- 5.7 The Solent Maritime SAC is designated for a range of habitats, plant communities and the Desmoulin's whorl snail. These qualifying features are important in their own right and many (e.g. the Atlantic salt meadows and mudflats) provide critical support to bird features of the overlapping Chichester & Langstone Harbours SPA / Ramsar. Most qualifying habitats are sensitive to the abrasion and reworking of sediment on or below the surface of the seabed, which may result in significant changes to local levels of oxygenation and turbidity, as well as dislodging / destroying plant assemblages. Such impacts may result from a variety of recreational activity (e.g. dog walking, horse riding, swimming), but are most likely to result from off-roading or the mooring and anchoring associated with water-based craft, including powerboating and sailing. Natural England's SIP indicates that more research is needed regarding the effect of recreation on the annual vegetation of drift lines and the perennial vegetation of stony banks. Considering that the PLP allocates 13,603 dwellings and promotes tourism opportunities in the plan period, it is considered that LSEs on the Solent Maritime SAC cannot be excluded, given its position immediately east of the City of Portsmouth.

Screening of Policies – Recreational Pressure

- 5.8 The Portsmouth Harbour SPA / Ramsar, the Chichester & Langstone Harbours SPA / Ramsar, the Solent & Southampton Water SPA / Ramsar and the Solent Maritime SAC are all sensitive to the impacts of recreational pressure. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.
- 5.9 The following policies in the PLP are screened in for Appropriate Assessment in relation to the impact pathway recreational pressure because they allocate new residential growth or encompass projects that are likely to increase the overall footfall in the Portsmouth City area:
- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
 - Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
 - Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net).
 - Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities.

- Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
- Policy PLP11: Port Solent – Allocates 500 dwellings
- Policy PLP12: St John's College – Allocates 212 dwellings
- Policy PLP13: Fraser Range – Allocates 134 dwellings
- Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
- Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net)
- Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
- Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
- Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Loss of Functionally Linked Habitat

Portsmouth Harbour SPA / Ramsar

5.10 Portsmouth Harbour SPA / Ramsar is designated for mobile waterfowl and wader species, which routinely roost and / or forage beyond the designated site boundary. For example, dark-bellied brent geese feed in different habitats depending on the state of the tide. At low tide, they feed on seagrass beds in the harbour, especially at Paulsgrove Lake, Portchester, and Forton Lake. Most low-tide foraging sites are included within the SPA / Ramsar designation. In contrast, at high tide the geese feed on grassland and wheat fields near the harbour, many of which lie outside the SPA / Ramsar boundary but are functionally linked habitat due to their critical importance in providing feeding grounds. Similarly, black-tailed godwits are not limited exclusively to foraging in the intertidal zone. In wet winters, this species feeds on wet grasslands, such as at RNAD Gosport, which lie outside the SPA / Ramsar boundary. The PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which could involve the loss of greenfield sites that are functionally linked to the Portsmouth Harbour SPA / Ramsar. Therefore, LSEs of the emerging PLP on the SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

5.11 The Chichester and Langstone Harbour SPA / Ramsar on the eastern side of Portsmouth City is designated for waterfowl, waders and seabirds that routinely move beyond the designated site boundary. During high tide, its dark-bellied brent geese feed on grassland and wheat fields inland from the harbours. Curlew, another of the site's qualifying species, will use arable and grassland fields to roost, such as on Hayling Island, at Bosham and Chidham Peninsulas and West Wittering. The allocation of greenfield sites in the emerging PLP could lead to the loss of functionally linked habitats for these species, if such sites were to be sufficiently large, comprise suitable habitats and lie within the routine commuting distances for these species. Natural England's Supplementary Advice on the Conservation Objectives for the SPA / Ramsar specifies that supporting habitats for most qualifying species lie beyond the designated site boundary. It is to be noted that most of the bird species roost or feed on shingle, saltmarsh, grazing marsh and open water. These species are not expected to be impacted by greenfield development allocations. The PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which may involve development on greenfield sites that are functionally linked to the Chichester and Langstone Harbours SPA / Ramsar. Therefore, LSEs of the emerging PLP on the SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Solent & Southampton Water SPA / Ramsar

5.12 The closest section of Portsmouth City lies approx. 4km from the Solent & Southampton Water SPA / Ramsar. The bird species most likely to depend on functionally linked habitats are dark-bellied brent geese and, to a lesser extent, black-tailed godwit. Owing to the distance between the SPA / Ramsar and

Portsmouth City, and the fact that there are extensive areas of arable fields and grassland closer to the SPA / Ramsar in Fareham District, the loss of functionally linked habitats relating to the emerging PLP is perhaps least likely for this Habitats site. Notwithstanding this, the Habitats sites designated for birds are best assessed as a unit of interdependent sites and it is determined that a further assessment of the Solent & Southampton Water SPA / Ramsar is required. The PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which may result in the loss of greenfield sites that are functionally linked to the Solent & Southampton Water SPA / Ramsar. Therefore, LSEs of the emerging PLP on this site cannot be excluded and the site is screened in for Appropriate Assessment.

Screening of Policies – Loss of Functionally Linked Habitat

- 5.13 The Portsmouth Harbour SPA / Ramsar, the Chichester & Langstone Harbours SPA / Ramsar and the Solent & Southampton Water SPA / Ramsar are sensitive to the loss of greenfield sites that have a supporting role for its wildlife, either as roosting or foraging habitat. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.
- 5.14 The following policies in the PLP are screened in for Appropriate Assessment in relation to the impact pathway loss of functionally linked habitat because they allocate development sites that could be used by SPA / Ramsar waterfowl and / or waders:
- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
 - Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
 - Policy PLP5: Lakeside North Harbour – Allocates 50,000m² of employment space
 - Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net)
 - Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities
 - Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
 - Policy PLP10: Land West of Portsdown Technology Park – Allocates 12,500² of employment floorspace
 - Policy PLP11: Port Solent – Allocates 500 dwellings
 - Policy PLP12: St John's College – Allocates 212 dwellings
 - Policy PLP13: Fraser Range – Allocates 134 dwellings
 - Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
 - Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net), approximately 500sqm commercial space and approximately 440sqm community space.
 - Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
 - Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m² of employment land between 2020 and 2040
 - Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
 - Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Recreational Pressure in Functionally Linked Habitat

Portsmouth Harbour SPA / Ramsar

5.15 As highlighted in an earlier section, the qualifying waterfowl and waders in the Portsmouth Harbour SPA / Ramsar are sensitive to recreational pressure. By extension, this also applies to any functionally linked supporting habitats that these species depend on. Functionally linked habitats comprise amenity grassland, sections of beaches, sports grounds and commons, all of which are accessible to the public. If there is sufficient residential growth to lead to an increase in the recreational baseline, there is a potential for the site usage of birds to be impacted. The PLP allocates 13,603 net new dwellings, which is likely to increase the local recreational footfall. Therefore, LSEs of the emerging PLP on the Portsmouth Harbour SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

5.16 The Chichester and Langstone Harbours SPA / Ramsar is also designated for mobile waterfowl and wader species that critically depend on functionally linked habitats beyond the site boundary. A significant increase in recreational pressure in functionally linked habitat, may reduce the way in which SPA / Ramsar birds use supporting habitats. This is primarily due to the interruption of roosting or foraging and the increased energy expenditure associated with flight and avoidance behaviours. The PLP allocates 13,603 net new dwellings, which is likely to increase the local recreational footfall. Therefore, LSEs of the emerging PLP on the Chichester and Langstone Harbours SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Screening of Policies – Recreational Pressure in Functionally Linked Habitat

5.17 The Portsmouth Harbour SPA / Ramsar and the Chichester & Langstone Harbours SPA / Ramsar are sensitive to the impacts of recreational pressure in functionally linked habitats. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.

5.18 The following policies in the PLP are screened in for Appropriate Assessment in relation to the impact pathway recreational pressure because they allocate new residential growth or encompass projects that are likely to increase the overall footfall in the Portsmouth City area:

- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
- Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
- Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net).
- Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities.
- Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
- Policy PLP11: Port Solent – Allocates 500 dwellings
- Policy PLP12: St John's College – Allocates 212 dwellings
- Policy PLP13: Fraser Range – Allocates 134 dwellings
- Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
- Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net)

- Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
- Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
- Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Disturbance from Construction (in Habitats Sites and Functionally Linked Habitats)

Portsmouth Harbour SPA / Ramsar

5.19 The emerging PLP will result in construction works being undertaken to deliver new residential dwellings, employment opportunities or other infrastructure. Construction works may result in disturbance of SPA / Ramsar waterfowl either due to visual or noise disturbance. Research indicates that there are approximate threshold values for noise levels and distance of visual stimuli that, if exceeded, are likely to elicit behaviour changes in birds similar to those of recreational disturbance (e.g. increased vigilance, cessation of roosting / foraging and flight). The Reg.19 PLP does not allocate all individual sites (e.g. windfall) and a degree of uncertainty regarding the distribution of development therefore remains until individual planning application HRAs are produced. However, the plan contains broad Strategic Allocations in which the majority of construction is expected to occur. Regarding the Portsmouth Harbour SPA / Ramsar, the Strategic Allocations at Tipner (Policy PLP3 and PLP4) have the highest potential to result in construction disturbance. The proposal includes some requirement for land reclamation and a bridge between Tipner and Horsea Island as part of PLP3, for which construction within the SPA / Ramsar would be required. Overall, at least some of the construction works to deliver the 13,603 net new dwellings and at least 138,429m² of employment land will be carried out within or directly adjacent to the Portsmouth Harbour SPA / Ramsar. Therefore, LSEs of the emerging PLP on the SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

5.20 The Chichester and Langstone Harbour SPA / Ramsar directly borders the eastern side of Portsmouth City. Any construction works carried out to deliver the PLP's policies within close proximity to the SPA / Ramsar, have the potential to result in disturbance of the site's waterfowl and waders. The St. James' and Langstone Campus Strategic Allocation (Policy PLP8) adjoins part of the Chichester and Langstone Harbours SPA / Ramsar and also contains established functionally linked supporting habitat parcels for SPA / Ramsar waterfowl. Construction works carried out in this site have the potential to result in visual and noise disturbance on birds. Overall, at least some of the construction works to deliver the 13,603 net new dwellings and at least 138,429m² of employment land will be carried out within or directly adjacent to the Chichester and Langstone Harbours SPA / Ramsar. Therefore, LSEs of the emerging PLP on the site cannot be excluded and the site is screened in for Appropriate Assessment.

Screening of Policies – Disturbance from Construction (in Habitats Sites and Functionally Linked Habitat)

5.21 The Portsmouth Harbour SPA / Ramsar and the Chichester & Langstone Harbours SPA / Ramsar are sensitive to visual and noise disturbance resulting from construction. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.

5.22 The following policies in the PLP are screened in for Appropriate Assessment in relation to this impact pathway because construction works are likely to be required for their implementation:

- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
- Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the

application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (winter 2023).

- Policy PLP5: Lakeside North Harbour – Allocates 50,000m² of employment space
- Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net)
- Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities
- Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
- Policy PLP10: Land West of Portsdown Technology Park – Allocates 12,500m² of employment floorspace
- Policy PLP11: Port Solent – Allocates 500 dwellings
- Policy PLP12: St John's College – Allocates 212 dwellings
- Policy PLP13: Fraser Range – Allocates 134 dwellings
- Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
- Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net), approximately 500sqm commercial space and approximately 440sqm community space.
- Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
- Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m² of employment land between 2020 and 2040
- Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
- Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Water Quality

Solent and Dorset Coast SPA

5.23 During the breeding season, the qualifying tern species of the Solent and Dorset Coast SPA rely on marine foraging resources in relatively shallow coastal waters, which they hunt by plunge diving into the water column. Their prey includes small fish (e.g. sandeels) and crustaceans, which are potentially sensitive to negative changes in water quality. An increase in nitrogen in the marine environment (for example through an increase in treated wastewater discharge) could lead to cascading indirect effects on tern foraging resources, as well as direct impacts by creating oxygen-depleted habitats. Direct pollution could arise from construction works, such as for PLP3 Tipner West and Horsea Island East for the PLP4 Tipner East. Therefore, LSEs of the emerging PLP on this site cannot be excluded and the site is screened in for Appropriate Assessment.

Portsmouth Harbour SPA / Ramsar

5.24 As discussed earlier in the report, high nutrient concentrations (specifically nitrogen in the case of marine sites) in water can cause phytoplankton and macroalgae blooms. In turn eutrophication can lead to reduced dissolved oxygen (DO) concentrations, increased turbidity and changing water temperature. Such changes have the potential to alter the fish, epifaunal and infaunal communities that its qualifying waterfowl and wader species rely upon. Using the Water Framework Directive (WFD) targets for phytoplankton and macroalgae, NE's Supplementary Advice Note for the SPA / Ramsar identifies the water quality status of

the site to be in poor condition, affected by anthropogenic impacts including treated sewage effluent, diffuse agricultural fertiliser runoff and flood alleviation discharge.

- 5.25 However, a review of the Wastewater Treatment Works (WwTW) infrastructure indicates that Portsmouth City is served by the Portsmouth and Havant WwTW, which discharges to Langstone Harbour to the east of Portsea Island. The discharge location is in an entirely different estuary compared to the Portsmouth Harbour SPA / Ramsar, separated by a distance of approx. 16km including a section of the English Channel. Given this long distance and that natural nutrient attenuation, tidal mixing and dilution factors will come into play, it is concluded that the emerging PLP will be much less likely to result in LSEs on the water quality in the Portsmouth Harbour SPA / Ramsar than in Langstone Harbour. However, direct pollution could arise from construction works, such as for PLP3 Tipner West and Horsea Island East for the PLP4 Tipner East. Therefore, as a precaution LSEs of the emerging PLP on this site cannot be excluded and the site is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

- 5.26 The sensitivity of the Chichester and Langstone Harbours SPA / Ramsar to negative changes in water quality is similar to that of the Portsmouth Harbour SPA / Ramsar. The Environment Agency's Weight of Evidence approach identifies the site's current water quality status in terms of macroalgal and phytoplankton markers as poor. Portsmouth City is served by the Portsmouth and Havant WwTW which discharges into Langstone Harbour via a long outfall pipe. Given that there is direct hydrological connectivity between the WwTW and the SPA / Ramsar, it is considered that nitrogen in treated sewage effluent poses a risk to the site's qualifying species and their supporting habitats.
- 5.27 Given its hydrological connection with development in Portsmouth City, the Chichester and Langstone Harbours SPA / Ramsar (and the Solent Maritime SAC discussed further below) are the two main sites that would be impacted by additional nitrogen discharge in treated wastewater effluent. In line with Natural England guidance, all residential proposals would need to achieve nutrient neutrality to be demonstrated by detailed nitrogen calculations. The Appropriate Assessment will discuss the issue of nutrient neutrality further.
- 5.28 The PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which will increase the amount of wastewater produced in Portsmouth City and the volume of treated sewage effluent that will ultimately be returned to the sea south of the Portsmouth and Havant WwTW. Therefore, LSEs of the emerging PLP on this site cannot be excluded and the site is screened in for Appropriate Assessment.

Solent & Southampton Water SPA / Ramsar

- 5.29 The Solent & Southampton Water SPA / Ramsar, while sensitive to a decline in water quality in principle, is unlikely to be impacted by the emerging PLP. Primarily, this is due to the long distance between the discharge location of the Portsmouth and Havant WwTW and the boundary of the SPA / Ramsar. Due to the distance involved, it is considered that there is very limited to no hydrological connectivity between Langstone Harbour and the Solent & Southampton Water SPA / Ramsar. Any nutrient load from the WwTW will be subject to nutrient attenuation, tidal mixing and dilution, removing the potential for elevated nitrogen concentrations to reach the SPA / Ramsar. It is concluded that the emerging PLP will not result in LSEs on the water quality in the Solent & Southampton Water SPA / Ramsar. Therefore, this site is screened out from Appropriate Assessment in relation to this impact pathway.

Solent Maritime SAC

- 5.30 The Solent Maritime SAC is a complex marine site, comprising a wide range of habitats including Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*), spartina swards (*Spartinion maritimae*) and *Salicornia* (and other annuals colonizing mud and sand). The community composition and overall ecological integrity in these habitats is tightly linked to water quality. Maintaining the structure of these habitats is also crucial for the overlapping SPAs / Ramsars, which are designated for birds that feed on common saltmarsh grass, invertebrates or fish. Natural England's Supplementary Advice Note for the SAC specifies that the site is currently in poor water quality condition (as shown by indicators of eutrophication). Notwithstanding this, other indicators of water quality (e.g. DO concentrations, turbidity) have been shown to be in good condition.
- 5.31 The Solent Maritime SAC encompasses the area around Langstone Harbour, into which treated sewage effluent from the Portsmouth and Havant WwTW will discharge. Therefore, there is direct hydrological

linkage between growth allocated in the emerging PLP and the Solent Maritime SAC, with the potential for additional nitrogen to be added into the ecosystem. The PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which will increase the amount of wastewater produced in Portsmouth City and the volume of treated sewage effluent that will reach the Solent Maritime SAC. Therefore, LSEs of the emerging PLP on this site cannot be excluded and the site is screened in for Appropriate Assessment.

Screening of Policies – Water Quality

- 5.32 Overall, for Solent & Dorset Coast SPA, Portsmouth Harbour SPA/Ramsar site, Chichester & Langstone Harbours SPA / Ramsar and the Solent Maritime SAC LSEs relating to water quality changes cannot be excluded. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.
- 5.33 The following policies in the PLP are screened in for Appropriate Assessment in relation to the impact pathway water quality because they will increase the volume of treated sewage effluent reaching the Solent:
- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
 - Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
 - Policy PLP5: Lakeside North Harbour – Allocates 50,000m² of employment space
 - Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net)
 - Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities
 - Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
 - Policy PLP10: Land West of Portsdown Technology Park – Allocates 12,500m² of employment floorspace
 - Policy PLP11: Port Solent – Allocates 500 dwellings
 - Policy PLP12: St John's College – Allocates 212 dwellings
 - Policy PLP13: Fraser Range – Allocates 134 dwellings
 - Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
 - Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net), approximately 500sqm commercial space and approximately 440sqm community space.
 - Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
 - Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m² of employment land between 2020 and 2040
 - Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
 - Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Water Quantity, Level and Flow

Solent and Dorset Coast SPA

- 5.34 The foraging terns for which this SPA are designated are not specialised feeders and prey on a range of fish including sandeels, clupeids such as herring and sardine, invertebrates and crustaceans. The SPA is c.890 km² in area, much of which is open sea and not heavily dependent on a particular volume or rate of freshwater inputs. Of the five species of tern which regularly breed in Great Britain, little tern has the most limited foraging range from its nest colonies, but even for this species the mean range is 2.1km⁸² and therefore small scale local differences in freshwater input will only affect a very small part of the overall foraging area even when considered cumulatively. Therefore, LSEs of the emerging PLP on this site can be excluded and it is screened out of Appropriate Assessment.

Portsmouth Harbour SPA / Ramsar

- 5.35 The bird species for which the Portsmouth Harbour SPA / Ramsar is designated depend on sufficient water levels for roosting and foraging. For example, red-breasted merganser require an optimal water depth between 2-4m for efficient detection of prey species at critical times of the year. Other species such as dark-bellied brent geese and black-tailed godwits require sufficient amounts of freshwater in foraging or roosting habitats, such as mudflats and grazing marsh. The hydrology and flow in supporting habitats will have critical impacts on available water area, water depth, salinity, turbidity and dissolved oxygen concentrations.
- 5.36 The increasing population and employment centres in Portsmouth City will be supplied with potable water. Depending on where and how much freshwater is extracted, this might impact the amount of freshwater flowing into the SPA / Ramsar and the wider marine environment. Meeting Portsmouth's water demand may also involve the desalination of saltwater, thereby removing water directly from the marine environment. Notwithstanding the source of potable water, any water supply solution that involves the expansion of existing licensed abstractions or development of a new water resource, has the potential to affect the water quantity, level and flow in the SPA / Ramsar.
- 5.37 The PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which will increase the amount of potable water needed to meet Portsmouth City's water demand. This may have implications on the water quantity, level and flow in the Portsmouth Harbour SPA / Ramsar. Therefore, LSEs of the emerging PLP on this site cannot be excluded and it is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

- 5.38 The Chichester and Langstone Harbours SPA / Ramsar is designated for bird species that all depend on natural fluctuations in water depth in their supporting habitats. For example, shovelers feed on small crustaceans and other aquatic invertebrates that they filter out from water with comb-like projections called lamellae. Given that they feed from the water surface, they depend on an optimal water depth of less than 0.3m deep. In contrast, redshank (a medium-sized wader species) feeds on molluscs and crustaceans by probing their bills into substrate. Redshank require a standing water depth between 1-5cm deep.
- 5.39 Various freshwater bodies contribute to Langstone harbour, including the Great Salterns Drain, Brockhampton Stream, Harts Farm Way Stream, Hermitage Stream, Bedhampton Brook, West Brook, River Ems and others. Additional abstraction in excess of the agreed abstraction licenses from any of these connecting waterways or the development of new water resources could reduce freshwater input into the Chichester and Langstone Harbours SPA / Ramsar, potentially affecting the foraging / roosting habitats of SPA / Ramsar birds.
- 5.40 Overall, the PLP allocates 13,603 net new dwellings and 138,429m² of employment land, which will increase the amount of potable water needed to meet Portsmouth City's water demand. This may have implications on the water quantity, level and flow in the Chichester and Langstone Harbours SPA / Ramsar. Therefore, LSEs of the emerging PLP on this site cannot be excluded and it is screened in for Appropriate Assessment.

Solent & Southampton Water SPA / Ramsar

- 5.41 The qualifying species in the Southampton Water SPA / Ramsar also depend on appropriate water depths and extents. As for other Habitats sites in the Solent, specific requirements differ between species. Owing

⁸² Natural England. 2016. Solent and Dorset Coast Departmental Brief. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/560622/solent-dorset-departmental-brief.pdf

to their foraging strategy, teal ideally forage in standing water of less than 0.1m deep. In contrast, black-tailed godwits forage in slightly deeper sections of water. Maintaining appropriate availability of water is also important for ringed plovers and dark-bellied brent geese. Water supply strategies to meet the future demand for Portsmouth City's potable water demand, have the potential to alter the freshwater supply in the SPA / Ramsar.

- 5.42 Overall, the PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which will increase the amount of potable water needed to meet Portsmouth City's water demand. This may have implications on the water quantity, level and flow in the Solent & Southampton Water SPA / Ramsar. Therefore, LSEs of the emerging PLP on this site cannot be excluded and it is screened in for Appropriate Assessment.

Solent Maritime SAC

- 5.43 The Solent Maritime SAC is designated for several habitats and the Desmoulin's whorl snail, all of which are sensitive to changes in the hydrological flow regime. For example, a reduction in the amount of freshwater input is likely to affect the salinity, turbidity and habitat available in the habitats of the SAC. As such, a reduced water flow in waterbodies feeding into the SAC could result in the drying up of saltmarsh in the supralittoral zone. Changes in freshwater supply may have knock-on impacts on the composition of plant communities and the associated fauna, such as the Desmoulin's whorl snail. This species is adapted to low salinity conditions and is highly sensitive to an increase in salt concentrations.
- 5.44 Overall, the PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which will increase the amount of potable water supplied to Portsmouth City. This may have implications on the water quantity, level and flow in the Solent Maritime SAC. Therefore, LSEs of the emerging PLP on this site cannot be excluded and it is screened in for Appropriate Assessment.

Screening of Policies – Water Quantity, Level and Flow

- 5.45 LSEs regarding water quantity, level and flow cannot be excluded for any of the Solent's Habitats sites. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.
- 5.46 The following policies in the PLP are screened in for Appropriate Assessment in relation to the impact pathway water quantity, level and flow because they directly increase the water demand in Portsmouth City:
- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
 - Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
 - Policy PLP5: Lakeside North Harbour – Allocates 50,000m² of employment space
 - Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net)
 - Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities
 - Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
 - Policy PLP10: Land West of Portsdown Technology Park – Allocates 12,500m² of employment floorspace
 - Policy PLP11: Port Solent – Allocates 500 dwellings
 - Policy PLP12: St John's College – Allocates 212 dwellings
 - Policy PLP13: Fraser Range – Allocates 134 dwellings

- Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
- Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net), approximately 500sqm commercial space and approximately 440sqm community space.
- Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
- Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m² of employment land between 2020 and 2040
- Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
- Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city.

Atmospheric Pollution

Portsmouth Harbour SPA / Ramsar

- 5.47 All four qualifying species (red-breasted merganser, black-tailed godwit, dark-bellied brent goose and dunlin) of the SPA / Ramsar rely on littoral sediment, which APIS identifies as being relatively tolerant of atmospheric nitrogen deposition (with a relatively high nitrogen critical load of 20-30 kg N/ha/yr, recently (Spring 2023). This was lowered to 10-20 kgN/ha/yr for upper saltmarsh in 2023 but upper saltmarsh is of less importance to the SPA/Ramsar birds than lower and pioneer saltmarsh, and SPA birds are less sensitive to subtle botanical changes than major structural changes. Therefore it is considered that for the SPA/Ramsar the higher critical load of 20 kgN/ha/yr is appropriate. For black-tailed godwits, which feed on aquatic invertebrates in mud, the effect of nitrogen addition to the system may balance out because an increase in nutrients may increase the number of prey items available to them. In contrast, dark-bellied brent geese feed on coastal saltmarsh, which could be replaced by other plant communities under elevated nutrient concentrations. Therefore, an increase in road traffic could lead to negative impacts on the geese due to the loss of suitable foraging habitat.
- 5.48 To establish the sensitivity of a Habitats site to atmospheric pollution arising from traffic, a detailed assessment of sensitive habitats within the site needs to be undertaken. Habitat mapping on MAGIC identifies that there are relatively few sections of coastal saltmarsh within the SPA / Ramsar in general. Only one of these habitat parcels lies within 200m of a major road, the A32 Gosport Road to the south-east of Cams Alders Sports Centre. Even here, the closest area of saltmarsh is 171m from the roadside and consists of a small patch, well beyond the zone where most of the nitrogen from the road will be deposited. This road is unlikely to constitute a major journey-to-work route for the majority of Portsmouth City residents.
- 5.49 However, part of the proposals for PLP3 (Tipner West and Horsea Island East) involve the creation of a bridge for buses running alongside the M275, impacting mudflat habitat. Therefore this is screened in for discussion in the appropriate assessment.

Chichester and Langstone Harbours SPA / Ramsar

- 5.50 While the qualifying species of the Chichester and Langstone Harbours SPA / Ramsar are not directly sensitive to atmospheric nitrogen deposition, the prey species and habitats that the waterfowl and waders rely on may be impacted by atmospheric pollutant deposition. Most waders feed on crustaceans or molluscs in littoral sediment (most often the mudflats) and this habitat has a relatively high nitrogen critical load of 20-30 kg N/ha/yr. In 2023 the critical load was lowered to 10-20 kgN/ha/yr for upper saltmarsh, but upper saltmarsh is of less importance to the SPA/Ramsar birds than lower and pioneer saltmarsh and SPA birds are less sensitive to subtle botanical changes than major structural changes. Therefore it is considered that for the SPA/Ramsar the higher critical load of 20 kgN/ha/yr is appropriate.
- 5.51 The SPA/Ramsar is therefore of relatively low sensitivity to atmospheric nitrogen and a review of evidence on APIS highlights that the current background nitrogen deposition rate (12.06-13.44 kgN/ha/yr) lies far below the 20 kgN/ha/yr nitrogen critical load for intertidal mudflats and lower saltmarsh. The relatively low sensitivity applies to lower saltmarsh, which provides foraging habitat for shelducks, wigeon and dark-bellied

brent geese. A section of saltmarsh within the SPA / Ramsar lies adjacent to the A27 / A3 interchange in the adjoining authority of Havant. This road is likely to form a major journey-to-work route for commuters travelling to or from Portsmouth City. As such, it is considered that LSEs of the PLP on saltmarsh habitat in the Chichester and Langstone Harbours SPA / Ramsar cannot be excluded.

- 5.52 The Chichester and Langstone Harbours SPA / Ramsar is also designated for three nesting seabird species: sandwich tern, common tern and little tern. Terns preferentially nest in sand dunes or vegetated shingle. Therefore, detailed habitat mapping within the Chichester and Langstone Harbours SPA / Ramsar was consulted on MAGIC to establish whether potential tern habitat lies within 200m of potential commuter routes for Portsmouth City residents. No sand dune or other suitable nesting habitat was identified within this screening distance within or outside of Portsmouth City. A section of vegetated shingle appears from MAGIC to lie directly adjacent to the A27 in Havant District within the Farlington Marshes Nature Reserve. Any new residents with employment in the Districts of Havant, Chichester or East Hampshire would pass this part of the SPA / Ramsar, as this lies along the quickest route identified on navigation software (e.g. Google Maps, Waze).
- 5.53 However, scrutiny of aerial photography suggests that this is a mapping error as no coastal vegetated shingle is visible in Farlington Marshes Nature Reserve. A detailed traffic and air quality impact assessment was undertaken for Havant's Local Plan⁸³. This considered the SPA adjacent to the A27. Table 3-6 of that report discusses ground truthing undertaken for the HRA and for the relevant part of Farlington Marshes no vegetated shingle is mentioned, which supports the view that this is a mapping data error. The Habitats Regulations Assessment of the Havant Local Plan also states that *'the areas predicted to exceed the screening thresholds overlap the northern-most island within this reserve; however, no suitable breeding habitat for common tern is present within this area. In addition, BTO core count data indicates records of common tern have only been made for the 14/15 monitoring season at a peak count of 4 individuals. Whilst records of common tern have only been made during one monitoring season in Langstone Harbour, annual recordings of the species have been made at the adjacent Chichester Harbour. Given the isolated single-year record of this species at Langstone Harbour, and the preference of common tern for Chichester Harbour, any impacts to potentially suitable breeding habitat within the areas of exceedance are unlikely to cause adverse effects to this species.'* Given the general absence of suitable nesting habitats for terns in Langstone Harbour and the low counts of terns in this section of the SPA / Ramsar, it is concluded that the emerging PLP will not result in LSEs on nesting terns in relation to atmospheric pollution.

Solent Maritime SAC

- 5.54 The Solent Maritime SAC stretches along the eastern boundary of Portsmouth City. It is designated for a variety of habitats, including saltmarsh, shifting dunes and perennial vegetation of stony banks⁸⁴. APIS identifies that both coastal dunes and perennial vegetation of stony banks are sensitive to nitrogen deposition with nitrogen critical loads of 10-20 kg N/ha/yr and 8-15 kg N/ha/yr respectively. There is sensitive saltmarsh habitat within 200m of the A27 in the adjoining authority of Havant, which has already been screened in as part of the overlapping Chichester and Langstone Harbours SPA / Ramsar. There is no sand dune habitat identified within 200m of relevant roads.
- 5.55 Ground truthing carried out by Ricardo Energy & Environment for the aforementioned air quality study for Havant Borough Council suggested that there were two areas comprising perennial vegetation of stony banks within 200m of the A2030, which run alongside the SAC on a north-south axis and is otherwise bordered by intertidal mudflats. This is likely to be an important route for residents out-commuting from Portsmouth City into adjacent authorities (e.g. Havant), or people working in Portsmouth City's southern employment centres. However, detailed survey work undertaken for the NPI Phase 4 Coastal Defence Project by Coastal Partners indicated that although the substrate was shingle, the habitat was saltmarsh (primarily communities SM24 (*Elymus pycnanthus* salt-marsh community) and SM14 (*Halimione portaculoides* salt-marsh community)). These are lower marsh or otherwise low nitrogen sensitivity

⁸³ <https://www.havant.gov.uk/sites/default/files/documents/Air%20Quality%20Habitat%20Regulations%20Assessment.pdf>

⁸⁴ Note that the Habitats Directive definition of 'perennial vegetation of stony banks' does not apply to any and all perennial vegetation found on shingle but to very specific plant communities. According to the JNCC page for this habitat it is: *'namely SD1 Rumex crispus – Glaucium flavum shingle community. Narrow, less-stable structures (spits and bars or the fringing beach associated with older, fossil beaches) are more exposed to waves or salt spray. Where wave energy causes movement of the shingle, the plant communities have affinities with 1210 Annual vegetation of drift lines. The presence of the yellow horned-poppy Glaucium flavum and the rare sea-kale Crambe maritima and sea pea Lathyrus japonicus, all species that can tolerate periodic movement, is significant. In more stable areas above this zone, where sea spray is blown over the shingle, plant communities with a high frequency of salt-tolerant species such as thrist Armeria maritima and sea campion Silene uniflora occur. These may exist in a matrix with abundant lichens.'*

communities which would mean the higher critical load of 20-30 kgN/ha/yr is more applicable. Nonetheless, traffic and air quality modelling has been undertaken for this link and is discussed in the appropriate assessment.

Screening of Policies – Atmospheric Pollution

5.56 LSEs regarding atmospheric pollution cannot be excluded for the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC, due to the potential for impacts on saltmarsh habitat. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.

5.57 The following policies in the PLP are screened in for Appropriate Assessment in relation to this impact pathway, because they are likely to lead to an increase in commuter traffic along major roads within 200m of Habitats sites:

- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
- Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
- Policy PLP5: Lakeside North Harbour – Allocates 50,000m² of employment space
- Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000 m² net)
- Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities
- Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
- Policy PLP10: Land West of Portsdown Technology Park – Allocates 12,500m² of employment floorspace
- Policy PLP11: Port Solent – Allocates 500 dwellings
- Policy PLP12: St John's College – Allocates 212 dwellings
- Policy PLP13: Fraser Range – Allocates 134 dwellings
- Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
- Policy PLP15: Somers Orchard – Allocates 565 dwellings (292 net), approximately 500sqm commercial space and approximately 440sqm community space.
- Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
- Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m² of employment land between 2020 and 2040
- Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
- Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Impacts of Tall Buildings on Flight Lines and Sight Lines

Portsmouth Harbour SPA / Ramsar

5.58 The Portsmouth Harbour SPA / Ramsar is partly designated for black-tailed godwits and brent geese. Both species are reliant on functionally linked habitats outside the designated site boundary for roosting and / or foraging. It is well known that these birds preferentially seek out habitats with clear flight lines as this facilitates navigation. Furthermore, land parcels with open sight lines are preferred for the early detection of predators or the visibility of display behaviours. The PLP comprises Strategic Allocations that may involve the construction of tall buildings and are likely to increase the extent of urban frontage within Portsmouth City. If tall buildings or new urban frontages were to be constructed surrounding functionally linked habitats, this may reduce the ability of qualifying bird species to use these habitats. Overall, the PLP allocates 13,603 net new dwellings and at least which will increase the amount of urban frontage in Portsmouth City and may involve the construction of tall buildings. If close enough to functionally linked habitats, this may render this supporting land less suitable to SPA / Ramsar waterfowl and waders. Therefore, LSEs of the emerging PLP on the Portsmouth Harbour SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

5.59 The Chichester and Langstone Harbours SPA / Ramsar is also designated for mobile bird species that depend on non-designated supporting habitats, preferentially those that offer clear flight lines and sight lines. Any tall buildings or new urban frontages within close proximity to functionally linked habitats could reduce the usage of such sites by birds. Review of the emerging PLP indicates that one Strategic Allocation (St. James' and Langstone Campus) has the potential to affect the flight lines and sight lines in functionally linked habitats relevant to the SPA / Ramsar. Overall, the PLP allocates 13,603 net new dwellings and at least 138,429m² of employment land, which will increase the amount of urban frontage in Portsmouth City and may involve the construction of tall buildings. If close enough to functionally linked habitats, this may render this supporting habitat less suitable to SPA / Ramsar waterfowl and waders. Therefore, LSEs of the emerging PLP on the Chichester and Langstone Harbours SPA / Ramsar cannot be excluded and the site is screened in for Appropriate Assessment.

Screening of Policies – Impacts of Tall Buildings on Flight Lines and Sight Lines

5.60 The Portsmouth Harbour SPA / Ramsar and the Chichester & Langstone Harbours SPA / Ramsar are sensitive to impacts of tall buildings on flight lines and sight lines of SPA / Ramsar birds, in particular relating to new buildings in the vicinity of functionally linked habitat. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.

5.61 The following policies in the PLP are screened in for Appropriate Assessment in relation to this impact pathway because they involve the construction of new buildings and increased urban frontages:

- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
- Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
- Policy PLP5: Lakeside North Harbour – Allocates 50,000m² of employment space
- Policy PLP6: Portsmouth City Centre – Allocates 4,158 new dwellings and 1,546 m² gross commercial floorspace (20,000m²)
- Policy PLP7: Fratton Park and The Pompey Centre – Allocates the expansion of the football stadium from 21,000 to 26,000 capacity, 710 new dwellings and hotel with mixed conference and event facilities

- Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
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- Policy PLP12: St John's College – Allocates 212 dwellings
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- Policy PLP14: The News Centre, Hilsea – Allocates 100 dwellings
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- Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
- Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m² of employment land between 2020 and 2040
- Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
- Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Coastal Squeeze

Solent and Dorset Coast SPA

5.62 As described in the section on impact pathways, coastal squeeze describes the disappearance of protected habitats as a result of sea level rise and coastal defences preventing an inland migration of these habitats. The SPA encompasses the western side of Portsea Island, an area which is characterised by 'Hold the Line' defences to prevent the flooding of highly populated conurbations. Sea level rise in this area could contribute to the loss of intertidal mudflats. However, the SPA is c.890 km² in area, much of which is open sea, and even the tern species with the most limited foraging range (little tern) has a mean range of 2.1km⁸⁵. Moreover, the plunge diving tern species for which the SPA is designated are not specialised feeders and unlike waterfowl and waders are not heavily dependent on intertidal habitats. Therefore, LSEs of the emerging PLP on the Solent and Dorset Coast SPA /as a result of coastal squeeze can be excluded and the site is screened out of Appropriate Assessment.

Portsmouth Harbour SPA / Ramsar

5.63 As described in the section on impact pathways, coastal squeeze describes the disappearance of protected habitats as a result of sea level rise and coastal defences preventing an inland migration of these habitats. The Portsmouth Harbour SPA / Ramsar lies on the western side of Portsea Island, an area which is characterised by 'Hold the Line' defences to prevent the flooding of highly populated conurbations. Sea level rise in this area could contribute to the loss of intertidal mudflats and, to a lesser degree, saltmarsh. The PLP allows for new or replacement defence structures and any changes to the existing shoreline management could fuel further loss of designated habitats. Therefore, LSEs of the emerging PLP on the Portsmouth Harbour SPA / Ramsar as a result of coastal squeeze cannot be excluded and the site is screened in for Appropriate Assessment.

Chichester and Langstone Harbours SPA / Ramsar

5.64 The Chichester and Langstone Harbours SPA / Ramsar also encompasses important mudflat and saltmarsh habitats, the disappearance of which may significantly reduce the amount of roosting and foraging habitat

⁸⁵ Natural England. 2016. Solent and Dorset Coast Departmental Brief. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/560622/solent-dorset-departmental-brief.pdf

for SPA / Ramsar waterfowl and waders. The SPA / Ramsar lies on the eastern side of Portsmouth, which is also protected from flooding by 'Hold the Line' defences. While the existing shoreline management underwent HRA previously, any deviation from the current defence structures may result in additional impacts on the Chichester and Langstone Harbours SPA / Ramsar. Therefore, LSEs of the emerging PLP on the site due to coastal squeeze cannot be excluded and the site is screened in for Appropriate Assessment.

Screening of Policies – Coastal Squeeze

- 5.65 The Portsmouth Harbour SPA / Ramsar and the Chichester & Langstone Harbours SPA / Ramsar are sensitive to the process of coastal squeeze. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on these sites is required.
- 5.66 The following policies in the PLP are screened in for Appropriate Assessment in relation to this impact pathway because they allow for new and / or replacement coastal defence structures:
- Policy PLP3: Tipner West and Horsea Island East – allocates 814 to 1250 new dwellings
 - Policy PLP4: Tipner East – Allocates 1,056 new dwellings; these are already subject to two submitted planning applications (or 835 new homes from Vivid Homes (22/01292/FUL) and the application for 221 new homes from Bellway (21/01357/FUL) both of which are pending the completion of legal agreements at the time of writing (spring 2024).
 - Policy PLP8: St James' and Langstone Campus – Allocates 417 dwellings
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 - Policy PLP13: Fraser Range – Allocates 134 dwellings
 - Policy PLP16: Housing Target – Provides for the provision of 13,603 net new dwellings between 2020 and 2040
 - Policy PLP25: Employment Target – Provides for the provision of at least 138,429 m2 of employment land between 2020 and 2040
 - Policy PLP28: Town Centres – promotes projects that result in greater footfall and extended duration of activity uses in Portsmouth City
 - Policy PLP30: Cultural and tourism economy– supports the delivery of cultural and tourism facilities, particularly in the coastal area of the city

Permanent Habitat Loss of Habitats Sites

Portsmouth Harbour SPA / Ramsar and Solent & Dorset Coast SPA

- 5.67 Other than new flood defences (discussed above), Policy PLP3: Tipner West & Horsea Island East allocates the delivery of 58,000m² marine employment floor space, 814 to 1,250 residential dwellings, and a bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only. In association with marine employment, the policy states that *'the deep water access to Tipner Point and the new marine hub quaysides will be maintained'*. To ensure deep water access to the new marine hub quaysides dredging of intertidal habitat within Portsmouth Harbour SPA/Ramsar site will be required, resulting in around 2.1ha permanent inter-tidal habitat loss.
- 5.68 Policy PLP3 requires any planning application to avoid further loss of habitat or, if that is not viable or feasible, minimise such loss to that required to enable the viable and feasible development of the site in line with the development quanta set out in the policy whilst protecting the integrity of the international, national and local nature designations.
- 5.69 Accordingly, any further loss of habitat depends on the design of development at the project stage and the evidence advanced as to viability/feasibility. While no further loss of habitat is inevitable under Policy PLP3,

it is likely that the bridge between Tipner West and Horsea Island East will require piers within the SPAs/Ramsar site which would result in around 0.3ha permanent intertidal habitat loss.

- 5.70 In addition, other aspects of development delivery may also require land-take from the SPAs/Ramsar site. The red line plan for the PLP3 allocation (Figure 4.2) shows two areas of possible subtidal reclamation from the SPAs/Ramsar site (collectively amounting to around 0.5ha) for the marine hub element, reflecting the reclamation considered to be necessary by the project promoter in both of the options currently under consideration. Further, any option that delivers the higher range of housing numbers is likely to involve development on the terrestrial part of Portsmouth Harbour SPA/Ramsar site to the south of Tipner West (up to 3.6ha).
- 5.71 Thus, while Policy PLP3 inevitably results in 2.1ha of permanent intertidal habitat loss from dredging, this HRA proceeds on the “realistic worst case” basis that it may also enable the permanent loss of 0.3ha of intertidal habitat arising from the potential bridge piers, up to 0.5ha of subtidal habitat from land reclamation for the functioning of the marine hub, and up to 3.6ha of terrestrial habitat to the southern extent of the allocation (to deliver more homes). The permanent habitat loss would effectively mean that a portion of the Portsmouth Harbour SPA / Ramsar would be lost to development. Any direct, permanent loss of SPA / Ramsar land will inevitably have negative impacts on qualifying waterfowl and wader species. Overall, LSEs of the emerging PLP on the Portsmouth Harbour SPA / Ramsar as a result of direct permanent habitat loss cannot be excluded and the site is therefore screened in for Appropriate Assessment.

Screening of Policies – Permanent Habitat Loss

- 5.72 The Solent & Dorset Coast SPA and Portsmouth Harbour SPA / Ramsar are sensitive to the direct permanent habitat loss. It is determined that an Appropriate Assessment of potential adverse effects of the PLP on this site is required.
- 5.73 The following policy in the PLP is screened in for Appropriate Assessment in relation to this impact pathway because it proposes land reclamation, which would result in the disappearance of habitat supporting the qualifying SPA seabirds, waterfowl and waders:
- Policy PLP3: Tipner West & Horsea Island East – between 814 and 1,250 new dwellings, a marine hub with a working quayside and up to 58,000 square metres of marine employment floorspace (class E(g) offices, research and development, light industrial, B2 general industrial and B8 storage or distribution), a bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only, and flood defences along the peninsula edges of Tipner West and Horsea Island East in line with robust climate change scenarios.

6. Appropriate Assessment

Recreational Pressure

- 6.1 The PLP allocates 13,603 net new dwellings between 2020 and 2040, which lie in close proximity to Habitats sites designated for non-breeding and breeding bird species and intertidal habitats (in the case of Solent Maritime SAC) that are sensitive to recreational pressure. Many of the threats and pressures for these different sites will arise from similar recreational activities. Furthermore, the measure that is in place to mitigate recreational pressure effects is of strategic nature and applies to all Habitats sites in the Solent. Therefore, to avoid repetition, the discussion of all relevant sites is combined into one section below.

Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar, Solent & Southampton Water SPA / Ramsar and the Solent Maritime SAC

- 6.2 Portsmouth City is an island city with some of its urbanised area located on the mainland separated by a creek. It is surrounded by three Habitats sites sensitive to recreational pressure (due to comprising open marine foraging waters, the Solent and Dorset Coast SPA is unlikely to be affected by recreational pressure), namely the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC. Given how intensively the Solent region is urbanised and the close proximity of Portsmouth City to these Habitats sites, it is predicted that the demand for and recreational burden in coastal sites will increase throughout the PLP period. The built-up nature of Portsea Island somewhat restricts recreational access to the SPAs / Ramsars and the Solent Maritime SAC on the island itself. However, access to the Habitats sites is less restricted in the adjoining authorities of Fareham (to the west) and Havant (to the east), both of which are only a short drive from Portsmouth City. Therefore, even if potential negative impacts of the emerging PLP were not to occur on the island itself, additional recreational footfall would very likely occur in other sensitive areas of the Solent further away.
- 6.3 Natural England had previously objected to a planning application to deliver housing at St James Hospital and the former Langstone Campus (Policy PLP8) due to concerns about recreational pressure on Chichester and Langstone Harbours SPA and Solent Maritime SAC which they did not consider could be alleviated solely by contributions to Bird Aware Solent. The updated Milton Common Mitigation Framework has therefore been adopted (February 2022) to alleviate the recreational impact of development at the St James Hospital and Former Langstone Campus on Chichester and Langstone Harbours SPA and Solent Maritime SAC. This framework sets out a Suitable Alternative Natural Green Space (SANG) type mitigation scheme. Visitor surveys were conducted at Milton Common in 2022. These surveys concluded that, using the standard 8ha per 1,000 people, Milton Common has 0.55ha of residual capacity. In order to compensate for the expected 1,052 visitors from the development, a further 7.866ha is required. The plan to provide this 7.866ha of addition capacity is to utilise management measures to increase the accessible area on site. This will include the clearance of scrub, improvements to the path network and maintaining amenity grassland and meadows. The framework calculates a cost of £9,528.49 per unit for the dwellings at St James and the former Langstone Campus. This should be paid by the site promoter.
- 6.4 With specific regard to Tipner West & Horsea Island East (Policy PLP3), the project is taking a mitigation hierarchy approach from concept masterplanning to avoid additional recreational pressures as much as possible by managing access to the European sites for new and existing residents, and discouraging and preventing access where the resultant effects would be adverse. The contribution to the wider Solent Bird Aware scheme and extension of ranger support associated with PLP3 will be considerable, and further mitigation measures will be implemented to address any residual effects that cannot be addressed by these high level strategic and masterplan-led approaches. The new residents of Tipner East and Tipner West will also both benefit from the semi-natural recreational opportunities to be provided by Horsea Island Open Space (Policy PLP9) which is being brought forward on the former Paulsgrove Landfill Site under extant Policy PCS3 (Horsea Island) of the Portsmouth Local Plan adopted in January 2012. This area of new Open Space is valuable in contributing to the mitigation of recreational pressure on the Solent Habitats sites because the SRMS stipulates that some developments may require additional mitigation due to their size or proximity to sensitive Habitats sites. The Horsea Island Open Space has emerged from initial visitor surveys for the SDMP and will provide 64ha of open space for Portsmouth City's population. The HRA of

the Portsmouth Core Strategy (July 2011) discussed that the average walking distance from home of residents in Hilsea and Milton when walking or dog-walking is between 1-2km. This suggests that residential housing on the Tipner peninsula is within the anticipated catchment of the proposed Horsea Island Open Space, especially when considering the planned Tipner-Horsea bridge connection. According to the PfSH Green Infrastructure Implementation Framework, one of the key aims of the Horsea Island Open Space is to divert recreational activities from designated Habitats sites to the less sensitive former landfill site.

- 6.5 In discussions over this Local Plan HRA, Natural England have also identified that Policy PLP13 (Fraser Range) for 134 dwellings should also develop a bespoke solution to recreational pressure in addition to payments into the Bird Aware Solent scheme. Based on discussions with the applicant it is understood this is likely to involve enhancements to Fort Cumberland Open Space. This is reflected in Policy PLP13 which states *'The developer will provide mitigation of any alone impacts on the habitat that is functionally linked to Solent's SPAs / Ramsars (P78 / P142 / P144). This is in addition to the contributions provided through the Solent Recreation Mitigation Strategy'*.

In-combination assessment of recreational pressure

- 6.6 The Solent is estimated to receive approx. 52 million recreational visits per annum and recreational pressure has thus been a historic issue over the past decade. Consequently, a lot of research on various aspects surrounding recreation has been undertaken in the Solent. The following evidence base assessing different components of recreational pressure has been compiled (note that this HRA will not re-examine all these data, as this is regarded as well-established and is assessed in detail in numerous other reports):

- Desk-based study identifying the strategic issues in the Solent
- Winter visitor fieldwork to establish a recreational baseline
- Field study on recreational disturbance of overwintering waterfowl and waders
- Household survey to assess the Solent's importance as a recreation resource in the wider population
- Detailed modelling of future housing scenarios and their impacts on disturbance
- Emerging avoidance and mitigation strategy for the Solent

- 6.7 Some of these have already been discussed in Chapter 4. Other sources are on the BirdAware Solent website ([Our strategy - Bird Aware Solent](#)). The cumulative evidence available for the Solent region highlighted that recreational use was unsustainable and impacts on the qualifying SPA / Ramsar bird species were evident, putting the Conservation Objectives of Solent's Habitats sites at risk. An initial framework for an avoidance and mitigation strategy conceptualised by Footprint Ecology was therefore developed further, culminating in the Bird Aware Solent Recreation Mitigation Strategy (2017). Bird Aware Solent stipulates that all net new residential development within a 5.6km catchment zone of the coast will result in Likely Significant Effects on coastal SPAs / Ramsars. The catchment boundary was based on the distance where the majority (i.e. 75%) of coastal visitors live. It was therefore decided that mitigation measures and monitoring delivered as part of Bird Aware Solent are to be funded by developer contributions (varied depending on the number of bedrooms delivered) per net new residential dwelling delivered within the 5.6km catchment zone.

- 6.8 The Bird Aware Solent Strategy proposes the following mitigation and monitoring measures to reduce the impact of recreational pressure:

- A team of 5-7 coastal rangers working to reduce disturbance
- Initiatives to encourage responsible dog walking in less sensitive parts of the coast
- Preparation of Codes of Conduct for high-impact recreational activities
- Tailored habitat management projects for specific sites
- A monitoring schemes to track the effectiveness of mitigation measures
- Providing alternative recreational greenspace (e.g. the Alver Valley Pilot Project)

Updates to the Evidence Base

- 6.9 Further surveys extending the evidence base and assessing the long-term effectiveness of the Bird Aware project have since been undertaken. Footprint Ecology undertook a further visitor survey analysing visitor data from winter 2017 / 2018. This survey was commissioned as part of the baseline monitoring for the Bird Aware Project and in line with the monitoring strategy designed for the project. Continued monitoring work is required to ensure that mitigation is successfully delivered, is effective and developer charges have been sufficient / appropriate. Visitor surveys are key to this, enabling conclusions to be drawn on the type and frequency of recreational activities undertaken and, most importantly, confirming whether core recreational catchments have changed over time.
- 6.10 A follow up survey (Solent SANGs Visitor Survey⁸⁶) was undertaken in the winter of 2021/22 by Footprint Ecology at five inland Suitable Alternative Natural Greenspace (SANG) sites along the Solent (namely: Firestone Copse (Isle of Wight), Shoreburs Greenway (Southampton), River Hamble Country Park (Southampton), Alver Valley Country Park (Gosport) and Minerva Heights (Chichester)). Post code data indicates that the sites are generally used by people in a relatively local and small catchment with little overlap between them. This suggests that there is potential for further SANGs to “fill in the gaps”. Usage figures appear to be increasing significantly from previous surveys in 2015/16 although an element of caution needs to be applied to the data.
- 6.11 The Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar are most likely to be affected by the PLP, given they directly adjoin the authority. Footprint Ecology’s survey covered two access locations in the Portsmouth Harbour SPA / Ramsar (Salterns Quay, Hilsea) and three survey points in the Chichester and Langstone Harbours SPA / Ramsar (Langstone, West Itchenor, Hayling Billy Trail). It is considered that these are the locations most likely to be relevant for new Portsmouth residents. The visitor survey results for these locations are summarised in the following.
- 6.12 In terms of visitor numbers, survey points in the Portsmouth Harbour SPA / Ramsar were less busy than survey locations in the Chichester and Langstone Harbours SPA / Ramsar. For example, Hayling Billy Trail (on Hayling Billy Island, a total of 275 people counted over a 16-hour period) was twice as busy as Hilsea and three times as busy as Salterns Quay. Notwithstanding this, although experiencing a lower overall recreational footfall, a higher number of dogs was recorded in the Portsmouth Harbour SPA / Ramsar. This is noteworthy because dog walkers are likely to represent the most significant disturbance factor to the SPA / Ramsar bird interest.
- 6.13 A total of 334 interviews were conducted with visitors, giving important insight in their recreational habits and distance travelled from home. Notably, a total of 316 visitors (95%) were on a day trip / short visit from home (100% in the Portsmouth Harbour SPA / Ramsar), indicating that the recreational burden in the Solent is mainly driven by local residents rather than holiday makers. 66% of interviewees were dog walking, followed by 21% that were walking and 4% that were on an outing with their family. Very few interviewees were undertaking fishing, beach activities or ‘other’ activities (e.g. beachcombing). As evident from visitor surveys in many other Habitats protected sites, dog walking is generally carried out for relatively short durations (54% of dog walkers stay on site between 30 minutes and 1 hour), but on a regular basis (48% of dog walkers visit daily). Other – arguably more ‘niche’ activities – are undertaken infrequently (i.e. a few times per month) but often involve visits of three hours or more. Therefore, a clear discrepancy exists in the spatio-temporal footprint of recreational activities, which is important from an HRA perspective. Recreational pressure in the Solent continues to appear to be a year-round issue, with the majority of visitors indicating they visit equally all year. Proximity to home clearly is an important factor, because most visitors (particularly those visiting the Portsmouth Harbour SPA / Ramsar) travel to the site on foot and cite ‘close to home’ as one of the most important reasons for site choice.
- 6.14 Overall, 321 interviewees (96%) gave full, valid postcodes that were georeferenced in GIS. The distance from the home postcode to the interview location ranged from 76m to 300km, with a mean of 8.4km and a median of 1.6km. Pooled for all recreational activities and across all survey locations, the 75th percentile of visitors travelled 5km to the relevant survey location. However, when the postcode data was split by survey location, differences in the catchment zones for the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar became apparent. Survey locations in the Portsmouth Harbour SPA / Ramsar had a particularly local visitor pool (75th percentiles of 1.4km and 0.5km respectively). The Chichester and Langstone Harbours SPA / Ramsar had comparatively larger catchment zones of up to 17.1km at West Itchenor.

⁸⁶ [Saunders, P. et al. - 2022 - Solent SANGs Visitor Survey.pdf \(footprint-ecology.co.uk\)](#)

- 6.15 An assessment of the type, capacity and situation of parking locations was also undertaken. This is important because the availability of parking is likely to have a large effect on the distribution of recreational pressure across the Solent region. Two of the routes surveyed, routes 4 (Portchester & Portsmouth) and 5 (Hayling Island), are especially relevant to residents from Portsmouth City. Parking locations providing access to the Portsmouth SPA / Ramsar (route 4) had the highest mean % of 'fullness' of all car parks surveyed in the study. One of the key take-home messages from the study is that Habitats sites in the Solent (particularly in the southern part of Portsmouth City around Southsea) are served by numerous large and well-maintained car parks. This illustrates the popularity of the Solent region for recreation. However, it is to be noted that many of the tarmacked formal car parks in Portsmouth City lie in southern areas that do not provide easy access to the Portsmouth Harbour SPA / Ramsar.
- 6.16 Most recently, in 2023 an initial investigation was undertaken into whether breeding birds associated with the Solent Habitats sites (namely Mediterranean gull, sandwich tern, common tern, little tern and roseate tern) were also sufficiently vulnerable to recreational disturbance that specific mitigation measures may also be required to address summer visitors. This is still being considered by the Partnership for South Hampshire but it is assumed for the purposes of this HRA that if such measures are needed they could be addressed through an expansion of Bird Aware Solent into the summer and through the incorporation of measures specific to these nesting species informed by an uplift to the tariff currently charged.
- 6.17 The impact pathway recreational pressure was previously also assessed in the HRA of the adopted Portsmouth Local Plan, in-combination with the plans of surrounding authorities. It determined that there would not be adverse effects on the integrity of the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar, given that measures were introduced to mitigate recreational pressure in the Solent.

Existing Mitigation in the Portsmouth Local Plan

- 6.18 Chapter 5 of the emerging PLP acknowledges Portsmouth City's unique natural environment and biodiversity. The text in this chapter refers to the Portsmouth and Langstone Harbours and the Solent's coastal waters as being protected by several overlapping national and international nature designations. Policy PLP43 (Recreational Disturbance on International Nature Designations) explicitly requires development proposals to be in line with the existing strategic mitigation framework in place to mitigate recreational pressure in the Solent. This would include the requirement for site promoters and developers to contribute towards access management and monitoring as detailed in the Bird Aware project.
- 6.19 In addition, policy PLP39: Biodiversity specifies that for 'Development proposals with the potential to impact alone or in combination on one or more international sites(s) will be subject to a HRA... Development proposals that will result in any adverse effect on the integrity of any international site will be refused unless it can be demonstrated that:
- there are no alternatives to the proposal;
 - there are imperative reasons of overriding public interest why the proposal should nonetheless proceed;
 - and adequate compensatory provision is secured.'

Conclusions and Recommendations

- 6.20 AECOM considers the high-level protection already included in Policy PLP9 of the emerging PLP to be sufficient to mitigate further recreational pressure effects in the Solent's Habitats sites. Even if the Bird Aware Solent project is expanded to encompass tern and gull nesting sites during the summer, this could still be facilitated through the same mitigation framework and policy. The mitigation strategy has been devised to buffer the Solent region from recreational pressure effects arising from future housing growth in the region. Therefore, the growth allocated in the PLP would have been factored into the decision-making process of the suite of mitigation measures included in the Bird Aware Solent Recreation Mitigation Strategy. Considering that the Local Plan formalises the requirements of the SRMS, it is concluded that the PLP will not result in adverse effects on the integrity of Solent's Habitats sites regarding recreational pressure. No further policy / supporting text is recommended for inclusion in the Local Plan.

Loss of Functionally Linked Habitat

6.21 The SPAs / Ramsars surrounding the Portsmouth City island are all designated for qualifying waterfowl and wader species that are mobile. This means that any of the qualifying species may routinely roost or forage beyond the designated site boundary. Some of the terrestrial wader and brent goose sites may be visited frequently and / or support significant abundances of species. Such sites are considered to support the functionality and integrity of Habitats sites and are therefore extended the same level of protection. The extent to which different species use functionally linked habitats differs considerably. Of the species overwintering in the Solent, the dark-bellied brent goose is the species most tightly linked with off-site habitats such as grassland. The dark-bellied brent goose is a qualifying species of all SPAs / Ramsars in the Solent, including the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent & Southampton Water SPA / Ramsar. To avoid repetition, the following Appropriate Assessment therefore combines the discussion for all these sites.

Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar and Solent & Southampton Water SPA / Ramsar

6.22 The dark-bellied brent goose *Branta bernicla bernicla* is a species of high international conservation importance and is regarded as vulnerable because its small world population has a highly variable breeding success. Over winter, the UK supports approximately 98,100 of these geese, which concentrate primarily in southern and eastern England. The Chichester and Langstone Harbours SPA / Ramsar in particular supports about 13% of the national and 6.5% of the international population.

6.23 Traditionally, brent geese feed on coastal mudflats, where they primarily forage on eelgrass, *Zostera* spp., marine algae (e.g. *Enteromorpha* spp.) and sea lettuce *Ulva lactuca*. However, since the 1950's, have extended their foraging areas to terrestrial habitats, including farmland (comprising cereals and pasture) and amenity grassland. These terrestrial foraging sites are of critical importance to the geese as their nutritional requirements cannot be met by natural resources alone. Partly this has been attributed to the loss of natural inland habitat to urban and agricultural development. The use of terrestrial foraging habitats is greatest during high tide and in years with high numbers of juveniles, seeking to avoid competition with older individual in the mudflats.

6.24 The Solent coastline also provides an important wintering area for wader species, with an average of 90,000 waders annually. Most waders generally feed on invertebrates (e.g. worms and molluscs) in the intertidal zone. During high tide, waders occupy roosting sites, which may include saltmarsh areas, shingle banks, coastal grasslands and man-made structures, such as piers, wharfs and jetties. Wader roosting sites tend to be relatively close to the coast, up to approx. 100m from the mean high-water line, and generally lie away from sources of disturbance. Overall, the dependence of waders on functionally linked habitat is much lower than that of brent goose. However, the development of relatively undisturbed coastal grassland could still result in the loss of crucial supporting habitat.

6.25 Pressure from urban development, recreational use, sea level rise, coastal squeeze from flood defences and coastal re-alignment is continuing to put supporting habitats of Solent wildlife at risk. The Solent Waders and Brent Goose Strategy (SWBGS) was established in 2010 and updated in 2020, identifying the key off-site foraging and roosting resources of Solent's SPA / Ramsar birds. The strategy intends to provide the key resource for assessing in-combination effects of development plans on the network of supporting sites across the Solent. As the strategy stipulates, its evidence 'contributes to the baseline data for associated Habitats Regulations Assessments'. A total of 1,036 sites identified in the Solent.

6.26 As highlighted earlier in this HRA, Portsmouth City is an already developed conurbation with limited space and it is therefore unlikely that many large greenfield sites will be allocated for development. Many of the remaining greenfield sites (e.g. Milton Common, Great Salterns Recreation Ground) are designated open spaces and will be protected from development. Development of greenfield sites is most likely to pose a risk at Tipner, which comprises some tracts of more open grassland on the former ranges. Several strategic sites are proposed, and these are assessed below. Depending on the geographic location of the strategic sites, further protective policy wording may be required in the PLP.

Tipner and Horsea Island East (Policy PLP3), Tipner East (Policy PLP4) and Horsea Island Open Space (PLP9)

- 6.27 Tipner West and Horsea Island East is intended to deliver between 814 and 1,250 dwellings, and 58,000m² of employment uses. Policy PLP3 also allocates land for a bridge between Tipner West and Horsea Island East, flood defences and community meeting spaces. Tipner East (PLP4) will deliver 1,056 residential dwellings, a new transport hub and community/commercial uses. Horsea Island Open Space (PLP9) will deliver open space and associated infrastructure and a segregated busway / cycle and pedestrian link between Tipner West and Port Solent.
- 6.28 All supporting habitats for SPA / Ramsar waterfowl / waders have been mapped as part of the SWBGS and are available online. A review of the SWBGS mapping indicates that several functionally linked habitats lie in the Tipner area.
- 6.29 A Low Use Area (LUA) and one Secondary Support Area (SSA) are located in Tipner East (P136 and P139). Furthermore, two additional LUAs lie within 100m of the Tipner East allocation boundary (P38, P39). The development on this site has already been consented, subject to legal agreements, including the mitigation for loss of functionally-linked habitat. Tipner West and Horsea Island East encompasses two Primary Support Areas (PSA) at Tipner Range (P60) and parcel P76. Furthermore, Core Area P75 lies within 100m of Tipner West and Horsea Island East allocation. All functionally linked habitat parcels lie in close proximity to the Portsmouth SPA / Ramsar, indicating they are likely to be preferentially used by SPA / Ramsar waterfowl in order to minimise energy expenditure. Delivery of Policy PLP3 would also likely result in the loss of the Tipner Range (Primary Support Area P60) and may involve some loss of Primary Support Area P76, which are both functionally linked to SPAs / Ramsars in the Solent.
- 6.30 Tipner West & Horsea Island East (PLP3) is the only allocation where mitigation for loss of functionally linked habitat will be required but where a specific mitigation land parcel has not yet been selected. Overall, the available habitat mapping clearly indicates that development in the wider Tipner and Horsea Island area has the potential to disrupt the local network of supporting habitats. In line with the requirements of the SWBGS any loss of identified supporting habitat would need to be mitigated through the provision of replacement supporting habitat of equal or greater quality. This includes any loss of parcel P60 as well as the other areas of functionally linked land identified above at Tipner West. Policy PLP42 states that *'Proposals that impact the functionally linked sites [Used by Solent Waders and Brent Geese] will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy.'* The supporting text for policy PLP3 (PLP3.6.b) states that the applicant must 'demonstrate that any loss of functionally linked habitat, including that identified as a primary or secondary support area in the Solent Waders and Brent Goose Strategy, will be mitigated through the provision of replacement functionally linked supporting habitat of equal or greater quality and quantity, which fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds' By the nature of the policy wording, the development proposal could therefore not result in the loss of functionally linked habitat, either because the development would be planned out in such a way as to preserve these areas, or because they would deliver adequate offsetting for any loss in line with the Solent Wader and Brent Goose Strategy.
- 6.31 The supporting text for Policy PLP3 confirms the requirements to deliver adequate off-setting in line with the Solent Wader and Brent Goose Strategy. It states:

"The project level HRA should also address the impact of development on functionally linked habitats. It is likely that there will be a loss of habitat that is functionally linked to Solent's SPAs / Ramsars namely Primary Support Areas P60 and P76, as identified in the Solent Waders and Brent Goose Strategy. Furthermore, Core Area P75 lies within 100 metres of the allocation boundary. Core Areas and Primary Support Areas are functionally linked land that contribute to the integrity of SPA/Ramsar sites. All functionally linked habitat parcels lie in close proximity to the Portsmouth SPA/Ramsar, indicating that they are likely to be used by SPA/Ramsar waterfowl in order to minimise energy expenditure. Non-breeding bird surveys between October and March (typically two survey seasons) will be required to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity.

All loss of this functionally linked land should be mitigated in line with Policy PLP42: Solent Waders and Brent Geese Sites and the Mitigation and Off-setting Requirements set out in the Solent Waders and Brent Goose Strategy and to the satisfaction of the local planning authority and Natural England. The planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity."

- 6.32 The requirement for detailed survey work exists to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity. A specific mitigation parcel for delivering new functionally linked habitat cannot be identified prior to that work. However, in developing mitigation and compensation solutions for the effects of Policy PLP3 on Portsmouth Harbour SPA/Ramsar site the site promoters have identified parcels totalling 62ha for terrestrial habitat creation, including as functionally-linked land, to offset the combined loss of area of P60 and P76 (c. 7ha).
- 6.33 At this stage, the parcels identified by the promoter as potential mitigation/compensation are commercially confidential. AECOM and members of the Council's LPA team have, however, been permitted to review those parcels for the purposes of this HRA and are satisfied that there is sufficient suitable and available land to mitigate any loss of functionally linked habitat. Which parcel or combination of parcels is used will depend on the nature and extent of any functionally linked habitat loss arising as a result of a planning application. Such an application will need to be accompanied by project-level HRA which demonstrates the provision of adequate mitigation.
- 6.34 The Council as LPA is working with the promoter team to explore what information about the suitable and available sites can be made publicly available and how the Secretary of State, PINS and relevant statutory consultees can receive information about those sites, potentially on a confidential basis.
- 6.35 Horsea Island Open Space (PLP9) encompasses three Core Areas (P48A, P48B, and P75) and one Primary Support Area (P48C) which could be affected by development or changes in use. This is recognised in Policy PLP 9 which states that *'The Western portion of the site and the small southern portion of the site are Core Areas P48A/P48B and P75 protected for Brent Goose and Waders, the Eastern portion of the site as shown on figure 4.9 is also a Primary Support area P48C for Brent Goose and Waders. Proposals will need to comply with Policy PLP 42 of this plan and take account of the guidance set out in and the Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements'*.
- 6.36 Considering that the Local Plan includes necessary requirements with regard to Solent Waders and Brent Goose Strategy, and there is sufficient suitable and available land capable of delivering mitigation for these allocations (PLP3 being the only allocation for which specific a mitigation site has not yet been confirmed), it is concluded that the PLP will not result in adverse effects on the integrity of Solent's Habitats sites regarding loss of functionally linked land for policies PLP3, PLP4 and PLP10.

Lakeside North Harbour (PLP5)

- 6.37 The Lakeside North Harbour site is allocated for 50,000m² of office-led floorspace in an existing developed context. The site is surrounded by major roads, including the M27, the M275 and the A27. Notwithstanding this, the allocation boundary is only approx. 150m from the Portsmouth Harbour SPA / Ramsar, providing short flightlines to qualifying birds. The SWBGS mapping data show that a Candidate site (P138) comprising short amenity grassland lies within the south-eastern part of the allocation boundary. Therefore, the provision of employment floorspace in this part of the Strategic Site could lead to the loss of functionally linked habitat. However, Policy PLP42 states that *'Proposals that impact the functionally linked sites [Used by Solent Waders and Brent Geese] will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy.'* By the nature of the policy wording, the development proposal could therefore not result in the loss of functionally linked habitat, either because the development would be planned out in such a way as to preserve area P138, or because they would deliver adequate offsetting for its loss in line with the Solent Wader and Brent Goose Strategy. This is identified in the supporting text for Policy PLP5 which states *'Surveys to be carried out to determine the classification of Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England'*.
- 6.38 Considering that the Local Plan includes necessary requirements with regard to Solent Waders and Brent Goose Strategy, it is concluded that the PLP will not result in adverse effects on the integrity of Solent's Habitats sites regarding recreational pressure for policy PLP5.

Portsmouth City Centre (Policy PLP6)

- 6.39 Portsmouth City Centre allocation provides 4,158 new dwellings, 20,000m² (Gross) of employment space (1,546m² net) and a 2.9ha park. This area is associated with the Portsmouth City's conurbation. The area does contain parks, including Victoria Park; however, due to their highly disturbed nature and the fact of their urban location, it is concluded that there is no risk for the loss of functionally linked habitat.

Fratton Park and the Pompey Centre (PLP7)

6.40 The area around Fratton Park and the Pompey Centre is allocated for approx. 710 dwellings, expansion of the north stand of the Fratton Park Football Stadium, supporting hotel, conference facilities and small-scale business / commercial uses. However, this strategic allocation lies in the middle of Portsmouth City's conurbation and is an existing brownfield site. Therefore, the site does not comprise suitable foraging / roosting habitat for SPA / Ramsar birds and would involve relatively long flightlines to the Habitats site. Loss of functionally linked habitat is not a risk for this strategic site.

St. James' and Langstone Campus (PLP8)

6.41 The St. James' and Langstone Campus Strategic Site is allocated as a mixed-use development comprising medical, education and community facilities, open space, sheltered accommodation and 417 residential dwellings. Importantly, the allocation lies directly adjacent to the Chichester and Langstone Harbours SPA / Ramsar. As already identified in the supporting text to Policy PLP8 (St. James' and Langstone Campus), the Langstone Campus part of the allocation comprises open space in the form of playing fields and all-weather pitches. The SWBGS identifies these playing fields as a SSA (parcel P25) and a Core Area (CA, P23b). Furthermore, another Core Area (P23A) lies within 100m of the site. The Core Areas are of highest importance to overwintering SPA / Ramsar birds. The supporting text for Policy PLP8 specifically states that *'Development must retain, where possible, playing pitches and fields'*, while Policy PLP42 states that *'Proposals that impact the functionally linked sites [Used by Solent Waders and Brent Geese] will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy.'* By the nature of the policy wording, the development proposal could therefore not result in the loss of functionally linked habitat (although see other impact pathways in relation to the site – disturbance in functionally linked habitat).

6.42 The playing fields have a baseline level of human activity to which birds using the playing fields can be assumed to be adapted. However, a significant increase in the recreational usage of these playing fields as a result of the development could result in effective loss of functionally-linked habitat if it occurs at times or in locations that are incompatible with use by SPA birds. Therefore, any planning application for the redevelopment will need to consider this issue in a project-level HRA.

Land West of Portsdown Technology Park (PLP 10)

6.43 The Portsdown Hill area is one of the largest open spaces in Portsmouth City, stretching along the northern edge of its boundary. Policy PLP10 (Land West of Portsdown Technology Park) is primarily tailored to protect the landscape, ecological and heritage value of the area. Land is allocated for the provision of 12,500m² of employment floorspace, However this development is restricted to existing brownfield sites in the area. Review of SWBGS data indicates that there are no identified supporting habitats within the boundary of the Site, the closest one being a Candidate Site (W03G) approx.. 408m to the north of Portsdown Hill. While comprising semi-natural grassland, the habitats on Portsdown Hill are unlikely to be suitable for SPA / Ramsar birds due to the relatively steep gradients involved. In conclusion, it is unlikely that development proposals on Portsdown Hill will result in the loss of functionally habitat.

Port Solent (PLP 11)

6.44 Policy PLP11 (Port Solent) allocates land for the development of 500 residential dwellings and marine related uses. Review of SWBGS data indicates that there are no identified supporting habitats within the boundary of the Site. Two Core Areas (P48A, P48B) and one Primary Support Area (P48C) are located within 100m of the allocation. In conclusion, it is considered unlikely that development proposals for Port Solent will result in the loss of functionally habitat.

St John's College (PLP 12)

6.45 Policy PLP12 (St John's College) allocates land for the development of 212 residential dwellings. However, this strategic allocation lies in the middle of Portsmouth City's conurbation and is an existing brownfield site. Therefore, the site does not comprise suitable foraging / roosting habitat for SPA / Ramsar birds and would involve relatively long flightlines to the Habitats site. Loss of functionally linked habitat is not a risk for this strategic site.

Fraser Range (PLP 13)

6.46 Policy PLP13 (Fraser Range) allocates land for the development of 134 residential dwellings, new sea wall flood defences, parking, an access road and landscaping. Review of SWBGS data indicates that one Primary Support Area (P142) and one Low Use Area (P144) at least partially overlap with the allocation. Any loss of identified supporting habitat would need to be mitigated through the provision of replacement

supporting habitat of equal or greater quality. Overall, the available habitat mapping indicates that development of the Fraser Range site has the potential to disrupt the local network of supporting habitats.

- 6.47 However, Policy PLP42 states that ‘Proposals that impact the functionally linked sites [Used by Solent Waders and Brent Geese] will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy.’ By the nature of the policy wording, the development proposal could therefore not result in the loss of functionally linked habitat, either because the development would be planned out in such a way as to preserve area P142, or because they would deliver adequate offsetting for its partial loss in line with the Solent Wader and Brent Goose Strategy.
- 6.48 Supporting text for Policy PLP13 confirms the requirement for the developer to provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent’s SPAs / Ramsars (P142 / P144). It is understood that an offsetting mitigation package is currently being agreed with Natural England and Portsmouth Council for Fraser Range as part of the current application and that Fort Cumberland Open Space will be used for mitigation. The application is still under discussion but based on information available the authors of the HRA are satisfied that a solution to mitigate any loss of functionally linked habitat will be identified.

The News Centre, Hilsea (PLP 14)

- 6.49 Policy PLP14 (The News Centre, Hilsea) allocates land for the development of an electric bus depot and 100 residential dwellings. The policy emphasises the heritage value of the area. Review of SWBGS data indicates that there are no identified supporting habitats within the boundary of the Strategic Site, the closest one being a PSA (P43) approx.. 200m to the west of the Site. In conclusion, it is unlikely that development proposals for The News Centre, Hilsea will result in the loss of functionally habitat.

Somers Orchard (PLP 15)

- 6.50 Policy PLP15 (Somers Orchard) allocates land for the development of 565 residential dwellings (292 net new dwellings), approximately 500sqm commercial space and approximately 440sqm community space. However, this strategic allocation lies in the middle of Portsmouth City’s conurbation and is an existing brownfield site. Therefore, the site does not comprise suitable foraging / roosting habitat for SPA / Ramsar birds and would involve relatively long flightlines to the Habitats site. Loss of functionally linked habitat is not a risk for this strategic site.

Existing Mitigation in the Portsmouth Local Plan

- 6.51 General protection to functionally linked habitats is given in Policy PLP39 (Biodiversity). This policy states that ‘Development proposals will be permitted where they conserve and enhance biodiversity, giving particular regard to ecological networks... b) Contribute to the creation of larger improved wildlife habitats through the creation of linkages between sites to create and enhance local and regional ecological networks’. By definition, functionally linked habitat parcels are part of the city’s ecological network and are thus included by this wording.
- 6.52 Policy PLP42 of the Local Plan states that ‘Proposals that impact the functionally linked sites [Used by Solent Waders and Brent Geese] will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy.’ By the nature of the policy wording, the development proposals could therefore not result in the loss of functionally linked habitat, either because the development would be planned out in such a way as to preserve areas of functionally-linked habitat, or because they would deliver adequate offsetting for its loss in line with the Solent Wader and Brent Goose Strategy.
- 6.53 This requirement is reflected in relevant allocation policies:
- Policy PLP3 (Tipner West and Horsea Island East) states that the developer must ‘*demonstrate that any loss of functionally linked habitat, including that identified as a primary or secondary support area in the Solent Waders and Brent Goose Strategy , will be mitigated through the provision of replacement functionally linked supporting habitat of equal or greater quality and quantity, which fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds*’.
 - PLP4 (Tipner East) states that ‘Any loss of supporting habitat identified in the Solent Waders and Brent Goose Strategy will be mitigated through the provision of replacement supporting habitat of equal or greater quality and quantity that fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds’.

- Policy PLP5 (Lakeside North Harbour) states ‘Surveys to be carried out to determine the classification of Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England’.
 - Policy PLP8 (St James and Langstone Campus) specifically states that ‘Development must retain, where possible, playing pitches and fields’, and ‘The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked (Core Area P23B, Secondary Support Area P25) to Solent’s SPAs / Ramsars’ while Policy PLP42 states that ‘Proposals that impact the functionally linked sites [Used by Solent Waders and Brent Geese] will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy’.
 - Policy PLP 9 (Horsea Island Open Space) states that ‘The Western portion of the site and the small southern portion of the site are Core Areas P48A/P48B and P75 protected for Brent Goose and Waders, the Eastern portion of the site as shown on figure 4.9 is also a Primary Support area P48C for Brent Goose and Waders. Proposals will need to comply with and Policy PLP 42 of this plan and take account of the guidance set out in and the Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements’.
 - Policy PLP13 (Fraser Range) states ‘The developer will provide mitigation of any alone impacts on the habitat that is functionally linked to Solent’s SPAs / Ramsars (P78 / P142 / P144). This is in addition to the contributions provided through the Solent Recreation Mitigation Strategy’ and ‘To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent’s SPAs / Ramsars (P78/P142 / P144).’
- 6.54 The 2020 update to the SWBGS identifies the mitigation and off-setting requirements for functionally linked habitat parcels in the Solent. Core Areas (CAs) in particular are considered essential to the ecological network and integrity of SPAs / Ramsars. The report specifies that any development proposals resulting in long-term impacts on or the loss of CAs, must be offset by provision of a suitable replacement site of equal or greater size and quality near to the affected CA. Primary Support Areas (PSAs) make an important contribution to maintaining the integrity of the ecological network and also require a like-for-like replacement, ‘operational’ at the time that the original PSA is lost / impacted. All areas identified as functionally-linked habitat should be mitigated where necessary. The SWBGS Steering Group mitigation document also details other parameters that replacement sites should satisfy (e.g. type of habitat, not affected by recreational pressure).
- 6.55 As part of survey work for individual applications, non-breeding bird surveys between October and March (typically two survey seasons) will be required to inform the development of detailed mitigation for loss of functionally-linked habitat and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.
- 6.56 Given the policy wording included in the Local Plan it is considered that an appropriate policy framework exists to address loss of functionally-linked land.

Recreational Pressure in Functionally Linked Habitat

Portsmouth Harbour SPA / Ramsar and Chichester and Langstone Harbours SPA / Ramsar

- 6.57 Recreational activities may not only result in disturbance in the SPAs / Ramsars themselves, but also in habitat that is functionally linked to these sites. As established in the previous section, functionally linked habitats are integral in maintaining the coherence of Solent’s ecological networks. Human activities that alter / reduce the birds’ use of supporting habitats would also be considered to result in adverse effects on Habitats sites. Not all parcels of supporting habitat are accessible or attractive as recreation destinations. Therefore, supporting habitats require individual appraisal (ideally supported by visitor monitoring data) and, if found to be significantly affected by recreation, also need to be protected through mitigation measures.
- 6.58 In this section, functionally linked habitats are assessed in their order of importance, namely Core Areas (CAs), Primary Support Areas (PSAs) and Secondary Support Areas (SSAs), with a particular focus on

public access. Table 4 provides an analysis of each functionally linked habitat with shadings of green, yellow and orange based on the conclusions of the assessment. Parcels P23R, P48A, P48B (all CAs) and P48C (PSA) are shaded green because there is little to no potential for the Local Plan to result in recreational disturbance in these sites. These parcels, while unfenced, are distant from areas of housing and / or separated from housing by major roads.

- 6.59 SWBGS parcels P08A, P08C, P11, P12, P23B, P29, P32A, P52, P54 (all CAs), P19D, P40A, P43, P140 (all PSAs), P19B, P25 and P32B (all SSAs) are shaded yellow because a realistic potential for public access is present, although the potential for any significant increase in recreational pressure due to the Local Plan is limited. Most of these parcels comprise sports pitches, playing fields or parts of golf courses. Any such sites are likely to have a carrying capacity of usage. This implies that regardless of the population growth due to the Local Plan, there will be a maximum number of recreationists using these sites at any one time (and indeed some of these sites may already have reached a 'ceiling' of recreational use). Furthermore, for any sports pitches, periods of usage will be interspersed by days when no recreational activities would be undertaken. Any disturbance will exhibit temporal variation, allowing SPA / Ramsar birds to use the pitches at times when no disturbance is present.
- 6.60 Parcels P20, P23A, P31, P35 (all CAs), P40, P78, P142, P148 (all PSAs) and P127 (SSA) are shaded orange, because there is a realistic potential that population growth could result in increased recreational activity. This is because these parks, commons, amenity grassland and sandflats offer unrestricted public access in proximity to extensive existing areas of housing. It is to be noted that while a potential for disturbance impacts to SPA / Ramsar birds exists, many of the above parcels (e.g. P35, Southsea Common) continue to support good abundances of brent goose year-on-year despite existing high levels of recreational use. Therefore, an increase in recreational usage does not necessarily imply reduced suitability for SPA / Ramsar birds.
- 6.61 Moreover, of the parcels highlighted orange, only two are in close proximity to an allocation in the Portsmouth Local Plan. P23A is close to allocation PLP8 St James and Langstone Campus. This Local Plan HRA has already identified that the allocation has extensive playing fields within it (Parcel P25) and that a significant increase in the recreational usage of these playing fields as a result of the development could result in effective loss of functionally-linked habitat if it occurs at times or in locations that are incompatible with use by SPA birds. Therefore, any planning application for the redevelopment will need to consider this issue in a project-level HRA. The same is true for parcel P23A. Recreational pressure stemming from this allocation is covered by the adopted Milton Common Mitigation Framework (February 2022). Parcel P40 is close to PLP4 Tipner East, but this development already has planning consent.
- 6.62 At a strategic level across Portsmouth, **Policy PLP9 (Horsea Island Open Space)** allocates 64ha of strategic public open space in the west of Portsmouth City. The new open space provision will consider the needs of its intended users and provide multi-functional spaces. It is noted that this will provide additional recreational opportunity and reduce the future recreational burden on the supporting habitat parcels discussed above.
- 6.63 Overall, it is considered that the emerging PLP will not result in adverse effects on supporting habitats through increased recreational pressure. This is due to the existing recreational usage of these land parcels not impacting on their ability to support SPA / Ramsar bird species and the provision of 64ha of new strategic open space on Horsea Island.

Table 4: Discussion of functionally linked habitat SWBGS parcels in relation to recreational pressure. Note that the three shading bands are discussed further in the main body of text.

| Type of supporting habitat | Site Code | Site Description | Nature of Recreational Pressure |
|----------------------------|-----------|--|--|
| Core Area | P08A | Farlington Playing Field and Cricket Grounds | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P08C | St John's College Playing Fields | Public access, with periods of high recreational usage likely |

| Type of supporting habitat | Site Code | Site Description | Nature of Recreational Pressure |
|----------------------------|-----------|---|---|
| | | | to be interrupted by days without access |
| | P11 | Baffins Milton Rover FC | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P12 | Great Salterns Golf Course | Daily public access likely, with golfing usage likely to be lower in winter compared to summer. |
| | P20 | Tangier Park comprising amenity grassland | Park with daily recreational usage in close proximity to local housing. |
| | P23A | Swan Lake and adjoining semi-improved grassland | This site forms part of Milton Common, which is likely to be subject to daily recreational usage from nearby housing |
| | P23B | Sports pitches forming part of the University of Portsmouth Langstone Sports Site | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P23R | Some semi-improved grassland (being partially developed) to the south of Eastern Road | While not fenced, this site is separated from the nearest housing by Eastern Road. No safe crossing for pedestrians available. Little potential for recreational disturbance. |
| | P29 | Cockleshell Community Sports Club | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P31 | Amenity grassland to the south of Clocktower Drive | Regular recreational pressure likely, with free public access from the north of Clocktower Drive |
| | P32A | Portsmouth Cricket Club | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P35 | Southsea Common comprising amenity grassland | Regular high levels of recreational pressure likely due to public access and close proximity to residential development |
| | P48A | Amenity grassland adjacent to Port Solent | No perimeter fencing and, therefore, potential public |

| Type of supporting habitat | Site Code | Site Description | Nature of Recreational Pressure |
|----------------------------|-----------|--|--|
| | | | access. However, distant from the nearest residential housing. |
| | P48B | Amenity grassland adjacent to Port Solent | No perimeter fencing and, therefore, potential public access. However, distant from the nearest residential housing. |
| | P52 | Amenity grassland adjoining Portsmouth College | Freely accessible by students of Portsmouth College. |
| | P54 | Recreational pitch with amenity grassland | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| Primary Support Areas | P19D | Great Salterns Lake within golf course | Daily public access likely, with golfing usage likely to be lower in winter compared to summer. |
| | P40 | Alexandra Park, comprising sports pitches and amenity grassland | Public access with regular recreational visits from nearby housing |
| | P40A | Portsmouth Athletic Club | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P43 | Hilsea Bastion Gardens and Portsmouth Grammar School Playing Field | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P48C | Gently undulating semi-improved grassland to the south-east of Port Solent | Separated from housing by the M27 and M275 motorways. No public access due to the site being part of the Paulsgrove Household Waste Recycling Centre |
| | P78 | Supralittoral sand at Eastney Beach | Public access with regular high levels of recreational pressure from nearby housing |
| | P140 | Portsmouth Royal Marines Sports Complex | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P142 | Intertidal sandflat at Eastney Beach | Public access with regular high levels of recreational pressure from nearby housing |

| Type of supporting habitat | Site Code | Site Description | Nature of Recreational Pressure |
|----------------------------|-----------|--|--|
| | P148 | Sports pitches forming part of Stamshaw Adventure Playground | Public access with regular recreational visits from nearby housing |
| Secondary Support Areas | P19B | Great Salterns Golf Course | Daily public access likely, with golfing usage likely to be lower in winter compared to summer. |
| | P25 | University of Portsmouth Langstone Student Village, comprising sports and playing fields | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P32B | Portsmouth Cricket Club and adjoining golf course | Public access, with periods of high recreational usage likely to be interrupted by days without access |
| | P127 | Semi-improved grassland adjoining Eastney Pier | Public access with regular recreational visits from nearby housing and Ferry Road Car Park |

Disturbance from Construction

- 6.64 There is abundant research in the literature highlighting the impacts of construction processes on bird species. A study conducted by the British Trust for Ornithology highlighted that different types of construction work significantly reduced the densities of five waterfowl species, including Eurasian teal, Eurasian oystercatcher, dunlin, Eurasian curlew and common redshank, up to several hundred metres from the source of disturbance. A more recent study found that the construction of wind farms had greater impacts on bird populations than their subsequent operation. Therefore, any construction work carried out as part of the emerging PLP has the potential for disturbing birds.
- 6.65 Research on noise and visual disturbance from construction activities undertaken in the Humber Estuary, indicates that noise disturbance from construction should be limited to below 70 dB as waterfowl in a busy estuarine environment are able to habituate to such noise levels. Furthermore, the noise from the most disturbing construction works, such as impact piling, recedes to below disturbing levels approx. 100m from the source. However, despite this general noise threshold, specific regard should be given to the sensitivity of individual species. For example, redshank and brent geese, both qualifying species of SPA / Ramsar sites in the area of the Seafront Masterplan, are highly sensitive to noise disturbance and caution is advised for any noise levels above 55 dB.
- 6.66 The potential for visual disturbance differs markedly between species and the type of activity undertaken by birds. For example, redshank respond to visual stimuli at 250m of open distance, while brent geese react to visual stimuli only to approx. 105m distance when feeding. However, when roosting, the tolerance of brent geese reduces and the distance at which they respond to a visual stimulus increases to 205m. Overall, the evidence base highlights that the qualifying species of both the Portsmouth Harbour SPA / Ramsar, and the Chichester and Langstone Harbours SPA / Ramsar are vulnerable to the effects of visual and noise disturbance.
- 6.67 Due to their proximity, both the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar require consideration. However, construction disturbance in functionally linked habitats also requires appraisal, as such habitats are important in maintaining Solent's ecological network.

- 6.68 The PLP contains a series of broad Strategic Allocations, which account for a considerable amount of development coming forward to 2040. The following sections provide an assessment of these Strategic Allocations in relation to construction disturbance. Note that detailed noise modelling (for example) cannot be undertaken at this level as it requires detailed knowledge of the development programme, layout and construction methods which will not be available until the individual planning applications are developed.

Portsmouth Harbour SPA / Ramsar

- 6.69 Given it borders directly onto the Portsmouth Harbour SPA / Ramsar, the Tipner Strategic Allocation (PLP3) is most likely to cause visual and noise disturbance in the SPA / Ramsar, with PLP4 (Tipner East) also providing considerable potential for construction disturbance given its proximity to the SPA/Ramsar. The proposal for Tipner West also involves land reclamation as well as a bridge from Tipner to Horsea Island, both of which will involve construction works within the SPA / Ramsar. Therefore, strategic development at Tipner generally has a high disturbance potential for SPA / Ramsar waterfowl.
- 6.70 The Lakeside North Harbour is a Strategic Allocation that lies to the north of Portsea Island, approx. 200m from the nearest part of the Portsmouth Harbour SPA / Ramsar. It is considered that, over this distance, any construction noise (from the noisiest types of works) would have attenuated to non-disturbing levels, even without using visual or noise mitigation. Furthermore, the SPA / Ramsar in this location is subject to existing high levels of noise from the strategic road network, including the M275, M27 and the A27. Therefore, no visual and noise impacts on the SPA / Ramsar are expected from this allocation.

Chichester and Langstone Harbours SPA / Ramsar

- 6.71 The St. James' and Langstone Campus Strategic Allocation adjoins the Chichester and Langstone Harbour SPA / Ramsar. The current plan for the site indicates that the section of the allocations closest to the SPA / Ramsar will remain open space. However, the closest brownfield component of the site lies only approx. 84m from the SPA / Ramsar. Depending on where new development within the Strategic Allocation is coming forward, there is a risk of visual and noise disturbance to SPA / Ramsar waterfowl / waders.

Functionally Linked Habitat

- 6.72 Due to their importance in supporting SPA / Ramsar waterfowl and waders, potential construction disturbance in functionally linked habitats should also be avoided. The Strategic Allocations identified above in relation to the Habitats sites, are also most likely to cause disturbance in functionally linked habitats during the construction period. For example, construction processes at both Tipner West and East could disturb feeding brent geese in the Primary Support Areas P60, P40A and P40, and the Secondary Support Area P139. There are also three Areas of Low Use within and adjacent to Tipner East (P38, P39, P136). Similarly, construction in the St. James' and Langstone Campus allocation in the east of Portsmouth City is within the screening distance for visual and noise disturbance to the Core Areas P23A and P23B. A Secondary Support Area (P25) lies within the core of the Strategic Allocation.

Existing Mitigation in the Portsmouth Local Plan

- 6.73 The distribution of supporting habitats in relation to the Strategic Allocations suggests that visual and noise disturbance resulting from construction has the potential to result in adverse effects on site integrity unless mitigation measures are adopted. It is noted that the PLP contains high-level policy wording protecting Solent's Habitats sites and off-site supporting habitats. Policy PLP39 (Biodiversity) states... 'Development proposals with the potential to impact alone or in combination on one or more international sites(s) will be subject to a HRA... Development proposals that will result in any adverse effect on the integrity of any international site will be refused unless it can be demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured.'
- 6.74 The supporting text for Policy PLP39 (Biodiversity) includes the following measures:
- It is generally advised that construction work within 100m of relevant SPAs / Ramsars or functionally linked habitats known to support SPA / Ramsar waterfowl and / or waders should avoid the period October to March (inclusive) entirely.

- Where construction works will occur in a precautionary 300m buffer zone around the Habitats sites, an assessment of noise and visual disturbance potential should be undertaken for individual planning applications. Where works may be disturbing and cannot avoid the October to March period, adequate visual and noise screening equipment should be used to shield bird sightlines and buffer them against noise disturbance. Noise shielding should be such that noise levels at receptors are limited to 70 dB (or below); in other words, an 'acceptable' dose of noise is attained at the birds.
 - For any construction works carried out within the Portsmouth Harbour SPA / Ramsar such mitigation measures will be insufficient if the work is undertaken during the core winter/passage period. In such cases, the construction programme should be timed to avoid the October to March overwintering period of qualifying SPA / Ramsar birds. Avoiding this sensitive period will mean that any adverse visual and noise impacts on the Portsmouth Harbour SPA / Ramsar are prevented.
- 6.75 Based on professional experience of many redevelopment projects close to Special Protection Areas, these measures ensure the protection of SPA /Ramsar waterfowl and waders from visual and noise disturbance.
- 6.76 However, given the nature of the development proposals, particularly those aspects of the works within the Portsmouth Harbour SPA / Ramsar, AECOM considers that further detail and specificity is required to adequately protect SPA / Ramsar interest features. These are presented in the next section.

Conclusions and Recommendations

- 6.77 Overall, at the strategic level the policies and supporting text with the Plan provide protection from visual and noise disturbance effects arising from construction.
- 6.78 However, it is recommended that development within the Strategic Allocations is spatially distributed such that any potential visual and noise disturbance is minimised. For example, the St. James and Langstone Campus allocation is relatively large. Focussing much of the (re)development in the western part of the allocation, would minimise disturbance impacts on the supporting habitats P25, P23A and P23B. However, space constraints mean that such an approach clearly is not possible for other Strategic Allocations (e.g. Tipner).

Water Quality

- 6.79 As indicated in the impact pathway and LSEs section, the marine environment surrounding Portsmouth City is sensitive to a decline in water quality. Being a marine environment, the primary growth limiting nutrient is nitrogen, whereas phosphorus is generally considered to be less important. The Solent has recently been designated under section 96C of the Water Industry Act 1991. This is relevant because such designation enables the government to specify the concentration of nitrate that applies to a plant (which discharges into the catchment area) in relation to a nutrient pollution standard instead of the standard concentration. This will contribute to addressing nutrient issues by improving standards at relevant wastewater treatment works. All Habitats sites in the immediate vicinity of Portsmouth City depend on good water quality and the following Appropriate Assessment therefore groups the discussion of the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC. The water quality in the Solent & Southampton Water SPA / Ramsar and the Solent and Dorset Coast SPA is unlikely to be affected by the PLP due to the flow distance, dilution factor and natural attenuation processes involved. These sites were screened out specifically regarding development in the PLP.

Solent & Dorset Coast SPA/Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC

- 6.80 Natural England's Site Improvement Plan (SIP) for the Solent states that water pollution affects a range of habitats and bird species through eutrophication (in the case of birds through cascading effects mediated through the food chain) and direct toxicity. Sources include both point-source discharges (e.g. from flood alleviation / storm discharges and Wastewater Treatment Works; WwTWs) and diffuse nitrogen leaching, such as from agricultural and road surface run-off. Currently, it is now advised that nitrogen and phosphorus concentrations entering the Solent are continuously monitored to identify the scale of nutrient inputs to the marine environment.

- 6.81 A significant portion of the nitrogen loading in the marine environment derives from agriculture, such as from the routine application of fertilisers and other factors (e.g. livestock accessing freshwater bodies). This source is being addressed through several strategic mitigation solutions (e.g. through Defra's Catchment Sensitive Farming initiative and does not lie within the control of Local Planning Authorities (i.e. agricultural land is not usually allocated in Local Plans). However, a smaller, yet in-combination still significant, source of nitrogen is treated sewage effluent from WwTWs. Potential adverse impacts of treated wastewater on Habitats sites are typically prevented through the Review of Consents process undertaken by the Environment Agency. This sets permit limits for water quality parameters (such as nitrogen) in WwTWs discharging to sensitive waterbodies. However, there is growing uncertainty whether future housing and the associated wastewater output can be accommodated without detrimental effects on Habitats sites.
- 6.82 The European Commission urban wastewater website was consulted to identify the most likely WwTW serving Portsmouth City. Judging by its proximity to Portsea Island, sewage effluent from the city is likely to be treated in the Portsmouth and Havant WwTW (Budds Farm). This plant processes sewage from 370,749 people and has more stringent secondary nitrogen treatment in place. The WwTW discharges to the Chichester and Langstone Harbours SPA / Ramsar via an outfall pipe, with potential knock-on impacts on its marine ecosystems. While the WwTW is classified as 'compliant', with pass performances in both primary and secondary treatments, Natural England (NE) advises that abiding by the Review of Consents process may no longer protect the integrity of Habitats sites in the Solent.
- 6.83 NE has introduced a requirement of nutrient neutrality for new developments in the Solent region, including residential dwellings, hotels / holiday accommodation and tourism attractions. This applies to development of all sizes, even one additional dwelling, which could add to the existing nutrient burden in Solent's Habitats sites. NE's advice note (the latest version of which is Version 5 dated June 2020⁸⁷) includes a nutrient neutrality calculation, which needs to be completed for any of the above identified types of development. The entirety of the Portsmouth City island lies within the hydrological catchment of the above Habitats sites and therefore all sites allocated in the emerging PLP will need to be supported by a detailed nutrient budget.
- 6.84 The total demand for nutrients going forward is based upon the supply as set out in table 6.1 (Sources of New Homes in Portsmouth) of the emerging Local Plan. The predicted supply as set out in that table has been used as a starting point. This table does not include all of the sources of supply as set out in table 6.1. The differences are that it does not include completions as these are assumed to have already secured appropriate nitrate mitigation, and it does not include supply from other LPA's secured through the duty to cooperate as nitrates for these schemes will be secured by the relevant LPA.
- 6.85 The following sources of demand have been included:
- Permissions outstanding (as credits are secured on occupation)
 - C3 Housing projections comprising Strategic Sites, Strategic Allocations, Local Plan reg 19 identified sites, and Windfall sites.
 - Houses of Multiple Occupation
 - Other C2 development
- 6.86 In order to estimate the number of credits (measured in kilograms of total nitrogen per year, KgTN/yr) that will be required, assumptions have had to be made on the nitrate requirement for different types of projected development. These results in different per dwelling nitrogen surpluses being applied to the housing figures in order to give the required nitrate surplus in Kg/TN/yr. For housing, a surplus of 0.87 kgTN/yr per dwelling has been applied based upon the latest Solent Nutrient Budget calculator. This ratio has been applied to the following sources of supply: permissions (as schemes do not secure nitrate mitigation until occupation), Local Plan Regulation 19 allocations and windfall sites.
- 6.87 Strategic Sites and allocations have site specific estimates from two sources; where the exact agreed number of credits is known that number is used; where the exact agreed number is not yet established then site specific calculations carried out by the PFSH SEPO team using the Solent Nutrient Budget Calculator are used. The City Council has also written directly to the owners of the Strategic sites and allocations

⁸⁷ <https://www.push.gov.uk/wp-content/uploads/2020/06/Natural-England%E2%80%99s-latest-guidance-on-achieving-nutrient-neutrality-for-new-housing-development-June-2020.pdf>

asking for further detail on how they will meet their nutrient offsetting requirements, the results of this will feed into future updated estimates.

- 6.88 HMO's apply a per dwelling surplus of 0.839 based upon the average of nitrates required for past HMO development, this assumes a need of 0.36 Kg/TN/yr per additional bed spaces as set out in Appendix 2 and 3 of this paper, this is then multiplied by the average uplift in bed spaces per sui generis HMO scheme to give the 0.839 average figure.
- 6.89 Hotels apply a per room surplus of 0.17 kg/TN/yr based upon the calculation set out in appendix 5. This number is lower than HMO and C2 bed spaces as Hotel beds are assumed to have a lower water usage of 55 litres per person per day, as hotel guests will use less water than permanent residents. This is set out in the City Councils updated Nutrient Neutrality Strategy.
- 6.90 These ratios are applied to the 'Sources of New Homes in Portsmouth' data as taken from table 6.1 of the Local Plan. This has resulted in an indicated need for nitrogen credits equivalent to a surplus of 12,464.67 Kg/TN/yr across the Local Plan period.

Mitigation Contained in the Portsmouth Local Plan

- 6.91 The emerging PLP already refers to water quality in the Solent and the concept of nutrient neutrality in Policy PLP44 (Nutrient Neutrality in International Nature Designations). It states that 'Development proposals... will be permitted where they demonstrate through a nutrient budget that they secure Nutrient Neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits or a mixture of these'. This policy text aligns the plan document with Natural England's requirement and places the onus on site promoters to ensure that there will be no net nutrient input to the Solent from future development.
- 6.92 Importantly, the supporting text to Policy PLP44 also provides details on how nitrogen in treated sewage effluent might be mitigated. Portsmouth City Council published an Interim Nutrient Neutral Mitigation Strategy (INNMS) (November 2019) to provide a framework for applicants to meet the Habitats Regulations and to secure mitigation in-perpetuity. The INNMS introduces the concept of mitigation credits generated by water efficiency upgrades to council-owned housing; in other words, it seeks to reduce the volume of sewage effluent. Furthermore, higher water efficiency standards in new development are to become a condition for planning consent. While the INNMS provides an additional measure in the toolkit for protecting the Solent's water quality, the Council acknowledges that this strategy alone will not provide sufficient mitigation for the level of development expected beyond a two-year period.
- 6.93 The PLP also refers to the Partnership for South Hampshire (PFSH), which is in the process of establishing a programme for land use change in the wider Solent region in partnership with the Hampshire & Isle of Wight Wildlife Trust (HIWWT). This will enable site promoters to purchase agricultural land strategically to be managed to reduce nitrogen leaching. Overall, the emerging PLP already refers to the main existing pillars of nitrogen mitigation, implying that any allocated development would not materially contribute to in-combination water quality impacts in the Solent.
- 6.94 Portsmouth City Council has produced an Updated Interim Nutrient Neutral Mitigation Strategy for New Dwellings strategy⁸⁸. This strategy sets out the how development can offset its nutrient impact dependent upon its type and size. The Nutrient Neutral Mitigation Strategy sets out 3 options for provision of Mitigation for nutrients.
- 6.95 The following approaches are currently considered to be acceptable, in principle, as means of achieving or contributing to nutrient neutrality:
- Mitigation Option 1: Offsetting against the existing lawful land use on an application site, extant permissions or other land controlled by the applicant; and/ or
 - Mitigation Option 2: bespoke direct and in-direct mitigation measures, agreed in discussion with the Council and Natural England. For instance, Sustainable Urban Drainage Systems (SUDS), interception or wetland creation; and/ or

⁸⁸ [Updated Nutrient Neutral Strategy post cabinet version-June22.pdf \(portsmouth.gov.uk\)](#)

- Mitigation Route 3: Purchasing of 'mitigation credit' from recognised source of nitrogen mitigation: Purchase of 'mitigation credit' from the Council or other landowner/ recognised source of 'mitigation credit', secured in perpetuity.
- 6.96 A mix of Options can be applied. The purchase of the Council's mitigation credit (Option 3b) will be available to minor development proposals (9 units and below) and Portsmouth City Council development as appropriate.
- 6.97 The City Council has developed a credit bank for the provision of credits in order to enable development. The Portsmouth's 'credit bank' consists of credits purchased by the Council through the Hampshire & Isle of Wight Wildlife Trust mitigation scheme, water efficiency improvements and any PCC assets that become vacant during the life of this Strategy.
- 6.98 As of December 2023, The Council had a total of 1,892.83 nitrates credits in its credit bank. This comprised 1,043 credits from city council water efficiency measures and 849.83 credits outstanding from those purchased from the Hampshire & Isle of Wight Wildlife Trust. The credit bank is a live document, and it should be noted that this position is constantly changing.
- 6.99 The City Council has been retrofitting water efficiency measures on its existing stock for several years, these have resulted in an average of 38.83 credits being created per month. It is expected that this rate will fall over the plan period due to increasing costs as stock becomes more difficult to make efficient due to easy to target properties having already been retrofitted. It is also confirmed that approximately 4,000 of the 15,334 council owned properties across Portsmouth and Havant Boroughs have been made more efficient leaving approximately 11,000 properties as the maximum that could be subject to further water efficiency measures. The water efficiency measures from approximately 4,000 homes to date have resulted in savings equivalent to 1,472 credits. If the remaining Council owned properties (11,000) were also made more efficient, savings equivalent to a further 4,048 credits would be potentially available. Applying a 20% discount to take account of the fact not all properties can be retrofitted results in a total expected credit availability from this source of 3,238.4 credits.
- 6.100 The City Council directs major development to the Hampshire and Isle of Wight Wildlife Trust, who provide credits directly to those site promoters. The Hampshire and Isle of Wight Wildlife Trust has indicated that it currently has agreements to provide credits directly to 10 developments (including Strategic sites/ allocations) in the City providing 1,523.5 KgTN/yr of nitrate offsetting.
- 6.101 Overall these sources of supply are providing credits equivalent to a total of 6,654.73KgTN/yr. When applied to the 20 year plan period to 2040 this gives the equivalent of 10.87 years' worth of nutrient credits available. The City Council may look to explore further sources of credit to improve its supply position. Therefore the City Council expects to have nutrient credits that go well beyond the end of the first five years of the Local Plan period when the Local Plan must be reviewed. Moreover, it is noted that the UK Government is planning to introduce proposals which would limit the need for nutrient neutrality to be delivered at the planning application level, with strategic solutions independent of the planning process taking their place.
- 6.102 Since the PLP is supported by calculations that demonstrate the nutrient surplus and mitigation requirement, and sets out the intended mitigation solution for at least the first 5 year plan period (since Local Plans must in any event be reviewed every 5 years), adverse effects of the plan on the integrity of the Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC regarding water quality can be excluded, in-combination with other plans and projects.

Water Quantity, Level and Flow

- 6.103 The Solent's marine sites are all sensitive to a significant reduction or an excessive increase in the amount of freshwater flowing into the sites. This is for a variety of reasons, such as changes to the salinity, amount of aquatic habitat, sedimentation and dissolved oxygen concentration in the water column. The primary way in which Local Plans tend to affect the volume of water in Habitats sites is through the abstraction of freshwater for potable water supply in new developments. Natural England's SIP highlights hydrological changes as a threat to the Solent. In particular, the SIP refers to Titchfield Haven as having a high level of water abstraction licenses, which could jointly lead to a significant reduction (and adverse effects on site integrity) of the water levels in the SPA / Ramsar and SAC.
- 6.104 Water companies (in this case Portsmouth Water) are responsible for devising long-term water abstraction strategies and the management of water resources. Water Resources Management Plans (WRMPs) are

strategic in nature and affect waterbodies across large spatial scales. Therefore, the Appropriate Assessment for the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC is undertaken jointly in the following section.

Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC

- 6.105 All marine sites in the Solent largely depend on freshwater input from perennial and ephemeral chalk streams and rivers, flowing into the English Channel. Any plans or projects with the potential to alter this hydrological flow may increase or reduce the amount of freshwater received by the Habitats sites. Portsmouth City and the wider geographic area surrounding it, is served by Portsmouth Water. The company's latest WRMP was published in 2019 and provides an appraisal of the options likely to be required to serve the growing population. Generally, water resource options that do not increase the existing consented abstractions or 'exploit' new resources are unlikely to be a threat for the integrity of Habitats sites, as these would have been previously subject to HRA. Instead, proposals for increased abstraction volumes or tapping of previously unused resources, are most likely to be a risk for the hydrological integrity of marine sites. One supply management option that represents a particular issue for marine sites is the desalination of saltwater, which effectively removes marine habitat and alters the aqueous solute balance.
- 6.106 Portsmouth Water supplies an area of 868km² with a population of around 722,000. The company's supply area includes a large section of coastline, comprising several Habitats designated sites. The daily abstraction rate averages approx. 170 MI/d, taken from boreholes, springs and one river in the local Chalk aquifer (88% of all of the company's water). Importantly, the WRMP provides a forecast of the supply-demand balance over the plan period. This balances the Deployable Output (i.e. the water available for use) from a 1 in 200-year severe drought against an unconstrained demand year. In other words, this balance is precautionary as it models a scenario in which groundwater levels or river flows are much lower than normal, restricting the amount of available for abstraction. Supply-demand balances also account for other factors, including:
- Impacts of climate change;
 - Process losses;
 - Outages; and
 - Bulk supplies.
- 6.107 The WRMP shows that the WRMP is in a supply-demand deficit throughout the entire planning period from 2019/20 (-27.9 MI/d) to the largest deficit in 2044/45 (-80 MI/d). This is despite non-household consumption and leakage losses decreasing over time. The WRMP concluded that other options would be required to address this imbalance and ensure the water supply throughout the planning period. Options to reduce the supply-demand deficit were then considered, including proposals to increase licensed abstraction volumes. However, most options for increasing abstraction licenses (in particular from surface waterbodies) were screened out on environmental grounds. Options relating to desalination were also screened out, because these were conflicting with options included in Southern Water's WRMP.
- 6.108 Several schemes to maximise Deployable Output (DO) were taken forward to the list of feasible alternatives, including four groundwater resources (Sources O, J, H and C). The statutory HRA and SEA review process did not identify any concerns regarding the increased DO obtained from the groundwater resources. One of the main reasons for this is that none of the resource options require increases in licensed abstraction quantities. Instead, they focus on maximising the DO through technology improvements at the boreholes, such as the installation of new water filtration techniques. All four options maximising groundwater sources have been included in the company's preferred plan going forward. AECOM has requested access to Portsmouth Water's WRMP HRA, which will be considered in the HRA for the Reg.19 stage of the PLP.
- 6.109 The WRMP seeks to supply all projected growth in the region including growth in Portsmouth City and is based on robust population projections including climate change which go well beyond the PLP period. It has been adopted on the basis that no adverse effect on the integrity of Habitats sites will arise and does not involve any increases to licensed groundwater abstractions or the exploration of new water resources. Therefore, it is concluded that the emerging PLP will not result in adverse effects on Solent's Habitats sites

regarding water quantity, level and flow, in-combination with other plans and projects. As such, no additional policy wording is recommended for insertion in the PLP.

Atmospheric Pollution

- 6.110 The Solent's Habitats sites are all sensitive to atmospheric pollution to varying degrees. Changes to SAC habitats or effects on SPA / Ramsar bird species are primarily the result of atmospheric nitrogen deposition resulting from increases in commuter traffic. The emerging PLP allocates 13,603 net new dwellings and a minimum of 138,429m² of employment land. New Portsmouth City residents commuting within or out of the authority, as well as residents from adjoining authorities working in new employment opportunities within the city, are likely to increase the local commuter traffic considerably.
- 6.111 Potential effects are only considered relevant where a major road (i.e. an A road) runs in a reasonable commuter corridor connecting a plan area with potential employment destinations and where said road lies within 200m of a Habitats site sensitive to atmospheric pollution. Detailed mapping of sensitive habitats within a site also needs to be consulted, because such habitats often only occupy smaller sections of designated sites. In contrast to the previous sections in this AA, all sites are discussed separately in the following. This is due to the unique road infrastructure surrounding each of the sites, with likely impacts on their suitability as commuter corridors. As identified earlier in this HRA the main potential for adverse effects for Portsmouth arises in the relatively few areas where key commuting routes lie within 200m of areas of saltmarsh.

Portsmouth Harbour SPA / Ramsar

- 6.112 The Portsmouth Harbour SPA / Ramsar is designated for species that are potentially sensitive to atmospheric nitrogen deposition. APIS identifies that the littoral habitats these species rely on (i.e. the intertidal zone) has a critical nitrogen load of 20-30 kg N/ha/yr. While red-breasted mergansers are not sensitive to atmospheric pollution, both black-tailed godwits and dark-bellied Brent geese are potentially sensitive. Black-tailed godwits mainly eat invertebrates, such as molluscs and crustaceans inhabiting the intertidal zone. However, the effect of nitrogen deposition and an increase in plant growth on this species is uncertain, potentially being a positive one due to an increase in the abundance of invertebrate prey. The main potential threat of nitrogen deposition is therefore to dark-bellied Brent geese, because an increase in graminoids could lead to the disappearance of preferential foodplants in saltmarsh.
- 6.113 Policy PLP3 of the PLP allocates Tipner West & Horsea Island East, and this includes a proposal for a bridge between the Tipner peninsula and Horsea Island, running alongside the M275. This bridge will provide a faster route between Portsea Island and the mainland, enabling more convenient access to the Horsea Island Open Space. It is to be noted that there will be no through-traffic between Horsea Island and settlements to the north (e.g. Paulsgrove and Portchester) and the bridge will therefore be used by local bus services, pedestrians and cyclists only. Traffic and air quality modelling undertaken the Regulation 19 Local Plan modelled 5 transects into this SPA/Ramsar including E01 to E04 off the M275. The full data are reported in Appendix C of this HRA. However, in summary, no air quality effect on Habitats sites will arise because no air pollution sensitive habitats lie within 200m of any of the modelled links, including the proposed bridge (i.e. no vegetated habitats, just intertidal mudflats).
- 6.114 In addition to exhaust emissions, construction of the bridge and its piers may involve some dust generation. However, this cannot be assessed until a planning application is being prepared and there are effective standard dust control techniques available to minimise dust deposition.
- 6.115 Therefore, no adverse effect on the integrity of the Portsmouth Harbour SPA/Ramsar site from air quality impacts will arise.

Chichester and Langstone Harbours SPA / Ramsar

- 6.116 The Chichester and Langstone Harbours SPA / Ramsar is designated for a range of waterfowl and wader species, some of which are indirectly sensitive to the effects of atmospheric nitrogen deposition. It was established earlier in the HRA report that the only air quality sensitive habitat that may be affected by increased nitrogen deposition within this SPA/Ramsar site as a result of the PLP were localised areas of saltmarsh.

- 6.117 The dark-bellied brent geese may be impacted through increased nitrogen deposition due to their reliance on saltmarsh for feeding. There is saltmarsh within approx. 36m from the A27 / A3 interchange in the adjoining authority of Havant. This stretch of the A27 is extremely busy with a total AADT of 116,718 cars, 22,797 Light Goods Vehicles and 5,607 Heavy Goods Vehicles in 2019. The road link is likely to be a major journey-to-work route for Portsmouth City residents, particularly because Havant is the most important origin of and destination for commuters associated with the city. Overall, Havant accounts for 27.9% of daily trips into and 25.7% trips out from Portsmouth City. Given this evidence, traffic and air quality modelling has been undertaken for this stretch of the A27 to inform the HRA of the Reg.19 PLP.
- 6.118 Four transects, E06 to E09, were modelled into this SPA/Ramsar site for the Local Plan traffic and air quality modelling. Two of those transects (E07 and E09) have saltmarsh within 200m of the roadside, as discussed in the likely significant effects section. As also discussed in that section it is considered that the 20 kgN/ha/yr critical load is most appropriate for the SPA/Ramsar bird interest because these are more dependent on lower and pioneer saltmarsh than on drier and more densely vegetated upper saltmarsh, and because they are not susceptible to relatively subtle botanical changes in the marsh as opposed to major structural changes. The saltmarsh on transect E07 is 15m from the roadside at the closest. The saltmarsh on transect E09 is approximately 40m from the roadside at its closest. Each transect is discussed in turn below.

Transect E07 (A27)

NOx

- 6.119 Future NOx concentrations are not forecast to exceed the critical level of 30 $\mu\text{g}\text{m}^{-3}$. Therefore no negative effect through NOx in atmosphere is expected.

Ammonia

- 6.120 The upper critical level for ammonia of 3 $\mu\text{g}\text{m}^{-3}$ (applicable to saltmarsh which has no significant lichen or bryophyte interest) is exceeded up to 40m from the roadside, affecting c. 0.3ha of saltmarsh. According to the JNCC data 23% of the SAC consists of saltmarsh i.e. 2,585.92ha. Therefore, the in combination effect would apply over 0.01% of the saltmarsh in the SAC.
- 6.121 The 'in combination' effect from all traffic growth up to 2041 is forecast to be large, being 23% of the critical level. However, the contribution of the Portsmouth Local Plan is a maximum of 1% of the critical level. Therefore, the 'in combination' effect is associated with growth across southern England, given the regionally strategic nature of the A27 as one of the busiest trunk roads in the UK, rather than by local growth. On other projects Natural England have accepted that where the national strategic highway network managed by National Highways is involved, this is a regional/national issue rather than a Local Plan matter provided the Local Plan itself makes no material contribution to any 'in combination' effect.
- 6.122 The forecast 'in combination' effect averages at 0.03 micrograms of additional ammonia per annum, meaning the Portsmouth Local Plan is responsible for effectively 1 year of additional ammonia. Moreover, ammonia concentrations fluctuate greatly due to meteorological factors. Scrutiny of ammonia data from the UKEAP national ammonia monitoring network for a range of sites covering 2010-2019 shows that at urban sites like this one background ammonia concentrations generally fluctuate by as much as 3 $\mu\text{g}/\text{m}^3$ (100% of the critical level) throughout the year. Therefore, care should be taken not to read too much into very small (in absolute rather than percentage terms) forecast changes in average ammonia concentration. As such, even without the Portsmouth Local Plan, little difference would be seen in future ammonia emissions. No adverse effect on integrity is therefore expected due to the Portsmouth Local Plan alone or in combination with other plans or projects.

Nitrogen deposition

- 6.123 The 20 kgN/ha/yr critical load for nitrogen deposition is exceeded throughout the transect. The 'in combination' effect from all traffic growth up to 2041 is forecast to be large, being 18% of the critical load at its greatest. However, as with ammonia the contribution of the Portsmouth Local Plan is imperceptible being a maximum of 0.8% of the critical load (0.15 kgN/ha/yr). Therefore, as with ammonia the 'in combination' effect on the A27 is driven by traffic growth across southern England rather than local traffic growth. On other projects Natural England have accepted that where the national strategic highway network managed by National Highways is involved, this is a regional/national issue rather than a Local Plan matter provided the Local Plan itself makes no material contribution to any 'in combination' effect.

6.124 Moreover, there is still forecast to be a net reduction (improvement) in nitrogen deposition by 2041 even allowing for growth. In the absence of growth an improvement of 5.11 kgN/ha/yr is forecast to result, which is approximately 0.23 kgN/ha/yr on average. Portsmouth Local Plan will therefore retard this improvement by approximately 8 months, which is not significant. Therefore, no adverse effect on integrity would arise either alone or 'in combination' with other plans or projects.

This matches the conclusion that Havant Council have drawn based on their own traffic modelling and air quality modelling for this area which concluded that no 'in combination' adverse effect on saltmarsh habitat would arise.

6.125 Note that the model is likely to materially overestimate ammonia and nitrogen emissions because it takes no account of the expected significant electrification of the vehicle fleet from 2030, which will result in a considerable reduction in traffic-related NO_x and ammonia emissions.

Transect E09 (A2030 Eastern Road)

NO_x

6.126 At the closest area of saltmarsh, future NO_x concentrations are not forecast to exceed the critical level of 30 µg^m⁻³. Therefore no negative effect through NO_x in atmosphere is expected.

Ammonia

6.127 At the closest area of saltmarsh, future ammonia concentrations are not forecast to exceed the upper critical level of 3 µg^m⁻³ applicable to saltmarsh. Therefore no negative effect through ammonia in atmosphere is expected.

Nitrogen deposition

6.128 At the closest area of saltmarsh, nitrogen deposition rates are not forecast to exceed the 20 kgN/ha/yr critical load, being a maximum of 15.36 kgN/ha/yr. Therefore, no adverse effect on the saltmarsh habitat and thus on the SPA/Ramsar birds that use it is expected.

6.129 Moreover, it is important to note that the experimental studies which underlie conclusions regarding the sensitivity of saltmarsh have '... neither used very realistic N doses nor input methods i.e. they have relied on a single large application more representative of agricultural discharge'⁸⁹, which is far in excess of anything that would be deposited from atmosphere. Therefore, APIS indicates that determining which part of the critical load range to use for saltmarsh requires expert judgment.

6.130 Generally, nitrogen inputs from the air are not as important as nitrogen from other sources. Effects of nitrogen deposition from atmosphere are likely to be dominated by much greater impacts from marine or agricultural sources. This is reflected on APIS itself, which states regarding saltmarsh that 'Overall, N deposition [from atmosphere] is likely to be of low importance for these systems as the inputs are probably significantly below the large nutrient loadings from river and tidal inputs'⁹⁰. Another mitigating factor is that the nature of intertidal saltmarsh in the Solent estuaries means that there is daily flushing from tidal incursion. This is likely to further reduce the role of nitrogen from atmosphere in controlling botanical composition.

Solent Maritime SAC

6.131 The qualifying habitats of the Solent Maritime SAC have varying degrees of sensitivity to atmospheric nitrogen deposition. Review of information on APIS indicates that the habitats most sensitive to atmospheric pollution are the perennial vegetation of stony banks (critical nitrogen load of 8-15 kg/ha/yr) and shifting dunes along the shoreline with *Ammophila arenaria* (critical nitrogen load of 10-20 kg/ha/yr). Furthermore, there are several saltmarsh-related species that have nitrogen sensitivity, although see the previous section for comments on the general sensitivity of saltmarsh and the appropriateness of the upper critical load for these communities in the modelled locations. Large sections of the SAC overlap with the Chichester and Langstone Harbours SPA / Ramsar, and similar A roads are therefore likely to be relevant for an appraisal as potential commuter routes, including the A2030 and the A27.

6.132 An air quality Habitats Regulations Assessment was undertaken for the Havant Borough Local Plan (2016-2036) by Ricardo Energy & Environment. Importantly, the air quality modelling work covers the same period

⁸⁹ <http://www.apis.ac.uk/node/968>

⁹⁰ Ibid.

as that covered by the emerging PLP. While the assessment comprised some scenarios that are not relevant to the PLP (i.e. a Havant Borough Do Minimum scenario only including the growth in Havant District), a Partnership for Urban South Hampshire (PfSH) Do Minimum scenario including 100,000 additional dwellings was also modelled. This included the development allocated in the PLP and therefore provides an in-combination assessment of potential atmospheric pollution effects.

- 6.133 The air quality assessment initially confirmed that the PfSH Do Minimum scenario would contribute a maximum of 3.6 kg/N/ha/yr, representing 45% of the critical load. Ground-truthing surveys to look for the most air quality sensitive habitats (sand dunes and perennial vegetation of stony banks) showed that there were no sand dunes within the areas for which an exceedance of screening thresholds was predicted. However, two areas originally identified as comprising perennial vegetation of stony banks were identified within 200m from the A2030 along the eastern edge of Portsmouth City.
- 6.134 The section of the Havant HRA that dealt with air quality thus recommended that Havant Borough Council should develop a joint Nitrogen Action Plan (NAP) with Portsmouth City Council under the Duty to Co-Operate. However, that was based on the understanding that the affected area constituted 'perennial vegetation of stony banks' (relatively intolerant of atmospheric nitrogen deposition) whereas Coastal Partners have identified the area as saltmarsh, which is much more tolerant of atmospheric nitrogen deposition. This area of saltmarsh is to be directly affected by the NPI Phase 4 Coastal Defence Project and suitable compensatory provision of saltmarsh is to be agreed and delivered for that independent scheme. The requirement for a NAP will therefore be reinvestigated as part of further work being undertaken by Havant Council and Portsmouth Council for their respective HRAs. If the habitat in question is saltmarsh then the modelling for Havant Local Plan indicates that the critical load for saltmarsh will not be exceeded, meaning an adverse effect on integrity would not arise.
- 6.135 Review of the emerging PLP indicates that it contains broad protective policy wording designed to minimise nitrogen deposition in Habitats sites. Policy PSP1 specifies that '*For development adjacent to European-designated wildlife site, it should be demonstrated that proposals do not result in deposition and the level of pollutants do not have a significant effect on the integrity of the wildlife site*'. While this wording clearly protects Habitats sites from air quality-related adverse effects, current evidence indicates that this will not be the case (in the absence of mitigation).
- 6.136 Since there are no sand dunes or perennial vegetation of stony banks within 200m of the A27 or A2030, and the likely significant effects section has confirmed that the saltmarsh consists of communities of low atmospheric nitrogen sensitivity, the assessment reported for Chichester & Langstone Harbours SPA/Ramsar applies to the SAC as well and thus no adverse effect on integrity is expected alone or in combination with other plans or projects.

Impacts of Tall Buildings / Structures on Flight Lines and Sight Lines

- 6.137 Natural England's Supplementary Advice Note on Conservation Objectives highlights the importance of maintaining an adequate landscape for qualifying bird species, such as black-tailed godwits and especially the brent geese. The note specifies that an open and unobstructed terrain should be maintained within at least 0.5km of roosting or foraging areas. Qualifying birds require obstacle-free sightlines for the early detection of predators and the visual propagation of display behaviours. Furthermore, clear flight lines facilitate unobstructed bird movement between the SPA / Ramsar and functionally linked habitats.
- 6.138 The SWBGS carried out a detailed statistical assessment of site usage by waders and brent geese in relation to various topographical and proximity parameters. The data show that urbanisation of the surrounding area is a significant predictor of site suitability to SPA / Ramsar birds. Buildings within three distance ranges were considered, namely within a 50m zone, a 50-500m zone and a 500-2,500m zone. Generally, supporting habitats were statistically more suitable if there were no buildings within the three distance ranges (although for brent geese this was only the case for the 50-500m zone). These data appear to support that waterfowl and waders primarily utilise supporting habitats without adjacent housing, perhaps because birds can more easily navigate to habitats with unobstructed flightlines.
- 6.139 Both the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar support mobile species that frequently navigate between their designated site boundaries and off-site supporting habitats. The potential for any of the Strategic Allocations in the PLP to affect the flight or sight

lines will apply to birds from both SPAs / Ramsars. Therefore, the discussion on these sites is combined in the following paragraphs.

Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar

- 6.140 Review of the urbanisation pattern around Portsea Island indicates that the Strategic Allocations in the PLP are unlikely to affect the manner in which birds navigate between the two SPAs / Ramsars. This is because large parts of Portsea Island are already developed and present obstacles to flight lines. Equally, in most instances, new buildings are unlikely to be a problem, because they would be erected against the backdrop of an existing urban frontage with potentially large buildings. New development proposals are likely to have the biggest impact on flight lines and sight lines where they lie on undeveloped land and in between potential flight corridors between the SPAs / Ramsars and supporting habitats.
- 6.141 However, development in these allocations could affect how birds navigate between supporting habitats. Furthermore, unusually tall buildings or new continuous urban frontages could render existing supporting habitats unsuitable by restricting the sight lines of birds currently using these habitats. The following paragraphs will assess the potential impacts of the Strategic Allocations on sight lines and flight lines of SPA / Ramsar birds.
- 6.142 Development in Tipner West & Horsea Island East (PLP3) has the highest potential for negatively impacting the flight lines of geese or waders utilising Primary Support Areas (P40, P40A, P43 and P60) and Areas of Low Use (P38, P39 and P136) further landward to the east of the allocation. The obstruction of flight lines may render it more difficult for birds from the core of the SPA / Ramsar to reach these supporting habitats. Furthermore, the Tipner East site (PLP4) lies within 500m of these functionally linked habitats (it will also result in the loss of one area of functionally-linked land, low use area P136, which is discussed separately under functionally-linked land). The construction of tall buildings here, could lead to the loss of adequate sight lines required by brent geese, and their subsequent avoidance of these land parcels.
- 6.143 The construction of tall buildings and / or a continuous urban frontage in the easternmost part of the St. James' and Langstone Campus could reduce the utilisation of a Secondary Support Area (P25) and a Core Area (P23B) by SPA / Ramsar birds. Overall, the likelihood and magnitude of potential adverse effects will inevitably be subject to the detail of development proposals ultimately brought forward.

Bridge Proposal between Tipner and Horsea Island

- 6.144 Depending on its height, a future bridge between the Tipner Peninsula and Horsea Island for buses, pedestrians and cycles has the potential to impact on how SPA / Ramsar waterfowl use the flight corridor between Tipner Lake and Portsbridge Creek. Furthermore, birds use visual cues for navigation and additional obstacles have the potential to result in changes to their flight routes, with potential negative impacts on bird energy budgets. The site promoter commissioned a study of waterfowl flight routes in this part of the SPA / Ramsar to inform whether a low or high bridge will be taken forward.
- 6.145 Wintering bird surveys were undertaken for the project between November 2019 and March 2020 and November 2021 and March 2022. These covered the area surrounding Tipner West were undertaken by WSP to establish the importance of this part of the Portsmouth Harbour SPA / Ramsar to qualifying birds. A focussed survey of the area within 250m of the M275 Bridge was also undertaken in both years to establish existing flight paths of birds and inform the bridge proposal. The 2019-20 vantage point survey on the bridge recorded the passing of 23 species of water bird, both below and above the M275. Larger birds and waders (e.g. brent goose and curlew) appear to cross above the bridge, whereas smaller waders (e.g. redshank *Tringa totanus*) preferentially cross below it. During the 2021-22 surveys the passage of 24 species of water bird was recorded below or above the M275. These included those which preferentially fly above the bridge (geese and larger waders such as curlew) and species which were almost always recorded crossing below the bridge only (small waders such as common sandpiper *Actitis hypoleucos*). Despite the high baseline noise level, no disturbance events from traffic on the motorway bridge were recorded, suggesting that SPA / Ramsar species in the survey area are habituated to traffic noise. The lack of disturbance events recorded by boats indicates habituation of wintering birds to boat traffic across the Survey Area. These data will help determine some of the specifications of the Tipner-Horsea bridge, ensuring there will be minimal impact on the flight behaviour of SPA / Ramsar birds.

- 6.146 Any impact assessment of flight routes will have to be submitted at the planning application stage and will be considered as part of a project-specific Habitats Regulations Assessment to ensure there are no adverse effects on the integrity of Solent's Habitats sites.

Conclusions and Recommendations

- 6.147 Overall, AECOM considers that there is a risk of new urban development allocated in the PLP to affect the sight- and flight lines of SPA / Ramsar birds. This particularly applies to the Tipner West & Horsea Island East development, covered by policy PLP3, which comprises largely undeveloped land between the SPA / Ramsar and functionally linked supporting habitats and involves the construction of a bridge. The different options currently proposed for the development of Tipner, are likely to have direct relevance for the behaviour and movement of SPA / Ramsar birds, depending on the density and design features of new buildings.
- 6.148 This impact pathway will be assessed further at the planning application stage, when specific design criteria (e.g. building dimensions, fabric and lighting schemes) are available and a further project-level HRA will be undertaken.
- 6.149 Policy PLP39: Biodiversity includes the following text "The design of buildings including its height and lighting schemes should be such that there are no adverse effects on sight lines and flight lines of birds in Habitats sites or functionally linked habitats. Buildings should also be designed such that the risk of bird collisions is minimised". PLP1 states that 'Where proposals for a tall building(s) fall within 500 metres of an SPA, SSSI, SAC and/or Ramsar sites, and supporting functionally linked habitats appropriate mitigation measures shall be secured, in consultation with Natural England, to ensure there is no adverse effect on ecological integrity'. Taken in combination with the requirement for a project-level HRA at the planning application stage it is considered the plan presents a sufficient policy framework to ensure no adverse effects on integrity arise.
- 6.150 Being a strategic development plan, it is concluded that the emerging PLP will not result in adverse effects on the Portsmouth Harbour SPA / Ramsar and the Chichester and Langstone Harbours SPA / Ramsar regarding impacts on flight lines and sight lines. This is because the plan does not contain sufficient detail relating to individual development proposals. However, this HRA has flagged the Strategic Allocations for which this impact pathway is most likely to be an issue.

Coastal Squeeze

Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC

- 6.151 Policy PLP31 (Flooding) identifies that new or replacement coastal defence schemes will be delivered in Portsmouth City, provided that they are consistent with the management approaches identified in the North Solent Shoreline Management Plan (SMP).
- 6.152 Portsmouth City and the wider Solent coastline encompass highly populated areas, with people living in close proximity to the sea. Urban development is typically protected from flooding by coastal defence schemes including hard structures as well as beach management. At the same time, many of the habitats supporting SPA / Ramsar bird species (e.g. mudflats and saltmarsh) or SAC habitats themselves are vulnerable to a process known as coastal squeeze. As highlighted in the section on impact pathways, this involves the loss of habitats under climate change pressures (including sea level rise), which are prevented from 'migrating' landwards by coastal defence structures.
- 6.153 In the Solent, these defences are specified in the North Solent SMP, a document that is subject to consultation with statutory bodies (including Natural England) and HRA. SMPs provide large-scale assessments of processes such as coastal flooding and erosion, and advice to operating authorities on the management of their coastal defences. SMPs are also to comply with international and national nature conservation legislation, including the protection of Habitats sites.
- 6.154 The section of the coastline relevant to Portsmouth City is addressed in the Policy Units 5API01 and 5API02 of the SMP. More important for the supporting habitats in the Chichester and Langstone Harbours SPA / Ramsar is Policy 5API01, which includes the frontage shared between Portsmouth City and Langstone

Harbour. The final policy option for this shoreline is 'Hold the Line', which is to maintain, sustain and improve the current sea defences in order to protect the residential, employment and transport infrastructure of the Portsmouth City conurbation. The policy acknowledges that holding the defence line will inevitably contribute towards the loss of intertidal SPA, Ramsar and SAC habitats. The policy acknowledges that 'these losses will need to be mitigated within the same designated area or compensated for elsewhere and delivered through the Regional Habitat Creation Programme'.

- 6.155 The SMP was also subject to HRA, which concluded that the plan would result in adverse effects on the site integrity of the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC. It was determined that the SMP would lead to the combined loss of 826ha of mudflat and saltmarsh habitats in these three Habitats sites over the coming 100 years. Furthermore, 10 foraging / high-tide roost sites for SPA / Ramsar waterfowl and waders would be lost. The HRA also confirmed that it would not be possible to mitigate this habitat loss. However, it was considered that there were Imperative Reasons of Overriding Public Importance (IROPI) despite the plan's adverse effects on Habitats sites. The HRA also identified that compensation opportunities at three sites existed with the potential to deliver 263ha of saltmarsh and mudflat habitat.
- 6.156 Policy PLP36 (Coastal Zone) of the emerging PLP stipulates that 'Development proposals in the Coastal Zone... will be permitted where they:... e) Are consistent with the Shoreline Management Plan and South Inshore and South Offshore Marine Plans.' By referring to the SMP, which has undergone HRA and was adopted on the 15th December 2010, and the Flood and Coastal Erosion Risk Management Strategy (FCERM) which was also subject to HRA, the PLP ensures that the approach to the management of coastal defences is compliant with the Habitats and Species Regulations 2017 (as amended).
- 6.157 Coastal squeeze will arise from implementing SMP policy, and the Tipner West & Horsea Island East development (Policy PLP3) has therefore allowed for compensation for approximately 1ha of coastal squeeze in its compensation proposals for direct habitat loss at Portsmouth Harbour SPA/Ramsar. However, this stems from the SMP and Coastal Strategy process, rather than from the Local Plan process. With regard to proposals for Tipner West and Horsea Island East, it is noted that options that allow for potential new habitat creation (e.g. saltmarsh habitat through a strategy of No Active Intervention) could reduce coastal squeeze pressures. As such habitat creation opportunities for Horsea Island East and for the terrestrial SPA at Tipner West could have positive effects in this regard.
- 6.158 The Solent has recently undergone a review (the 'SMP-Refresh' project) and no changes are proposed to the policies and management approaches set out in the 2010 version. There are no current plans to formally re-write the SMP. As coastal defences are designed in detail (including taking account of any need to meet a higher standard of protection) those designs may result in a defence footprint change which exceeds that taken into consideration in the Coastal Strategy HRA. However, that depends entirely on the nature of the design (sheet piling for example would provide a higher standard of protection but not involve an increase in defence footprint) and is therefore a matter for planning applications.

Direct Habitat Loss from Solent & Dorset Coast SPA and Portsmouth Harbour SPA / Ramsar

- 6.159 During bird surveys for Tipner West and Horsea Island (PLP3) in 2021-22, four species for which Portsmouth Harbour SPA/Ramsar is designated were recorded. Grey plover, an SSSI designation species, were not recorded. In addition, a further 15 waders, 15 waterfowl and 22 other water bird species were recorded. Of these species brent goose, curlew *Numenius arquata*, oystercatcher *Haematopus ostragalus*, little egret *Egretta garzetta* and mallard *Anas platyrhynchos* were recorded using terrestrial habitats as well as those within the harbour. All other water birds were recorded in marine areas only. Brent geese overfly terrestrial areas but waders typically move around the Portsmouth Harbour SPA/Ramsar site following the coast or deep water channels, with the exception of those flying inland to forage on terrestrial areas.
- 6.160 Wader roost locations were identified within the Main Site Survey Area as follows:
- World War II slipways to the south of Horsea Island East;
 - dilapidated concrete jetty in Tipner Lake;
 - exposed shingle on the southern side of Tipner Firing Range;

- the M275 revetment in Tipner Lake;
 - seawall to the west of Port Solent;
 - Pewit Island within the Central Harbour Survey Area;
 - Jetties within the western section of the Central Harbour Survey Area;
 - Paulsgrove Lake;
 - Tipner Lake east of M275; and
 - Alexandria Park Playing Fields.
- 6.161 Comparison of the percentage of peak mean recorded in 2019/20 and 2021/22 showed an increase in the percentage of peak mean of black-tailed godwit and dunlin recorded within the Main Site Survey Area in 2021/22. For brent goose and red breasted merganser however, there was a decrease in percentage of peak mean with fewer birds recorded. The percentage of peak mean decreased for all species within the Central Harbour Survey Area in 2021/2022, with a notable decrease of 533% for black-tailed godwit and 163% for dunlin. Grey plovers were not recorded within the Main Site Survey Area or Central Harbour Survey Area in 2021/22 but 73% of the percentage mean was recorded within the Central Harbour Survey Area in 2019/20. Most of the aquatic/intertidal parts of Portsmouth Harbour SPA/Ramsar also overlap with the Solent & Dorset Coast SPA. The terrestrial areas of Portsmouth Harbour SPA/Ramsar do not overlap with Solent & Dorset Coast SPA.
- 6.162 Other than new flood defences (discussed above), Policy PLP3: Tipner West & Horsea Island East allocates the delivery of 58,000m² marine employment floor space, 814 to 1,250 residential dwellings and a bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only. In association with marine employment, the policy states that 'the deep water access to Tipner Point and the new marine hub quaysides will be maintained'. To ensure deep water access to the new marine hub quaysides, dredging of approximately 2.1ha of intertidal habitat within Portsmouth Harbour SPA/Ramsar site will be required, converting it to subtidal habitat. This will reduce the overall net extent of intertidal habitat available for bird roosting and foraging within the SPAs/Ramsar.
- 6.163 Other aspects of development delivery are likely, though not certain, to involve land-take from the SPAs/Ramsar site depending on how the development is designed for the planning application. These elements are the creation of the marine hub itself and the construction of the bridge. This is reflected in Figure 4.2 of the Local Plan which shows the allocation boundary for PLP3 and includes two areas of possible reclamation for employment use. Up to 0.5ha of subtidal habitat could potentially be lost if these possible areas of reclamation were realised. While the construction design for the bridge will not be determined until the planning application stage, one of the most common methods of bridge installation is to place piers in the subtidal and intertidal zone, on which the bridge deck is then situated. This would involve the loss of up to 0.3ha of intertidal habitat within the SPA/Ramsar.
- 6.164 In addition, delivery of the higher housing number could potentially involve loss of terrestrial habitat within the SPA/Ramsar boundary. This depends on the number of dwellings to be delivered, the detailed masterplan for the planning application and evidence of viability and feasibility. As a worst-case this could involve up to 3.6ha of terrestrial habitat south of the firing range that lies within the SPAs boundary and supports SPA birds particularly during high tide. This would only arise under one of the development options currently being considered by the project promoter (known as Option B) and is not an explicit requirement or inevitable outcome of Policy PLP3. The potential habitat loss identified is, however, substantially less than that identified in relation to the Reg 18 Local Plan, where as much as 28ha of land reclamation was proposed with the creation of a 'super peninsula'. The two options currently under consideration by the project promoter are shown here for illustrative purposes, but it is emphasised that this HRA assesses the likely significant effects of Policy PLP3 rather than any particular option for development.



Figure 5: Option A, formerly Option 14v2



Figure 6: Option B, formerly Option 9

6.165 Policy PLP3 clearly acknowledges the inevitable loss of intertidal habitat due to dredging for the deep water marine hub and sets out a requirement to avoid other SPA/Ramsar habitat loss or minimise the loss to that necessary to deliver a viable scheme: 'Except for the minimum dredging necessary to establish and maintain deep water access to the marine hub, avoid the loss of, or damage to, SPA/Ramsar habitats. If that is not viable or feasible, minimise such loss, or damage, to that required to enable the viable and feasible development of the site in line with the development quantum set out in this policy while protecting the integrity of international, national and local nature designations.' The allocation boundary in Figure 4.2 of the Local Plan explicitly limits the extent of policy-compliant habitat loss from the SPAs/Ramsar site in the event that any such loss (beyond that for the deep water channel) is necessary to deliver a viable and feasible development.

6.166 Clearly, the most important consequence of the Tipner Strategic Allocation would be habitat loss from the Portsmouth Harbour SPA / Ramsar and Solent & Dorset Coast SPA, resulting in the long-term loss of roosting and foraging habitat for black-tailed godwits, brent geese, dunlins and red-breasted mergansers and some loss of foraging habitat for terns. Development on the Tipner peninsula would also result in the loss of two Primary Support Areas namely the Tipner Range (P60) and the much smaller land parcel P76, which are functionally linked to SPAs / Ramsars in the Solent (see functionally linked habitat section earlier

in the report). However, the loss of functionally linked habitat is not uncommon in the UK (or the Solent) and is offset by improving the functional value of other land parcels in suitable locations (see 6.2.7 to 6.2.10 of this report), without triggering the derogation tests that apply to land within SPA boundaries.

6.167 Clearly direct loss of functionally relevant habitat within an SPA/Ramsar would constitute an adverse effect on the integrity of that site. Adverse effects on site integrity cannot be avoided or mitigated where there will be permanent loss of parts of a designated site that contribute to the achievement of its conservation objectives. In such cases, development proposals need to pass statutory derogation tests. These tests are discussed in Chapter 8 of this report.

6.168 It is therefore concluded that an adverse effect on the integrity of Portsmouth Harbour SPA/Ramsar site and Solent & Dorset Coast SPA will arise, but only due to habitat loss within the SPAs / Ramsar site. This cannot be avoided or mitigated without significantly altering or removing Policy PLP3: Tipner West & Horsea Island East from the PLP due to the inevitable need for 2.1ha of intertidal habitat loss from dredging for the marine hub, the likely need for 0.3ha of intertidal habitat loss for the bridge piers, and the possibility of up to 0.5ha of subtidal habitat loss for reclamation for marine employment and up to 3.6ha of terrestrial habitat in the southern part of Tipner West.

6.169 In addition to habitat loss, the process of land reclamation, which may arise to deliver the marine employment hub, has a wide range of other potential impact pathways on Habitats sites⁹¹, including:

- Modification of the physical environment and hydrodynamics of the surrounding harbour and estuarine environment
- Changes to fine sediment deposition and resulting reduction in mudflats;
- Habitat alterations due to changes in sediment structure, resulting in changes to ecological community complexity and biodiversity;
- Burial and smothering of benthic communities due to sediment disposal;
- Increased turbidity as a result of sediment suspension (may affect functioning of photosynthetic organisms and / or visual predators);
- Potential increases in suspended particulate matter, resulting in the regression of sea grass beds; and
- Impacts on macrozoobenthos (defined as invertebrates over 1mm living on or in sediment) up to 2km from the reclamation site.

6.170 These other impacts identified in paragraph 6.169 above cannot be examined in detail at the Local Plan level because they require the details of engineering designs and construction methods. However, when a planning application is being prepared coastal process modelling will need to be completed to inform where such impacts may arise and whether they are likely to be significant. Any resulting effects will need to be mitigated, or as a last resort, compensated as part of finalisation of the Habitats site compensation strategy. It is not intended that the project will include sediment disposal within the harbour Habitats sites, except where specifically required for reclamation. Locations of sea grass beds, and marine habitat biotopes, have been mapped and macrozoobenthos surveys completed. It is not considered likely that these locations will be adversely affected by the project; however, coastal processes modelling will be completed to inform where such impacts may arise and whether they are likely to be significant.

6.171 A project-level HRA will be carried out for Tipner West and Horsea Island East at the planning application stage, to ensure that these impact pathways would not result in adverse effects on site integrity and that, where such a conclusion cannot be reached, the statutory derogations tests are met.

⁹¹ Environmental impacts of land reclamation are summarised in a 2008 OSPAR report. OSPAR Commission. (2008). Assessment of the environmental impact of land reclamation. 37pp. Available at: [https://www.ospar.org/documents?v=7123#:~:text=Land%20reclamation%20can%20have%20adverse%20effects%20on%20the%20marine%20environment.&text=Some%20impacts%20of%20land%20reclamation,\(OSPAR%202008%2F2009a\)](https://www.ospar.org/documents?v=7123#:~:text=Land%20reclamation%20can%20have%20adverse%20effects%20on%20the%20marine%20environment.&text=Some%20impacts%20of%20land%20reclamation,(OSPAR%202008%2F2009a)) [Accessed on the 03/11/2020]

7. Conclusions of the Appropriate Assessment & Recommendations

Introduction

7.1 This HRA assessed the potential implications of the emerging PLP on Habitats sites within 10km from the Portsmouth City boundary. Several sites directly abut the City, including the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar, the Solent Maritime SAC and the Solent and Dorset Coast SPA. Sites located further away were also assessed, including the Solent and Southampton Water SPA / Ramsar, and the Solent and Isle of Wight Lagoons SAC. The background sections on the Habitats sites and impact pathways identified that the following issues required assessment:

- Recreational pressure (in Habitats sites and functionally linked habitat);
- Loss of functionally linked habitat;
- Water quality;
- Water quantity, level and flow;
- Visual and noise disturbance from construction
- Atmospheric pollution; and
- Coastal squeeze.

7.2 Furthermore, the PLP is proposing a development on Tipner West & Horsea Island East linked by a bridge. These proposals are associated with further impact pathways, namely:

- Direct habitat loss from the Portsmouth Harbour SPA / Ramsar and Solent & Dorset Coast SPA
- Impacts of Tall Buildings / Structures on Flight Lines and Sight Lines

7.3 This section summarises the main conclusions and recommendations for policy amendments and further work to be undertaken with regard to these impact pathways. It is to be noted that adverse effects on site integrity cannot be excluded for some of these pathways, either because the Reg 19 PLP does not provide sufficient detail or because further work to inform a definitive assessment is being undertaken.

Recreational Pressure

7.4 The LSEs section and the Appropriate Assessment identified that the Portsmouth Harbour SPA / Ramsar, the Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC would be subject to increased recreational pressure due to the allocation of 13,603 net new dwellings. However, it was determined that the existing Bird Aware Solent Recreation Mitigation Strategy (SRMS), which details a suite of mitigation measures to avoid adverse effects of recreation, is an adequate mechanism to protect Habitats sites in the Solent, although specifically for Tipner West & Horsea Island East (PLP3) and Fraser Range (PLP13) bespoke mitigation solutions were identified to be required alongside the delivery of Horsea Island Open Space. The SRMS has been devised to buffer the Solent region from recreational impacts of future housing growth. Furthermore, the emerging PLP makes adequate formal reference to this mitigation strategy in Policy PLP39: Biodiversity. Subject to meeting the requirements of the SRMS, it is concluded that the PLP will not result in adverse effects on the integrity of Solent's Habitats sites regarding recreational pressure. No further policy / supporting text is recommended for inclusion in the Local Plan.

7.5 Regarding the issue of recreational pressure in functionally linked habitats, a conclusion of 'no adverse effect' on site integrity was also reached. Firstly, some of the supporting habitats are unlikely to be desirable destinations for recreation. Secondly, the existing high levels of recreational usage of many functionally linked habitats (e.g. Southsea Common) do not appear to affect their ability to support SPA / Ramsar bird species.

Loss of Functionally Linked Habitat

- 7.6 Given its highly urbanised nature, greenfield sites in the Portsmouth City area are scarce. AECOM recommends that allocations should avoid the loss of SPA / Ramsar bird supporting habitats where possible, as suitable replacement habitat is not an inexhaustible resource. Given this, development proposals within the allocation boundaries should be directed away from any sites identified by the SWBGS.
- 7.7 The HRA notes that explicit wording has been added to the policy text for the following Strategic and Allocated Sites:
- Tipner and Horsea Island East (Policy PLP3)
 - Tipner East (Policy PLP4)
 - Lakeside North Harbour (PLP5)
 - St. James' and Langstone Campus (PLP8)
 - Horsea Island Open Space (PLP9)
 - Fraser Range (PLP 13)
- 7.8 It is concluded that the Plan would have no adverse effects on the site integrity of SPAs / Ramsars in the Solent.

Disturbance from Construction

- 7.9 Portsmouth City directly abuts several Habitats sites designated for waterfowl that is sensitive to visual and auditory stimuli. Therefore, there is a high risk that construction works carried out within a precautionary 300m distance from the SPAs / Ramsars will result in disturbance to qualifying birds. To minimise the potential for adverse impacts, AECOM recommends a range of measures to be deployed to mitigate visual and noise disturbance effects.
- 7.10 The supporting text for Policy PLP39 (Biodiversity) includes the following measures:
- 7.11 It is generally advised that construction work within 100m of relevant SPAs / Ramsars or functionally linked habitats known to support SPA / Ramsar waterfowl and / or waders should avoid the period October to March (inclusive) entirely.
- 7.12 Where construction works will occur in a precautionary 300m buffer zone around the Habitats sites, an assessment of noise and visual disturbance potential should be undertaken for individual planning applications. Where works may be disturbing and cannot avoid the October to March period, adequate visual and noise screening equipment should be used to shield bird sightlines and buffer them against noise disturbance. Noise shielding should be such that noise levels at receptors are limited to 70 dB (or below); in other words, an 'acceptable' dose of noise is attained at the birds.
- 7.13 For any construction works carried out within the Portsmouth Harbour SPA / Ramsar such mitigation measures will be insufficient if the work is undertaken during the core winter/passage period. In such cases, the construction programme should be timed to avoid the October to March overwintering period of qualifying SPA / Ramsar birds. Avoiding this sensitive period will mean that any adverse visual and noise impacts on the Portsmouth Harbour SPA / Ramsar are prevented.
- 7.14 However, in the first instance, AECOM recommends that development within the allocations is spatially distributed such that any potential visual and noise disturbance is minimised. For example, the St, James and Langstone Campus allocation is relatively large. Focussing much of the (re)development in the western part of the allocation, would minimise disturbance impacts on the supporting habitats P25, P23A and P23B. However, space constraints mean that such an approach clearly is not possible for other Strategic Allocations (e.g. Tipner).

Water Quality

- 7.15 The water quality is a significant issue in all of the Solent's marine Habitats sites, as demonstrated by Natural England's emerging guidance on achieving nutrient neutrality. The Appropriate Assessment determine that the Havant and Portsmouth WwTW discharges into the Chichester Harbour SSSI, part of the overarching Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC. Portsmouth Harbour SPA/Ramsar site and Solent & Dorset Coast SPA were also considered vulnerable. Therefore, the emerging PLP was determined to result in likely impacts on the estuarine and marine water quality, without mitigation.
- 7.16 A review of the PLP shows that it already refers to water quality in the Solent and the concept of nutrient neutrality in Policy PLP44 (Nutrient Neutrality in International Nature Designations). It states that "*Development proposals... will be permitted where they demonstrate through a nutrient budget that they secure Nutrient Neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits or a mixture of these*". This policy text aligns the plan document with NE's requirement and places the onus on site promoters to ensure that there will be no net nutrient input to the Solent from future development.
- 7.17 Overall these sources of supply are providing credits equivalent to a total of 6,654.73KgTN/yr. When applied to the 20 year plan period to 2040 this gives the equivalent of 10.87 years' worth of nutrient credits available. The City Council may look to explore further sources of credit to improve its supply position. Therefore the City Council expects to have nutrient credits that go well beyond the end of the first five years of the Local Plan period when the Local Plan must be reviewed. Moreover, it is noted that the UK Government is planning to introduce proposals which would limit the need for nutrient neutrality to be delivered at the planning application level, with strategic solutions independent of the planning process taking their place.
- 7.18 Since the PLP is supported by calculations that demonstrate the nutrient surplus and mitigation requirement, and sets out the intended mitigation solution for at least the first 5 year plan period (since Local Plans must in any event be reviewed every 5 years), adverse effects of the plan on the integrity of the Portsmouth Harbour SPA / Ramsar, Chichester and Langstone Harbours SPA / Ramsar and the Solent Maritime SAC regarding water quality can be excluded, in-combination with other plans and projects.

Water quantity, level and flow

- 7.19 The emerging PLP will result in an increased demand for potable water in Portsmouth City, which will be delivered by Portsmouth Water, the company responsible for the public water supply in the wider Portsmouth area. However, an appraisal of Portsmouth Water's WRMP highlights that the supply of development in the region (including growth in Portsmouth City) does not involve any increases to licensed groundwater abstractions or the exploration of new water resources. Therefore, in line with the WRMP HRA, it is concluded that the emerging PLP will not result in adverse effects on Solent's Habitats sites regarding water quantity, level and flow, in-combination with other plans and projects. As such, no additional policy wording is recommended for insertion in the PLP.

Atmospheric Pollution

- 7.20 The Appropriate Assessment of atmospheric pollution highlighted that areas of saltmarsh are the only habitat that could be subjected to increased nitrogen deposition as a result of two-way commuter traffic associated with the PLP. Areas of saltmarsh within the following Habitats sites lie within 200m of likely commuter routes for Portsmouth City residents:
- Approx. 164m from the A32 in the Portsmouth Harbour SPA / Ramsar
 - Approx. 36m from the A27 / A3 interchange in the Chichester and Langstone Harbours SPA / Ramsar
 - Adjacent to the A2030 in the eastern part of Portsmouth City in the Solent Maritime SAC (note that this habitat was initially identified as 'perennial vegetation of stony banks' but later confirmed to comprise a saltmarsh community)
- 7.21 Given the proximity of sensitive habitats to the identified roads, further traffic modelling and, if required, air quality modelling was recommended by AECOM to Portsmouth City Council. This work has been

commissioned and is currently being undertaken. The findings of the traffic modelling exercise and any requirement for further air quality modelling, will be set out in the public consultation version of the PLP.

Coastal Squeeze

- 7.22 Any potential of the PLP to exacerbate coastal squeeze was also assessed. The maintenance and replacement of coastal defences along the Portsmouth City coastline is dictated by the North Solent Shoreline Management Plan (SMP). This identifies an approach of 'Hold the Line' for coastal defences relevant to Portsmouth, meaning that no changes to the existing structures are anticipated. Policy S10 (Coastal Zone) of the emerging PLP stipulates that '*new, or replacement coastal defence schemes should be consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan; and demonstrate that there will be no material adverse impact on the environment*'. By referring to the SMP, which itself has undergone HRA and was adopted in December 2010, the PLP ensures that there will be no adverse effects on the integrity of Habitats sites sensitive to coastal squeeze.

Impacts of Tall Buildings / Structures on Flight Lines and Sight Lines

- 7.23 AECOM considers that there is a risk of new urban development allocated in the PLP to affect the sight lines and flight lines of SPA / Ramsar birds navigating the wider Solent area.
- 7.24 This impact pathway will be assessed further at the stage of individual planning applications, when specific design criteria (e.g. building dimensions, fabric and lighting schemes) are available and a further project-level HRAs will be undertaken. Given that the PLP is a strategic planning document that provides insufficient detail to assess this impact pathway, it is concluded that the Plan will not result in adverse effects on the site integrity of Habitats sites designated for waterfowl and waders.
- 7.25 Policy PLP39 includes the following text "The design of buildings including its height and lighting schemes should be such that there are no adverse effects on sight lines and flight lines of birds in Habitats sites or functionally linked habitats. Buildings should also be designed such that the risk of bird collisions is minimised". Taken in combination with the requirement for a project-level HRA at the planning application stage it is considered the plan presents a sufficient policy framework to ensure no adverse effects on integrity arise.

Direct Habitat Loss from Solent & Dorset Coast SPA and Portsmouth Harbour SPA / Ramsar

- 7.26 An adverse effect on the integrity of Portsmouth Harbour SPA/Ramsar site will arise due to the inevitable need for 2.1ha of intertidal habitat loss from dredging for delivery of the marine hub, the likely need for 0.3ha of intertidal habitat loss for the bridge piers, and the possibility of 0.5ha of subtidal habitat loss for reclamation for the marine hub and up to 3.6ha of terrestrial habitat loss from land to the south of the firing range.

Conclusion of Appropriate Assessment

- 7.27 With the amendments recommended above and now included in the Local Plan, it has been possible to conclude that no elements of Portsmouth Local Plan will have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects, except for the redevelopment of Tipner peninsula as set out in Policy PLP3: Tipner West & Horsea Island East. With this policy remaining in the Local Plan it is therefore necessary for the derogation tests referenced in Chapter 2 to be explored.

8. Derogations

Introduction

- 8.1 Section 7 contains the appropriate assessment and identifies that Policy PLP3: Tipner West & Horsea Island East will have an adverse effect on the integrity of Portsmouth Harbour SPA/Ramsar site through permanent habitat loss. This section of the report therefore assesses Policy PLP3 against the necessary derogations to consider whether the Local Plan can be adopted with Policy PLP3 as written.
- 8.2 The Test of Likely Significant Effects and Appropriate Assessment are fundamentally ecological technical assessments and have therefore been undertaken by AECOM's technical specialists. The statutory derogations tests are somewhat different. AECOM's technical specialists are well placed to assess the suitability of compensatory habitats and have done so in the analysis at section 8.4 below. However, the existence or absence of alternative solutions and IROPI are matters which require a mix of planning judgement and ecological expertise. Consequently, for Sections 8.2 and 8.3 of this report AECOM has worked closely with Portsmouth City Council town planners notably Mr Nick Lloyd-Davies, BA(Hons) DipTP MRTPI, New Neighbourhoods Team Leader.
- 8.3 The overarching objective of the policy for the purposes of HRA consists of the project objective, the vision and policy PLP3 itself. Policy PLP3 is presented in full in Appendix B. The vision given in the Local Plan is: *'In 2040, Tipner West & Horsea Island East will form a new gateway to the City along with Tipner East and will be home to a new healthy and happy community. There will be a thriving new marine business hub that provides both jobs and opportunities for lifelong learning. People will live in good quality homes that are carbon neutral and will enjoy the new open space on Horsea Island. They will make fewer journeys by car and instead will make use of new and improved public transport connections and infrastructure, including a bridge to the mainland. New climate change resilient sea defences will defend the community alongside the existing residents of north Portsea Island. Historic land contamination will have been prevented from leaching into the Harbour. The Harbour's nationally and internationally designated saltmarsh and mudflat supporting populations of Brent Geese and wading birds will be cherished and protected, whilst the site's naval heritage will be positively enhanced in the public interest. The whole Tipner peninsula will be home to a community where residents, workers and visitors co-exist in harmony with nature.'*
- 8.4 The project objective as cited in the Local Plan is *'To create a marine employment hub in the Solent region with access to deep water, and of sufficient scale to enhance and expand the marine business cluster, along with critical infrastructure, and sufficient housing to help enable delivery of the development as well as support the growth in the marine workforce'*.

Alternative Solutions

- 8.5 Consideration of alternative solutions is required at both the strategic planning and project level. At the project level, the consideration of alternative solutions will necessarily have to explore in more detail the alternative approaches to development of the site, including site layout options, massing and quantum. Alternative solutions are discussed here at the strategic planning level and in relation to the following objectives of the proposed allocation:
- Sea Defences and Site Decontamination
 - Marine Employment Hub
 - Bridge
 - Enabling development in the form of Housing
- 8.6 This section does not consider alternative solutions to the provision of sea defences *per se* because, as discussed in section 6.9 of this report, habitat loss from coastal squeeze due to sea defences is a consequence of the North Solent Shoreline Management Plan (SMP)⁹² and associated coastal strategy⁹³, rather than the Local Plan and has been subject to its own separate derogations case (supported by the

⁹² [Shoreline Management Plan - Shoreline Management Plan \(northsolentsmp.co.uk\)](https://www.northsolentsmp.co.uk/)

⁹³ <https://environment.data.gov.uk/shoreline-planning/unit/SMP13/5API01>
<https://coastalpartners.org.uk/project/portsea-island-coastal-strategy>

- Secretary of State). However, the provision of sea defences and site decontamination are considered together below because the delivery of sea defences in line with the SMP is likely contingent on the delivery of Policy PLP3.
- 8.7 While alternative solutions are assessed individually for each of the objectives set out above, it is recognised that the allocation is a “package deal” which is very unlikely to be capable of delivery in a disaggregated manner. In particular, the financial viability of the allocation is dependent on cross-subsidy from housing and the economics are such that it is very unlikely that disaggregation of the marine hub element from the housing element, with delivery of the housing elsewhere, could provide the same or a similar level of cross-subsidy.
- 8.8 The City Deal⁹⁴ grant did not provide for full Government funding of these works, with the Government grant (£48.75m) (and associated MoD Land transfer provisions) to be accompanied by estimates of local capital investment of £42.7m and a further £87.8m in developer contributions.
- 8.9 Proposals for the development of Tipner West and Horsea Island East have consistently shown a significant financial deficit to varying extents. This is principally by reason of the cost of significant enabling works required including sea defences, land raising for flood prevention and site decontamination.⁹⁵ Furthermore, with approximately 4.9ha of the site area reserved for marine hub development, the area available for (higher value) residential is limited. The project aspiration had been to get the financial viability position to a level that is as close as possible to £30k subsidy per dwelling, as this has been deemed a level capable of supporting further Grant funding from Homes England based upon direct discussion between the promoter team and Homes England.
- 8.10 The PLP3 allocation is substantially reduced in scale from the previous 'Super Peninsula' proposal, which involved substantial land take from the SPA/Ramsar site of up to 27ha of reclamation and was ruled out by the City Council in October 2022 on account of the permanent loss of, and significant harm to, the integrity of the relevant Habitats sites. However, the result of rejecting this option is that project viability is more challenging.
- 8.11 Full Council took the decision in December 2023 to shortlist two options (Options A and B) as depicted at Figures 5 and 6 above. Both shortlisted options are (subject to evidence on viability and feasibility) potentially consistent with the PLP3 allocation and assume no more than 0.5 ha of subtidal reclamation from the harbour, with option B also developing the terrestrial SPA/Ramsar to the south of the Firing Range on Tipner West. It should be noted that neither Option is specifically committed to in Policy PLP3. In any event, taking a precautionary approach, the HRA is undertaken with reference to the maxima of the ranges outlined in the policy (i.e. 1,250 homes).
- 8.12 Notwithstanding the lengthy shortlisting process during 2023, the relative financial position of the promoter's two remaining options A & B (based upon information available at the time of writing this report) remains one of significant viability deficit:
- For Option A (815 homes; 58,000sq m marine hub; no development of the terrestrial SPA/Ramsar; circa 0.5ha of reclamation) - this amounts to circa £107-£116m deficit (this assumes £22k-£24k Homes England grant per dwelling);
 - For Option B (935 homes; 58,000sqm marine hub; development of 3ha of terrestrial SPA/Ramsar; circa 0.5ha reclamation) - this amounts to circa £50m-£74m deficit (assuming Homes England grant of £29k per dwelling).
- 8.13 Further discussions are ongoing between the Council and central Government to explore opportunities to reduce the deficit, and there is some optimism that the viability case can be improved, but it currently appears unlikely that any policy-compliant delivery of PLP3 will be possible without significant subsidy.
- 8.14 The result is that the assessment of alternative solutions to each element of the proposal, as conducted below, is somewhat theoretical. The financial reality is such that it is likely the allocation will be delivered as a package or not at all. Severing or disaggregating individual components from the package (in particular

⁹⁴ <https://www.gov.uk/government/publications/city-deal-southampton-and-portsmouth>

⁹⁵ Promoter viability studies do not currently allow for costs of bridge construction. They include the estimated cost of compensatory habitat, including at HIE.

the co-located housing element which is the primary source of cross-subsidy funding) is very likely to result in a significant increase in the viability deficit and undermine the delivery of the project objective.

Alternative solutions to the flood prevention and sea defence elements of the Tipner West & Horsea Island East allocation

- 8.15 A key feature of the Tipner West & Horsea Island East strategic allocation is the enablement of works to bolster existing sea defences to provide protection from inundation to the Stamshaw area of Portsea Island and protection from leachate contamination to Portsmouth Harbour and its nature conservation sites. Relevant authorities in England and Wales have a duty to have regard to the requirements of the Habitats Directive and the Wild Birds Directive, including the obligation to take steps to avoid pollution to, or deterioration of, protected habitats. As such, there is a need to ensure the effective protection of Portsmouth Harbour from leachate contamination. This section outlines relevant evidence relating to the absence of alternative solutions which could deliver that protection.
- 8.16 The Portsmouth Harbour and SPA/Ramsar sites are covered by 'Hold the Line' policies within the adopted North Solent Shoreline Management Plan 2010 (SMP)⁹⁶ which was subject to Appropriate Assessment and a positive Derogations decision in April 2011⁹⁷. The 'Hold the Line' policy extends for all three 'Epochs' covering a 100-year period (Epoch 1: 0 to 20 years; Epoch 2: 21-50 years; Epoch 3: 51-100 years). 'Hold-the-Line' means that it is necessary to maintain or upgrade the level of protection provided by existing coastal defences. The SMP has undergone recent review, and no formal changes to policy or management strategies are currently envisaged with regard to the 'Hold the Line' approach for Portsea Island. As site conditions are not considered to have materially changed since the confirmed positive IROPI decision in April 2011, strong weight can be placed on the policies within the SMP.
- 8.17 The SMP covers the 386km shoreline from Selsey Bill to Hurst Spit including Southampton Water and Portsmouth, Langstone and Chichester Harbours. The majority of these harbours and existing sea defences are covered by/adjacent to designated Habitats sites forming part of the National Site Network. The Tipner West and Horsea Island East landmass edge comprises a focused policy cell 5aP101 (Portsea Island) in the SMP. The consideration of alternatives to the 'Hold the Line' policy in the SMP HRA therefore remains relevant to the consideration of alternative solutions to the flood prevention/sea defence elements of the Tipner West & Horsea Island East allocation.

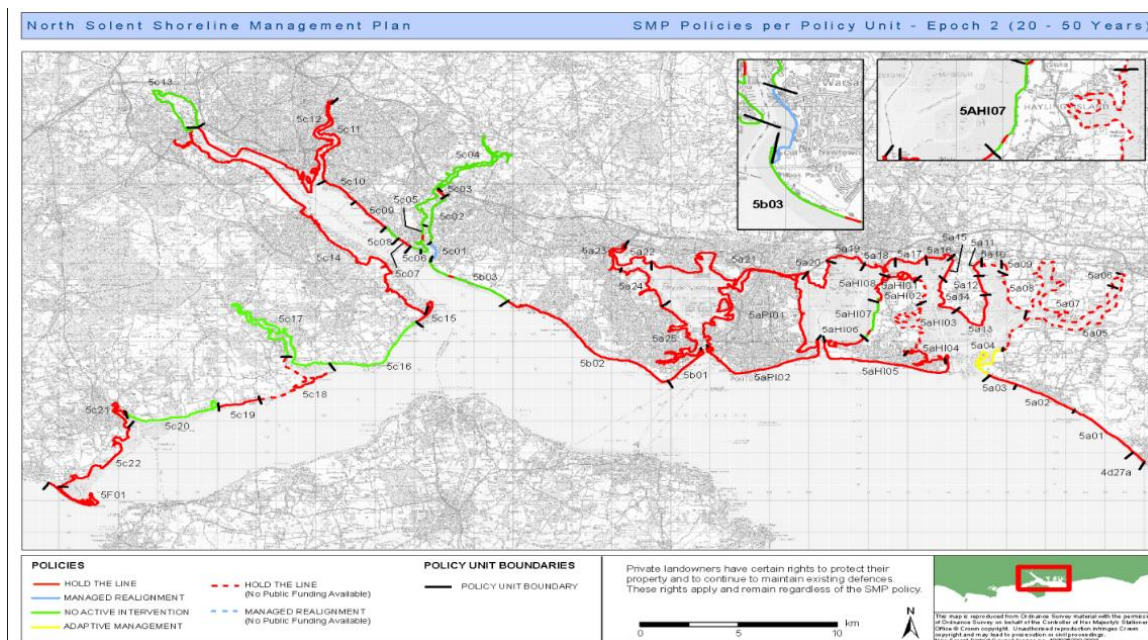


Figure 7: Extract from North Solent SMP, showing Hold the Line policy cells.

⁹⁶ [Shoreline Management Plan - Shoreline Management Plan \(northsolentsmp.co.uk\)](http://northsolentsmp.co.uk)

⁹⁷ [North Solent SMP IROPI decision confirmation.pdf \(northsolentsmp.co.uk\)](http://northsolentsmp.co.uk)

No Active Intervention

8.18 The No Active Intervention alternative solution as set out in the SMP considered the implications for Portsea Island as a whole. This would comprise Portsmouth City Council ceasing any coastal defence works on Portsea Island. The existing defences would gradually fall into decline. In the longer term there would be extensive flooding in two flood risk areas on the island, together with further flooding in a number of other locations adjacent to the coast. In addition to the direct risk of flooding to human health, this policy would affect large residential areas as well as commercial, industrial, military, harbour and infrastructure interests. The number of residential properties at risk would be at least 208 (Flood zones 2 and 3), of which 162 would be in Flood Zone 3 (see Figure 8 below). Historical assets including Scheduled Monuments, listed buildings, conservation areas and other heritage interests would also be affected. For Tipner West and Horsea Island East, this would result in the flooding of five Grade 2 Listed assets.

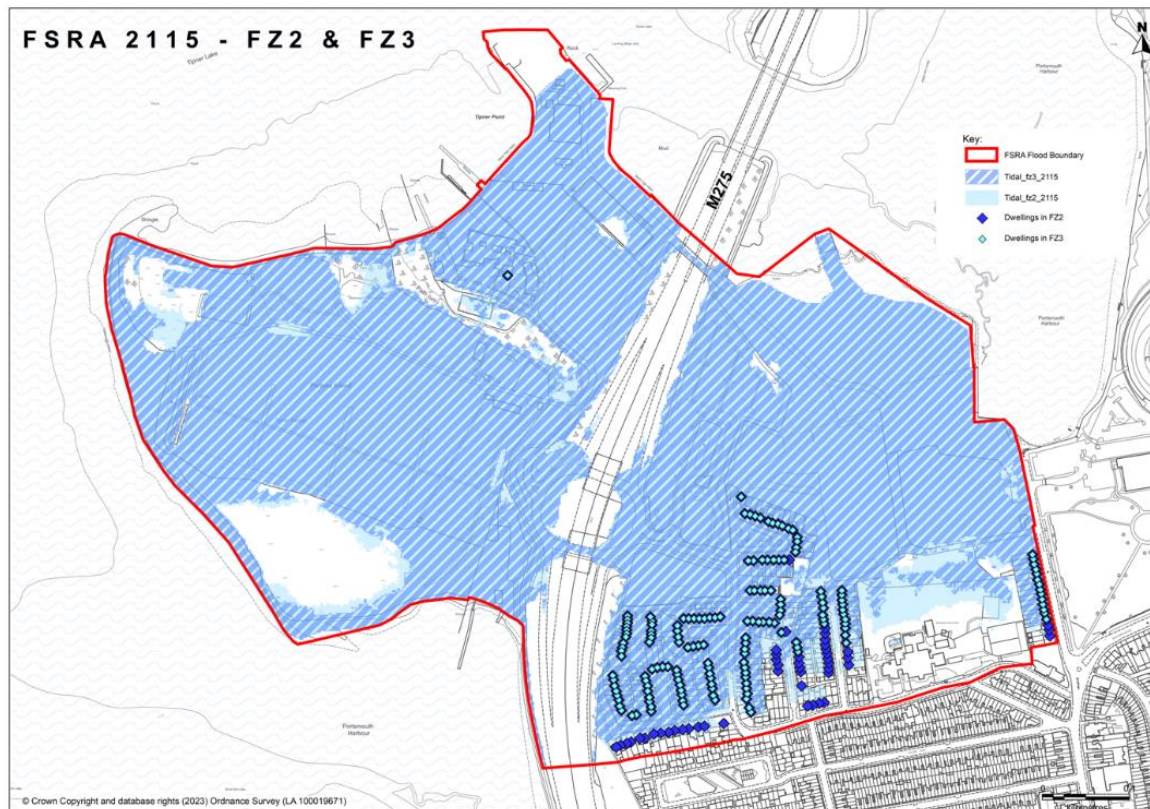


Figure 8: Flood Extent 2115⁹⁸

- 8.19 Under a 'No Active Intervention' policy, erosion would also occur whenever the existing defences reach the end of their residual lives. There are a number of locations around the island where this erosion would be particularly significant, notably at the former Tipner Firing Range. Although erosion would be relatively minor at this location due to the particularly sheltered coast, the heavily contaminated nature of this promontory means that any erosion would be a notable threat to the natural environment interests in the harbour.
- 8.20 Much of the coastal margin of the wider Portsea island has been reclaimed from the sea with potentially contaminated material. This includes Tipner West. Flooding would release contaminants whilst defence failure and erosion would lead to contaminated material falling into harbour waters, threatening natural environment interests. There would also be the un-mitigated or non-compensated loss of core functional supporting habitat on the Tipner firing range, as identified in the Solent Waders and Brent Goose Strategy⁹⁹. The impact of non-intervention is considered to be both socially and environmentally unacceptable.

⁹⁸ Strategic Flood Risk Assessment, PFSH 2016); <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/strategic-flood-risk-assessment/>

⁹⁹ [Solent Waders & Brent Goose Strategy – coastal bird conservation, waders and brent geese data and mapping \(wordpress.com\)](https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/strategic-flood-risk-assessment/)

Do Minimum

8.21 In the absence of the Portsea Island strategy as set out in the SMP, there would be no planned improvement to the flood defences but there would be continued maintenance and urgent repair of defences. In this scenario, defence works would be identified purely on the basis of immediate need, determined by emergency failures (breach or overtopping). The lack of planning and foresight in the delivery of such flood risk management would result in isolated, but increasingly frequent, flood events through breaches and overtopping, which could lead to social and commercial disruption, loss of confidence by developers/investors, widespread outward migration of people/businesses and potential loss of life. In the long-term, emergency patching would cease to become effective and defence standards, such that impacts would ultimately be similar to those of the 'No Active Intervention' scenario.

Managed Realignment

8.22 The Portsea Island Coastal Strategy Study Statement of Case in respect of the effects on European Sites June 2009 (produced by Halcrow on behalf of the Environment Agency)¹⁰⁰ notes that "*...the deliberate set-back of defences around Portsea Island is not practicable because all coastal land is occupied by buildings, public open space and/or contaminated sites such as landfills.*" The latter is particularly the case at Tipner. The same document goes on to point out that "*...an initial assessment (Halcrow, 2004) was undertaken to determine the costs associated with remediating areas of contamination that would be affected by coastal flooding in the event that defences were realigned or not maintained. These assessments indicated that remediation costs for Portsea Island would be in the region of £750 million. These costs are far in excess of the potential costs associated with developing new sites for compensatory habitat in noncontaminated areas and demonstrate that localised retreat options are not economically viable.*"

Alternative delivery of “hold the line” at Tipner West & Horsea Island East

8.23 The Shoreline Management Plan establishes a policy to 'Hold the Line' of sea defences around the existing Tipner West and Horsea Island East landmass but does not provide funding to support the delivery of these defences. The estimated cost of strengthening or replacing the existing sea defences at Tipner West and Horsea Island East is £35m. The Council does not currently have funds available to deliver the sea defences from its core budget: see recent reports to Full Council on the allocation which highlight the significant fiscal limitations upon the Council, governed by the Prudential Code¹⁰¹.

8.24 Funding for flood and coastal erosion risk management (FCERM) is available from a variety of sources:

- The Environment Agency (EA) manages some risk directly, and also provides capital grants to local authorities for flood defence improvements. The EA currently has no plans to carry out flood risk improvements at Tipner West & Horsea Island East, and there is no current prospect of grant funding from the EA.
- Defra and the EA offer partnership funding to local communities, developers, businesses and local authorities who can raise funds towards a coastal defence project. There is currently no local community or business likely to pitch for partnership funding and the Council does not currently have funds available to offer a share of partnership funding. Even if it could, partnership funding from Defra/the EA is not guaranteed.
- Defra offers a flood recovery grant but – if available – this would deliver a modest sum in the context of the full costs of the flood defences.

8.25 The result is that there is no current prospect of external funding, or core-budget Council funding, to deliver the necessary flood defences. The Council also has no current mechanism to raise funds for the flood defences through the CIL and any new mechanism would be unlikely to be raise sufficient funds early enough in the plan period. The City Deal recognised that the cross-subsidy of development income, in particular from residential development, was necessary to assist in the delivery of the sea defences at Tipner West alongside the 'pump-priming' grant from Government.

8.26 Accordingly, the Council's strategy has been to secure delivery of necessary sea defences through developer-funding as a condition of the development of land: see Tipner East as another example of where sea defences are being delivered by way of s.106 developer funding.

¹⁰⁰ see CDL at: <https://www.portsmouth.gov.uk/newlocalplanevidence>

¹⁰¹ <https://democracy.portsmouth.gov.uk/documents/s50877/240223%20-%20Tipner%20Cab%20update%20FINAL.pdf>

The Tipner West & Horsea Island East allocation

8.27 The new flood defences required under Policy PLP3 will enable the development of this strategic site and thus fulfil the Local Plan vision for a new healthy and happy community. New climate change resilient sea defences will defend the community alongside the existing residents of north Portsea Island. And the new sea defences will provide effective protection to the Portsmouth Harbour SPA/Ramsar site from the risk of leachate contamination, consistent with the need to ensure the effective protection of SPAs from pollution.

Alternative solutions to the site decontamination elements of the Tipner West & Horsea Island East allocation

8.28 The provision of sea defence infrastructure and site decontamination around Tipner West & Horsea Island East delivers a number of clear benefits, one of which is the prevention of leachate contamination from the site to the waters of Portsmouth Harbour and the protected habitats that depend upon it.

8.29 There are not considered to be any feasible alternatives to this work. As evidenced in geotechnical site investigations undertaken on behalf of the PCC Promoter team¹⁰² significant site contamination exists and includes, inter alia, asbestos, PAHs, metals and unexploded ordnance, especially so on the Tipner West landmass. The contamination is present and if nothing is done to address it, over time these contaminants would leach directly into the harbour waters and risk significant harm to the integrity of the SPA and Ramsar habitat, given the modelled flooding risk for the site. Sea defences and decontamination of the land must therefore take place in tandem if it is to be developed for future land uses, especially for any human habitation. The land raising required across most of the site, which would serve to provide protective capping to much of this contamination, is the principal method of mitigation recommended in these reports. The cost of such works, including necessary land raising, has been estimated to be in the order of £15m.

8.30 As above, there is no core Council funding available to cover the cost of the decontamination work and no current prospect of any grant funding, notwithstanding the requirement to take steps to protect the Harbour from pollution.

8.31 One alternative solution could comprise the diversion of capital expenditure to the decontamination of the land only rather than to combine sea defences and decontamination, thereby removing leachate risks to the protected habitats of the Harbour and potentially allowing for a managed realignment. However, this has been expressly discounted in the Shoreline Management Plan and in reality, the incurring of such works in the absence of concurrent or preliminary sea defences would be of limited public or environmental benefit in the longer term where modelling makes it clear that the whole Tipner peninsula would be flooded under a 0.5% Annual Exceedance Probability scenario¹⁰³. This would represent a significant dereliction of duty by the City Council, not least as lead local flood authority. As also recognised in the City Deal award¹⁰⁴ Government has stipulated a commitment for the City Council to deliver both sea defence construction and site decontamination in tandem, in readiness for development.

8.32 The decontamination works proposed as part of the Tipner West & Horsea Island East allocation will, in conjunction with flood defences, protect the Harbour from contaminant leachate and will enable the development of this strategic site to fulfil the Local Plan vision for a new healthy and happy community.

Alternative solutions to the Marine Employment Hub element of the Tipner West & Horsea Island East allocation

8.33 The marine employment hub allocated in Policy PLP3 of the Local Plan would involve the dredging of approximately 2.1ha of intertidal habitat to achieve a deep water channel and could (depending upon viability and feasibility at the planning application stage) lead to the loss of up to 0.5ha of intertidal habitat within the SPA/Ramsar site, through land reclamation. As set out in Policy PLP3 any land reclamation will only be supported by the Council if it is essential to the viability or feasibility of the overall proposal. At the strategic land-use planning level, the alternative solutions to be considered are:

- Do Nothing

¹⁰² DRAFT WSP Technical Notes: "Tipner West Outline Remediation Approach" (Feb 2024) and "John Henry Pounds Contamination Summary and Listed Buildings" (Feb 2024)

¹⁰³ <https://democracy.portsmouth.gov.uk/documents/s41718/APP%20C%20-%20211126-%20TRP%20-%20Full%20Council-%20Report%20Dec%202021.pdf>

¹⁰⁴ <https://www.gov.uk/government/publications/city-deal-southampton-and-portsmouth>

- Deliver at an alternative location (within the Solent sub-region)
- Disaggregation of the proposed marine employment hub; and
- Alternative locations on the Tipner peninsula.

Do Nothing

- 8.34 A 'Do Nothing' scenario will not deliver the plan objective because no new (market-led) marine employment will occur on the site. Furthermore, it will squander one of a limited number of critical waterfront marine employment sites that have been identified by the Solent LEP (now "Solent Partners") as being capable of transitioning to marine employment, thereby undermining national and regional strategies aimed at expanding the marine sector.
- 8.35 Extensive work has already been undertaken on behalf of the project promoter team by Marina Projects Limited (MPL) and is captured in their report "*Marine Employment Alternatives, Tipner Regeneration Programme, July 2020*"¹⁰⁵. The MPL report referenced findings from the Solent LEP report "*Maritime Futures: Solent Waterfront Sites (2015)*",¹⁰⁶ noting that many of the Solent waterfront sites (identified in Fig 14 below), including *Vestas*, *Daedalus* and *Kingston Marine Park* are located next to very shallow water and are, unlike at Tipner West, unable to provide full tidal access. The Maritime Futures report was commissioned as a result of concerns raised by marine and maritime businesses that valuable waterfront land was being lost to alternative development, in particular to residential uses. It concluded that, of 97 waterfront sites studied, a total of 23 are ranked as 'Tier 1' (23.7%), the majority are established use without potential for growth and only four "Tier 1" sites remained under-developed for marine and maritime use. This equates to just 4.1% of the total number of waterfront sites across the Solent region.
- 8.36 The MPL report concludes that only the Tipner West site meets all core criteria in terms of site area, full deep water tidal access, boat lifting facility of 600-700 tonnes, sufficient open yard storage, up to 58,000sq m marine employment space, a total site area of 9-10ha and ultimately comprises a potential marine employment hub of regional significance.
- 8.37 For the avoidance of doubt a Do-Nothing scenario, in respect of the marine sector elements, will lose the ability to:
- provide 1,900 Full Time Equivalent jobs on-site that would be provided by the proposed development;
 - utilise a critical marine employment opportunity that has the attributes to deliver strategic marine sector growth through development at the site;
 - address local deprivation through employment and skills growth as well as meeting housing need; and
 - enhance marine sector skills.

Deliver at an alternative location (within the Solent sub-region)

- 8.38 In respect of the consideration of alternative marine hub locations, the MPL report and the Marine Futures report highlighted that an alternative must be in the Solent sub-region to meet the identified project needs, objective and address local/regional policy delivery. Furthermore, the national and regional policy support makes the case strongly that the Solent has an established reputation as the UK's centre of excellence for marine and maritime industries.
- 8.39 The 2016 LEP Waterfront Assets Register was compiled to identify and assess existing sites in order to inform policy makers, including local planning authorities in preparing their development plans. The report notes the importance for strategic planning and identifies a total of 97 sites with a combined area of 1,730 hectares used or available for waterfront employment in the Solent area. Importantly, these sites are located within 7 clearly defined "clusters" across the region. Of this supply:

¹⁰⁵ See Appendix B at

<https://democracy.portsmouth.gov.uk/documents/b14699/Tipner%20West%20Full%20Council%20Update%20-%20Appendices%2006th-Dec-2021%2013.00%20Cabinet.pdf?T=9>

¹⁰⁶ https://solentlep.org.uk/media/1341/maritime_futures_-_solent_waterfront_sites_-_169_15_.pdf

- only 100.7ha (less than 6%) was undeveloped waterfront land and spread across several sites.
 - only around 10ha (0.5% of the total) is undeveloped waterfront land with permanent waterfront access (applying the report's definition), again spread across several sites.
- 8.40 The LEP register also undertook an assessment for each of the waterfront assets based on three defined criteria: (1) Marine Access, (2) Presence of Marine & Maritime Activities and (3) Development Potential. Tipner West was identified in the site's register as a 250,000m² (25ha) site that has been categorised as a first tier "Prime Site" within Portsmouth Harbour. As noted, the register defines "Tier 1" as "sites of prime importance for marine & maritime activities within the Solent region". It is particularly pertinent that of the 97 waterfront sites identified by the register, only 4 such sites were identified as being under-developed for marine and maritime use, these being:
- Tipner West
 - Spitfire Quay, Southampton
 - Lower William Street, Southampton; and
 - Vestas Technology Park, Newport, Isle of Wight.
- 8.41 The LEP study also identified 6 further Tier 1 sites, already established in marine use but with potential for growth, these being:
- Royal Clarence Yard, Gosport
 - Daedalus Enterprise Zone, Lee-on-the-Solent
 - Centenary Quay, Southampton
 - Marchwood Industrial Park, Southampton
 - Venture Quays, Cowes, Isle of Wight; and
 - Medina Yard, Isle of Wight.
- 8.42 In December 2019, further assessment by MPL of potential alternative locations added a further 4 sites to this list which comprised limited vacant land or otherwise unavailable:
- Priddy's Hard, Gosport
 - Fawley Waterside, Southampton
 - Baker's Wharf, Southampton; and
 - Eling Wharf, Southampton.
- 8.43 However, several of these sites were either too small (being around 2ha), lacked permanent water access (drying at Mean Low Water Springs (MLWS))WS), distant from deep water and with no means to get vessels ashore. The outcome of the 2019 MPL assessment is summarised in Table 4.

| Attribute | Do Nothing | Tipner | Royal Clarence Yard | Centenary Quay | Vestas Newport | Fawley Waterside | Marchwood Industrial Park | Daedalus | Kingston Marine Park |
|---|------------|--------|---------------------|----------------|----------------|------------------|---------------------------|----------|----------------------|
| Existing depth (Chart Datum) | n/a | -3m | -4m | -2m | +1.5m | -1.5m | -3m | N/A | +4m |
| Available site area (ha) | n/a | 9 | 2.31 | 3.18 | 3.75 | 6 | 6.2 | 83 | 6 |
| Deliver full tide access | x | ✓ | ✓ | ✓ | x | x | ✓ | x | x |
| Develop a large boat lift facility in the order of 600-700 tonnes | x | ✓ | x | x | x | ✓ | ✓ | x | x |
| Ensure an appropriate level of open yard storage | x | ✓ | x | x | x | ✓ | x | ✓ | x |
| Provision of circa 58,000m ² marine employment space | x | ✓ | x | x | x | x | x | ✓ | x |
| Site area 9-10Ha | x | ✓ | x | x | x | x | x | x | x |
| Provide a regionally significant marine employment hub | x | ✓ | x | x | x | x | x | x | x |

Table 5: Alternative Solent marine hub sites (MPL, 2019)

8.44 While the MPL assessment was prepared on behalf of the project promoter team, it is well evidenced and reasoned. It is also supported by the independently published Solent LEP report. Together they suggest that the Tipner West and Horsea Island East site is the only site that can deliver a regionally significant marine hub, addressing identified shortcomings in the Solent in terms of deep water access, site area, boat lift facility, open yard space and scope for around 58,000sqm marine employment floorspace in line with City Deal aspirations.

Disaggregation of the marine hub site components

8.45 Disaggregating the various components of such a hub would risk the loss of the above immediate inter-relationships and result in the disbenefits identified in the majority of other marine sites considered in the Solent LEP report. Indeed, it is the very purpose of the Southampton and Portsmouth City Deal to "maximise the impact of marine and maritime assets" and "...to deliver 58,000sq m of employment space for the growing marine and advanced manufacturing sectors of the Solent economy".¹⁰⁷ This is in recognition that the marine and maritime sector accounting 20% of the Solent functional economic area and for 17% of UK gross value in the sector nationally.

8.46 Consultation with marine sector stakeholders, as noted in the MPL *Marine Sector Market Summary* highlighted that marine businesses invariably require a range of facilities, including production bays, office space, indoor and outdoor storage, space for craneage, wide range of power supply, space for deliveries as well as deep water access and the various sectors attracted by the potential for co-located sub-sector businesses, such as repair/refit, marine technology, large composites, race boats, learning resource and other bespoke businesses at the forefront of the growing marine sector. The ability to combine this range of facilities and business categories with the capacity for the lifting and holding of vehicles above 200 tonnes, was seen as particularly attractive and the co-location of such marine functionality would maximise supply chain opportunities and exponentially spur growth in the sector.

8.47 It should also be noted that co-location with non-marine land uses would give rise to additional risks associated with noise, access and negative implications for economies of scale, noting the 'Agent of Change' principle¹⁰⁸ applying in this scenario. This means that developments of new sensitive land uses (residential) introduced into locations comprising noise-generating land uses will be expected to compensate those existing land use occupiers against potential future claims of disturbance by residents and/or to cover the cost of noise mitigation measures to secure acceptable living conditions.

8.48 These are just a few of the many reasons why dis-aggregation of the proposed marine hub would continue to frustrate the growth needs of the UK's marine sector. These will be set out in more detail in the project-level HRA in due course. It also shows why the opportunities afforded at Tipner for a world class marine hub have been recognised in the City Deal for some time.

8.49 The project promoter has provided an indicative illustration of how a marine hub at Tipner might be laid out and is shown in Figure 9 below, with a schedule of indicative land uses provided in Table 5. The full details

¹⁰⁷ [City Deal: Southampton and Portsmouth - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹⁰⁸ <https://www.gov.uk/guidance/noise-2#:~:text=In%20these%20circumstances%20the%20applicant,adverse%20effect%20on%20new%20residents%2F>

of the nature of the floorspace, potential occupants, and the land reclamation identified would all need detailed justification from the site promoters at the planning application stage.

| Marine Hub Floorspace Allocation | Sq M (indicative) |
|----------------------------------|-------------------|
| Workshops | 10,500 |
| Boatsheds | 5,750 |
| Storage | 2,100 |
| Boatyard offices and workspace | 17,900 |
| Complimentary marine hub offices | 21,500 |
| Other ancillary | 250 |
| TOTAL | 58,000 |

Table 6: Proposed indicative marine hub floorspace schedule

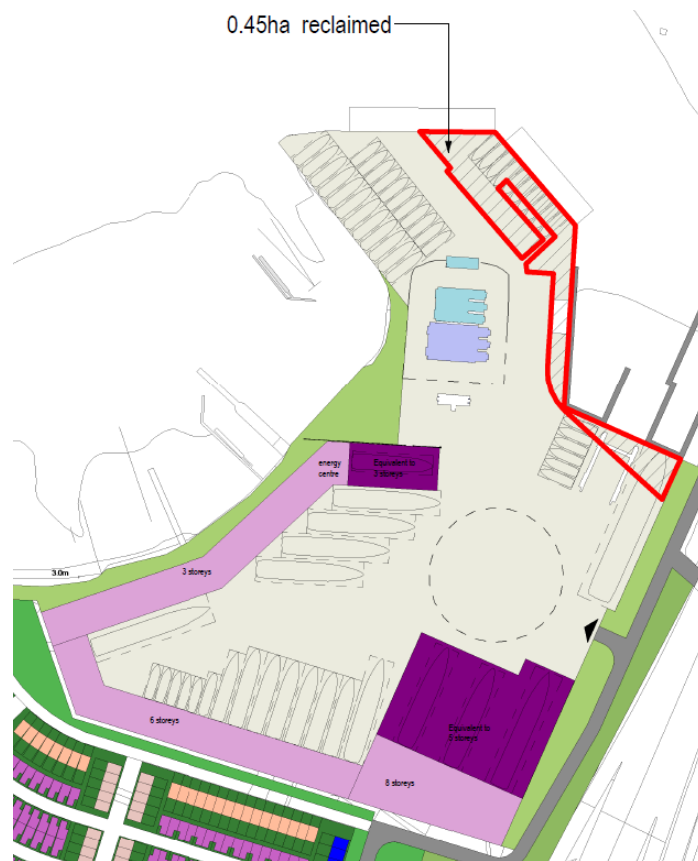


Figure 9: Illustrative layout for marine employment hub

Alternative marine hub locations on the Tipner West peninsula

8.50 The MoD has indicated that commercial development might be permitted on Horsea Island East, subject to limitations on building height, location and distance of habitable room windows and secure boundaries. Nevertheless, project-level optioneering studies undertaken by the promoter team in 2023 have concluded that there are more disadvantages in splitting the marine hub across both Tipner West and Horsea Island East, for the very reason that this removes the benefits of co-location and function outlined above. The MPL studies to date have very quickly confirmed the clear benefits associated with the northern quadrant of the Tipner West site exclusively hosting the marine hub (as illustrated above) not least due to the immediacy of deep-water access.

Alternative solutions to the bridge element of the Tipner West & Horsea Island East allocation

- 8.51 Local Plan policy PLP3(1)(c) allocates "A bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only." Different designs of bridge are available, some of which could avoid any direct loss of habitat. However, this assessment proceeds on the basis that the bridge will involve piers within the intertidal environment that would result in the loss of up to 0.3ha of intertidal habitat loss within the Portsmouth Harbour SPA/Ramsar. Policy PLP3 makes it clear that any such habitat loss would only be supported if it could be shown that it was not viable or feasible to avoid such loss.
- 8.52 Due to its location, currently only easily accessible via the Strategic Road Network, the Council both as a Local Planning Authority and Local Highway Authority has recognised and created policy to support the new transport infrastructure needed to support the long standing aspiration to develop parts of the Tipner and Horsea areas for housing and business, which should facilitate travel by sustainable modes. Further information on this is set out in the Council's *Tipner-Horsea Bridge Transport Position Paper June 2023*¹⁰⁹.
- 8.53 In 2010 The Western Corridor Study¹¹⁰ examined options for infrastructure to improve accessibility. Its recommended transport strategy included a bridge from Tipner to Horsea, restricted to use by buses and other sustainable modes, together with a new bus route from Portsmouth to Fareham via Tipner and Port Solent. The alternatives essentially amount to 'Do Nothing' (i.e. to have no bridge) or alternative bridge alignments which are considered to be a matter of detail to be addressed as part of the project-level HRA.
- 8.54 Nevertheless, alternative alignment options for the bridge have already been assessed at length in the Council-commissioned report in 2010¹¹¹. The conclusion of that report was that the optimal alignment would be for a structure that runs immediately parallel to the M275 flyover (and physically connected to it), minimising environmental impact and optimising construction and cost efficiencies. Recent analysis in 2023 by WSP on behalf of the project promoter team, has reaffirmed this approach, with an exception being that the bridge corridor (and access way) north of Tipner Lake would continue parallel to the M275 and east of the balancing pond and proposed public open space (on the former landfill site) (see Figure 10 below).

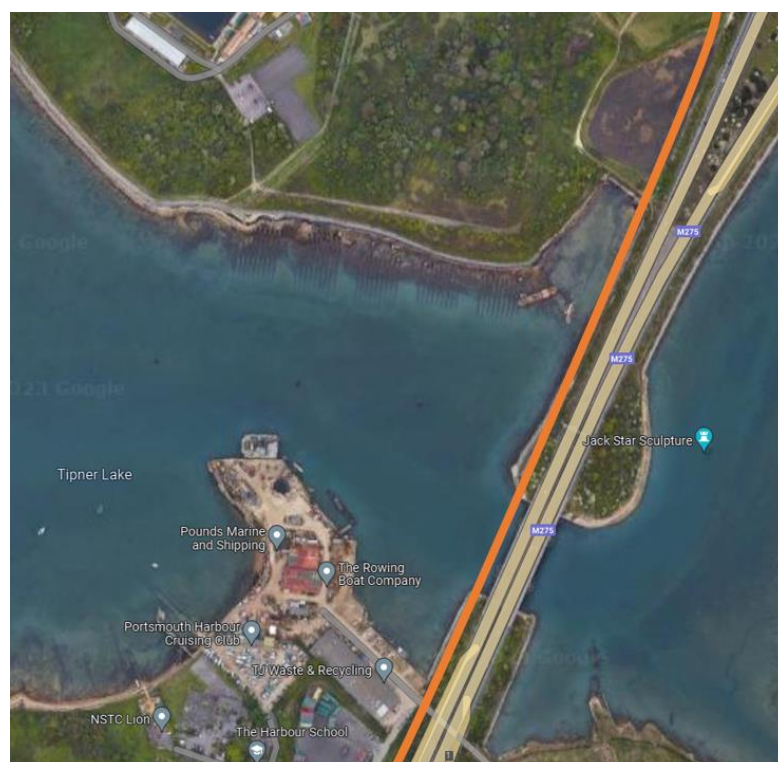


Figure 10: Anticipated Bridge Alignment

¹⁰⁹ see CDL at: <https://www.portsmouth.gov.uk/newlocalplanevidence>

¹¹⁰ [development-and-planning-western-corridor-transport-study.pdf \(portsmouth.gov.uk\)](#)

¹¹¹ Peter Brett Associates report (2010) - see CDL [City Deal: Southampton and Portsmouth - GOV.UK \(www.gov.uk\)](#)

- 8.55 A 'Do Nothing' alternative would fail to address the needs identified in the Council's *Tipner-Horsea Bridge Transport Position Paper* (June 2023)¹¹², resulting in continued reliance by residents and workers of less sustainable transport choices for accessing Portsea Island (via the M275 by private car) and reduced options for new bus routes, emergency service vehicle routes, continuation of congestion at Port Way and consequent longer term pressure on carbon reduction strategies, contrary to the Portsmouth Transport Strategy (LTP 4, 2021-2038) and TfSE Strategic Investment Plan¹¹³.

Alternative solutions to the enabling development component in the form of housing of the Tipner West & Horsea Island East allocation

- 8.56 As has been outlined above, and as recognised in the City Deal grant, the delivery of necessary flood defence and site decontamination works, the marine hub and other significant infrastructure (including the bridge) can only be delivered through additional sources of funding as the project remains in negative financial viability based upon financial modelling undertaken by the project promoter. Whilst the promoter team continue to seek additional sources of grant funding, it is imperative to demonstrate on-site enabling development opportunities to reduce the viability gap. As noted in the 'Do-Nothing' scenario below, the costs associated with providing the necessary flood defence, site decontamination and land raising alone exceed £200m. Whilst some funding may be sourced via bespoke grant, such as the DEFRA flood recovery grant¹¹⁴, these are expected to deliver extremely modest sums in the context of the residual funding gap that exists and the expansive nature of the flood risk. Enabling development opportunities must therefore be explored to assist delivery of these works as expected in the City Deal award.
- 8.57 At the time of writing (February 2024), housing delivers the highest value land use for the purposes of enabling development, notwithstanding enhanced growth in other sectors, such as warehousing. This is also evidenced in Government Land Value Estimates for policy appraisal 2019 (*source: MHCLG, now DLUCH*)¹¹⁵ with residential values double those for industrial (£3m/ha compared to £1.5m/ha). Other uses would almost certainly deliver even lower returns. For example, it has been suggested that the site south of the proposed marine hub, namely the existing functionally linked habitat (site P60) and land south of the firing range, could provide longer term mitigation income from the City Council (in partnership with the Solent Recreation Mitigation Partnership¹¹⁶), through mitigation strategies such as that already in place for the Solent Recreation Mitigation Strategy. However, this approach would not be expected to deliver anything like the funding revenue from residential land use. The Bird Aware website refers to £2m generated every 5 years for capital projects, which would fall well short of the viability deficits currently identified for the Tipner West and Horsea Island East project.
- 8.58 The Housing & Economic Development Needs Assessment (HEDNA) and the Housing & Economic Land Availability Assessment (HELAA) that form the main evidence base on employment and are referenced in chapter 7 of the draft Local Plan, make it clear that the supply of employment sites in the City is constrained. However, the combination of sites with extant planning permission and Local Plan allocations including the marine hub at Tipner West & Horsea Island East would deliver the necessary floorspace of B8/B2 uses (64,514sqm). Office space can be delivered at the City Centre and Lakeside but there remains significant caution on over-provision of floorspace in this sector due to the shift to working-from-home and hybrid working since the pandemic. With regard to the provision of retail uses at Tipner West, these would fail both the sequential and impact tests being in an out-of-town location. In order to provide a sufficient quantum of retail floorspace as enabling development necessary to materially reduce the viability constraints at Tipner, it would be at risk of fundamentally undermining the Plan's town centre strategy and be contrary to the NPPF. Whilst the other option could be to explore a wider expansion of the marine hub (beyond the 58,000sqm envisaged, pursuant to City Deal), there is no indication that this is necessary (see analysis above) and with housing most likely to deliver the higher land value it has not been considered further.
- 8.59 Depending on the number of dwellings and the masterplan that comes forward at the planning application stage, delivery of housing could involve the loss of up to 3.6ha of high-tide terrestrial roosting habitat south of the firing range. It should be noted that this is not a requirement or inevitable outcome of delivery of PLP3

¹¹² See CDL *City Deal: Southampton and Portsmouth - GOV.UK* (www.gov.uk)

¹¹³ <https://transportforthesoutheast.org.uk/app/uploads/2023/03/SIP-1.pdf>
<https://www.portsmouth.gov.uk/wp-content/uploads/2021/11/74.633-Local-Transport-Plan-2021-Final-Accessible.pdf>

¹¹⁴ <https://www.gov.uk/government/publications/flood-recovery-framework-guidance-for-local-authorities-in-england/flood-recovery-framework-guidance-for-local-authorities-in-england>

¹¹⁵ <https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2019>

¹¹⁶ <https://birdaware.org/solent/>

but it has been assumed in this assessment because, subject to evidence on viability / feasibility, it remains a reasonably likely outcome of the allocation. Delivery of housing on this site has always been a critical element of the package, without which it would not be sufficiently viable (allowing for reasonable assumptions of additional grant funding being levered-in to the project, such as from Homes England). There is also significant unmet housing need in Portsmouth on account of highly constricted land supply, and that need will not be met by the housing provision in the PLP. The delivery of more homes is clearly a national priority for the Government.

Do Nothing

- 8.60 All development options considered to date have demonstrated a significant negative viability position for the City Council, including a deficit of £48.75m for a 'Do Nothing' alternative solution (City Deal grant to be refunded to Government). It is also the case that additional grant funding will continue to be required and negotiations with Government departments, together with Homes England, continue in this regard. Since October 2022, Full Council has resolved to commit to minimising reclamation from the SPA/Ramsar designated sites. However, significant site enabling costs associated with implementing the City Deal could be in excess of £200m. The City Deal has in any event been premised upon the need to make the Tipner West and Horsea Island sites ready for sale to *'one or more private sector developers'*.
- 8.61 The optioneering process has focused upon broad land-use locations, application red line extent and, if necessary, any reclamation that might be sought from intertidal SPA/Ramsar sites. With the exception of the "Do Nothing" option, all options include variable quantities of residential development which, as noted above, provides essential cross-subsidy 'enabling' funding for the necessary flood defence and site decontamination works. The City Deal did not provide for full Government funding of these works. There is no basis on which any of the benefits of the allocation could be delivered in the absence of enabling development contributing to the financial viability of the allocation.

Providing housing elsewhere

- 8.62 Theoretically, the housing element of PLP3 could be disaggregated from the marine hub element and located elsewhere, with the income generated by that housing development applied to cross-subsidise the delivery of the marine hub and infrastructure upgrades at Tipner West and Horsea Island East. However, Portsmouth has a highly constricted land supply with much of the land that is available to build on at risk of flooding, close to international nature designations and including heritage assets. The HELAA¹¹⁷ is the main evidence base document on housing and economic land supporting the Local Plan. A robust and vigorous assessment of all potential housing sites was carried out as part of this study. The housing target set in Policy PLP16 of the Local Plan sets out all the sources of housing supply in Portsmouth including all sites of five or more dwellings identified as deliverable or developable in the HELAA. If the new homes allocated at Tipner West and Horsea Island East did not come forward on the PLP3 site, they could not be delivered elsewhere in the City. This would make the existing yearly unmet need of 219 homes in the City even greater¹¹⁸.
- 8.63 The City Council works closely with its neighbouring local planning authorities in the Partnership for South Hampshire (PfSH) on meeting sub-regional housing need and other cross boundary strategic matters. There is already agreement with Fareham Borough Council to provide 800 new homes for Portsmouth in their newly adopted Local Plan. It is highly unlikely that Portsmouth's neighbouring councils would be able to accommodate the additional 830 – 1250 homes lost from the PLP3 allocation. Moreover, it is almost certain that they would not be able to accommodate those homes on a single site, as with PLP3, or even on two or three large sites.
- 8.64 For a number of reasons, therefore, disaggregation of the housing element from the marine hub element of PLP3 is not a feasible alternative because:
- It is unlikely that there is capacity within the PfSH sub-region to accommodate an additional 830 – 1250 homes;
 - It is almost certain that, even if there was such capacity, it would not enable delivery on a single site or even on two or three large sites. As a result, the efficiencies of delivery on a single large site would be lost, with consequences for the level of cross-subsidy able to be generated.

¹¹⁷ <https://www.gov.uk/government/publications/city-deal-southampton-and-portsmouth>

¹¹⁸ Taking into account contribution of 800 homes from Fareham Borough Council, this reduces the annualised unmet need from 219 to 179.

- In order to generate a cross-subsidy, any housing delivered on alternative sites would need to be delivered by the same developer. The promoter of the PLP3 site does not currently own sufficient suitable land across the PfSH sub-region to deliver the required housing.
- Housing at the PLP3 site is likely to carry a sales premium on account of the waterside location and co-location with the marine hub, which would not be the case with alternative sites across the PfSH sub-region, with consequences for the level of cross-subsidy able to be generated.

8.65 Moreover, an fundamentally, disaggregation of housing from the marine hub element of Policy PLP3 would not deliver on the project objective which includes housing co-located with the marine hub to support the growth of the marine workforce. Indeed, the City Deal was premised on unlocking Tipner-Horsea Island fully to enable the provision of 2,370 new homes and 58,000 square metres of employment space for the growing marine and advanced manufacturing sectors of the Solent economy. This will help create over 3,700 permanent jobs. This depends on colocation of housing and employment uses.

Providing housing differently on the site

8.66 The final site layout and housing quantum is ultimately a matter for the planning application stage. The PLP3 Policy will only permit the delivery of housing to result in the loss of SPA/Ramsar habitats if – at the planning application stage – it can be shown to be necessary for viability or feasibility.

8.67 Nonetheless, considerable work has been done to date to consider the various options for delivering housing. The Portsmouth City Council project team have engaged with the local planning authority in a development optioneering process, principally through regular engagement with the Tipner West Regulatory Panel, but also directly with LPA Policy and Development Management officers. The current project work follows the cessation of work on the former 'super peninsula' as confirmed in October 2022. The optioneering stage, to identify a preferred option for the allocation that would best meet the project principles for this allocation site has broadly followed the chronology in Table 6.

Table 7: 2023 Site Promoter Optioneering Chronology in consultation with Regulatory Panel

| Date | Optioneering Stages post October 2022 |
|-------------|--|
| 2022 | |
| October | Full Council approval of Project Principles for a revised project for development at Tipner West and Horsea Island East, ruling out both the super peninsula and the do-nothing scenario. |
| 2023 | |
| January | Re-engagement with LPA Development Management case officer and update to Planning Performance Agreement (PPA) to reflect new Project Principles. Continuation of cross-party working group for consultation with the project team throughout 2023; Regulatory Panel 2023 #1 - review of updated project brief, draft overarching objective and project principles, alongside baseline survey evidence |
| May | LPA written advice in respect of promoter's draft Stage 1 Ecology Technical Report (EPR), including initial proposals for use of HIE as compensatory habitat and development of the terrestrial SPA/Ramsar. |
| June | Regulatory Panel #2 - consideration of 13 development options against project principles and consideration of updated bespoke SPA Impact Metric LPA written advice in respect of suite of ecological surveys and 13 development options, discounting 7 options. |
| July | Regulatory Panel #3 - further review of bespoke SPA metric and option viabilities. LPA written advice on SPA metric, proposed updates to the Project Principles, draft Overarching Objective, next stage of optioneering assessment criteria |

| Date | Optioneering Stages post October 2022 |
|-----------|--|
| August | Regulatory Panel #4 - Review of 6 shortlisted Options (and as broken down into 'Elements' (Land Mass, Compensation, Employment, Listed Structures); review of option screening criteria; proposed update to Project Principles |
| September | Regulatory Panel #5 - Review of 6 options against screening criteria |
| October | Full Council Approval of Updated Project Principles ¹¹⁹ |
| November | Regulatory Panel #6 - Outline of the 2 shortlisted development options for detailed evaluation Full Council approval of promoter recommendations to progress masterplanning and viability assessment of the 2 shortlisted options ¹²⁰ |
| December | LPA written advice in respect of draft proving layouts for shortlisted options and pursuant to feedback from Regulatory Panel #6. |

8.68 The Regulatory Panel has principally been engaged through 2023 in discussions around the evidence base/surveys, assessment methodologies and specific development option assessment and promoter shortlisting of options. The feedback of panel members has been recorded by way of meeting minutes and responses to specific Promoter questions raised in advance of the meetings. Presentation material has been made available to panel members on a shared website managed by the promoter team. The LPA, as competent authority for the purposes of HRA and local planning authority for the proposed TCPA planning application, has provided written advice at regular intervals.

8.69 The shortlisting of options since June 2023 was done initially with reference to the approved project principles and was at a relatively high level. The second stage screening in September was undertaken by way of a more detailed matrix of key criteria, discussed in advance with the Regulatory Panel, covering in addition considerations of strategic planning and national/regional marine policy (including the Solent Shoreline Management Plan, South Inshore Marine Plan and NPPF) and environmental and socio-economic matters.

Alternative solution to land reclamation or loss of terrestrial SPA habitat

8.70 Some loss of SPA/Ramsar habitat is inevitable under PLP3, as a result of dredging to enable a deep water channel to the Marine Employment Hub. Loss of intertidal habitat to the bridge piers is also likely, as already discussed. The project-level HRA will consider in more detail possible technical alternative solutions to this area of identified reclamation, such as through suspended designs, for example.

8.71 The extent to which further habitat is lost via land reclamation and/or development on the terrestrial SPA at the southern extent of Tipner West is a matter for determination at the planning application stage. PLP3 will require the applicant to demonstrate that, at the project-level, there are no feasible alternatives to the loss of terrestrial SPA, as well as demonstrate that there are IROPI and that compensation has been secured.

8.72 The RSPB and Hampshire & Isle of Wight Wildlife Trust (HIWWT) jointly commissioned and submitted to Portsmouth Council a development concept for the site which avoided any development on, or reclamation of, any part of the SPA/Ramsar designated sites, including land south of the firing range, although it did still assume a bridge. This was supported by specially commissioned concept images as part of their 'Don't Cross the Line' campaign¹²¹. This indicated support in principle for new residential and commercial development at the allocated site, but expressly excluded any development of (or reclamation from) the SPA/Ramsar designated sites, including the terrestrial SPA/Ramsar south of the former firing range.

8.73 The specific option advanced by RSPB/HIWWT was considered by the project promoter alongside all other development options in 2023 (put forward as Option 1) but was not taken forward in the optioneering process because it would substantially increase the financial viability gap. The financial modelling undertaken by the project promoters indicates that this option would result in a negative viability position in the order of £118m (driven by additional serviced development platform construction costs on Horsea Island East) but

¹¹⁹ see Appendix B at: <https://democracy.portsmouth.gov.uk/documents/s50877/240223%20-%20Tipner%20Cab%20update%20FINAL.pdf>

¹²⁰ <https://democracy.portsmouth.gov.uk/documents/s48227/Report%20-%20TRP%20Principles.pdf>

¹²¹ <https://www.hiwwt.org.uk/tipner>

in the absence of any reclamation adjacent to the marine hub (stated by the promoter team to be essential for operational functionality) it was discounted.

- 8.74 On account of the current emerging evidence on viability and feasibility, the PLP3 Policy does not rule out development on parts of the SPA/Ramsar site. However, it provides a strong policy steer that, save for the inevitable dredging required to provide access to the marine hub, loss of, or harm to, habitats sites should be avoided. Any planning application seeking consent to develop in a manner that did cause the loss of or harm to designated sites would need to provide up-to-date evidence on viability and feasibility to demonstrate that such harm was necessary to enable the development, and it would also need to provide a project-level HRA demonstrating how the proposal met the derogations tests. direct habitat loss. Any additional habitat loss will

Summary on Alternative Solutions

- 8.75 On the basis of the above provisional assessment of alternative solutions, the authors are satisfied that there are no feasible alternative solutions to the Plan's proposals for Tipner West and Horsea Island East as set out in Policy PLP3 that would be less damaging or avoid damage to the designated sites. There is currently no prospect of external funding or Council core-funding for the delivery of necessary flood defences and decontamination work. There are no better sites across the Solent to deliver the much needed marine hub. And the delivery of housing as enabling development remains the optimal land use for the purposes of securing cross-subsidy funding, to supplement the City Deal grant and to bring forward the marine hub.

Imperative Reasons of Overriding Public Interest (IROPI)

- 8.76 Portsmouth City Council as local planning authority considers there to be IROPI in support of the proposed site allocation at Tipner West & Horsea Island East. In April 2023, the local planning authority, in adopting a precautionary approach, sought an 'IROPI Opinion' from the Secretary of State (Department of Levelling up, Homes and Communities (DLUHC)) pursuant to Regulation 107(3) of the Regulations; the first request made under this provision to the UK Government since Brexit. The Council submitted a detailed Statement of Case¹²² in support of its request.
- 8.77 A response from DLUHC was received on 22nd September 2023¹²³ which, in summary, advised that the Government considered the submission to be premature, and that it would not be able to provide such an Opinion in the absence of full details of alternative solutions and compensation strategy (steps 1 and 3 of the Derogation). However, the letter from DLUHC did provide the following statement: "In an attempt to assist with further consideration of the proposal, we have however sought to provide a clarification of what could be relevant IROPI factors. In principle, we consider that the provision of housing (and affordable housing) is capable of justifying IROPI. We also consider that, at the stage where it is appropriate to give an opinion, the consideration of whether IROPI exists would need to be made against the full package of public benefits associated with the scheme – your request refers additionally to matters including flood risk, contaminant leachates and employment for example." [emphasis added]
- 8.78 There are three core reasons to IROPI in this case which are considered to give rise to a cumulative IROPI case, as outlined in the Council's Statement of Case. It should be noted that the IROPI case for the purpose of the draft Plan may have some differences or exclusions relative to those that are put forward at the more detailed project-level. This is reflected in the fact that an IROPI Opinion at the Plan-making level (Regulation 107) is separate from that which may be sought at the Project-level (Regulation 64).

Flooding Risk to Human Health and Safety

Imperative reasons: Human health, public safety, beneficial consequences of primary importance to the environment, social and economic

- 8.79 Although the requirement for flood defences stems from coastal policy independent of the Local Plan, it is relevant to IROPI because there is currently no clear source of funding for the delivery of defences at Tipner West and Horsea Island East in the absence of Policy PLP3. Portsmouth's sea-levels are due to rise by around 70cm over the next 70 years. This is noted in the Solent Shoreline Management Plan referenced in

¹²² <https://www.portsmouthcc.gov.uk/newlocalplanevidence>

¹²³ <https://www.portsmouthcc.gov.uk/newlocalplanevidence>

the Alternative Solutions section above. The existing coastal defences at Tipner West are in poor condition. The 2011 Portsea Island Coastal Strategy Study¹²⁴ estimated that defences on Horsea Island East may fail within 5-10 years, and within 10-15 years on Tipner West. Due to a lack of maintenance over recent years, there is an increasingly high risk that these defences could fail in the near future.

- 8.80 As there are currently no homes on the Tipner West site it is unlikely that flood defences would be funded by the Environment Agency and must therefore be funded by Portsmouth City Council as the principal landowner and Lead Local Flood Authority. However, there are significant funding constraints upon PCC, as noted in 8.22 above. The City Council did secure City Deal funding in 2014 to support the delivery of this critical enabling infrastructure at Tipner. However, the City Deal funding is bound up with the delivery of Policy PLP3. The do-nothing option will mean the loss of the existing land mass to flooding. This will result in the loss of the existing land uses on the site, including the Harbour School¹²⁵, five Grade 2 Listed heritage assets as well as the loss of the inter-tidal and terrestrial habitats that form part of the designated nature conservation sites. It is anticipated that intertidal habitats are likely to see a 40% reduction by 2120 through flooding.
- 8.81 In addition, flood modelling undertaken by the TRP consultants, WSP, shows that flood waters would pass through to Tipner East and Stamshaw, as shown in the image below. The image shows the estimated extent of flooding by 2123 – accounting for 100 years climate change and assuming that nothing is done to protect Tipner West.

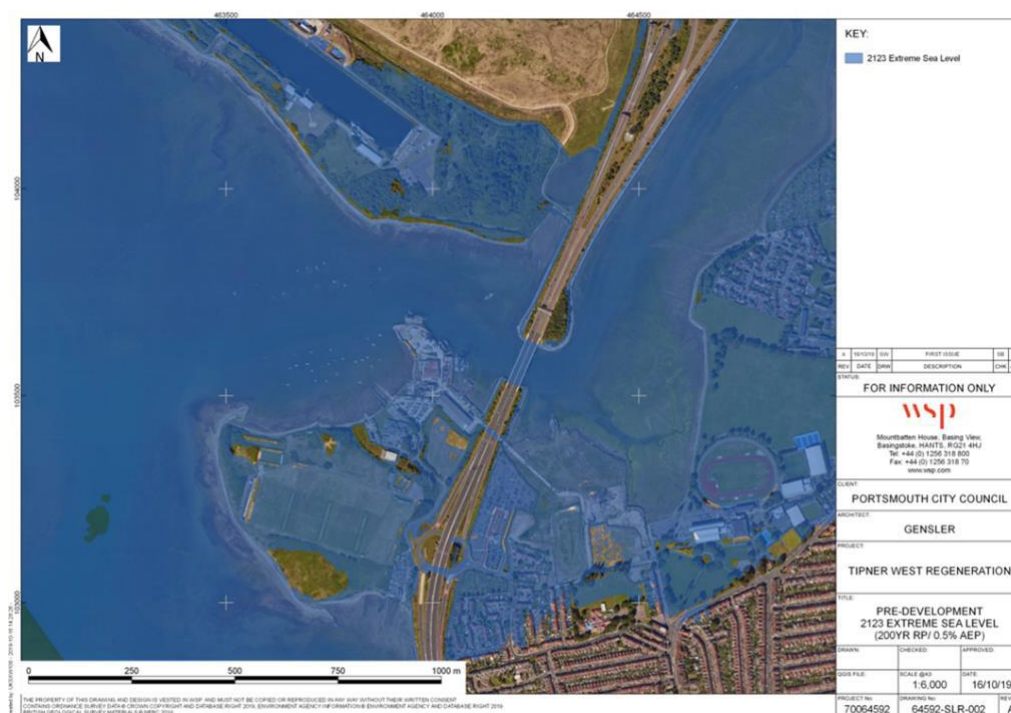


Figure 11: Flood Modelling - 2123 Extreme Sea Level (0.5% Annual Exceedance Probability) – Pre-Development Scenario¹²⁶

- 8.82 As noted in the Alternative Solutions section, the North Solent Shoreline Management Plan¹²⁷ and associated policy map for Portsmouth Harbour sets out an adopted policy of Hold the Line over the long term (to 2105).
- 8.83 The policy of 'Hold the Line' requires that defences and beach management activities are maintained or improved to provide protection from coastal flood and erosion to important assets or features at the coast. Such assets might include centres of development and redevelopment, industry and commerce, agriculture,

¹²⁴ <https://coastalpartners.org.uk/project/portsea-island-coastal-strategy>

¹²⁵ The Harbour School is a maintained Special School and Alternative Provision providing education for Portsmouth pupils who are unable to attend mainstream school for either Social, Emotional and Mental Health (SEMH) Needs or medical reasons

¹²⁶ <https://democracy.portsmouth.gov.uk/documents/s41718/APP%20C%20-%20211126-%20TRP%20-%20Full%20Council-%20Report%20Dec%202021.pdf>

¹²⁷ <https://www.northsolentsmp.co.uk/>
https://www.northsolentsmp.co.uk/media/1700/Policy-statement-and-map-5API01/pdf/Policy_statement_and_map_5API01.pdf?m=637518491614430000

nature conservation designated sites, etc. The method of maintaining or improving the line of defence may consider local adjustments to the alignment of defences or that existing structures are replaced or new defences constructed, depending on the local conditions and requirements identified. The SMP notes that: "Due to the high proportion of the North Solent shoreline that is privately owned and the maintenance of defences that are privately funded, there are frontages where a HTL has been proposed but the works identified to manage the coastal flood risk are considered economically marginal or not economically viable."

- 8.84 Whilst recognising that the SMP is non-statutory, it has been adopted through a partnership of 16 organisations, including input from Portsmouth City Council through the Havant, Portsmouth and Gosport Coastal Defence Partnership ("Coastal Partners"). However, the cost of defending the existing land mass is currently estimated to be in the order of £35m. The provision of City Deal Funding in 2014 was therefore in recognition of the necessity for environmental benefit and public safety of these flood defence works and the multiplicity of environmental, economic, social and human health risks should flood defences remain absent whilst in addition de-risking the site for private investment to secure the Council's (and Solent region's) wider employment, housing and infrastructure needs (detailed further below).
- 8.85 As addressed above in the alternatives section, there is no current prospect that the flood defences envisaged in the City Deal and the SMP will be delivered without developer funding through Policy PLP3.
- 8.86 It is concluded that the need to mitigate significant flooding risks comprise imperative reasons that are in the public interest, meeting the first two tests for IROPI in support of the draft allocation.

Contaminant Leachate Risks to the integrity of SPA/Ramsar habitats

Imperative reasons: Human health, public safety, beneficial consequences of primary importance to the environment, social and economic

- 8.87 Should the sea defences fail, there is a risk of releasing contaminants present in the ground into Portsmouth Harbour and polluting designated nature conservation sites. The site currently represents a weak-spot in island-wide defences, particularly in comparison to the recent/current North Portsea and Southsea coastal defence schemes. Contaminants on the Tipner West site stem from a long history of military use, including extensive areas of made ground, the processing of gunpowder, mustard gas degradation trials, grenade testing, stripping of military vessels (including asbestos, metal, cellulose and fluorescent paints) and discarded bullet casings. Site investigations have identified risks to controlled waters and current site occupiers, including Principal and Secondary Aquifers, notably from inorganic contaminants (metals, asbestos) and organic Polycyclic Aromatic Hydrocarbons (PAH's)¹²⁸. These recently updated assessments on behalf of the PCC Promoter team (reports in draft at time of writing this report) have noted (in the absence of mitigation measures):
- *"Unacceptable risk to ecological receptors present within the designated areas surrounding Horsea Island East and Tipner West."*
 - *The leachate exceedances represent a risk from contaminants within Made Ground leaching down to the groundwater within the Made Ground, Tidal Flat Deposits and Lewes Nodular Chalk, Seaford Chalk and Portsdown Chalk Formation and migrating laterally towards the tidal waters of Portsmouth Harbour.*
 - *Moderate concentrations of widespread inorganic (metals, asbestos) and organic (PAHs) contamination in the soils in the areas assessed on Tipner West Land associated with Made Ground deposited as part of the former military and landfilling activities on site.*
 - *Groundwater level monitoring indicates that it is tidally influenced beneath the site."*
- 8.88 There are clear contaminant leachate risks existing on site and in the absence of mitigation measures, (including sea defences, land raising/capping as part of the development of the site) the integrity of the designated sites and citation species and habitats are at risk. The proposed works would be within the

¹²⁸ Savills EIA Scoping Report for Tipner West and Horsea Island East Strategic Development Area (2020)

<https://www.portsmouthcc.gov.uk/newlocalplanevidence>;

<https://www.portsmouthcc.gov.uk/newlocalplanevidence>;

DRAFT WSP Technical Notes: "Tipner West Outline Remediation Approach" (Feb 2024) and "John Henry Pounds Contamination Summary and Listed Buildings" (Feb 2024)

Portsmouth Harbour Water Framework Directive (WFD) waterbody and Shellfish Water protected area. The waterbody is currently of only 'moderate' ecological status and 'fails' on chemical status due to mercury and Polybrominated diphenyl ethers (PBDE). All such waterbodies are required to be 'good status' and the unmitigated flooding of the Tipner landmass and associated risks of contaminant leachate would have a further negative impact upon the Harbour waterbody status and have direct and indirect impacts upon cited flora and fauna species within the designated sites. The project-level HRA and EIA will need to assess these impacts in more detail, alongside bespoke mitigation measures.

- 8.89 The North Solent SMP adopted the 'Hold the Line' policy for the Tipner flood cell with regard to contamination risks in addition to harm posed from flooding. All flood cells where holding the existing defence line is sought includes areas of contaminated land and/or landfill. It has therefore been agreed through Coastal Partners and endorsement of the SMP by DEFRA that the area should be sealed to prevent contamination of the Harbour.
- 8.90 As outlined in the Portsea Island Coastal Strategy Study, Portsmouth City Council has undertaken detailed desk studies and site investigations at several sites around the coastline with reports detailing the nature and depth of the fill, soil and groundwater contamination levels. The site investigation reports have been reviewed to determine their potential for contamination and the implication of contamination migration into the SPA and SAC. There may of course be conflicts between the damage to the international site caused through pollution and the encroachment on the SPA/Ramsar if defences have to be constructed to protect the area. The study showed that defence failure would lead to release of contamination that would be likely to adversely affect water quality and the ecological integrity of the harbours. Contaminants in sediment would be ingested by invertebrates and in turn by birds, in which concentrations may be sufficient to cause mortality or morbidity. This would be damaging to the integrity of the designated sites.
- 8.91 As set out above, there is a requirement for relevant authorities in England and Wales to take steps to protect SPAs from pollution. Policy PLP3 constitutes part of the Council's strategy for contributing to meeting that requirement. It is concluded that this amounts to an imperative reason that is in the public interest, meeting the first two tests for IROPI in support of the draft allocation.

The creation of a Marine Employment Hub for the Solent Region

Imperative reasons: Social and economic

- 8.92 The necessity to provide employment land and jobs in Portsmouth and the need, and importance of, growth of the marine, maritime and advance manufacturing sectors in the UK and Solent Region are key drivers underpinning the reasons for the proposed site allocation for Tipner.
- 8.93 The Portsmouth Economic Development and Regeneration Strategy, adopted in 2019¹²⁹ defines the need for additional jobs in Portsmouth and highlights the opportunity for a marine and maritime engineering quarter (or 'marine hub') to build on the current buoyant cluster in the City and contribute to the key objectives of addressing local low educational attainment and local talent-progression. The emerging Local Plan and its associated evidence base brings forward this objective of providing an additional 7,000 jobs and the associated need for 177,700 sqm of employment floorspace in the land-constrained City of Portsmouth. The need to provide for this growth is highlighted within the opportunities at Tipner to support marine employment.
- 8.94 The discussion below sets out the value of the marine sector to the UK economy, the current and future needs of the sector and why there is an urgent need for the UK to service its demand. The evidence below explains why the Solent is the optimal location within the UK to achieve this urgent need, and that Tipner is the best site within the Solent to deliver the marine sector requirements. The development of a marine hub at Tipner would also be in line with the first of the Government's levelling up missions namely pay, employability and productivity whilst providing high-quality skills training in the marine sector in line with the sixth levelling up mission.

¹²⁹ <https://www.portsmouth.gov.uk/services/council-and-democracy/policies-and-strategies/economic-development-and-regeneration-strategy/>

- 8.95 The delivery of development to meet the national UK marine sector is considered to be both imperative and critical and in the public interest. Should the market demand of the UK marine sector not be met:
- The growth potential of the maritime sector would not be realised;
 - Activity would either not occur or be displaced to less suitable locations, further minimising the economic potential of the sector and impact on Portsmouth, the Solent region and the UK;
 - Part of the displacement might see the potential for inward investment being diverted away from the UK.
- 8.96 The continued growth of the marine economy in the Solent area is a matter of regional strategic importance. Research carried out by the Council's project promoter team has concluded that the marine and maritime industry makes a substantial contribution to the UK's economy comprising:
- A direct contribution of £14.5 billion in GVA and 186,000 jobs (in 2015). The marine sector represented £6.4 billion of this GVA;
 - A significant supply chain that indirectly contributes approximately £37.4 billion on VA and 957,000 jobs (in 2015).
- 8.97 Key trends influencing the future of the marine and maritime industries include:
- The growing middle class in emerging economies will underpin demand for marine leisure exports.
 - Climate change and the growing need for renewable energy will result in an increased demand for offshore wind and tidal energy.
 - The UK's strength in both Research and Development, and technical expertise, make it well placed to meet the demands of this market and contribute to its growth.
- 8.98 In order to successfully service global markets and leverage the UK's historic strength in these sectors, there is a need for more well located marine land and sites to be provided to deliver the required additional capacity.
- 8.99 The UK offers a number of key clusters of marine and maritime industry that have the potential to service the market demands. Seven clusters have been identified by the Department for Transport in their 2019 report '*Maritime 2050 – navigating the future*'¹³⁰, each with their own specialisms and characteristics. The Maritime 2050 report identified the Solent as having specialisms relating to its Marine and Maritime University and Research and Development Assets, as well as having key institutions such as the Maritime and Coastguard Agency (MCA) and Lloyd's Register.
- 8.100 The *Maritime Growth Study (2015)*¹³¹ states that the maritime industry "*continues to be seen by the international market as a world leading maritime centre*" that remains "*highly competitive*" in providing training, skills and manufacturing. Whilst the "*contribution to the economy is already substantial, with the right conditions, [it] can be grown further*". Innovations, clustering and stability were identified as "*underpinning the health of the UK maritime sector*".
- 8.101 The *Maritime 2050* report sets out the Government's strategy for the maritime sector over the next 30 years and was produced following the *2015 Maritime Growth Study* to create a national strategy for the maritime sector "*which could send a strong signal to international customers and competitors.*" The report identifies strategic ambitions for the UK to build upon the existing international reputation and clusters, which include:
- To strengthen the UK reputation for maritime innovation, maximising benefits to the UK from new maritime technology through our world leading universities, maritime small and medium enterprises (SMEs) and global companies.
 - To grow the UK's maritime workforce and transform their diversity to enhance the UK's reputation as the world leader in the provision of maritime education and training.

¹³⁰ <https://www.gov.uk/government/publications/maritime-2050-navigating-the-future>

¹³¹ *The Maritime Growth Study: Keeping the UK competitive in a Global Market (2015)*

- To support the continued multi-billion pound commercial investments in maritime infrastructure that makes the UK a globally attractive destination for all maritime businesses.

8.102 In the context of the coronavirus pandemic, the maritime industry responded to the strategy with a recovery plan issued in 2020 (*Maritime Sector Recovery Plan, Maritime UK, June 2020*)¹³². The plan set out how the maritime sector is well-placed to drive a green, regionally balanced, export-led recovery and the actions needed for both industry and Government to achieve this. The short-term focus is on restarting and recovering the maritime business affected by the pandemic. The longer term goal is to renew the maritime sector in line with existing strategies and plans so as to “*deliver action to revive and transform the sector to ensure its competitiveness...*” and “*The issues on which this sector can support transformational change are many and include driving economic growth in coastal communities and through green growth*”.

Importance of the Solent

8.103 The Solent is a prime location within the UK to deliver development to meet the pressing needs of the marine and maritime sector. This is recognised in its recent designation as a Freeport. As explained above, a failure to meet the demands of the marine and maritime sector in the Solent could result in its growth potential not being attained with inward investment to the UK being compromised.

8.104 As assessment published by CEBR2 on behalf of the Solent Local Enterprise Partnership (LEP) in 2019 identified the Solent as a ‘gateway for global trade’, with the influence of its existing maritime sector and the Portsmouth Naval Base being key macroeconomic indicators of GVA, turnover and employment. The assessment notes that:

- The Solent cluster has the most diversified marine and maritime industry. Whilst most clusters excel in a few sub-sectors in the assessment, the Solent achieves the highest overall ranking;
- Whilst having a diversified marine and maritime industry, the Solent maintains a high ranking (top 3 of the 7 clusters) in terms of employment opportunities for marine leisure, MBS, naval defence, shipping and ports;
- In terms of marine and maritime businesses, the Solent ranks highest for marine leisure and ports and ranks 2nd in other sub-sectors.

8.105 A report published by MPL¹³³ undertook a market study, with engagement with the marine sector, to identify the nature and extent of marine sector requirements to be delivered by an optimal development site. The study concluded that the Solent marine sector is currently not meeting existing demand and is not realising its economic potential with the consequence being investment leaving the UK.

8.106 In order to meet the urgent needs of the marine sector, locations must provide key enabling infrastructure, with transport links being crucial to the success of an area. In addition to being the home of Southampton Port (the UK’s fifth largest port), both Southampton and Portsmouth Ports benefit from ‘Freeport’ designation, which seek to achieve the following as a key part of the government’s economic plans following its departure from the European Union:

- create jobs;
- increase international trade;
- contribute to the regional levelling up agenda; and
- serve as hubs for innovation.

8.107 The Solent also benefits from essential transport infrastructure required to deliver development to meet the needs of the marine sector. The Solent is located on one of the country’s major HGV corridors, linking the region to London via the M3, Oxford and the Midlands via the A34 and M40. The Solent also benefits from two Road Investment Strategy (RIS) projects which would significantly transform the highway infrastructure. This includes the upgrade to the M27 to a smart motorway between junction 4 (M3 interchange) and junction

¹³² <https://www.maritimeuk.org/priorities/maritime-sector-recovery-plan/>

¹³³ See Appendix B at <https://democracy.portsmouth.gov.uk/documents/b14699/Tipner%20West%20Full%20Council%20Update%20-%20Appendices%2006th-Dec-2021%2013.00%20Cabinet.pdf?T=9>

11 (Fareham), linking with the M3 smart motorway project (RIS20 and the upgrade of J3 of the M27 (RIS3). The Solent also benefits from the core rail freight network (as defined by Network Rail) on the corridor connecting Southampton port with the West Midlands. The Solent also performs well in terms of airport infrastructure, with both Southampton and Bournemouth airports located in the sub-region, and the UK's largest airport in terms of passengers and freight tonnage/value, Heathrow, is well connected within convenient travel distance.

8.108 Supported by the conclusions reached in Maritime 50, the Solent is one of seven national maritime clusters, it offers specialisms relating to its Marine and Maritime University and Research and development assets and being the location for key institutions such as the Maritime and Coastguard Agency and Lloyd's register. The Solent is uniquely placed to attract marine and maritime businesses through the application of new technology and research. The Solent cluster offers the second highest number of marine and maritime businesses in the UK (after London), with over 500 firms operating in the industry. It provides the most firms in marine leisure (136) and the second highest in marine engineering (274) and maritime business services (108).

Current Shortcomings of the Solent

8.109 The availability of waterfront sites with the characteristics to deliver the right development is key to meeting the marine sector needs. With regard to the supply of waterfront land in the Solent, in 2019 only 10% of the remaining such land offers permanent water access. Of these sites, only 57% are over 2ha in size and they offer insufficient capacity to accommodate the infrastructure and development to accommodate marine, maritime and advanced manufacturing to a scale that delivers the UK need. The Savills report for TRP, in support of the project, has conducted research into the Solent employment market to understand the strength of the marine property market, its future profile and the extent of demand and how that could be met. The key findings have concluded:

- There is a shortage of available marine-frontage built area and developable land is in high demand;
- Capital costs may impact the viability of meeting this demand in an undersupplied market;
- An optimally designed marine employment environment will require high upfront costs, but also a long term view from occupiers for this unique cluster and critical mass of activity.

8.110 The evidence base demonstrates that there is a shortage of both available marine frontage developable land, coupled with a high demand. The capital costs may impact the viability of meeting this demand in an undersupplied market. Not only will an optimally designed marine hub comprising modern waterfront infrastructure require high up-front costs, but long term financial and advisory support (potentially through partnership with the Solent LEP, among other sources) is likely to be needed to attract occupiers to establish a unique cluster and critical mass of activity.

8.111 The MPL report undertook a detailed, targeted and specific market study through engagement with the marine sector to identify the nature and extent of marine sector requirements to be delivered by an optimal development site (see Site Promotion Report, August 2021, (paras. 2.46-2.53)¹³⁴. The study concluded that the Solent marine sector is currently not meeting demand and is losing out where opportunities are leaving the UK. The study noted that other potential marine employment sites in the Solent all suffered from a number of constraints such as poor water depth, inefficient vessel launch and recovery systems.

The Potential of Tipner West/Horsea Island East

8.112 The identification of Tipner West and Horsea Island East through the City Deal is based upon the need to address the national, regional and local need for employment focused on marine employment and advance manufacturing, with public funding being provided to address the marker factors summarised above. Such funding and public sector support will enable the early delivery of the required infrastructure to enable the delivery of a 9ha of marine employment development.

8.113 The City Deal sought to maximise the impact of marine and maritime assets by unlocking critical employment and housing sites. It states that: "Providing suitable employment sites for Southampton and Portsmouth's growing marine, maritime and advanced manufacturing sectors that are in close proximity to key economic assets (Port of Southampton, Portsmouth Naval Base and the Solen Marine Cluster) as well

¹³⁴ See Appendix D at

<https://democracy.portsmouth.gov.uk/documents/b14699/Tipner%20West%20Full%20Council%20Update%20-%20Appendices%2006th-Dec-2021%2013.00%20Cabinet.pdf?T=9>

as meeting growing housing demand are key economic challenges for the Solent...Unlocking this site fully will enable the provision of 2,370 new homes and 58,000 sqm of employment space [and] will help create over 3,700 jobs."

- 8.114 For all the reasons above, the delivery of development to meet the needs of the UK marine sector is considered to be both imperative and critical and in the public interest in support of the draft allocation.

Supporting Necessary Works through Enabling Development

Imperative reasons: Economic

- 8.115 As already noted, the City Deal does not provide for full Government funding to address the critical works highlighted above and significant additional grant funding will still be required. Despite the significant economic benefits expected to accrue from the development, it is not considered reasonable by the Council Administration to expect Portsmouth residents and taxpayers to solely bear the burden of servicing a loan, over many years, to cover the funding needed, even if such finance could be arranged. With no other feasible capital raising avenues available, utilising the site to provide enabling development to support the deliverability of the objectives is therefore considered essential. Further discussion on the financial constraints is provided in site promoter's report to Cabinet and Full Council in December 2023.¹³⁵
- 8.116 The provision of enabling development, in the form of residential development, is considered by the LPA to be both imperative and in the public interest to ensure the delivery of the site allocation and its many associated benefits. The response from DLUHC of September 2023 confirmed that the provision of housing could constitute IROPI.

Other Public Benefits

Imperative reasons: Human health, public safety, beneficial consequences of primary importance to the environment, social and economic

- 8.117 The LPA's IROPI statement of case outlined other public benefits, notably:

Housing Need

- 8.118 The Tipner West & Horsea Island East allocation will deliver between 814 and 1250 homes in total. The need for new homes in Portsmouth is great. Based on the standard methodology, as of December 2023, the need for new homes in the City is 899 dwellings per year. Policy PLP16 of the Pre-Submission Local Plan sets a housing target of 13,603 new homes to be completed in the City up to 2040, which is 680 new homes each year. There is therefore an annual unmet need of 219 homes per year. The Housing Delivery Test Action Plan¹³⁶ explains the reasons for under delivery and sets out ways in which we will address it.

Sustainable Transport and Connectivity

- 8.119 A city-wide policy in line with the Portsmouth Transport Strategy (LTP4) and Imagine Portsmouth 2040 Vision¹³⁷, including meeting climate change targets as outlined in draft Chapter 9 of the Local Plan ("Greening the City").

Public Access to Open Space and Heritage Assets

- 8.120 With the benefit of City Deal funding and the adoption of the new Portsmouth Local Plan 2040, it is feasible to open up much improved opportunities for public access to areas of public open space planned on former landfill to the north of the HIE site. The land is allocated for new open space under draft policy PLP9 of the Pre-Submission Local Plan. This would cover an area of approximately 64ha and provide public health benefits for existing and new residential communities.
- 8.121 In addition, there are five Grade 2 Listed Buildings on the site which have been neglected for many years. The enabling of development of the Tipner West peninsula as supported through the City Deal and draft Local Plan allocation, alongside the imminent freehold acquisition of these assets by the City Council, provides the City Council with new opportunities and responsibilities. The listed buildings on site have a

¹³⁵ <https://democracy.portsmouth.gov.uk/documents/s49338/TRP%20Report.pdf>

¹³⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/11/Portsmouth-City-Council-Housing-Delivery-Test-Action-Plan-2022-2023.pdf>

¹³⁷ <https://imagineportsmouth.co.uk/the-vision/>

unique maritime history, in particular with regard to the holding of gunpowder and munitions and the site allocation seeks to ensure, as far as possible, the restoration, repair and re-purposing of these assets.

Managing existing recreational disturbance to birds on designated areas

8.122 The site is currently inflicted with unmanaged access to the coastal edge resulting in recreational disturbance of qualifying bird species on the intertidal, estuarine and terrestrial areas of the SPA/Ramsar site. Creating a deliverable development on the site will enable an on-site management plan and mitigation/avoidance strategy to be introduced to prevent and reduce direct recreational disturbance and other adverse effects to the site integrity that are arising from current uses, both formal and informal, of the land in its current status. This would be in addition to the established Bird Aware mitigation strategies already in place.

The Overriding Balance

8.123 Consideration of IROPI necessarily involves a balancing exercise for the decision-maker. It is necessary for the 'competent authority' namely Portsmouth City Council as LPA, to consider if the imperative reasons and public benefits put forward override the anticipated harms identified. Advocate General Kokott in Case C-239/04 described the exercise as a balancing exercise: *"The necessity of striking a balance results in particular from the concept of 'override', but also from the word 'imperative'. Reasons of public interest can imperatively override the protection of a site only when greater importance attaches to them. This too has its equivalent in the test of proportionality, since under that principle the disadvantages caused must not be disproportionate to the aims pursued."*¹³⁸

8.124 The overriding balance is thus a matter of judgement to be conducted by weighing the imperative reasons of public interest against the identified adverse effects on the Portsmouth Harbour SPA / Ramsar site.

8.125 On one side of the balance is the reasonable worst-case direct loss of habitat resulting from the adoption of Policy PLP3: 2.1ha of intertidal habitat from dredging for the marine hub; 0.3ha of intertidal habitat for the bridge piers; up to 0.5ha of subtidal habitat from land reclamation for the marine hub; and up to 3.6ha of terrestrial habitat from development on land south of the firing range. According to the Ramsar Information Sheet for the Portsmouth Harbour Ramsar site¹³⁹, 59.3% of the site consists of intertidal flats and 21.2% consists of coastal waters (which will largely have subtidal mudflat as a substrate). This equates to approximately 740.52ha of intertidal flats and approximately 264.74ha of subtidal habitat. The reasonable worst-case habitat loss due to Policy PLP3 therefore equates to 0.3% and 0.19% of these features respectively. While any permanent loss above the trivial requires compensatory provision, this scale of loss is a very small amount of the total available resource.

8.126 As for the possible loss of terrestrial habitat, this resource is scarcer within the Portsmouth Harbour SPA/Ramsar boundary with the land to the south of the firing range on Tipner West being the largest area of terrestrial habitat within the SPA/Ramsar boundary. However, this only represents a small amount (c. 3ha) of the terrestrial primary support habitat around the SPA/Ramsar, with the majority of high tide roosting habitat which support SPA birds already lying beyond the SPA/Ramsar boundary, as identified in the Solent Wader and Brent Goose Strategy. For example Primary Support Areas P48C (46.45ha), P40 (10.25ha), P43 (6.8ha), P140 (4.53ha) and P40A (2.6ha) all lie within 1.5km of the land south of the firing range. There is an agreed strategy for offsetting of the loss of primary support areas outside the SPA as set out in section 6.2 of this report, indicating that it is possible to replace such habitat. Moreover, even if development of land to the south of the firing range on Tipner West does occur it will not result in the loss of the entirety of this habitat and such development is not a requirement or inevitable outcome of Policy PLP3. Therefore, while any permanent loss above the trivial requires compensatory provision, the potential scale of loss is a small amount of the total available resource, being approximately 5% of the primary support area resource within c. 1.5km of the development.

8.127 On the other side of the balance are long term, significant benefits in the public interest, as set out above. Some of those benefits (sea defence and decontamination) directly contribute to protecting the long-term integrity of the Habitats sites. While it is not possible to quantify the impact of long-term leachate contamination on the integrity of the SPA/Ramsar site, the risk of such contamination is real and present,

¹³⁸

<https://curia.europa.eu/juris/document/document.jsf?text=&docid=56397&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=11738122>

¹³⁹ <https://jncc.gov.uk/jncc-assets/RIS/UK11055.pdf>

and it is reasonable to assume it would have adverse effects at least as harmful as the reasonable worst-case direct habitat loss that might be caused by the PLP3 allocation.

- 8.128 How the balance is struck is ultimately a matter of judgement. The authors collective professional judgement is that the afore-mentioned imperative public interest benefits clearly OVERRIDE the risk or certainty of adverse effects on the integrity of the Portsmouth Harbour SPA and Ramsar Site arising from the site's allocation for development as set out in draft policy PLP3. That said, as Council Members are the elected representatives of the competent authority, their views of the public interest carry particular weight and they will ultimately need to endorse or reject this judgement, having regard to the expert evidence in this HRA.

Compensatory Measures

- 8.129 To ensure deep water access to the new marine hub quaysides dredging of approximately 2.1ha of intertidal habitat within Portsmouth Harbour SPA/Ramsar site will be required, converting it to subtidal habitat. This will reduce the overall net extent of intertidal habitat available for bird roosting and foraging within the SPA/Ramsar. Other aspects of development delivery are likely, though not certain, to involve land-take from the SPA/Ramsar site depending on how the development is designed for the planning application. Placement of bridge piers in the intertidal zone are likely to be needed and would involve the loss of up to 0.3ha of intertidal habitat within the SPA/Ramsar. Up to 0.5ha of subtidal habitat could potentially be lost if possible areas of reclamation identified in the Local Plan are realised. For purposes of realistic worst-case assessment, this HRA has also identified the potential for loss of up to 3.6ha of terrestrial habitat in south of the firing range on Tipner West. This totals 2.1ha of inevitable intertidal habitat loss, 0.5ha of likely subtidal and 0.3ha of likely intertidal habitat loss (for the bridge piers), and 3.6ha of possible terrestrial habitat loss.

- 8.130 The progression of an appropriate compensation strategy for the site allocation has been on-going since the City Deal grant was awarded and project team put in place. This initially progressed to detailed landowner negotiations across a Solent-wide search area and for the purposes of compensating the previous 'super peninsula' proposals for the site.

- 8.131 The compensation strategy was informed, in part, by the development of a bespoke 'SPA Metric', originally developed by promoter consultants Environment Bank, based upon DEFRA biodiversity metric principles, and to provide a quantitative assessment of SPA/Ramsar impacts and appropriate levels of compensation. Unlike the Defra biodiversity metric, the SPA metric does not account for habitat distinctiveness, but takes into account the relative functionality of the habitat before and after development for the qualifying Annex 1 bird species concerned. The project promoters are continuing to refine the bespoke SPA metric in consultation with the Regulatory Panel.

- 8.132 In summary, the bespoke SPA metric takes account of the following parameters:

- SPA/Ramsar function, based on bird survey data and other available information, as previously characterised by Environment Bank;
 - Habitat condition, based on SSSI condition assessment information, expert judgement and precautionary assumptions;
 - Time taken to reach target habitat function and condition; and
 - Difficulty in creating target habitat function and condition.
- In calculating compensation requirements the following assumptions have been made, as informed through consultation to date with the Regulatory Panel:
- The baseline condition of SPA habitats is assumed to be 'Good', on the basis of the duty to restore to favourable condition;
 - The function of the terrestrial SPA land to the south of the firing range is assumed to be 'High', again, on the basis of the duty to restore habitats to favourable condition;
 - Through appropriate mitigation of urban effects there will be no functional habitat loss within retained terrestrial SPA land south of the firing range;
 - Bridge/road provision for both options has the same impact parameters;

- Coastal squeeze impacts assumed identical for both options; and
 - Dredge channel impacts assumed identical for both options.
- 8.133 In addition to the parameters used within the baseline SPA metric calculation, the post-development calculation uses additional multipliers to take account of the difficulty in creating compensation habitat and the time taken to reach the required condition. The metric has been used to calculate the amount of land potentially required to secure adequate compensation for impacts to SPA habitat arising from development Options A and B set out above at Figures 5 and 6, on the basis that SPA habitat loss would need to be compensated on a like-for-like basis (e.g. terrestrial for terrestrial, intertidal for intertidal, and sub-tidal for sub-tidal), with habitat creation multipliers varying depending on the type of habitat proposed as compensation.
- 8.134 The following types of compensatory provision are required:
- Terrestrial compensation – creation of undisturbed semi-natural terrestrial grazing;
 - Intertidal compensation - conversion of agricultural land (currently unsuitable for SPA birds) to intertidal; and
 - Sub-tidal compensation – conversion of intertidal to sub-tidal through dredging.
 - Not taking account of wider professional judgement, the metric currently indicates a need for between 10ha and 14.5ha of compensatory habitat (approximately), split as follows:
 - Approximately 9ha intertidal compensatory habitat;
 - Approximately 1ha of sub-tidal compensatory habitat; and
 - Approximately a further 4.3ha of terrestrial habitat compensation if Option B is taken forward as this Option involves development on the terrestrial habitat within the SPA/Ramsar that is used by SPA/Ramsar birds.
- 8.135 In the process of identifying potential locations for compensatory provision the site promoter team has identified ten sites across the North Solent between Portsmouth Harbour and Chichester Harbour amounting to approximately 400ha. The smallest parcel is c. 5ha in area with the largest being 126ha in area. Approximately 344ha of this total is suitable for intertidal or subtidal habitat creation and approximately 62ha is suitable for terrestrial habitat creation. This sums to more than 400ha because some parcels are suitable for both/either intertidal or terrestrial habitat. Approximately 40% of this land is in public body ownership (such as Portsmouth City Council, Hampshire County Council and The Crown Estate) with the remainder in private landowner hands. Site owners have expressed willingness in broad terms to contribute land to compensation.
- 8.136 The sites identified by the site promoter team are commercially confidential. Aecom and members of the Council's LPA team have, however, been permitted to review those parcels for the purposes of this HRA and are satisfied that there is easily sufficient land that is both suitable and available to compensate any loss of protected habitat caused by the adoption of Policy PLP3 and available. The Council as LPA is working with the promoter team to explore what information about the sites can be made publicly available and how the Secretary of State, PINS and relevant statutory consultees can receive information about those sites, if necessary on a confidential basis.
- 8.137 The final approach to compensatory habitat will continue to be discussed between the PCC Promoter team and the Regulatory Panel, having regard, for instance, to any preference for high-tide roosting habitat over inter-tidal/sub-tidal options, which may favour a more local solution, such as island recharge within Portsmouth Harbour. Moreover, at the project-stage, the SPA metric will need to be accompanied by a careful assessment of the baseline evidence in relation to both the existing site and the proposed compensation site and professional ecologist assessment will be required.
- 8.138 Some members of the Regulatory Panel have criticised aspects of the metric approach used by the promoter to calculate the compensation requirement. However, due to the area of available land identified a considerable margin for error is built into the proposals at this stage (c. 400ha of land identified as suitable compared to 14.5ha of compensation currently calculated to be required). As such, amendments to the

calculations at the project-stage, or in an HRA to accompany a planning application, are unlikely to change compensation requirements to such an extent that suitable and available land is inadequate.

- 8.139 At the strategic planning stage, AECOM considers that there can be high confidence that across these parcels sufficient areas can be secured to deliver the necessary compensatory habitat once the quantum and nature of the required compensatory habitat is known.

Overall conclusion on the Derogations Tests

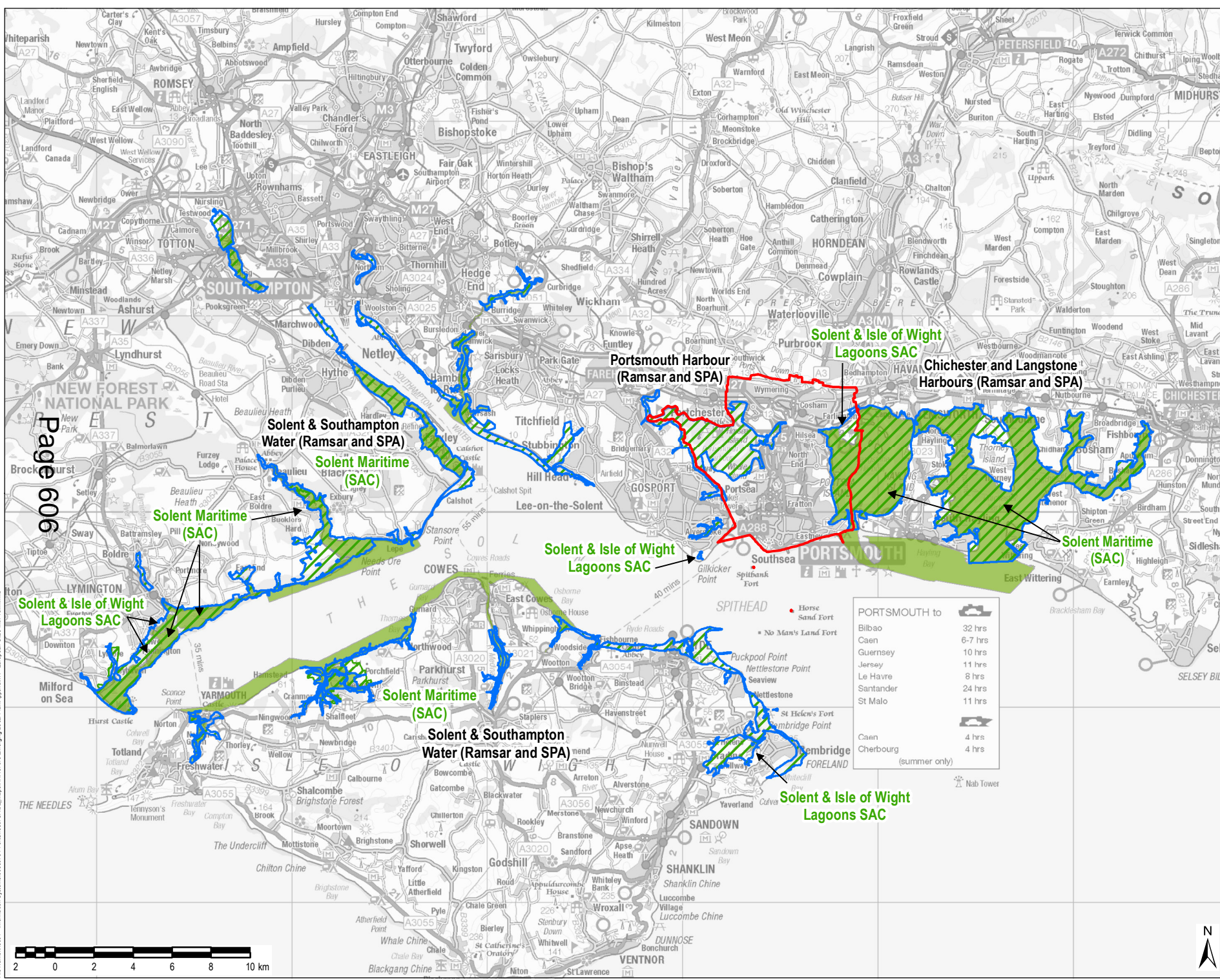
- 8.140 The overall conclusions of the preceding assessment of each part of the derogation tests, is that sufficient information exists at the Local Plan level to be able to conclude that the Tipner West and Horsea Island East (Policy PLP3) that a) there are no feasible alternatives to this allocation that would be less damaging to the integrity of the SPA/Ramsar site while still meeting the objective set out in section 8.1 of this HRA as expressed in the Local Plan, b) there are IROPI as to why the Local Plan should be adopted with Policy PLP3 intact despite the harm caused to Portsmouth Harbour SPA/Ramsar site and c) there is sufficient suitable land identified for delivery of compensatory measures to conclude that suitable compensation can be secured at the planning application level once the quantum and nature of the required compensatory habitat is known.

Appendix A Map of Habitats Sites

THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Portsmouth City boundary
- Ramsar
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)



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Purpose of Issue
DRAFT

Client
PORTSMOUTH CITY COUNCIL

Project Title
HRA OF THE EMERGING PORTSMOUTH LOCAL PLAN

Drawing Title
EUROPEAN SITES WITHIN 10KM OF PORTSMOUTH CITY

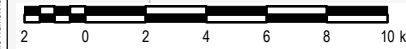
PORTSMOUTH to

| | |
|-----------|---------|
| Bilbao | 32 hrs |
| Caen | 6-7 hrs |
| Guernsey | 10 hrs |
| Jersey | 11 hrs |
| Le Havre | 8 hrs |
| Santander | 24 hrs |
| St Malo | 11 hrs |
| Caen | 4 hrs |
| Cherbourg | 4 hrs |

(summer only)

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File Name: I:\2024 - Information Systems\60586784 - Portsmouth SA02 - Marsh HRA of the Emerging Local Plan\Appendix A - European Sites within 10km.mxd



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| Drawn JW | Checked TD | Approved DW | Date 24/08/2021 |
| AECOM Internal Project No. 60586784 | | Scale @ A4 1:250,000 | |

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Drawing Number
APPENDIX A

Rev
01



Appendix B Screening for Likely Significant Effects

Table 8: Likely Significant Effects (LSEs) test for policies included in the emerging Portsmouth Local Plan.

Each policy is assessed for potential impact pathways linking to Habitats sites. If LSEs cannot be excluded and Appropriate Assessment is needed, the final column is marked in orange, otherwise the last cell is marked green.

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|---|--|
| Chapter 3 – Development Strategy | | |
| <p>Core Policy PLP1: Design</p> | <p>This policy seeks to ensure a high standard and quality of design. Proposals will be assessed on certain criteria including:</p> <ul style="list-style-type: none"> • Making a positive contribution towards achieving the Portsmouth Design Vision • Demonstration of key design and placemaking characteristics: <ul style="list-style-type: none"> – Context – Identity – Built form – Movement – Nature – Public spaces – Uses – Homes – Resources – Lifespan • Large scale development and development at sensitive locations should have positive regard to any design code or design guide relevant to the site. • Development proposals should combat crime through their design and layout • Developments should not give rise to unacceptable adverse impacts in relation to amenity of occupiers • Developments should avoid, minimize and mitigate where necessary the impact of: <ul style="list-style-type: none"> – Outlook / aspect – Sense of enclosure – Direct or perceived overlooking / privacy – Daylight / sunlight – Noise – Odour | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a design management policy that identifies important design criteria for new developments in Portsmouth City. Some of these features (building height, lighting, fenestration) clearly relate to impact pathways, such as impacts on SPA / Ramsar bird flightlines. However, no specific detail on any of these design criteria is provided in this policy.</p> <p>Therefore, there are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|--|--|
| | <ul style="list-style-type: none"> - Glare - Micro-climatic effects • Developments for tall buildings are subject to additional criteria | |
| <p>Core Policy PLP2: Climate Emergency</p> | <ol style="list-style-type: none"> 1. Development proposals will be supported provided that they: <ol style="list-style-type: none"> a) Reduce greenhouse gas emissions and store carbon; b) Minimise energy use and demonstrate that residual energy demand can be met with renewable forms of energy; c) Maximise the generation of energy from renewable and low carbon sources of energy; d) Are designed to adapt and be resilient to the impacts of local climate change; e) Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; f) Maximise water re-use and the protection of water resources; g) Prioritise active travel and effective public transport over car use wherever possible; h) Deliver green infrastructure and enhance biodiversity; i) Prevent and minimise waste and encourage re-use, recycling, and resource recovery; and j) Encourage the reuse of existing buildings and structures. 2. Development proposals for major development must be supported by a Sustainability Statement, which clearly demonstrates how it meets the objectives set out in Part 1 of this policy | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a design management policy that supports environmentally friendly development.</p> <p>There are no specific allocations made in this policy. Therefore, there are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Chapter 4 – Strategic Sites</p> | | |
| <p>Strategic Site Allocation Policy PLP3: Tipner West & Horsea Island East</p> | <p>Policy allocates land at Tipner West & Horsea Island East, for mixed use development including:</p> <ul style="list-style-type: none"> • 58,000m² marine employment floor space • 814 to 1,250 residential dwellings • A bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only; • Flood defences along the peninsula edges; • Shops selling essential goods, including food, where the shop's premises do not exceed 280m²; and • Meeting places for the principal use of the local community (class F2b). <p>Development proposals for these uses will be permitted provided that they meet additional criteria including:</p> <ul style="list-style-type: none"> • Create a landmark gateway to the City of Portsmouth with a site-wide master plan and design code • Designing of buildings and spaces to break down the barrier (physical and perceived) created by the M275 and Portsbridge Creek. • Allowing views from Tipner West and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base • Integrating green and blue infrastructure into the masterplanning and design of the development; • Identifying and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks; | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Tipner West and Horsea Island East, which allocates the 814 to 1,250 dwellings and 58,000m² of marine employment space</p> <p>The following impact pathways are associated with an increase in population size, employment area and tourism opportunities:</p> <ul style="list-style-type: none"> • Recreational pressure (in Habitats sites and functionally linked habitat) • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|----------------------|---|---|
| | <ul style="list-style-type: none"> • Except for the minimum dredging necessary to establish and maintain deep water access to the marine hub, avoid the loss of, or damage to, SPA/Ramsar habitats. If that is not viable or feasible, minimise such loss, or damage, to that required to enable the viable and feasible development of the site in line with the development quantum set out in this Policy whilst protecting the integrity of the international, national and local nature designations; • Incorporating car-free streets where feasible; • Improving off-road pedestrian and cycle provision linking Port Solent and Tipner to the City Centre and nearby public open spaces; • Providing safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network; • Deliver or contribute proportionally to relevant transport and highways mitigation measures, identified in the STP and/or IDP; • Mitigating likely significant effects from recreational disturbance; • Providing for public access along the waterfront where feasible; • Delivering appropriate surface water and foul drainage infrastructure together with required nutrient neutrality and water usage mitigation measures; • Implementing land raising and construction of flood defences informed by the SFRA Level 1 and 2 • Deliver surface water management measures for high tide events • Mitigating and remediate contamination from current and historic uses; • Providing a skills and employability plan; <p>The Listed Buildings and Scheduled Monument must be retained, restored and re-used as appropriate.</p> <p>A segregated bus way between Tipner West and Horsea Island via a new bridge and on to Port Solent will be established and operated.</p> <p>The deep water access to Tipner Point and the new marine hub quaysides will be maintained.</p> <p>A shadow, project level Habitat Regulations Assessment (HRA) will be required to be submitted along with the planning application, and as necessary for any phased applications, to the local planning authority as competent authority. On account of the fact that delivery of the Policy will inevitably result in the loss of some designated SPA/Ramsar habitat and will likely result in the loss of some functionally linked habitat, the HRA must among other things:</p> <ol style="list-style-type: none"> provide sufficient evidence for the local planning authority to conclude, in consultation with Natural England and Secretary of State, that all three derogation tests have been passed. demonstrate that any loss of functionally linked habitat, including that identified as a primary or secondary support area in the Solent Waders and Brent Goose Strategy , will be mitigated through the provision of replacement functionally linked supporting habitat of equal or greater quality and quantity, which fulfils the same special contribution and particular function of the areas lost or damaged for the same species of birds. Planning applications may come forward separately or in phases. All proposals need to demonstrate consistency with other permissions granted and emerging proposals. Planning applications will need to demonstrate potential solutions if future phases do not come forward within an agreed timeframe. | <ul style="list-style-type: none"> • Atmospheric pollution • Impacts on flightlines • Coastal squeeze • Permanent habitat loss <p>Due to these linking impact pathways, this policy is screened in for Appropriate Assessment.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|---|---|
| <p>Policy PLP4: Tipner East</p> | <p>Policy allocates land at Tipner East, for mixed use development including:</p> <ul style="list-style-type: none"> • 1,056 residential dwellings • A new transport hub with 840 m² ancillary commercial uses • Commercial and community uses including a convenience store, a restaurant/café and a community space. • Flood defences in line with robust climate change scenarios <p>Development proposals for these uses will be permitted provided that they meet additional criteria including:</p> <ul style="list-style-type: none"> • Create a new landmark gateway to the City of Portsmouth ; • Designing of buildings and spaces to break down the barrier (physical and perceived) created by the M275 and Portsbridge Creek. • Integrating green and blue infrastructure into the masterplanning and design of the development; • Incorporating car-free streets where feasible; • Improve off-road accessible pedestrian and cycle provision linking with the city centre and local open space and local facilities; • Providing safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network; • Deliver or contribute proportionate transport and highways mitigation measures identified in the STP and IDP; • Providing for public access along the waterfront where feasible and mitigating likely significant effects from recreational disturbance; • Safeguard the routes of the Pilgrims Trail, the King Charles III England Coast Path and National Cycle Route 22 through the site • Providing appropriate compensation and mitigation measures to the satisfaction of the local planning authority and Natural England in regard to the Secondary Support Sites P136 and P139 of the Solent Waders and Brent Goose Strategy; • A shadow, project level Habitat Regulations Assessment (HRA) will be required to be submitted along with the planning application(s) to the Local Planning Authority as competent authority. This must provide sufficient evidence for the Local Planning Authority to undertake an Appropriate Assessment, in consultation with Natural England, and to be satisfied that the mitigation measures proposed by the applicants would result in no significant effects upon the integrity of the National Site Network, whether alone or in combination with other plans and/or projects in the area; Delivering surface water management measures to make provision for storage during high tide events. • Implementing land raising and construction of flood defences informed by the SFRA Level 1 and 2 • Mitigating and remediating for contamination from current and historic uses; and • Planning applications may come forward separately or in phases. All proposals need to demonstrate consistency with other permissions granted and emerging proposals. Planning applications will need to demonstrate potential solutions if future phases do not come forward within an agreed timeframe | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Tipner East, which allocates the 1,056 dwellings and a new transport hub.</p> <p>The following impact pathways are associated with an increase in population size, employment area and tourism opportunities:</p> <ul style="list-style-type: none"> • Recreational pressure (in Habitats sites and functionally linked habitat) • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution • Impacts on flightlines • Coastal squeeze • Permanent habitat loss <p>Due to these linking impact pathways, this policy is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP5: Lakeside North Harbour</p> | <p>Lakeside North Harbour is allocated as an employment-led location to provide at least 50,000sqm of office uses. Alternative commercial uses may be permitted, if it can be demonstrated that there is insufficient market demand for offices at this location.</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|--|--|
| | <p>A new secondary access point at Lakeside to be provided on to the Western Road (A27) in accordance with the general arrangement plan (figure XX) of the Strategic Transport Assessment, or such alternative as may be developed and agreed with PCC Highways.</p> <p>Development proposals will be permitted provided that they meet all of the development requirements, including:</p> <ul style="list-style-type: none"> • A masterplan and design code for the whole site • A high standard and quality of design sympathetic to the campus style setting and ecological value; • An employment skills plan • To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked (Candidate Site P138) to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England • A biodiversity net gain of at least 20% • An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan • A site specific Flood Risk Assessment will be required • Flood management measures should be incorporated within the site in accordance with the SFRA Level 1 and 2 • Effective surface water management measures for high tide events • The provision of a Sustainable Drainage System (SuDS) to mitigate the risk of surface water flooding. • Provision made for remediation of any current and historical contamination of the site. • Effective access arrangements that are safe and suitable for all users. • A Travel Plan to minimise car use by current and prospective occupants of Lakeside and to maximise use of sustainable modes of transport, • Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Development Plan | <p>This is the strategic development policy for Lakeside North Harbour which allocates approx. 50,000m² office-led floorspace in the plan period.</p> <p>The following impact pathways are associated with an increase in employment area. Water quality</p> <ul style="list-style-type: none"> • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution • Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP5 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP6: Portsmouth City Centre</p> | <p>This policy allocates Portsmouth City Centre, for the comprehensive mixed-use development of the following uses:</p> <ul style="list-style-type: none"> • 4,158 dwellings • 20,000m² (Gross) of employment office space (net 1,546m²) • 2.9ha park at City Centre North <p>Development proposals will be permitted provided that they meet all of the development requirements, including:</p> <ul style="list-style-type: none"> • Enhancing the city centre's commercial uses and supporting culture, arts, civic and leisure uses. Including space for a regular market. • Protecting and enhancing the existing open spaces • Provision is made for a space for a regular market on Commercial Road; • Improve pedestrian and cycle connectivity to the surrounding residential areas; | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Portsmouth City Centre, which allocates new dwellings (4,158), new commercial floorspace (net 1,546m²).</p> <p>The following impact pathways are associated with an increase in population size and employment area:</p> <ul style="list-style-type: none"> • Recreational pressure (in Habitats sites and functionally linked habitat) |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|--|---|
| | <ul style="list-style-type: none"> • Incorporating car-free streets with Mobility-as-a-Service and prioritise sustainable transport modes; • Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Development Plan • Ensure the air quality in adjoining AQMAs is not worsened • Provision made for remediation of any current and historical contamination of the site. • Complement the proposals set out in the University of Portsmouth Estate Masterplan where relevant; • Demonstrate how its design enhances the centre's appearance and considers the needs and safety of all its users including reducing crime, through the provision of a design code; • Major development including major commercial development should provide an employment and skills plan to demonstrate how the proposals provide opportunity for local workers; • Major Development should provide a travel plan to demonstrate how it is contributing to a shift to sustainable and public transport in in the centre; and • Development protects trees within the City Centre and takes opportunities to plant more and provide enhanced greening. <p>This policy breaks down the city centre area is divided into areas, with differing design goals for the four areas in which proposals are supported. These areas are City Centre North, City Centre Commercial Area, Station Road Regeneration Area, Guildhall Cultural Regeneration Area.</p> | <ul style="list-style-type: none"> • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution • Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP6 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP7: Fratton Park and The Pompey Centre</p> | <p>This policy allocates Fratton Park and the Pompey Centre, for the comprehensive mixed-use development of the following uses:</p> <ul style="list-style-type: none"> • Expansion to the north stand of Fratton Park Football Stadium; • Approximately 710 residential dwellings with ground floor active uses. • Supporting hotel (Approx 145 rooms) • Mixed conference and event facilities <p>Development will:</p> <ul style="list-style-type: none"> • include an off-road pedestrian and cycle link from Fratton Train Station to Fratton Park. • Incorporate active frontages and entrances that promote activity • Planning applications may come forward separately or in phases. All proposals need to demonstrate consistency with other permissions granted and emerging proposals. Planning applications will need to demonstrate potential solutions if future phases do not come forward within an agreed timeframe <p>Develop proposals will be permitted if they meet the site specific requirements, which include:</p> <ul style="list-style-type: none"> • The design, height and density of development integrates with the existing context and character of the site • Effective, safe access arrangements • Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Development Plan • A travel plan and transport assessment provided • Sustainable Drainage System (SuDS) Provision • A network of interconnecting green and public access corridors throughout the site | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Fratton Park and the Pompey Centre, which allocates the following number of dwellings, employment areas and leisure uses:</p> <ul style="list-style-type: none"> • Expansion to Football Stadium, • 710 dwellings, • Hotel, conference and event facilities <p>The following impact pathways are associated with an increase in population size and employment area:</p> <ul style="list-style-type: none"> • Recreational pressure (in Habitats sites and functionally linked habitat) • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|--|---|--|
| | | <ul style="list-style-type: none"> Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP7 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP8: St. James' and Langstone Campus</p> | <p>This policy allocates St James's and Langstone campus for a mixed use development comprising healthcare facilities, education facilities, recreation, sports and community facilities, 417 dwellings.</p> <p>Planning permission for the St James's part of the site has the site specific requirements including:</p> <ul style="list-style-type: none"> Conserving the setting and significance of heritage assets in the hospital grounds. A heritage statement for all proposed development Conserve or enhance the district parkland landscape and open character Provide Arboricultural Impact assessment and method statement for implementation Integrating the following open spaces into new development: The St James's Hospital Cricket Pitch, The Dog Park, Land to the north west of the listed chapel, and to the east and west of Chapel Way. Providing north-south pedestrian and cycle links from Locksway Road to Longfield Road. Provides off site highway network improvements. <p>Planning permission for the Langstone Campus part of the site has the site specific requirements including:</p> <ul style="list-style-type: none"> A landscape and visual impact assessment Retention of playing fields and pitches where possible Retention and enhancement of public access Enhancement and retention of public access to open space and playing fields The north-south bus / cycleway connection along Furze Lane is retained and enhanced Safe and accessible off-road walking and cycle routes <p>All developments at the site should provide:</p> <ul style="list-style-type: none"> Mitigation for direct recreational disturbance on Nationally and Locally designated habitat sites A site specific flood risk assessment and appropriate flood management measures A sustainable drainage system A travel plan and transport assessment Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Development Plan Transport links including road improvements and pedestrian/cycle links across the site and to wider parts of the City Proposals should meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). The developer should provide evidence that the allocated site will not result in the loss of habitat that | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for the St. James' and Langstone Campus, which allocates the 417 dwellings.</p> <p>The following impact pathways are associated with an increase in population size and employment area:</p> <ul style="list-style-type: none"> Recreational pressure (in Habitats sites and functionally linked habitat) Loss of functionally linked habitat Water quality Water quantity, level and flow Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) Atmospheric pollution Impacts on flightlines Coastal squeeze <p>Due to these linking impact pathways, Policy PLP8 is screened in for Appropriate Assessment.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|--|--|
| | <p>is functionally linked (Core Area P23B, Secondary Support Area P25) to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity;</p> | |
| <p>Policy PLP9: Horsea Island Open Space</p> | <p>This Policy allocates Horsea Island Open Space for development including:</p> <ul style="list-style-type: none"> • Public open space; • Improved habitat for wildlife; • Infrastructure supporting the provision of the open space; • Infrastructure supporting the remediation of the former landfill; • Provision of a segregated busway / cycle and pedestrian link between Tipner West and Port Solent, via a new bridge at Horsea Island East. <p>Development proposals for the above-named uses will be permitted provided that they meet all of the following site-specific development requirements:</p> <ul style="list-style-type: none"> • The open space provision should consider the needs of users and provide multi- functional spaces; • The open space provides for a mosaic of habitat that links to and supports the habitat of the neighbouring Portsmouth Harbour Special Protection Area and recognises the role of the site as habitat for waders and Brent Geese; • To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars . To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.' Proposals will need to comply with and Policy PLP 42 of this plan and take account of the guidance set out in and the Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements; • Proposals will need to be in line with the restrictions of the MoD exclusion zone; • Public access will be restricted from areas needed for the safe extraction of gases from the former landfill; • Proposals will take account of the approved plan for landscaping and maintenance of the former landfill site; • Allow views to and from the open space and notable landmarks, within the zone of visibility; | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy supports the habitat of the neighbouring Portsmouth Harbour Special Protection Area.</p> <p>There are no impact pathways that link this policy to Habitats Sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Chapter 5: Site Allocations</p> | | |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
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| <p>Policy PLP10: Land West of Portsdown Technology Park</p> | <p>This policy allocates Land West of Portsdown Technology Park for the provision of 12,500m² of employment land for research and development and/or manufacturing.</p> <p>Development proposals for this must meet the site specific requirements including:</p> <ul style="list-style-type: none"> • Providing an employment and skills plan • Provide evidence for ground conditions and contamination, making provision for remediation as necessary; • Ensuring safe and suitable access arrangements; • Provide a Travel Plan to minimise car use and maximise the use of sustainable transport; • Requiring a landscape design strategy, considering views within an agreed zone of visibility and viewpoints to the north and south; • Landscaping that enhances the site's contribution to the downland setting and provides links to green infrastructure; • Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Development Plan • Restricting development to the previously developed land; • Responding positively to local heritage assets. | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Land West of Portsdown Technology Park, which allocates new employment floorspace (12,500m²).</p> <p>The following impact pathways are associated with an increase in employment area:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution • Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP10 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP11: Port Solent</p> | <p>Land is allocated at Port Solent for the provision of 500 residential uses and for marine related uses.</p> <p>Development proposals for this will be permitted if they meet site specific requirements including:</p> <ul style="list-style-type: none"> • A conceptual framework masterplan to ensure high quality development responding positively to the existing character and land uses; • Providing buildings designed to a high standard that complement the existing built form • Including measures to avoid and mitigate impacts, including recreational impact, on the adjacent SPA, SSSI and Ramsar Site; • Including measures to protect and enhance the SPA supporting habitats to the south of Marina Keep; • Provide evidence that the site allocation will not result in loss of functionally linked habitat to Solent SPAs/Ramsar (P48A/P48B) • A site specific Flood Risk Assessment should be submitted; • Safeguarding land for flood defence structures. Improved flood defences should be delivered at Port Solent to ensure any development is safe from floodwaters for its lifetime; • Improving facilities for cycling, walking and public transport linking to and enhancing transport networks; • A Travel Plan and Transport Assessment; • Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/or Infrastructure Development Plan | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Port Solent, which allocates new dwellings (500).</p> <p>The following impact pathways are associated with an increase in population size:</p> <ul style="list-style-type: none"> • Recreational pressure (in Habitats sites and functionally linked habitat) • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution • Impacts on flightlines |

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| | <ul style="list-style-type: none"> • Safeguard the existing cinema, gym, retail and restaurant uses from redevelopment; • Providing leisure, retail and restaurant uses at this location unless there is proven to be insufficient • Safeguard pedestrian access to the waterfront; • Ensure the amenity of occupiers / users of any new development can be adequately protected; • Take into account and where appropriate protect viewpoints and the visual impact across Portsmouth Harbour. | <ul style="list-style-type: none"> • Coastal Squeeze <p>Due to these linking impact pathways, Policy PLP11 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP12: St John's College</p> | <p>The policy makes an allocation for land at St John's College for the development of 212 dwellings Development proposals will be permitted if they meet site specific requirements including:</p> <ul style="list-style-type: none"> • Provide a masterplan ensuring development is high quality and provides improved access arrangements • Retaining and restoring historic assets on the site; • Conserving or enhancing Owen's Southsea Conservation area and retaining and protecting trees on the site; • Responding positively to existing heritage assets on the site; • Enhancing pedestrian connectivity through the site • Not preventing public access to the site • Take opportunities for new publicly accessible open space on site; • Creating greening on site; • Providing reduced car parking provision; • A Travel Plan and Transport Assessment. • Flood Management measures | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for St John's College, which allocates new dwellings (212).</p> <p>The following impact pathways are associated with an increase in population size:</p> <ul style="list-style-type: none"> • Recreational pressure (in Habitats sites and functionally linked habitat) • Loss of functionally linked habitat • Water quality • Water quantity, level and flow • Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) • Atmospheric pollution • Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP12 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP13: Fraser Range</p> | <p>Fraser Range is allocated for development of:</p> <ul style="list-style-type: none"> • 134 dwellings; • New sea wall flood defences and a related walkway, including removal and reinstatement of listed tank traps; • Construction of access road, parking and landscaping works. <p>Development proposals will be permitted if they meet development requirements including:</p> <ul style="list-style-type: none"> • Retaining the open green character of the eastern part of the site, and appropriately integrating and enhancing the landscape setting of the rest of the site; • Protecting areas within or near the site that are part of the National Site Network, Ramsar Sites, Sites of Special Scientific Interest (SSSI) and any other designated habitat sites; | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Portsmouth City Centre, which allocates new dwellings (134).</p> <p>The following impact pathways are associated with an increase in population size:</p> <p>Recreational pressure (in Habitats sites and functionally linked habitat) Loss of functionally linked habitat</p> |

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| | <ul style="list-style-type: none"> • A Habitat Regulations Assessment (HRA) of the site, and appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA and/or Solent Maritime SAC; • To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars (P142 / P144). <p>The developer will provide mitigation of any alone impacts on the habitat that is functionally linked to Solent's SPAs / Ramsars (P78 / P142 / P144). This is in addition to the contributions provided through the Solent Recreation Mitigation Strategy.</p> <p>Must respond positively to heritage assets on site</p> <p>Provide a Heritage Statement assessing the significance and impact of all proposals on any heritage assets</p> <p>Land should be safeguarded for the delivery, management and maintenance of a seawall and/or other flood defence(s) for the development lifetime.</p> <p>A site-specific Flood Risk Assessment and surface water management measures</p> <p>Secure the construction of an enhanced and appropriate access road, and landscaping works;</p> <p>Provide safe, appropriate, publicly accessible off-road walking and cycling routes linking the site to the nearby Fort Cumberland Road to the north west, but not increasing disturbance of the ecologically sensitive parts of the site to the east;</p> <p>Development proposals that gate off the whole site and prevent public access will be refused; and</p> <p>A Transport Assessment is required including mitigation measures and sustainable transport initiatives.</p> | <p>Water quality</p> <p>Water quantity, level and flow</p> <p>Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction)</p> <p>Atmospheric pollution</p> <p>Impacts on flightlines</p> <p>Coastal Squeeze</p> <p>Due to these linking impact pathways, Policy PLP13 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP14: The News Centre, Hilsea</p> | <p>The News Centre, as shown on the Policies Map, is allocated for the development of a purpose built all-electric bus depot and 100 homes. Small scale ancillary uses may be allowed depending on the type and scale, impacts on the surrounding area and nearby centres</p> <p>Development proposals for the above named uses must meet site specific development requirements including:</p> <p>High quality design that maximises the development's gateway location</p> <p>Retains and enhances the distinct character and green infrastructure of the site; including protection of trees on and bordering the site with an arboricultural assessment to ensure this occurs;</p> <p>A design that responds to and celebrates the original building's historic presence and architecture;</p> <p>Delivery of homes at the high end of medium density range</p> <p>Incorporating appropriate mitigation and design measures to minimise and protect residential development from harmful noise and air pollution;</p> <p>Access for a high level of use from buses to and from A2047 and A3.</p> <p>Safe and convenient local pedestrian and cycle links particularly along north-south main roads;</p> <p>A Travel Plan and Transport Assessment</p> <p>A site specific Flood Risk Assessment will be prepared and submitted and flood management measures incorporated.</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for The News Centre, Hilsea, which allocates new dwellings (100).</p> <p>The following impact pathways are associated with an increase in population size:</p> <p>Recreational pressure (in Habitats sites and functionally linked habitat)</p> <p>Loss of functionally linked habitat</p> <p>Water quality</p> <p>Water quantity, level and flow</p> <p>Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction)</p> <p>Atmospheric pollution</p> <p>Impacts on flightlines</p> |

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| | | <p>Due to these linking impact pathways, Policy PLP14 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP15: Somers Orchard</p> | <p>Somers Orchard is allocated for the development of 565 dwellings (293 Net), approximately 500sqm commercial space and approximately 440sqm community space.</p> <p>Development proposals for the above-named uses will be permitted provided that they meet the site-specific requirements:</p> <p>Replaces the 272 affordable homes from Horatia and Leamington with new affordable homes;</p> <p>Provides 30% net homes as affordable homes or in case of Build to Rent scheme provides 20% of affordable private rented;</p> <p>Creating open space and landscaping that providing for the needs of the community;</p> <p>Biodiversity Net Gain of at least 20% is demonstrated and secured on site;</p> <p>Improves connectivity, permeability and legibility through the development, prioritised cycling and walking;</p> <p>Includes tall buildings and high density blocks in order to achieve the densities needed to meet the required level of housing;</p> <p>Provides landscaping to enhances the setting of the retained Birmingham Blocks;</p> <p>Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritized.</p> <p>Takes advantage of the site's sustainable location to provide a reduced car parking ratio;</p> <p>Any new build development proposals for the site must respond positively to the presence of nearby heritage assets.</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is the strategic development policy for Somers Orchard, which allocates 566 dwellings (293 net), approximately 500sqm commercial space and approximately 440sqm community space.</p> <p>The following impact pathways are associated with an increase in population size:</p> <ul style="list-style-type: none"> Recreational pressure (in Habitats sites and functionally linked habitat) Loss of functionally linked habitat Water quality Water quantity, level and flow Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) Atmospheric pollution Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP15 is screened in for Appropriate Assessment.</p> |
| <p>Chapter 6 – Housing</p> | | |
| <p>Policy PLP16: Housing Target</p> | <p>The council will make provision for at least 13,603 net additional dwellings between 2020 and 2040. Housing has or will be provided through;</p> <p>Completions (2020-2023)</p> <p>Sites that have planning permission as of 31 March 2023 (with 15% non implementation discount);</p> <p>Strategic sites;</p> <p>Allocations in the local plan;</p> <p>Identified non strategic housing sites from HELAA;</p> <p>Windfall development of small sites;</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This text identifies that the Portsmouth Local Plan will provide for at least 13,603 additional dwellings in the city between 2020 and 2040.</p> <p>The policy also allows for unexpected windfall development, which is inherently difficult to</p> |

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| | <p>Equivalent contribution from HMOs Equivalent contribution from C2 accommodation</p> <p>Contribution to unmet housing need will be sought from neighbouring local authorities including 800 homes in the Fareham Local Plan.</p> <p>Neighbourhood plans that allocate additional land for housing will be supported if they meet local housing need and are in-keeping with the strategic policies of the local plan.</p> | <p>assess because it is not known where and to what degree this may be coming forward.</p> <p>The following impact pathways are associated with an increase in the local population:</p> <ul style="list-style-type: none"> Recreational pressure Loss of functionally linked habitat Water quality Water quantity, level and flow Atmospheric pollution Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) Coastal squeeze Impacts on flightlines <p>Due to these linking impact pathways, Policy PLP16 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP17: Affordable Homes</p> | <p>Policy states that development proposals of 10 or more dwellings must:</p> <ul style="list-style-type: none"> Make on-site provision for 30% of the total residential dwellings as affordable homes Provide a mix of affordable home tenure <p>Affordable homes should be indistinguishable in design and appearance from the open market houses and shall normally be "pepper-potted" around the site.</p> <p>Where there is an indication that a site or development has been artificially split in order to avoid policy requirements by being below the dwelling or site size threshold identified above, the Council will consider whether it would be appropriate to apply the policy requirements to each of the smaller sites individually, irrespective of their number of dwellings or site area, in order to secure the delivery of affordable housing in accordance with this policy.</p> <p>Where development proposals do not meet the policy requirements for affordable housing the applicant will be required to:</p> <ul style="list-style-type: none"> Provide an open book viability assessment, that will be independently reviewed on behalf of the Council at the cost of the applicant, demonstrating that the proposed affordable homes provision has been maximised and all other options have been fully explored; and Demonstrate that the proposal contributes towards creating mixed and balanced communities. <p>Where development proposals have been permitted that do not meet policy threshold requirements on affordable housing, the development will be subject to:</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy establishes the proportion of dwellings in a development that should be offered as affordable housing. However, the type of housing typically has no effect on potential impact pathways relating to Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats Sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

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| | <p>An Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or another period agreed by the Council);</p> <p>A Late Stage Viability Review which is triggered when 75% of the homes in a scheme are sold or let (or another period agreed by the Council); or</p> <p>Mid Term Reviews prior to implementation of phases for larger schemes.</p> <p>On site-provision of new affordable homes will be prioritised. Where this not feasible nor viable, then off-site provision or an appropriate financial contribution to provide affordable housing will be accepted where justified. Off-site provision will preferably be through provision on an alternative site close to the development site.</p> | |
| <p>Policy PLP18: Housing Mix</p> | <p>Policy details how the housing mix of residential developments should be divided, with differing mixes for market rate homes, affordable homes and older persons homes.</p> <p>Deviation from this mix will be granted if there is evidence of local housing need justifying a different mix or site-specific considerations necessitate a different mix.</p> <p>At least 5% of all new market homes should be wheelchair adaptable and 10% of all affordable homes should be wheelchair accessible.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy establishes the different types of housing to be provided in Portsmouth City, including older people's housing, accessible housing and family housing. However, the type of housing typically has no effect on potential impact pathways relating to Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats Sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP19: Housing for Specific Groups</p> | <p>Development proposals for the following specialist housing will be supported where there is a need:</p> <ul style="list-style-type: none"> Self-build and custom-build housing Specialist and Supported housing including older person's housing a and children's/young people's housing Student accommodation Build to Rent Homes Communal/co-living homes Service personnel and service family accommodation <p>Developments including multiple self/custom build homes must have a design framework.</p> <p>Development proposals for purpose built student accommodation will be permitted where:</p> <ul style="list-style-type: none"> Provision is made for cluster flats and not just studios; An appropriate management plan(s) is submitted that demonstrates that a positive and safe living environment is created for students and negative impacts on the local community are minimised; The building(s) is 'future-proofed' in terms of design to support potential alternative and appropriate uses during its lifespan; and | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy establishes the different types of housing to be provided in Portsmouth City, including older people's housing, accessible housing and family housing. However, the type of housing typically has no effect on potential impact pathways relating to Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats Sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

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| | <p>Relevant regard has been had to the Council's Student Halls of Residence SPD91 or future equivalent.</p> <p>Development proposals for Build to Rent homes will be permitted where at least 20% of the units within the scheme are let as Affordable Private Rented units at a discount of 20% to local market rents capped at Local Housing Allowance rates.</p> <p>Development proposals for communal or co-living homes will be permitted where an appropriate management plan is submitted that demonstrates how the site will be adequately managed and negative impacts on the local community are minimised.</p> | |
| <p>Policy PLP20: Houses in Multiple Occupation</p> | <p>In order to support mixed and balanced communities and ensure that a range of household needs continue to be accommodated throughout the city, including development to increase the occupancy of an existing HMO, planning applications for new HMOs and changes of use to a HMO, will only be granted planning permission where:</p> <p>Less than 10% of residential properties within a 50m radius of the area surrounding the application property are in existing use as a HMO;</p> <p>Development does not result in a non-HMO property being 'sandwiched' between HMO properties and does not result in three or more HMO properties in a row</p> <p>Development avoids harm to the amenity of residents; and</p> <p>Developments take account of the HMO Supplementary Planning Guidance.</p> <p>In areas where concentrations of HMOs exceed the 10% threshold, development proposals that intensify the use of an existing HMO, namely change the use of a Class C4 or mixed C3/C4 use to an HMO in Sui Generis use or increase the occupation of an existing HMO, will only be permitted in exceptional circumstances..</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This design management policy sets out the conditions that must be fulfilled for houses in multiple occupation. However, housing occupancy has no bearing on Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP21: Residential Density</p> | <p>Policy Outline the minimum density for residential development within certain areas of the city. These are:</p> <p>High density development of at least 120dph in areas of high accessibility;</p> <p>Medium density development of at least 80dph across the City's core residential areas;</p> <p>Lower density development of at least 40dph in the suburban edge.</p> <p>Where a proposed development has a lower residential density level to the thresholds above, the proposal must be supported by robust evidence and rationale that justifies the proposed density is appropriate and is responding positively to its context.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a development management policy that sets out the housing density guidelines for Portsmouth City. However, housing density is not a criterion with implications for Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

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| Policy PLP22: Residential Space Standards | <p>Where planning permission is required, development proposals for new homes (including change of use or conversions) should ensure that the layout and size are suitable to meet the amenity needs of future occupiers.</p> <p>Planning permission will be granted for new homes that:</p> <ul style="list-style-type: none"> Meet as a minimum the Nationally Described Space Standards (or future equivalent). Provide sufficient on site private and/ or communal outdoor amenity space/ balcony space. Provide sufficient storage space for refuse and recycling | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy identifies required space standards for new residential development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| Policy PLP23: Estate Renewal | <p>Development proposals within Portsmouth City Council's Estates will be supported provided that they meet specific criteria including:</p> <ul style="list-style-type: none"> Making provision for suitable homes to meet the needs of residents, Making provision for accessible facilities and hubs for the community; Making the health and wellbeing of residents central Improving access through improved connectivity; Creating open spaces and play areas and improvements to existing open spaces and amenity areas; Delivering improved, safer pedestrian and cycle routes; and Delivering high quality design and sustainability | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This design management policy sets out requirements that must be fulfilled for developments within Portsmouth City Council's Estates. However, this policy does not allocate any housing development to these areas and as such has no bearing on Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| Policy PLP24: Gypsies, Travellers and Travelling Showpeople | <p>Development proposals for Gypsies, Travellers and Travelling Show people accommodation planning permission will be granted where certain conditions are met including:</p> <ul style="list-style-type: none"> The site being well related to and safe, reasonable access to local services, including schools, shops, community facilities and health and welfare services; Sites should have reasonable access for vehicles, pedestrians and cyclists Sites for permanent accommodation must not be located within Flood Zone 2 or 3; Where proposed for transit or temporary provision, the site must not be located within Flood Zone 3; Sites for permanent or transit accommodation must not be located on contaminated or unstable land unless the land can be appropriately remediated and mitigated as part of proposed development The site is capable of being provided with on-site services including water supply, sewage disposal and power supply; Sites should be landscaped to avoid adverse impacts on the amenity and character of an area, or on the natural and historic environment Sites should have good design and landscaping to ensure residential amenity and privacy for occupants | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy stipulates that accommodation proposals for gypsies, travelers and travelling showpeople will be permitted, provided several criteria are met. However, while in principle allowing for new accommodation, no specific locations or quanta are provided.</p> <p>Therefore, there are no impact pathways that link this policy to Habitats sites. Therefore,</p> |

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| | <p>Site should not cause unacceptable harm to the amenities of neighbouring uses. There should be safe vehicular access and adequate parking.</p> | <p>the policy is screened out from Appropriate Assessment.</p> |
| <p>Chapter 7 – Thriving Economy</p> | | |
| <p>Policy PLP25: Employment Target</p> | <p>Policy states that the council will make provision for at least 138,429 m² of new employment floorspace from 2020-2040 including: 58,645m² office floorspace 15,270m² research and development / industrial processes floor space 64,514m² manufacturing/warehouse floorspace</p> <p>This will be provided from the following source: Completions 2020-2023 Outstanding permissions at 31 March 2023 Strategic Sites allocated in the Local Plan Site allocated for employment in the Local Plan</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is a policy that provides 77,099m² of office floorspace, 29,450m² research and development/industrial employment floorspace, 64,514 m² of manufacturing/warehouse floorspace.</p> <p>The following impact pathways are associated with an increase in employment across Portsmouth City: Loss of functionally linked habitat Water quality Water quantity, level and flow Atmospheric pollution Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) Coastal squeeze Impacts on flightlines</p> <p>Due to these linking impact pathways, Policy PLP25 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP26: Safeguarding Employment Land</p> | <p>Policy outlines the conditions under which redevelopment of employment land will be acceptable: Proposals for the redevelopment of existing employment premises that provide improved employment accommodation, make more efficient use of land and provides a similar number of jobs will be encouraged. Development proposals for the change of use of land and/or premises allocated, currently used or last used for employment purposes to non-employment purposes will only be permitted where it has been demonstrated that the land or premises is not fit for purpose for employment.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy stipulates the requirements for existing employment land</p> |

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| | <p>If the site is not fit for purpose and that there is no market demand for the business premises or land for employment, other commercial uses should be considered in the first instance. Only if another type of economic development cannot be found will other uses such as housing be considered.</p> <p>Development proposals that would result in the loss of marine business premises on waterfront sites will be refused.</p> | <p>to be redeveloped. It does not provide any quanta or allocations for redevelopment.</p> <p>Therefore, there are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP27: Employability and Skills</p> | <p>Development proposals will be permitted where they, as relevant, at both the construction and occupation stages of the scheme:</p> <p>Raise local skill levels and increase employability;</p> <p>Tackle skill shortages in existing and potential business sectors particularly advanced manufacturing and engineering including marine and space businesses, life sciences, creative industries and sustainable construction methods;</p> <p>Address barriers to employment for economically inactive people including the provision of sustainable transport;</p> <p>Provide childcare facilities within or in close proximity to employment sites.</p> <p>Planning applications should where relevant have regard to the Achieving Employment and Skills Plans SPD or future equivalent both at the construction and occupation stages of the development.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy supports development which addresses skill shortages and improves skill levels. It does not provide any quanta or allocations for development.</p> <p>Therefore, there are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment</p> |
| <p>Policy PLP28: Town Centres</p> | <p>Proposals for main town centre uses should be primarily located within the Portsmouth network of centres. Development proposals should contribute positively to the function, vitality and viability of the centre.</p> <p>The Core Commercial Area should be promoted and enhanced as the heart of the centre. Other uses will be acceptable if:</p> <p>It makes a positive contribution to the vitality of the Core Commercial Area and centre overall;</p> <p>It contributes to creating an attractive and vibrant environment through a wide range of complementary uses;</p> <p>It provides an active frontage at ground floor level, with immediate access to the street;</p> <p>It generates pedestrian activity by being open for substantial periods of time to visiting members of the public;</p> <p>There are no significant harmful impacts on the function, on the vitality or viability of the core frontage or Core Commercial Area; and</p> <p>It provides a shopfront or other frontage with a well designed and appropriate display window.</p> <p>Development proposals that would result in the loss of a town centre will need to show that there is no market demand for the premises in its existing use or for another retail, commercial, leisure, cultural and service use.</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is a development management policy that supports the development of Portsmouth's town centres. While no specific quanta are provided, the policy establishes locations in which proposals (e.g. leisure and tourism uses) will be delivered.</p> <p>The provision of further cultural and tourism opportunities is likely to increase the number of temporary visitors to Portsmouth City and are associated with the following impact pathways: Recreational pressure (in Habitats sites and functionally linked habitats)</p> |

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| | <p>Development proposals for a variety of uses including town centre uses and housing on land and/or premises that is within an identified centre but outside the Core Commercial Area will be permitted.</p> <p>Development of new homes and other residential uses, including as part of mixed use proposals, will be acceptable, where there is a high level of accessibility to key services and transport links. Retail, commercial, leisure, cultural and service uses will be encouraged at ground floor level where there is market demand.</p> | <p>Loss of functionally linked habitat Water quality Water quantity, level and flow Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction) Atmospheric pollution Impacts on flightlines Coastal squeeze</p> <p>Due to these linking impact pathways, Policy PLP28 is screened in for Appropriate Assessment.</p> |
| <p>Policy PLP29: Small Local Shops</p> | <p>Policy outlines the conditions for the development of small local shops outside of City, Town, Neighbourhood and Local Centres. These include: A net sale area less than 150m² The shop must sell essential goods and provide day to day shopping and service needs such as food. There is no near by similar facility It provides an active well designed shop frontage Development proposals that would result in the loss of a small local shop outside the City, Town, District and Local Centres will be resisted, and will only be allowed where: There is no market demand for the premises in its existing use, or There is an alternative local shop or service use that meets key day to day needs of the community within close proximity.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy which controls the development of shops outside of central locations. It does not provide any quanta or allocations for redevelopment.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>PLP30: Cultural and Visitor Economy</p> | <p>Proposals that maximise the cultural and visitor economy will be supported in principle. New or enhanced facilities are particularly encouraged at Cultural Quarter and Core Commercial Area as well as other areas identified in the town centre hierarchy.</p> <p>Development proposals should meet certain criteria including: Being of an appropriate type, scale and design Retaining an active and welcoming frontage at ground floor level, attracting pedestrian activity and encouraging linked trips; Ensuring effective access arrangements, including local pedestrian and cycle links; Not having a harmful impact on nearby occupiers due to</p> | <p>Likely Significant Effects on Habitats Sites cannot be excluded.</p> <p>This is a development management policy that supports the delivery of cultural, tourism and leisure facilities, especially in the coastal area of Portsmouth. The provision of further cultural and tourism opportunities is likely to increase the number of temporary visitors to Portsmouth City and are associated with the following impact pathways:</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
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| | <p>Pop up and temporary uses will be encouraged for vacant properties for a period prior to permanent re-occupation or redevelopment.</p> <p>Access to cultural facilities and visitor attractions and the City and town centres should be improved. This may be through enhancement to building design, public realm, signposting and wayfinding.</p> <p>The loss of cultural and tourism facilities in Portsmouth will only be granted where it can be demonstrated that there is no market demand for their existing use or in a related use.</p> <p>Other uses adjacent to cultural and visitor attractions should not undermine the feasibility of these attractions.</p> | <p>Recreational pressure (in Habitats sites and functionally linked habitat)</p> <p>Loss of functionally linked habitat</p> <p>Water quality</p> <p>Water quantity, level and flow</p> <p>Visual and noise disturbance in Habitats sites and functionally linked habitats (during and post-construction)</p> <p>Atmospheric pollution</p> <p>Impacts on flightlines</p> <p>Coastal squeeze</p> <p>Due to these linking impact pathways, Policy PLP30 is screened in for Appropriate Assessment.</p> |
| <p>Chapter 8 – Climate Emergency</p> | | |
| <p>Policy PLP31: Flooding</p> | <p>Development proposals will be permitted if they meet certain criteria including:</p> <ul style="list-style-type: none"> They seek to reduce the impact and extent of flooding They have a site specific Flood Risk Assessment. The proposal meets the sequential and exception tests as set out in Government policy and guidance The development will be safe over its lifetime The development does not impact the integrity of land used for existing or future flood defences The development will not result in the increase of flood risk elsewhere They are appropriately flood resistant and resilient so that in the event of a flood they can be quickly brought back into use without significant refurbishment Appropriate safety measures have been taken. Appropriate safety measures have been taken in accordance with the SFRA Level 1 and 2 specifically in relation to finished floor levels, access/escape routes, places of safety and emergency planning. Site specific Flood Risk Assessments should use the Upper End climate change allowance when assessing flood risk, unless an alternative approach can be justified; Opportunities should be sought to implement natural flood management techniques to attenuate surface water runoff and groundwater discharge; Opportunities for de-culverting watercourse sections should be sought to bolster local channel capacity and conveyance; and Proposals that include self-contained basement accommodation for use as a habitable room will not be permitted due to the unacceptable residual flood risks associated with this type of accommodation. | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy provides requirements for developments focused on mitigating flood risk to development proposals. This policy does not establish any quota or location for development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
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| <p>Policy PLP32: Sustainable Drainage System</p> | <p>Development proposals should:</p> <ul style="list-style-type: none"> not increase existing surface run-off rates reduce surface run off if the proposal is in an area at risk of flooding minimise the amount of hard landscaping and incorporate permeable surfacing to reduce surface water run-off. incorporate methods for rainwater harvesting, such as water butts. <p>Development proposals will be permitted where SuDS are incorporated and meet criteria including:</p> <ul style="list-style-type: none"> They incorporate green infrastructure; They are sensitively located and designed to promote an enhanced landscape/townscape and good quality spaces that improve public amenity; Surface water will be separated and managed within the site, or if not possible suitably disposed of Any surface water resulting from development on greenfield sites will not be permitted to enter the combined or foul water system; and Details for future maintenance over the lifetime of the development shall be included with the proposal as part of a sustainable drainage strategy. <p>Development proposals will be permitted where they provide proportionate evidence to demonstrate that wastewater infrastructure can accommodate or be improved to accommodate the proposals and that appropriate provisions will be made. Where necessary, occupation of development should be phased to align with the delivery of network reinforcement, in liaison with the service provider.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy provides requirements for developments focused on mitigating flood risk to development proposals. This policy does not establish any quota or location for development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP33: Sustainable Construction and Onsite Renewable Energy</p> | <p>Development proposals will be permitted where they are designed to reduce their impact on the environment during construction.</p> <p>Relevant proposals must demonstrate using a Sustainability Statement that all resources are used efficiently, as part of the construction and operation of a building, including consideration of embodied emissions.</p> <p>All developments must follow the principles of the energy hierarchy, to ensure that the design of a building prioritises energy reduction through highly energy efficient fabric measures, lighting, ventilation, and orientation.</p> <p>The retention of existing buildings will be given preference to the demolition and replacement of existing buildings. Retrofitting energy efficiency measures in existing buildings will be supported.</p> <p>Proposals should address rising temperatures and overheating.</p> <p>Development proposals that are powered by solid fossil fuels will not be permitted.</p> <p>Residential development should be designed to meet the 110 litres per person per day water efficiency standard.</p> <p>Development proposals should incorporate Swift Boxes</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy promotes sustainable design and construction in Portsmouth City. Most relevant from an HRA perspective, the policy specifies that new developments will be required to achieve a water efficiency standard of 110l per person per day. This will limit the amount of potable water required and wastewater produced in Portsmouth.</p> <p>Solent's Habitats sites are sensitive to a decline in water quality (primarily due to nitrogen in treated sewage effluent) and changes in the hydrological regime (primarily due to water abstraction). Therefore, this policy contributes to the protection of its ecological integrity.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy</p> |

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| | | <p>is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP34: Renewable Energy</p> | <p>Development proposals for wind turbines and solar arrays will be supported at appropriate locations Development proposals for renewable and low carbon energy generation developments that are led by / meet the needs of local communities will be supported. Where community support is identified for a specific technology at a given location, this will be identified as a preferred location for that technology. Proposals for wind and solar PV farms to re-power at the end of their operational life will be permitted, as long as the turbines and/or solar panels are replaced with new equipment of either the same or larger installed capacity, and subject to compliance with statutory, site-specific and other constraints. The development of Combined Heat and Power networks will be encouraged provided that they use renewable and low carbon forms of energy generation; and b) Individual developments make all reasonable efforts to meet net zero through onsite measures, before connecting to a heat network.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy provides general support and guidance for renewable energy projects it will not in itself lead to any development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP35: Air Quality and Pollution</p> | <p>Planning permission will only be granted where it can be demonstrated that development will not contribute to, be put at unacceptable risk from, and will not be adversely affected by pollution (including cumulative levels) which cannot be addressed through appropriate mitigation, including:</p> <ul style="list-style-type: none"> a. Air quality/ odour/ dust b. Noise c. Vibration d. Light e. Water (including leachate) f. Any other forms of pollution <p>Planning permission will be granted where development proposals demonstrate how determinants of health and wellbeing have been incorporated into the development, and its impact on the mental and physical health and wellbeing of occupiers. Major development proposals must undertake a Health Impact Assessment, demonstrating how the planning application has been informed by the findings of the assessment in regard to air quality. Planning permission will be granted where it addresses any potential impacts of airborne pollution on the natural environment.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a development management policy that states adverse impacts on amenity features, health and in terms of pollution should be avoided. For example, developments must demonstrate that they will not contribute unacceptable risks in terms of air quality, noise, light and water pollution. Solent's Habitats sites are sensitive to all of these impacts and this policy will contribute to their protection.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP36: Coastal Zone</p> | <p>Development proposals on the coast will be permitted where: avoid adverse impacts upon marine and maritime related uses; seek opportunities to maintain and enhance access to the coast. Preserve the character of the coastal zone Protect and where possible enhance key views to and from the Coastal Zone linking the City to its wider landscape setting; Are consistent with the Shoreline Management Plan and South Inshore and South Offshore Marine Plans.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy identifies the conditions required for planning permissions in the Coastal Zone. However, the policy content has no bearing on Habitats sites.</p> |

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| | | <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP37: Contaminated Land</p> | <p>Planning permission will only be granted for development on or near contaminated land where appropriate and sufficient measures can be taken to remediate and/ or satisfactorily mitigate the risk of contamination. Such measures must address the long-term safety of the proposed development, the end users of that development and the natural environment and include the future management of the site.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This development management policy relates to planning permissions on or near contaminated land, ensuring that appropriate measures must be in place to prevent contamination. However, developments on contaminated land are not specifically relevant to Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Chapter 9 – Greening the City</p> | | |
| <p>Policy PLP38: Green infrastructure</p> | <p>Major development will be permitted where it provides or contributes to Green Infrastructure. Development should conserve and enhance the green grid and should meet green infrastructure priorities. Proposals that reduce the quality of the green infrastructure network will only be permitted where suitable mitigation is identified and secured. Development impacting proposed green infrastructure projects should not prejudice its future delivery and should provide a physical connection to it. Proposals which impact the Green Grid should take opportunities to raise awareness of nature as part of the design of the scheme. Development that does not provide onsite green infrastructure as set out above will only be permitted where sustainable alternative green infrastructure provision of an equivalent standard is provided in close proximity to the development.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy protects the natural environment by promoting green infrastructure.</p> <p>There are no impact pathways that link this policy to Habitats Sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP39: Biodiversity</p> | <p>Development proposals will be permitted where they conserve and enhance biodiversity. Development proposals should demonstrate that they: Retain, protect and enhance features of biodiversity interest and ensure appropriate long-term management of those features; Contribute to the creation of larger improved wildlife habitats; Protect and support recovery of rare, notable and priority species;</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy focuses on the natural environment around Portsmouth City, identifying that</p> |

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| | <p>Seek to eradicate or control any invasive non-native species present on site; Contribute to the protection, management and enhancement of biodiversity; Comply with the mitigation hierarchy as set out in national policy. The following hierarchy of site designation will apply in the consideration of development proposals: Internationally Protected Sites: SPAs, SACs and Ramsar Sites, or candidate and formally proposed versions of these designations:</p> <ul style="list-style-type: none"> - Development proposals with the potential to impact alone or in combination on one or more international sites(s) will be subject to an HRA. - Development proposals that will result in any adverse effect on international sites will be refused unless: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should proceed; and adequate compensatory provision is secured. <p>Nationally Protected Sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR):</p> <ul style="list-style-type: none"> - Development proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an Environmental Impact Assessment; - Development proposals should avoid impacts on these nationally protected sites. Development proposals where an adverse effect which cannot be avoided or mitigated on the site's notified special interest features is likely will be refused, unless the benefits clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites. <p>Irreplaceable Habitats (veteran and ancient trees):</p> <ul style="list-style-type: none"> - Development proposals which result in the loss or deterioration of irreplaceable habitats will be refused unless there are exceptional reasons and a suitable compensation strategy exists. <p>Locally protected sites: Local Wildlife Sites (LWS), including Sites of Importance for Nature Conservation (SINC), Locally Protected Sites (Sites of Nature Conservation Importance (SNCI)) and in addition Local Nature Reserves (LNR):</p> <ul style="list-style-type: none"> - Development proposals considered likely to have a significant effect on local sites will be required to assess the impact by means of an Ecological Impact Assessment; - Development proposals that will result in an adverse effect on the integrity of a local site which cannot be avoided or adequately mitigated will be refused, unless exceptional circumstances outweighing the effects are demonstrated. <p>Outside of designated sites:</p> <ul style="list-style-type: none"> - Development proposals should identify and incorporate opportunities to conserve, enhance, restore and recreate priority habitats and ecological networks. Development proposals should contribute and deliver on the aims and objectives of the relevant biodiversity strategies; - Where development adjoins protected sites, buffers should be provided in order to protect and enhance their biodiversity roles; - Opportunities should be taken to create linkages for wildlife between protected sites. | <p>development proposals must avoid harmful effects on biodiversity and / or ecology. Furthermore, the policy also extends protection to internationally designated sites, by setting out that planning permission will be refused where a proposal has an adverse effect on a SAC, SPA or Ramsar site without compensatory provision. The importance of nature protection is also highlighted in the policy's supporting text, which places international sites at the highest level in the protection hierarchy. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP40: Biodiversity Net Gain</p> | <p>Development proposals (except exempt development) will be permitted where they: Demonstrate at least a 10% net gain for biodiversity, accounted for in a biodiversity net gain plan. Development proposals should prioritise on site Biodiversity Net Gain and only use offsite banks and credits where this is not achievable.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> |

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| | <p>Development proposals within the strategic sites of Portsmouth City Centre and Lakeside and the allocation site of Somers Orchard must demonstrate a 20% net gain for biodiversity accounted for in a biodiversity net gain plan.</p> | <p>This policy provides requirements for biodiversity net gain in development proposals within the local plan area.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP41: Trees & Hedgerows</p> | <p>Planning permission for development will be granted where: Proposals must have been informed and influenced by the presence of trees on the site, with regard to any Tree Preservation Order designations; The need for and benefits of the development outweigh loss or deterioration of woodlands, hedgerows or trees of high amenity value; Tree canopy cover is increased in line with the Natural England Green Infrastructure Urban Tree Canopy Cover Standard as follows:</p> <ul style="list-style-type: none"> - Tree canopy cover of at least 15% is provided on new major development - Replace lost trees at a ratio of 1:1 <p>Development proposals resulting in the loss or deterioration of aged or veteran trees, or impacting on their immediate surroundings, will be refused unless there are wholly exceptional reasons, as defined by national policy, and a suitable compensation strategy has been agreed in writing with the Council.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy provides requirements for biodiversity net gain in development proposals within the local plan area.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP42: Solent Waders and Brent Geese Sites</p> | <p>Functionally linked sites which are used by Solent Waders and/or Brent Geese will be protected from adverse impacts commensurate to their status in the hierarchy of the Solent Wader and Brent Geese Network as outlined in the Solent Waders and Brent Goose Strategy. Proposals that impact the functionally linked sites will need to provide mitigation as set out in the Solent Waders and Brent Goose Strategy (Guidance on Mitigation and Off- setting Requirements) document, and future updated guidance.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a positive policy that protects areas used by waders and Brent Geese.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP43: Recreational Disturbance on International Nature Designations</p> | <p>Planning permission for proposals resulting in a net increase in residential units will be permitted where a financial contribution is made towards the Solent Recreation Mitigation Strategy. In the absence of a financial contribution towards the Solent Recreation Mitigation Strategy, proposals will need to avoid or mitigate any in combination negative effects from recreation through a developer-provided package of measures for the lifetime of the development. Development should avoid noise disturbance impacts on birds at the SPA sites and/or at identified terrestrial SPA supporting habitat sites though the overwintering period.</p> | <p>The are no Likely Significant Effects on Habitats Sites.</p> <p>This is a policy that seeks to protect Internationally Designated Sites by requiring a financial contribution to the Solent Recreation Mitigation Strategy. This policy does not</p> |

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| | | <p>allocate any sites for development and does not set a quanta for growth.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP44: Nutrient Neutrality in International Nature Designations</p> | <p>Development proposals (except exempt development) will be permitted where they demonstrate through a nutrient budget that they secure Nutrient Neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits or a mixture of these</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a positive policy that requires nutrient neutrality for development proposals within the plan area.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP45: Open Space</p> | <p>Proposals should seek to create, protect and/or enhance open space and accessibility to open space where possible. Enhancements of existing open spaces should seek to maximise their quality and multi-functionality.</p> <p>Any proposals that would result in the net loss of open space will be refused, unless: Provision is surplus to requirements; or The loss would be adequately replaced Development would provide alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use; or There are wider public benefits which outweigh the harm of the loss.</p> <p>Development proposals for 50 or more new homes will be expected to provide open space to the ratio of 1.65 ha per 1,000 people. Where this is not feasible, off-site enhancement or developer contribution may be agreed</p> <p>The nature of new open space provision should consider the needs of the intended occupants and that of the local area, and the need to provide multi-functional spaces where practicable.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy specifies that new developments should create, protect or enhance existing open spaces, maximizing their quality and functionality. Furthermore, developments of more than 50 dwellings are to provide publicly accessible open space at the standard of 1.65ha per 1,000 people.</p> <p>The provision of additional open space is standard statutory requirement and helps in diverting recreational pressure away from more sensitive sites. Proximity to home is a very important factor in determining site usage and the inclusion of an appropriate amount of open space in large residential developments is considered to be positive for Solent's Habitats sites.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy</p> |

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| | | <p>is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP46: Local Green Spaces</p> | <p>The following green areas are designated and protected as Local Green Spaces:</p> <p>Southsea Common West, St Thomas & St Jude Southsea Common East, Eastney & Craneswater Kingston Park, Fratton Tamworth Park, Baffins Baffins Pond and Tangier Field, Baffins Great Salterns Recreation Ground, Baffins Hilsea Lines, Hilsea Alexandra Park, Hilsea College Park, Hilsea Gatcombe Gardens, Hilsea Gurnard Road Park, Cosham Cosham Park, Cosham King George Playing Field, Cosham Drayton Park, Drayton & Farlington Farlington and St John's College Playing fields and Farlington Triangle Farlington Marshes Nature Reserve, Drayton & Farlington Portsdown Hill Stamshaw Fields, Nelson Victoria Park, Charles Dickens Land at Leominster Road, Hempsted Green and Paulsgrove Park, Paulsgrove Highland Road Cemetery, Eastney and Craneswater Kingston Cemetery, Fratton</p> | <p>There are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a development management policy that designates several green areas to be Local Green Spaces.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP47: Movement and Transport</p> | <p>Development proposals will be permitted where they deliver a people centred travel network that prioritises walking, cycling, public and shared transport, in line with LTP4, and which is compatible with the Council's Climate Emergency pledge</p> <p>Improvements to transport infrastructure that align with the aims of the Local Transport Plan will be supported.</p> <p>Development proposals that are in highly accessible locations and facilitate access to sustainable transport will be permitted.</p> <p>Development proposals should contribute to the delivery of a network of walking and cycling routes throughout the City.</p> <p>Applications should be supported by a Travel Plan along with a Transport Statement or Transport Assessment.</p> <p>Development proposals should protect and enhance highway safety. Any significant detrimental impacts must be mitigated as approved by the Local Highway Authority.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy promotes a reduction in travel and the use of sustainable transport modes, such as walking, cycling and public transport. It explicitly gives priority to pedestrian and cycle movements, facilitating high levels of permeability.</p> <p>Overall, this policy is likely to have a positive effect on well-being, as well as helping to protect Habitats sites. Reducing the need for</p> |

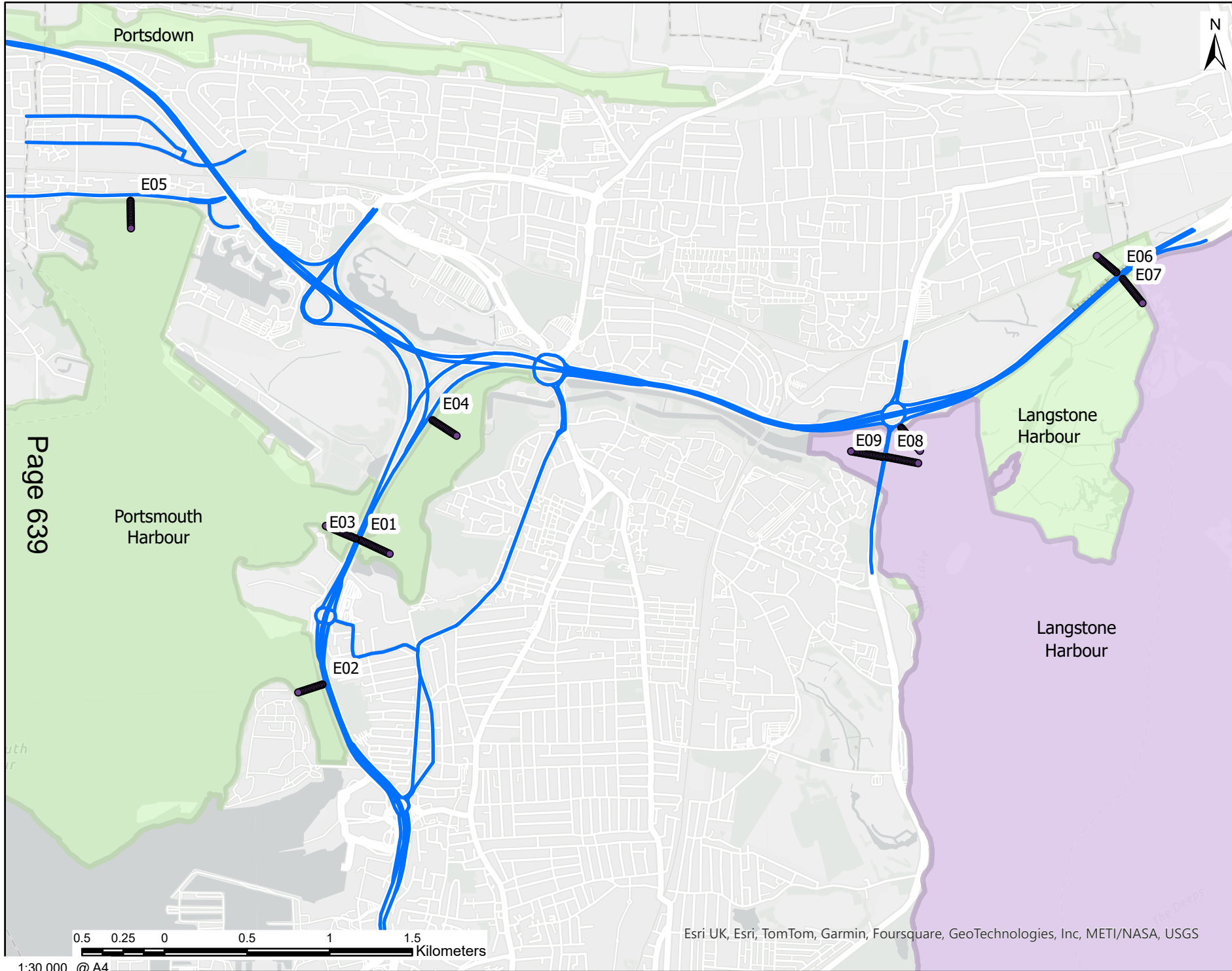
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| | <p>The design and site layout of new development must protect the safety and amenity of all and give priority to the needs of pedestrians, cyclists, users of mobility aids and other non-motorised forms of transport. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.</p> <p>Development proposals must accommodate the needs of people with disabilities by all modes of transport.</p> <p>All proposals should allow for delivery of goods and access by service and emergency vehicles.</p> <p>All proposals must maintain or enhance all transport interchanges and sustainable transport facilities where relevant.</p> | <p>individual car-based travel will reduce the amount of nitrogen deposition on sensitive habitats.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP48: Access and Parking</p> | <p>Development should be designed in a way that discourages car use and encourages travel by other means. If parking is deemed desirable for the development it should meet parking standards.</p> <p>If parking is deemed desirable or necessary as part of a development it should be provided in accordance with the Parking Standards set out in the Parking Standards and Transport Assessments SPD or future equivalent and made neighbourhood plans as relevant. All new private and public parking provision must:</p> <ul style="list-style-type: none"> • Not give rise to unacceptable adverse impacts on amenity; • Be of a location, scale, layout and design that reflects its context; • Incorporate appropriate sustainable drainage systems; and • Where feasible, incorporate green infrastructure and renewable energy. <p>New development should include infrastructure for electric and ultra-low emission vehicles and consider shared transport options.</p> <p>Development proposals should provide sufficient levels of cycle and other micro-mobility parking to serve the needs of that development.</p> <p>Development proposals will be permitted where on and off-street parking provision and access protects a highway safety. Any significant impacts must be mitigated.</p> <p>Development proposals should provide parking facilities compatible for all users, including those with disabilities and reduced mobility.</p> <p>Proposals which result in an increase in the number of access points onto primary and distributor roads will not normally be permitted.</p> | <p>There are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy details parking and access restrictions for new developments. It specifically promotes the encouragement of sustainable transport modes. It explicitly gives priority to pedestrian and cycle movements, facilitating high levels of permeability.</p> <p>Overall, this policy is likely to have a positive effect on well-being, as well as helping to protect Habitats sites. Reducing the need for individual car-based travel will reduce the amount of nitrogen deposition on sensitive habitats.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP49: Public Realm</p> | <p>Development proposals should enhance the public realm, ensuring that:</p> <p>It is safe, healthy, accessible for all, inclusive, multifunctional, attractive, well-connected, legible and easy to maintain, and that it relates to the local, cultural and historic context;</p> <p>Measures to prevent Violence Against Women and Girls (VAWG) have been incorporated;</p> <p>Design is of the highest quality;</p> <p>Street clutter is avoided;</p> <p>It encourages walking and cycling and eases movement within the city;</p> <p>Integration into key corridors and provides ease of access to areas of public convenience and amenity.</p> <p>Major development proposals and allocated sites will be expected to create and enhance the public realm, supporting the wider sustainability of the city and providing social and environmental benefits.</p> | <p>There are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a design management policy which details how developments should interact with the public realm.</p> <p>This policy state that development should improve the quality of public spaces.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy</p> |

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| | <p>The Council will support the delivery of public art that helps to enhance the public realm.</p> | <p>is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP50: Infrastructure Delivery</p> | <p>Development proposals will be required to: Demonstrate appropriate infrastructure investment through on or off site works and/or financial contributions. The whole life cost of infrastructure provision has been considered and mechanisms are in place for its future maintenance/care; A programme of delivery has been agreed with the relevant infrastructure provider(s) prior to commencement.</p> <p>Delivery of infrastructure should be integrated with development phasing to ensure prompt delivery.</p> <p>The provision of new or improved utility infrastructure by service providers will be supported in principle where it meets identified strategic and/or community needs, or enhances protection of the environment.ies</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy stipulates that development proposals will be required to provide or make financial contributions to relevant infrastructure, which may cover various types of infrastructure relating to transport, open space, water supply and wastewater.</p> <p>While no specific detail is provided, this is a positive policy from an HRA perspective. This is because it ensures that the necessary infrastructure to accommodate development is provided.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP51: Electronic Communication and Utilities Infrastructure</p> | <p>Development proposals for new electronic communications and/or utilities infrastructure will be permitted where; The most efficient use of existing electronic communication networks and utilities infrastructure has been fully explored and the need cannot be met using existing infrastructure; They are of an appropriate design; They minimise environmental impacts; They remove, reduce in prominence, or move underground related existing infrastructure, where feasible. Where one or more infrastructure providers have agreed to provide superfast broadband connectivity or full fibre, the development should be designed to connect to this service. Development proposals will be expected to be served by superfast broadband connection as a minimum and full fibre connections where available. If this cannot be achieved, it must be demonstrated that this would not be deliverable.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This is a design management policy that requires developments be suitable for superfast broadband or full fibre. It also stipulates requirements for development of communications and utility infrastructure.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP52: New & Existing Community & Leisure Facilities</p> | <p>Development proposals for new and/or expanded community and leisure facilities will be permitted where: The site is accessible and inclusive; Appropriate consideration has been given to the shared use, re-use and/or redevelopment of existing buildings; The scale of the proposed infrastructure is proportionate.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy provides criteria under which change of use, or loss of premises or land used for community facilities would be considered.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|---|--|---|
| | <p>Developments resulting in the change of use or loss of premises or land in use as a community facility must demonstrate there is no market demand for the existing use or an equivalent community use, for commercially run facilities</p> <p>For community or publicly owned or managed facilities, there is no longer a need for the facility or an equivalent community use and its retention would not be practical or viable;</p> <p>Alternative community facilities are provided that are accessible, inclusive and available, and of an equivalent or better quality to those lost, without causing unreasonable reduction or shortfall in the local service provision.</p> <p>Development proposals for community and leisure facilities that are listed as Assets of Community Value will be subject to a six month statutory delay on sale.</p> | <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP53: Historic Environment Policy</p> | <p>Development proposals will only be permitted where they conserve or enhance the City's heritage assets. Development proposals which affect heritage assets, or their setting, will be determined with regard to the significance of the asset. Proposals which are considered to substantially harm the significance of a designated heritage asset will not be permitted except in exceptional circumstances.</p> <p>Where a development proposal would impact on the fabric or setting of a designated or non-designated heritage asset, the applicant will be required to provide a supporting Heritage Statement (HS).</p> <p>Development proposals that would improve the condition of heritage assets that are considered to be 'at risk' through neglect, decay or other threats will be encouraged and supported.</p> <p>Development proposals which secure the long term conservation or enhancement of redundant or under-used heritage assets including their setting through their optimal/ viable (re)use will be supported.</p> <p>Proposals for alteration and/ or extension that conserve or enhance the significance of non-designated heritage assets will be supported. Non-designated heritage assets should be retained where appropriate.</p> <p>Any development proposals relating to a registered park or garden that would lead to harm to its significance will not be permitted, unless the public benefits associated with the proposal are considered to outweigh that harm.</p> <p>Development proposals for works to heritage assets that are intended to adapt to, or mitigate the effects of, climate change will be supported where it can be clearly demonstrated that they conserve the fabric and/or setting of the asset.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy protects the historic environment from the impacts of development. It makes no allocations for any development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>PLP54: Listed Buildings</p> | <p>Development proposals which affect a listed building, or its setting will only be permitted and Listed Building Consent and or Planning Permission granted where:</p> <p>They preserve or enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or Harm to the significance of the listed building or its setting is minimised and considered to be outweighed by public benefits by the Council, In such circumstances appropriate mitigation measures will be expected, including archaeological investigation including a written report or recording.</p> <p>Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy protects existing listed buildings from negative impacts of development. It makes no allocations for any development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

| Policy Number / Name | Policy Summary | Test of Likely Significant Effect |
|--|---|---|
| <p>Policy PLP55: Conservation Areas</p> | <p>Development proposals within a conservation area will be permitted where they preserve/enhance the character of the conservation area.</p> <p>Development in a conservation area will be permitted where:</p> <p>Architectural features which contribute to the character of an area are retained;</p> <p>There is no adverse impact on the townscape and roofscape of the conservation area,</p> <p>A high standard of design has been applied and good quality materials are proposed to be used;</p> <p>Trees, open spaces and other landscape features are protected.</p> <p>Within a conservation area, development proposals involving the total or substantial demolition of buildings or structures will only be permitted where:</p> <p>The current buildings or structures make an insufficient positive contribution to the conservation area;</p> <p>A replacement building of equal or greater quality is proposed.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy protects areas that are designated as conservations areas from unsuitable development. It makes no allocations for any development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |
| <p>Policy PLP56: Archeology</p> | <p>Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting.</p> <p>There will be a presumption in favour of preservation in-situ for Scheduled Monuments and equivalently significant archaeological heritage assets.</p> <p>Development proposals that would result in unavoidable harm to, or loss of, an archaeological heritage asset's significance, will only be permitted where there is clear justification in terms of benefits from the development which outweigh that harm and also meet the following requirements:</p> <p>There is no less harmful viable option;</p> <p>The amount of harm has been reduced to the minimum possible.</p> <p>The city's archaeological ALERT layers should be used to identify sites where unrecorded archaeology may be present and research such as a desk-based assessment should be carried out.</p> <p>In those cases where archaeological intervention and recording is considered appropriate to take place the resulting archive should be deposited with Portsmouth Museum and a copy of the report with the city's HER.</p> | <p>The are no Likely Significant Effects of this policy on Habitats Sites.</p> <p>This policy protects the archeological heritage assets from negative impacts of development. It makes no allocations for any development.</p> <p>There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.</p> |

Appendix C Air Quality Modelled Transects



This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or used for any other purpose without the prior written consent of AECOM. AECOM does not warrant the accuracy of the information contained in this document. All measurements must be obtained from the issued dimension lines.

Appendix D Air quality modelling results

| Transect / Receptor | Total Annual Mean NOx (µg/m ³) | | | | Total Annual Mean NH ₃ (µg/m ³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|--|-------|-------|-------|--|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E1_4.9m | 86.55 | 25.37 | 27.78 | 28.30 | 3.89 | 3.89 | 5.09 | 5.26 | 29.74 | 24.95 | 31.37 | 32.29 |
| E1_10m | 70.82 | 23.69 | 25.45 | 25.86 | 3.17 | 3.17 | 4.05 | 4.18 | 25.04 | 21.07 | 25.80 | 26.50 |
| E1_20m | 57.63 | 22.29 | 23.49 | 23.79 | 2.56 | 2.56 | 3.18 | 3.26 | 21.07 | 17.82 | 21.09 | 21.57 |
| E1_30m | 51.35 | 21.62 | 22.56 | 22.78 | 2.28 | 2.28 | 2.75 | 2.82 | 19.16 | 16.28 | 18.82 | 19.20 |
| E1_40m | 47.58 | 21.22 | 22.00 | 22.18 | 2.10 | 2.10 | 2.50 | 2.55 | 18.01 | 15.36 | 17.46 | 17.77 |
| E1_50m | 45.04 | 20.95 | 21.62 | 21.77 | 1.99 | 1.99 | 2.33 | 2.37 | 17.24 | 14.73 | 16.53 | 16.80 |
| E1_60m | 43.20 | 20.75 | 21.34 | 21.48 | 1.91 | 1.91 | 2.20 | 2.24 | 16.67 | 14.28 | 15.86 | 16.09 |
| E1_70m | 41.80 | 20.60 | 21.13 | 21.25 | 1.84 | 1.84 | 2.10 | 2.14 | 16.25 | 13.94 | 15.35 | 15.55 |
| E1_80m | 40.70 | 20.49 | 20.96 | 21.07 | 1.79 | 1.79 | 2.03 | 2.06 | 15.91 | 13.67 | 14.94 | 15.13 |
| E1_90m | 39.81 | 20.39 | 20.83 | 20.93 | 1.75 | 1.75 | 1.97 | 2.00 | 15.63 | 13.45 | 14.61 | 14.78 |
| E1_100m | 39.07 | 20.31 | 20.72 | 20.81 | 1.72 | 1.72 | 1.92 | 1.95 | 15.41 | 13.27 | 14.34 | 14.50 |
| E1_110m | 38.45 | 20.25 | 20.63 | 20.71 | 1.69 | 1.69 | 1.87 | 1.90 | 15.22 | 13.12 | 14.11 | 14.26 |
| E1_120m | 37.92 | 20.19 | 20.55 | 20.62 | 1.67 | 1.66 | 1.84 | 1.86 | 15.05 | 12.99 | 13.91 | 14.05 |
| E1_130m | 37.46 | 20.14 | 20.48 | 20.55 | 1.64 | 1.64 | 1.81 | 1.83 | 14.91 | 12.88 | 13.74 | 13.87 |
| E1_140m | 37.06 | 20.10 | 20.42 | 20.48 | 1.63 | 1.63 | 1.78 | 1.80 | 14.79 | 12.78 | 13.60 | 13.72 |
| E1_150m | 36.71 | 20.06 | 20.36 | 20.43 | 1.61 | 1.61 | 1.75 | 1.77 | 14.68 | 12.70 | 13.47 | 13.58 |
| E1_160m | 36.40 | 20.03 | 20.32 | 20.37 | 1.60 | 1.60 | 1.73 | 1.75 | 14.58 | 12.62 | 13.35 | 13.46 |
| E1_170m | 36.12 | 20.00 | 20.27 | 20.33 | 1.58 | 1.58 | 1.71 | 1.73 | 14.50 | 12.55 | 13.24 | 13.35 |
| E1_180m | 35.87 | 19.97 | 20.23 | 20.29 | 1.57 | 1.57 | 1.69 | 1.71 | 14.42 | 12.49 | 13.15 | 13.25 |
| E1_190m | 35.65 | 19.95 | 20.20 | 20.25 | 1.56 | 1.56 | 1.68 | 1.70 | 14.35 | 12.43 | 13.07 | 13.16 |

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| Transect / Receptor | Total Annual Mean NOx (µg/m³) | | | | Total Annual Mean NH ₃ (µg/m³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|-------------------------------|-------|-------|-------|---|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E1_200m | 35.44 | 19.93 | 20.17 | 20.22 | 1.55 | 1.55 | 1.66 | 1.68 | 14.29 | 12.38 | 12.99 | 13.08 |
| E2_15.45m | 61.00 | 27.44 | 28.54 | 28.65 | 2.48 | 2.48 | 3.01 | 3.07 | 19.92 | 16.83 | 19.67 | 20.01 |
| E2_20m | 57.31 | 27.05 | 27.99 | 28.08 | 2.31 | 2.31 | 2.76 | 2.82 | 18.81 | 15.94 | 18.35 | 18.65 |
| E2_30m | 52.29 | 26.52 | 27.24 | 27.31 | 2.08 | 2.08 | 2.43 | 2.47 | 17.29 | 14.71 | 16.56 | 16.79 |
| E2_40m | 49.32 | 26.20 | 26.79 | 26.86 | 1.95 | 1.95 | 2.23 | 2.27 | 16.39 | 13.99 | 15.50 | 15.69 |
| E2_50m | 47.34 | 25.99 | 26.50 | 26.55 | 1.86 | 1.86 | 2.10 | 2.13 | 15.78 | 13.50 | 14.79 | 14.96 |
| E2_60m | 45.91 | 25.84 | 26.28 | 26.33 | 1.79 | 1.79 | 2.00 | 2.03 | 15.34 | 13.15 | 14.28 | 14.43 |
| E2_70m | 44.82 | 25.72 | 26.12 | 26.17 | 1.74 | 1.74 | 1.93 | 1.95 | 15.01 | 12.89 | 13.89 | 14.02 |
| E2_80m | 43.97 | 25.63 | 25.99 | 26.04 | 1.70 | 1.70 | 1.87 | 1.90 | 14.74 | 12.68 | 13.58 | 13.71 |
| E2_90m | 43.29 | 25.56 | 25.89 | 25.93 | 1.67 | 1.67 | 1.83 | 1.85 | 14.53 | 12.51 | 13.34 | 13.45 |
| E2_100m | 42.72 | 25.50 | 25.80 | 25.84 | 1.65 | 1.65 | 1.79 | 1.81 | 14.36 | 12.37 | 13.13 | 13.24 |
| E2_110m | 42.24 | 25.45 | 25.73 | 25.77 | 1.62 | 1.62 | 1.76 | 1.77 | 14.21 | 12.25 | 12.96 | 13.06 |
| E2_120m | 41.83 | 25.41 | 25.67 | 25.71 | 1.61 | 1.60 | 1.73 | 1.75 | 14.08 | 12.15 | 12.81 | 12.91 |
| E2_130m | 41.48 | 25.37 | 25.62 | 25.65 | 1.59 | 1.59 | 1.71 | 1.72 | 13.97 | 12.06 | 12.69 | 12.77 |
| E2_140m | 41.17 | 25.33 | 25.57 | 25.61 | 1.58 | 1.57 | 1.68 | 1.70 | 13.88 | 11.98 | 12.57 | 12.66 |
| E2_150m | 40.89 | 25.31 | 25.53 | 25.56 | 1.56 | 1.56 | 1.67 | 1.68 | 13.79 | 11.92 | 12.47 | 12.55 |
| E2_160m | 40.65 | 25.28 | 25.49 | 25.53 | 1.55 | 1.55 | 1.65 | 1.66 | 13.71 | 11.86 | 12.39 | 12.46 |
| E2_170m | 40.44 | 25.26 | 25.46 | 25.49 | 1.54 | 1.54 | 1.63 | 1.65 | 13.65 | 11.80 | 12.31 | 12.38 |
| E3_3.9m | 78.33 | 24.48 | 26.67 | 27.61 | 3.47 | 3.47 | 4.72 | 4.95 | 27.09 | 22.71 | 29.36 | 30.61 |
| E3_10m | 60.87 | 22.63 | 24.01 | 24.54 | 2.69 | 2.69 | 3.46 | 3.59 | 21.96 | 18.53 | 22.62 | 23.34 |
| E3_20m | 50.67 | 21.54 | 22.47 | 22.78 | 2.24 | 2.24 | 2.74 | 2.82 | 18.91 | 16.07 | 18.73 | 19.17 |
| E3_30m | 45.90 | 21.04 | 21.75 | 21.97 | 2.02 | 2.02 | 2.40 | 2.46 | 17.48 | 14.92 | 16.93 | 17.25 |
| E3_40m | 43.08 | 20.74 | 21.32 | 21.49 | 1.90 | 1.90 | 2.20 | 2.25 | 16.62 | 14.24 | 15.87 | 16.12 |

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| Transect / Receptor | Total Annual Mean NOx (µg/m³) | | | | Total Annual Mean NH ₃ (µg/m³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|-------------------------------|-------|-------|-------|---|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E3_50m | 41.19 | 20.54 | 21.04 | 21.17 | 1.81 | 1.81 | 2.07 | 2.11 | 16.05 | 13.78 | 15.15 | 15.36 |
| E3_60m | 39.83 | 20.39 | 20.83 | 20.94 | 1.75 | 1.75 | 1.97 | 2.01 | 15.63 | 13.45 | 14.64 | 14.82 |
| E3_70m | 38.79 | 20.28 | 20.68 | 20.77 | 1.70 | 1.70 | 1.90 | 1.93 | 15.31 | 13.20 | 14.25 | 14.41 |
| E3_80m | 37.97 | 20.20 | 20.55 | 20.64 | 1.67 | 1.67 | 1.84 | 1.87 | 15.06 | 13.00 | 13.95 | 14.09 |
| E3_90m | 37.31 | 20.13 | 20.45 | 20.53 | 1.64 | 1.64 | 1.80 | 1.82 | 14.86 | 12.84 | 13.70 | 13.83 |
| E3_100m | 36.77 | 20.07 | 20.37 | 20.44 | 1.61 | 1.61 | 1.76 | 1.78 | 14.69 | 12.71 | 13.50 | 13.61 |
| E3_110m | 36.31 | 20.02 | 20.30 | 20.36 | 1.59 | 1.59 | 1.73 | 1.75 | 14.55 | 12.60 | 13.32 | 13.43 |
| E3_120m | 35.91 | 19.98 | 20.24 | 20.30 | 1.57 | 1.57 | 1.70 | 1.72 | 14.43 | 12.50 | 13.18 | 13.27 |
| E3_130m | 35.57 | 19.94 | 20.19 | 20.24 | 1.56 | 1.56 | 1.68 | 1.69 | 14.33 | 12.42 | 13.05 | 13.14 |
| E3_140m | 35.28 | 19.91 | 20.15 | 20.19 | 1.54 | 1.54 | 1.66 | 1.67 | 14.23 | 12.34 | 12.94 | 13.02 |
| E3_150m | 35.02 | 19.88 | 20.11 | 20.15 | 1.53 | 1.53 | 1.64 | 1.65 | 14.15 | 12.28 | 12.84 | 12.92 |
| E3_160m | 34.78 | 19.86 | 20.07 | 20.11 | 1.52 | 1.52 | 1.62 | 1.63 | 14.08 | 12.22 | 12.75 | 12.83 |
| E3_170m | 34.58 | 19.84 | 20.04 | 20.08 | 1.51 | 1.51 | 1.61 | 1.62 | 14.02 | 12.17 | 12.68 | 12.75 |
| E3_180m | 34.39 | 19.82 | 20.01 | 20.05 | 1.50 | 1.50 | 1.59 | 1.61 | 13.96 | 12.13 | 12.61 | 12.67 |
| E3_190m | 34.22 | 19.80 | 19.99 | 20.02 | 1.50 | 1.50 | 1.58 | 1.59 | 13.91 | 12.09 | 12.54 | 12.61 |
| E3_200m | 34.07 | 19.78 | 19.96 | 20.00 | 1.49 | 1.49 | 1.57 | 1.58 | 13.86 | 12.05 | 12.48 | 12.55 |
| E4_26.1m | 64.04 | 30.19 | 31.06 | 31.33 | 1.97 | 1.97 | 2.29 | 2.35 | 17.49 | 15.13 | 16.87 | 17.17 |
| E4_30m | 63.34 | 30.12 | 30.93 | 31.17 | 1.93 | 1.93 | 2.23 | 2.28 | 17.25 | 14.93 | 16.56 | 16.83 |
| E4_40m | 62.00 | 29.97 | 30.67 | 30.87 | 1.86 | 1.86 | 2.12 | 2.16 | 16.78 | 14.54 | 15.95 | 16.19 |
| E4_50m | 61.03 | 29.87 | 30.48 | 30.65 | 1.81 | 1.81 | 2.04 | 2.08 | 16.45 | 14.26 | 15.52 | 15.72 |
| E4_60m | 60.29 | 29.79 | 30.34 | 30.49 | 1.77 | 1.77 | 1.98 | 2.01 | 16.19 | 14.05 | 15.19 | 15.38 |
| E4_70m | 59.69 | 29.72 | 30.23 | 30.36 | 1.74 | 1.74 | 1.93 | 1.96 | 15.99 | 13.88 | 14.93 | 15.10 |
| E4_80m | 59.20 | 29.67 | 30.14 | 30.26 | 1.71 | 1.71 | 1.89 | 1.92 | 15.82 | 13.74 | 14.72 | 14.88 |

| Transect / Receptor | Total Annual Mean NOx (µg/m³) | | | | Total Annual Mean NH ₃ (µg/m³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|-------------------------------|-------|-------|-------|---|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E4_90m | 58.79 | 29.62 | 30.06 | 30.17 | 1.69 | 1.69 | 1.86 | 1.88 | 15.68 | 13.63 | 14.54 | 14.68 |
| E4_100m | 58.43 | 29.59 | 30.00 | 30.10 | 1.67 | 1.67 | 1.83 | 1.85 | 15.56 | 13.53 | 14.39 | 14.52 |
| E4_110m | 58.12 | 29.55 | 29.94 | 30.04 | 1.65 | 1.65 | 1.80 | 1.83 | 15.45 | 13.44 | 14.25 | 14.38 |
| E4_120m | 57.85 | 29.52 | 29.89 | 29.98 | 1.64 | 1.64 | 1.78 | 1.80 | 15.36 | 13.36 | 14.14 | 14.26 |
| E4_130m | 57.60 | 29.50 | 29.85 | 29.93 | 1.63 | 1.63 | 1.76 | 1.78 | 15.28 | 13.29 | 14.03 | 14.15 |
| E4_140m | 57.38 | 29.47 | 29.81 | 29.89 | 1.61 | 1.61 | 1.75 | 1.76 | 15.20 | 13.23 | 13.94 | 14.05 |
| E4_150m | 57.19 | 29.45 | 29.77 | 29.85 | 1.60 | 1.60 | 1.73 | 1.75 | 15.14 | 13.18 | 13.86 | 13.96 |
| E4_160m | 57.01 | 29.43 | 29.74 | 29.81 | 1.60 | 1.59 | 1.72 | 1.73 | 15.07 | 13.13 | 13.78 | 13.88 |
| E4_170m | 56.85 | 29.41 | 29.71 | 29.78 | 1.59 | 1.59 | 1.70 | 1.72 | 15.02 | 13.08 | 13.71 | 13.80 |
| E4_180m | 56.70 | 29.40 | 29.69 | 29.75 | 1.58 | 1.58 | 1.69 | 1.71 | 14.97 | 13.04 | 13.65 | 13.74 |
| E4_190m | 56.56 | 29.38 | 29.66 | 29.72 | 1.57 | 1.57 | 1.68 | 1.70 | 14.92 | 13.00 | 13.59 | 13.68 |
| E4_200m | 56.43 | 29.37 | 29.64 | 29.70 | 1.57 | 1.56 | 1.67 | 1.68 | 14.88 | 12.97 | 13.53 | 13.62 |
| E5_32.95m | 33.66 | 18.80 | 19.05 | 19.08 | 1.74 | 1.68 | 1.79 | 1.80 | 16.96 | 14.55 | 15.15 | 15.21 |
| E5_40m | 32.86 | 18.71 | 18.94 | 18.97 | 1.69 | 1.63 | 1.73 | 1.74 | 16.63 | 14.32 | 14.85 | 14.91 |
| E5_50m | 32.06 | 18.62 | 18.82 | 18.85 | 1.63 | 1.59 | 1.68 | 1.69 | 16.30 | 14.09 | 14.56 | 14.61 |
| E5_60m | 31.48 | 18.56 | 18.74 | 18.77 | 1.60 | 1.56 | 1.64 | 1.65 | 16.06 | 13.93 | 14.35 | 14.40 |
| E5_70m | 31.05 | 18.51 | 18.68 | 18.71 | 1.57 | 1.54 | 1.61 | 1.62 | 15.88 | 13.80 | 14.19 | 14.24 |
| E5_80m | 30.71 | 18.47 | 18.63 | 18.66 | 1.55 | 1.52 | 1.59 | 1.59 | 15.75 | 13.70 | 14.07 | 14.11 |
| E5_90m | 30.44 | 18.44 | 18.59 | 18.62 | 1.53 | 1.50 | 1.57 | 1.58 | 15.63 | 13.63 | 13.97 | 14.01 |
| E5_100m | 30.21 | 18.41 | 18.56 | 18.59 | 1.51 | 1.49 | 1.55 | 1.56 | 15.54 | 13.56 | 13.88 | 13.93 |
| E5_110m | 30.01 | 18.39 | 18.54 | 18.56 | 1.50 | 1.48 | 1.54 | 1.55 | 15.46 | 13.50 | 13.81 | 13.85 |
| E5_120m | 29.84 | 18.37 | 18.51 | 18.54 | 1.49 | 1.47 | 1.53 | 1.53 | 15.39 | 13.45 | 13.75 | 13.79 |
| E5_130m | 29.69 | 18.36 | 18.49 | 18.52 | 1.48 | 1.46 | 1.52 | 1.52 | 15.33 | 13.41 | 13.70 | 13.73 |

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| Transect / Receptor | Total Annual Mean NOx ($\mu\text{g}/\text{m}^3$) | | | | Total Annual Mean NH ₃ ($\mu\text{g}/\text{m}^3$) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|--|-------|-------|-------|--|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E5_140m | 29.56 | 18.34 | 18.47 | 18.50 | 1.47 | 1.46 | 1.51 | 1.51 | 15.28 | 13.37 | 13.65 | 13.69 |
| E5_150m | 29.44 | 18.33 | 18.46 | 18.48 | 1.46 | 1.45 | 1.50 | 1.51 | 15.23 | 13.34 | 13.61 | 13.64 |
| E5_160m | 29.34 | 18.32 | 18.44 | 18.47 | 1.46 | 1.44 | 1.49 | 1.50 | 15.18 | 13.31 | 13.57 | 13.60 |
| E5_170m | 29.24 | 18.31 | 18.43 | 18.46 | 1.45 | 1.44 | 1.49 | 1.49 | 15.15 | 13.28 | 13.53 | 13.57 |
| E5_180m | 29.15 | 18.30 | 18.42 | 18.44 | 1.45 | 1.43 | 1.48 | 1.49 | 15.11 | 13.25 | 13.50 | 13.53 |
| E5_190m | 29.07 | 18.29 | 18.41 | 18.43 | 1.44 | 1.43 | 1.47 | 1.48 | 15.08 | 13.23 | 13.47 | 13.50 |
| E5_200m | 28.99 | 18.28 | 18.40 | 18.42 | 1.44 | 1.43 | 1.47 | 1.47 | 15.05 | 13.21 | 13.44 | 13.47 |
| E6_15.7m | 67.17 | 23.45 | 24.10 | 24.13 | 3.07 | 3.09 | 3.46 | 3.48 | 33.61 | 29.97 | 31.95 | 32.05 |
| E6_20m | 61.75 | 22.88 | 23.44 | 23.46 | 2.79 | 2.82 | 3.13 | 3.15 | 31.85 | 28.49 | 30.19 | 30.28 |
| E6_30m | 53.90 | 22.04 | 22.47 | 22.49 | 2.40 | 2.41 | 2.65 | 2.67 | 29.28 | 26.35 | 27.63 | 27.70 |
| E6_40m | 49.23 | 21.54 | 21.90 | 21.91 | 2.16 | 2.18 | 2.37 | 2.38 | 27.74 | 25.07 | 26.11 | 26.16 |
| E6_50m | 46.10 | 21.21 | 21.51 | 21.52 | 2.01 | 2.02 | 2.18 | 2.19 | 26.71 | 24.21 | 25.08 | 25.13 |
| E6_60m | 43.83 | 20.97 | 21.23 | 21.24 | 1.89 | 1.90 | 2.04 | 2.05 | 25.95 | 23.59 | 24.34 | 24.38 |
| E6_70m | 42.12 | 20.79 | 21.02 | 21.03 | 1.80 | 1.81 | 1.93 | 1.94 | 25.38 | 23.12 | 23.78 | 23.81 |
| E6_80m | 40.77 | 20.64 | 20.85 | 20.86 | 1.74 | 1.74 | 1.85 | 1.86 | 24.93 | 22.75 | 23.33 | 23.37 |
| E6_90m | 39.69 | 20.53 | 20.71 | 20.73 | 1.68 | 1.69 | 1.78 | 1.79 | 24.57 | 22.45 | 22.98 | 23.01 |
| E6_100m | 38.80 | 20.43 | 20.60 | 20.61 | 1.64 | 1.64 | 1.73 | 1.73 | 24.27 | 22.20 | 22.68 | 22.71 |
| E6_110m | 38.06 | 20.36 | 20.51 | 20.52 | 1.60 | 1.60 | 1.68 | 1.69 | 24.02 | 22.00 | 22.43 | 22.46 |
| E6_120m | 37.42 | 20.29 | 20.43 | 20.44 | 1.57 | 1.57 | 1.64 | 1.65 | 23.80 | 21.82 | 22.22 | 22.25 |
| E6_130m | 36.88 | 20.23 | 20.36 | 20.37 | 1.54 | 1.54 | 1.61 | 1.61 | 23.62 | 21.67 | 22.04 | 22.07 |
| E6_140m | 36.41 | 20.18 | 20.30 | 20.31 | 1.51 | 1.52 | 1.58 | 1.58 | 23.46 | 21.54 | 21.89 | 21.91 |
| E6_150m | 36.00 | 20.14 | 20.25 | 20.26 | 1.49 | 1.49 | 1.56 | 1.56 | 23.32 | 21.43 | 21.75 | 21.77 |
| E6_160m | 35.64 | 20.10 | 20.21 | 20.22 | 1.47 | 1.48 | 1.53 | 1.54 | 23.20 | 21.33 | 21.63 | 21.65 |

| Transect / Receptor | Total Annual Mean NOx (µg/m³) | | | | Total Annual Mean NH ₃ (µg/m³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|-------------------------------|-------|-------|-------|---|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E6_170m | 35.32 | 20.06 | 20.17 | 20.18 | 1.46 | 1.46 | 1.51 | 1.52 | 23.09 | 21.24 | 21.52 | 21.54 |
| E7_10.8m | 97.63 | 26.71 | 27.84 | 27.88 | 4.64 | 4.68 | 5.34 | 5.37 | 43.60 | 38.49 | 41.99 | 42.14 |
| E7_20m | 77.45 | 24.55 | 25.36 | 25.39 | 3.61 | 3.64 | 4.10 | 4.12 | 37.06 | 32.90 | 35.37 | 35.48 |
| E7_30m | 66.56 | 23.39 | 24.03 | 24.05 | 3.05 | 3.08 | 3.43 | 3.45 | 33.51 | 29.89 | 31.80 | 31.89 |
| E7_40m | 59.99 | 22.69 | 23.22 | 23.24 | 2.72 | 2.74 | 3.03 | 3.05 | 31.34 | 28.08 | 29.65 | 29.73 |
| E7_50m | 55.54 | 22.22 | 22.67 | 22.69 | 2.49 | 2.51 | 2.76 | 2.77 | 29.87 | 26.85 | 28.19 | 28.26 |
| E7_60m | 52.28 | 21.87 | 22.27 | 22.29 | 2.33 | 2.34 | 2.56 | 2.57 | 28.79 | 25.95 | 27.13 | 27.18 |
| E7_70m | 49.79 | 21.61 | 21.97 | 21.98 | 2.20 | 2.21 | 2.41 | 2.42 | 27.97 | 25.26 | 26.31 | 26.37 |
| E7_80m | 47.82 | 21.40 | 21.72 | 21.74 | 2.10 | 2.11 | 2.29 | 2.30 | 27.31 | 24.72 | 25.67 | 25.71 |
| E7_90m | 46.21 | 21.22 | 21.53 | 21.54 | 2.02 | 2.03 | 2.19 | 2.20 | 26.77 | 24.27 | 25.14 | 25.18 |
| E7_100m | 44.87 | 21.08 | 21.36 | 21.37 | 1.95 | 1.96 | 2.11 | 2.11 | 26.33 | 23.90 | 24.70 | 24.74 |
| E7_110m | 43.74 | 20.96 | 21.22 | 21.23 | 1.89 | 1.90 | 2.04 | 2.04 | 25.95 | 23.59 | 24.33 | 24.37 |
| E7_120m | 42.77 | 20.86 | 21.10 | 21.11 | 1.84 | 1.85 | 1.98 | 1.98 | 25.62 | 23.32 | 24.01 | 24.05 |
| E7_130m | 41.93 | 20.77 | 21.00 | 21.01 | 1.80 | 1.81 | 1.93 | 1.93 | 25.34 | 23.09 | 23.73 | 23.77 |
| E7_140m | 41.19 | 20.69 | 20.91 | 20.92 | 1.76 | 1.77 | 1.88 | 1.89 | 25.09 | 22.89 | 23.49 | 23.52 |
| E7_150m | 40.54 | 20.62 | 20.82 | 20.84 | 1.73 | 1.73 | 1.84 | 1.85 | 24.87 | 22.70 | 23.27 | 23.30 |
| E7_160m | 39.96 | 20.56 | 20.75 | 20.76 | 1.70 | 1.70 | 1.80 | 1.81 | 24.68 | 22.54 | 23.08 | 23.11 |
| E7_170m | 39.43 | 20.50 | 20.69 | 20.70 | 1.67 | 1.68 | 1.77 | 1.78 | 24.50 | 22.40 | 22.91 | 22.93 |
| E7_180m | 38.96 | 20.45 | 20.63 | 20.64 | 1.65 | 1.65 | 1.74 | 1.75 | 24.34 | 22.27 | 22.75 | 22.78 |
| E7_190m | 38.53 | 20.41 | 20.57 | 20.58 | 1.62 | 1.63 | 1.71 | 1.72 | 24.19 | 22.14 | 22.60 | 22.63 |
| E7_200m | 38.14 | 20.36 | 20.53 | 20.53 | 1.60 | 1.61 | 1.69 | 1.70 | 24.06 | 22.04 | 22.48 | 22.50 |
| E8_6.75m | 84.22 | 31.33 | 33.04 | 34.49 | 3.46 | 3.16 | 3.33 | 3.40 | 26.44 | 20.88 | 21.89 | 22.34 |
| E8_10m | 77.96 | 30.61 | 32.06 | 33.29 | 3.12 | 2.88 | 3.03 | 3.09 | 24.31 | 19.35 | 20.25 | 20.63 |

Page 645

| Transect / Receptor | Total Annual Mean NOx (µg/m³) | | | | Total Annual Mean NH ₃ (µg/m³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|-------------------------------|-------|-------|-------|---|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E8_20m | 67.69 | 29.41 | 30.43 | 31.26 | 2.58 | 2.43 | 2.55 | 2.59 | 20.85 | 16.91 | 17.63 | 17.87 |
| E8_30m | 62.69 | 28.82 | 29.62 | 30.25 | 2.33 | 2.21 | 2.32 | 2.35 | 19.19 | 15.74 | 16.37 | 16.56 |
| E8_40m | 59.66 | 28.47 | 29.12 | 29.62 | 2.17 | 2.08 | 2.18 | 2.20 | 18.19 | 15.04 | 15.62 | 15.77 |
| E8_50m | 57.60 | 28.23 | 28.79 | 29.20 | 2.07 | 1.99 | 2.09 | 2.11 | 17.51 | 14.57 | 15.11 | 15.24 |
| E8_60m | 56.11 | 28.05 | 28.54 | 28.89 | 1.99 | 1.93 | 2.02 | 2.04 | 17.02 | 14.23 | 14.74 | 14.85 |
| E8_70m | 54.97 | 27.91 | 28.36 | 28.66 | 1.94 | 1.88 | 1.97 | 1.98 | 16.65 | 13.97 | 14.45 | 14.56 |
| E8_80m | 54.06 | 27.81 | 28.21 | 28.47 | 1.89 | 1.84 | 1.93 | 1.94 | 16.35 | 13.76 | 14.23 | 14.32 |
| E8_90m | 53.31 | 27.72 | 28.09 | 28.32 | 1.85 | 1.81 | 1.89 | 1.91 | 16.10 | 13.58 | 14.04 | 14.13 |
| E8_100m | 52.69 | 27.64 | 27.99 | 28.20 | 1.82 | 1.78 | 1.86 | 1.88 | 15.90 | 13.44 | 13.88 | 13.96 |
| E8_110m | 52.15 | 27.58 | 27.90 | 28.09 | 1.80 | 1.76 | 1.84 | 1.85 | 15.72 | 13.32 | 13.75 | 13.82 |
| E8_120m | 51.69 | 27.53 | 27.82 | 28.00 | 1.77 | 1.74 | 1.82 | 1.83 | 15.57 | 13.21 | 13.63 | 13.70 |
| E8_130m | 51.28 | 27.48 | 27.76 | 27.92 | 1.75 | 1.72 | 1.80 | 1.81 | 15.44 | 13.11 | 13.53 | 13.59 |
| E8_140m | 50.92 | 27.44 | 27.70 | 27.85 | 1.73 | 1.71 | 1.78 | 1.79 | 15.32 | 13.03 | 13.43 | 13.49 |
| E8_150m | 50.59 | 27.40 | 27.65 | 27.79 | 1.72 | 1.69 | 1.76 | 1.77 | 15.21 | 12.95 | 13.35 | 13.41 |
| E8_160m | 50.29 | 27.36 | 27.60 | 27.73 | 1.70 | 1.68 | 1.75 | 1.76 | 15.12 | 12.88 | 13.27 | 13.33 |
| E8_170m | 50.02 | 27.33 | 27.56 | 27.68 | 1.69 | 1.67 | 1.74 | 1.75 | 15.03 | 12.82 | 13.20 | 13.25 |
| E8_180m | 49.77 | 27.30 | 27.52 | 27.64 | 1.68 | 1.66 | 1.73 | 1.73 | 14.95 | 12.76 | 13.13 | 13.18 |
| E8_190m | 49.54 | 27.27 | 27.49 | 27.59 | 1.67 | 1.65 | 1.71 | 1.72 | 14.87 | 12.70 | 13.07 | 13.12 |
| E8_200m | 49.32 | 27.25 | 27.45 | 27.55 | 1.65 | 1.64 | 1.70 | 1.71 | 14.80 | 12.65 | 13.01 | 13.06 |
| E9_8.05m | 76.08 | 30.46 | 32.20 | 33.71 | 2.90 | 2.69 | 2.84 | 2.88 | 23.04 | 18.38 | 19.25 | 19.58 |
| E9_10m | 73.02 | 30.09 | 31.62 | 32.94 | 2.77 | 2.58 | 2.72 | 2.75 | 22.14 | 17.76 | 18.57 | 18.87 |
| E9_20m | 64.39 | 29.05 | 30.02 | 30.82 | 2.37 | 2.25 | 2.37 | 2.39 | 19.54 | 15.98 | 16.65 | 16.84 |
| E9_30m | 60.42 | 28.57 | 29.30 | 29.87 | 2.19 | 2.10 | 2.20 | 2.23 | 18.31 | 15.14 | 15.75 | 15.90 |

| Transect / Receptor | Total Annual Mean NOx (µg/m³) | | | | Total Annual Mean NH ₃ (µg/m³) | | | | Total Annual Mean N Dep (kgN/ha/yr) | | | |
|------------------------|-------------------------------|-------|-------|-------|---|------|------|------|-------------------------------------|-------|-------|-------|
| | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 | 2019 | 2041 | 2041 | 2041 |
| | Base | FB | DM | DS | Base | FB | DM | DS | Base | FB | DM | DS |
| E9_40m | 58.14 | 28.30 | 28.89 | 29.32 | 2.08 | 2.01 | 2.11 | 2.13 | 17.60 | 14.66 | 15.23 | 15.36 |
| E9_50m | 56.67 | 28.12 | 28.63 | 28.98 | 2.01 | 1.95 | 2.05 | 2.07 | 17.14 | 14.35 | 14.90 | 15.01 |
| E9_60m | 55.66 | 28.00 | 28.44 | 28.74 | 1.96 | 1.91 | 2.01 | 2.02 | 16.82 | 14.14 | 14.67 | 14.77 |
| E9_70m | 54.94 | 27.91 | 28.31 | 28.56 | 1.93 | 1.88 | 1.98 | 1.99 | 16.59 | 13.98 | 14.51 | 14.61 |
| E9_80m | 54.40 | 27.84 | 28.21 | 28.43 | 1.90 | 1.86 | 1.96 | 1.97 | 16.42 | 13.87 | 14.40 | 14.48 |
| E9_90m | 54.00 | 27.79 | 28.14 | 28.33 | 1.88 | 1.85 | 1.94 | 1.96 | 16.30 | 13.79 | 14.32 | 14.40 |
| E9_100m | 53.70 | 27.75 | 28.08 | 28.25 | 1.87 | 1.84 | 1.93 | 1.95 | 16.20 | 13.73 | 14.26 | 14.33 |
| E9_110m | 53.47 | 27.72 | 28.04 | 28.19 | 1.86 | 1.83 | 1.93 | 1.94 | 16.13 | 13.69 | 14.22 | 14.29 |
| E9_120m | 53.30 | 27.70 | 28.00 | 28.14 | 1.85 | 1.83 | 1.92 | 1.93 | 16.08 | 13.66 | 14.19 | 14.26 |
| E9_130m | 53.18 | 27.68 | 27.98 | 28.11 | 1.84 | 1.82 | 1.92 | 1.93 | 16.04 | 13.64 | 14.17 | 14.24 |
| E9_140m | 53.10 | 27.67 | 27.96 | 28.08 | 1.84 | 1.82 | 1.92 | 1.93 | 16.02 | 13.63 | 14.17 | 14.23 |
| E9_150m | 53.06 | 27.66 | 27.94 | 28.06 | 1.84 | 1.82 | 1.92 | 1.93 | 16.00 | 13.63 | 14.17 | 14.23 |
| E9_160m | 53.04 | 27.66 | 27.93 | 28.04 | 1.84 | 1.82 | 1.92 | 1.93 | 16.00 | 13.64 | 14.18 | 14.24 |
| E9_170m | 53.04 | 27.66 | 27.93 | 28.03 | 1.84 | 1.82 | 1.92 | 1.93 | 16.00 | 13.65 | 14.19 | 14.25 |
| E9_180m | 53.07 | 27.66 | 27.93 | 28.02 | 1.84 | 1.83 | 1.93 | 1.94 | 16.01 | 13.66 | 14.21 | 14.28 |
| E9_190m | 53.11 | 27.66 | 27.93 | 28.02 | 1.84 | 1.83 | 1.93 | 1.94 | 16.03 | 13.68 | 14.24 | 14.30 |
| E9_200m | 53.18 | 27.66 | 27.93 | 28.02 | 1.84 | 1.83 | 1.94 | 1.95 | 16.05 | 13.71 | 14.27 | 14.33 |

Appendix E Air quality modelling methodology

Portsmouth City Council- Air Quality Modelling

Portsmouth Local Plan

Project number: 60586784

February 2024

Quality information

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Revision History

| Revision | Revision date | Details | Authorized | Name | Position |
|----------|---------------|---------|------------|-------------|--------------------|
| 1 | 15/2/24 | Draft | AS | Anna Savage | Technical Director |
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1. Introduction

- 1.1 Portsmouth City Council (PCC) is preparing a Draft Local Plan 2041 which represents a full review of the adopted Local Plan. Once the Local Plan has been through a number of statutory stages of preparation, it will be examined and if found to be sound, it can be adopted. Upon adoption it will replace the current Portsmouth Plan (Revised Local Plan 2012-2027). The Council has commissioned AECOM Limited to conduct an air quality assessment to inform the Habitats Regulations Assessment (HRA) of the Regulation 18 Stage 2 preparation of the Local Plan 2041 and to form part of the evidence base.
- 1.2 The work presented in this report is to be used to inform the Appropriate Assessment of the HRA. It focuses on the impact of traffic related emissions due to planned development during the Local Plan period on sensitive ecosystems within the:
- Solent Maritime Special Area of Conservation (SAC);
 - Portsmouth, Chichester and Langstone Harbour Special Protection Areas (SPAs);
 - Portsmouth, Chichester and Langstone Harbour wetlands of international importance (RAMSAR); and
 - Portsmouth and Langstone Harbour Sites of Special Scientific Interest (SSSIs).
- 1.3 The Ecological sites are mainly designated for their importance for bird species, consisting of a range of wetlands and mudflats which are potentially sensitive to nitrogen and acid deposition due to several reasons, such as soil acidification and toxicity to species (Natural England, 2018). More specifically, in terms of nitrogen sensitive habitats, the Solent Maritime SAC contains salt meadows, coastal dunes, mudflats and sandflats. Special Protection Areas (SPAs) are designated for the conservation of wild birds. They are classified for rare and vulnerable species of birds and for regularly occurring migratory species. It should be noted that many of the identified ecological sites overlap substantially and that some areas are designated with two or three different forms of protection.
- 1.4 This assessment considers the following four key pollutants shown to affect sensitive ecosystems: ammonia (NH₃), oxides of nitrogen (NO_x), total nitrogen (N) deposition and total acid deposition. All pollutants are considered at receptor points, within transects, up to 200m of the roadside, within each of the ecological sites considered in the assessment.
- 1.5 The main aims of this study are to:
- Identify potentially sensitive ecological receptor locations within the ecological sites, within 200m of roads that are expected to be affected by the Local Plan 2041;
 - Predict annual mean NO_x and NH₃ concentrations and nitrogen and acid deposition rates for the following scenarios at selected ecological receptors;
 - Baseline year (2019): represents air quality in a recent past year (2019);
 - Future Baseline (2041): uses the traffic data from the 'current baseline' in 2019, but applies future assessment year vehicle emission factors and background pollutant concentrations to allow for the 'in combination' assessment required for the HRA;
 - 2041 'Do Minimum' (DM) Reference Case: future assessment year, which does not include the influence of planned development from the Local Plan 2041, but does allow for strategic planned development in neighbouring local authorities;
 - 2041 'Do Something' (DS) Scenario: future assessment year, which includes the influence of planned development from the Portsmouth City Council Local Plan 2041, using the growth scenario from the Transport Assessment and from strategic planned development in neighbouring local authorities.
 - Determine if there are any exceedances of NO_x and NH₃ critical levels, and nitrogen and acid deposition critical loads within the three ecological habitat sites.

- 1.6 The results and implications of the modelling outputs are presented in the accompanying report 'Habitats Regulations Assessment (HRA) of the Portsmouth City Council Plan Review'. More detail on the Transport Assessment and associated modelling are available separately.

2. Policy Context

Clean Air Strategy

- 2.1 In 2019, the UK government released its Clean Air Strategy 2019 (Defra, 2019) as part of its 25 Year Environment Plan (Defra, 2018). These documents include targets to reduce emissions of ammonia from farming activities, and nitrogen oxides from combustion processes, and thus reduce the deposition of nitrogen to sensitive ecosystems.

Environment Act

- 2.2 The Environment Act 2021 (HM Government, 2021) amends the Environment Act 1995 (HM Government, 1995). On 9th November 2021, the Act received Royal Assent after being first introduced to Parliament in January 2020 to address environmental protection and the delivery of the Government's 25 Year Environment Plan. It includes provisions to establish a set of statutory environmental principles to ensure environmental governance through an environmental watchdog, the Office for Environmental Protection (OEP).
- 2.3 The Secretary of State must publish a review report every five years (as a minimum and with yearly updates to Parliament). The 25 Year Environment Plan has been adopted as the first Environmental Improvement Plan (EIP) of the Environment Act 2021, with long-term legally binding targets being finalised by Defra¹. The EIP 2023 was published in January 2023 (updated February 2023), building on the 25 Year Environment Plan, and setting out how the delivery of environmental goals will be coordinated with landowners, communities and businesses.

Habitats Regulations Assessment

- 2.4 While the UK is no longer a member of the EU, a requirement for HRA will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- 2.5 The HRA process applies the 'Precautionary Principle'² to European sites³. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question.
- 2.6 Following evidence gathering, the first stage of any HRA is the screening for Likely Significant Effects (LSEs), a high-level assessment to decide whether the Appropriate Assessment is required. Where it is determined that a conclusion of 'no Likely Significant Effects' cannot be drawn, the analysis proceeds to the Appropriate Assessment.

Other Guidance documents

- 2.7 Best practice and advice / guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2020), the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2021) and National Highways (Design Manual for Roads and Bridges DMRB LA105) (DMRB, 2019) have been used to determine the methodology applied, and in the accompanying ecological interpretation of the results.

¹ <https://www.gov.uk/government/news/update-on-progress-on-environmental-targets>

² The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".

³ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> - "A European site is protected by the Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations)". These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites (wetlands of international importance).

Critical Levels

- 2.8 Annual mean critical levels of NO_x and NH₃ are summarised in Table 1. These are concentrations above which adverse effects on ecosystems may occur based on present knowledge. The critical level for NO_x is taken from the EU Ambient Air Quality Directive 2008/50/EU (EU Directives, 2008) which has also been set as the Air Quality Strategy objective for the protection of vegetation and ecosystems and has been incorporated into English legislation.
- 2.9 The EU Directive (EU Directives, 2008) states that the sampling point to determine compliance should be sited more than 20 km away from agglomerations or more than 5 km away from other built-up areas, industrial installations or motorways or major roads with traffic counts of more than 50,000 vehicles per day, which means that a sampling point must be sited in such a way that is representative of an area of at least 1,000 km². Applying the critical level for NO_x to designated nature conservation sites that are located close to busy roads is therefore precautionary.
- 2.10 The critical levels for NH₃ have not been incorporated into legislation and are a recommendation made by the United Nations Economic Commission for Europe (UNECE) Executive Body for the Convention on Long-Range Transboundary Air Pollution (CLRTAP) (UNECE, 2013).

Table 1: Annual Mean Critical Levels (NO_x and NH₃)

| Pollutant | Critical Level |
|---------------------------------------|--|
| Oxides of nitrogen (NO _x) | 30 µg/m ³ |
| Ammonia (NH ₃) | 3 µg/m ³ for higher plants |
| | 1 µg/m ³ for lichens and bryophytes |

3. Methodology

- 3.1 The Local Plan will significantly increase the population and employment opportunities within the city which may result in more commuter journeys being undertaken within 200m of sensitive ecological sites. Therefore, LSEs cannot be excluded, and four European sites are screened in for Appropriate Assessment regarding this impact pathway. This is in accordance with Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018). In addition, a number of SSSIs have been considered in order to take a precautionary approach.
- 3.2 As such, the air quality modelling methodology and analyses presented in this report have been undertaken to inform the HRA for the ecological sites, set out in paragraph 1.2. These ecological sites have been considered in the assessment as they contain habitats and species that are sensitive to air quality or deposition impacts with more information provided in the introduction section.
- 3.3 The following sections outline the methodology used to model air quality in the ecological sites as listed above, affected by changes to traffic associated with the Portsmouth Local Plan 2041. The following sources of information and data have been used to form the basis of the air quality assessment:
- Department for Environment, Food and Rural Affairs' (Defra) Air Quality Background Concentration Maps based on a 2018 base year (Defra, 2020a);
 - Defra's Vehicle Emission Factors (Defra, 2020b);
 - Emission rates as published in the Calculator for Road Emissions of Ammonia (CREAM) tool (Air Quality Consultants, 2020);
 - 1x1 km modelled nitrogen and acid deposition data and ammonia background concentrations from the Air Pollution Information System (APIS, 2022);
 - Traffic count and speed data used to inform the Transport Assessment for 2019 and 2041.
- 3.4 The modelling assessment was conducted following methodology within Defra's Local Air Quality Management Technical Guidance (LAQM.TG(22)) (Defra, 2022), and guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2020) and the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2021).

Pollutants of Interest

- 3.5 The pollutants of interest with regard to sensitive ecosystems for which critical levels and critical loads exist, and which are included in the air quality modelling and assessment of impacts on the ecological sites listed above, are NO_x, NH₃, and nitrogen and acid deposition. Modelling of these pollutants is undertaken to assess the air quality impacts of planned development in the Local Plan on the ecological sites alone, and 'in combination' with existing plans within surrounding authorities.
- 3.6 Whilst emissions of NO_x from road vehicles are regulated according to Euro standards, emissions of NH₃ are not. This means that emissions of NH₃ from individual vehicle types are highly uncertain, particularly as measurements are rarely made (as this is not required for regulatory purposes). The uncertainty associated with the predicted nitrogen deposition rates from NH₃ is also greater than for NO₂, with the NH₃ derived nitrogen deposition rates representing an upper estimate.
- 3.7 There is currently no tool publicly available for the assessment of road traffic emissions of NH₃ from National Highways, Defra, Natural England, or other nature conservation bodies. However, there is evidence that exclusion of NH₃ from assessments leads to an underestimate of deposited nitrogen (Air Quality Consultants, 2020).
- 3.8 The methodology used to model NH₃ concentrations from road traffic, using ADMS Roads, and the subsequent contribution to nitrogen deposition within the ecological sites (described below), is considered the most appropriate that is available at this time. The methodology has been applied by AECOM in

several Appropriate Assessments to inform HRA including that for Tunbridge Wells Borough Council, Epping Forest, Wealden and Mid Sussex District Councils.

Nitrogen Oxides

- 3.9 Detailed dispersion modelling of road traffic emissions of NO_x has been undertaken using the latest version of ADMS Roads (currently v5), combined with the latest version – at the time of assessment – of Defra’s Emissions Factor Toolkit (EFT v12.0.1). Although vehicle emission factors are now available for 2031 - 2050, it should be noted that improvements in vehicle emission factors may not be fully accounted for, e.g. the introduction of Euro 7 engine standard anticipated to be around 2025, and the ban on the sale of new petrol and diesel cars and vans in 2035.

Ammonia

- 3.10 In February 2020, Air Quality Consultants developed and published the Calculator for Road Emissions of Ammonia (CREAM) tool, ‘*in order to allow tentative predictions regarding trends in traffic-related ammonia emissions over time*’. The tool is based upon remotely sensed pollutant measurements, published real-world fuel consumption data, and ambient measurements of ammonia recorded in Ashdown Forest (2014-2016).

- 3.11 The report that was published alongside the CREAM tool states that:

“It should be recognised that these emissions factors remain uncertain. Using them to make future year predictions will clearly be an improvement on any assessment which omits ammonia. They are also considered to be more robust than the emissions factors contained in the EEA Guidebook, which risk significantly under-predicting ammonia emissions. The emissions factors contained in the CREAM model can be considered to provide the most robust estimate of traffic-related ammonia possible at the present time, but they may be updated in the future as more information becomes available.”

- 3.12 The CREAM tool currently uses vehicle fleet information from Defra’s EFT v9 which has now been superseded. AECOM has therefore applied the ammonia emission factors, as derived by Air Quality Consultants and in the current version of CREAM, with the average vehicle fleet on rural roads from EFT v12.0.1 to estimate emissions.
- 3.13 The latest version of ADMS Roads (v5) has been employed to model the dispersion of emissions of NH₃ from road traffic, consistent with the approach for modelling emissions of NO_x.

Traffic Data

- 3.14 The traffic data used for this assessment is based on the modelling undertaken for the Transport Assessment for 1 growth scenario. The traffic data were provided for a series of road links within 200m of the ecological sites considered. These links were chosen as they are located on the busiest roads in the area that are expected to experience the greatest increase in flows over the Local Plan period. As such, these are the roads where an air quality effect due to additional traffic growth is most likely to be observed. The modelled road links in each of the ecological sites are shown in Figures A1 and A2.
- 3.15 Traffic data were provided for each of the road links, in the form of 24-hour Annual Average Daily Traffic (AADT) flows, with percentage heavy duty vehicle (HDV) flows and average speed for four scenarios – 2019 baseline (also used for the future baseline), future year ‘Do Minimum’ (or ‘Reference Case’), and two future year ‘Do Something’ Scenarios. A summary of the traffic data used in the air quality assessment is given in Appendix 1.

Modelled Vehicle Fleet

- 3.16 Automatic Number Plate Recognition (ANPR) data from 2023 was used to obtain an estimate of the current local vehicle fleet. Data was obtained from three local traffic monitoring sites over two full days (48 hours in total, one weekend and one weekday). This data was used within the EFT’s fleet projection tool to project the 2023 Euro engine classifications of the default fleet backwards to the base scenario year (2019), and also forwards to the future scenario year (2041). These projected fleets were then used in EFT v12.0.1 with the default basic split fleet projections.

Receptors

- 3.17 Pollutant concentrations and deposition rates have been predicted along defined transects within the ecological sites, within 200m of affected roads, in accordance with National Highways guidance for ecological assessments (LA105) (DMRB, 2019) and Natural England guidance (Natural England, 2018). The greatest impacts from changes in road traffic emissions will be observed and modelled closest to the roadside. Consideration of the road network within 200m of the ecological sites is therefore considered robust as background concentrations utilised in the assessment will account for all other sources that are not defined explicitly in the model.
- 3.18 The locations of the ecological transects relevant to this project were agreed with PCC and other stakeholders. The transects are situated at key locations where the greatest impacts upon each of the ecological sites assessed are likely to occur.
- 3.19 For each SAC, the receptors are situated at the closest point to the road within the SAC, and spaced every 10m within the transects, up to 200m from the roadside. All receptors are modelled at ground level (0m height).
- 3.20 The greatest impacts will generally occur where both the greatest change in traffic flows is expected and the habitats lie closest to the road. This information has been used to select transect locations. The usual approach is to place a transect on a modelled link (sometimes having a transect either side of the road to account for differences in the dispersion of emissions due to meteorology), with each link being defined as a stretch of road between changes in emissions i.e. where there are changes in traffic flows and/or speeds.

Model Setup

- 3.21 Detailed dispersion modelling was undertaken using the current version of ADMS-Roads (v5) to model concentrations of NO_x and NH₃ using the parameters in Table 2 for the following scenarios:
- 2019 Baseline – 2019 AADT, 2019 emission factors and 2019 “Basic Split” fleet using the backward-projected Euro engine classifications from the 2023 ANPR data, and 2019 background concentrations.
 - 2041 Future Baseline – 2019 AADT, 2030 emission factors (latest available year), 2041 projected vehicle fleet using the forward-projected Euro engine classifications from the 2023 ANPR data, and 2030 background concentrations (the latest projected year available from Defra);
 - 2041 Do Minimum – 2041 AADT without Local Plan but with all committed development, 2030 emission factors, 2041 projected vehicle fleet using the forward-projected Euro engine classifications from the 2023 ANPR data, and 2030 background concentrations; and
 - 2041 Do Something – 2041 AADT with Local Plan, 2030 emission factors, 2041 projected vehicle fleet using the forward-projected Euro engine classifications from the 2023 ANPR data, and 2030 background concentrations.
- 3.22 A baseline year was modelled to provide a means of model verification – for this assessment, 2019 traffic data were provided for the modelled baseline. To support the assessment of the potential impact of the planned development in the Local Plan scenarios, a ‘future baseline’ and future year ‘do minimum’ scenario were modelled. The ‘do minimum’ scenario includes the influence of development in neighbouring local authorities, whereas the ‘future baseline’ does not.
- 3.23 The future baseline is a hypothetical scenario as it applies improvements in vehicle emissions standards to the baseline vehicle fleet without allowing for any traffic growth. However, such an approach enables the ‘in combination’ effect of development and traffic growth to be seen unobscured by improvements in emissions technology / performance.
- 3.24 The difference between the ‘do something’ and the ‘do minimum’ scenarios provide the impact of the planned development within the Local Plan, alone. The difference between the ‘do something’ and the ‘future baseline’ scenarios provides a thorough and precautionary assessment of the impact of the

planned development within the Local Plan ‘in combination’, as the ‘future baseline’ accounts for no future growth.

Table 2: General ADMS-Roads Model Conditions

| Variables | ADMS-Roads Model Input |
|--|--|
| Surface roughness at source | 0.5m |
| Surface roughness at Meteorological Site | 0.2m |
| Minimum Monin-Obukhov length for stable conditions | 30m |
| Terrain types | Flat |
| Receptor location | x, y coordinates determined by GIS, z = 0m for ecological receptors. |
| Emissions | NO _x – Defra’s EFT v12.0.1 NH ₃ – CREAM V1A |
| Meteorological data | 1 year (2019) hourly sequential data from Thorney Island meteorological station. |
| Receptors | Ecological transects |
| Model output | Long-term (annual) mean NO _x and NH ₃ concentrations. |

Plume Depletion

- 3.25 Plume depletion due to dry deposition onto vegetation was taken into account in the model. This was enabled by using the ADMS-Roads ‘Dry Deposition’ module, applying the ‘grassland’ deposition rates presented in the Air Quality Technical Advisory Group (AQTAG) deposition velocities that are cited in 2020 IAQM guidance (IAQM, 2020), as shown in Table 3.
- 3.26 The deposition velocity for NO₂ was applied to raw modelled NO_x. This assumes that 100% of NO_x is emitted as NO₂, and therefore represents an optimistic depletion of NO_x from the atmosphere.

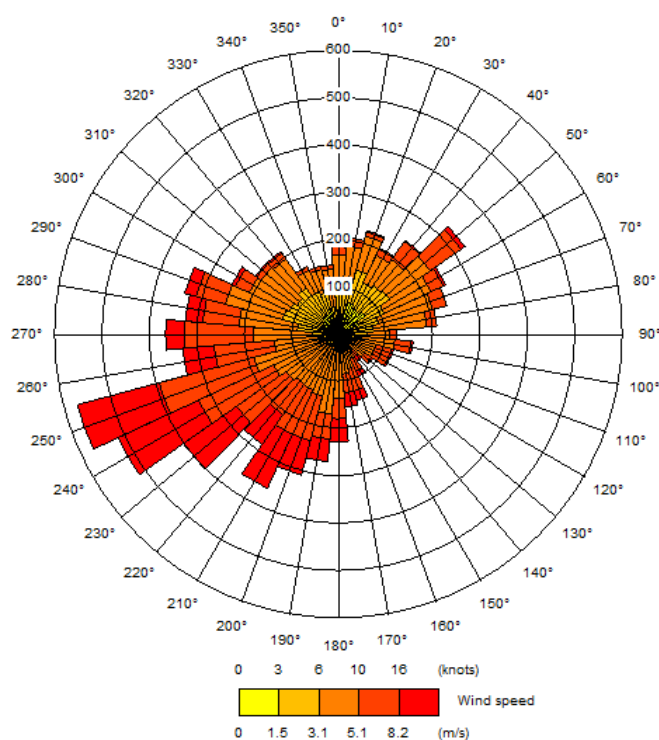
Table 3: Nitrogen Deposition Velocities and Conversion Rates

| Pollutant | Habitat | Nitrogen deposition conversion rates | Deposition velocity |
|-----------------|------------------------------|--|---------------------|
| NO ₂ | Grassland / short vegetation | 1 µg/m ³ NO ₂ = 0.14 kgN/ha/yr | 0.0015 m/s |
| NH ₃ | Grassland / short vegetation | 1 µg/m ³ NH ₃ = 5.2 kgN/ha/yr | 0.020 m/s |

Meteorological Data

- 3.27 One year (2019) of hourly sequential observation data from Thorney Island meteorological station has been used in this assessment to correspond with the baseline traffic data and emission factors. The station is located in a rural setting approximately 3.5 km South of the A27 near Emsworth, along which three of the twelve transects considered in the study are located, and experiences meteorological conditions that are representative of those experienced within the overall air quality study area. In particular, it is noted that the meteorological site experiences a similar level of coastal effects as the ecological sites which is important as this can have a profound effect on dispersion.
- 3.28 Figure 1 shows that the dominant direction of wind was from the south-west, as is typical for the UK.

Figure 1: Wind Rose, Thorney Island Meteorological Data, 2019



Background Data

- 3.29 Background concentrations of nitrogen dioxide (NO₂) and NO_x for 2019 and 2030 were sourced from Defra’s 2018-based 1x1km background maps in the study area (Defra, 2020a).
- 3.30 Contributions from explicitly modelled source sectors were removed from the NO₂ and NO_x background concentrations, as outlined in Table 4, in accordance with Defra guidance (Defra, 2022). The data presented in Table 4 show that the concentrations are predicted to decrease between 2019 and 2030.
- 3.31 The NH₃ background concentrations from APIS are presented in Table 5.

Table 4: Defra Mapped Background Pollutant Concentrations

| Transects | Road Name | Grid Square (X, Y) | Annual Mean Concentrations (µg/m ³) | | | |
|-----------|-----------|----------------------|---|----------------------|----------------------|----------------------|
| | | | 2019 NO ₂ | 2019 NO _x | 2030 NO ₂ | 2030 NO _x |
| T1 | M275 | 464233 103579 | 20.8 | 30.0 | 14.1 | 19.3 |
| T2 | M275 | 464003 102705 | 23.8 | 35.8 | 17.3 | 24.8 |
| T3 | M275 | 464204 103589 | 20.8 | 30.0 | 14.1 | 19.3 |
| T4 | M275 | 464670 104307 | 31.9 | 50.5 | 19.8 | 28.7 |

| Transects | Road Name | Grid Square (X, Y) | Annual Mean Concentrations ($\mu\text{g}/\text{m}^3$) | | | |
|-----------|-----------|-----------------------|---|----------------------|----------------------|----------------------|
| | | | 2019 NO ₂ | 2019 NO _x | 2030 NO ₂ | 2030 NO _x |
| T5 | A27 | 462840 105636 | 17.8 | 25.3 | 13.7 | 17.9 |
| T6 | A27 | 468812 105203 | 21.0 | 30.3 | 14.2 | 19.5 |
| T7 | A27 | 429500, 113500 | 21.0 | 30.3 | 14.2 | 19.5 |
| T8 | A2030 | 467422 104083 | 26.8 | 41.1 | 18.3 | 26.3 |
| T9 | A2030 | 467394 104084 | 26.8 | 41.1 | 18.3 | 26.3 |

Note: Sectors removed as emissions included in detailed dispersion modelling: Motorway (in of 1x1km grid square) and Trunk A road (in of 1x1km grid square)

Ecological Data

- 3.32 APIS provides 'a searchable database and information on pollutants and their impacts on habitats and species'. For the ecological sites assessed, data for the appropriate habitat have been applied for each receptor along each transect in the study. Data applicable to short vegetation or grassland was used for all of the ecological sites assessed. This includes critical loads of nitrogen and the average nitrogen and acid deposition rates to the habitat, as presented in Table 5.
- 3.33 Background concentrations of ammonia were also sourced from 5x5 km modelled maps available from APIS, whereas background concentrations of NO_x and NO₂ were sourced from Defra's latest 1x1 km maps, thereby accounting for all sources that are not explicitly defined in the model.
- 3.34 While scrub and other shrubs are likely to be present within some of the ecological sites assessed, they are not of ecological significance in relation to these habitats. The deposition velocity to short vegetation is applicable where such shrubs are interspersed as part of the habitat.
- 3.35 In order to create a robust and scientifically agreed projection for background nitrogen deposition trends in the UK, even allowing for growth, the Joint Nature Conservation Committee (JNCC) commissioned the Nitrogen Futures project, which reported in 2020 (JNCC, 2020). The JNCC Nitrogen Futures project investigated whether a net improvement in nitrogen deposition (including expected development over the same period) was expected to occur to 2030 under a range of scenarios ranging from the most cautious scenario (Business As Usual, BAU, reflecting simply existing emission reduction commitments /measures already in place) to much more ambitious scenarios that would require varying amounts of additional, currently uncommitted, measures from the UK government and devolved administrations.
- 3.36 The report concluded that *'The scenario modelling predicts a substantial decrease in risk of impacts on sensitive vegetation by 2030, under the most likely future baseline [a scenario called '2030 NAPCP+DA (NECR NO_x)']*. This is estimated to achieve the UK Government's Clean Air Strategy (CAS) target for England, defined as a 17% decrease in total reactive N deposition onto protected priority sensitive habitats, with a predicted 18.9% decrease [for England] from a 2016 base year'. The report predicted a fall in nitrogen deposition by 2030 under every modelled scenario, including the most cautious (2030 BAU). For the BAU scenario nitrogen deposition was forecast to decrease between 2017 and 2030 from 277.1 kt N to 239.5 kt N (i.e. a reduction of 37.6 kt N).

- 3.37 No other changes to the APIS data have been made from those presented (3-year average, 2019-21) for any modelled scenario.
- 3.38 Not to make *any* allowance for improvements in emission factors or background concentrations would result in increased emissions and hence concentrations over the plan period as an increased number of vehicles is expected on the roads. This is not expected to occur as can be seen from previous long-term trends in the UK, which show improvements over extended periods, not worsening. Historical records (e.g., Defra monitoring trends) show that as increased vehicles enter the fleet that these increases are offset by the improvements in the emissions of the newer vehicles and the removal of older vehicles.
- 3.39 In 2018 the Court of Justice of the European Union (CJEU) ruled in cases C-293/17 and C-294/17 (often dubbed the Dutch Nitrogen cases). One aspect of that ruling concerned the extent to which autonomous measures (i.e., improvements in baseline nitrogen deposition that are not attributable to the Local Plan) can be taken into account in appropriate assessment, the CJEU ruled that it was legally compliant to take such autonomous measures into account provided the benefits were not ‘uncertain’ (paragraphs 130&132). Note that previous case law on the interpretation of the Habitats Directive has clarified that ‘certain’ does not mean absolute certainty but ‘*where no reasonable scientific doubt remains*’⁴ [emphasis added].
- 3.40 The forecasts for improvements in NO_x emission factors, background concentrations and background deposition rates used in this report are considered to be realistic and have the requisite level of certainty. This is because a) data are used and to a large extent they build upon established historic trends in NO_x and oxidised nitrogen deposition and b) for total nitrogen deposition they are based on a cautious use of evidenced central government forecasts associated with uptake of technology that has either already been introduced or is widely expected within the professional community to be introduced and effective before 2030, as illustrated in the Nitrogen Futures project.
- 3.41 When it comes to forecasting the NO_x emissions of additional traffic, it would overestimate those emissions to assume that by 2041 the emission factors will be no different to those in 2019; to make such an assumption would be to fail to take account of the expected continued uptake of Euro 6 compliant vehicles between 2019 and 2041 and would assume (putting it simply) that no motorists would replace their cars during the entire plan period. For example, the latest (Euro 6/VI) emissions standard only became mandatory in 2014 (for heavy duty vehicles) and 2015 (for cars) and the effects will not therefore be visible in the data available from APIS because relatively few people will have been driving vehicles compliant with that standard as early as 2019. Far more drivers can be expected to be using Euro 6 compliant vehicles by the end of the Local Plan period.
- 3.42 The vehicle emission factors within the air quality modelling tools available only project out to 2030 and so the 2041 assessment year does not recognise continued uptake of more stringent emissions standards. Therefore, the results are likely to be cautious in terms of emissions related to vehicle age.

Table 5: APIS Data for Ecological Transects for 2019-2021

| Transect | Av. N Dep kgN/ha/yr [§] | Critical Load N Dep kgN/ha/yr | Total Av. Acid Dep keq/ha/yr N [§] | Critical Load N Acid Dep keq/ha/yr | Background NH ₃ (µg/m ³) |
|----------|-------------------------------------|----------------------------------|---|---------------------------------------|--|
| | | | | MaxCLMinN- MaxCLMaxN | |
| E1 | 12.52 | 10 - 20 | 1.01 | 1.071-5.071 | 1.29 |
| E2 | 12.16 | 10 - 20 | 0.98 | 1.071-5.071 | 1.32 |
| E3 | 12.52 | 10 - 20 | 1.01 | 1.071-5.071 | 1.29 |
| E4 | 12.88 | 10 - 20 | 1.04 | 1.071-5.071 | 1.26 |
| E5 | 13.70 | 10 - 20 | 1.12 | 1.071-5.071 | 1.23 |

⁴ Case C-239/04 Commission v Portugal [2006] ECR 10183, para. 24; Holohan et al vs. An Bord Pleanála (C-461/17), para. 33

| Transect | Av. N Dep kgN/ha/yr ^s | Critical Load N Dep kgN/ha/yr | Total Av. Acid Dep keq/ha/yr N ^s | Critical Load N Acid Dep keq/ha/yr | Background NH ₃ (µg/m ³) |
|----------|-------------------------------------|----------------------------------|---|---------------------------------------|--|
| | | | | MaxCLMinN- MaxCLMaxN | |
| E6 | 21.39 | 5 - 10 | 0.97 | 1.071-5.071 | 1.20 |
| E7 | 21.39 | 5 - 10 | 0.97 | 1.071-5.071 | 1.20 |
| E8 | 12.06 | 5 - 10 | 0.94 | 1.071-5.071 | 1.24 |
| E9 | 12.06 | 5 - 10 | 0.94 | 1.071-5.071 | 1.24 |

Verification

- 3.43 Model verification is the process by which the performance of the model is assessed to identify any discrepancies between modelled and measured concentrations at air quality monitoring sites within the study area.
- 3.44 Modelled predictions were made for annual mean NO₂ concentrations at monitoring locations in order to compare monitored and modelled pollutant concentrations. The comparison of model outputs was made against 2019 monitoring data so as to correspond with the baseline year of assessment. No NH₃ monitoring locations were available and so a standard model adjustment factor of 1.0 was used to adjust the modelled NH₃ concentrations. Following detailed analysis of each monitoring location in the study area, a total of 9 roadside monitoring sites were taken forward in the NO₂ model verification process.
- 3.45 The calculated verification factor was found to be less than 1.0, which is likely to be due to the impact of open coastal meteorological impacts affecting (increasing) pollutant dispersion at the selected monitoring locations. Therefore, a worst case approach has been considered and a verification factor of 1.0 has been used for NO₂ concentrations, and this factor has additionally been applied to modelled NH₃ concentrations.

Deposition velocities

- 3.46 Deposited nitrogen from road traffic derived NH₃ and NO₂ was estimated using the deposition velocities presented in Table 3. The conversion rates were applied to the final modelled NO₂ and NH₃ concentrations from road traffic, to provide kgN/ha/year. All of the transects across the ecological habitats were modelled and analysed as heathland / grassland i.e. 'short vegetation' was used at all locations.

Appendix A Traffic Data

| Transect | Link_Ref | Base 2019 | | | DN 2041 | | | With LP 2041 | | | AADT Comparisons | |
|----------|-------------|-----------|-------|-------|---------|------|-------|--------------|------|-------|------------------|-------------|
| | | AADT | HGV% | Speed | AADT | HGV% | Speed | AADT | HGV% | Speed | Baseline Growth | 2041 Change |
| E1 | 58751_90755 | 35,999 | 5.0% | 103 | 55,653 | 3.0% | 97 | 57,550 | 3.1% | 96 | 19,654 | 1,896 |
| E2 | 54146_90847 | 39,805 | 4.9% | 105 | 65,620 | 3.3% | 97 | 68,960 | 3.2% | 95 | 25,815 | 3,339 |
| E3 | 90842_58737 | 39,820 | 4.9% | 105 | 69,222 | 3.2% | 50 | 73,950 | 3.1% | 37 | 29,401 | 4,729 |
| E4 | 58242_58730 | 0 | 0.0% | 0 | 1,674 | 0.0% | 80 | 3,096 | 0.0% | 80 | 1,674 | 1,422 |
| E5 | 28923_58712 | 10,704 | 3.6% | 52 | 12,695 | 5.4% | 52 | 11,992 | 6.1% | 52 | 1,990 | -703 |
| E6 | 56148_59850 | 71,749 | 8.0% | 102 | 89,865 | 6.7% | 95 | 90,857 | 6.7% | 95 | 18,115 | 992 |
| E7 | 59832_56140 | 72,134 | 7.4% | 98 | 89,266 | 6.4% | 92 | 89,547 | 6.5% | 92 | 17,132 | 281 |
| E8 | 56136_55335 | 22,474 | 10.0% | 55 | 25,388 | 8.2% | 53 | 26,432 | 8.5% | 52 | 2,914 | 1,044 |
| E9 | 55335_56112 | 22,827 | 8.4% | 20 | 24,701 | 7.3% | 10 | 25,232 | 7.3% | 8 | 1,875 | 530 |

Note: Speed is given in kph

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Appendix B Modelled Ecological Receptor Locations.

| Transect 1 | X Co-ordinate | Y Co-ordinate | Transect 2 | X Co-ordinate | Y Co-ordinate |
|------------|---------------|---------------|------------|---------------|---------------|
| E01_4.9m | 464233 | 103579 | E02_15.45m | 464003 | 102705 |
| E01_10m | 464238 | 103577 | E02_20m | 463999 | 102703 |
| E01_20m | 464247 | 103573 | E02_30m | 463989 | 102700 |
| E01_30m | 464256 | 103568 | E02_40m | 463980 | 102697 |
| E01_40m | 464265 | 103564 | E02_50m | 463970 | 102694 |
| E01_50m | 464274 | 103560 | E02_60m | 463961 | 102691 |
| E01_60m | 464283 | 103556 | E02_70m | 463951 | 102688 |
| E01_70m | 464292 | 103552 | E02_80m | 463942 | 102685 |
| E01_80m | 464301 | 103547 | E02_90m | 463932 | 102682 |
| E01_90m | 464310 | 103543 | E02_100m | 463923 | 102679 |
| E01_100m | 464319 | 103539 | E02_110m | 463913 | 102676 |
| E01_110m | 464329 | 103535 | E02_120m | 463904 | 102672 |
| E01_120m | 464338 | 103530 | E02_130m | 463894 | 102669 |
| E01_130m | 464347 | 103526 | E02_140m | 463885 | 102666 |
| E01_140m | 464356 | 103522 | E02_150m | 463875 | 102663 |
| E01_150m | 464365 | 103518 | E02_160m | 463866 | 102660 |
| E01_160m | 464374 | 103514 | E02_170m | 463856 | 102657 |
| E01_170m | 464383 | 103509 | | | |
| E01_180m | 464392 | 103505 | | | |
| E01_190m | 464401 | 103501 | | | |
| E01_200m | 464410 | 103497 | | | |

| Transect 3 | X Co-ordinate | Y Co-ordinate | Transect 4 | X Co-ordinate | Y Co-ordinate |
|------------|---------------|---------------|------------|---------------|---------------|
| E03_3.9m | 464204 | 103589 | E04_26.1m | 464670 | 104307 |
| E03_10m | 464199 | 103592 | E04_30m | 464673 | 104305 |
| E03_20m | 464189 | 103596 | E04_40m | 464681 | 104299 |
| E03_30m | 464180 | 103600 | E04_50m | 464690 | 104294 |
| E03_40m | 464171 | 103603 | E04_60m | 464698 | 104288 |
| E03_50m | 464162 | 103607 | E04_70m | 464707 | 104283 |
| E03_60m | 464153 | 103611 | E04_80m | 464715 | 104277 |
| E03_70m | 464143 | 103615 | E04_90m | 464723 | 104272 |
| E03_80m | 464134 | 103619 | E04_100m | 464732 | 104267 |
| E03_90m | 464125 | 103623 | E04_110m | 464740 | 104261 |
| E03_100m | 464116 | 103627 | E04_120m | 464748 | 104256 |
| E03_110m | 464107 | 103631 | E04_130m | 464757 | 104250 |
| E03_120m | 464097 | 103635 | E04_140m | 464765 | 104245 |
| E03_130m | 464088 | 103639 | E04_150m | 464774 | 104239 |
| E03_140m | 464079 | 103643 | E04_160m | 464782 | 104234 |
| E03_150m | 464070 | 103646 | E04_170m | 464790 | 104228 |
| E03_160m | 464060 | 103650 | E04_180m | 464799 | 104223 |
| E03_170m | 464051 | 103654 | E04_190m | 464807 | 104218 |
| E03_180m | 464042 | 103658 | E04_200m | 464816 | 104212 |
| E03_190m | 464033 | 103662 | | | |
| E03_200m | 464024 | 103666 | | | |

| Transect 5 | X Co-ordinate | Y Co-ordinate | Transect 6 | X Co-ordinate | Y Co-ordinate |
|------------|---------------|---------------|------------|---------------|---------------|
| E05_32.95m | 462840 | 105636 | E06_15.7m | 468812 | 105203 |
| E05_40m | 462841 | 105629 | E06_20m | 468808 | 105205 |
| E05_50m | 462841 | 105619 | E06_30m | 468801 | 105212 |
| E05_60m | 462841 | 105609 | E06_40m | 468793 | 105218 |
| E05_70m | 462841 | 105599 | E06_50m | 468785 | 105225 |
| E05_80m | 462841 | 105589 | E06_60m | 468778 | 105231 |
| E05_90m | 462841 | 105579 | E06_70m | 468770 | 105237 |
| E05_100m | 462842 | 105569 | E06_80m | 468762 | 105244 |
| E05_110m | 462842 | 105559 | E06_90m | 468755 | 105250 |
| E05_120m | 462842 | 105549 | E06_100m | 468747 | 105257 |
| E05_130m | 462842 | 105539 | E06_110m | 468739 | 105263 |
| E05_140m | 462842 | 105529 | E06_120m | 468732 | 105270 |
| E05_150m | 462842 | 105519 | E06_130m | 468724 | 105276 |
| E05_160m | 462843 | 105509 | E06_140m | 468716 | 105282 |
| E05_170m | 462843 | 105499 | E06_150m | 468709 | 105289 |
| E05_180m | 462843 | 105489 | E06_160m | 468701 | 105295 |
| E05_190m | 462843 | 105479 | E06_170m | 468693 | 105302 |
| E05_200m | 462843 | 105469 | | | |

| Transect 7 | X Co-ordinate | Y Co-ordinate | Transect 8 | X Co-ordinate | Y Co-ordinate |
|------------|---------------|---------------|------------|---------------|---------------|
| E07_10.8m | 468851 | 105163 | E08_6.75m | 467422 | 104083 |
| E07_20m | 468857 | 105155 | E08_10m | 467425 | 104082 |
| E07_30m | 468863 | 105148 | E08_20m | 467435 | 104080 |
| E07_40m | 468869 | 105140 | E08_30m | 467445 | 104078 |
| E07_50m | 468876 | 105132 | E08_40m | 467455 | 104077 |
| E07_60m | 468882 | 105124 | E08_50m | 467464 | 104075 |
| E07_70m | 468888 | 105117 | E08_60m | 467474 | 104073 |
| E07_80m | 468895 | 105109 | E08_70m | 467484 | 104071 |
| E07_90m | 468901 | 105101 | E08_80m | 467494 | 104069 |
| E07_100m | 468907 | 105093 | E08_90m | 467504 | 104067 |
| E07_110m | 468913 | 105086 | E08_100m | 467514 | 104065 |
| E07_120m | 468920 | 105078 | E08_110m | 467523 | 104063 |
| E07_130m | 468926 | 105070 | E08_120m | 467533 | 104061 |
| E07_140m | 468932 | 105062 | E08_130m | 467543 | 104059 |
| E07_150m | 468939 | 105054 | E08_140m | 467553 | 104057 |
| E07_160m | 468945 | 105047 | E08_150m | 467563 | 104056 |
| E07_170m | 468951 | 105039 | E08_160m | 467572 | 104054 |
| E07_180m | 468958 | 105031 | E08_170m | 467582 | 104052 |
| E07_190m | 468964 | 105023 | E08_180m | 467592 | 104050 |
| E07_200m | 468970 | 105016 | E08_190m | 467602 | 104048 |
| | | | E08_200m | 467612 | 104046 |

Transect 9 **X Co-ordinate** **Y Co-ordinate**

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| E09_8.05m | 467394 | 104084 |
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| E09_10m | 467392 | 104085 |
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| E09_20m | 467383 | 104087 |
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| E09_30m | 467373 | 104088 |
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| E09_40m | 467363 | 104090 |
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| E09_50m | 467353 | 104092 |
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| E09_60m | 467343 | 104093 |
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| E09_70m | 467333 | 104095 |
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| E09_80m | 467323 | 104097 |
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| E09_90m | 467314 | 104099 |
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| E09_100m | 467304 | 104100 |
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| E09_110m | 467294 | 104102 |
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| E09_120m | 467284 | 104104 |
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| E09_130m | 467274 | 104106 |
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| E09_140m | 467264 | 104107 |
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| E09_150m | 467254 | 104109 |
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| E09_160m | 467245 | 104111 |
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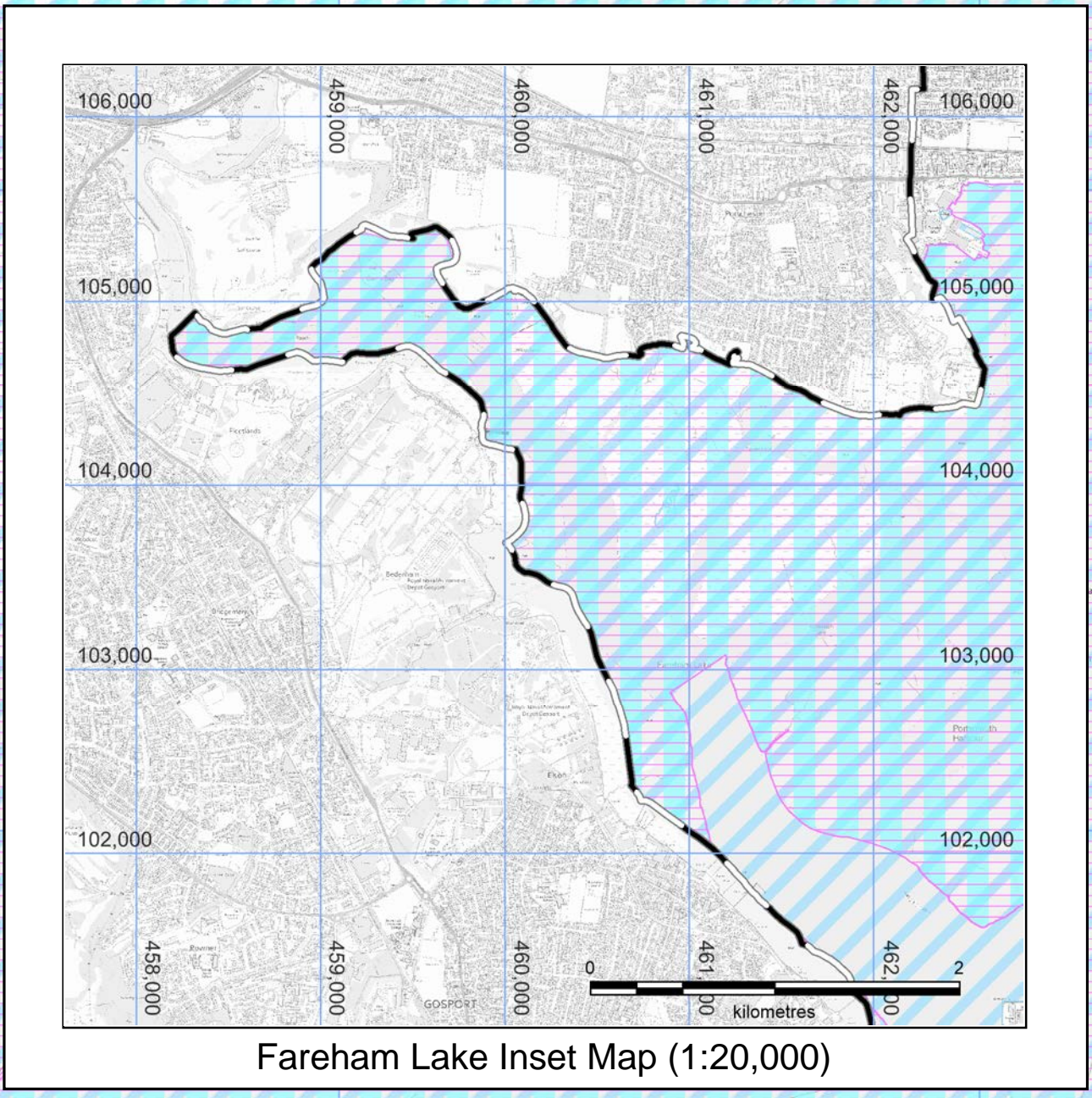
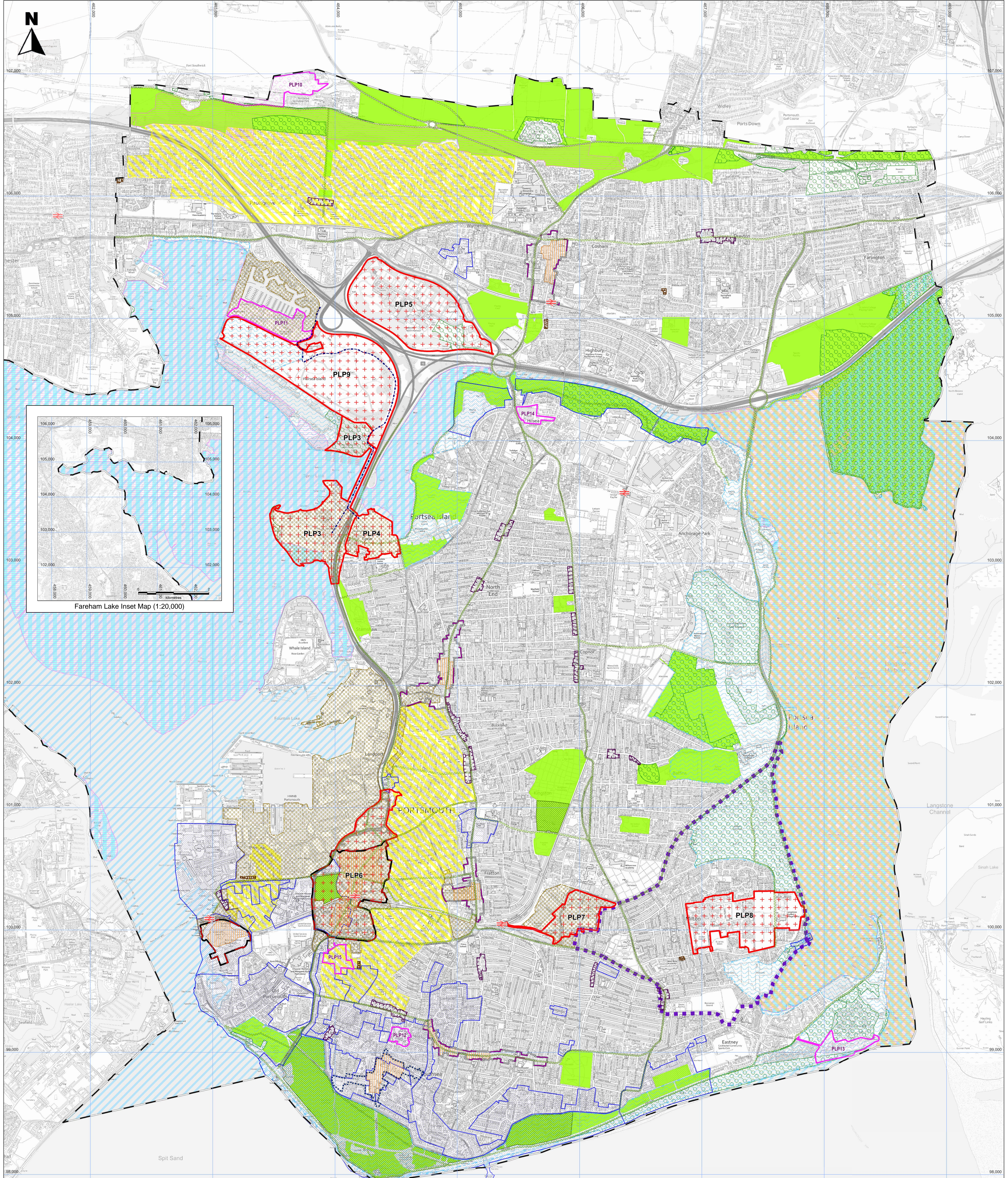
| | | |
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| E09_170m | 467235 | 104113 |
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| E09_180m | 467225 | 104114 |
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| E09_190m | 467215 | 104116 |
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| E09_200m | 467205 | 104118 |
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Explanatory text for the Policies Map accompanying the Pre-Submission Portsmouth Local Plan

The draft Policies Map accompanies the Pre-Submission Portsmouth Local Plan. It is a spatial expression of Local Plan, Neighbourhood Plan and Minerals and Waste Plan policies. The Policies Map illustrates the policies in map form. When using the Pre-Submission Local Plan, reference should be made to the draft Policies Map when the policy makes clear there are location-specific or area-specific policy requirements.

The overall Policies Map illustrating the following policies:

- All allocations (Policies PLP3 to PLP15) and the estate renewal area (Policy PLP23)
- All City-wide policies that are location specific such as areas for tall building (Policy PLP1)

There are four separate sheets of inset maps illustrating the following policies:

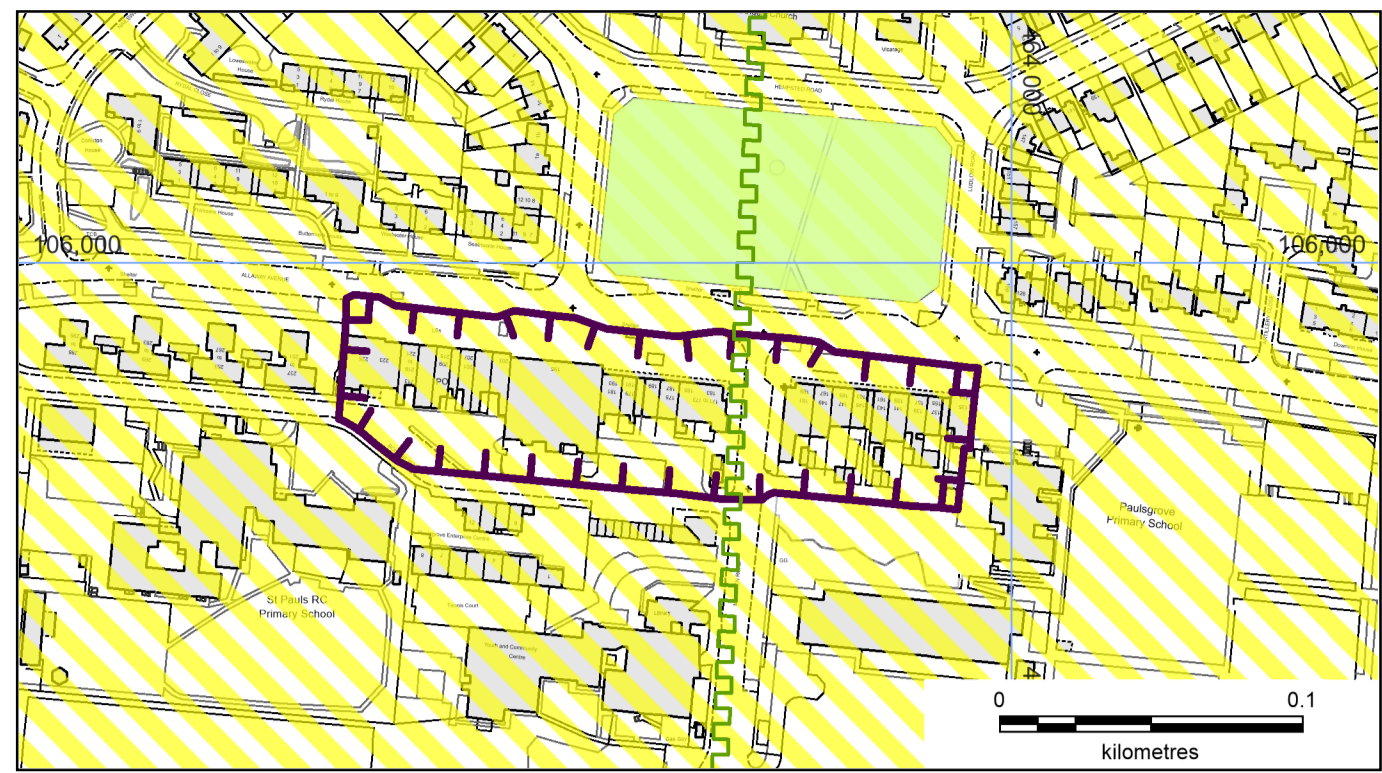
- All centres identified in the Town Centre Hierarchy (Policy PLP28) - two sheets
- Residential density zones (Policy PLP21)
- Milton Neighbourhood Plan (made 2022)

The draft Policies Map which accompanies the Pre-Submission Portsmouth Local Plan is published as a pdf. Once the Local Plan is adopted an interactive version will be made available on the City Council's website.

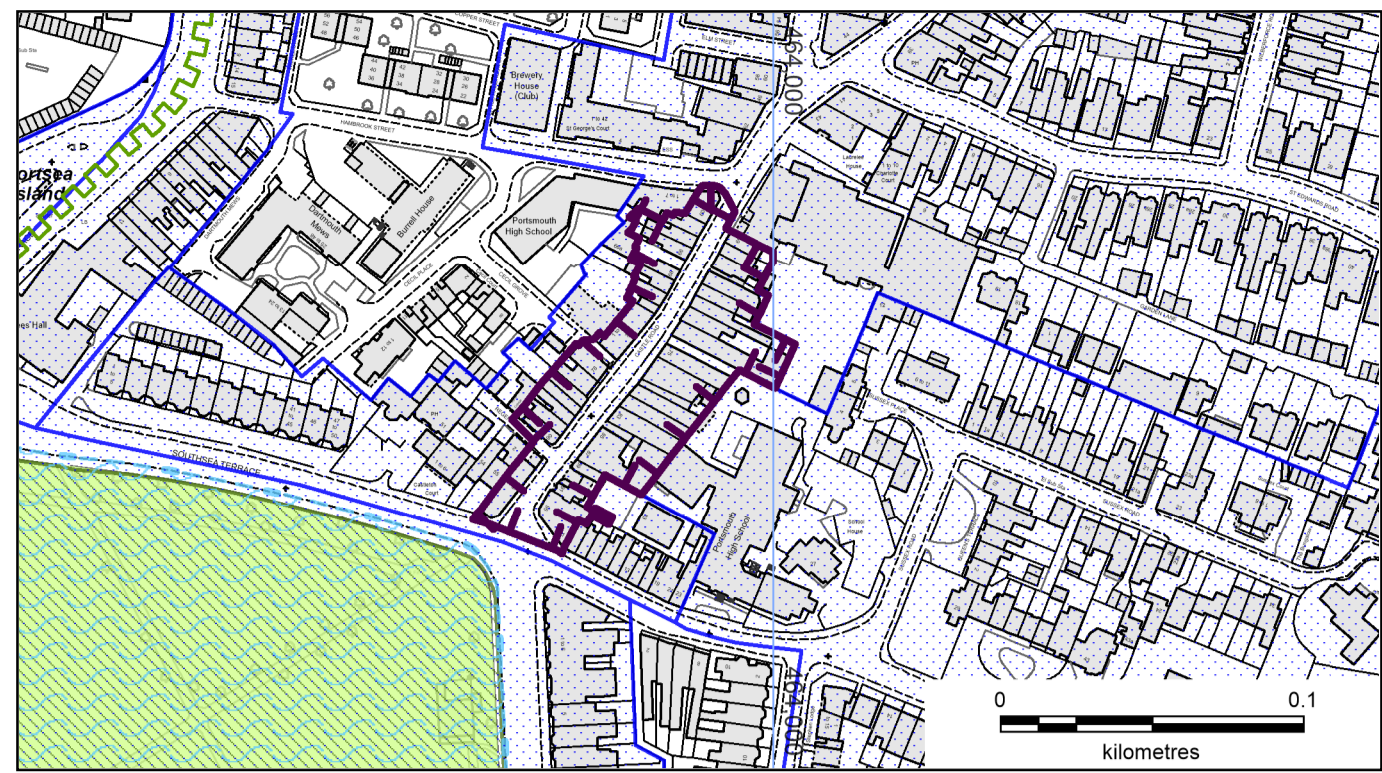
| Legend | | Thriving Economy | | Greening the City | | Other | |
|--------|--------------------------------------|------------------|----------------------|-------------------|---|-------|---|
| | Development Strategy & Core Policies | | City Centre - PLP28 | | Green Infrastructure (GI) Corridors - PLP38 | | Portsmouth City Administrative Boundary |
| | Opportunity Area for Tall Buildings | | Town Centre | | International, National & Local Nature Designations - PLP39 | | Milton Neighbourhood Plan Boundary |
| | Strategic Sites | | District Centre | | SPA - Special Protection Area | | Proposed Bus/Cycle Route |
| | Strategic Site: PLP3 to PLP9 | | Local Centre | | SAC - Special Area of Conservation | | Railway Station |
| | Allocation Site: PLP10 to PLP15 | | Neighbourhood Centre | | SSSI - Site of Special Scientific Interest | | |
| | Estate Renewal - PLP23 | | Core Commercial Area | | Local Nature Reserve | | |
| | Conservation Area - PLP55 | | Coastal Zone - PLP36 | | Sites of Importance for Nature Conservation (SINCs) | | |
| | Registered Historic Park | | Climate Emergency | | Local Green Space - PLP46 | | |

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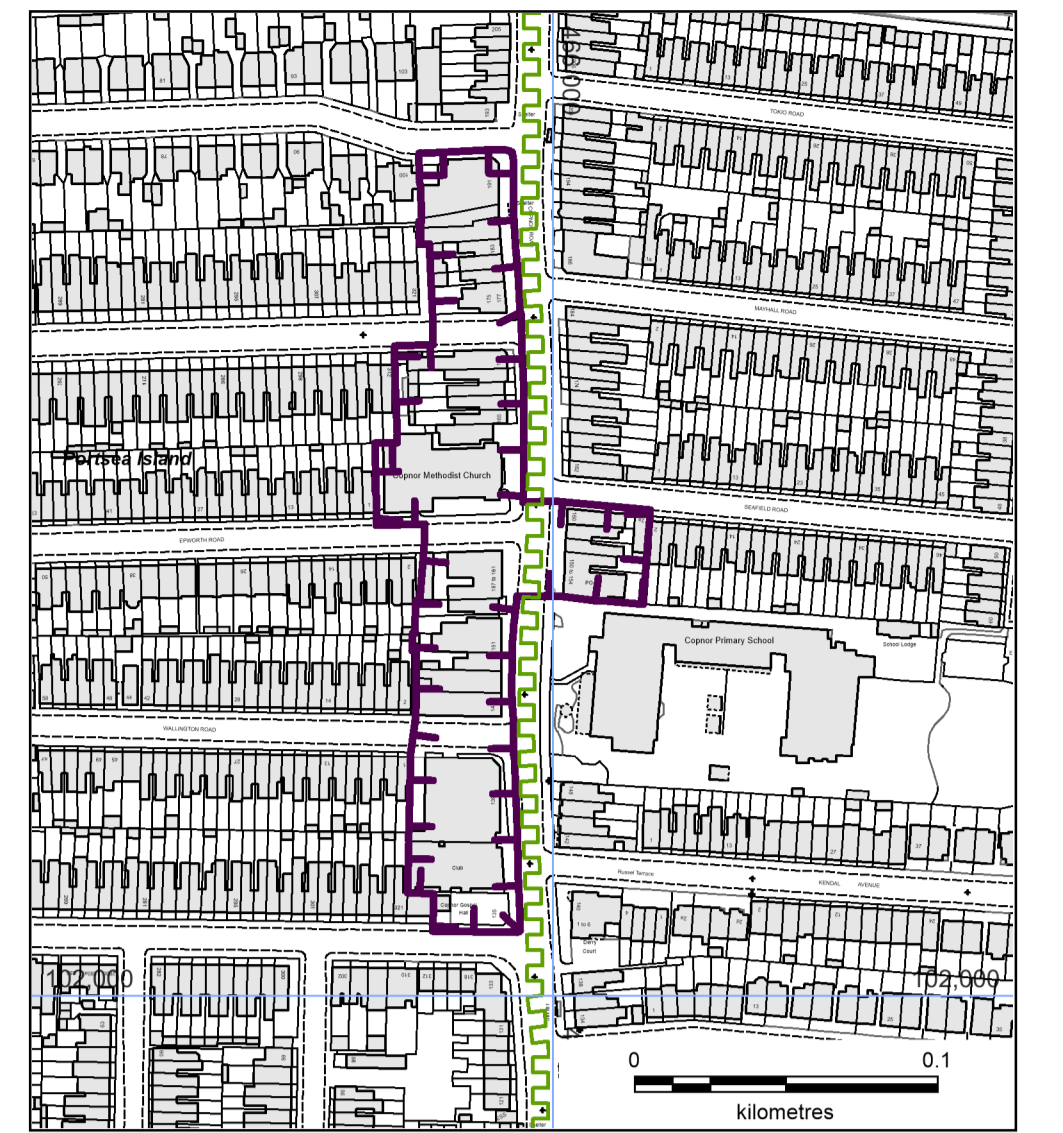
Allway Avenue - Local Centre (1:2500)



Castle Road - Local Centre (1:2500)



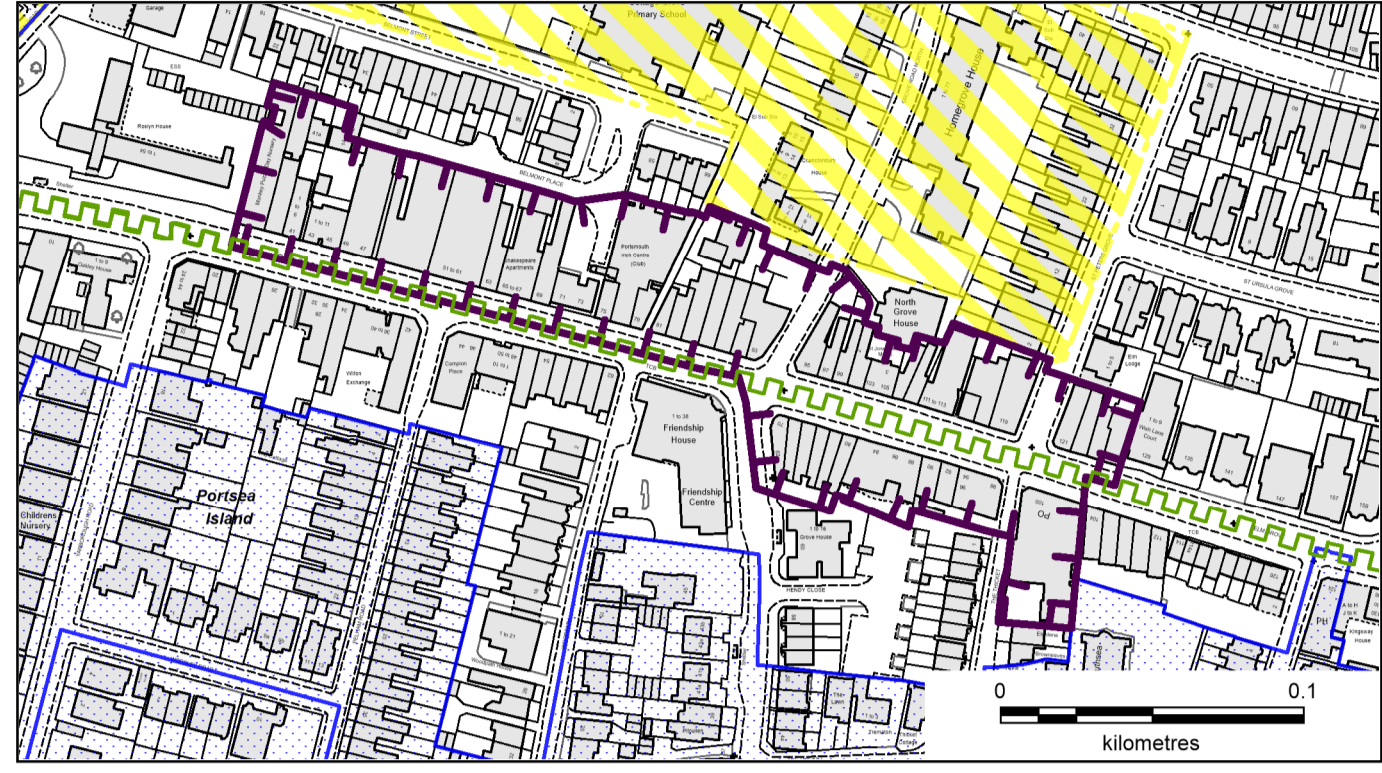
Copnor Road North - Local Centre (1:2500)



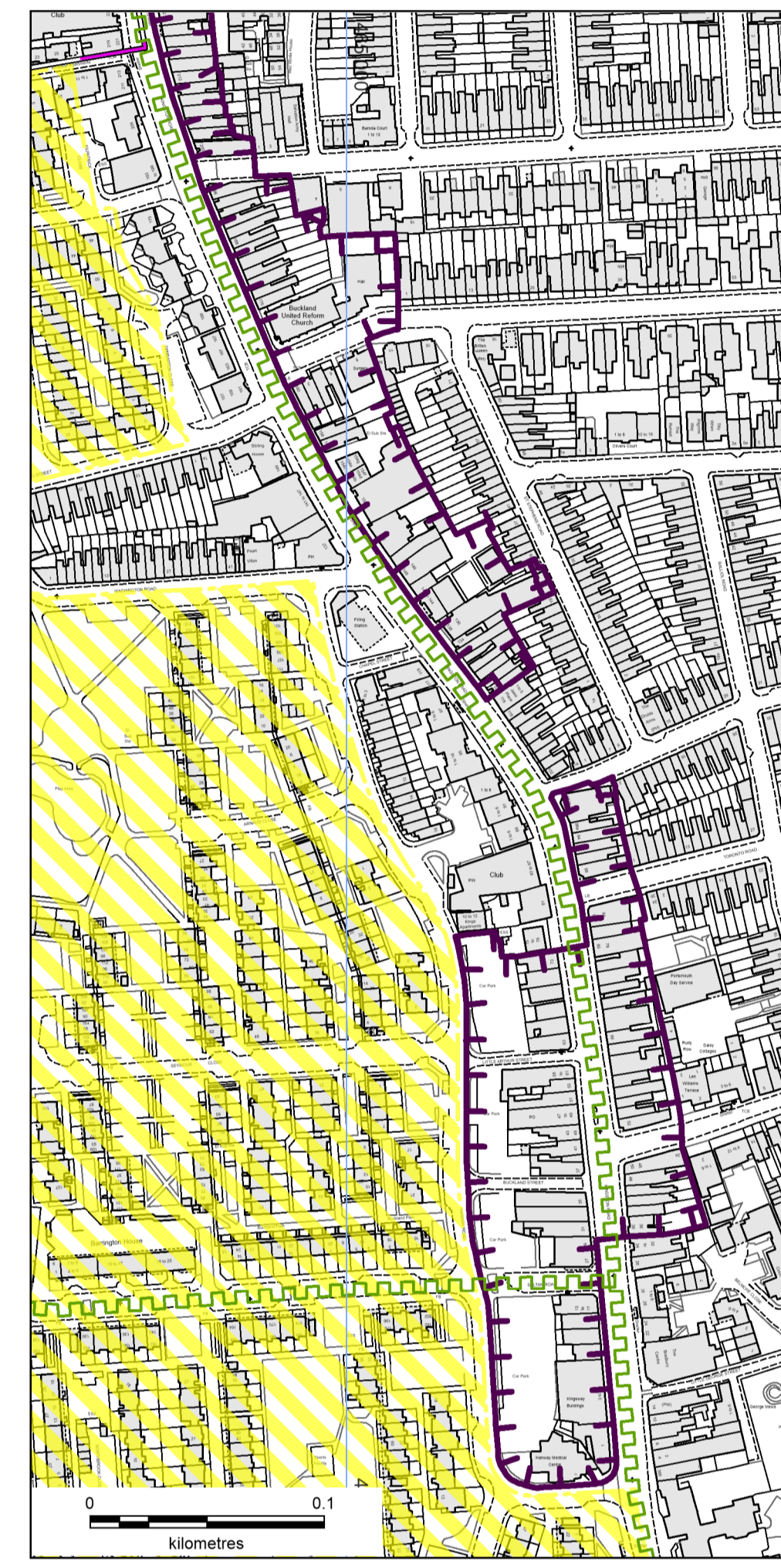
Copnor Road South - Local Centre (1:2500)



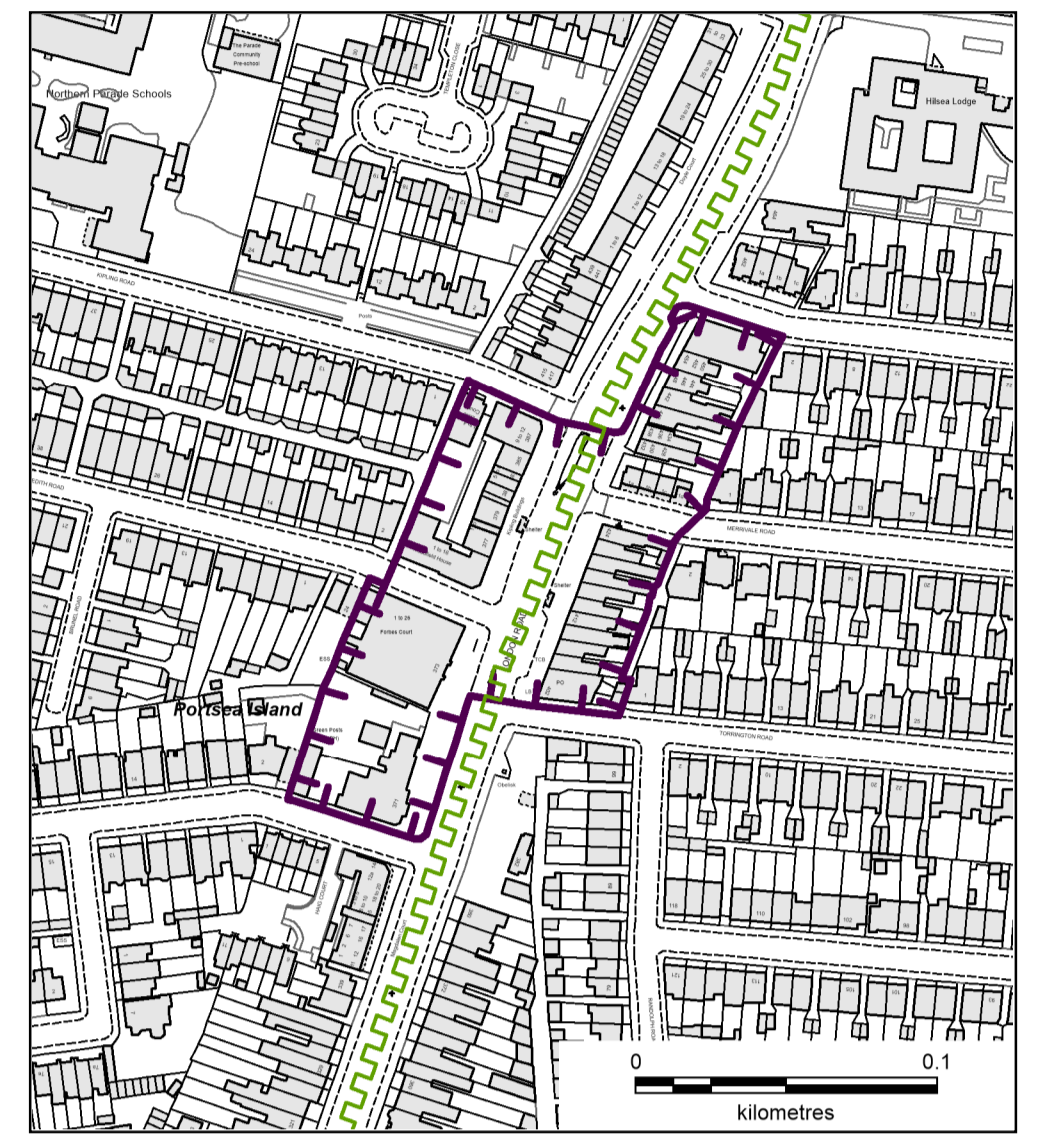
Eastrey Road - Local Centre (1:2500)



Elm Grove - Local Centre (1:2500)



Kingston Road - Local Centre (1:2500)



London Road North - Local Centre (1:2500)



Fawcett Road - Local Centre (1:2500)



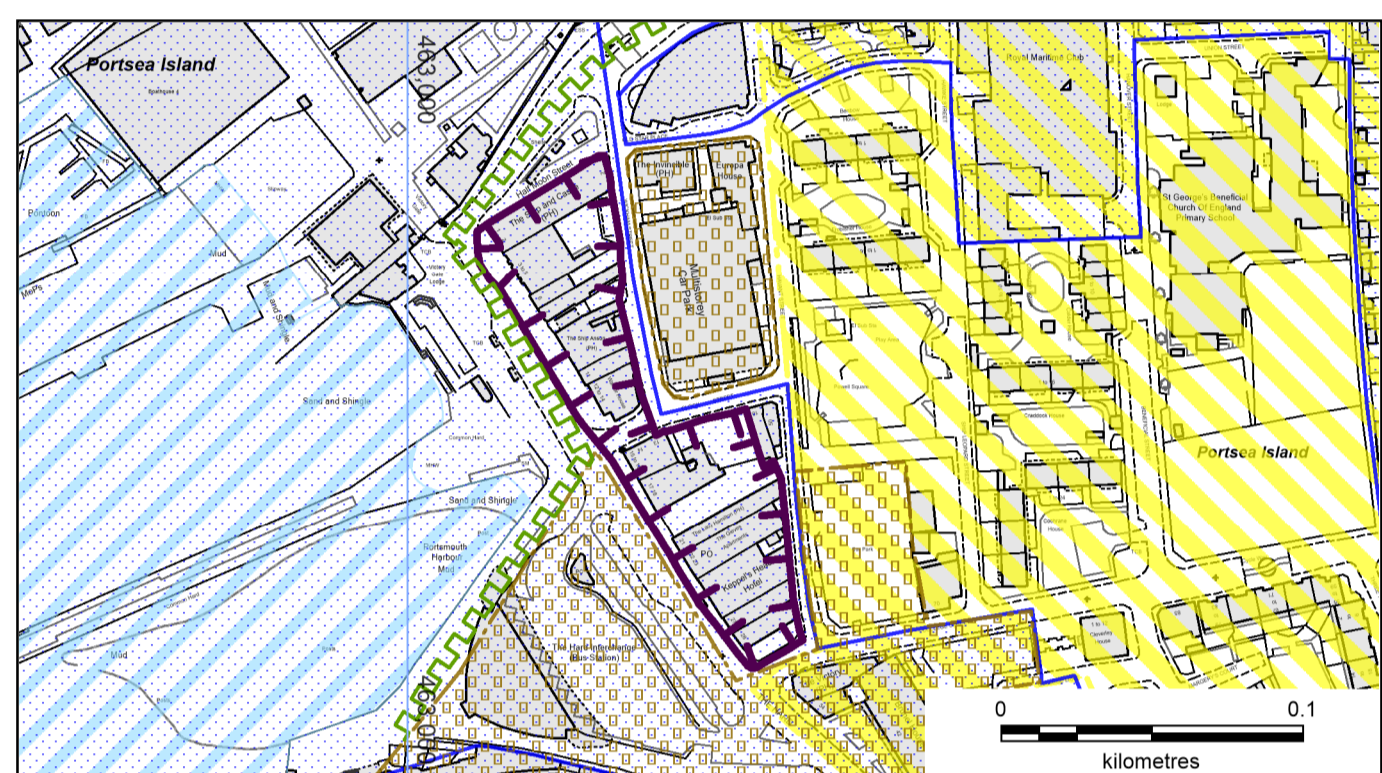
Havant Road - Local Centre (1:2500)



London Road South - Local Centre (1:2500)



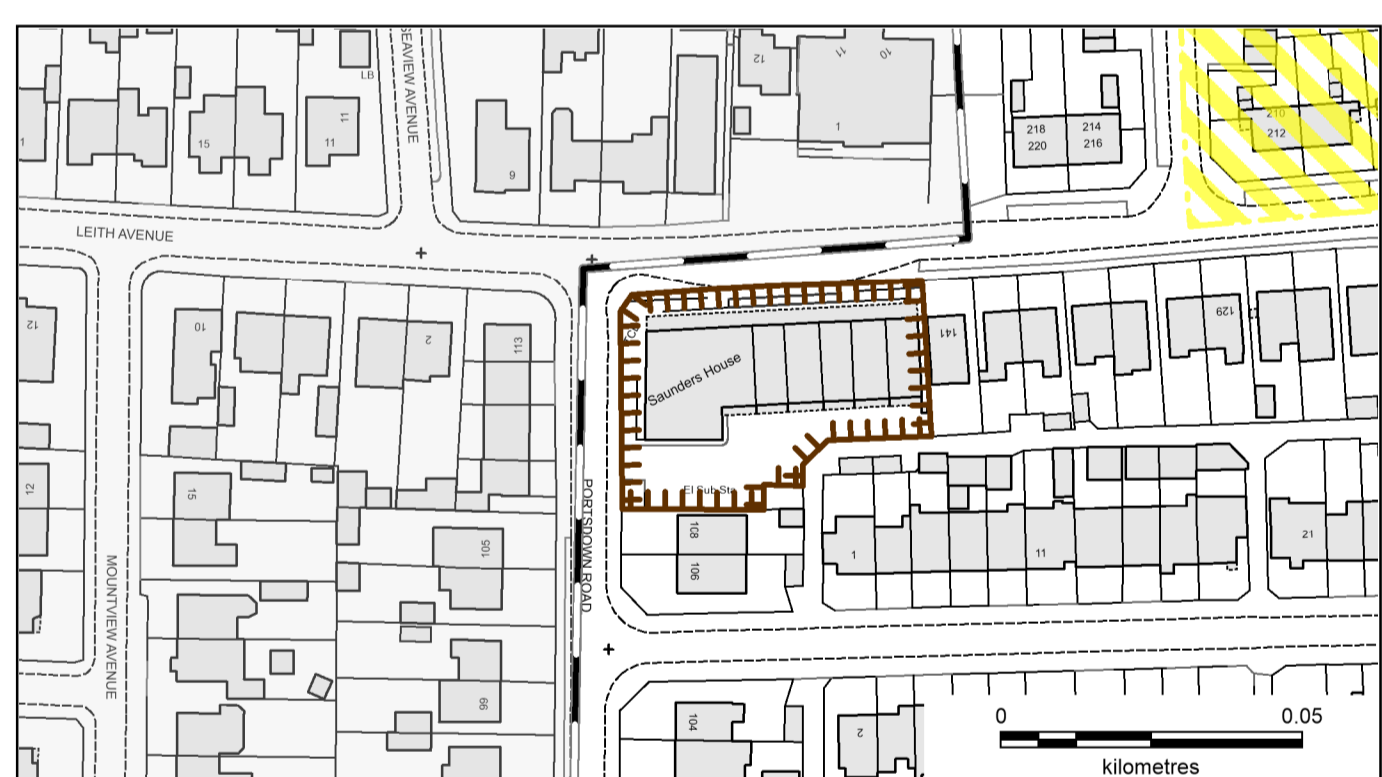
Tanger Road - Local Centre (1:2500)



The Hard - Local Centre (1:2500)



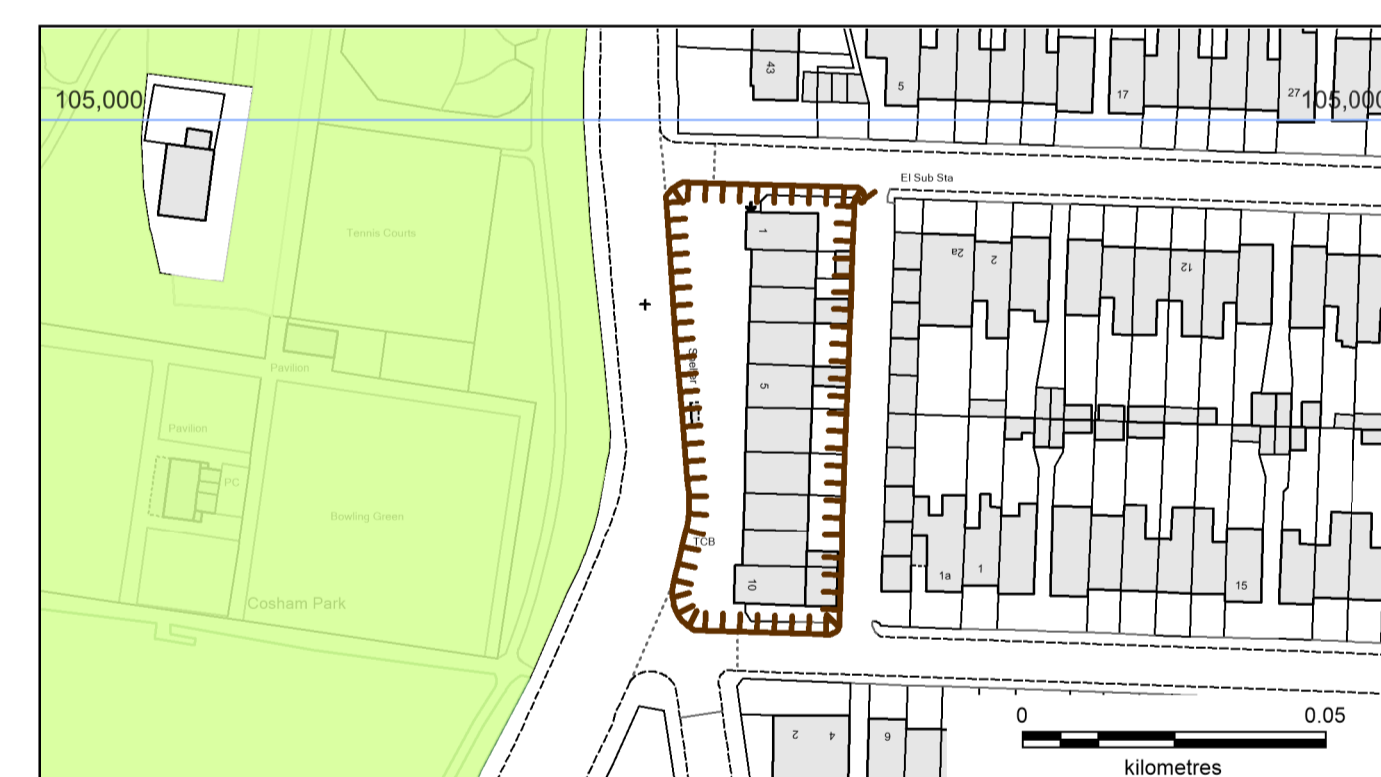
Winter Road - Local Centre (1:2500)



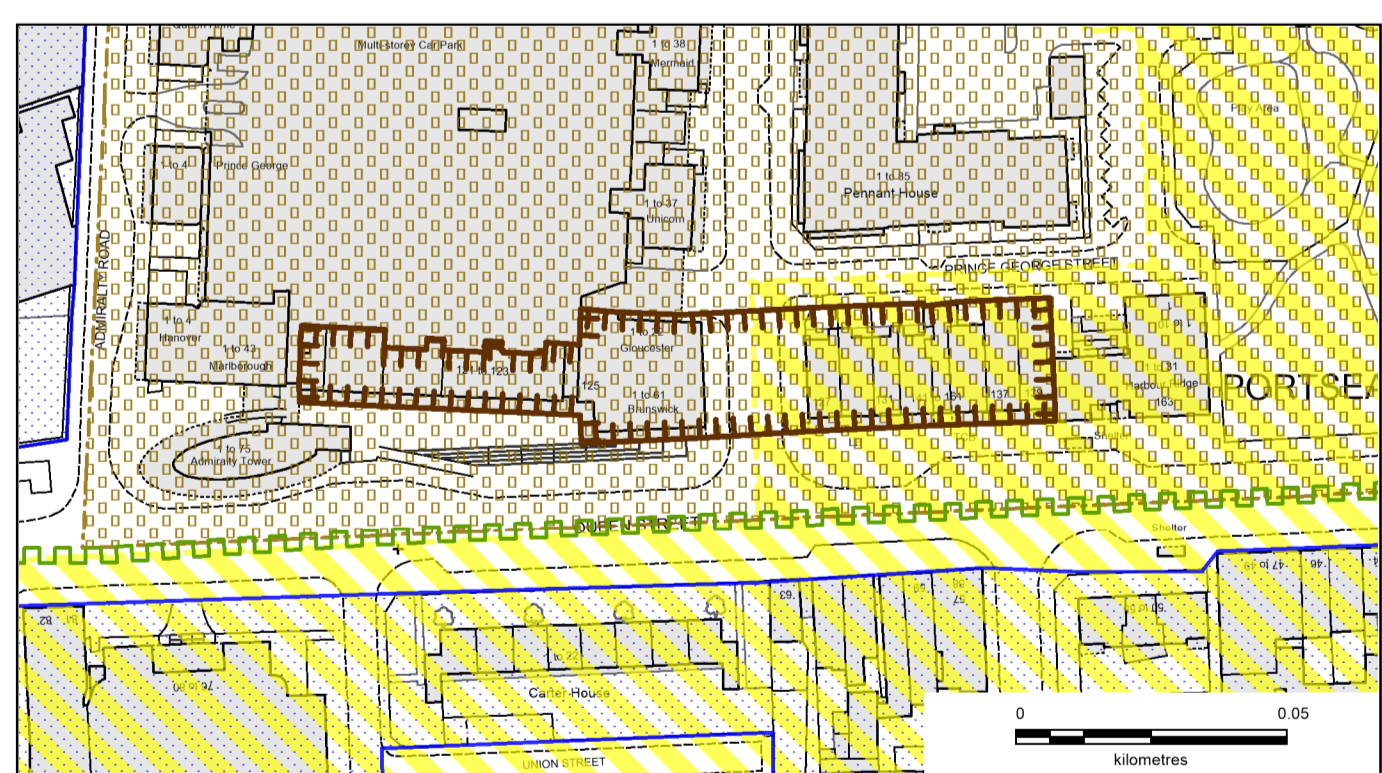
Leith Avenue - Neighbourhood Centre (1:1250)



Lockway Road - Neighbourhood Centre (1:1250)



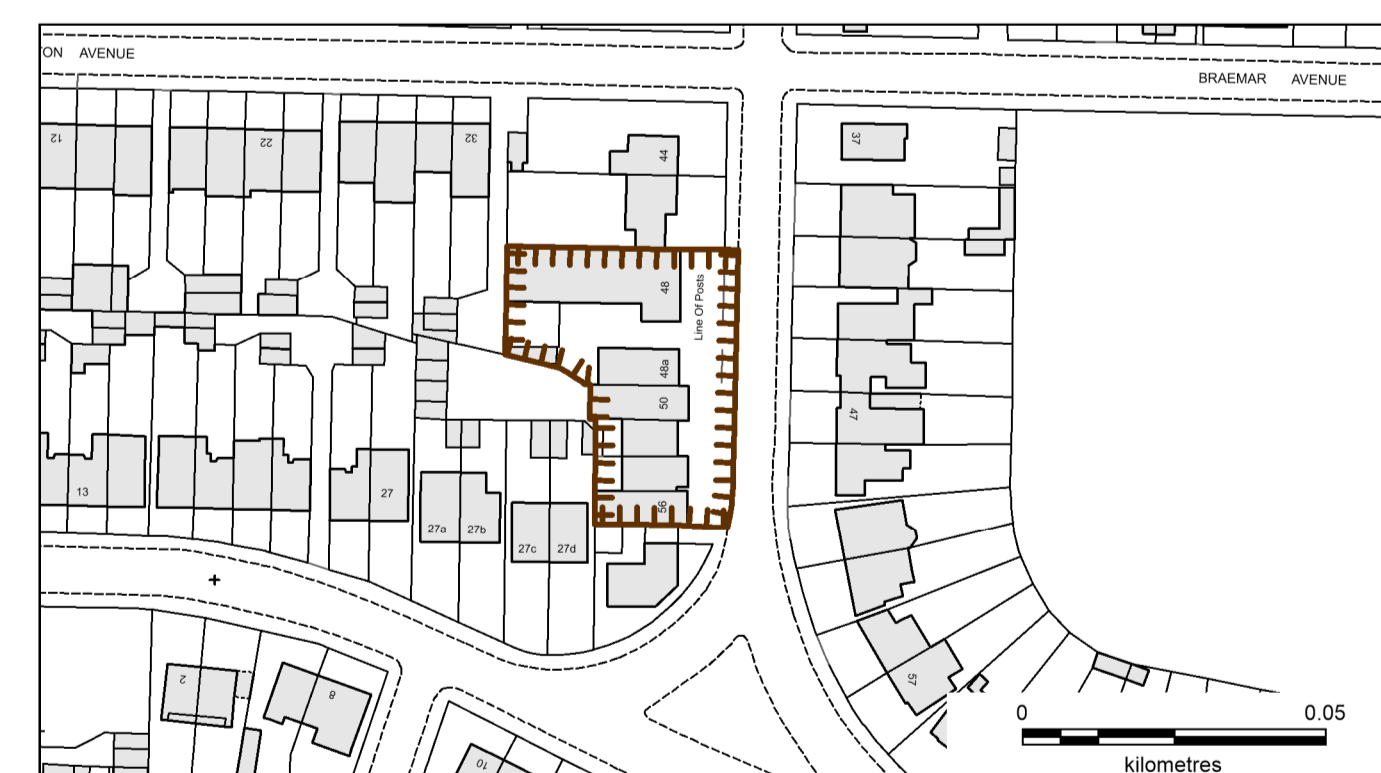
Portsmouth Road - Neighbourhood Centre (1:1250)



Queen Street - Neighbourhood Centre (1:1250)



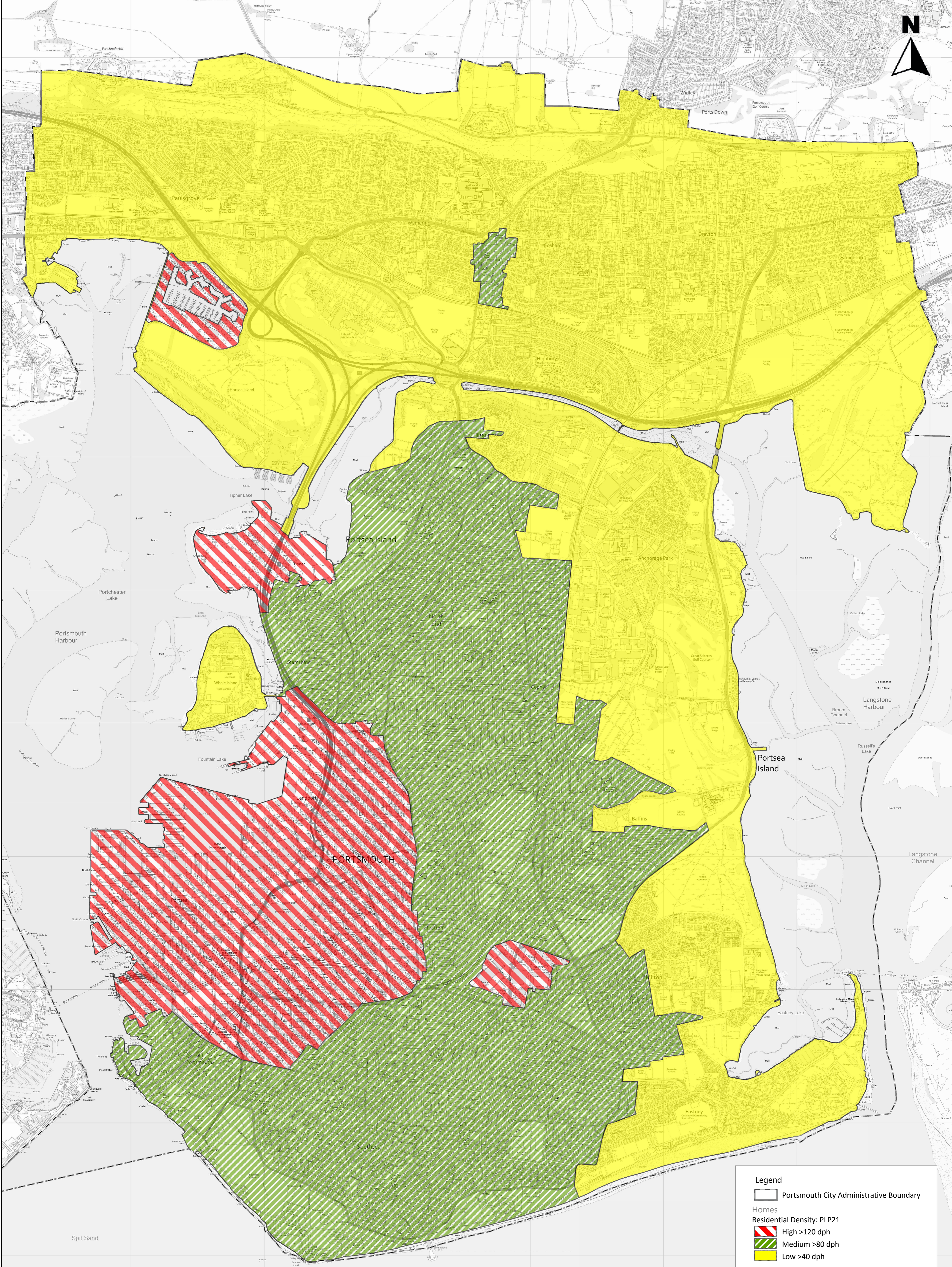
St James's Road - Neighbourhood Centre (1:1250)







Tregaron Avenue - Neighbourhood Centre (1:1250)

| Legend | | |
|--------|--------------------------------------|---|
| | Development Strategy & Core Policies | Opportunity Area for Tall Buildings |
| | Strategic Sites | Strategic Site: PLP3 to PLP9 |
| | Site Allocations | Allocation Site: PLP10 to PLP15 |
| | Homes | Estate Renewal - PLP23 |
| | Heritage | Conservation Area - PLP55 |
| | | Registered Historic Park |
| | Thriving Economy | Town Centres: PLP28 |
| | | City Centre |
| | | Town Centre |
| | | District Centre |
| | | Local Centre |
| | | Neighbourhood Centre |
| | | Core Commercial Area |
| | Climate Emergency | Coastal Zone - PLP36 |
| | Greening the City | Green Infrastructure (GI) Corridors - PLP38 |
| | | Local Green Space - PLP46 |
| | | Portsmouth City Administrative Boundary |
| | | Milton Neighbourhood Plan Boundary |

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Legend

-  Portsmouth City Administrative Boundary
- Homes Residential Density: PLP21
 -  High >120 dph
 -  Medium >80 dph
 -  Low >40 dph

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Title:
**Draft Policies Map for the draft
 Pre-Submission Portsmouth Local Plan**

Plan Status: **Reg 19
 Consultation**

Date: 7th February 2024
 Scale: 1:20,000 @A0

Inset Maps Title:
Residential Density





















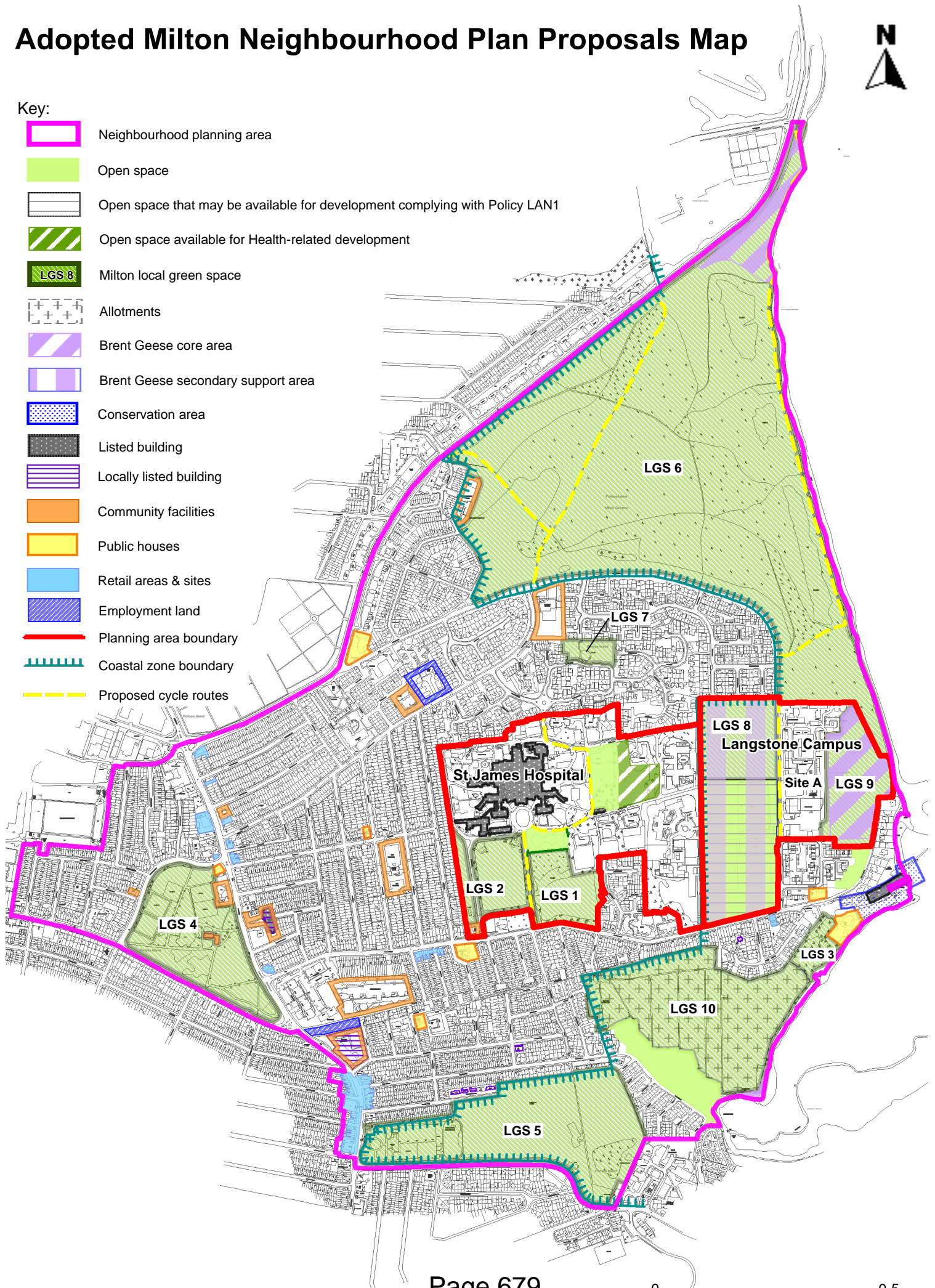
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Adopted Milton Neighbourhood Plan Proposals Map



Key:

-  Neighbourhood planning area
-  Open space
-  Open space that may be available for development complying with Policy LAN1
-  Open space available for Health-related development
-  Milton local green space
-  Allotments
-  Brent Geese core area
-  Brent Geese secondary support area
-  Conservation area
-  Listed building
-  Locally listed building
-  Community facilities
-  Public houses
-  Retail areas & sites
-  Employment land
-  Planning area boundary
-  Coastal zone boundary
-  Proposed cycle routes



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| Form name | Integrated Impact Assessment |
| Reference | IA586166373 |
| Date | 12/02/2024 |



Policy details

| | |
|--|--|
| Request date | 12/02/2024 16:16 |
| Directorate | PCC Regeneration |
| Service | Planning |
| Title of policy, service, function | Pre-Submission Portsmouth Local Plan |
| Type of policy, service, function | New |
| What is the aim of your policy, service, function, project or strategy? | The new local plan will form the planning policy framework in Portsmouth and has been positively prepared to guide development in the City up to 2040. |
| Has any consultation been undertaken for this proposal? | yes |
| What were the outcomes of the consultations? | <p>The Local Plan has progressed through three Regulation 18 consultations.</p> <p>In Spring 2024, the Local Plan will go to pre-submission (Regulation 19 stage).</p> <p>The last round of regulation 18 assessment included a health impact assessment, the findings of which influenced the regulation 19 plan policies.</p> |
| Has anything changed because of the consultation? | yes |
| Please provide details | <p>The policies in the Reg 19 Local Plan have been informed by the feedback on the three Regulation 18 consultations. There have also been a number of All Member Local Plan Workshops in which Members provided a steer on both allocation and city-wide policies.</p> <p>The latest version of the Local Plan has been amended in several ways in regard to equality, health and wellbeing in response to the findings of the IIA.</p> |

| | |
|---------------------------------------|---|
| Did this inform your proposal? | yes |
| Please provide details | Policies within the Regulation 19 plan and its supporting evidence base have been updated following the Regulation 18 consultations and its health impact assessment. The Local Plan is moving ahead with the pre-submission Regulation 19 plan, for consultation on the matters of soundness and legal compliance only. As explained changes have been made to the document in response to this IIA. |

Equality & diversity - will it have any positive/negative impacts on the protected characteristics?

| | |
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| <p>With the above in mind and following data analysis, who is the policy, service, function, project or strategy going to benefit or have a detrimental effect on and how?</p> | <p>All policies within the Local Plan have been assessed as part of an Integrated Impact Assessment (IIA), against the nine protected characteristics:</p> <ul style="list-style-type: none"> - Age - Disability - Gender reassignment - Marriage of civil partnership - Pregnancy and maternity - Race - Religion or belief - Sex - Sexual orientation <p>The assessment has identified and considered any possible beneficial or detrimental effects that may arise from the policies and implemented changes to the policies where necessary to avoid discrimination and negative impacts upon people with protected characteristics.</p> <p>As the development strategy for the City, the Local Plan will have an impact on all those who live and work in and visit Portsmouth, regardless of their characteristics. It is not expected that the Local Plan will have a detrimental effect on any group. The Local Plan will benefit all who live and work in and visit Portsmouth by implementing the Council's Imagine Portsmouth 2040 Vision.</p> <p>A full review of all the Local Plan policies and their impact on factors relating to health and equality is attached as an appendix to this assessment.</p> |
|---|---|

As an overview, a number of changes have been made to the Local Plan to reduce inequality in the City. The Thriving Economy chapter is one of the key sections of the plan seeking through its policies to reduce barriers to employment for economically inactive people including those with protected characteristics.

Age:

The Local Plan will impact all people in Portsmouth regardless of age. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the Age protected characteristic.

The provision of new homes in Portsmouth will benefit existing and future residents of all ages. The Local Plan includes specific policies to meet the needs of older adults, with regards to the provision of housing for older adults, and those with disabilities and mobility impairments.

Policy PLP8 for St James' and Langstone Campus specifically allocates for elderly persons and sheltered accommodation. This will have a positive impact on older adults in Portsmouth by providing suitable housing to meet local needs.

Housing mix policy (PLP18) sets out the housing types which should be delivered as part of any residential development to deliver a variety of homes which cater to the population of Portsmouth and provide high quality homes and create inclusive, mixed and sustainable communities. The Local Plan aims to ensure the provision of specialist housing for specific groups, including for older adults and specialist and supported housing, including for children and young people where there is need through the policy Housing for Specific Groups (PLP19).

As the population of older adults in Portsmouth is projected to increase, the number of people with disabilities is also likely to increase. These policies will benefit the growing number of vulnerable older people in Portsmouth who have higher support needs and may require specialist accommodation. It is also expected that the targeted provision may provide opportunities for downsizing and release larger family-sized accommodation to be available for families. This will also improve health and wellbeing for all by ensuring new

homes are accessible, adaptable, suitable and safe for people of all ages.

Policy PLP27 Employability and Skills supports development which provide childcare facilities within or in close proximity to employment sites, which will benefit children and young people in Portsmouth.

Overall, it is considered the Plan as a whole and its policies will have a positive impact on Age.

Disability:

The Local Plan will impact all people in Portsmouth regardless of disability (including physical and mental health related disabilities). It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the Disability protected characteristic.

The Local Plan through the core Design policy (PLP1), aims to ensure development is designed to consider lifespan and that it is accessible and adaptable to the changing needs of its users.

Many of the strategic site policies in the Local Plan are focussed on supporting development in sustainable locations where key facilities and services are accessible by walking, cycling, public transport or other sustainable transport modes. The Local Plan also supports car-free or low-car development on its strategic sites and the provision of infrastructure such as walkways, bridges, and accessible off-road pedestrian and cycle routes to support safe and suitable access for all.

This will increase accessibility for all people to community services and facilities, shops, employment and recreation spaces, regardless of disability within Portsmouth.

PLP8 St James' and Langstone Campus specifically allocates for the provision of healthcare facilities, which will support health and wellbeing in Portsmouth for the treatment of physical and mental health conditions.

The Local Plan seeks to support those with disabilities and those who may become disabled in the future. As the population of older adults in Portsmouth is projected to increase, the number of people with disabilities is also likely to increase.

with disabilities through the Housing Mix policy (PLP18), which sets out the housing types which should be delivered as part of any residential development to deliver a variety of homes which cater to the population of Portsmouth and provide high quality homes and create inclusive, mixed and sustainable communities. The Housing for Specific Groups policy (PLP19) ensures that specialist and supported accommodation is provided, which includes accommodation suitable for those with disabilities and support needs, relating to both physical and mental health.

It is considered these the Local Plan will positively benefit those with Disabilities.

Gender Reassignment:

The Local Plan will impact all people in Portsmouth regardless of gender reassignment. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the Gender reassignment protected characteristic.

Many of the strategic site policies in the Local Plan, as well as the Town Centres (PLP30) and Community and Leisure Facilities (PLP52) policies support the retention and provision of community facilities, which can include healthcare services. The St James' and Langstone Campus policy (PLP8) also specifically allocates for the provision of healthcare services at the site. Policy PLP50 Infrastructure also seeks to support the delivery of appropriate, necessary and reasonable infrastructure development in Portsmouth.

The Local Plan by supporting the provision of community facilities, including access to healthcare services will continue to support individuals to explore their gender identity and access information on gender reassignment or receive or gender affirming surgery.

The Local Plan and its policies are considered to have a neutral impact on gender reassignment.

Marriage or Civil Partnerships:

The Local Plan will impact all people in Portsmouth regardless of marriage or civil partnership. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the marriage or civil partnership protected characteristic.

well as the Town Centres (PLP30) and Community and Leisure Facilities (PLP52) policies support the retention and provision of community facilities, which can include places of worship or registered venues for marriage and civil partnership ceremonies). The St James' and Langstone Campus policy (PLP8) specifically seeks to retain the Grade II Listed Chapel at the site.

The Local Plan by supporting the provision of community facilities, including places of worship and registered ceremony venues will continue to provide opportunities for marriage and civil partnership. It is therefore considered the Local Plan will have a neutral impact on marriage and civil partnership.

Pregnancy and maternity:

The Local Plan will impact all people in Portsmouth regardless of pregnancy and maternity. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the pregnancy and maternity protected characteristic.

Many of the strategic site policies in the Local Plan, as well as the Town Centres (PLP30) and Community and Leisure Facilities (PLP52) policies support the retention and provision of community facilities, which can include healthcare services. The St James' and Langstone Campus policy (PLP8) also specifically allocates for the provision of healthcare services at the site. Policy PLP50 Infrastructure also seeks to support the delivery of appropriate, necessary and reasonable infrastructure development in Portsmouth.

The Local Plan by supporting the provision of community facilities, including access to healthcare services will continue to support pregnancy and maternity care in Portsmouth.

It is therefore considered the Local Plan will have a positive impact on pregnancy and maternity.

Race:

The Local Plan will impact all people in Portsmouth regardless of race. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the race protected characteristic.

It is not considered that the Local Plan as a whole or any of its policies discriminate against any particular race or

ethnicity.

The Local Plan through the Gypsies, Travellers and Travelling Showpeople policy (PLP24) aims to ensure fair and equal treatment, in a way that facilitates the traditional and nomadic life of travellers while respecting the interests of the settled community.

In Portsmouth, there is no identified need for either permanent or transit sites for Gypsies and Travellers for the plan period to 2040. There are also no Travelling Showpeople yards in the City and no current or future (to 2040) need for plots.

It is therefore considered that the Local Plan has a positive/neutral impact on race.

Religion or belief:

The Local Plan will impact all people in Portsmouth regardless of religion or belief. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the religion or belief protected characteristic.

Many of the strategic site policies in the Local Plan, as well as the Town Centres (PLP30) and Community and Leisure Facilities (PLP52) policies support the retention and provision of community facilities, which can include places of worship. The City Centre policy (PLP6) retains the Grade II* listed St Agatha's Church and the All Saints Church and provide new links between the two through a substantial new park. The St James' and Langstone Campus policy (PLP8) specifically seeks to retain the Grade II listed Chapel at the site.

The Local Plan is not aimed at supporting a specific religion or belief, but instead seeks to support the future development of Portsmouth as a whole. It is therefore considered that the Local Plan has a neutral impact on religion or belief.

Sex:

The Local Plan will impact all people in Portsmouth regardless of sex. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the sex protected characteristic.

The Local Plan seeks to reduce gendered violence against women and girls and support the Council's strategy for tackling violence against women & girls

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| | <p>strategy for tackling violence against women & girls. This is included specifically in the policies for Design (PLP1) and the Public Realm (PLP49) to improve safety and feelings of safety in Portsmouth. It is considered that development which tackles violence against women and girls will benefit all people regardless of sex. Therefore, it is considered that the Local Plan has a positive impact on sex.</p> <p>Sexual orientation: The Local Plan will impact all people in Portsmouth regardless of sexual orientation. It is not considered at this stage that any of the policies within the Local Plan will have a disproportionate impact on the sexual orientation protected characteristic.</p> <p>It is considered that the Local Plan has a neutral impact on sexual orientation.</p> |
| <p>Will any of those groups be affected in a different way to others because of your policy, project, service, function, or strategy?</p> | <p>Some of the policies within the Local Plan will have a direct impact on particular identified groups, including those with protected characteristics. The new local plan seeks to address inequalities experienced by disadvantaged groups. However it is not considered that the policies individually or the Plan as a whole will negatively affect other groups.</p> |
| <p>If you are directly or indirectly discriminating, how are you going to mitigate the negative impact?</p> | <p>The Local Plan and its policies are not considered to discriminate directly or indirectly against any group.</p> |
| <p>Who have you consulted with or are planning to consult with and what was/will be your consultation methodology?</p> | <p>The Local Plan has progressed through three Regulation 18 consultations.</p> <p>In Spring 2024, the Local Plan will go to pre-submission (Regulation 19 stage) if approved by Full Council. The Pre-Submission Local Plan will be considered by Members at Cabinet and then Full Council. Subject to approval by Members the Pre-Submission consultation will run for six weeks focused on matters of legal compliance and soundness only.</p> |

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| <p>How are you going to review the policy, service, project or strategy, how often and who will be responsible?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |
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Crime - Will it make our city safer?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The Local Plan seeks to help overcome crime and disorder and fear of crime in Portsmouth. The Design policy (PLP1) is a core policy which seeks to ensure all development in the City is designed to reduce crime, disorder and fear of crime, so that people can feel safe and be safe in Portsmouth.</p> <p>The allocation of strategic sites in the Plan will have positive impacts for safety by bringing disused sites into use and ensure the City is welcoming to all.</p> <p>The Public Realm policy (PLP49) also seeks to improve the public realm in Portsmouth through good design to improve safety. This has a particular focus on eradicating violence against women and girls, addressing gendered violence in the City.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Housing - will it provide good quality homes?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The Local Plan seeks to deliver new homes to meet the needs of the City’s growing population over the plan period of 2020-2040. The plan identifies that 13,603 net additional homes during the Plan period will be provided.</p> <p>The Local Plan aims to deliver the first objective of the Imagine Portsmouth 2040 Vision so that all our residents and communities live in good homes where they feel safe, feel like they belong, and can thrive. A number of policies within the Local Plan directly and positively impact on increasing the provision of good quality homes in Portsmouth.</p> <p>The Design Policy (PLP1) is a core policy for the Local Plan, which seeks to ensure all types of development in Portsmouth are of high quality.</p> <p>Within Chapter 6 'Homes' of the Local Plan, there are several policies which will have a positive impact on the provision of good quality homes. The Housing Target policy (PLP16) is about delivering good homes to meet the needs of the city's growing population. The Affordable Homes policy (PLP17) aims to deliver affordable housing to meet need. The Housing Mix (PLP18) policy aims to provide a mix of housing for different groups to meet local housing need, including for family homes, accessible and adaptable homes. Policy PLP19 Housing for Specific Groups also seeks to support specialist housing to meet local housing need and create inclusive and healthy communities.</p> <p>The Space Standards Policy (PLP22) will assist the provision of safe and high-quality living standards and environments, with homes designed to meet current and future housing needs and support good physical and mental wellbeing.</p> <p>The estate renewal policy (PLP23) seeks to improve the quality of existing Portsmouth City Council owned housing stock to create healthier and safer homes that are of high quality and sustainable design.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Health - will this help promote healthy, safe and independent living?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The Local Plan aims to achieve the first objective of the Imagine Portsmouth 2040 Vision for a healthy and happy City, to do everything we can to enhance wellbeing for everyone in our city by offering the education, care and support that every individual needs for their physical and mental health.</p> <p>Many of the strategic site policies seek to promote active travel and prioritise sustainable transport, to encourage physical activity and reduce poor air quality in the City. Improving access to existing and new green open spaces will increase the ability of everyone in Portsmouth to access the health benefits from places for leisure, recreation and play. Green infrastructure and green open spaces on the doorstep of homes and workplaces will provide spaces for physical and social activities, provide equitable access to nature and its benefits, as well as improve biodiversity, creating healthy and happy communities in Portsmouth.</p> <p>The housing policies in the Local Plan seek to support the provision of high quality, sustainable and suitable housing to accommodate the needs of everyone in Portsmouth. The residential density policy (PLP21) aims to focus housing in sustainable locations, with appropriate density development to support health and wellbeing, encourage active travel, increase social connectivity and support accessibility to local employment, services and facilities.</p> <p>The Green Infrastructure policy (PLP38) seeks to positively contribute towards the provision of green infrastructure and enhancement of the green grid in the City. The green grid is made up of open spaces, local green space and green corridors that link areas of green space within the City, providing access to green spaces and corridors for people and nature to enjoy.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Income deprivation and poverty - will it consider income deprivation and reduce poverty?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The new Local Plan aspires to deliver the second and third objectives of the Imagine Portsmouth 2040 Vision so that Portsmouth is a City with a thriving economy and of lifelong learning.</p> <p>The Plan aims to deliver on the Portsmouth Economic Development and Regeneration Strategy to 'make Portsmouth Britain's premier waterfront technology and innovation city – a great place to invest, learn, live, work and visit and the most attractive place for starting, growing or relocating a business.'</p> <p>The Employment Target policy (PLP25) sets out employment land provision in order to provide 7,000 new homes in the City The Employability and Skills policy (PLP27) aims to raise local skill levels and aspirations, diversify the skills of the workforce. It will address barriers to employment for those who are economically inactive and those with protected characteristics, and support equitable access to local jobs.</p> <p>The Housing Target policy (PLP16) seeks to deliver new housing provision in Portsmouth, equating to 13,603 net additional homes during the Plan period of 2020-2040 with a net annual provision of approximately 680 homes . This includes the delivery of housing through houses in multiple occupation (HMOs), which plays a key part in meeting the needs of those who require a more affordable housing option.</p> <p>There is a notable need for affordable housing in Portsmouth, making the provision of affordable homes a key and pressing issue for the future. The Affordable Homes policy (PLP17) seeks to ensure that major development proposals make on-site provision for a minimum of 30% of the total residential dwellings as affordable homes. This aims to maximise the provision of affordable housing in Portsmouth wherever possible and to support those who cannot afford to rent or secure a property on the open market in the City.</p> |
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| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |
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Carbon emissions - will it reduce carbon emissions?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>Policies within the new Local Plan aim to deliver on the fifth strategic objective of the Imagine Portsmouth 2040 Vision and make Portsmouth a green City. This will positively impact the local and wider environment by ensuring that Portsmouth is carbon neutral, uses renewable energy and actively works to address climate change.</p> <p>The Local Plan includes a chapter on addressing the climate emergency in Portsmouth, which follows on from the City Council declaring a climate change emergency in March 2019.</p> <p>The Local Plan includes seven policies relating to the climate emergency, which seek to reduce greenhouse gas emissions, improve air quality and reduce energy consumption in Portsmouth.</p> <p>The core policy Climate Emergency (PLP2) will ensure that all new development meets the objectives set out by the City Council's Climate Change Declaration and Climate Change Strategy. This will support development in Portsmouth which minimises energy use and waste, maximises renewable and low carbon energy sources, encourages recycling and the reuse of existing buildings, to reduce greenhouse gas emissions.</p> <p>In December 2023 the Government issued a Written Ministerial Statement preventing local energy efficiency standards for buildings that go beyond current or planned buildings regulation. This has prevented the City Council from including ambitious targets for energy efficiency in its Local Plan in line with its Climate Change Strategy. The Council is disappointed by this decision and encourages the Government to bring in the necessary changes to the energy efficiency building regulations at the earliest possible opportunity.</p> |
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| | <p>Sustainable Construction and Onsite Renewable Energy policy (PLP33) seeks to reduce energy consumption to reduce the City's carbon emissions and the negative impact of construction on the environment. This sets out how new development should be built in a sustainable way minimising environmental and carbon impacts. The Renewable Energy policy (PLP34) relates to the provision of new renewable energy infrastructure in Portsmouth. It aims to encourage sustainable energy generation within the City to contribute to the City's Climate Emergency Declaration and the aim of carbon neutrality by 2030.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Energy use - will it reduce energy use?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>Policies within the new Local Plan aim to deliver on the fifth strategic objective of the Imagine Portsmouth 2040 Vision and make Portsmouth a green City. This will positively impact the local and wider environment by ensuring that Portsmouth is carbon neutral, uses renewable energy and actively works to address climate change.</p> <p>In December 2023 the Government issued a Written Ministerial Statement preventing local energy efficiency standards for buildings that go beyond current or planned buildings regulation. This has prevented the City Council from including ambitious targets for energy efficiency in its Local Plan in line with its Climate Change Strategy. The Council is disappointed by this decision and encourages the Government to bring in the necessary changes to the energy efficiency building regulations at the earliest possible opportunity.</p> <p>Several policies seek to reduce energy use, water consumption, and waste.</p> <p>The Sustainable Construction and Onsite Renewable Energy (PLP33) policy seeks to reduce energy use by encouraging sustainable and efficient resource use and improving water efficiency.</p> <p>The Renewable Energy policy (PLP34) aims to encourage sustainable energy generation to contribute to the City's Climate Emergency Declaration and the aim of carbon neutrality by 2030. Encouraging Portsmouth's transition towards renewable and low-carbon energy sources will reduce greenhouse gas emissions generated by fossil fuels, benefitting everyone in Portsmouth and the environment.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>Policies within the new Local Plan aim to deliver on the fifth strategic objective of the Imagine Portsmouth 2040 Vision and make Portsmouth a green City. This will positively impact the local and wider environment by ensuring that Portsmouth is carbon neutral, uses renewable energy and actively works to address climate change.</p> <p>In December 2023 the Government issued a Written Ministerial Statement preventing local energy efficiency standards for buildings that go beyond current or planned buildings regulation. This has prevented the City Council from including ambitious targets for energy efficiency in its Local Plan in line with its Climate Change Strategy. The Council is disappointed by this decision and encourages the Government to bring in the necessary changes to the energy efficiency building regulations at the earliest possible opportunity.</p> <p>Several policies within the Local Plan seek to build resistance to impacts of climate change including sea level rise and flood risk. Policies for Flooding (PLP31) and Sustainable Drainage Systems (PLP32) aim to mitigate the impact of flood risk, implement flood management and reduce vulnerability to surface water flooding. Policy PLP31 does not allow basement dwellings in the City, which reduces the risk to life from flooding.</p> <p>The Sustainable Construction and Onsite Renewable Energy (PLP33) policy seeks to ensure all future development in Portsmouth is adaptable and resilient to climate change, to address rising temperatures and overheating during the lifetime of development.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Natural environment - will it ensure public spaces are greener, more sustainable and well-maintained?

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Policies within the new Local Plan aim to deliver on the fifth strategic objective of the Imagine Portsmouth 2040 Vision and make Portsmouth a green City which protects and enhances both our land and maritime environment for future generations.

The Local Plan includes a chapter on Greening the City in order to address the nature emergency declared by the Council in December 2021. The Local Plan sits alongside City Council strategies and initiatives and sets out the approach to meeting the commitments set by the nature emergency declaration.

Several policies within the Local Plan seek to positively contribute towards enhancing green infrastructure in the City and protecting green spaces. The Biodiversity Net Gain policy (PLP40) will ensure developments deliver improvements in biodiversity. The Trees and Hedgerows policy (PLP41) will impact positively on the natural environment in Portsmouth by protecting and increasing tree cover in Portsmouth, protecting habitats and encouraging biodiversity.

The Green Infrastructure policy (PLP38) seeks to increase and enhance green infrastructure in Portsmouth, to create green spaces and green corridors which benefit people, plants and animals. Policies for Open Space (PLP45) and Local Green Spaces (PLP46) also seek to protect and enhance green spaces in the City.

The Biodiversity policy (PLP39) will positively benefit biodiversity in Portsmouth by supporting development protecting green open spaces and conserving and enhancing biodiversity. It also sets out the approach for the protection of designated sites within Portsmouth. It will support the creation and improvement of wildlife habitats and support the protection and recovery of local species.

The Local Plan also seeks to protect the biodiversity of the Solent from eutrophication through the Nutrient Neutrality policy (PLP44), which will protect internationally important habitats.

The Solent Waders and Brent Geese (PLP42) and Recreational Disturbance (PLP43) policies will also positively impact upon species conservation and support biodiversity in Portsmouth by protecting habitats and mitigating the impact of residential development and

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| | recreational disturbance on protected species. |
| How are you going to measure/check the impact of your proposal? | The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. |

Air quality - will it improve air quality?

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| Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts? | <p>Policies within the new Local Plan aim to deliver on the fifth strategic objective of the Imagine Portsmouth 2040 Vision and make Portsmouth a green City with excellent air quality because of our green spaces and sustainable transport.</p> <p>The Air Quality and Pollution policy (PLP35) aims to help implement the Local Air Quality Plan and improve the City's air quality.</p> <p>The Local Plan will positively impact on air quality by reducing vehicle traffic and reliance on private vehicles in Portsmouth. It supports well-designed and appropriately located development to improve connectivity and improve infrastructure across the City for active and sustainable transport modes.</p> <p>Many of the strategic site policies seek to promote active travel and prioritise sustainable transport by supporting car-free or low-car development, reducing poor air quality in the City. The Movement and Transport policy (PLP47) which seeks to prioritise walking, cycling, and public and shared transport, will reduce emissions from private vehicles and improve air quality.</p> |
| How are you going to measure/check the impact of your proposal? | The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. |

Transport - will it make transport more sustainable and safer for the whole community?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>Policies within the Local Plan seek to deliver on the sixth strategic objective of the Imagine Portsmouth 2040 Vision so that Portsmouth is a city with easy travel. The Plan aims to ensure that fewer journeys are made by car because we have excellent public transport connections between bus, train, cycling and walking routes, making it easier and more enjoyable to be out and about. We encourage and support more walking and cycling, and we make it easy for people to travel regionally, nationally and internationally for work and pleasure.</p> <p>Many of the strategic site policies aim to deliver car-free or low-car developments to promote active travel and uptake of sustainable transport, and to minimise car dependency.</p> <p>The Local Plan seeks to deliver the objectives of the Local Transport Plan 4 to create an environment that encourages people in Portsmouth to travel sustainably within a safe, convenient, affordable to use, and efficient transport network.</p> <p>The impact of the Movement and Transport policy (PLP47) which seeks to prioritise walking, cycling, and public and shared transport will positively impact health and wellbeing. It will reduce travel inequality and improve accessibility by ensuring that future development in Portsmouth accommodates the needs of people with disabilities by all modes of transport.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Waste management - will it increase recycling and reduce the production of waste?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>A policy in the Local Plan chapter 8 on the Climate Emergency seeks to minimise the use of resources. Through the Sustainable Construction and Onsite Renewable Energy policy (PLP33), the Local Plan will reduce construction waste and energy use to encourage efficient resource use.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Culture and heritage - will it promote, protect and enhance our culture and heritage?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The Local Plan seeks to deliver on the second strategic objective of the Imagine Portsmouth 2040 Vision for a City rich in culture and creativity which will help drive Portsmouth's thriving economy.</p> <p>Policies within the Local Plan aim to preserve, conserve and enhance the City's historic environment, listed buildings, conservation areas, and scheduled monuments and archaeological heritage assets, through the Historic Environment (PLP53); Listed Buildings (PLP54); Conservation Areas (PLP55); and Archaeology (PLP56) policies.</p> <p>The Local Plan also seeks to deliver on the objectives of the Council's Economic Development and Regeneration Strategy and its Tourism and Visitor Economy Strategy, to support and grow Portsmouth's cultural and creative and visitor economy.</p> <p>This will make Portsmouth a City that people wish to visit, and improve access for all people to its rich culture and heritage.</p> |
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| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |
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Employment and opportunities - will it promote the development of a skilled workforce?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The Portsmouth Local Plan aims to deliver on the second and third strategic objectives of the Imagine Portsmouth 2040 Vision to make Portsmouth a City with a thriving economy and encourage lifelong learning. It will seek to build strong partnerships between employers and people to develop an excellent skills base and offer brilliant career opportunities to young people, students and adults.</p> <p>The Local Plan's Employment Target policy (PLP25) makes provision for 138,429m2 of new employment floorspace and aims to provide 7,000 new jobs over the plan period.</p> <p>The Employability and Skills policy (PLP27) will address barriers to employment for economically inactive people and barriers to work relating to equality. It will support development which raises local skills levels and increases employability for local people, to tackle skills shortages, reduce unemployment and create further opportunities for training.</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Economy - will it encourage businesses to invest in the city, support sustainable growth and regeneration?

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| <p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p> | <p>The Portsmouth Local Plan aims to deliver on the second and third strategic objectives of the Imagine Portsmouth 2040 Vision to make Portsmouth a City with a thriving economy and encourage lifelong learning. It will also seek to deliver on the objectives of the Portsmouth Economic Development and Regeneration Strategy to make Portsmouth Britain's premier waterfront technology and innovation city.</p> <p>Several strategic site policies will support employment and the growth of industries in Portsmouth, for example, through the allocation of marine employment floorspace at Tipner West and Horsea Island East (PLP3), and new office floorspace in the City Centre (PLP5) and Lakeside (PLP6).</p> <p>The Employability and Skills policy (PLP27) will also positively impact the local economy by addressing barriers to employment and providing employment opportunities for local people.</p> <p>The Local Plan seeks to ensure the vitality and viability of Portsmouth's Town Centres (PLP28) and support centres as the primary areas of economic growth and employment. The Plan also seeks to improve and diversify the local economy by supporting the growth of culture, creativity and tourism in Portsmouth through the Cultural and Visitor Economy policy (PLP30).</p> |
| <p>How are you going to measure/check the impact of your proposal?</p> | <p>The Local Plan will be monitored regularly over the plan period against set targets and indicators, as set out in Chapter 12: Monitoring of the Plan. A full list of the targets and indicators is set out in Table 12.1. The monitoring indicators have been applied to policies in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> |

Social value

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| <p>Please explain how your policy, service, function, project or strategy delivers Social Value</p> | <p>The Local Plan will deliver social value by achieving the Portsmouth 2040 Vision through both the Plan's site allocations and its City-wide policies.</p> <p>The Vision states that: 'In 2040 Portsmouth will be an island city with an incredible waterfront, a rich cultural heritage and a strong maritime history. With a naval base, international port and strong local links across the south, we are the centre of culture and enterprise for our area. In 2040 we are very proud of Portsmouth, how we behave towards each other and how it feels to live here.'</p> <p>Each Local Plan policy achieves one or more of the six strategic objectives, which are key to achieving the Imagine Portsmouth 2040 Vision.</p> <p>The Local Plan, as the statutory development plan for Portsmouth which guides future development in the City until 2040 aims to create a lasting and positive impact by helping to shape a resilient future for Portsmouth's local and regional communities, businesses and environment.</p> |
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Involvement

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| <p>Who was involved in the Integrated impact assessment?</p> | <p>Planning Policy Officers</p> |
| <p>Name of the person completing this form</p> | <p>Polly Murray</p> |
| <p>Date of completion</p> | <p>2024-02-12</p> |

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