
NOTICE OF MEETING

CABINET

TUESDAY, 27 JULY 2021 AT 12.00 PM

COUNCIL CHAMBER - THE GUILDHALL

Telephone enquiries to Anna Martyn Tel 023 9283 4870

Email: Democratic@portsmouthcc.gov.uk

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

Information with regard to public access due to Covid precautions:

- Attendees will be requested to undertake an asymptomatic/ lateral flow test within 48 hours of the meeting.
- If symptomatic you must not attend and self-isolate following the stay at home guidance issued by Public Health England.
- All attendees are required to wear a face covering while moving around within the Guildhall (requirement of the venue)
- Attendees will be required to take a temperature check on arrival (requirement of the venue)
- Although it will no longer be a requirement attendees may choose to keep a social distance and take opportunities to prevent the spread of infection
- Hand sanitiser is provided at the entrance and throughout the Guildhall. All attendees are encouraged to make use of hand sanitiser on entry to the Guildhall and are requested to follow the one way system in place.
- Attendees are encouraged book in to the venue (QR code). An NHS test and trace log will be retained and maintained for 21 days for those that cannot or have not downloaded the app.
- Those not participating in the meeting and wish to view proceedings are encouraged to do so remotely via the livestream link

Membership

Councillor Gerald Vernon-Jackson CBE (Chair)

Councillor Suzy Horton (Vice-Chair)

Councillor Chris Attwell

Councillor Dave Ashmore

Councillor Kimberly Barrett

Councillor Ben Dowling

Councillor Jason Fazackarley

Councillor Hugh Mason

Councillor Darren Sanders

Councillor Lynne Stagg

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

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

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

A G E N D A

An updated risk assessment for the Council Chamber will be published in due course.

1 Apologies for Absence

2 Declarations of Interests

3 Record of Previous Decision Meeting - 22 June 2021 (Pages 7 - 12)

A copy of the record of the previous decisions taken at Cabinet on 22 June 2021 are attached.

4 Draft Portsmouth Local Plan Consultation with Local Plan Consultation Strategy as an appendix (Pages 13 - 288)

Purpose

The purpose of this report is to seek approval to publish a consultation document on the draft Portsmouth Local Plan under Regulation 18 of the *Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)* and its proposed communications plan and budget.

RECOMMENDED that the Cabinet

1. Approve the Portsmouth draft Local Plan consultation document for at least 6 weeks of public consultation.

2. Approve the Local Plan consultation communications plan and suggested budget of £30,000.

3. Delegate authority to the Assistant Director of Planning and Economic Growth to modify and make editorial changes to the Portsmouth draft Local Plan consultation document, in consultation with the Cabinet Member for Planning Policy and City Development (if required).

5 Local Development Scheme update (Pages 289 - 312)

Purpose

To purpose of this report is to outline and seek approval for the revisions to the Local Plan timetable set out in the Local Development Scheme (LDS).

RECOMMENDED that the Cabinet

1. **Approve the revised Local Plan timetable set out in the Local Development Scheme (LDS). The revised LDS to have effect from 27th July 2021.**
2. **Grant delegated authority to Assistant Director Planning & Economic Growth to make minor amendments to the LDS and Development Plan Document timetables as necessary.**
3. **Note the progression of other Portsmouth Development Plan Documents and Supporting Planning Policy documents.**

6 Future of Waste Collection Services (Pages 313 - 336)

Purpose

To update the cabinet of the options for future waste collections in the city.

RECOMMENDED that the Cabinet

1. **Note the likely outcomes of the Environment Bill - in particular the requirement for a consistent set of materials to be collected.**
2. **Agree with the principle of the provision of a twin stream recycling collection system rather than a kerbside sort system, and delegate authority to the Director of Housing, Neighbourhoods and Building Services to develop a detailed plan for implementation of a twin stream collection service in the City. (Twin stream will require 2 recycling containers, kerbside sort will require 4 recycling containers, see 3.7).**
3. **Note that the delivery of a twin stream collection system is dependent on the outcomes of the Environment Bill, agreement by Waste Disposal partners on the provision of a Materials Recovery Facility (MRF) to enable twin stream collection, and agreement from other Hampshire waste collection authorities to deliver a twin stream collection service.**
4. **Note that a further report will be brought to Cabinet with the business case for the provision of the MRF later this year.**
5. **Agree a further report is brought to Cabinet for decision to agree a final specification for the twin stream collection service ahead of implementation.**

7 Household Waste Recycling Operations update and booking system (Pages 337 - 352)

Purpose

The purpose of this report is to provide Cabinet an update on operations at Portsmouth's Household Waste Recycling Centre (HWRC) in light of the Government's Roadmap towards the gradual relaxation of measures to control the COVID-19 pandemic. This includes provision to retain in the short-term the booking system that was successfully implemented during the pandemic.

RECOMMENDED that the Cabinet

1. **That the Cabinet approves the retention of the HWRC booking system until at least March 2022 to manage customer demand and**

facilitate continuation of a controlled and safe HWRC operation while visitor numbers are increased as, social distancing restrictions are reduced. This is in-line with our Waste Disposal Authority Partners Hampshire County Council and Southampton City Council.

2. That the Cabinet approves the reintroduction of access to cyclists on a controlled basis at Portsmouth HWRC, from July 2021, utilising the HWRC booking system.
3. That the Cabinet notes Hampshire County Council (HCC) have approved the commencement of the £5 charge for non-residents using Hampshire's 24 HWRCs from 1 September 2021. This decision will not impact residents of Portsmouth wishing to use Hampshire's sites because of the joint HWRC and disposal partnership arrangements we have in place with HCC. Hampshire residents will also not be impacted using Portsmouth HWRC. Portsmouth residents will be required to register their vehicle with HCC to use the Hampshire sites, but not if they only wish to use Portsmouth HWRC. Registration is free of charge for Portsmouth residents because of the reciprocal use agreement with HCC. The Portsmouth HWRC cross-border policy decision was made by the Cabinet Member for Environment & Community Safety on 05 February 2019 - [Household waste recycling centre cross border charging](#).
4. That the Cabinet notes that HCC has approved the removal of glass banks from Hampshire's 24 HWRCs from 1 July 2021 in line with the previously taken decisions, which were deferred during covid-19 restrictions. This decision will not impact Portsmouth HWRC, and PCC will retain the glass banks at the site because of separate glass collections arrangements we have in place with Biffa, the City Council's waste collections contractor.

8 2021 Annual Status Report of Air Quality (Pages 353 - 358)

Purpose

1. Local Air Quality Management (LAQM) process and the 2020 Review and Assessment (R&A) of air quality (AQ) in Portsmouth through the forthcoming publication of the 2021 Annual Status Report (ASR).
2. The impact of the Covid-19 pandemic upon the actions undertaken by Portsmouth City Council (PCC) to monitor air pollution levels in Portsmouth during 2020 and the provisional results of the monitoring undertaken during 2020.

9 Port Health Readiness - Delivery of Official Controls (Pages 359 - 366)

Purpose

To provide the Cabinet information on the:

1. Responsibilities of Regulatory Services as the Port Health Authority (PHA) in respect to delivering *official controls* on various food products entering the Portsmouth International Port (PIP) following the UK's exit from the EU.
2. Challenges faced by the PHA in respect to achieving operational border readiness in compliance with the UK Government's prescriptive timetable.

10 Annual Fostering Service Report (Pages 367 - 382)

Purpose

The report provides a summary of the work undertaken by the Fostering Service for the period 01/04/20-31/03/21.

11 Annual Adoption Report (Pages 383 - 396)

Purpose

The previous report was presented March 2020. This report will update the Lead Member on Portsmouth Adoption Service activity for the period 1 April 2020 to 31 March 2021.

12 Response to the interim report of the national independent review of children's social care; strategy for high quality social care and early help in Portsmouth (Pages 397 - 412)

Purpose

This paper provides information about the interim report of the national independent review of children's social care, published in June. It notes the broad stance on that report which it is proposed should be taken in a detailed response from the Lead Member for Children, Families and Education. It then updates Cabinet on progress and next steps with our own local strategy for even better, more affordable social care and early help for children, young people and families.

13 Heritage Strategy (Pages 413 - 458)

Purpose

The report seeks approval to start a wider consultation on a heritage strategy for Portsmouth.

RECOMMENDED that the Cabinet give approval for the draft heritage strategy to go out to consultation.

14 Outside Bodies - Consideration of any Recommendations Arising from the Scrutiny Management Panel held on 22 July 2021

Report to follow

15 Treasury Management Outturn Report 2021/2022 (Pages 459 - 470)

Purpose

To inform members and the wider community of the Council's treasury management activities in 2020/21 and of the Council's treasury management position as at 31 March 2021.

RECOMMENDED that the Cabinet

Note the actual prudential and treasury management indicators based on the unaudited accounts, as shown in Appendix B (an explanation of the prudential and treasury management indicators are is contained in Appendix C).

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Agenda Item 3

CABINET

RECORD OF DECISIONS of the meeting of the Cabinet held on Tuesday, 22 June 2021 at 12.00 pm at the Guildhall, Portsmouth

Present

Councillor Gerald Vernon-Jackson CBE (in the Chair)
Suzy Horton
Dave Ashmore
Kimberly Barrett
Ben Dowling
Hugh Mason
Darren Sanders
Lynne Stagg

42. Apologies for Absence (AI 1)

Councillors Chris Attwell and Jason Fazackarley sent their apologies.

43. Declarations of Interests (AI 2)

There were no declarations of interests.

44. Record of Previous Decision Meetings (AI 3)

The record of decisions from the previous Cabinet meetings held on 9 and 19 March 2021 were approved as correct records.

45. Clean Air Zones: Additional Exemptions and Sunset Periods (AI 4)

Deputations from the following people against recommendation 5 were read out:

- Sally Hedgecoe
- Lynsey Thompson
- David Blackman
- David Carr
- Rhona Djaelani
- Ben Magee
- Tracy Juby

Deputations can be viewed here: [Cabinet Meeting, 22 June 2021 on Livestream](#)

Hayley Trower, Air Quality Lead introduced the report which was widely supported.

Councillor Matt Atkins made a deputation against recommendation 5.

Members noted that the ministerial directive had been imposed on the council and they would have preferred measures to encourage people to take public transport however the government had refused their requests.

There is no equine hospital on the Isle of Wight, therefore it is important that an exemption for a limited number of trips be approved.

DECISIONS

Cabinet:

Approved a stop gap sunset period for non-compliant vehicles that have been unable to upgrade prior to CAZ Go Live, due to external factors outside of their control;

- 1. Approved a fee waiver for bus or coach services operating for the purposes of emergency rail or bus / coach replacement;**
- 2. Approved a 2 year sunset period for the provision of domestic refuse collection vehicles, operating to deliver statutory services within Portsmouth, until end of October 2023;**
- 3. Approved an exemption for up to 10 trips per year for horse transporters classed as heavy goods vehicles;**
- 4. Rejected the proposed exemption for motorhomes classified as private heavy goods vehicles;**
- 5. Rejected the proposed exemption for hybrid vehicles that do not meet the relevant euro standards for the CAZ; and**
- 6. Rejected the proposed exemption for pre-planned rail replacement services.**
- 7. Approved that for the reasons of making the Charging Order, Cabinet do not consider any further requests for exemptions or sunset periods for the Portsmouth CAZ.**

46. National Bus Strategy - Enhanced Partnership for Portsmouth (formal response) (AI 5)

Peter Shelley, Transport Development Officer introduced the report.

Members noted that Portsmouth has the lowest rate of bus use in the South East, 50% less than Southampton and 25% than Brighton and some of the highest prices in Hampshire. It is important that people use their cars less often to improve air quality and everyone's health.

The council has a good relationship with the bus companies and there are many plans to improve services. Portsmouth is one of only five areas in the country that First bus is bidding to introduce electric buses through the Zero Emission Bus Regional Areas fund.

Members were pleased that the government had invested in public transport but recognised that the denationalisation of the bus services had been a bad thing.

DECISIONS

Cabinet

- 1. Approved for Portsmouth City Council to establish an Enhanced Partnership with bus operators for Portsmouth and authorises the publication of the requisite statutory notice of the Council's intent in that regard.**

2. **Noted that the detailed Bus Service Improvement Plan (BSIP) required for submission by 31 October 2021 will be the subject of a further decision report.**

47. Local Transport Plan 4 (AI 6)

Pam Turton, Assistant Director, Transport, Regeneration introduced the report.

Councillor Stagg gave an overview of the plan and members thanked the officers for their hard work.

DECISION

Cabinet

1. **Approved the draft Portsmouth transport strategy and Portsmouth transport implementation plan for submission to Full Council for adoption as the Portsmouth Local Transport Plan 4 (LTP4) 2021-2038**
2. **Delegated authority to the Director of Regeneration in consultation with the Cabinet Member for Traffic and Transportation and the Section 151 Officer to agree any minor amendments to the strategy and implementation plan that may be required to take account of future funding and policy announcements**

48. Portsmouth International Port Harbour Revision Order (AI 7)

Mike Sellers, Port Director introduced the report.

DECISIONS

Cabinet agreed the following recommendations to be taken to Full Council:

1. **Approves an application being made to the Marine Management Organisation ("MMO") for a Harbour Revision Order ("HRO") for a full consolidation and modernisation of legislative powers; and**
2. **Delegates authority to the Port Director in consultation with the Port's Portfolio Holder and the Harbour Master to determine the wording of the HRO based on legal advice and undertake all procedures for the submission of the HRO to the MMO.**

49. Modern Slavery Transparency Statement (AI 8)

Lisa Wills, Strategy & Partnership Manager introduced the report.

DECISIONS

Cabinet approved:

1. **The Modern Slavery Transparency Statement for publication on the council's website (see appendix 1) and**
2. **The programme of work set out in item 5 of the report.**
3. **Full Council be asked to note the recommendations for information only.**

50. Sister City Links with Halifax, Canada and the Falkland Islands (AI 9)

Lydia Mellor, Events Manager introduced the report.

Councillor Matthew Atkins made a deputation in favour of the recommendation.

Members noted that it is expected that virtual meetings would be used to build the relationships and support these cities.

DECISION

Cabinet authorised officers to enable the City of Portsmouth to enter into Sister City relationships with the Halifax Regional Municipality, Canada and the Falkland Islands Government.

51. Appointments to Outside Organisations and Champion Appointments (AI 10)

A deputation from Councillor Claire Udy was read out in which she requested that the name of the LGBT+ Champion be changed to LGBTQ+.

Councillor Matthew Atkins made a deputation and asked that his group nominations on outside organisations and Member Champion be considered. He also requested that the traditional appointment method be applied for organisations that require two representatives with one Councillor from the main group and one from the largest opposition group.

The Leader explained that the creative industries had experienced a difficult year and council representatives with business experience were required this year to support them.

DECISIONS

The following appointments were made:

Motiv8 - Councillor Suzy Horton.

Education Advisory Board - Councillors Tom Coles, Terry Norton, Ryan Brent and Suzy Horton.

Elementary Education Act Trust Board - Councillors Terry Norton, Ryan Brent, Suzy Horton, Hugh Mason and Gerald Vernon-Jackson.

Aspex Visual Arts Trust - Councillor Chris Attwell

Baffins Community Association - Councillor Darren Sanders

Buckland Community Association - Jason Fazackarley and Leo Madden.

City of Portsmouth Sports Council - Councillors Scott Payer-Harris and Ben Dowling (1 vacancy).

Duke of Edinburgh Award Scheme - Hampshire Forum - Councillor Chris Attwell.

Eastney Area Community Association - Matthew Winnington

Farlington Marshes Management Committee - Councillors Ben Swann, Hugh Mason, Leo Madden (1 vacancy).

Fratton Community Association - Councillor Dave Fuller

Hampshire Archives Trust (Annual Meeting) - Museum & Visitors Services Manager.

International Boatbuilding Training College Portsmouth - Councillor Rob Wood.

Kings Theatre Trust Ltd - Councillors Hugh Mason and Rob Wood.

Landport Community Association - Councillor Claire Udy

Maritime Archaeology Trust - Councillor Kimberly Barrett

Mary Rose Trust - Councillors Linda Symes, Rob Wood and Frank Jonas.

Milton Village Community Association - Councillor Ben Dowling.

New Theatre Royal Trust - Councillor Will Purvis.

Overlord Embroidery Trust Liaison Committee - Councillors Linda Symes, Ben Dowling and Lynne Stagg

Paulsgrove Community Association - Councillor George Madgwick

Portsmouth Royal Dockyard Historical Trust - Councillor Rob Wood.

Stacey Community Centre Management Committee - Councillor Darren Sanders

Stamshaw & Tipner Community Centre Association - Councillor Lee Hunt

West Paulsgrove Scout & Community Association - Councillor George Madgwick

SCOPAC - Councillor Hugh Mason

LGA Coastal Issues Special Interest Group - Councillor Hugh Mason

Portchester Crematorium Joint Committee - Councillors Hugh Mason and Dave Ashmore.

Portsmouth Plastic Free Coastlines Steering Group - Councillor Kimberly Barrett

Portsmouth Integra Strategic Board - Councillor Dave Ashmore (deputy - vacancy)

Solent Sea Rescue Organisation - Councillor Lee Hunt

Southern Regional Flood & Coastal Committee - Councillor Hugh Mason and Councillor Dave Ashmore (deputy)

Trading Standards South East Limited - Councillor Stuart Brown

Lord Mayor's Coronation Homes Board - Lord Mayor

Portsmouth & District Friendly Society Homes - Councillors Gerald Vernon-Jackson, Ben Dowling and Cal Corkery

Fratton Big Local - Councillor Stuart Brown with Councillor Tom Coles (deputy)

Honor Waites Almshouses - Councillor Hugh Mason

Hampshire & Isle of Wight Local Government Association - Councillors Judith Smyth, Lee Mason, Matthew Atkins and Darren Sanders (deputy)

Improvement & Efficiency South East - Councillors Darren Sanders and Rob Wood (non-executive director)

Port Advisory Board - Councillors Claire Udy, Judith Smyth, Matthew Atkins, Ryan Brent, Kimberly Barrett, Hugh Mason and Gerald Vernon-Jackson (ex-officio post holder).

Portsmouth Naval Base Property Trust - Terry Hall and Steve Pitt

PUSH Joint Committee - Councillors Hugh Mason and Matthew Atkins (deputy)

PUSH Overview & Scrutiny - Councillor Judith Smyth and Ryan Brent (deputy)

SIGOMA - Lee Mason (1 vacancy)

St Thomas's Cathedral Council - Councillor Chris Attwell

Building Control Partnership - Councillor Hugh Mason

Hampshire Buildings Preservation Trust (Annual Meeting) - John Smith

Minerals and Waste Development Framework Members' Steering Group - Councillor Hugh Mason
PATCH Ltd - Councillors Cal Corkery, Chris Attwell and Ian Holder
Solent Forum - Councillor Hugh Mason
Tourism South East - Councillors Scott Payter-Harris and Ben Dowling
Haifa/ Portsmouth Friendship Committee - Councillors Lee Mason, Hugh Mason, Dave Ashmore, Matthew Atkins and Tom Coles.
South East Employers - Councillor Matthew Atkins (2 vacancies and 2 deputy vacancies)
National Parking Adjudication Service Management Committee - Councillor Lynne Stagg and Kevin McKee.
Bus Lane Adjudication Service Joint Committee - Councillors Lynne Stagg and Simon Boshier (deputy)
Solent Transport Joint Committee - Councillor Lynne Stagg
Transport Liaison Group - Councillors Graham Heaney, Lynne Stagg and Simon Boshier.
Portsmouth Adoption Panel - Councillor Lynne Stagg
Children's Trust Board - Councillors Suzy Horton, Rob Wood, Ryan Brent and Judith Smyth continue
Standing Advisory Council for Religious Education - Councillor Tom Coles
Hampshire Countryside Access Forum - Councillor Ben Swann
Portsmouth Fostering Panel - Councillor Jeanette Smith continues in that role.

The LGBT+ Champion will be renamed LGBTQ+ Champion

Appointments to the Shareholder Committee and the Member Champions appointments will be considered at the next Cabinet meeting.

The meeting concluded at 1:40pm

Councillor Gerald Vernon-Jackson CBE
Leader of the Council

Agenda Item 4



Portsmouth
CITY COUNCIL

Title of meeting:	Cabinet
Date of meeting:	27 th July 2021
Subject:	Draft Portsmouth Local Plan consultation
Report by:	Ian Maguire, Assistant Director of Planning and Economic Growth
Wards affected:	All
Key decision:	No
Full Council decision:	No

1. Purpose of report

- 1.1 The purpose of this report is to seek approval to publish a consultation document on the draft Portsmouth Local Plan under Regulation 18 of the *Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)* and its proposed communications plan and budget.

2. Recommendations

- 2.1 To approve the Portsmouth draft Local Plan consultation document for at least 6 weeks of public consultation.
- 2.2 To approve the Local Plan consultation communications plan and suggested budget of £30,000.
- 2.2 To delegate authority to the Assistant Director of Planning and Economic Growth to modify and make editorial changes to the Portsmouth draft Local Plan consultation document, in consultation with the Cabinet Member for Planning Policy and City Development (if required).

3. Background

- 3.1 The Council is preparing a new Local Plan for Portsmouth. This document will set out a planning strategy to meet future development needs in the city for the period to 2038. The Plan will set out details on the level of development that will need to take place in the city and where it will be located. It will contain planning policies to guide decision making on planning applications.
- 3.2 The process for producing the new Local Plan is set out in the *Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)*. Its content and scope will be tested on its consistency with the *National Planning Policy Framework*

(NPPF) and *National Planning Practice Guidance* (NPPGs) and the justification provided by the Plan's evidence base. A public examination process will consider the soundness of the Local Plan, and it must be found sound in order to be adopted by the Council. The new Portsmouth Local Plan, once adopted, will replace the policies from existing planning policy documents.

- 3.3 The first stage in the preparation of the new Local Plan, the *Issues and Options document* was published for consultation in August 2017, followed by an *Evidence Base Update consultation* and a consultation paper on the *Tipner Strategic Development Area* proposals in February 2019. The responses to these consultations have informed the development of this consultation draft of the new Local Plan, which is to be published as a 'preparation stage' (Regulation 18) consultation. The supporting evidence for the Plan has been further developed since the previous consultation, including the preparation of commissioned studies, engagement with neighbouring authorities and an updated appraisal of all potential development land in the city (including a 'call for sites'). The subsequent stages for the progression of the Plan through to adoption are set out in the Council's updated Local Development Scheme.

Portsmouth Local Plan ('Regulation 18') consultation draft

- 3.4 A consultation draft of the new Local Plan has been prepared (See Appendix A). It summarises the current evidence base to present the following:
- Draft Local Plan vision, objectives, key themes and a spatial development strategy.
 - Draft strategic policies to indicate where new development should, or shouldn't be located, including: areas for housing, employment and culture, leisure tourism development; a hierarchy of centres; protection of community uses and protection for networks of ecological importance, green infrastructure and open space/ recreation.
 - Draft development management policies that set out the proposed standards and criteria for new development; e.g. design, flooding, heritage, sustainable construction and health, pollution and amenity;
 - Proposed allocation of six strategic development sites to deliver the required development needs for the plan period; and
 - Three area allocations to provide a high-level framework to guide any future development proposals.
- 3.6 The proposed approach and draft policies in the Plan are a first draft for public consultation, and are expected to be subject to change as a result of the consultation and/or the progression of the plan. However, there are some aspects of the consultation document, such as some of the proposed development management policies, which will have more certainty in their proposed direction given either a lack of reasonable alternatives or their context within current national planning policy guidance. The consultation document includes a number of open



and closed questions to ascertain views on the proposed direction and content of the draft Plan and specific questions on key issues to help prompt and direct discussion.

- 3.7 The publication of the consultation document will be accompanied an independent Habitat Regulation Assessment (HRA), Sustainability Appraisal, a viability appraisal and transport assessment of the Plan's proposals, plus a range of supporting evidence topic papers - all of which can be commented upon as part of the consultation.

Local Plan consultation - communications plan

- 3.8 A consultation and engagement strategy for the consultation document has been developed with Corporate Communications (See Appendix B), who will continue to have input on the wording, style and presentation of the Local Plan consultation questions ahead of publication.
- 3.9 The communications plan has a proposed budget of £30,000 which reflects the need to encourage engagement at this key stage in the preparation of the draft Plan where comments have a greater opportunity to influence the form and direction of the Local Plan, whereas the latter stages of consultation on the Plan will be more focused on legal compliance.
- 3.10 Promotion is proposed to be through a mix of print, digital and in-person engagement; featuring an online consultation space with multimedia functionality, a city-wide leaflet drop and drop-in sessions with Officers and display boards. This would be supported by social media and website promotion with a phone line available for those who cannot engage through other methods.
- 3.11 If approved, the virtual consultation room would be hosted by Arup who can offer a customisable space for the Portsmouth Local Plan consultation where all proposals/ documents can be browsed and commented upon¹.

4. Reasons for recommendations

- 4.1 As the Local Planning Authority, the Council is required to publish a consultation document on the proposed direction of the draft Portsmouth Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and in-line with the timetable in Council's Local Development Scheme.
- 4.2 Consultation plan with a range of engagement methods is proposed with a budget of £30,000 to encourage maximum participation at the stage of plan preparation, where the public have a greater opportunity to influence the form and direction of the Local Plan.

¹ An example of a virtual consultation room can be viewed at: <https://virtualengage.arup.com/smartsustainablecities/>



5. Integrated impact assessment

5.1 An integrated impact assessment is not required as the recommendations do not directly impact on service or policy delivery at this stage. While the Regulation 18 consultation document seeks comments on draft proposals that feature a range of environment, social and economic related issues and impacts, an Assessment will be undertaken for the 'Regulation 19' stage consultation which will present the proposed Submission version of the Plan for consultation.

6. Legal implications

6.1 The legal requirements for the preparation and consultation of the Local Plan are set out in Planning and Compulsory Purchase Act 2004 (as amended) ("PCPA 2004") and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("The LPR 2012"). The Council must carry out consultation on the draft local plan in accordance with regulation 18 of The LPR 2012 and take into account representations made in response to the consultation.

6.2 Under S.19 PCPA 2004 and as per the Environmental Assessment of Plans and Programmes Regulations 2004 there is a requirement that a local plans is subject to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Habitat Regulations Assessment of the local plan is required under the Conservation of Habitats and Species Regulations 2017. A Sustainability Appraisal and Habitat Regulations Assessment will be published alongside the Local Plan Regulation 18 consultation documents.

7. Director of Finance's comments

7.1 With the exception of the approval of the £30,000 for the local plan consultation here are no direct financial implications as a result approving the recommendations within this report, this cost will be met from cash limited resources.

7.2 The remainder of the costs associated with the development of the Local Plan will also be met from the Cash limited resources.

.....
Signed by:

Appendices:

Appendix A: Portsmouth Local Plan Regulation 18 draft for consultation

Appendix B: Local Plan consultation - communications plan

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

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

Title of document	Location

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by on

.....
Signed by:

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Portsmouth Local Plan 2038

'Regulation 18' Consultation Document



Draft for consultation
August 2021

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i - Introduction

i.i What is the Portsmouth Local Plan?

- i.i.i The Portsmouth Local Plan is a framework for delivering the aspirations and development needs of the city over a 15-year period. The Local Plan will seek to guide the sustainable development of Portsmouth and address social, economic and environment issues through decisions on the built environment and land use.
- i.i.ii The Local Plan will shape future development in the city by indicating what type of development can happen and where (e.g. how many new homes will be built and where they will be located), including protection for particular areas from inappropriate development (including open space or historic conservation areas). The Local Plan's policies will apply to all new development and changes of use requiring planning permission, ranging from change of use to a to a major housing scheme.
- i.i.iii The Local Plan also provides a framework for investment in the city, by both the Council and other public and private sector investors. It complements other actions the Council takes in its role as provider of public services and as a major landowner, investor and community leader in Portsmouth.
- i.i.iv The direction of the Local Plan has to be consistent with planning legislation and policy guidance set out by the Government, including the National Planning Policy Framework (NPPF) and associated National Planning Policy Guidance (NPPG). The content of the Local Plan is shaped by engagement with communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The Council also co-operates extensively with neighbouring authorities, through the Partnership for South Hampshire (PfSH), on cross-boundary planning issues (e.g. the distribution of housing need and natural resource use) and with other Local Authorities in Hampshire and beyond.
- i.i.v Once formally 'adopted' by the Council, the new Local Plan for Portsmouth will replace the policies in the existing Portsmouth Development Plan Documents and form the primary basis for making decisions on planning applications in the city..
- i.i.vi Portsmouth residents may choose to prepare a specific Neighbourhood Plan for their area, in conformity with the Portsmouth Local Plan. Neighbourhood Plans, once adopted, will also form part of the city's overall development plan framework.

Other Plans and Strategies

- i.i.vii The Local Plan will address the key development issues for Portsmouth alongside a number of other key Council strategies. The Council is also preparing a new *Local Transport Plan* and *Air Quality Local Plan* for the city. The *Local Transport Plan 4* (LTP4) will set out how the transport challenges within both Portsmouth and the wider South Hampshire sub-region will be addressed through

infrastructure improvements and other measures. The *Air Quality Local Plan*, produced with input from Government's Joint Air Quality Unit (JAQU), sets out the proposed approach to achieving compliance with legal limits for Nitrogen Dioxide (NO₂) at all locations city-wide to ensure a healthier environment for all. The Portsmouth Local Plan has been developed in conjunction with these documents.

- i.i.viii Responding the challenges of sustainable development, improving air quality, tackling climate change and enhancing the health and well-being of all residents are key priorities for the Council, and have been considered at the heart of the approach to the draft Local Plan.

i.ii Preparing the Draft Portsmouth Local Plan

- i.ii.i The existing planning policy framework for Portsmouth is provided by *The Portsmouth Plan Core Strategy* adopted in January 2012, saved policies from the *Portsmouth City Local Plan* (2006), the *Hampshire Minerals and Waste Plan*, Area Action Plans for Somerstown and North Southsea (2012) and Southsea Town Centre (2007) and a number of Supplementary Planning Documents on range of issues¹.
- i.ii.ii The preparation of the new Local Plan involves identifying the key issues for the sustainable development of Portsmouth, assessing the future needs and opportunities, exploring and identifying options, and setting out a preferred approach. This process involves gathering evidence, meaningful engagement and consultation with the public and key stakeholders and on-going assessment of potential social, economic and environmental impact of plan proposals (including Sustainability Appraisal, Habitat Regulations Assessment, Health Impact Assessment and Equalities Impact Assessment).
- i.ii.iii The Council published the first stage in the development of the new Local Plan, the *Issues and Options* document in August 2017, followed by an *Evidence Base Update* consultation in February 2019, the responses to which have informed the development of this document.

¹ All Development Plan documents are available online at: <https://www.portsmouth.gov.uk/ext/development-and-planning/planning-policy/the-local-plan>

Table 1 - New Portsmouth Plan Preparation

Development Stage ²	Description / Document	Date	
Preparation ('Reg. 18')	Formal opportunities for the public and key consultees to influence the development and the content of the Plan	<i>Issues and Options consultation</i>	July 2017
		<i>Evidence base update consultation</i>	February 2019
		draft Local Plan Consultation	Summer 2021
Publication ('Reg. 19')	The 'final draft' of the Plan that the Council intend to submit to for Examination, published for consultation.	Winter 2021	
Submission ('Reg. 22')	Submission of Plan to Secretary of State. The 'Examination' of the Local Plan starts at this point; a Planning Inspector will assess whether the Local Plan has been prepared in-line with the relevant legal requirements and whether it meets the tests of 'soundness'. Consultees will be notified.	Spring 2022	
Examination hearings ('Reg. 24')	Examination of the Plan by an appointed Inspector. The hearings are public discussions where the Inspector explores the issues raised by the plan and the written and verbal representations.	tbc	
Inspectors report ('Reg. 25')	Inspectors Report on whether the plan is legally compliant and sound. It also sets out any changes the Inspector recommends in order for the plan to be found sound.	tbc	
Adoption ('Reg. 26')	Formal adoption of the plan by the council	End of 2022	

- i.ii.iv This draft Local Plan contains the Council's draft vision and objectives for the development of the city up to 2038, and the proposed approach to strategic planning issues and development management in Portsmouth. All representations received in relation to this document will be considered for the preparation of the Publication version of the Plan for submission to Government.
- i.ii.v The submitted Local Plan must be found to be:
- a) Positively prepared: providing a strategy seeks to meet the area's objectively assessed growth needs (as a minimum) including agreements with other authorities;
 - b) Justified: an appropriate strategy based on proportionate evidence;
 - c) Effective: deliverable over the plan period; and
 - d) Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- i.ii.vi A number of evidence documents³ have been prepared to support the preparation of the Local Plan and the proposals in this draft document. These include:
- Background evidence papers on a range of key planning topics
 - A Sustainability Appraisal and Habitat Regulations Assessment of the draft Plan proposals.
 - Viability Appraisal
 - Transport modelling
- i.ii.vii Comments are invited on the draft Local Plan and all supporting documents.

² The development stages of the Local Plan are set out by *The Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended).

³ See full list of evidence documents from: <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/the-local-plan/>

i.iii Planning Policy Changes and the Global Pandemic

Covid-19 Pandemic

- i.iii.i Coronavirus (Covid-19) was first reported in China in December 2019 and was declared a pandemic in March 2020. The background evidence for this document was largely prepared and updated between 2018 and 2020. The global Covid-19 pandemic has resulted in rapid social change and an economic shock, with on-going impacts on businesses, economy and society. The potential impacts over the long term are not yet fully known. There could be potential implications for the extent and type of growth expected within the plan period for the city, as well as a possible shift what it is felt that the aspirations and priorities should be for the future of Portsmouth.
- i.iii.ii Town planning as a discipline evolved from the need for good public health amid poor housing conditions in urban communities of the 19th Century. The pandemic has clearly shown and reinforced the links between health, the built environment and place. In some cases, the pandemic has also highlighted the inequalities in the quality of home environments, the relative accessibility to open spaces and key services and the overall influence of these factors on our health, well-being and resilience. However, even out of this terrible crisis there are opportunities and a glimpse of a different future for the city. Portsmouth has seen a significant shift in travel pattern and how people move around the city during 2020/21; during the first lockdown the use of motorised traffic in the city decreased to as low as 34% of pre-lockdown levels and cycling levels are thought to have dramatically increased (to as much as 156% compared to 2019⁴). The continued need for home-working has reduced traffic on major routes and for some the change in working patterns has also helped to incorporate local walking and cycling in in their daily routine where this was not previously possible.

Changes to the Planning System and Planning Policy Guidance

- i.iii.iii For some time the Government has been signaling its intention to make radical changes to the planning system in England. In response to the pandemic, there have been some reactive changes (such as allowing pubs to offer hot food takeaway services) other changes brought forward with the aim of simulating economic recovery (e.g. expansions to permitted development rights for new homes⁵).
- i.iii.iv One of the most significant changes for planning in Portsmouth was an amendment⁶ to how uses of land and buildings are grouped together for planning purposes, known as 'Use Classes'. A New E Class category allows for what are

⁴PCC (2021) *Local Transport Plan 4*

⁵ Demolition of buildings and their replacement with new housing (SI 2020/756) and upward extensions to residential properties (SI 2020/755) for applicable development

⁶ *The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020*

considered to be largely 'town centre uses' (Commercial, Business and Service Uses⁷) to be interchangeable, without the need for planning permission. This is accompanied by a new F Class for Local Community⁸ and Learning⁹ Uses. Drinking establishments and hot food takeaways now fall into a 'Sui Generis' ('other' uses that do not fall into any other Class) and will therefore still require planning permission.

- i.iii.v At the time of preparing this draft Plan, national planning guidance had not been updated to reflect the changes to the Use Class order; presently local authorities are required to plan for retail, leisure, office space needs (and other 'main town centre uses') and make allocations accordingly. The draft Plan reflects the amended Use Class where possible but to some extent relies on an evidence base that assumed a greater ability to manage and control the provision of these uses. As changes within a Use Class category generally do not constitute 'development', the policies in this Plan will not be able to apply to such changes of use. However, existing planning conditions regulating the use of the property will still apply, and physical changes may still require full planning permission (which could be granted with their own restrictive conditions). Property law constraints such as restrictive covenants and terms of lease also still apply.
- i.iii.vi In August 2020, the Government published the *Changes to the Current Planning System*¹⁰ consultation, which proposed changes to the standard method for calculating housing need as a 'starting point' for wider reform. A revised *Standard Methodology* followed (December 2020) which confirmed that Portsmouth's target housing would remain as per the previous *Standard Methodology* (2018) figure (see *Chapter 2: Housing*), instead directing an additional level of growth (a 35% uplift) to England's 20 most populated cities and urban centres, including Southampton. In the event that this has any wider implications across south Hampshire, Portsmouth will continue to work together with the other PFSH authorities on the distribution of housing need in the sub-region.
- i.iii.vii Published in parallel with the proposed changes to the current system was the *Planning for the Future White Paper*¹¹, which proposed a wide range of potential reforms aimed at streamlining the existing planning system, including proposals for new and consolidated fast track routes to permissions and further expansions to permitted development rights.
- i.iii.viii The Brexit transition period ended on 1st January 2021, marking the end of the free movement of people and goods and services between the UK and the EU.

⁷ Class E uses: shops, financial and professional services, cafes, offices, research and development, industrial, clinics and health centres, day centres and gyms.

⁸ F2: Community meetings places, outdoor sport and recreation, swimming pools and ice rinks and local shops

⁹ F1: Education, museums, libraries, public halls, places of worship and law courts.

¹⁰ MHCLG (Aug 2020) *Changes to the Current Planning System* consultation
<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

¹¹ MHCLG (Aug 2020) *Planning for the Future* consultation
<https://www.gov.uk/government/consultations/planning-for-the-future>

Whilst the UK is still facing restrictions relating to the Covid-19 pandemic, the full impact on Portsmouth International Port's capacity, needs and space requirements and the city's infrastructure may yet to be seen. The International Port is developing a new Masterplan that will consider these issues and as well as the potential requirements for its confirmed status a part of a Solent Freeport (March 2021).

Implications for the draft Local Plan

- i.iii.ix This initial draft of the new Portsmouth Local Plan has been prepared with the expectation of progressing under the current planning system. To reflect the recent changes, uncertainty and potential for further change in social and economic conditions, areas of uncertainty have been highlighted where appropriate. The evidence base will continue to be further refined where possible as the Plan progresses, shaped by public consultation, emerging information and in light of any new planning legislation and guidance. The new Portsmouth Local Plan, and future reviews of the Plan, will continue to seek to support and enable opportunities for growth and recovery while balancing the competing priorities for land use within the city.
- i.iii.x In Portsmouth we had a glimpse of the environmental improvements that a low emissions future could provide, following the initial rapid reduction in vehicles trips and the increase in active travel. The draft Local Plan proposes to continue to move towards such a future by:
- Continuing to direct new development to key centres and prioritising walking, cycling and public transport to help people to choose to travel less by car, while still accessing what they need day to day.
 - Ensuring development supports optimal health and well-being through good design, enforcing minimum space standards (tackling overcrowding) with access to green space.
 - Encouraging high quality sustainable development that maximises opportunities for fabric efficiencies and the uptake of low and zero carbon technologies to power our homes and vehicles.
- i.iii.xi This consultation document includes questions to seek views on how the city should respond to these issues.

i.iv How to comment on the draft Plan

- i.iv.i The consultation on this document and the accompanying supporting material runs from XX to XX. All the documents are on the Council's website. *Paper copies of this document are available to view at xxxx.*
- i.iv.ii This document is accompanied by a series of questions about the Plan's draft proposals. You don't need to answer all questions.
- i.iv.iii If you would like to make comments on the contents of this document please complete the online questionnaire or submit your response by email or letter.
- i.iv.iv All comments received in this consultation will be considered in the next stage of the project, the preparation of the final 'submission' draft of the Local Plan.

Online at: link

Email: planningpolicy@portsmouthcc.gov.uk

By post:

Planning Policy, Regeneration

Portsmouth City Council

Civic Office, Guildhall Square

Portsmouth PO1 2AU

- i.iv.v If you have further queries about this document please contact using the contact details above, or phone #####.

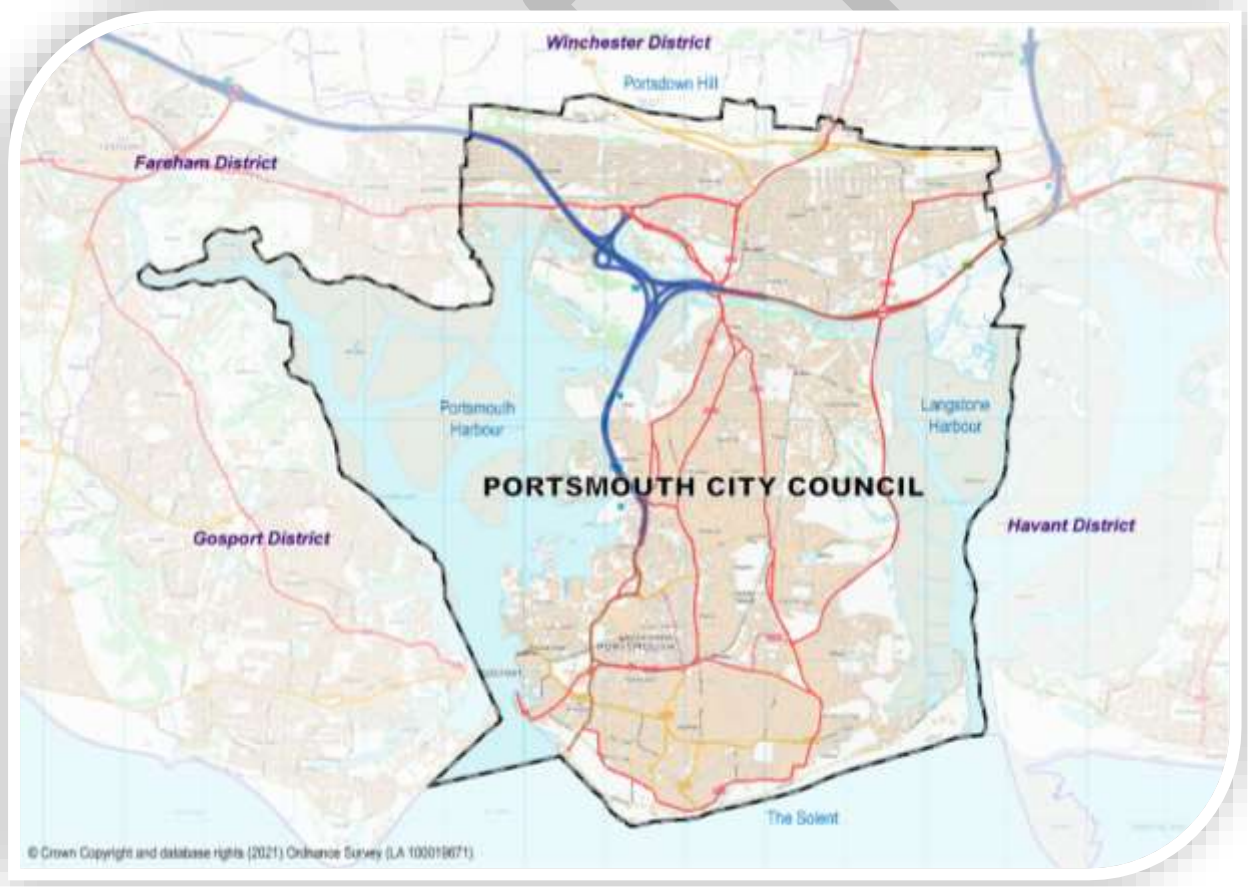
1 - Portsmouth's Strategic Development Strategy

1.1 Portsmouth Profile

Portsmouth: the island city

- 1.1.1 Portsmouth is located on the south coast of England. The Portsmouth City unitary authority area covers whole of Portsea Island and a wider suburban area of the mainland from Paulsgrove to Farlington. It is bordered by Portsdown Hill to the north, surrounded by the Solent to the south and set between Langstone and Portsmouth Harbours to the east and west respectively. Figure 1 shows the City of Portsmouth and the neighbouring Boroughs and Districts of Gosport, Fareham, Havant and Winchester.

Figure 1. The City of Portsmouth



- 1.1.2 Portsmouth's growth and character has been influenced and shaped over time by its geographical location and relationship to the sea. Today the City of Portsmouth covers only 40.1 sq. km with a population density higher than some areas of London, with a growing population of 214,905 (as of 2019). The city currently has

a relatively young population, as typically found in cities and which is boosted by student population attending the University of Portsmouth.

- 1.1.3 Portsmouth has the title of being the UK's only 'island city' (in the main) and is very flat and low lying. The city is characterised by rows of artisan terraces set out in a grid pattern, originally built to house the dockyard workers and seafarers' families. Over time, the western side of the city has become more dominated by commercial development and infrastructure with the city centre, dockyard, continental ferry port and the motorway (M275). The eastern side of the city has larger open spaces looking over Langstone Harbour with less densely developed residential areas and industrial estates. The southern part of the city is defined by its seafront, historic fortifications and Victorian residential development. The northern extent of the city lies on the mainland and is characterised by residential areas with larger semi-detached housing dating from the 1930s. Portsmouth 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.
- 1.1.4 Portsmouth, despite its dense urban environment and industrial heritage, benefits from feature 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 can cumulatively disturb and pollute these environments, potentially affecting key species and the quality of the water environment in the Solent.
- 1.1.5 Portsmouth's association with the Royal Naval stretches back almost a thousand years. The legacy of this is some of the greatest concentrations of historic military architecture in Europe, not only in the number of Grade I and II* Listed Buildings found within the Historic Dockyard, but also in the diverse range of Listed and Scheduled forts and castles that ring the city. Today Portsmouth is still Her Majesty's (HM) Naval Base for almost two thirds of the Navy's surface ships. The city's maritime heritage and historic waterfront, as well as its literary associations¹², has fostered a range of tourist attractions, including the Historic Dockyard (home of The Mary Rose, HMS Victory and HMS Warrior), the D Day Story, Charles Dickens Museum, Gunwharf Quays designer retail outlet and the iconic Spinnaker Tower. There have also been more recent enhancements to the historic environment, including the Hot Walls art studios in Old Portsmouth, a creative re-use of part of the original military seafront defences.

¹² The birthplace of Charles Dickens and home at one time to number of Britain's renowned writers including H.G. Wells, Sir Arthur Conan Doyle, Rudyard Kipling and Neville Shute.

- 1.1.6 In the early 19th Century, the southern part of Portsea Island (Southsea) began to develop as a picturesque satellite settlement with miles of seafront promenade and common. The city's other registered historic parks were established in this era; Victoria Park in the City Centre (1878) and Kingston Cemetery in North End (1856). While Fratton Park in Milton (1898), constructed late in this period, is still home to Portsmouth Football Club today. Many of the city's 23 Conservation Areas protect Victorian and Georgian features stemming from this period.
- 1.1.7 Moving into the 20th Century, Portsmouth was one of the most heavily bombed cities in Britain during the Second World War, destroying over 6,000 buildings and damaging many more. Gradual clearance of the worst affected areas, and their subsequent reconstruction, took place between the late 1940s and 1970s in the form of Portsmouth City Council housing estates in Paulsgrove, Landport, Somerstown, Buckland and Portsea, as well as the development of Leigh Park in Havant. Today Portsmouth has a total housing stock of 89,800 homes within the city (May 2021). This consists of 52,882 (58.9%) owner occupied homes, 19,738 (22%) privately rented, 10,080 (11.2%) are Council rented and 7,100 (7.9%) are Housing Association homes.
- 1.1.8 Portsmouth International Port opened in 1976; it is England's largest municipal port, with the commercial quay serving over 300 ships per year and total imports and exports of 985,000 tonnes in 2019. It deals with over 2 million passengers and 600,000 vehicles a year and is the second busiest cross-channel ferry port. A new terminal opened in 2011, helping to increase attractiveness of the Port as a cruise ship destination.
- 1.1.9 Today much of the city's key sectors in defence, aerospace, advanced manufacturing and technology, and as well as the tourism, digital and creative industries, stem from the city's marine and maritime legacy. These activities are supported and strengthened by links to The University of Portsmouth, an award winning, world-class university, which has recently received international acclaim for its enzyme-enabled solutions for the circular recycling of plastics. The University plays a key role in supporting local businesses and in contributing to the vibrancy of life in the city. Portsmouth has more acute health inequalities and lower life expectancies than surrounding areas. City-wide, the life expectancy at birth for both males (78.4 years) and females (82 years) is lower than both the average for the South East region (80.7/ 84.1 years) and for England (79.6/ 83.2 years). In Portsmouth there are also large inequalities for life expectancy at birth between different parts of the city, with males in areas of higher deprivation dying 9.5 years earlier than those in the city's least deprived areas and 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, identifying a number of areas in which the health outcomes for residents in Portsmouth are poorer than the

national average; including excess weight in adults and children, male and female life expectancy from birth, premature deaths from cardiovascular disease and cancers, smoking prevalence in adults and smoking related deaths, as well as the numbers killed and seriously injured on roads. The data provided by the JSNA is used to identify priorities for health and well-being in the city which are reflected in the *Portsmouth Health and Wellbeing Strategy 2018-2021*.

- 1.1.10 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, one of the main pollutants that can impact on human health are the products of combustion from road traffic – mainly nitrogen dioxide. The Government has imposed a Ministerial Direction on the City Council to produce a Local Air Quality Plan to demonstrate that actions will be taken to reduce levels of nitrogen dioxide in order to comply with at least legal limit value in the shortest possible time. There are currently five Air Quality Management Areas (AQMAs) predicted to exceed the annual nitrogen dioxide National Air Quality Objective (NAQO). The Council is working closely with Government's Joint Air Quality Unit (JAQU) to develop a Local Air Quality Plan, the outline business case for which has now been submitted to Government for review.
- 1.1.11 Reducing harmful emissions will be a key part of supporting the Council's *Climate Change Emergency Declaration*, as well as to meet our responsibilities as part of the UK's commitments under the *Climate Change Act 2008* (as amended). New development will have an impact on the environment throughout its lifetime and will need to be constructed to be resilient against the impacts of climate change that are predicted to occur over the next 100 years.
- 1.1.12 The challenge for the Portsmouth Local Plan is to balance the conflicting and competing issues and development needs, within the context of Portsmouth's unique constraints and opportunities, in order to plan for the long-term sustainable development of the city.

Portsmouth as a part of Hampshire and the South East

- 1.1.13 Planning for the future development of Portsmouth is considered in a much wider context than just the boundaries of the city, in part due to its geographical constraints as a coastal city. While the Council can only make decisions on planning applications that fall within the Authority Area, development in Portsmouth can have wider impacts across the sub-region, and equally development in south Hampshire can affect Portsmouth. Interconnections with wider area include:
- The **local housing market**: Portsmouth forms part of a wider housing market sub area (Portsmouth, Gosport, Havant, the eastern wards of Fareham Borough and the southern parts of Winchester and East Hampshire Districts) within which evidence suggests people move home to live and work.

- **Labour market:** the area within which commuters travel to work and the area businesses consider to look for the skills, services and infrastructure they need.
- **Leisure activities:** the city has a wider draw as a major cultural, commercial and tourism centre for the sub region.
- **Transport networks:** large volumes of people and goods flow in and out of the city every day, via road, rail, ferry services, cycle routes, the Port and other import wharves.
- **Environmental networks:** as a result of its activities the city has an environmental impact which goes beyond the city boundaries, and is in turn is affected by development and activity in other areas. This includes potential impact of traffic in and out of the city, the supply, treatment and disposal of water, and the pressure on the open spaces for development both within the city and in the surrounding countryside.

1.1.14 Planning for such the cross boundary strategic planning matters requires effective co-operation with other local authorities, statutory agencies and other key stakeholders. The main mechanism for this is through Portsmouth's membership of the *Partnership for South Hampshire* (PfSH), a grouping of local authorities¹³ working together to support the sustainable economic growth of the sub region, in collaboration with the *Solent Local Enterprise Partnership* (LEP).

1.1.15 The PfSH *Spatial Position Statement* (published in June 2016) forms a significant part of the statutory 'Duty to Co-operate'¹⁴ that Councils have with each other. The Position Statement addresses cross boundary issues concerning the distribution of future development in South Hampshire and represents an agreed approach; it includes a major development locations and the infrastructure needed to support sustainable growth. The Position Statement and its evidence base are in the process of being reviewed and updated by the PfSH authorities.

¹³ Hampshire County Council, the unitary authorities of Portsmouth, Southampton and the District/ Borough Authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, Test Valley and Winchester.

¹⁴ Localism Act 2011, S.110.

1.2 Draft Vision, Objectives & Key Themes

The Vision

- 1.2.1 A vision for the future of the city was developed through the *Imagine Portsmouth* 2040 project, with input from local agencies, businesses and residents during 2019/20 and was adopted by the Council in 2021.
- 1.2.2 In 2040 Portsmouth is 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.
- 1.2.3 Portsmouth people will have strong beliefs and values:
- **We believe in our community:** we will be so proud of our strong and friendly community spirit, how we all take care of each other, keep each other safe, help each other out, and make sure we all feel we belong
 - **We believe in collaboration:** we will all take responsibility for our city and we enjoy working together for the common good, across neighbourhoods, communities, organisations, sectors and businesses
 - **We believe in equality:** we will be a fair and equal city where everyone has the opportunity to succeed, enjoy and thrive in the life they want to live, and so we welcome and support each other without discrimination
 - **We believe in respect:** in 2040 we know every person in Portsmouth has a valuable contribution to make, whether we live, work, study or visit here, so we respect each other's differences, and make sure everyone feels included and safe
 - **We believe in innovation:** we are ambitious and action-oriented, welcoming new ideas and embracing changes that improve people's lives

Strategic Objectives

- 1.2.4 The Council's *2040 Vision* also forms the basis for the draft Local Plan's key objectives, which closely reflect the topics of the draft objectives previously consulted for the preparation of the new Local Plan. The objectives will help to achieve the Plan's vision by setting the context and direction for the approach of the draft Local Plan's policies.

A healthy and happy city: The Local Plan will supporting the optimal health and wellbeing of residents through a delivering a high quality place making, including access to local green space and employment opportunities, and cleaner air.

A city rich in culture and creativity: The Local Plan will protect and enhance its world-class historic assets and tourism attractions and provide the foundations for a thriving arts and cultural scene.

A city with a thriving economy | A city of lifelong learning:

The Local Plan will enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all.

A green city:

The Local Plan will protect and enhance biodiversity, open space and green infrastructure coverage and promote sustainable transport networks. It will seeks to improved air quality and mitigate and adapt to the likely impacts of climate change by directing development to the most sustainable locations and requiring high quality sustainable design.

A city with easy travel:

The Local Plan will help to deliver sustainable transport and infrastructure network by ensuring new development prioritises walking and cycling and public transport

- 1.2.5 There will be other delivery mechanisms and projects outside of the direct scope of the Local Plan that will also contribute to achieving the vision for the future of the city.

Question 1. Vision and Objectives

- a. Do you agree with the use of the *Imagine Portsmouth* draft vision and objectives to lead the new Local Plan?
- b. If you disagree, what changes would you suggest and why?

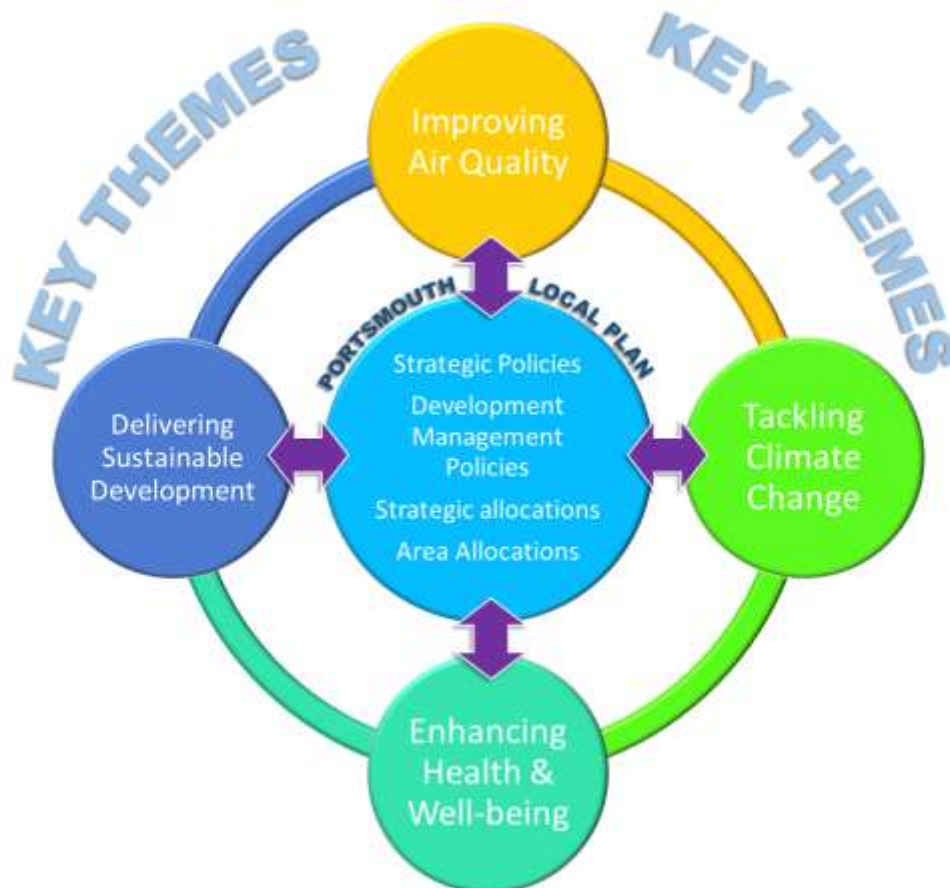
Local Plan Key themes

Underlying the approach to the new Local Plan are number of interlinked key themes. These are:

- Delivering Sustainable Development
- Improving Air Quality
- Tackling Climate Change
- Enhancing Health & Well-being

These issues are central to good planning and achieving the vision and objectives for the future of Portsmouth. They cannot be addressed by tackling a single issue or through implementing a single policy. The key themes are therefore addressed, directly and indirectly, across the draft proposals for the new Local Plan as a whole. The new Local Plan, alongside other key Council strategies, will have a key role to play in tackling these wider issues.

Figure 2. Local Plan Key Themes



Question 2. Local Plan Key Themes

- a. Do you agree with the proposed key themes?
- b. If you disagree, what changes would you suggest and why?

1.3 Draft Development Strategy

Figure 3. Key Diagram



- 1.3.1 The proposed Spatial Development Strategy for the new Local Plan, directed by the Local Plan's vision and objectives, seeks to guide the future location, pattern, and form of development in Portsmouth. The Development Strategy will set the context and direction for the Plan's strategic policies. The Spatial Strategy indicates where development is deemed acceptable *in principle*, as well as where it is not. See *Figure 3. Key Diagram*.
- 1.3.2 The approach to future land use has been shaped by Portsmouth's island geography, historical patterns of land use and the aspirations for the future development of the city. Balancing the conflicting and competing needs, within the space constraints of the city, is a key challenge for the new Local Plan.
- 1.3.3 The spatial approach to the city's growth needs is guided by the following draft key principles:
- Directing substantial new development to key locations that are accessible to active and sustainable transport networks and key services.
 - Protecting the city's areas of open space, parks, coastal areas and identified habitat areas where possible: including Southsea Common, Milton Common, Great Salterns, Hilsea Lines, Portsdown Hill and Farlington Marshes.
 - Avoiding the areas of highest flood risk for the lifetime of new development and taking into account the projected sea level rise and flood risk due to climate change.
 - Increasing the amount and density of new residential development in the most accessible areas of the city.
 - Protecting the city's existing employment estates from alternative development (where planning permission is required).
 - Focusing new and enhanced commercial, leisure, tourism and community uses in town centre areas and key tourism destinations.
 - Taking account of the city's 25 Conservation Areas and numerous Listed Buildings, Scheduled Ancient Monuments and Historic Parks and Gardens.
- 1.3.4 The Council has conducted an appraisal of land¹⁵ for development and its estimated delivery potential during the plan period in view of these principles, which will continue to be reviewed annually.
- 1.3.5 As the preparation of the Local Plan progress, it will include a delivery strategy for the 2020 to 2038 period that sets out the level of provision for the city's growth needs, including the number of new homes, targets for new and regenerated employment floorspace, commercial and service use floorspace and new education provision. The growth needs for the plan period will be allocated by the Plan's strategic policies, supported by a number of site specific and development management policies.

¹⁵ PCC (2021) *Housing and Economic Land Availability Assessment*

- 1.3.6 A draft *Local Plan Policies Map* (Appendix A) will show all the proposed land use designations and site allocations.

Question 3. Spatial Development Strategy

- a. Do you agree with the approach to the proposed Spatial Development Strategy for the new Local Plan?
- b. If you disagree, what changes would you suggest and why?

1.4 Monitoring and Implementation

- 1.4.1 Every draft policy in the Plan includes information on how the policy's aims are proposed to be monitored. The implementation and effectiveness of the Local Plan's policies will be monitored annually through the Council's Authority Monitoring Report (AMR). This will include data on planning permissions and development completions as well as other key indicator information.
- 1.4.2 The draft policies have been prepared with the aim of being resilient to change and uncertainty during the plan period. However, the conclusions of the AMR may be used to determine whether any early review of the Plan's policies is necessary. It is now a legal requirement that all local plans are reviewed at least every five years to consider whether policies remain effective¹⁶.
- 1.4.3 The evidence base on key strategic planning issues will continue to be kept up to date once the Plan is adopted, including through the Council's annual *Housing and Economic Land Availability Assessment* (HELAA) and *Housing Delivery Test* (HDT) output, as well as through on-going work on a revised *Spatial Position Statement* on cross boundary matters with other local authorities in south Hampshire.

¹⁶ *Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended), S.10A.

2 - Housing

Delivering housing to meet the needs of a growing city is a key requirement for the new Local Plan. This chapter sets how much, and what type of housing can be delivered within the city to meet identified needs, and sets out proposals for how it may be achieved.

Portsmouth currently has a total housing stock of 89,800 homes (as of May 2021); of these 52,882 (58.9%) are owner occupied, 19,738 (22%) are private rented, 10,080 (11.2%) are Council rented and 7,100 (7.9%) are Housing Association homes.

2.1 Housing Need and Supply (Policy H1)

Housing Need

- 2.1.1 The Government's aim is to significantly boost the supply of new homes in order to address the country's growing and ageing population as well as the existing deficiency from past undersupply of suitable homes. To do this, Councils are expected to meet the Government's minimum target housing need figure for each authority area, in accordance with the *National Planning Policy Framework* and national guidance.
- 2.1.2 The consequences of unmet housing need can be seen in increased levels of overcrowding, acute affordability issues, more young people living with their parents for longer periods, impaired labour mobility (that results in businesses finding it difficult to recruit and retain staff) and increased levels of homelessness.
- 2.1.3 Housing need is calculated on past trends and future projections of economic and population growth and will therefore be adjusted over time¹⁷. Nevertheless, the new Local Plan has been prepared on the understanding that there has, and will continue to be, an on-going high level of need for new housing in Portsmouth. A revised Standard Method for calculating housing need was published by Government in December 2020; under this methodology Portsmouth's current indicative housing need is **872 dwellings per annum**. In addition the Council is required to apply a delivery buffer of 20% for the first five years¹⁸ and 10% for the remainder of the plan period in order to take into account site choice and potential market fluctuations. This results in a total minimum housing target of **17,701** new dwellings.
- 2.1.4 However, the Government's assessment of housing need does not consider local constraints and deliverability, which also needs to be taken account of in the plan-

¹⁷Any significant change could necessitate early review of the policy.

¹⁸ The 20% buffer is required by the Government's Housing Delivery Test where less than 85% of the annual minimum housing target has been delivered on average over the previous three years.

making process. The actual deliverable level of housing in Portsmouth is subject to a number of constraints, including the availability of development land within a densely populated 'island city', impacts upon the protected coastal habitat (including water quality), local air quality the capacity of local infrastructure and the financial deliverability of development. However, part of the planning process is to test such identified constraints to see if they can be overcome. The housing target also does not take account of any agreement with other Local Authorities through the Duty to Cooperate or Statements of Common Ground developed through regional partnerships. The Council's appraisal of the capacity of Portsmouth to deliver new homes is summarised in the next section.

Question 4. Housing Need

National policy states that the minimum number of new housing to be planned for should be informed by local housing need and determined using the Government's standard method, unless exceptional circumstances justify an alternative approach in-line current and future demographic trends and market signals.

a. Is there an alternative approach for determining the level of housing need in Portsmouth - and if so, (b) what exceptional circumstances for Portsmouth should be considered?

Housing Supply

- 2.1.5 The Council has undertaken a detailed review of land within the city, in accordance with the requirements of national planning policy and guidance, to consider its potential to deliver further housing for the period 2020-2038.
- 2.1.6 The updated *Housing and Economic Land Availability Assessment (HELAA)*¹⁹ has been prepared following a systematic appraisal of all of the potential sources of housing land within the city, including an exhaustive 'call for sites' to establish what land in the city is available for development. The document sets out how each site has been considered; in a densely developed city such as Portsmouth, many of the sites are subject to constraints. The HELAA consider how constraints could be overcome and how housing might be delivered in the identified locations.
- 2.1.7 The outcomes of the HELAA process are summarised in Table 2; it includes the anticipated sources of housing supply during the plan period, which are further explained below.

¹⁹ PCC (2021) *Housing and Economic Land Availability Assessment (HELAA)*

Table 2 - Housing Supply 2020-2038

Source		No of Dwellings
Permissions outstanding as at 31 March 2020		1,090
Proposed Strategic Sites:	City Centre	4,605
	St James' and Langstone Campus	460
	Tipner	4,081
	Cosham	740
	Fratton Park / Pompey Centre	750
	Lakeside Northharbour	500
Non-Strategic sites		5,169
Windfall housing		918
Equivalent contribution from student Accommodation		220
Equivalent contribution other residential accommodation (e.g. care homes)		40
<i>Under delivery discount²⁰</i>		-1,616
Total housing delivery 2020-2038		16,953
<i>Potential Duty to Cooperate contribution</i>		<i>1,000</i>

2.1.8 A brief summary of each source is as follows:

Permissions outstanding - as at 31 March 2020, planning permission has been granted for schemes which are expected to deliver 1,090 further dwellings (some permissions are counted under strategic sites).

Strategic sites - The plan identifies strategic sites with the potential to deliver 11,112 dwellings during the plan period, and a further 697 dwellings after the plan period. The proposed quantum and approach to the development of these strategic sites are detailed in policies S1-S6.

Non-Strategic sites - The HELAA has identified additional sites with a potential capacity of between 4,630 dwellings over the plan period. The sites set out in the HELAA are in addition to the strategic site allocations, and are largely comprised of small and medium scale sites.

Windfalls - These are sites of fewer than 5 dwellings that may unexpectedly come forward for development, and which are not identified in the HELAA or allocated in the Plan. A rate of 51 dwellings per annum has been calculated as justifiable for Portsmouth²¹. Windfall sites have been counted towards the housing land supply for the period 2022 to 2038.

Student accommodation - There have been a significant number of bespoke student accommodation blocks built within the city in recent years which helps to free up other residences currently occupied by students in the city. Using the government's ratio in the Housing Delivery Test (2.5 students beds equivalent to one dwelling), permitted schemes will free up the equivalent of 220 dwellings elsewhere in the city.

²⁰ Applicable to Non-strategic sites and City Centre Strategic sites

²¹ MHCLG (July 2018) *Housing Delivery Test Rule Book*

Other Residential Accommodation (Use Class C2) - This is predominantly consists of older persons accommodation. Using the Government's proposed ratio (1.8 beds equivalent to one dwelling), this is equivalent to 40 additional dwellings.

Duty to Cooperate Delivery - The Council has been in discussions with neighbouring authorities through the Duty to Cooperate, both unilaterally and through the Partnership for South Hampshire (PfSH). PfSH is looking at the cross boundary distribution of housing supply in the sub region and identifying 'Strategic Development Opportunity Areas' to accommodate unmet housing need.

The City Council has a close relationship with Havant Borough Council where a large proportion of the City Council's housing stock is located as well as reciprocal nominations rights for those on the housing register. The City Council also has a partnering relationship with Gosport Borough Council.

At this time, a *possible contribution* of 1,000 units from other local authorities has been retained while Duty to Cooperate discussions continue and as Portsmouth's final unmet need housing figure is determined.

Under Delivery Discount - This has been applied to take account of the difference between the number of dwellings permitted and the number of dwellings actually delivered in the city. For the 2011 to 2019 period, it was found that 85% of the dwellings permitted by the council were built; a 15% reduction has therefore been applied to non strategic sites and sites within the city centre to reflect this trend and to provide a buffer for any uncertainties in the estimated delivery of individual sites.

- 2.1.9 Table 3 demonstrates the difference between the Government's minimum annual housing need figure for Portsmouth and the assessed housing delivery capacity of the city; there is currently a gap between the calculated housing need and projected supply, which could be sought outside the city through the Duty to Co-operate. The housing supply will be adjusted to take account of new planning permissions, any under delivery against the government's housing need targets prior to adoption and any secured delivery through the Duty to Co-operate. The draft strategic site proposals and their estimated implementation rates may also be further refined as the plan progresses.

Table 3. Summary of Proposed Housing Supply and Assessed Housing Need 2020-38

Revised Standard Method 2020	No of Dwellings
Government's Standard methodology housing need target:	15,696
<i>Delivery Buffer:</i>	<i>2,005</i>
Total housing need (inc. delivery buffer)	17,701
Portsmouth's estimated housing delivery²² (inc. under delivery discount)	16,953
<i>Possible Duty to Co-operate contribution</i>	<i>1,000</i>

²² See Table 2: Housing Supply 2020-2038 for details

- 2.1.10 Policy H1 sets out how the assessed delivery capacity for additional new dwellings will be met during the plan period.
- 2.1.11 As Duty to Co-operate discussions on the distribution of the housing need progress with PFSH and other local authorities, this policy may be updated to reflect where and how much of the city's housing need could be delivered outside of Portsmouth.

Policy H1: Housing Need and Supply

At least 17,701 net additional dwellings will be provided in the city between 2020 and 2038. Housing has or will be provided through:

- Sites that have planning permission as at 31 March 2020;
- Strategic sites.
- Identified non strategic housing sites
- Unexpected (windfall) development.
- An appropriate contribution from bespoke student and other specialist and communal accommodation.
- An agreed contribution from the local authorities through the Duty to Co-operate.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Delivery of homes per annum to meet identified housing need.	- Permissions and completions for residential development
	- Regular housing supply updates through the Council's HELAA
	- Responses to the Housing Delivery Test

Further Information:

- *PCC (2021) Housing targets background paper*
- *PCC (2021) Contribution of Windfalls to housing supply background paper*
- *PCC (2021) Housing and Economic Land Availability Assessment (HELAA)*

Question 5. Housing Supply

Table 2 sets out the anticipated sources of housing supply²³ from 2020 - 2038.

- a. Do you agree with the suggest approach to housing supply for the plan period?
- b. If you disagree, are there alternative sources or major sites for housing supply that should be considered?

²³ The suitability of individual strategic sites is considered in *Chapter 7: Strategic Development Sites*

2.2 Housing Types, Mix and Affordability (Policy H2)

- 2.2.1 The City Council has a housing target of 17,701 dwellings over the plan period to 2038. These needed homes could take the form of a range of different types and tenures of residential dwellings.
- 2.2.2 The Council must establish what the need is for different types of residential accommodation and strive to ensure that everyone in Portsmouth has an opportunity to live in a decent home, which they can afford. To achieve this, the city will need a varied mix of dwelling types and sizes and a sufficient supply of 'affordable housing' (homes at a subsidised rate for households that would be otherwise be unable to secure decent housing at market cost).

Why is this policy needed?

- 2.2.3 National policy guidance states that strategic policies should be informed by a Local Housing Need Assessment, conducted using the standard method in national planning guidance. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This is including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- 2.2.4 The housing type and tenure requirements for the city also need to be deliverable. Viability assessment at the plan making stage should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the Plan overall.

Housing Needs and Viability Assessment

- 2.2.5 There is a need to plan for and deliver a variety of housing throughout the city to provide a choice of high quality homes and to create inclusive, mixed and sustainable communities. The Council commissioned a *Local Housing Needs Assessment* (2019)²⁴, which identified that there was significant need for a wide range of different housing types (set out in the sections below).
- 2.2.6 The role for viability assessment in the planning process should be primarily at the plan making stage. The Council commissioned a *Development Viability Assessment* (October 2020) to consider the outcomes of the *Local Housing Needs Assessment* and other proposed local plan requirements to determine if they were achievable in Portsmouth. The results of that assessment informs the proposed levels at which certain housing types and tenures requirements have been set.

²⁴ The Study drew upon a range of evidence including the Council's housing waiting list.

Family Housing

- 2.2.7 Of all new homes built in Portsmouth between 2012 and 2016, 26% were family homes (those with 3 or more bedrooms). Evidence from the *Portsmouth Housing Needs Assessment* suggests that the number of larger properties (3+ beds) required in the city would need to be 57% of new residential (Use Class C3) dwellings.
- 2.2.8 The provision of more family housing will offer more local choice to families who otherwise may have to look outside of Portsmouth for suitable housing. Opportunities should be taken to provide a significant proportion of family housing in new development where possible. However, it also needs to be recognised that Portsmouth is part of a wider housing market area which includes neighbouring districts/ boroughs which are less urban in nature and provide a much larger proportion of family sized properties. There is commuting within the housing market areas as well as relocation at different stages of life/ career. This has been recognised previously in discussions with neighbouring authorities. There is also a specific identified need for larger social houses, the provision of which would also enable the freeing up existing housing stock for those on the Council's Housing Register as appropriate.

Self-build and Custom-build Housing

- 2.2.9 Self-build and custom housebuilding is part of the housing mix options for the city. Government legislation 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. The information contained within this register is used to inform the Portsmouth City Council's planning, housing, land-disposal and regeneration functions.
- 2.2.10 The Council will support proposals for self-build and custom-build projects where they demonstrate high-quality design and are appropriate to the positive character of the local area. On a site where more than more than one self-build or custom-build dwelling is proposed, a design framework should be submitted as part of the planning application.

Accessible and Adaptable Homes

- 2.2.11 The provision of accessible and adaptable homes 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 *Housing Needs Assessment* identifies a minimum need for 41% of new dwellings to meet M4 (2) standards (accessible and adaptable homes) and 5% to meet M4(3) standards (wheelchair user dwellings) by the end of the plan period.
- 2.2.12 Based upon the results of the *Development Viability Assessment*, the Council would expect 20% of market and affordable home schemes to provide accessible

and adaptable housing by meeting requirement M4(2) of the Building Regulations, and 5% meeting M4(3) wheelchair adaptable standards.

- 2.2.13 Accessible homes, including wheelchair accessible homes, should be provided as part of the affordable housing provision for local authority where appropriate. 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 development site to address this need.

Accommodation for the Elderly

- 2.2.14 This type of accommodation can cover a range of types and needs: people over or approaching retirement age, including the active, newly retired through to the very frail elderly. Housing type can encompass accessible, 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 may have higher support needs and therefore require specialist accommodation.
- 2.2.15 The *Housing Needs Assessment* identified a growing demand for specialist elderly accommodation (290 dwelling equivalent); an area that is addressed in *Portsmouth's Ageing Population Strategy (2010)* which aims to create an age friendly city by 2020. One element of this is to provide a range of housing options for older people (aged 55 plus with defined housing needs and health and/or support needs) that are adapted to their personal needs (which may be able to be met at home) and to encourage the development of sufficient extra care facilities and fit-for-purpose nursing provision where appropriate.
- 2.2.16 Some of the support needs of older people can be met by providing more care for people within their own homes in forms of sheltered accommodation. The City Council's *Sheltered Housing Service Future Requirements 2019 - 2035/6* report and *Sheltered Housing Guidance 2021/22* document sets the city's existing types of sheltered housing provision and considers how such evolving needs could be met in future. Where greater daily support is needed, the provision of specialist accommodation such as Extra Care may still be required.
- 2.2.17 The council 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.

Specialist and Supported Housing

- 2.2.18 Portsmouth is also home to a number of other vulnerable groups that also 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. To create inclusive communities, this type of accommodation should be located in accessible areas with links to public transport and local facilities.

- 2.2.19 Specialist accommodation can include hostels, residential institutions, accommodation suitable for those with disabilities and support needs and accommodation for the homeless. Flexible models of accommodation should be considered that allow residents to be supported within the city.
- 2.2.20 Developers should work with the Council to identify the need for specialist housing and suitable site provision.

Purpose Built Student Accommodation

- 2.2.21 The provision of purpose built student accommodation, in particular halls of residence, has seen a significant rise in recent years with a growing number of students attending the University of Portsmouth. Much of the recent provision of student accommodation has been delivered by the private sector (as opposed to the University). There is likely to be some continued interest in this type of accommodation from the market, particularly within the city centre.
- 2.2.22 Provision of purpose built student accommodation potentially allows for the release of Home in Multiple Occupation (HMOs) back to much-needed family homes or other types of accommodation. 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. It is proposed that student accommodation should be designed to be able to accommodate alternative uses, in order to provide flexibility over the long term if necessary.
- 2.2.23 The Council is continuing to work with the University of Portsmouth to ascertain the need for purpose built student accommodation in the city during the plan period. The Covid-19 pandemic is likely to impact the University of Portsmouth's estimations of their likely growth and accommodation needs in the short term. This will be explored further with the University of Portsmouth as the plan progresses.

Build to Rent

- 2.2.24 Build to Rent housing is as a distinct type of housing within the private rental sector. It is recognised by the *Portsmouth Housing Needs Assessment* as a type of housing that 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.

- 2.2.25 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 requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents, 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.
- 2.2.26 The Council may look to implement Build to Rent schemes in the city through Ravelin, a housing development company owned by PCC.

Shared Housing

- 2.2.27 The *Portsmouth Local Housing Needs Assessment (2018)* identifies a need to accommodate an additional 2,545 single person households. Historically, single person households have been accommodated through studios or one bedroom dwellings and in HMOs. Whilst these dwelling types do provide for the needs of single person households, such provision can reduce the availability of family homes through the conversion and sub-division of larger dwellings.
- 2.2.28 To meet the need for accommodation for single person households and to prevent further loss of family dwellings, the Council would support the development of purpose-built accommodation for this group, as appropriate.

Affordable Housing

- 2.2.29 The need for affordable homes is a key issues. The *Local Housing Needs Assessment* for Portsmouth shows a need for 47% affordable units, over the plan period. The provision of affordable housing to support those who cannot afford to secure a property on the open market should therefore be maximised where possible.
- 2.2.30 The *Housing Needs Assessment* indicated a need for 5,874 rented affordable housing and 2,176 affordable home ownership products (including a proportion of older persons accommodation)²⁵. The required levels of affordable housing can be delivered through a number of different products, including: affordable housing for rent, starter homes, discounted market sales, shared ownership and equity loans. Student accommodation and older persons accommodation may also be required to contribute towards the delivery of affordable housing where applicable.²⁶
- 2.2.31 The Government has recently brought into effect a requirement that the first 25% of affordable homes delivered through developer contributions are 'First Homes'²⁷,

²⁵ The need figure for affordable housing will be reviewed in-line with the overall housing needs figure as the Plan progresses.

²⁶ Where this considered to constitute residential (Use Class C3) dwellings.

²⁷ The Government's 'First Homes' guidance (May 2021) provides further detail of how first homes are implemented and the eligibility requirements for accessing them.

that will be available to buy with a minimum discount of 30% below their full market value, which can be prioritised for local residents as required²⁸.

- 2.3.33 A *Viability Study* was carried out to test the impact of all potential requirements on new residential development (e.g. such as affordable housing provision, Community Infrastructure Levy (CIL) payments or environmental mitigation) due to be 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 as well as in site by 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 tested (0% - 40%). Within that range of thresholds, a split of tenures, with 70% to be provided as affordable rent and 30% to be provided as low-cost home ownership, was used. This tenure split was informed by the *Local Housing Needs Assessment* and also reflects the existing *Portsmouth Core Strategy* (2012) position.
- 2.2.32 *The Viability Study* recommended that a 20% requirement for affordable housing should be applied to new residential schemes, as the most appropriate level for securing affordable housing viably from private sector development, after concluding that a higher requirement would be frequently unaffordable for market development in Portsmouth when taking into account the need for other development contributions. A 20% affordable housing delivery is potentially viable for 97% of the expected development in Portsmouth during the plan period, while a 30% threshold would potentially be viable for less than half.²⁹
- 2.2.33 However on balance, it is considered preferable to set an affordable housing target that is more ambitious for the city, reflecting the priority to provide such housing for people in need. Therefore a higher threshold has been selected but with the flexibility of being subject to viability testing on a case by case basis. In light of the expected need to undertake individual viability testing on a significant number of cases, the tenure split requiring 70% of Affordable homes to be offered at affordable rent has been retained to provide a basis for development viability negotiations.
- 2.2.34 Any such overall affordable housing threshold would be a minimum requirement, and the Council will also seek to meet the need for affordable housing by providing greater proportions on affordable housing (of 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 Landlord's.

²⁸ Local authorities and neighbourhood planning groups can choose to require higher minimum discounts at 40% or 50% if need can be evidenced.

²⁹ See the Affordable Housing Background Paper (PCC, 2021) for further information.

2.2.35 Further guidance on affordable housing provision may be produced to assist applicants.

DRAFT DEVELOPMENT MANAGEMENT POLICY H2: HOUSING TYPES, MIX AND AFFORDABILITY

2.2.36 Policy H2 aims to ensure that variety of housing is delivered in the city to provide a choice of high quality homes and to create inclusive, mixed and sustainable communities. The proposed requirements are set out for each housing type.

2.2.37 It is vital that developers engage in pre-application discussions with the Council and the specialist Housing Enabling team to discuss their affordable housing proposals. These pre-application discussions will ensure that requirements for the development are fully understood by all, and that development contributes to an increased amount of affordable housing in Portsmouth, which is delivered at an appropriate size, mix and tenure.

Policy H2: Housing Types, Mix and Affordability

Family housing

The provision of accommodation should meet the needs of families and larger households. Therefore developments should achieve a proportion of family housing (3+ beds) where appropriate.

While proposals should strive to meet this target, it is acknowledged that the appropriate number of family sized dwellings on a site is dependent on both the character of an area, the site and viability of a scheme.

Self-build and custom-build housing

Proposals for self-build and custom-build projects that demonstrate high-quality design and which are sympathetic to the positive character of the local area will be supported.

Accessible and adaptable homes

A target of 20% of all dwellings must be built to accessible and accessible standards to meet the requirements of Building Regulations M4(2), Subject to site suitability.

A target of 5% of all dwellings are to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3), subject to site suitability.

Older persons housing

Proposals for well-designed housing to meet the needs of older persons will be supported where there is an identified need, and:

- The site is in an appropriate location, in close proximity to local facilities and services, and can be easily accessed by sustainable transport; and
- An appropriate tenure mix is provided.

Policy H2: Housing Types, Mix and Affordability

Specialist and supported housing

Proposals for well-designed specialist and supported housing will be supported where there is an identified need, and:

- The site is in an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport;
- The development does not conflict with adjacent uses or the general amenity of the surrounding area; and
- An appropriate tenure mix is provided.

Purpose Built Student Accommodation

Proposals for purpose built student accommodation will be supported where:

- The development is in an appropriate location, which is close to the University of Portsmouth or other educational establishment and easily accessible by sustainable transport;
- The development does not conflict with adjacent uses or the general amenity of the surrounding area;
- Appropriate management plans are submitted ensuring that a positive and safe living environment is created for students and to minimise the potential negative impacts on the local community;
- All proposals are 'future-proofed' in terms of design to support potential alternative uses as appropriate; and
- Adequate storage is provided for recycling and refuse.

Build to Rent

Proposals for well-designed Build to Rent housing will be supported where:

- The site is in an appropriate location, in close proximity to local facilities and services, and can be easily accessed by sustainable transport; and
- 20% of the Build to Rent units are provided (and maintained in perpetuity) for affordable private rent.

Provision of affordable housing

To contribute to meeting the identified need, all proposals that would create a net increase of 10 or more dwellings must make provision for 30% affordable housing delivery³⁰, unless otherwise agreed with the Council. The tenure mix of the affordable dwellings secured through developer contributions should be 70% affordable rented, 25% should be available as 'First Homes', and the remaining 5% available as either 'First Homes' or provided by another affordable route to home ownership including discounted market sales housing.

The applicant will be required to submit an 'open book' viability assessment where schemes do not meet the above policy requirements. In such cases, the Council will commission an independent review of the submitted viability study, for which the applicant will bear the cost. Such proposals will only be acceptable where the viability case is accepted by the Council and the approach contributes towards creating mixed and balanced communities.

³⁰ Calculated as a percentage of the total number of C3 Class dwellings proposed.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Delivery of a choice of high quality homes to meet identified housing needs	<ul style="list-style-type: none"> - Proportion of developments meeting policy requirements for family housing and affordable housing. - Number of specialist and supported housing, older persons housing and student accommodation units delivered. - Delivery of self-build and custom-build plots.

Further Information

- ORS (2019) *Portsmouth Local Housing Needs Assessment*
- PCC (2014) *Student Halls of Residence Supplementary Planning Document*
- PCC (2021) *Affordable Housing background paper*
- HDL Planning (2020) *Viability Assessment of the Portsmouth Local Plan*
- PCC Portsmouth Ageing Population Strategy (2010)
- Sheltered Housing Guidance Document 2021 -22
- Sheltered Housing Future Requirements (2019)
- Developing Affordable Housing:
<https://www.portsmouth.gov.uk/ext/development-and-planning/planning-policy/developing-affordable-housing>
- PCC Housing Waiting list:
<https://www.portsmouth.gov.uk/services/housing/looking-for-a-home/housing-waiting-list/>

Question 6. Housing Types, Mix and Affordability

Do you agree with the proposed approach to the provision of the following in Portsmouth:

- a. Family housing?
- b. Self and custom built housing?
- c. Accessible and adaptable homes?
- d. Older persons housing?
- e. Specialist and supported housing?
- 4. Purpose Built Student Accommodation?
- g. Build to Rent?

If you disagree, what changes would you suggest and why?

- h. Affordable housing?

In light of the conclusion of the Viability Assessment of the Local Plan there is a risk that the proposed 30% requirement, which would potentially be viable for less than half of expected developments in Portsmouth, is undeliverable and would require frequent case by case viability testing. 4i. Consequently should an alternative requirement be considered, and what should that be and why?

Due to the national requirement to provide 25% of new affordable homes as 'First Homes' and the viability challenges in Portsmouth, is the proposed tenure split, of 70% affordable rent and 30% low cost home ownership (incorporating the 25% First Homes requirement), appropriate for Portsmouth?

j. If not, what tenure split should be used, and why?

DRAFT

2.3 Houses in Multiple Occupation (Policy H3)

- 2.3.1 A House in Multiple Occupation (HMO) is a property rented out by three or more unrelated people who are not from one 'household' (a family for example) but share communal facilities such as the bathroom or kitchen. It is sometimes called also called a 'house share'.³¹

Why is this policy needed?

- 2.3.2 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 well-being with a high standard of amenity for existing and future users.

Changes of Use to HMOs

- 2.3.3 'Article 4 Directions' can be used to remove national permitted development rights in situations where it is necessary to protect local amenity of the well-being of the area.
- 2.3.4 On 1st November 2011, a city-wide Article 4 Direction came into force in Portsmouth. The Direction means that planning permission is required for changes of use from residential (Class C3) to small HMO (Class C4) uses. Properties that were already in use as a C4 HMO prior to 1 November 2011 are not affected by the Article 4 Direction. The Direction means that planning permission is now required in order to change the use of a Class C3 dwelling house to a Class C4 HMO where between three and six unrelated people share a kitchen and/or a bathroom.

The Need for HMOs in Portsmouth

- 2.3.5 The *Housing Needs Assessment* prepared for the Council identifies the range and types of homes required to meet the needs of different groups in the community.
- 2.3.6 The Assessment identifies a need to accommodate an additional 2,545 single person households. Historically, this need has been met through one-bedroom dwellings and HMOs. The Assessment also highlights a continued demand for HMO accommodation in the city to meet the housing needs of a number of groups, in particular those on low incomes, those in receipt of benefit payments as well as students and young professionals. Although it is expected that increased

³¹ 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.

provision of purpose built student accommodation may reduce demand for HMOs. Although it is expected that increased provision of purpose built student accommodation may reduce demand for HMOs.

- 2.3.7 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 sub-division of larger dwellings. The potential for negative social, environmental and amenity impacts of high concentrations of HMOs on local communities have also 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.

Supplementary Planning Guidance

- 2.3.8 The Council adopted an updated HMO Supplementary Planning Document (SPD) in November 2019. The SPD sets out the City Council's approach to mitigating the potential harm caused by concentrations of HMOs and ensuring that Portsmouth's communities are mixed, balanced and sustainable. This includes 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.
- 2.3.9 Further evidence will continue to be gathered on the impacts on HMOs across the city. This could support a position for creating a policy presumption against HMOs in certain parts of the city, where it can be demonstrated that there is an existing 'imbalance' from an overconcentration of HMOs. The *HMO Supplementary Planning Document (SPD) (2019)* will be updated as required.
- 2.3.10 Proposals should also refer to Council's *Private Rental Strategy (2020)*, which sets out standards for private rentals in the city, including HMO's.

DRAFT DEVELOPMENT MANAGEMENT POLICY H3: HOUSES IN MULTIPLE OCCUPATION

- 2.3.11 The provision of HMOs in the city is important for meeting the housing needs of a number of groups within the community. Policy H3 seeks to support the development of new HMOs whilst ensuring that 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 H5: Residential Space Standards* and *Policy D1: Design*.

- 2.3.12 As well as the requirements set out in Local Plan, developers and potential landlords must be aware that there is also mandatory licensing for a wide range of HMOs. Applications for a HMO license should be made separately to the City Council's Private Sector Housing Team.

Policy H3: Houses in Multiple Occupation

In order to support mixed and balanced communities and ensure that a range of household needs continue to be accommodated within 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:

- Less than 10% of residential properties within a 50m radius of the area surrounding the application property are in existing use as a HMO;
- Development avoids harm to the amenity of residents; and
- Developments takes account of the HMO Supplementary Planning Guidance.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Supporting mixed and balanced communities	- Changes in the concentration of HMOs in the city
➤ Protecting amenity and quality of life for HMO occupiers and their local community	- Proportion of proposal for HMOs meeting the amenity standards set out in the HMO SPD.

Further Information:

- PCC (Nov 2019) Houses in Multiple Occupation SPD
- HMO Advice and Frequently Asked Questions:
<https://www.portsmouth.gov.uk/services/development-and-planning/planning-applications/planning-houses-in-multiple-occupation/>
- Shared houses – mandatory licensing of HMOs:
<https://www.portsmouth.gov.uk/services/housing/landlords/shared-houses-mandatory-licensing-of-hmos/>
- ORS (2019) *Portsmouth Local Housing Needs Assessment*
- PCC (2020) Private Rental Sector Strategy

Question 7. Homes in Multiple Occupation

a. Do you agree with the proposed approach to the provision of the Homes in Multiple Occupation in the city?

b. If you disagree, what changes would you suggest and why? E.g. should an alternative threshold or case by case assessment be considered instead?

2.4 Gypsies, Travellers and Travelling Showpeople (Policy H4)

- 2.4.1 As well as planning for the housing needs of those in 'bricks and mortar' accommodation, the Local Plan must also consider the needs of travelling communities.
- 2.4.2 There are distinct differences in the culture of Gypsies and Traveller and Travelling Showpeople. Government policy in *Planning Policy for Traveller Sites* (2015) provides the following separate definitions:
- **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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."
 - **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).
- 2.4.3 There are currently no authorised Gypsies and Traveller and Travelling Showpeople sites within Portsmouth.

Why is this policy needed?

- 2.4.4 In accordance with national planning policy, the Council must undertake a robust assessment of gypsy and traveller accommodation need in the Portsmouth area to inform the preparation of the Local Plan, including the identification of suitable sites.
- 2.4.5 Where there is a determined need for site provision, a five year supply of specific deliverable sites (against a locally set target) must be identified, with the identification of the broad locations for additional provision over the longer term as a minimum. Where there is no identified need, criteria-based policies should be set to provide a framework for decisions should a planning application be submitted to the Council. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

- 2.4.6 The City Council commissioned a *Gypsy and Traveller Accommodation Assessment* (GTAA) to support the preparation of the Local Plan. The GTAA sought to understand the current situation in the city with regards to travelling

communities and any future accommodation needs, including the number pitches and plots that would be required in Portsmouth in the plan period. The Assessment also considered the need for transit or temporary stop areas.

2.4.7 The GTAA included a review of historical data, engagement with key stakeholders and neighbouring authorities and fieldwork within the city. While the study identified instances of 'unauthorised encampments' these were not occupied by Gypsy, Travellers or Travelling Showpeople (as defined in para.#). The Assessment therefore concluded that there is currently no need to identify permanent pitches or plots or transit sites during the plan period. It recommends that the Council may instead consider the use of management arrangements, such as Negotiated Stopping Agreements, for any transit unauthorised encampments.

2.4.8 Data on unauthorised encampments will continue to be monitored.

DRAFT DEVELOPMENT MANAGEMENT POLICY H4: GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ACCOMMODATION

2.4.9 Although there is currently no identified need for Gypsies, Travellers and Travelling Showpeople Accommodation, a criteria based policy will be required to assess any planning applications received and/ or any new accommodation needs that arise during the plan period. Policy H4 therefore provides the framework for determining the merits of such proposals.

2.4.10 The health and well-being of site occupants will need to be considered, including matters such as proximity to conflicting development and amenity and safety concerns including flood risk.

Policy H4: Travellers and Travelling Showpeople

In considering proposals for accommodation sites for Gypsies, Travellers and Travelling Show people, planning permission will be granted where the following criteria are met:

1. The site is well related to and within a reasonable distance of local services with capacity, including education establishments, shops, community facilities and health and welfare services;
2. Where proposed for permanent provision, the site is not located within Flood Zone 2 or 3;
3. Where proposed for temporary provision, the site is not located within Flood Zone 2;
4. The site is capable of being provided with on-site services including water supply, sewage disposal and power supply;
5. The proposals include provision of adequate on-site facilities for parking, ancillary storage, play space and residential amenity;
6. It can be demonstrated that there is safe and reasonable access to the highway for vehicles and pedestrians;

7. The proposals does not cause any significant adverse impact upon local character, appearance or amenity and upon the natural or historic environment.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Ensuring any applications for Gypsies, Traveller and Travelling Showpeople plots or pitches are appropriately sited	- Applications granted in accordance with Policy H4.
➤ Monitoring the need for Gypsies, Travellers and Travelling Showpeople accommodation in the plan period	- Number of qualifying unauthorised encampments in the city

Further Information:

- ORS (2018) *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment*
- CLG (updated Aug 2015) *Planning Policy for Traveller Sites*: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

Question 8. Gypsies, Travellers and Travelling Showpeople

- a. Do you agree with the proposed approach to the provision for Gypsies, Travellers and Travelling Showpeople Accommodation?
- b. If you disagree, what changes would you suggest and why?

2.5 Residential Density (Policy H5)

- 2.5.1 Portsmouth is known for being one of the UK's most densely populated cities, a trend that is continuing with increases in the average density of new build development since 2012.
- 2.5.2 Residential density is the measure of the number of dwellings within a specific area or scheme, it is most commonly expressed in dwellings per hectare (dph). Building density levels in Portsmouth have always been relatively high, in part due to the from the historic development of the city, with the rows of artisan terraces built for the Naval Dockyard workers and their families, as well as the island geography constraints on developable land.

Why is this policy needed?

- 2.5.3 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 are well served by public transport, supported by a suitable range of densities to appropriately reflect the development potential of different areas.
- 2.5.4 There is a significant demand for additional housing within Portsmouth; it is important therefore that the most efficient and effective use is made of land and development opportunities, as appropriate for its location. However, density is only one aspect of design, as the National Design Guidance highlights, and built form will ultimately be influenced by a range of design principles (See Policy *D1: Design*).

Uplifting Residential Densities in Portsmouth

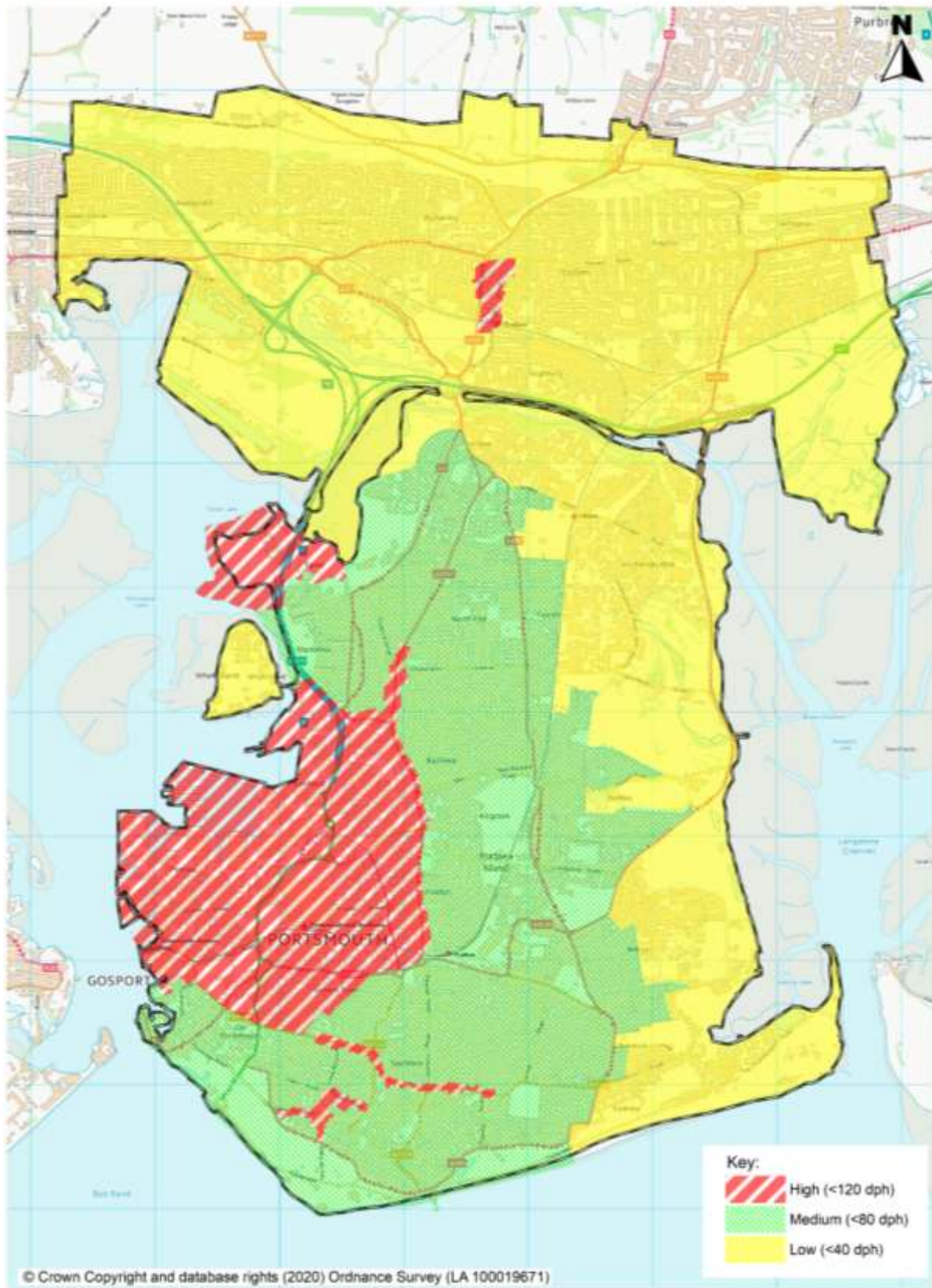
- 2.5.5 In order to achieve the uplift of prevailing densities required, an understanding is needed of the range of existing housing densities within the city. The *Urban Characterisation Study* (2011) divides the city into a number of character areas with an indicative, average density. The majority of the city area, with the exception of parts of Portsea and the City Centre, are still of a similar density to the position set out in the original 2011 Study; as such this Study is still considered to be a relevant baseline.
- 2.5.6 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.

- 2.5.7 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 found that since 2012 the average density achieved on new development has exceeded both of 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.
- 2.5.8 New density targets have been developed an 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 well-being through potentially encouraging more active travel (and reducing congestion) and directing higher growth to town centre locations.

DRAFT DEVELOPMENT MANAGEMENT POLICY H5: RESIDENTIAL DENSITY

- 2.5.9 Policy H5 seeks to increase the density of resident development in Portsmouth within appropriate locations to make more efficient and effective use of the land available for residential development.
- 2.5.10 It is proposed that the city area is divided into three broad density zones (see Figure 4) with an appropriate minimum density.
- High Density: Highly Accessible Areas
The City Centre and surrounds, Tipner and the town and district centres will form a new high density zone with a minimum density for new development of 120dph. These areas will be the focus of new high density development within the city to help promote less car dependence, support retail and provide access to local employment.
 - Medium Density: Residential Core
The existing denser residential core area will have a new ambitious target of minimum target of 80dph that aims to ensure that there is uplift in prevailing densities across a significant area of the city.
 - Low Density: Suburban Edge
The more 'suburban' edge provides an opportunity for a wider range of types and tenures of residential development to be delivered within the city, and will therefore have a lower density target of 40dph, as a minimum.

Figure 4-Proposed Residential Density Map



Policy H5: Housing Density

Planning permission for residential development will be granted planning permission where the density per hectare (dph) is in accordance with the minimum density for its broad location (as indicated in Figure #) and as follows:

- High density development of at least 120dph in areas of high accessibility, including the City Centre and Tipner and town centre areas;
- Medium density development of at least 80dph across the city's core residential area;
- Lower density development of at least 40dph in the more suburban edges.

However, it is also recognised that appropriate housing densities depend on various factors, and that built form is may be in part determined by urban design principles that combine layout, form and scale in a way that responds positively to its context. The rationale for proposals for alternative density levels to those outlined above should be made by the applicant in an accompanying Design and Access Statement.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Ensuring an uplift in residential density, appropriate to the different areas of the city.	- Density of permitted residential dwellings

Further Information:

- PCC (2021) *Housing Density background paper*
- PCC (2011) *Urban Characterisation Study*

Question 9. Housing Density

a. Do you agree with the proposed approach to the density of new homes in city - (including the geography of the proposed density zones and the proposed level of density?)

b. If you disagree, what alternative levels/ zones should be set and why?

2.6 Residential Space Standards (Policy H6)

- 2.6.1 The City Council is dedicated to ensuring that the provision of high quality living environments is not comprised by the need to deliver the necessary new housing for the city.
- 2.6.2 Residential 'space standards' refer to the minimum internal space (gross internal floor area) for new dwellings that require planning permission. Space standards for new homes set out requirements for the floor space area and dimensions of the building and particular areas according to the number of occupants, including dimensions for bedrooms, storage and floor to ceiling height.

Why is this policy needed?

- 2.6.3 New homes must meet the needs of current and future residents and set the foundations for well-designed, safe environments that support health and well-being. The application of space standards will ensure internal floorspace in new developments are suitable for the number of people the dwelling is designed to accommodate.
- 2.6.4 In March 2015 Government announced a new approach to the setting of technical standards for housing in England; Local Planning Authorities can opt to use *Nationally Described Space Standards* to ensure homes meet minimum size requirements, rather than setting their own standards for internal space in their Local Plans. The Council currently still has the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water (See *Policy H2: Housing types, Mix and Affordability* and *G3: Water Quality*).

Housing and Amenity Space in Portsmouth

- 2.6.5 Portsmouth, as a densely populated city with pressures on public open space from a growing population, needs to provide new homes that are sufficient in size and amenity provision to support residents' mental and physical well-being.
- 2.6.6 Although space is an important element of high quality development, homes that offer adequate internal floor area but lack amenity or storage space are unlikely to meet the needs of residents.
- 2.6.7 Analysis of past ³² found a strong correlation between the size of dwellings (number of beds) in the city and the proportion that met the Nationally Described Space Standards. Smaller dwellings with fewer beds were significantly less likely to be Space Standard compliant than larger dwellings; only 32% of the one-bed, one person dwellings permitted met the Standards. By comparison, the National

³² 2015-2020

Space Standards were met by every permitted three-bed / five person dwelling and 82% of the two-bed four person dwellings.

- 2.6.8 Portsmouth has a number of areas ranked amongst the highest levels of deprivation in the country³³. The city needs to work to improve living standards for its residents, it is important therefore that the NDSS are formally adopted in Local Plan to avoid the creation of substandard dwellings, particularly to protect residents who may have fewer housing options available to them.

DRAFT DEVELOPMENT MANAGEMENT POLICY H6: RESIDENTIAL SPACE STANDARDS

- 2.6.9 The aim of Policy H6 is to address overcrowding of properties and increase the number of people living in decent sized homes in the city.
- 2.6.10 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 *Nationally Described Space Standards* (or future equivalent) and provide adequate amenity space.
- 2.6.11 All proposal for new homes (including change of use or conversions) must meet each appropriate space standard as a minimum, unless it can be sufficiently demonstrated that there are in exceptional circumstances in which the national standard is not appropriate. There are no maximum standards and developers are encouraged to provide larger rooms and dwellings where appropriate and in-line with *Policy H5: Housing Density*.
- 2.6.12 Nationally Described Space Standards apply across all tenures. Additional standards for affordable housing (both privately and publically funded) can be found in the Council's *Providing Affordable Housing in Portsmouth* guidance document.
- 2.6.13 The new Local Plan may be accompanied by supplementary guidance on design matters including the provision of sufficient amenity space.

Policy H6: Residential Space Standards

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.

Planning permission will be granted for new homes that:

- Meet as a minimum the Nationally Described Space Standards (or future equivalent).

³³ MHCLG (2019) *Index of Multiple Deprivation*

- Provide sufficient private and/ or communal outdoor amenity space/ balcony space proportionate to the number of bedrooms. Where development is in close proximity to public open space, reduced provision may be acceptable.
- Provide sufficient storage space for refuse and recycling
- Provide sufficient levels of weatherproof and secure bicycle parking (in accordance with levels set out in the Council's Parking Standards SPD)

Policy Monitoring	
Policy Aim	Key Indicator
➤ Increasing the number of Portsmouth's residents living in decent sized homes	- Proportion of new dwellings meeting nationally prescribed space standards.
➤ Ensuring new development provides sufficient space for daily activities and need.	- Proportion of new dwellings providing sufficient refuse, recycling and bicycle parking facilities

Further Information:

- PCC (2021) *Space Standards Background Paper*
- MHCLG (amended May 2016) *Nationally Described Space Standards*
<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>
- PCC (2014) *Parking Standards and Transport Assessments SPD*

Question 10. Residential Space Standards

- a. Do you agree with the approach to space standards for new residential development?
- b. If you disagree, what changes would you suggest and why?

3 - Economic Development and Regeneration (Policy E1)

- 3.1.1 Economic development and growth are key to enabling access to opportunities that will support a decent quality of life for all Portsmouth residents. Regeneration is therefore not just about improving the built environment, but also generating positive social change and health and well-being improvements.
- 3.1.2 Portsmouth's 'island city' geography, naval history, industrial heritage and demographic profile has influenced the demand, investment and type of economic activities that take place in the city today, with key sectors in defence and aerospace, advanced manufacturing and engineering, digital and creative industries, marine and maritime industries 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.

Why is this policy needed?

- 3.1.3 National planning policy places significant weight on supporting economic growth and productivity. The Local Plan must set out a clear economic vision and strategy to encourage sustainable economic growth. The approach of the Local Plan must also provide enough flexibility to allow for economic change, uncertainty and technological advancements in a way that also promotes clean growth. While the impacts of the Covid-19 pandemic has created some uncertainties around long term growth forecasts, the Local Plan can help to provide the foundation for the city's economic response and recovery. It will also be important to build wider social value into how recovery is facilitated, with the aim of delivering positive social, economic and environment impact where possible.
- 3.1.4 One of the key challenges for the Portsmouth Local Plan is to seek to provide a balance between the provision of sufficient and accessible employment land to support growth and local opportunities whilst also striving to meet the need for quality homes for a growing population within the physical and environmental constraints of the city.

Portsmouth's Economy

- 3.1.5 The city is key to the Solent's growing marine and maritime sector; Portsmouth benefits from the presence of 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-occupied³⁴ industrial estates in Hilsea support a range of sectors. The city's economy is also boosted by its tourism and cultural offer (see Section 3.2) stemming largely from its Naval Heritage and coastal environment.

- 3.1.6 The University of Portsmouth contributed around £1.1. Billion Gross Value Added (GVA) to the British economy in 2015/16, of which £476m GVA was to the direct benefit of the Portsmouth economy. The presence of the University helps support local businesses and adds to the vibrancy of the city. The University's activities, which include running business incubators and innovation centres, research and consultancy services, training, student placements and open days, all provide further support to the Portsmouth economy.
- 3.1.7 However, there is notable under-representation in Portsmouth in 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. In 2019, prior to the economic shock of the Covid-19 pandemic, unemployment in Portsmouth was below the national average though slightly above the south-east average (3.5% compared to 4.1% and 3.1% respectively³⁵). However economic inactivity amongst the working age group (16-64 year olds) was comparatively high, with nearly one in four residents out of work particularly in the over 50s group. The causes for this are complex and can include ill-health, looking after a family or being a carer as well as those that are seeking work. Despite being a university city, Portsmouth has relatively few people with degree level skills; this poses a challenge for residents looking to obtain highly paid work. Portsmouth also has a higher proportion of residents with no skills (6.9%) compared to the average for the south east (5.6%), though this remains lower than the national average (8.0%).³⁶

Economic Growth and Regeneration in Portsmouth

- 3.1.8 The Council approved the *Portsmouth Economic Development and Regeneration Strategy (2019-36)* in October 2019, identifying a number of opportunities to boost prosperity in the city following consultation with residents, businesses and other key stakeholders. The Strategy's primary aspiration is to secure an additional 7,000 jobs in the city by 2036 by focusing on increasing the city's economic productivity by a third. The Strategy will be supported by a detailed action plan of short, medium and long-term aims including actions relating to the delivery of major regeneration opportunities in the City Centre, Tipner, Southsea Seafront and Fratton with potential support from the Government's *Future High Streets Fund*.

³⁴ 94.5% occupancy rate in the city's industrial units in September 2018.

³⁵ The unemployment rate in Portsmouth was 7% in September 2020 with 16,100 residents on job support schemes in August 2020.

³⁶ Hampshire County Council Quarterly Economic Growth Dashboard. 2019 data.

- 3.1.9 Meanwhile the Solent Local Enterprise Partnership (LEP) are preparing a *Solent 2050 Strategy* which will reflect the *UK's Maritime 2050 Strategy* (2019) and *UK Industrial Strategy's* (2018) 'five foundations of productivity'. The *Solent 2050 Strategy* will comprise the four core elements: providing support for the marine and maritime cluster, clean growth, the visitor economy and the renaissance of coastal communities.
- 3.1.10 The Council is also required by its *Social Value Policy*³⁷ to consider the wider impacts of spending of public funds on its services and functions. In terms of social impact, the Council have pledged to deliver 'improvements to the physical and mental wellbeing of local people, strengthening community spirit and collaboration to reduce poverty and social isolation, supporting young people, disadvantaged groups and address inequality, by raising aspirations of our future generations' through its decisions and procurement processes.

The Challenge of Clean Growth and Supporting the Marine/ Maritime Cluster

- 3.1.11 The marine and maritime industry has specific land and locational requirements. Identified waterfront sites, including 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 cluster and economy. See *Policy E2: Employment Land*.
- 3.1.12 The maritime transport sector is estimated to be responsible for 2.5% of global greenhouse gas emissions, a level that is projected to increase significantly if mitigation measures are not put in place. The Government has set out plans for how the UK can transition to 'zero emission' shipping in its *Clean Maritime Plan* (July 2019) alongside a request that all major ports in England develop their own air quality strategies, detailing how emissions will be reduced across all port operations. Portsmouth International Port are developing a new Masterplan on the direction of the future development of the port and as well as opportunities for clean growth. This masterplan will also take consider the Port's operational and spatial requirements following 'Brexit' and the Covid-19 pandemic.
- 3.1.13 Progress towards the clean growth and a 'zero emissions' future in the city could include the development of 'Innovation Quarters' or Marine Enterprise Zones (MEZs) specialising in clean growth technology or marine and maritime engineering, strategically co-located with higher education faculties and/ or key waterfront access sites. The development of any such specialist zones would also build upon Portsmouth's existing key strengths in Aerospace and Defence and Advanced Manufacturing and Engineering and help address the need to diversify the city's economy into more knowledge based sectors.

³⁷ Prepared under the requirements of *The Public Services (Social Value) Act 2012*

3.1.14 It is acknowledged that road traffic emissions (mainly nitrogen dioxide) are the main cause of poor air quality in Portsmouth; the Council fully recognises the impact of air pollution on public health and the environment and is committed to implementing measures to improve air quality. Through the Local Plan and the Portsmouth Transport Strategy (Local Transport Plan 4), we are striving to prioritise walking, cycling and public transport to help reduce congestion and traffic emissions. In parallel to this, Portsmouth's *Local Air Quality Plan Full Business Case* was approved by central government in March 2021 and will see a Class B charging Clean Air Zone delivered in the city. See Section 4.3: *Sustainable Transport and Policy D3: Amenity and Pollution*.

DRAFT DEVELOPMENT MANAGEMENT POLICY E1: ECONOMIC DEVELOPMENT AND REGENERATION

3.1.15 The Council is seeking to grow and diversify Portsmouth's economy to ensure its long-term stability. Raising the skill levels of Portsmouth residents, seeking to retain university graduates and increasing the proportion of residents in work will be key to productivity growth in the city, which will in turn help to support overall health and well-being.

3.1.16 The Council will continue to provide support and guidance for new and growing Portsmouth businesses and act as a facilitator to help to build stronger links between higher education providers and key sectors, such as the advanced manufacturing and engineering sector and digital and creative industries. This approach will support the city's 'knowledge economy', provide greater opportunities for improving skill and educational attainment levels and help to raise employment aspirations.

3.1.17 In pursuing economic growth for the city, the Council expects development proposals to incorporate 'clean growth' principles in order to protect and enhance the natural environment and mitigate and adapt to the effects of climate change.

Policy E1: Economic Development and Regeneration

The Local Plan will seek to support the sustainable economic development and regeneration of Portsmouth with a particular focus on improving local skills and increasing skilled employment opportunities within the city.

The Council will take a positive and proactive approach to the following:

- Working with key partners to deliver major regeneration projects for Portsmouth City Centre, Tipner and Southsea Seafront.
- The University of Portsmouth's Estate Masterplan proposals, and associated employment opportunities stemming from the University's operations and specialisms, as appropriate.

- Developing *Employment and Skills Plans* (or subsequent equivalents) with applicants to provide local work and training opportunities (including apprenticeships) and deliver wider social value from major residential and commercial development proposals, secured through S.106 agreements.
- Supporting applications for new employment uses, including start-up space and the temporary use of vacant spaces, as appropriate.
- The promotion of sustainable growth through the allocation of accessible land for employment and employment generating uses (including retail, leisure, culture and tourism and education) and the protection of land for new and existing employment uses.
- The identification of marine employment sites to promote the clustering and co-location of maritime, defence and aerospace sectors and related services, plus support for any related innovation quarters or enterprise zones, as appropriate.
- Increasing visitor numbers to Portsmouth by supporting the provision of new and enhanced tourism and cultural facilities and activity and the protection of existing facilities (Policy E3).
- Addressing health inequalities and seeking to improve the health and wellbeing of Portsmouth's residents through the Council's *Health and Wellbeing Strategy* and through planning and design (Policies D1-D4) to help reduce economic inactivity.

The 'clean' economic growth of Portsmouth will be sought by:

- Supporting proposals relating to a 'clean growth' innovation quarter or technologies, as appropriate.
- Encouraging early engagement between marine and maritime industries and the Council on any environmental and/or air quality improvement strategies or proposals, including the development of Portsmouth International Port's Masterplan.
- Encouraging high environmental standards from new development including low and zero carbon design and technology (Policy D2 and D4).
- Ensuring new development priorities sustainable modes of travel (Policy C4).
- Requiring proposals to provide net gains in biodiversity (Policy G1) and take account of the city's green infrastructure network (Policy G2).

Policy Monitoring	
Policy Aim	Key Indicator
➤ Delivery of major regeneration projects	- Planning permissions granted relating to regeneration in Portsmouth City Centre, Tipner and Southsea Seafront.

➤ Increasing local work and training opportunities	- Major residential and commercial applications granted with Employment and Skills Plans.
➤ Delivery of innovation quarters or enterprise zones relating to clean growth and/ or the marine and maritime cluster.	- Relevant planning permissions granted planning permission.

Further Information

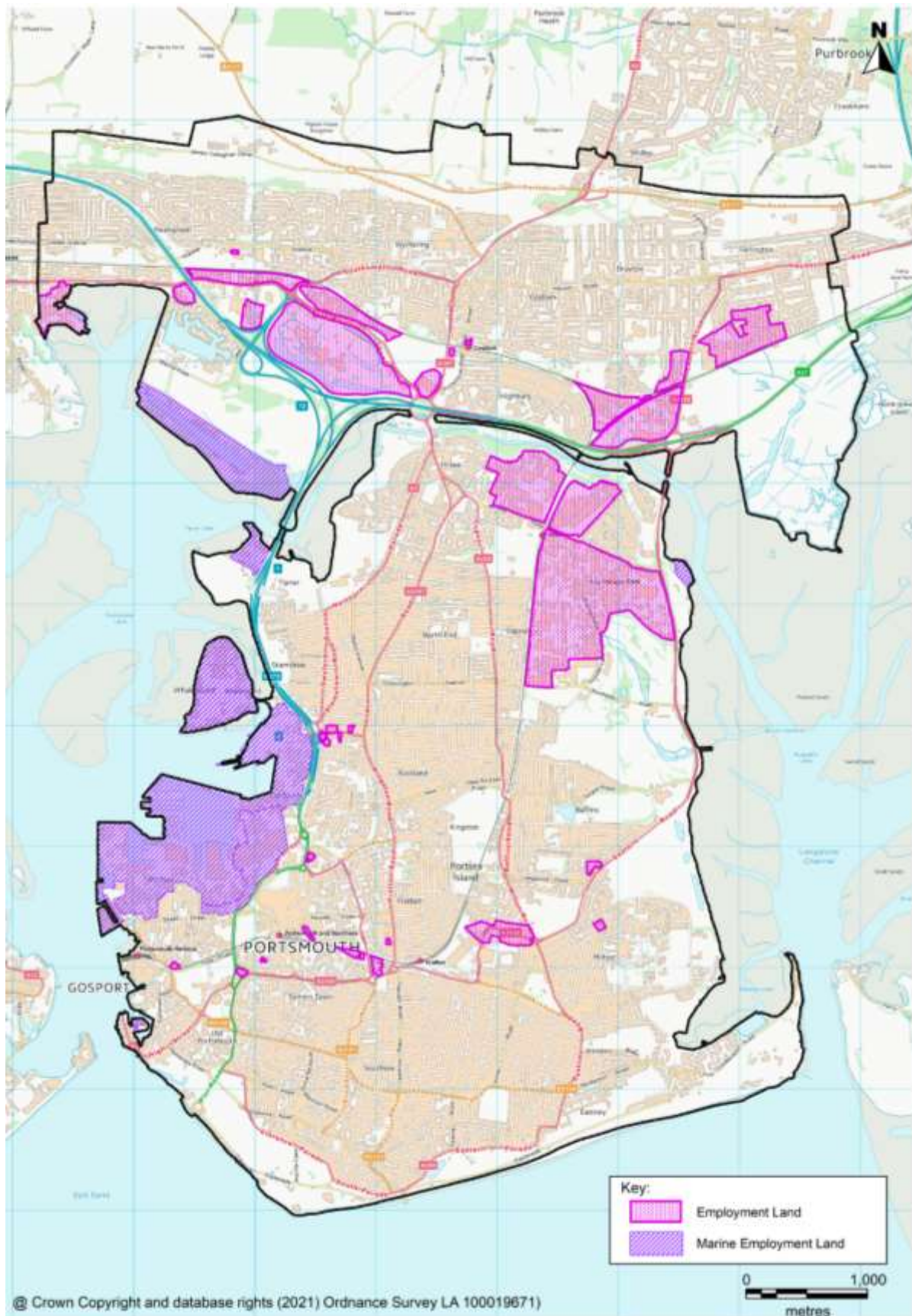
- Hampshire County Council economic and business intelligence data: <https://www.hants.gov.uk/business/ebis/reports>
- PCC *Economic Development and Regeneration Strategy (2019-36)*
- PCC *Achieving Employment and Skills Plan SPD (2014)*: <https://www.portsmouth.gov.uk/services/development-and-planning/supplementary-planning-documents/achieving-employment-and-skills-plans/>
- PCC *Air Quality Local Plan 2019 Outline Business Case*: <https://www.portsmouth.gov.uk/ext/environment/air-quality-in-portsmouth>
- PCC *Health and Wellbeing Strategy 2018-2021*: <https://www.portsmouth.gov.uk/ext/your-council/transparency/health-and-wellbeing-strategy>
- PCC Regeneration projects: <https://www.portsmouth.gov.uk/ext/development-and-planning/regeneration/regeneration>
- PCC *Visitor Marketing Strategy 2017-20*

Question 11 - Economic Development and Regeneration

- Do you agree with the approach to economic growth and regeneration?
- If not, what changes would you suggest and why?

3.2 Employment land (Policy E2)

Figure 5-Map of Employment Land



- 3.2.1 A wide variety of businesses and activities can provide jobs and support the growth of the economy; the Local Plan recognises this by allocating locates for housing, commercial uses, community facilities and culture and tourism activity through its strategic policies and site allocations. However, this section specifically focuses of the provision of offices, industrial uses and marine and maritime related employment land to ensure there is a sufficient long-term supply to support Portsmouth's growth aspirations and specialist sectors.

Why is this policy needed?

- 3.2.2 The loss of employment land and business uses can undermine the ability to provide a range of local employment opportunities and suitable and affordable land within the city for businesses. However, in-line with national planning policy guidance, the Local Plan must also provide a degree of flexibility to allow the economy to respond to change. This could this entail, for instance, allowing a greater mix of uses within employment areas, temporary permissions or by balancing the need for other types of development.

Employment Land in Portsmouth

- 3.2.3 There have been significant net losses in office space in Portsmouth in recent years, particularly in the city centre, largely due to the redevelopment of key sites to hotel and student accommodation as well as office to residential conversions under permitted development rights. While these losses may be reflective of market trends and other factors during this period, providing accessible, high quality office space remains essential for supporting the city's economic development and regenerations aims. New office floorspace is therefore required to meet both the existing undersupply and future demand. Growth in industrial land (mixed industrial and distribution uses) in Portsmouth has been comparatively buoyant in recent years however, and may see demand continue within particular sectors.
- 3.2.4 Employment land evidence prepared for the new Local Plan advises that all existing employment land areas, identified in Figure 5, remain largely suitable for modern requirements and should not be released for alternative uses at this time. The delivery of sufficient employment land during the plan period also relies on the retention of this existing employment land and business uses, in so far as possible³⁸. However, the merits of proposals for alternative uses may be considered, where appropriate, in accordance with particular criteria (detailed in *Policy E2: Employment Land*).
- 3.2.5 While the Council currently has the means to explore the protection of existing employment land from further losses to residential uses or other uses under

³⁸ Offices (formally Class B1 now Class E(g)(i-iii) use) may now change to other Class E Commercial, Business and Service uses without the need for planning permission, following the amendment to the *Town and Country Planning (Use Classes) Order 1987* which came into effect on 01 September 2020.

permitted development rights through interventions as such the Article 4 Directions, proposed changes to the NPPF³⁹ suggest that the scope and ability to use such means to control permitted development rights will be reduced. However, it may be possible to restrict changes of use through planning conditions where appropriate.

Supporting the Marine and Maritime Sector

- 3.2.6 The maritime sector is vital to Portsmouth's and the UK's economy; its direct economic impact is estimated to be £2.1 billion (bn) per annum nationally, with an additional £1.4bn per annum in wider induced spending⁴⁰. The Government's *Maritime 2050 Strategy* (2019) identifies a shortage of waterfront marine employment sites and notes very significant role that the Solent region plays in underpinning the UK's maritime economy.
- 3.2.7 Portsmouth has a number of waterfront locations with access for marine activity at a range of scales, from the Portsmouth International Port (PIP) and the HM Naval Base to small marinas and industrial wharves. PIP handles significant volumes of cargo and passengers every year and is major contributor towards both the local and national economy, including support to indirect jobs and businesses in the shipping supply chain. The 20-year market forecast prepared for the new PIP Masterplan - based on trends, shipping patterns, customer business aspirations, local UK port competition analysis, global political changes, maritime legislation and commercial intelligence - predicts that growth is expected in many areas of the PIP's operational sectors, including the roll-on / roll-off (Ro-Ro) ferry business along with cruise and bulk cargo growth opportunities. Analysis identified that further investment and upgrades in the Port's facilities are required in the near future to maintain current port customers and cargo volumes, especially in the containerised cargo sector (delivered by Ro-Ro unaccompanied trailers). The Ro-Ro freight is expected to increase in-line with the organic national growth and additional shipping volumes due to short sea shipping redistribution as result of Brexit; additional customs checks are also likely to increase storage time within the terminal, putting additional pressure on the existing storage space within the port. It is suggested that an additional 4ha of land for trailer storage (B8 Use Class) would be required by 2023/24 rising to a minimum total of 6ha by 2031.
- 3.2.8 Identification of marine and maritime employment land⁴¹ / waterfront access sites is essential to protect this economically important infrastructure and the specific land use and locational requirements of the sector, both as part of the Solent economy and to help meet national infrastructure needs. Safeguarding employment locations specifically for marine uses, including a potential marine

³⁹ MHCLG (2021) *Draft NPPF for Consultation*, para. 53.

⁴⁰ CEBR (2019) *Impact of the Maritime Sector*

⁴¹ The draft Portsmouth Local Plan defines this as employment uses and land (Use Class B2: General Industrial; B8: Storage or Distribution and Class E(g)(i)) at identified waterfront access locations or associated land.

employment hub of national significance at Tipner or additional employment land north of the city centre, could potentially help enable a small proportion the additional capacity required by the sector to be met within the city or promote clustering and co-location of maritime, defence and aerospace sectors and related services (marine research and development for instance), as well as the possible development of related innovation quarters or enterprise zones.

3.2.9 Land at the sites listed below (and in Policy E2) are proposed to be safeguarded for marine and maritime employment uses and/ or related uses:

- **Portsmouth International Port:** owned and operated by Portsmouth City Council, the commercial port serves continental ferries, commercial container ships and a growing cruise ship market. It has a number of wharves, a terminal building and ancillary facilities. Existing employment land in proximity to the Port on the western side of the M275 remains suitable for such uses in principle and is well located for marine and maritime related uses. In addition, *Policy S1: Portsmouth City Centre* presents an option for new employment land in the north of the city centre regeneration area to the south of the Portico terminal.
- **HM Naval Base land:** The naval base is home to two-thirds of the Royal Navy's surface ships and includes office buildings and lodging facilities for personnel. The site dominates much of the western corridor of Portsea Island and is one of the city's major employers. The site will be safeguarded for marine employment related uses. The allocation in *The Hampshire Minerals and Waste Plan (2013)* under Policy 34 for a potential aggregate wharf (should the site become available in the longer term) would be retained.
- **Tipner West (and Horsea Island):** the Tipner area is proposed for redevelopment a sustainable waterside community, centered around a regional level marine employment hub with deep water access. There is also potential for marine employment uses in the south-eastern edge of Horsea Island, subject to the provision of connecting infrastructure from Tipner. The broad area has potential for development as a recognised 'Innovation Quarter' or Marine Enterprise Zone (MEZs). The MoD has retained the Defence Diving School on Horsea Island UK's centre for military diving training, which includes a 1k rectangular lake originally created for torpedo testing. While this site is not currently indicated for release, its location could also potentially support an element of marine related employment or leisure uses as part a mixed-use scheme in future.
- **Ben Anslies HQ, The Camber:** The Camber is currently in use as for specialist yacht manufacture and associated office space with direct access to the harbour.
- **Kendalls Wharf, Eastern Road:** an aggregate import wharf (marine-won sand and gravel) with associated processing infrastructure, safeguarded by the *Hampshire Minerals and Waste Plan Policy 19: Aggregate wharves and rail depots*.

- 3.2.10 There are also a number of marine leisure related uses in Portsmouth including sailing and water sports clubs. Any development proposals in such locations would be considered under *Policy C1: Community and Leisure Uses*.

Providing sufficient employment space: need assessment

- 3.2.11 The employment land forecasts for the new Local Plan use economic forecasting data⁴² as a baseline with appropriate adjustments to take account of for the city's growth aspirations, sectoral strengths and past employment land take up, with the addition of a 5-year margin for flexibility.
- 3.2.12 The assessment of need for additional office space draws on one of the core aims of the *Portsmouth Regeneration and Economic Development Strategy*: **to provide an additional 7,000 jobs in the city by 2026**. Table 9 (in Appendix E) shows how proportional growth and reduced losses have been applied to the sectors where the Council has existing identified objectives for local interventions. In terms of industrial land, the recommended approach ensures a positive growth strategy for Portsmouth's specialist sectors, based on past gross completions (2007-2019). A gross total (as opposed to a net total that accounts for gains and losses) allows scope for redevelopment and regeneration of existing industrial areas to contribute to the employment floorspace need target (given the constraints on land in the city), and encourages the renewal of the city's older facilities. Together this resulted in a projected need for **90,600 sq m net of office floorspace** (Class E(g)(i-iii) and **87,100 sq m gross industrial floorspace** (a mix of Class B2 General Industrial and B8 Storage or Distribution); a total of **177,700sq m** for the *2016 - 2036* period inclusive of five-year buffer to provide flexibility and choice in the market.
- 3.2.13 A more recent study of employment need undertaken on behalf of all PfSH authorities⁴³ reported a similar need for office space but recommended a substantially higher projected need for industrial floorspace (210,214sq m (net) up to 2040); this was based on the last five years of higher net completions, believed to reflective of a recent strengthening in the market. In Portsmouth this period including some 'one off' substantial Council-led schemes which were removed as 'outliers' in the previous assessment's 10-year projection. In this current period of certainty for forecasting, the lower target of 87,100 sq m estimated from a longer period of past delivery, may be more robust and deliverable as the recommended industrial land space target for Portsmouth.
- 3.2.14 However, it is acknowledged that there is potentially a need to keep the city's employment floorspace forecast need under review to take account of the economic, sectoral and/ or lifestyle shifts due to the pandemic, such as a potential

⁴² Oxford Economics 2017 reviewed by GL Hearn (May 2020) *Portsmouth City Employment Land Forecasting*

⁴³ Stantec (2021) Economic, Employment and Commercial Needs (including logistics) Study For Partnership for South Hampshire.

continuation of a proportion of the workforce working from home, impacting on the demand for office space, as well as to consider up to 2038. However, updating these figures or undertaking further economic modelling at this time may not be robust while the full extent of the impacts of the Covid-19 pandemic are still ongoing and not yet fully known; an appropriate employment floorspace target for the city will continue to be explored and assessed as the draft Local Plan progresses.

Providing sufficient employment space: supply assessment

- 3.2.15 The Council's *Housing and Economic Land Availability Assessment* (HELAA), informed by an *Employment Land Review* of the city and a 'Call for Sites', has identified and appraised all possible sources of new housing and economic land. The proposed key sites for the delivery of employment land requirements for the plan period are identified in Table 4. This includes 60,000 m of proposed marine employment uses at Tipner and Horsea Island which, in part, also contributes toward a national and regional level need from the all tide level deep water access the site would provide, if developed as new marine employment 'hub of excellence'; the balance between local and national need will be investigated further. As shown in Table 2, the total employment land supply for the plan period will be approx. 190,000 sq m, including an element of regional/ national need.
- 3.2.16 At this stage, these figures represent an estimate of the possible employment land delivery; some of these sites may deliver more of a mix of employment and commercial uses and will require further assessment to refine the deliverable employment capacity. Nevertheless, it is still considered that a choice of sites (as far as practicable) should be identified to ensure that the supply of employment land is not restricted in future, to provide a range of accessible options for local employment (for the plan period and beyond) and to help reduce out-commuting.
- 3.2.17 Further testing of the evidence underlying the employment floorspace targets and capacity for the plan period will be carried out to support the 'Regulation 19' publication draft of the Portsmouth Local Plan.

Table 4 - Employment Land Supply for the Plan Period

Source		New Employment Land (sq m)		
		Office	Mixed Industrial & Storage	Total
Net permissions outstanding as at 31 March 2020 ⁴⁴		7,174	5,321	12,495
Strategic Employment Sites:	<i>City Centre</i>	20,000	-	20,000
	<i>Lakeside North Harbour</i>	50,000	-	50,000
	<i>Cosham</i>	-	5,000	5,000
Strategic Marine Employment Sites:	<i>Tipner West and Horsea Island</i>	-	60,000	60,000
Other sites identified in the HELAA		25,350	18,000	43,350
Total		102,524	88,321	190,845
<i>- of which is identified as marine employment land:</i>		-	60,000	60,000
Total non-marine employment land		102,524	28,321	130,845

DRAFT STRATEGIC POLICY E2: EMPLOYMENT LAND

- 3.2.18 Policy E2 sets out the targets for the provision of new employment land, identifies the key areas for the delivery for employment space and safeguards the city's existing business, employment and marine and maritime related employment areas.
- 3.2.19 To enable employment locations to grow and change, it is recognised that other uses can also provide employment opportunities and may enhance the appeal of employment areas by offering complimentary services for local businesses and/ or employees. Policy E2 therefore also sets out the circumstances under which the loss of designated employment land may be permitted.

Policy E2: Employment Land

Sustainable economic development and regeneration in Portsmouth will be supported by the provision of a flexible supply of office, industrial and storage floorspace

To support the Council's ambitions to create an additional 7,000 jobs in the city, a minimum of **90,600 sq m** of office floorspace (Class E(g)(i-iii)) and **87,100 sq m** of mixed office, industrial and warehouse employment floorspace (Class B2/ B8) would need to be delivered. This is to include/ the addition of **60,000sq m** of

marine employment floorspace. This is anticipated to be delivered in the following locations:

Key Employment Sites and Marine Employment Land:

<p>1. City Centre See Policy S1</p>	<p>The city centre is a key location for new office space, within close proximity to the University of Portsmouth faculties. The regeneration of Portsmouth City Centre is considered to have the potential to deliver new employment and commercial uses as part of a vibrant mix of new uses, including potential for delivery beyond the plan period.</p>
<p>2. Lakeside North Harbour See Policy S6</p>	<p>Portsmouth's premier business location is suitable for high quality employment uses suitable for an A Grade office location, plus a mix of ancillary and/ or supporting uses.</p>
<p>3. Tipner West and Horsea Island See Policy S2</p>	<p>The potential deep-water access the site would provide presents a unique opportunity for a marine employment hub of national significance. The site could deliver at least 60,000 m of mixed employment uses⁴⁵. A potential a mix of B2/ B8 or commercial office space where such uses would not conflict with the wider aspirations for the new community (See Policy S2: Tipner).</p>
<p>4. Portsmouth Town Centres and Cosham Site Allocation See Policy E6 and S4</p>	<p>Employment uses suitable for a town centre location are encouraged within the boundaries of the town centre areas and the Cosham Strategic Site Allocation area.</p>
<p>5. Existing employment land (shown on Figure 4)</p>	<p>Premises in extant use for business and employment uses within the city's existing industrial estates and business parks are protected for continued office and employment uses and ancillary uses. Redevelopment of older facilities and intensification of use will be supported in principle.</p>
<p>6. Portsmouth International Port</p>	<p>Land at the Port will be protected for uses directly relating to the port, and other marine and maritime related employment uses or operations.</p>
<p>7. HM Naval Base land</p>	<p>Land should be retained for marine and maritime activities and marine employment uses and/ or related employment and supporting uses as appropriate.</p>
<p>8. The Camber Docks (BAR Headquarters)</p>	
<p>9. Kendalls Wharf</p>	

Conditions attached to planning permissions in key locations may be used to limit changes of use.

Development of the identified sites for alternatives uses will only be permitted if it can be demonstrated that:

1. The proposal would not significantly limit the deliverability of the identified employment land requirements for the plan period. Impacts on deliverability would include both the direct loss of employment land, and/ or adverse impacts on the viability, operation or amenity of existing employment uses or allocated employment land;
2. The application site is no longer suitable or viable for employment uses, and there is evidence of substantial, unsuccessful marketing of the site for employment uses;
3. The proposed use would support the wider employment role of the area and be ancillary to the primary use of the location; and
4. Generate job opportunities at least equivalent to that of the extant employment use.

Any proposals for a change of use to other main town centre uses⁴⁶ on allocated employment land outside of Portsmouth's identified town centres, of more than 280sq m net floorspace, would also be subject to the tests in *Policy E5: Portsmouth Centre Hierarchy and Main Town Centre Uses*.

Policy Monitoring	
Policy Aim	Key Indicator
<ul style="list-style-type: none"> ➤ To deliver 90,600 sq m of net additional office floorspace and 87,100 sq m of gross mixed office, industrial and warehouse to include/ the addition of 60,000 sq m of marine employment. 	<ul style="list-style-type: none"> - Annual monitoring of employment floorspace gains and losses from planning applications, and the cumulative net floorspace figure for the plan period. - Planning applications refused in accordance with Policy E2 due to loss of employment land.
<ul style="list-style-type: none"> ➤ To deliver new employment uses at the key employment locations (Sites 1-5). ➤ The protection of strategic marine employment locations (Sites 3 & 6-10) 	<ul style="list-style-type: none"> - The delivery, quantity and type of proposals permitted at the identified key employment sites.

Further Information:

- GL Hearn (May 2020) *Portsmouth Employment Land Needs Review*
- PCC (2021) *Housing and Economic Land Availability Assessment*
- CEBR (2019) *Impact of the Maritime Sector*

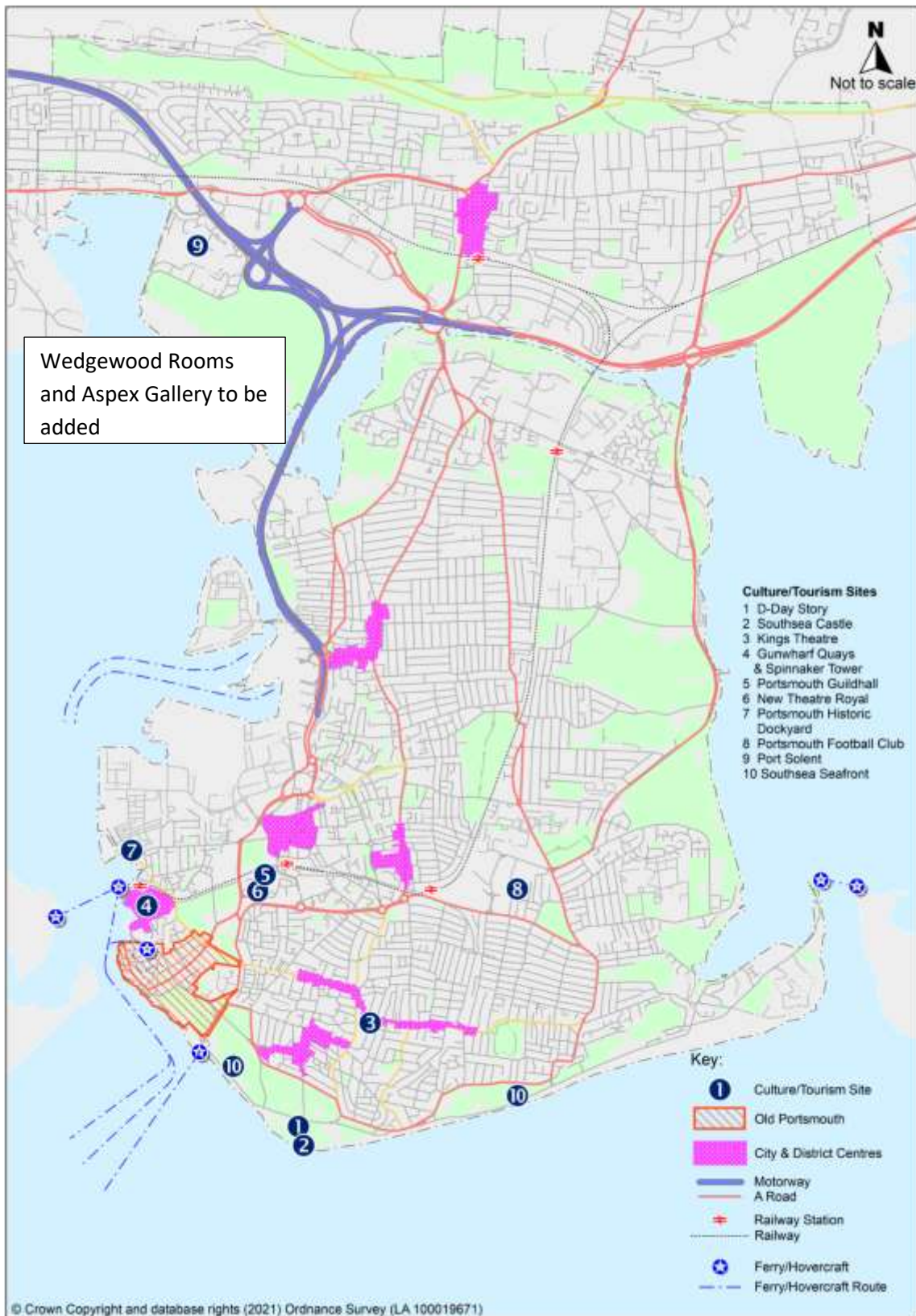
Question 12 - Employment land

- a. Do you agree with the approach of the draft Policy E2?
- b. If not what changes would you suggest and why?

⁴⁶ As defined in the *National Planning Policy Framework Glossary*.

3.3 Culture and Tourism (Policy E3)

Figure 6-Culture, Tourism & Leisure Map



3.3.1 Portsmouth's unique heritage and coastal environment, together with sporting, arts and music events, offer a distinct cultural setting for the city.

3.3.2 Portsmouth has a wealth of attractions, including:

- Southsea seafront and common; Victorian seaside resort with ever-changing sea views across the Solent, family attractions and activities.
- Over 800 years of maritime, defence and literary heritage found at sites across the city; The Portsmouth Historic Dockyard⁴⁷ attractions, Old Portsmouth, The D-Day Story, Southsea Castle, Old Portsmouth and other defence fortifications (Hilsea Lines, Fort Cumberland, Fort Purbrook and Fort Widley) as well the Charles Dickens Birthplace Museum and the Sherlock Holmes exhibition at the Portsmouth Museum.
- Gunwharf Quays Designer Outlet; waterfront shopping and restaurants overlooking the harbour.
- Spinnaker Tower; a landmark tower with magnificent views of Portsmouth Harbour, the Solent and the city.
- A growing programme of high-quality national and international events; such as Victorious Festival, the Great South Run, Americas Cup World Series and various food and drink festivals and markets.
- A wealth of cultural attractions and connections; theatre and performance venues (The Guildhall, The Kings Theatre, the New Theatre Royal) and a number of art galleries (including the Hotwalls Studios) and arts communities.
- Portsmouth Football Club at Fratton Park.
- A marina and boardwalk style development at Port Solent with shops, restaurants and leisure facilities.
- An eclectic range of independent eateries clustered in Southsea Town Centre and Albert Road/ Elm Grove.

Why is this policy needed?

3.3.3 National planning policy requires that strategic policies make sufficient provision for cultural infrastructure, which in Portsmouth is also closely linked to the enhancement of the historic environment. There is a body of research to support the idea that cultural assets and heritage can help to generate a 'sense of place' and belonging and counter feelings of social isolation.⁴⁸ Tourism is also crucial to Portsmouth's economy; Portsmouth welcomes around 9.3 million visitors per year,

⁴⁷ Including the Portsmouth Historic Dockyard attractions in Gosport

⁴⁸ Historic England (2018) Wellbeing and the Historic Environment

contributing £610.3 million to the local economy (2015) and supporting more than 12,000 jobs.

- 3.3.4 The Council's *Economic Development and Regeneration Strategy* aims to support culture-led regeneration through a focus on investing in and strengthen the visitor and creative industries sector (including the computer games industry). There have already been major improvements to the city's tourism offer in recent years including the re-opening of the Mary Rose Museum in the Historic Dockyard, the Hotwalls Studios in Old Portsmouth, the transformation of The D-Day Story (museum) with the installation a significant WWII landing craft⁴⁹ and interactive water-feature in front of Southsea Castle. The Guildhall area in the city centre has potential for further enhancement as a cultural destination given the existing cluster of venues including the New Theatre Royal, Central Library site, Guildhall Walk's evening offer and the public space of Guildhall Square (See *Policy S1: City Centre*). There is also significant scope to enhance the offer and public realm at along the seafront as part of the new flood defence works and other key regeneration opportunities (See *Policy S8: The Seafront*).

DRAFT STRATEGIC POLICY E3: CULTURE, TOURISM AND LEISURE

- 3.3.5 Portsmouth's existing attractions should be protected and enhanced for their social and cultural value and contribution to fostering local pride and social cohesion within Portsmouth. Enhancement will also support the Council's aims to build the city's appeal and reputation as a tourism destination and to help support the diversification of the city's economy.

Policy E3: Culture, Tourism and Leisure

Proposals to develop or enhance cultural and tourism facilities⁵⁰ will be supported in principle, as appropriate. New or enhanced facilities are particularly encouraged at the following locations:

- City Centre, Guildhall Square and Guildhall Walk
- Gunwharf Quays
- Portsmouth Historic Dockyard
- Southsea Seafront
- Port Solent
- Fratton Park
- Portsmouth's Town Centres

⁴⁹ Landing craft LCT7074

⁵⁰ Including but not limited to appropriate uses from those defined under *Class F: Local Community and Learning* or *Class E - Commercial, Business and Service*.

The loss of cultural and tourism facilities in Portsmouth, and/ or proposals for alternative uses in the above areas, will only be granted where it can be demonstrated that there will be no significant harm to the role these centres play in the cultural life of the city, including adverse impacts on their special character or function.

The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations is encouraged, particularly in town centre locations. Such proposals should add vibrancy to the street frontage and enhance the public realm where possible.

Policy Monitoring	
Policy Aim	Key Indicator
➤ To protect and enhance identified tourism attractions and cultural assets	- Planning applications refused in accordance with Policy E3.
➤ To encourage new cultural and tourism activity	- Planning applications granted for new cultural and tourism related facilities

Further Information

- PCC (2019) *Economic Development and Regeneration Strategy* (2019-36): <https://www.portsmouth.gov.uk/services/council-and-democracy/policies-and-strategies/economic-development-and-regeneration-strategy/>
- PCC Regeneration projects: <https://www.portsmouth.gov.uk/ext/development-and-planning/regeneration/regeneration>
- PCC Tourism Marketing Communications Plan 2021-2022
- Visit Portsmouth website: <https://www.visitportsmouth.co.uk/>

Question 13. Culture and Tourism

- Do you agree with the approach of the draft Policy E3?
- If not what changes would you suggest and why?

3.4 Supporting Town Centres

3.4.1 Portsmouth's town centres provide an essential network of accessible shops, services and community facilities. This includes Portsmouth City Centre (inc. Gunwharf Quays), Southsea, Cosham, North End, Fratton and Albert Road and Elm Grove as well as number of smaller Local Centres distributed throughout the city.

3.4.2 There are also some significant 'out-of-centre' developments in Portsmouth offering a mix of outlet and warehouse retail, leisure and entertainment facilities. Notable sites include Port Solent, Portsmouth Retail Park at North Harbour, Ocean Park in Copnor and the Pompey Centre in Fratton.

3.4.3 The Local Plan's approach to retail and town centres includes:

- Portsmouth's hierarchy of town centres (Policy E4) and their boundaries, key frontages and suitable uses (Policy E5);
- The planning requirements for 'out-of-centre' proposals, currently required by national policy guidance (Policy E4); and
- Strategic Site Allocations for the regeneration of Portsmouth City Centre, including provision of commercial floorspace (Policy S1) and opportunities for new homes and employment space in Cosham (Policy S4).

The Future of Town Centres

3.4.4 Over the last decade retail occupation in Portsmouth Centres has largely reflected the trends seen in the retail sector nationally; declines in the face of competition from online shopping, out-of-centre stores and the shift to other more 'experience' focused pastimes. Since the start of the Covid-19 pandemic, town centres have experienced rapid change, including an accelerated shift to online sales. The larger centres have been particularly affected, due to the combination of continued home working, restrictions on domestic and international tourism and the need for continued social distancing. However, research⁵¹ indicates that almost a third of UK consumers intend to visit local shops more frequently than they did before the crisis; a trend that could continue through altered work/ travel patterns and the renewed interest in supporting local businesses. Some local businesses have also been quick to respond to this challenge, offering free local delivery or collection services.

3.4.5 Early forecasts from Experian predict there will be a reduced need for retail floorspace due to weaker projections for spending and a stronger outlook for online sales; though it is currently unknown whether increased proportion of online sales will be a permanent shift. One more positive prediction for the high street is that online spending could peak at about 30% and then plateau as retailers adapt

⁵¹ GlobalData research, JLL *City Centre Masterplan Retail Statement* (2020)

to 'multi-channel retailing', where stores are used as a showcase for products, collection points for online orders or service/ storage locations, for instance.

- 3.4.6 Updated forecasts undertaken for the Portsmouth City Centre Masterplanning work (December 2020) indicate that there may be a need for a small amount of new retail floorspace (aprox. 3,000sq m) over the longer term (2031 onward) but no need for new 'convenience' retailing during the plan period. However, as this period of change and uncertainty continues, making medium to long-term predictions with any certainty is challenging. These forecasts will therefore be revised again as the draft Plan progresses.

Regeneration and Changes of Use

- 3.4.7 The Covid-19 pandemic has accelerated the pace of change in Portsmouth's centres. The Government has responded by enabling temporary permitted development rights for some activities (e.g. pubs providing takeaways), enabling key 'town centre uses' to change or mix without the need for planning permission - including a change of use to residential (for units up to 1500 sq m) under the 'prior approval' system without the need for full planning permission.
- 3.4.8 The new Class E⁵² in particular allows for a broader mix of uses that reflects the changing nature of town centres (e.g. a shop can change to a café or a café could include a recreational use such as ping pong without the need for planning permission⁵³). However, encouraging the retention of retail provision and other key services, where possible, could help to ensure there is a sustainable mix of uses to continue to support the life of centres, as part of a broad and flexible mix of other town centre uses.
- 3.4.9 The Council could explore attaching conditions to new development which would restrict changes of use where appropriate, which could potentially provide more certainty in terms of impact on centres and local amenity. Alternatively protection could be sought for key frontages through 'Article 4 Directions' that would remove permitted development rights in these areas, though the Government are due to limit their use to 'very specific circumstances'. Existing planning conditions regulating the use of the property will still apply, and any physical changes may still require full planning permission (which could be granted with their own restrictive conditions). Other means of controlling use and activity outside the planning system remain, such as property law constraints of restrictive covenants and terms of lease.

Question 14 - Supporting Town Centres - changes of use

- a. Should the Council seek to regulate future changes of use for town centre development where possible?

⁵² Class E Commercial, Business and Service: retail, food & drink, professional services, indoor sport, medical services, childcare, employment uses suitable for a residential area.

⁵³Physical alternations may still require full planning permission.

3.5 The Portsmouth Centre Hierarchy (Policy E4)

3.5.1 The 'Portsmouth Centre Hierarchy' sets out the city's town centres according to their function and catchment size. The centres in the Portsmouth hierarchy are shown in Figure 6.

Why is this Policy Needed?

3.5.2 Local Authorities are required to define a network and hierarchy of centres and set policies that support their long-term viability and vitality; including tests for assessing certain types of development proposals in locations outside of defined centres. This approach is to ensure that development is as sustainably located as possible and prioritises support for activity in existing town centres.

3.5.3 Under current planning guidance the Local Plan must also consider the need for new 'main town centre uses'⁵⁴ (such as retail, dining, leisure and entertainment, offices and culture and tourism development) during the plan period, or for a foreseeable period in terms of retail trends. While changes to Use Class definitions in 2020⁵⁵ mean that a town centre use, in any location, can now change to another without the need for planning permission, existing national planning policy requires sites in town centre locations to be prioritised for new town centre development and any changes of use that require planning permission⁵⁶.

Assessing Out-of-Centre Proposals

3.5.4 National policy requires a two-stage assessment process for proposals for new main town centre uses in 'edge-of-centre' or 'out-of-centre' locations, as follows:

3.5.5 Stage 1: The 'Sequential Test': requires applicants to prove they have prioritised the use of suitable, available or anticipated development locations within defined urban centres. A thorough assessment of alternative sites in centre or in edge-of-centre locations will be required to justify the out-of-centre location. Preference should be given to accessible sites that are well connected to the town centre.

3.5.6 Stage 2: Impact Assessment: there is an additional test for proposed out-of-centre retail and leisure development (exceeding 2500sq m). Applicants are required to determine whether the proposal would result in a significant adverse effect on existing centres, or upon existing or planned investment in centres. Impact Assessments only need to assess the uses likely to directly compete with the existing or expected offer in the relevant Portsmouth Centres.

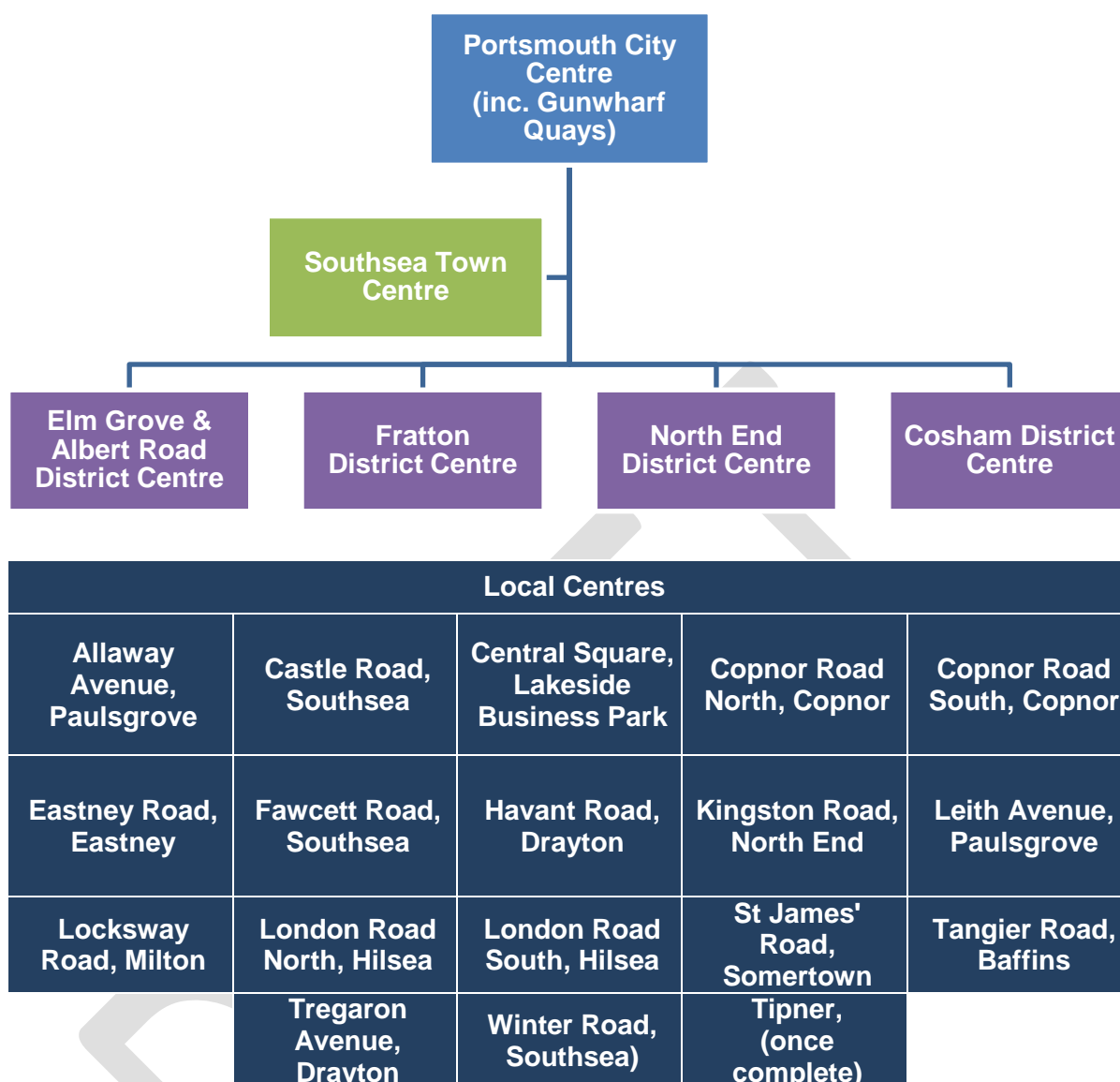
3.5.7 National planning policy guidance provides further detail on the assessment requirements.

⁵⁴ 'Main town centre uses' as defined in the glossary of the *National Planning Policy Framework*

⁵⁵ See section for i.iii for further details.

⁵⁶ Except where main town centre uses are identified as part of the Local Plan's Strategic Site Allocations.

Figure 7-Proposed Portsmouth Centre Hierarchy



3.5.8 The outline strategies for the centres are detailed in Section 3.3.1: *Portsmouth Town Centre Strategies*.

- 3.5.9 Policy E4 establishes the Portsmouth defined town centres as the preferred locations for new main town centre uses. Development proposals should be of a size and scale appropriate to a centre's position in the Portsmouth Town Centre hierarchy.
- 3.5.10 Proposals for main town centre uses located outside of the centre hierarchy (excluding any uses in-line with the Plan's proposed strategic site allocations), will be subject to the tests in this policy.
- 3.5.11 The need for, and scope of, assessment required on any out-of-centre proposals is strongly encouraged to be discussed with the Council at an early stage in the planning application process, particularly in view of any changes to national guidance.
- 3.5.12 The proposed approach to new development within each centre is set out in *Policy E5: Town Centre Strategies*.

Policy E4: Supporting Portsmouth's Town Centres

Proposals for main town centre uses (including retail, leisure and entertainment, arts, culture and tourism development) should be primarily located within the Portsmouth network of centres, in accordance with the hierarchy, as follows:

- Portsmouth City Centre (inc. Gunwharf Quays)
- Southsea Town Centre
- District Centres: Cosham, North End, Fratton and Albert Road and Elm Grove
- Local Centres: Allaway Avenue, Castle Road, Copnor Road North, Copnor Road South, Eastney Road, Fawcett Road, Havant Road, Kingston Road, Leith Avenue, Locksway Road, London Road North, London Road South, St James' Road, Tangier Road, Tregaron Avenue, Winter Road and Tipner (once complete).

Out of Centre Proposals

Proposals for main town centre uses of more than 280m⁵⁷, located outside of the Portsmouth centres, must provide a sequential assessment to demonstrate that there are no other suitable and available sites in centre, or in edge-of-centre, locations.

Out-of-centre proposals for retail and leisure uses above 2500sq metres will also be subject to a Retail Impact Assessment to demonstrate that there will no significant adverse impacts on existing centres, including the planned regeneration of Portsmouth City Centre (Policy S1).

Proposals that fail to satisfy the sequential test, or that are likely to have a significant adverse impact, will be refused.

Policy Monitoring

⁵⁷ Net floorspace.

Policy Aim	Key Indicator(s)
➤ To direct proposals for new main town centre uses to the Portsmouth Town Centre hierarchy.	- Location of new comparison retail, office and leisure floorspace granted planning permission (in-centre, edge-of-centre, or out-of-centre)

Further Information:

- PCC (2019) *Portsmouth Retail and Town Centres. Background paper for the Portsmouth Local Plan 2016-36 evidence base*
- JLL (2020) *Portsmouth City Centre Masterplan Retail Focus Statement*

Question 15 - Supporting Town Centres

- a. Do you agree with the approach of the draft Policy E4?
- b. If not what changes would you suggest and why?

DRAFT

3.6 Portsmouth Town Centre Strategies (Policy E5)

Figure 8-City, Town & District Centres Map



3.6.1 To stay as the heart of their local communities, town centres need to be able to adapt to changing socio-economic conditions and consumer trends to provide a suitable mix of uses, consumer choice and opportunities for local businesses and local employment. Equally as important, is the need to continue to provide focal points for the community to meet and form connections in the local area. Extensive research has shown that the quality of social and community networks are one of the key wider determinants of health and well-being⁵⁸.

Portsmouth Centre Strategies

3.6.2 The draft town centre strategies in this consultation document are intended to set out the overall principles for development. More detailed schemes for the centres will be implemented by other Council strategies (such as the Local Transport Plan) and projects (such as the Future High Streets Fund) as well as through planning guidance where necessary. Each centre strategy has been informed by an analysis of past sector trends, previous annual survey information and consultation responses and recent planning reform changes. The centre strategies include:

- The vision and broad principles for the future of each centre;
- Proposed centre and core area boundaries; and
- A broad indication of the preferred mix and location of uses.

3.6.3 The health of Portsmouth's centres will continue to be monitored annually where possible. The policy approach to town centres will also be reviewed as part of the periodic review of the Local Plan after five years.

⁵⁸ PCC (2021) *Health and Well-being background paper*

City Centre (Commercial Road and Gunwharf Quays)

Figure 9-City Centre - Commercial Road

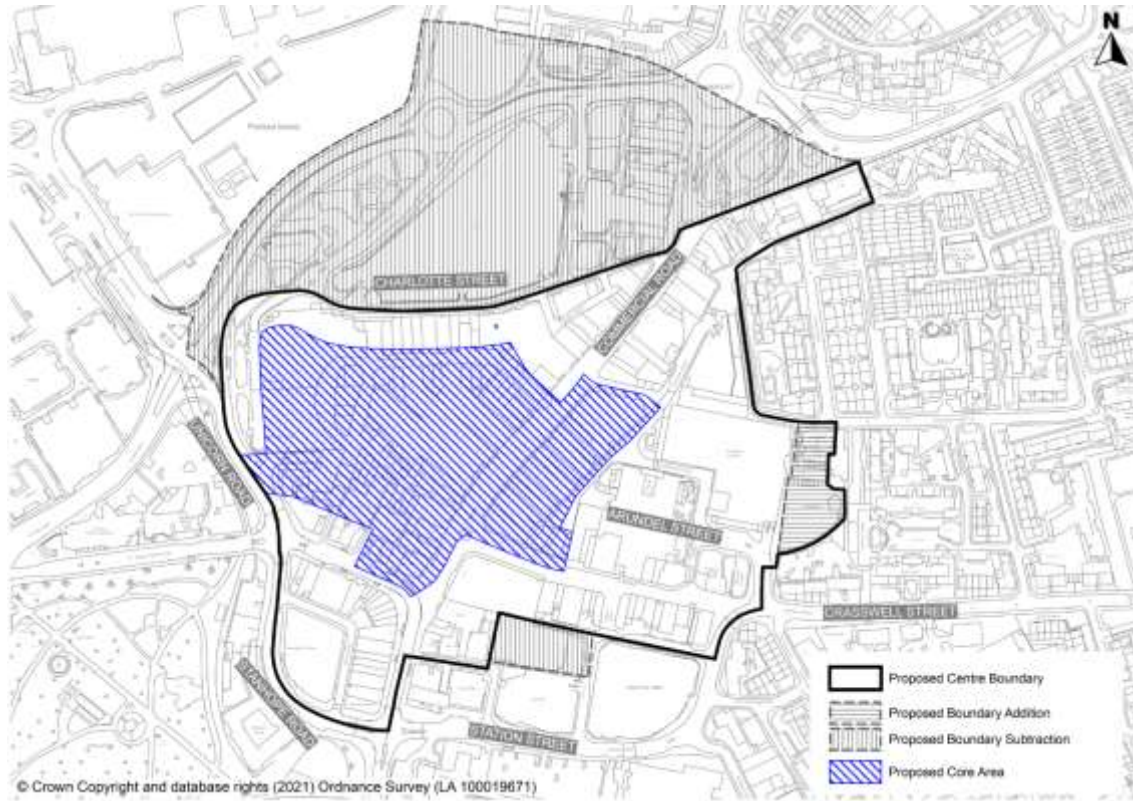
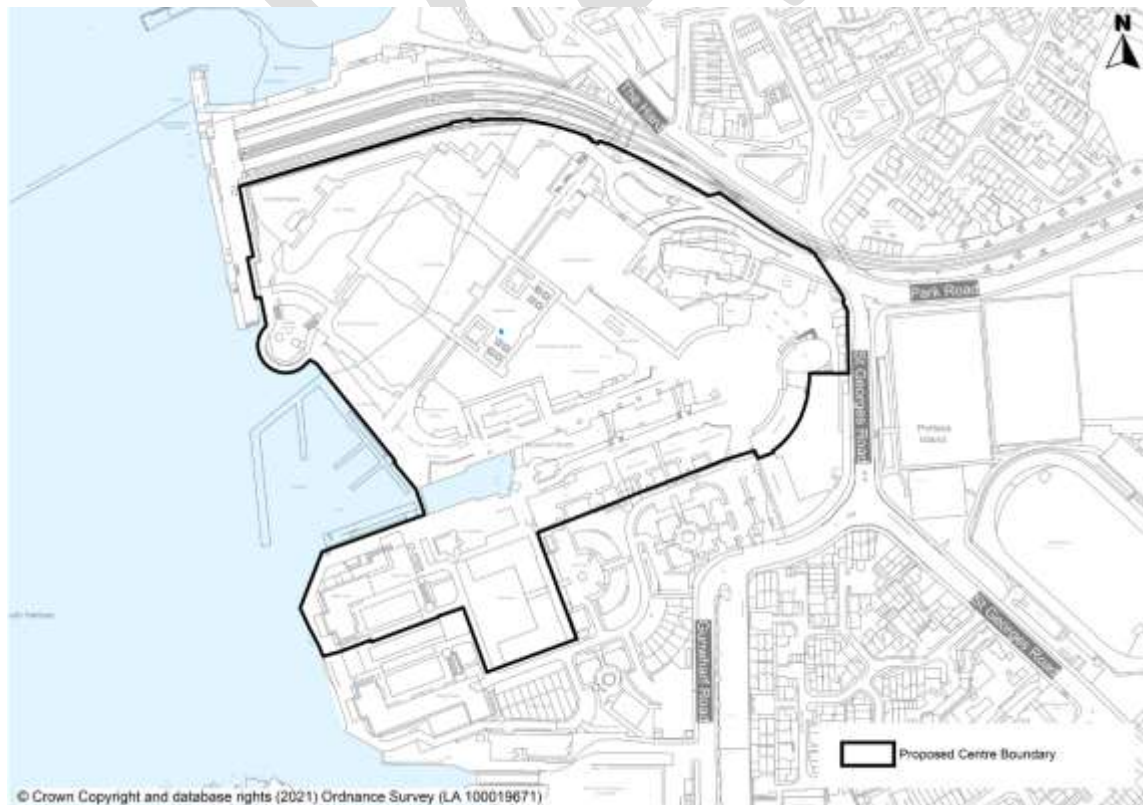


Figure 10-City Centre - Gunwharf Quays



- 3.6.4 There are two main shopping areas in Portsmouth City Centre: Commercial Road (Figure 9) and Gunwharf Quays (Figure 10). Commercial Road is a traditional pedestrianised 'high street' destination which includes the Cascades Shopping Centre and the connecting streets north of Station Road, including Arundel Street, Charlotte Street, and Edinburgh Road. The Gunwharf Quays Designer Outlet provides a waterfront shopping and leisure destination with a range of dining and evening entertainment options, which is able to draw visitors from across the south.
- 3.6.5 The southern part of Commercial Road has seen some significant change and investment in recent years from student accommodation for the University of Portsmouth, and some localised new businesses in response. However, the main shopping area has seen rising vacancy rates and declining visitor numbers in recent years. While this is due in-part to the decline of high street chain stores nationally over the last decade, the centre also has a notable lack of dining options, leisure and entertainment facilities, or any recognisable 'Central Business District' (CBD) area; this has resulted in little in way of an evening economy for the core Commercial Road area. The visitor experience is in need of improvement; entrances points (such as Portsmouth and Southsea train station lack a clear sense of 'arrival' with poor legibility in their on-ward routes through of the centre, little 'green infrastructure' provision and an unwelcoming atmosphere during the evening.
- 3.6.6 The broader City Centre area has been identified for significant regeneration; initial masterplanning and delivery strategy work has been undertaken to propose the form, type and scale of development and public realm improvements that could take place over the next 15 years. See draft *Policy S1: Portsmouth City Centre*.

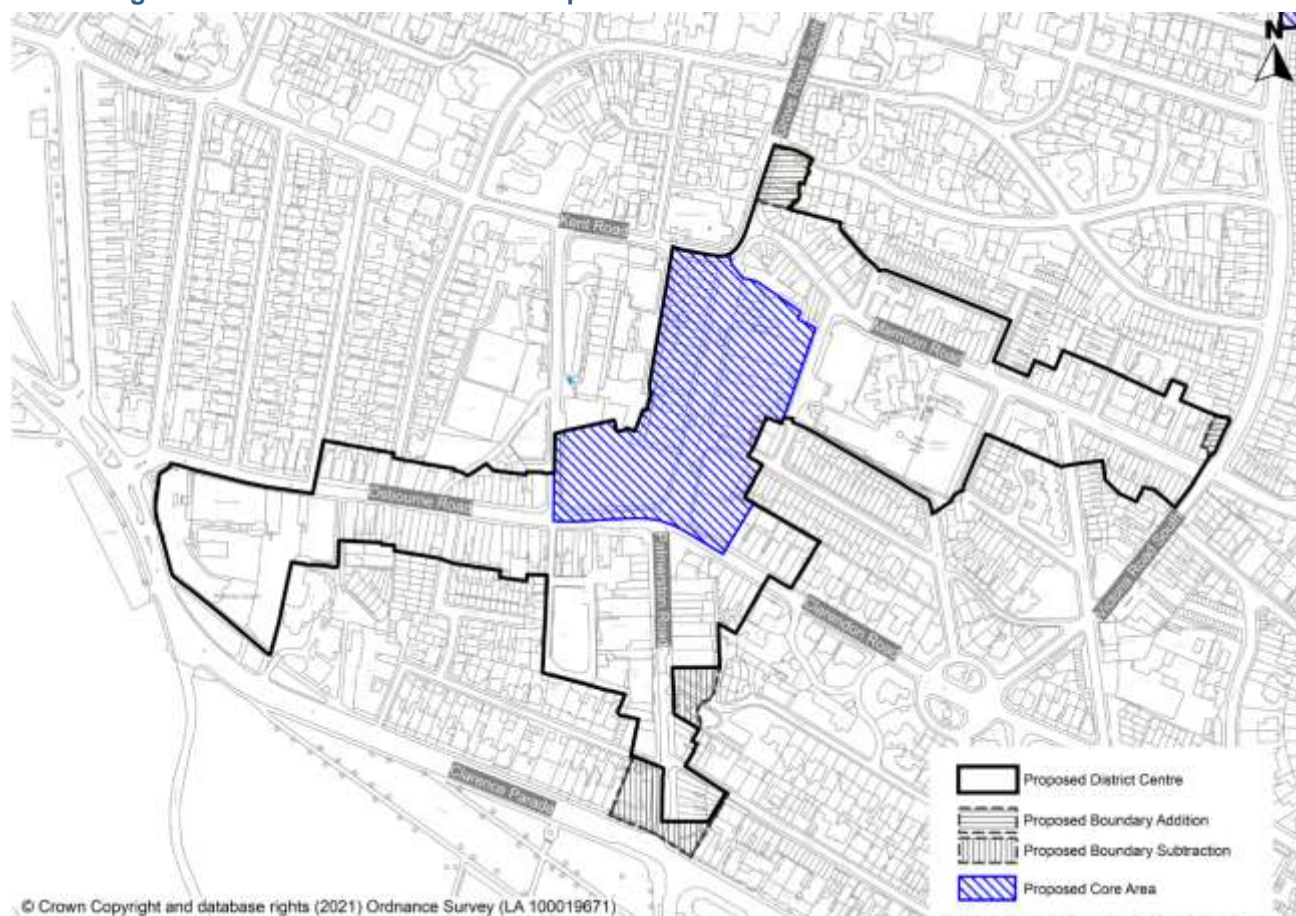
Proposed Centre Strategy and Vision

- 3.6.7 Draft vision from the draft *City Centre Development Strategy* (CCDS, 2020) for the wider city centre regeneration is:
- 3.6.8 "Portsmouth city centre will continue to be that heart of the city, and will be a beautiful, durable and adaptable place - more compact, more diverse, easier to get around, greener and healthier, and looked after by its happy residents".
- 3.6.9 The draft masterplanning work for the city centre proposes that the Commercial Road area has the potential to provide a diverse mix of ground floor retail, dining, leisure, and entertainment uses, supported by new residential dwellings and business space. This will be set within an enhanced public realm, spaces and connecting streets to create a vibrant and high-quality destination both during the day and into the evening.

- 3.6.10 An improved public realm would help to increase dwell time in the city centre, create a more appealing environment for businesses and potentially help to draw visitors from a wider catchment. Improved links (such signage, new pedestrian and cycle routes and/ or a more unified public realm style) to Gunwharf Quays would help promote footfall to both areas. Improved accessibility and public realm around key entrance points to the centre would improve the user experience and as well as initial perceptions of the area.
- 3.6.11 Development in the centre should strive to meet the needs of the local residents as well as opportunities to build upon the centre's proximity to the University of Portsmouth facilities and student accommodation. Overall the strategy for the Commercial Road area should seek to achieve a vibrant and successful core city centre area that provides for local residents, students, employees and visitors.
- 3.6.12 A mixed-use retail and commercial core area, centered on the Cascades Shopping Centre and immediate surrounds on Commercial Road, would encourage a broader range of uses while seeking to retain a recognisable 'core shopping area'. A mix of commercial, social and leisure uses would be encouraged to locate around this commercial core area. The inclusion of community and health facilities would also help support the new residential population. See *Policy E5: Town Centres Strategies* and *Policy S1: Portsmouth City Centre* for further details.
- 3.6.13 Gunwharf Quays' should continue to offer successful a mix of retail, dining, leisure and entertainment, in-keeping with the high quality urban realm and waterfront location. Other uses would also be supported on the upper floors (e.g. employment, residential or hotel uses) where this does not conflict with the site's outlet shopping function and entertainment offer.

Southsea Town Centre

Figure 11-Southsea Town Centre Map



- 3.6.14 Southsea Town Centre is focused around the Palmerston Road, Marmion Road and Osbourne Road frontages, and includes a Waitrose supermarket and car park. The Centre is a mix of national high street chains and independent shops. Southsea Town Centre is surrounded by and lies partly within the Owen's Southsea Conservation Area, characterised by its 'villa suburb' style.
- 3.6.15 The southern and western part of the centre (Palmerston Road south and Osbourne Road/ Clarendon Road) is a popular evening destination with a range of restaurants and bars. The pedestrianised precinct on Palmerstone Road hosts a number of popular markets throughout the year. Centre footfall is boosted by its location opposite Southsea Common and seafront, especially during events in the summer months.
- 3.6.16 To date, the centre has generally had a low proportion of vacancies in the main shopping area and is well supported by a broad mix of town centre uses throughout the centre. However, the level of vacancies in the centre have been gradually increasing over time (though at a relatively minor scale) and annual visitor numbers are declining. The pedestrianised high street environment itself is largely undistinctive, though it has benefited from new shop fronts and the

creative meanwhile uses of vacant plots/ stores in recent times. The former department stores on the corners of Palmerstone Road/ Osborne Road present major redevelopment opportunities to bring change into the centre.

Proposed Centre Strategy and Vision

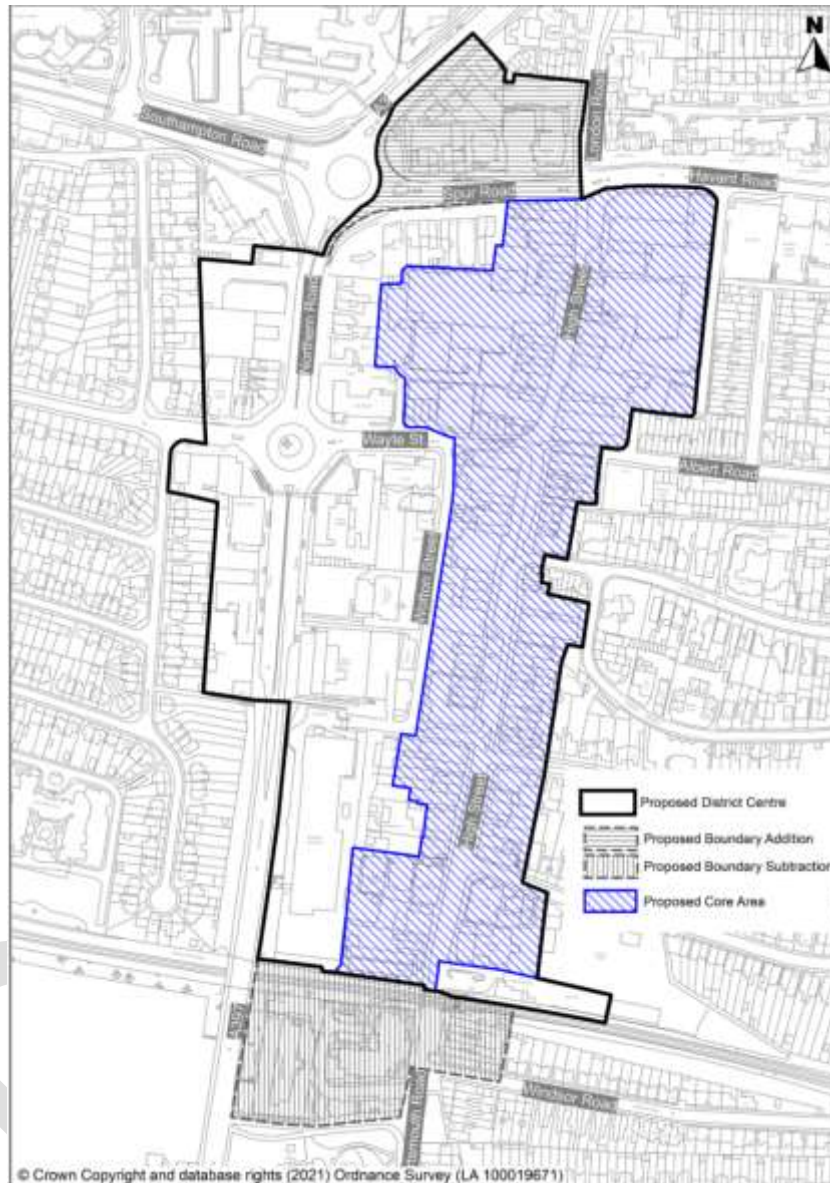
- 3.6.17 The Council will seek to retain and enhance the centre's appeal as a visitor destination, continuing to protect local amenity. Although there is a need to ensure there is a diverse mix of uses overall, the centre's food offer (currently led by seasonal markets, the restaurant/ cafe quarter) could continue to be a key theme for the future of the centre. Public realm interventions (including opportunities for public art) could also help to create more visual interest in the high street environment.
- 3.6.18 All new development within Southsea Town Centre should enhance the appeal of the centre, encourage longer visits and respect the character of the Conservation Area setting.
- 3.6.19 **Draft vision:** A vibrant destination for visitors and the local community, known for its high quality environment, independent dining and retail offer.

Proposed Centre Boundary and Key Frontages

- 3.6.20 Figure 11 shows the proposed boundary of Southsea Town Centre with a core commercial area. Minor revisions have been made to the existing centre boundary to incorporate the existing, long established commercial uses on the edge of the centre in Grove Road South and Victoria Road South, and to remove the peripheral residential properties facing Clarence Parade at the southern end of Palmerstone Road.

Cosham District Centre

Figure 12-Cosham District Centre Map



- 3.6.21 Cosham is part-pedestrianised centre spread over two parallel main roads (High Street and Northern Road) and their connecting side streets in the north of the city, adjoining Cosham Station and railway line to the south. Cosham High Street is a traditional precinct characterised by national chain stores with some independent traders. The Northern Road (A397) half of the centre is characterised by large, low-density development, divided by the Northern A Road. Prior to the pandemic, a shuttle bus ran from the centre to the nearby Lakeside Business Park during the week.
- 3.6.22 Cosham serves the local community as the only District Centre located on the Portsmouth mainland. The centre had seen visitor footfall steadily increase in recent years, boosted by markets on the pedestrianised part of the High Street.

- 3.6.23 There is scope to improve the appearance of the centre; buildings of poor architectural quality, poor public realm and 'grey' infrastructure dominate the environment in some areas. There is also poor connectivity in places; either due to a lack of clear signage or through physical barriers (such as main roads, the railway line, or the orientation of the built environment) and a lack of integration with key community facilities such as the Cosham Library (Spur Road) and the Cosham Community Centre and medical facilities (Wootton Street).

Proposed Centre Strategy and Vision

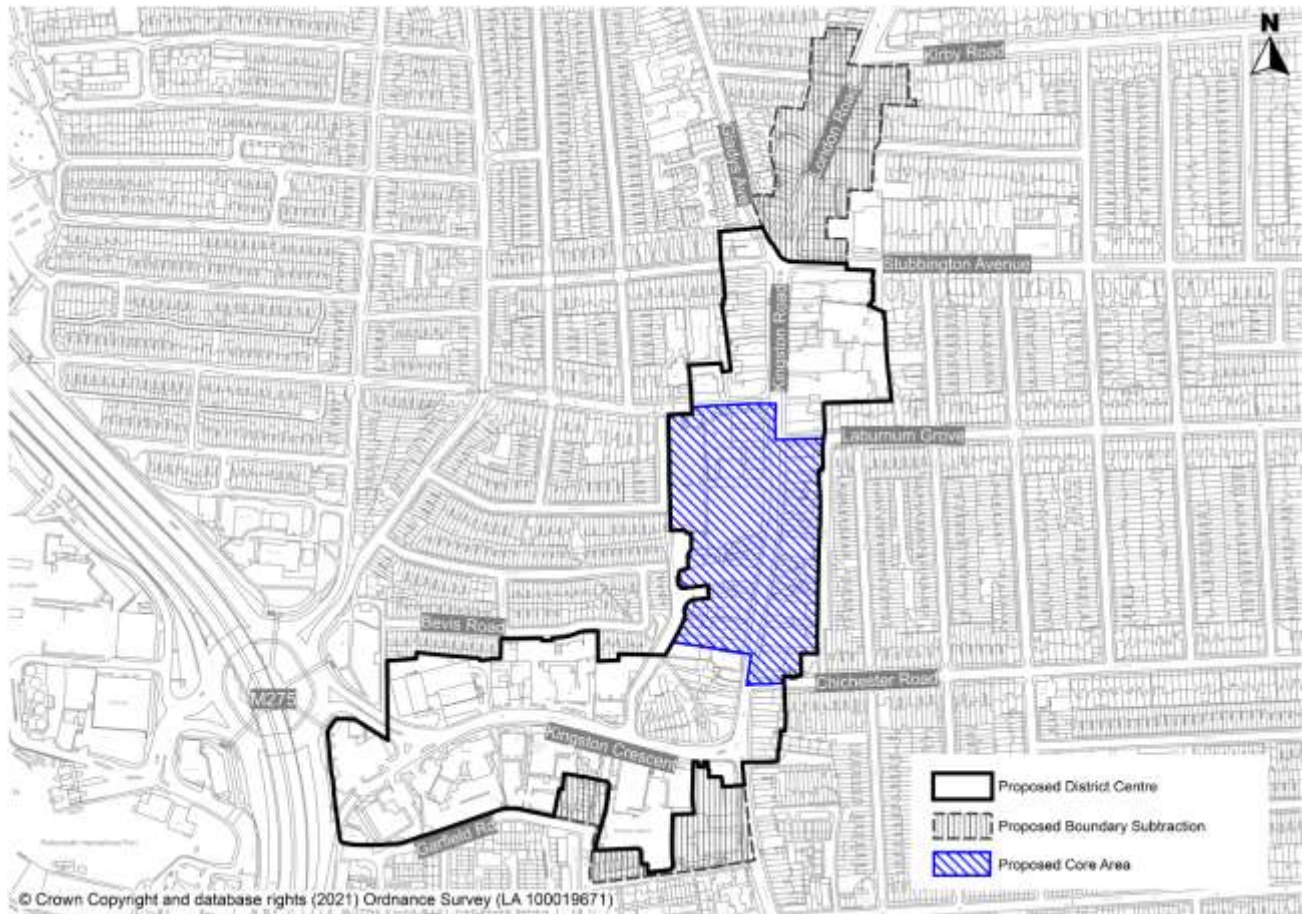
- 3.6.24 A strategy for the future of the centre should focus on providing a quality mix of retail and town centre uses, improving the environmental and visual quality of the centre and improved integration with the local area. Development in the centre should strive to maximise sustainable transport opportunities presented by the train station (including potential for a new sustainable transport 'mobility hub') and provide clear connections to nearby facilities and features where possible.
- 3.6.25 Supporting and enhancing the environment for existing and new activities such as markets and other events on the pedestrianised part of high street could help bring life and additional footfall to centre, and may help to simulate some greater diversity in the high street offer.
- 3.6.26 **Draft Vision:** A successful local hub featuring a quality mix of high street and independent traders, community facilities and employment space, set within an accessible, high quality environment.

Proposed Centre Boundary and Retail Frontages

- 3.6.27 Reducing the core commercial area to a more focused area around the northern, pedestrianised part of the High Street would reflect the existing distribution of uses and encourage opportunities for a wider range of main town centre uses throughout the rest of the centre. It is also proposed to realign the overall centre area: extending northward to include the library and adjoining commercial plots north of the Spur Road and removing the more peripheral units south of the railway line.
- 3.6.28 Land fronting Northern Road will be retained within the centre boundary; the area presents opportunities for redevelopment where existing services could be re-provided, or where it can be demonstrated that they are no longer required. Several of the sites in the locality have planning permission, or have been identified for, redevelopment during the plan period. Additional dwellings and new or redeveloped employment space in this location would help support the viability of the centre's core area. See *Strategic Site Policy S4: Cosham*.
- 3.6.29 Figure 12 shows the revised Cosham District Centre boundaries.

North End District Centre

Figure 13-North End District Centre Map



- 3.6.30 The North End District Centre is focused around London Road (A2047), one of city's main north-south routes. The area has traditionally had a strong presence of independent traders mixed with some national chain stores. The centre extends to the south-west to include Kingston Crescent's broader mix of uses, including offices, medical facilities and a hotel. The centre currently supports two large value supermarkets.
- 3.6.31 Analysis found that although retail provision in North End has steadily declined since 2012, the centre has shown some signs of economic recovery in recent years (fewer vacancies). There some notable clusters of uses that could help build identity for parts of the centre, such as the office and technology uses in Kingston Crescent's (Portsmouth Technopole and The Connect Centre).
- 3.6.32 The centre's environment has been identified as in need of improvement; congestion on Fratton Road (A2047) creates a poor environment for pedestrians and cyclists, air quality issues, noise and little in terms of green space or street greenery.

Proposed Centre Strategy and Vision

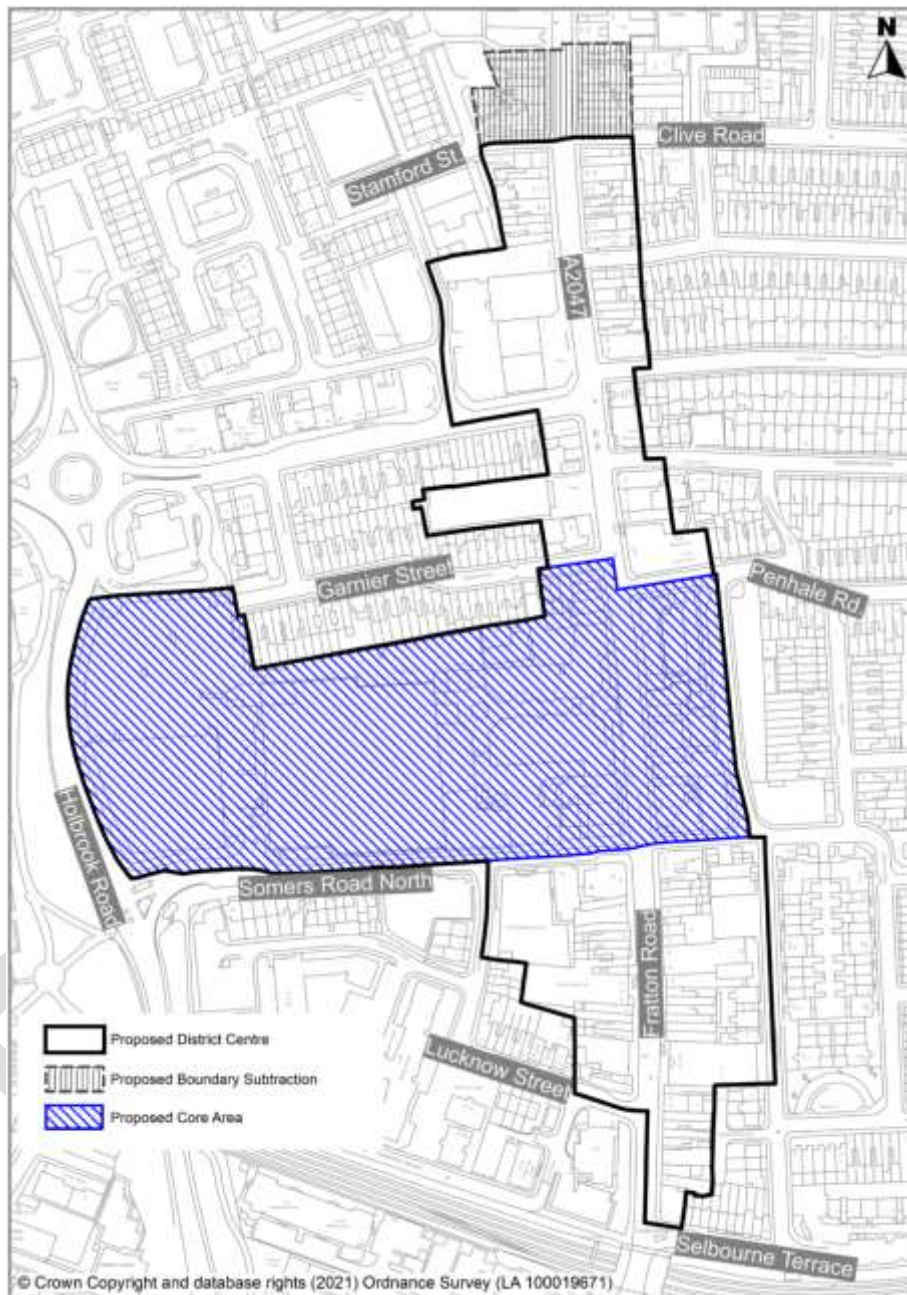
- 3.6.33 A strategy for the centre should aim to improve environmental quality of the area, create more a community hub offer and feel where possible and support the economic viability of the area. The employment uses in Kingston Crescent offer potential for enhancement of this area with complementary uses.
- 3.6.34 **Draft Vision:** A successful commercial and employment centre and meeting place for the local community, set within an improved environment for all.

Proposed Centre Boundary and Frontages

- 3.6.35 Figure 13 shows the revised boundary of the North End District Centre and the core area.
- 3.6.36 It is proposed to reduce the significant extent of protected commercial frontage along the Fratton Road/ Kingston Road/ London Road route through Portsea island (encompassing the Fratton District Centre, Kingston Road Local Centres, North End District Centre and London Road Local Centres) to include a reduction in the overall extent of the existing North End District Centre area. The aim is to create more defined centre area and enable a wider range of uses as appropriate.
- 3.6.37 Within this smaller overall area, a condensed core area for North End is proposed, focused round the geographical centre of the existing centre, from the junction of Chichester Road to Laburnum Grove, which is generally the main retail focused area. It is proposed to retain the Kingston Crescent area within the North End centre boundary as the existing mix of uses, and any potential future re-development, may help to support the centre's core commercial area.

Fratton District Centre

Figure 14-Fratton District Centre Map



3.6.38 Fratton District Centre is a linear commercial centre of mostly independent businesses, located around a mile from Portsmouth City Centre. The centre is focused around the ASDA Supermarket and Bridge Shopping Centre on Fratton Road, spreading southward to adjoin Selbourne Terrace/ Goldsmith Avenue (A2030) and the railway line, with Fratton Railway Station to the south-east. The centre also extends northward along London Road, close to the grounds of St Mary's Church. While the centre primarily serves local needs, there is a number of international food stores towards the south of the centre with potential for a wider

customer base across the city. The centre falls within an Air Quality Management Zone (AQMZ 6).

- 3.6.39 Analysis of the centre found that although there has been a reasonable level of average retail occupation, there is limited offer in terms of other commercial, community, leisure uses across the centre, particularly in comparison with other centres, with notably few cafes or restaurants. The amount of vacant units in the centre is high compared with the other Portsmouth centres, a rate which has generally continued to increase annually.
- 3.6.40 There is generally little vitality in parts of the centre during the daytime due to the limited range of uses and the number of vacant units, shifting the balance of activity to more evening focused uses such as hot food takeaways and pubs. Key local facilities, including the Fratton Community Centre and Cargenie Library, are not centrally located and fall just outside of the existing centre boundary. The quality of the urban realm and the environment (including air quality) in the centre is recognised as being in need of improvement and there is little integration or connections between buildings, the street scene and the surrounding area (particularly in relation to Fratton Railway Station, the Bridge Shopping Centre and the City Centre).
- 3.6.41 Fratton has been shortlisted for potential funding as part of the Government's *Future High Streets Fund*, set up to help transform the UK's high streets. The Council could be given up to £150,000 to help create detailed project proposals which can be used to apply for capital funding. The Council will work together with local people and businesses, property owners, community groups and transport companies to develop plans for the area as part of the *Future High Streets* project. The Council's *Housing and Economic Land Availability Assessment* (HELAA) has also identified a number of locations within, or in close proximity to, the centre that could present opportunities for major new development in the area within the plan period.

Proposed Centre Strategy and Vision

- 3.6.42 A strategy for the future Fratton District Centre should aim to bring back vitality to the area, encourage community uses/ meeting places and lay the foundations for economic recovery. A more flexible approach to appropriate uses in the centre would potentially support a more diverse range of activity and encourage the use of vacant units and/ or the redevelopment underutilised blocks. Uses with a range of opening times should also be encouraged to help bring life to the centre during the daytime. Improvements in the environmental quality of the centre, particularly in terms of air quality, sustainable transport and access to green space, would benefit the health and well-being of the local community and create a more appealing environment for new residents and businesses. These key principles

could be reflected in the proposals to be developed as a part of the *Future High Streets Fund*.

- 3.6.43 Development proposals will need to take into account the area's recognised air quality issues, in-line with *Policy D4: Pollution, Health and Amenity*.
- 3.6.44 Any significant regeneration proposals for the centre must include involvement from the local community, established community interest groups (such as Fratton Big Local) and other local stakeholders in order to build upon the local needs and aspirations for the area. Proposals could seek to develop upon the existing key features of the area, for instance:
- The range of international food stores, as a cultural element for the centre.
 - Fratton Train Station, fully utilising sustainable transportation for additional new homes and businesses and opportunities for improved integration with the centre.
 - Regeneration opportunities for identified vacant or underutilised development plots, such as The Bridge Centre.
- 3.6.45 **Draft Vision:** Uplift of the area into a vibrant, accessible centre with a diverse mix of uses supported by new residential development.

Proposed Centre Boundary and Frontages

- 3.6.46 It is proposed to retract the core retail area at the southern end of the centre due the comparatively lower proportion of retail uses in this part of the centre and to encourage a wider range of town centre uses and potentially new housing in proximity to the train station as appropriate. The overall centre area will also be reduced by contracting the northern extent of the centre to the Clive Road/ Stamford Street crossroads. Figure 14 shows the proposed boundary of Fratton District Centre and the core shopping area.

Albert Road and Elm Grove District Centre

Figure 15-Albert Road & Elm Grove District Centre Map



3.6.47 This long, linear (west-east) centre is divided by Victoria Road South into the two localities; together Albert Road and Elm Grove offer an eclectic mix of independent shops, restaurants and cafes as well as local goods and services. Albert Road is active throughout the day with a number of shops, cafes, bars and restaurants as well as community uses including two primary schools. The centre has continued to maintain a unique character from the high concentration of independent businesses.

3.6.48 Centre analysis concluded that Albert Road and Elm Grove remain viable centres, indicated by a comparably low proportion of vacancies and varied mix of town centre uses. The nature and distribution of the types of uses throughout the majority of the centre are fairly similar (largely shops, cafes/ restaurants, pubs and 'other' uses such as tattoo parlours), though there is a slightly higher concentration of more 'evening' focused uses around The Kings Theatre at the western end of Albert Road.

3.6.49 The range of ownerships and existing high density of development in the area present few opportunities for major new housing schemes or significant regeneration, although the area's accessibility to public transport would help

support any new housing. The narrow footpaths, with high usage as one of key routes through central Southsea, present potential challenges to increasing street greenery or GI features. The length of the centre is perhaps a disadvantage, with historically a greater proportion of vacant units towards the far eastern end of the centre.

Proposed Centre Strategy and Vision

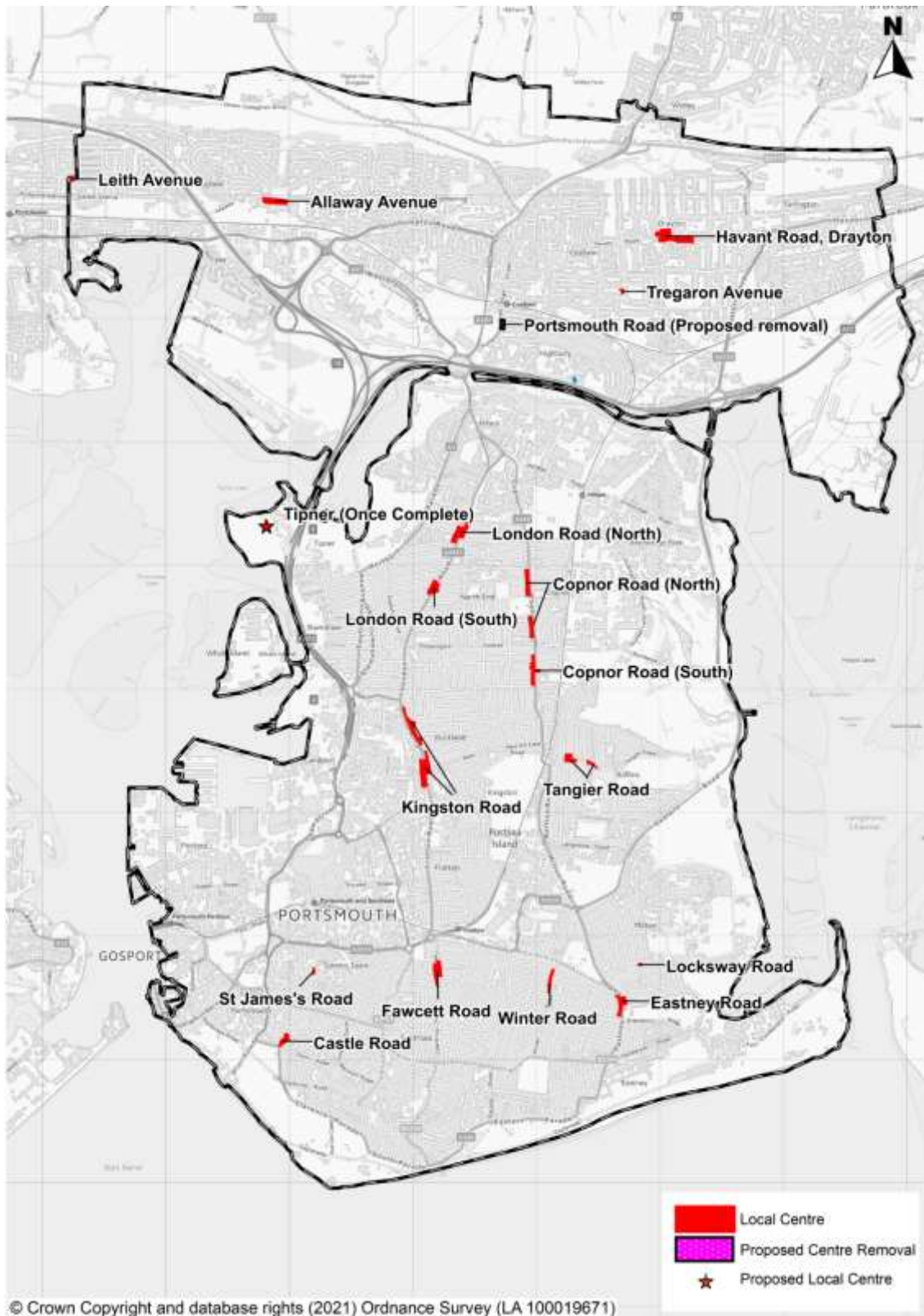
- 3.6.50 The identity of Albert Road and Elm Grove as a centre for independent traders and key local services should be maintained and enhanced, whilst protecting the amenity of the surrounding residential area. Uses and businesses in the centre may need to continue to evolve with changing consumer trends, in-lieu of any identified opportunities for major redevelopment. The flexibility for new town centres uses, considered on a case-by-case basis should enable the centre to be responsive to changing trends over the plan period.
- 3.6.51 **Draft Vision:** To maintain and enhance Elm Grove and Albert Road's unique character and vibrant mix of day time and evening uses.

Proposed Centre Boundary and Frontages

- 3.6.52 While the overall centre boundary still suitably reflects the centre's commercial extent, the significant length and broadly similar nature and distribution of uses in the centre may justify a division into geographical sub 'localities', rather than 'core' and non-core areas. However, to maintain some distinction between the main Albert Road and Elm Grove frontages, residential and other non-commercial uses will be encouraged to locate in the western part of the Elm Grove centre, which is already occupied by a higher proportion of residential uses. Defining sub-areas would allow for the consideration of the balance, mix and impact of uses by locality, as well as for the centre as a whole. Figure 15 shows the proposed boundaries for the Albert Road and Elm Grove District Centre and sub areas.

Local Centres

Figure 16-Map of Local Centres



3.6.53 Local centres serve their immediate neighbourhood by providing daily 'top-up' essentials and local services (such as food stores, hairdressers and takeaways).

They help to reduce the need to travel to larger centres or make additional car journeys.

3.6.54 Portsmouth Local Centres vary in size; from small parades of shops (e.g. Allaway Avenue, Paulsgrove and Locksway Road, Milton) to more significant 'local hub' centres that support a number of small commercial businesses and other services (e.g. Havant Road in Drayton and Fawcett Road in Southsea).

3.6.55 Past analysis of the local centres concluded that most of the centres have a high proportion of retail uses, some supporting uses (including residential) and low vacancy rates, indicating that they are continuing to provide an sufficient range of services and are generally well utilised by the local community.

Proposed Portsmouth Local Centre Strategy

3.6.56 Portsmouth Local Centres should maintain their role of providing day-to-day services. However, some changes could be made to the local centre network in order to rationalise their distribution across Portsmouth and to ensure that the Local Plan accurately reflects their existing function. The proposed changes are as follows:

- Removal the Port Solent Boardwalk Local Centre due its focus on leisure/ dining as opposed to local services.
- Removal of the Portsmouth Road Local Centre from the network given its very close proximity to the Cosham District Centre.
- Maintaining St James' Road as the existing Somerstown Local Centre, after the Grosvenor Street re-development did not occur as anticipated in the 2011 Area Action Plan.
- Reducing the extent of the Kingston Road Centres given the significant local and district centre service provision in the area.

3.6.57 To help direct development to the most appropriate locations within the centre hierarchy, proposals above 500sq m are encouraged to locate to other 'upper' centres in the Portsmouth Centre Hierarchy; 500sq m is approximately the size of the larger 'anchor' stores found in Local Centres. However, if a proposal cannot be accommodated in, or on the edge of, any of the town centres further up the hierarchy, a local centre would be the next preferred location, see *Policy E4: Supporting Portsmouth's Town Centres*.

3.6.58 Eastney Road and Locksway Road Local Centres fall within the emerging Milton Neighbourhood Plan area, which provisions of which, once adopted, will be a material consideration for any proposals within these centres.

PROPOSED STRATEGIC POLICY E5: TOWN CENTRE STRATEGIES

- 3.6.59 The Local Plan proposes to continue to focus on Portsmouth's town centres as key focal points for renewal, new development, activity and experiences. The Council's Local Transport Plan's aims to reduce or remove traffic the city centre, district and local centres and focus on walking, cycling and public transport; such requirements for new development are captured in *Policy C3: Sustainable Transport*.
- 3.6.60 The draft framework for Portsmouth Town Centre Strategies aims to provide the foundations to create attractive and diverse places where people want to live, work and gather, and which are reflective of their distinctive characters.
- 3.6.61 To support the life of centres, and to take account of the fast changing nature of retail and leisure trends, there is a need to be flexible to allow the consideration of a range of town centre uses (including housing), provided there is a positive contribution to the centre and the local community. However, to maintain vibrant centres, there is a continued preference for active uses at the ground floor level, particularly within the defined core centre areas. Housing in town centre locations is encouraged at the first floor level and above to ensure a range of activity throughout the day and night and to contribute to the feeling of a safer environment.

Policy E5: Town Centre Strategies

Proposals will be supported in principle where they are in conformity with the relevant centre strategies.

Core centre frontages:

In the identified core areas for **Commercial Road** and **Southsea Town Centre**, commercial, business and service uses (Class E Uses) will be encouraged.

In **District Centre** core areas, Local Community and Learning uses (Class F) and commercial, business and service uses (Class E Uses) and will be encouraged.

A range of other main town centres uses⁵⁹ and other uses (including drinking establishments and hot food takeaways where appropriate) may also be considered in core frontages where they would satisfactorily meet the relevant centre vision and the following criteria:

- A. There is a positive contribution to the vitality of the centre, and the proposal would result in:
 - i. Equal or greater footfall; and/ or

⁵⁹ As defined in the glossary of the National Planning Policy Framework.

- ii. An extended duration of active uses in the centre;
- B. There are no unacceptable adverse impacts, either individually or cumulatively, on the function and the viability and vitality of the core frontage; and
- C. The design and layout is appropriate for a town centre setting at the ground floor level, including an active display with immediate access for the public from the street.

In all centres, other 'main town centre uses', residential uses (where appropriate) and other uses will be granted planning permission where proposals meet criteria A-C above and the relevant centre strategy.

For all proposals, planning permission will only be granted if there are no unacceptable adverse impacts on local residents and existing businesses in the centre, taking into account the cumulative impact of existing and permitted development in the centre, particularly on air quality. Any potential significant adverse effects from existing businesses and community facilities on new development must be adequately mitigated by the applicant (or 'agent of change').

Planning conditions may be used to restrict subsequent change of use and to ensure activities and opening hours are appropriate and in accordance with the centre vision and objectives.

Portsmouth City Centre - Commercial Road & Gunwharf Quays

The Commercial Road area should be vibrant and successful core of the city centre with uses that provide a safe and welcoming environment for local residents, students, employees and visitors.

Incorporating a broader range of uses, including more dining options, leisure and entertainment facilities, employment space, community facilities and new homes (on the upper floors), would support the high street and promote continued daytime and evening activity.

Proposals should contribute to providing a high quality public realm so far as practicable, and consider the interface with street network, public areas and 'gateways' into the centre, as well as opportunities for greening the centre.

A mix of retail, dining, leisure and entertainment uses will be supported in principle for Gunwharf Quays, where they are in-keeping with the high quality setting. Other uses would also be supported on the upper floors (e.g. employment, residential or hotel uses) where this does not conflict with the site's outlet shopping function and entertainment offer.

Southsea Town Centre

Proposals will be expected to contribute to maintaining and enhancing the appeal of the centre as a key retail, dining, leisure and event destination, to include:

- Taking account of the identity and character of the centre localities: Palmerstone Road north/ south; Marmion Road: Osbourne Road.

- Respecting the character of the Conservation Area setting.
- Enhanced public realm and/ or green features to create more visual interest in the high street environment.

District Centres

District centres should provide welcoming environments and be adaptable to changing local needs. Development proposals in all centres should maximise sustainable transport opportunities, enhance the public realm and deliver 'greening' of the centre where possible (see *Policy G2: Green Infrastructure*).

Cosham District Centre

Proposals will need to demonstrate consideration of the following as appropriate:

- Enhancement of the High Street core area as a high quality retail, market and event space.
- Improving connectivity and permeability both within the centre and to local key facilities/ destinations.
- Improving the quality of the public realm; including the design of new buildings, commercial frontage and opportunities to 'green' the high street.
- Opportunities for maximising sustainable transport options linked to the train station (e.g. a mobility hub)

Increasing the number of homes and employment opportunities within the centre is encouraged (see *Policy S4: Cosham*).

North End District Centre

Proposals will need to demonstrate consideration of the following aspirations as appropriate:

- Improving the pedestrian and visitor experience, including safety concerns,
- Public realm improvements including 'greening' of the centre.
- Improving air quality.
- Enhancing Kingston Crescent as mixed-use location.

Fratton District Centre

Development proposals must demonstrate that account has been taken of the following as appropriate:

- Increasing daytime activity in the centre.
- Consideration the interface and links between the centre, railway station and surroundings areas including Portsmouth City Centre.
- Taking account of the Air Quality Management Zone (AQMZ).
- Opportunities for increasing residential development and housing density in proximity to Fratton Railway Station.

Albert Road and Elm Grove District Centre

Development proposals must demonstrate that account has been taken of the following:

- Protection and/ or enhancement of the centre's unique character
- Measures to protect local amenity.

- Potential impacts on each locality as well as the wider centre.

Local Centres

To maintain and enhance the role of local centres to provide for day-to-day services of residents, shopping (Class Ea) uses up to 500sq metres are encouraged.

Other town centre uses and residential uses may also be acceptable where there are no unacceptable adverse impacts, either individually or cumulatively, on the role and function of the centre.

Policy Monitoring	
Policy Aim(s)	Key Indicator(s)
➤ Supporting centre viability and vitality.	<ul style="list-style-type: none"> - Visitor footfall (where available). - Proportions of vacant frontage - New residential, office or hotel development in or adjacent to the centre.
➤ Maintaining a concentration of preferred uses in core centre areas.	<ul style="list-style-type: none"> - Annual survey of frontage uses
➤ Extending the duration of active uses.	<ul style="list-style-type: none"> - New development with permitted opening hours beyond 5.30pm
➤ Ensuring Local Centres provide key services for their local neighbourhoods	<ul style="list-style-type: none"> - Proportion of retail and other town centre uses (biannual survey) - Applications granted for non-residential uses above 500 sq m.

Further Information

- PCC (2021) *Portsmouth Retail and Town Centres background paper*

Question 16 - Town Centre Strategies

a. Do you agree with the proposed approach to Policy E5?

b. If not what changes would you suggest and why? E.g. should provision for other types of uses/ facilities or other design features/ public realm aspects be included?

4 - Community and Infrastructure

4.1 Community and Leisure facilities (Policy C1)

- 4.1.1 Once lost, valued local facilities such as small shops, community halls and sports facilities, can be hard to replace. In Portsmouth there is an existing network of both Council and privately owned indoor community and leisure facilities⁶⁰ across the city. It is important that these spaces are protected and retained in accessible locations.
- 4.1.2 Council owned or managed indoor facilities include community centres⁶¹, libraries, youth clubs, sports centres and museums⁶². The Local Plan also seeks to protect the provision of city's open space and outdoor recreation facilities (*Policy G3*) and cultural facilities such as theatres and music venues (*Policy E3: Culture and Tourism*).

Why is this policy needed?

- 4.1.3 National planning policy recognises the essential contribution that community facilities make to the health and wellbeing of residents. Planning policies and decisions should plan positively for the provision and use of these spaces to enhance the sustainability of communities and guard against their unnecessary loss, particularly where this would reduce the community's ability to meet its day-to-day needs.
- 4.1.4 Indoor sports facilities help to support health and well-being in the city. Portsmouth has above averages incidences of a number of health issues, particularly within the more deprived areas of the city, which can create barriers to participation in sporting activities. Accessible high quality community and sports facility provision is necessary to avoid worsening existing inequalities and to help move towards greater health and well-being for all.

Indoor Sports Facilities in Portsmouth

- 4.1.5 An assessment of indoor sports provision in Portsmouth was undertaken as part of the Council's *Sports Facilities Strategy* (2017); it found that areas in that 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. The Assessment also identified that some existing facilities (inc. The Pyramids Centre) were in an ageing condition and in need of extensive refurbishment or replacement in the short to medium term.

⁶⁰ Including Class F: Local Community and Learning uses and other (Sui Generis) uses as applicable. Details of the Council's Community centres can be found online at: <https://www.portsmouth.gov.uk/services/community/community-centres/>

⁶² Council leisure facilities are listed online at: <https://www.portsmouth.gov.uk/services/leisure/>

- 4.1.6 To help support health and well-being in the city, the Council regularly reviews how best to invest in sport and leisure facilities. A public consultation in late 2020 asked for views on options for replacement provision for Eastney Swimming Pool and Wimbledon Park Sports Centre, which are no longer viable to continue to maintain. The preferred option was for a brand new facility in Bransbury Park, in the south-east of city, on the site of an existing facility. These proposals are still at an early stage; next steps would include further discussions with the users of all sites to help decide the right mix of facilities for any replacement centre.
- 4.1.7 The Council will be producing an update to the 2017 Sports Facilities Strategy as part of working towards a making a bid to *Sport England's* Strategic Facilities Fund.

Assets of Community Value

- 4.1.8 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.
- 4.1.9 Under the legislation, communities have the opportunity to 'stop the clock' on the sale of valued community assets (such as a local pub or shop) for up to six months. 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 online⁶³.

DRAFT DEVELOPMENT MANAGEMENT POLICY C1: COMMUNITY FACILITIES

- 4.1.10 Policy C1 seeks to protect existing community facilities and ensure any replacement provision is sustainably located.
- 4.1.11 Where it can be evidenced that facilities are no longer fit for purpose, the scope of any replacement provision must be of at least equivalent or improved offer (and quality) in-line with evidenced demand, in an accessible location. Proposals for any new community facilities should be accessible to their intended users, without increasing the need for additional vehicle trips.

⁶³ Community Right to Bid guidance and Register of Assets of Community Value:
<https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/community-right-to-bid/>

- 4.1.12 The Council may seek a Community Use Agreement to increase accessible provision where appropriate, to be secured by planning condition.

Policy C1: Community and Leisure Facilities

Planning permissions for the change of use or loss of premises or land in extant use as a community facility, will be granted planning permission where it can be demonstrated that:

1. There is no longer a need for the facility or there is overriding demand for another community use on the site; or
2. Replacement facilities can be provided on-site, or within an accessible location for its users; or
3. The community use can be delivered from other facilities without leading to, or increasing, any shortfall in provision.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Protect the necessary provision of community facilities in the city.	• Planning permissions granted contrary to this policy.

Further Information:

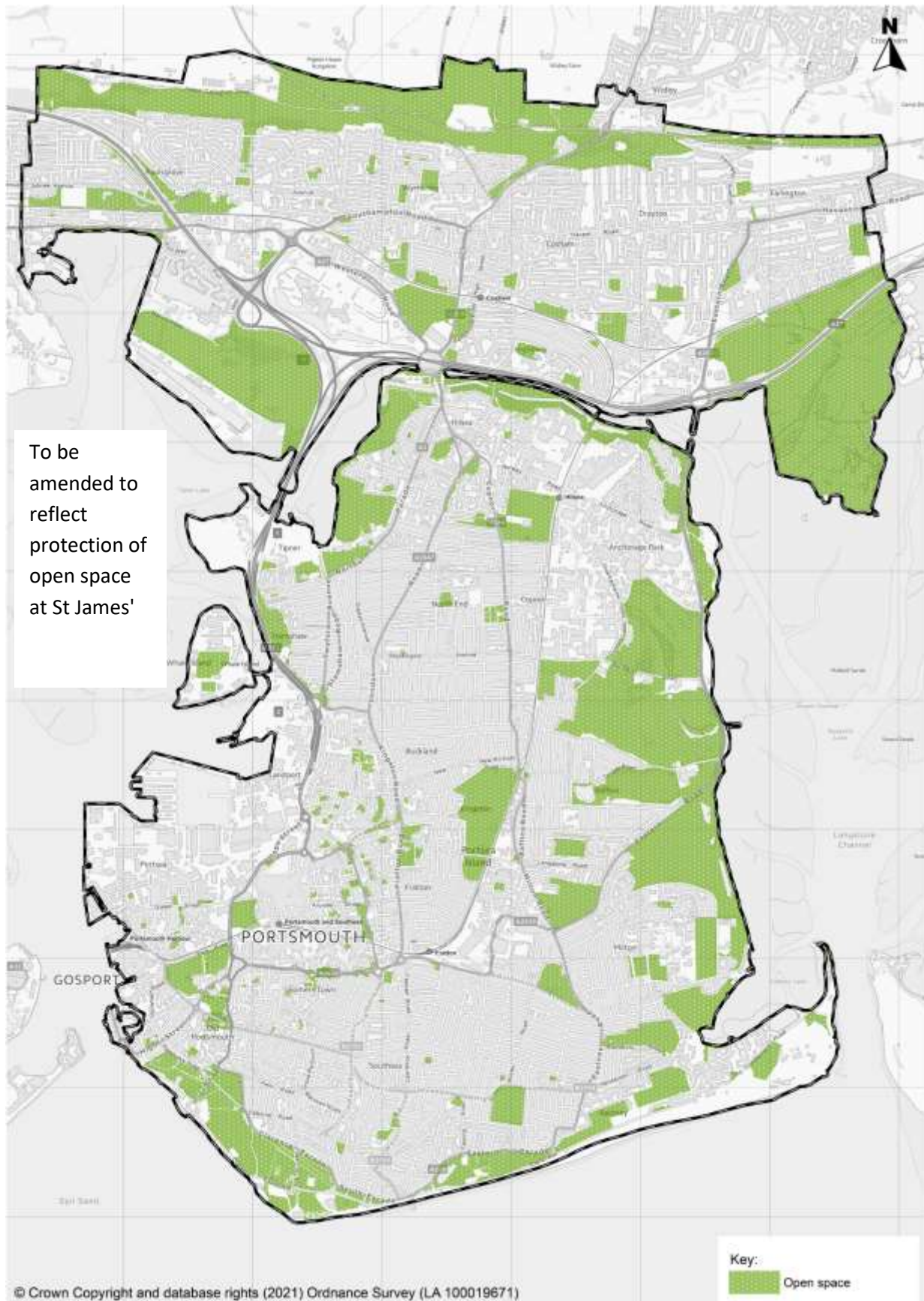
- PCC *Sports Facilities Strategy 2017-2027* (2017)
- Community Right to Bid guidance and Register of Assets of Community Value: <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/community-right-to-bid/>
- Portsmouth City Council leisure services: <https://www.portsmouth.gov.uk/services/leisure/>

Question 17 - Community and Leisure Facilities

- a. Do you agree with the proposed approach to Policy C1?
- b. If not what changes would you suggest and why?

4.2 Open Space and Outdoor Recreation (Policy C2)

Figure 17 - Areas of Open Space



- 4.2.1 Open space is an important part of city's environment. These spaces take many forms, including predominately 'green' spaces, such as parks and gardens, cemeteries, allotments and playing pitches as well as more urban civic spaces such as the Guildhall Square. Portsmouth also benefits from larger areas of natural and semi-natural green space, particularly adjacent to Langstone Harbour and along Portsdown Hill to the north. The City's outdoor recreation facilities include playing pitches, golf courses, adventure parks, splash pools and skateparks.
- 4.2.2 Portsmouth's open spaces offer extensive public benefits to the wellbeing of people who live and work in the city. They help to support physical and mental health through providing space for physical activity (including organised team sports and more informal play), social gatherings as well as an escape from the urban environment. These spaces also host various events and activities throughout the year, supporting the local economy. Green open spaces in particular form part of the city's wider Green Infrastructure network, including significant ecological sites that support biodiversity, they also form part of the setting of many protected heritage assets across the city, as well as helping to contribute to climate resilience during heatwaves or heavy rainfall events.
- 4.2.3 Portsmouth's open spaces can be categorised into different types of space, as shown in **Error! Reference source not found.** 18 below. The examples listed are not comprehensive however, and many spaces would fall into multiple categories, reflecting their multifunctionality. Local Green Space designations⁶⁴ and registered Village Greens⁶⁵ would also form part of the open space network and are another means to provide special protection for green areas of particular importance to local communities.

Figure 18 -Types of Open Space Provision

- **Parks and Gardens:** Victoria Park, Milton Park, Alexandra Park and The Rock Gardens at Southsea seafront.
- **Natural and semi-natural greenspaces:** Hilsea Lines, Great Salterns and Farlington Marshes.
- **Outdoor Sports Facilities:** King George V Playing Fields, Farlington Sports Ground and Alexandra Park.
- **Amenity greenspace:** Southsea Common, Tangier Field and King George V playing fields.
- **Provision for children and teenagers:** Bransbury Park, Canoe Lake and supervised adventure playgrounds.
- **Allotments:** Moneyfields allotments, Milton Piece and Longmeadow.
- **Cemeteries and churchyards:** Kingston cemetery, Highland Road cemetery and Milton cemetery.

⁶⁴ Where in-line with the requirements of para. 99 & 100 of the NPPF (2019, MHCLG)

⁶⁵ Under the *Commons Act 2006* (as amended). More information online at:

<https://www.portsmouth.gov.uk/services/leisure/parks/town-and-village-greens/>

Why is this policy needed?

- 4.2.4 The need for open space provision in Portsmouth must be considered alongside the city's other growth needs, such as housing and employment space. The proposed approach in the Local Plan is guided by the presumption in national planning policy to protect against the loss of such spaces.
- 4.2.5 Ensuring a network of high quality open spaces and opportunities for sports and physical activity is particularly important for addressing health concerns and inequalities in Portsmouth as well as meeting the objectives of Council's *Health and Wellbeing Strategy*, particularly in relation to rates of obesity in both children and adults in Portsmouth, which is above the national average. The protection of open space also supports the wider objectives of the Local Plan, including those relating to preventing biodiversity decline, addressing poor air quality, reducing carbon emissions and adapting to future climate change.

Open Space Requirements

- 4.2.6 An audit of open spaces and playing pitches in the city was undertaken in order to assess current provision and likely future needs, based on population growth projections. It identified an increasing need for the open space provision in the city, with present and future deficits in terms of quantity in all the types of open space (the typologies shown in Figure 18). The Assessment concluded that where possible opportunities should be taken to create new open space as part of development proposals, though it was acknowledged that this is likely to be challenging due to the city's space constraints. Where new open space is not possible, an alternative is to provide quality improvements to existing spaces, which will enable them to accommodate greater demands. The Assessment noted opportunities for improving seating and signage in the city's open spaces, as well as informal biodiversity improvements (such as wildflower meadows or additional tree planting). In addition, there is potential for a greater range of equipped play facilities, particularly at larger play sites, that could cater to older children as well as disabled and less able-bodied children.
- 4.2.7 The *Playing Pitches Strategy* noted similar findings in respect of formal playing pitches with a recognised shortfall in high quality football pitches (particularly 3G) and rugby pitches. Protection of pitches will be necessary to ensure that current and future sports' demands can be met.
- 4.2.8 The Government's guidance notes on the proposed *National Model Design Code* (published Jan 2021) indicate that open space and recreation guidance on Accessibility to Natural Greenspace (ANGSt) will shortly be updated. This will include the revision of standards used to set local space requirements, which currently tend to be either population based (as used in assessments of Portsmouth's need) or based on distance to open space. It is acknowledged that the population based standards may be difficult to achieve in areas of high

density, such as Portsmouth, and that contributions may need to be made towards any shortfall. The proposed guidance indicates that the new standards may focus on accessibility to open space. The forthcoming *National Framework of Green Infrastructure Standards* by Natural England is also expected to include guidance on ensuring access to a natural green space, with particular size/ distance criteria. The Local Plan evidence base and approach to open space and recreation may therefore require revision in-line with new guidance in due course.

Protecting existing open space in the city

- 4.2.9 Given the city's need for additional open space, Portsmouth's existing open spaces will need to be protected from development where possible. Figure 17 shows the proposed network of designated open spaces in Portsmouth, which includes all types of provision from urban public space and outdoor sports facilities to and green space.
- 4.2.10 Development proposals that would result in the loss of these open spaces would need to demonstrate that there are 'wider public benefits' to be gained from the development that would outweigh the loss of these spaces. This wider public benefit should be in the interests of the area in the first instance, then the wider city as a whole. Replacement provision (to be at least equivalent in terms of quantity and quality) would also need to address all the 'services' that the area of open space provided. For proposals affecting sports provision, it is recommended that applicants undertake pre-application discussions with Sport England.
- 4.2.11 Green or natural surfaced open spaces are a particularly valued component of the network; they are capable of offering a wider range of benefits than more urbanised open spaces, such as cooling of the 'urban heat island' effect and flood resilience by retaining water. The city's green open spaces also form part of the proposed Green Infrastructure Network (See Section 5.2); any impact upon these areas would also need to meet the requirements of *Policy G2: Green Infrastructure*.

Creating new open space and enhancing existing spaces in the city

- 4.2.12 While all proposals are encouraged to provide or enhance access to open space, for larger residential proposals we are considering a requirement for new publically accessible open space to be delivered as part of the development to a standard of 1.65 ha per 1000 people⁶⁶ for proposals of 100 or more new homes⁶⁷, where possible. Where it can be demonstrated that this would be undeliverable on-site, other measures would need to be explored and agreed with the Council,

⁶⁶ 1.65 ha per 1000 people has been determined based upon nationally recommended standards (Fields in Trust standards) of provision for amenity green space, equipped greenspace and parks and gardens.
<http://www.fieldsintrust.org/guidance>

⁶⁷ At the equivalent ratio for other residential accommodation such as student and older persons accommodation as stated in national planning policy guidance.

such as local off-site provision or a contribution to the enhancement of nearby open space.

- 4.2.13 The type of open space provided with new residential development should consider the intended occupants of the development, evidence on health and well-being, as well as any particular deficiencies in local provision. As rates of obesity in both children and adults are above the national average in Portsmouth, access to high quality equipped play spaces for children, both formal and informal play spaces that are able to accommodate sport and other physical activity for all ages and abilities (inc. the disabled and less abled), may need to be considered. Any new play or recreational provision should be informed by national guidance and the most recent available evidence on local need, as well as early discussions with the Council.
- 4.2.14 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.
- 4.2.15 Proposed enhancements of existing open space and recreation area should consider opportunities to increase the multi-functionality of these spaces to maximise their use, and/ or accommodate greater usage pressures, as well as delivery wider benefits (such as enhancing biodiversity value or installing new and/ or improved recreational facilities).
- 4.2.16 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 (see Policies S1-S9).

DRAFT STRATEGIC POLICY C2 OPEN SPACE AND OUTDOOR RECREATION

- 4.2.17 There is a need to enhance Portsmouth's existing open spaces to help meet the need for open space and recreational provision, and to help contribute to wider aims of the Local Plan with respect to the Council's greening, air quality and climate change objectives.
- 4.2.18 Policy C2 protects areas of open space and recreation (as shown in Figure 17) and requires larger housing schemes to contribute to open space provision in the city where possible.

Policy C2: Open Spaces and Outdoor Recreation

Protecting and enhancing existing open space

All 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.

Any proposals that would result in the net loss of open space, including outdoor sporting facilities and recreational buildings and playing fields (within the areas shown in Figure 17), will be refused, unless the following can be satisfactorily demonstrated:

- Existing provision is surplus to requirements (in terms of quantity or accessibility); or
- Loss resulting from the proposed development would be replaced by at least equivalent or improved provision (in terms of quantity and quality) in an appropriate location; or
- 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.

Providing new open space

Development proposals for 100 or more new homes⁶⁸ will be expected to provide an area of open space to the ratio of 1.65 ha per 1,000 people. Where it can be demonstrated that this is not feasible, an appropriate off-site enhancement or developer contribution, proportionate to the size of the development, may be agreed and secured by condition.

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.

Policy Monitoring	
Policy Aim	Key Indicator(s)
➤ Protection and enhancement of existing open space	- Losses/ gains of open space - Developer contributions allocated to open space/ recreational provision enhancements
➤ Creation of new open space and recreational provision	- Number of applicable schemes that include provision for new open space and the quantity

Further Information:

- PCC *Green infrastructure background paper (2021)*
- Portsmouth City Council *Open Space Needs and Opportunities Assessment 2018 and 2020 Addendum.*
- PCC *Playing Pitches Strategy 2018 - 2034*

⁶⁸ At the equivalent ratio for other residential accommodation such as student and older persons accommodation as stated in national planning policy guidance.

- PCC *Parks and Open Spaces Strategy 2012-2022*
- PCC *Health and Wellbeing background paper (2021)*
- PCC *Health and Wellbeing Strategy 2018-2021*

Question 18: Open Space and Outdoor Recreation

a. Do you agree with the proposed approach to Policy C2? 16b.If not what changes would you suggest and why?

c. Are there any areas of open space that should be added or removed from the policy?

d. Should major new development deliver new open space? 16e.You do agree with proposed ratio for delivery?

DRAFT

4.3 Sustainable Transport (Policy C3)

4.3.1 Action is needed now to shape a future that accommodates changing travel patterns and the city's growth, in a more sustainable way. Through the emerging Local Transport Plan 4 (2020-2036), we are striving to create an environment that allows everyone to travel as sustainably as possible when making every day journeys around Portsmouth.

4.3.2 The provision of a safe, convenient 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 centered travel network across the city, linking into and connecting local areas.

Why is this policy needed?

4.3.3 For a range of reasons, people living in many UK towns and cities have become more dependent on the car, particularly for short, local trips that could be made by other modes. In Portsmouth this has resulted in unsustainable levels of carbon emissions from transport, unhealthy polluted air, regular traffic congestion problems and reduced levels of physical activity.

4.3.4 We recognise that a new approach is needed to how transport is managed in the city, based on an understanding of the city and how it works. Action is needed now to shape a future that accommodates changing travel patterns and the city's growth, in a more sustainable way, rather than looking to increase capacity for vehicles. Through the Local Plan and the Portsmouth Transport Strategy (Local Transport Plan 4), we are striving to create an environment that makes it easier for people to choose sustainable travel when making every day journeys around Portsmouth.

4.3.5 Focusing on making walking, cycling and public transport the more efficient and appealing options will help create a more pleasant and resilient city, with cleaner air and a healthier population. Reducing congestion, making business and the ports more efficient, improving air quality and helping to ensure that those who must travel by private vehicle, such as people with significant mobility impairments, can do so quickly and efficiently is central to ensuring we have an economy that can provide good quality jobs and prosperity for all of those who live and work in the city.

4.3.6 Portsmouth, like other towns and cities across the UK, faces a number of urgent challenges to growth and sustainable development. Within these challenges there are also opportunities improve the transport network and the wider impacts upon the city.

Challenges and Opportunities

Managing the impact and recovery from COVID-19 outbreak

- 4.3.7 The COVID-19 pandemic necessitated immediate and widespread changes to the way the city operates and to people's lives. A nationwide lockdowns have been imposed to slow the spread of the virus which has dramatically reduced travel demand. We expect that there will continue to be significant disruption to travel throughout 2021, with social distancing restrictions likely to remain in place – reducing the capacity of public transport services and making queuing on footpaths to access shops and services more common.
- 4.3.8 The opportunities that have arisen from the pandemic include a rise of home-working and digital meetings, reducing the need to travel and increase in walking and cycling as part of daily routine where other exercise has not previously been possible. Reduced traffic levels have resulted in less noise, air pollution and safer streets, while many have had the opportunity to explore their local area increasing their appreciation of the local community they live in. Since the government introduced lockdown measures in March 2020, use of motorised traffic in the city has decreased to as low as 34% of pre-lockdown levels and cycling numbers have increased to as much as 156% compared to 2019. We can support people to continue using active travel for shorter journeys by prioritising walking and cycling.

Climate Emergency

- 4.3.9 A Climate Emergency was declared by Portsmouth City Council in March 2019, pledging to achieve net zero carbon emissions in Portsmouth by 2030. To work towards this target, a multi-organisation Climate Board has been established. This announcement complements the current policy direction at national government level, including, for example the proposals to ban the sale of petrol and diesel cars in 2035, or possibly as early as 2032.
- 4.3.10 The opportunity here is to realise the benefits of a carbon neutral city. Some of these have been seen during the COVID-19 crisis and include less traffic, more local walking and cycling, cleaner air, safer streets and less noise pollution. If we can provide the conditions that enable people to choose to travel less by car while still accessing what they need day to day we can secure many of these benefits for the long term.

Poor air quality in areas of the city

- 4.3.11 Poor air quality is the largest environmental risk to public health in the UK. Studies have shown that long-term exposure to air pollution reduces life expectancy and worsens conditions such as respiratory and cardiovascular diseases. The impacts of air pollution are not felt equally, with those living in the most deprived communities at greatest risk of exposure to air pollution (due to proximity to

congested roads and other pollution sources) and associated poor health outcomes.

- 4.3.12 Portsmouth City Council has an on-going duty to review and assess air quality, and has declared five air quality management areas (AQMAs) due to continued high concentrations of nitrogen dioxide, a pollutant particularly associated with road traffic emissions. The city council has also been legally directed to implement a Class B charging Clean Air Zone focused on areas with high concentration of air pollution in the city centre. This zone will be operational from late 2021 and will result in the most polluting vehicles being charged for driving in the zone.

Changing attitudes to travel and personal mobility

- 4.3.13 Over the last twenty years there has been a significant change in how often, when, where, why and how we travel. As a nation, we travel less per head of population than we did over the past two decades, with 11% fewer trips made in 2018 than in 1996⁶⁹. Such changes in behaviour are a result of a combination of factors including changing demographics, changes to how and where we shop, advances in technology and changing land-use patterns; including an increase in out of city centre shopping centres. Such factors are influencing our attitudes to travel and personal mobility. Our transport infrastructure must be planned in a way that keeps up with these changing trends and patterns of travel demand.
- 4.3.14 These changes in how we travel are likely to prevail, as younger people delay learning to drive and buying a car; instead spending more money on technology and on the 'sharing economy'⁷⁰. There is a growing expectation that transport services will be more flexible, with information on travel options, journey times, costs, fare payment and disruption alerts accessible via smartphones. In addition, with all of us spending more time socialising and shopping on-line, demand for high street floor space will continue to shift. High streets in town centres are expected to fulfil new functions; potentially becoming more leisure oriented, facilitating co/home-working, and meeting the demands of a growing residential population within the city. This presents an opportunity for reduced car use and ownership, as technology enables the delivery of more flexible mobility services that better meet evolving patterns of urban living and associated travel demand. The benefits of reduced car ownership and use are discussed later on.

Changes to future mobility

- 4.3.15 As well as changing attitudes to travel and mobility, innovative new technologies like on-demand buses, autonomous vehicles and shared micro-mobility services (e-bike and e-scooter hire), are expected to become more widely available.

⁶⁹ DfT National Travel Survey data

⁷⁰The Centre for Transport & Society,

UWE Bristol & University of Oxford (Jan 2018) Young People's Travel– What's Changed and Why? Review and Analysis.

Smartphones and 'Mobility as a Service' apps will allow flexible access across these services to enable people to pick and choose the options that meet their needs for every journey. Freight consolidation centres will help to reduce the number of large delivery vehicles requiring access into the city by transferring freight onto small electric bikes and vans.

- 4.3.16 While some of these technologies may disrupt established norms (such as fixed-route public transport services), they present a positive opportunity to improve the attractiveness of sustainable, shared transport to encourage an overall reduction in car use. Future transport projects will test and deliver new forms of personal mobility and sustainable urban logistics services, supporting innovative and efficient movement of people, and goods in urban areas. Our transport network must be flexible enough to adapt to these changes.

Deprivation and inequality

- 4.3.17 Although Portsmouth's economy has grown faster than the UK and Solent average in recent years, Gross Value Added (the value of goods and services produced in an area) in Portsmouth is still 10% below the southeast average due to a slowing of growth since the financial crisis in 2008⁷¹. Portsmouth has high levels of deprivation with the highest levels close to the city centre. These are also areas where car ownership levels are among the lowest in the city, but these residents are also the most severely impacted by environmental risks from road traffic - through poor air quality, road danger, noise and severance of main roads separating communities. A national study also identified Paulsgrove as a 'left behind' community suffering from poor connectivity and long journey times.⁷² The range of employment and other opportunities available to people living in Portsmouth is currently greater if you own a car. Often those on the lowest incomes are forced to own a car because public transport doesn't get them to their work easily or at the times they need. Improving travel options across the city by walking, cycling and public transport is vital to reducing deprivation and making our city a fairer place for everyone. Public transport has also been shown as vital to social inclusion of individuals and maintaining the vitality and vibrancy of low-income neighbourhoods.⁷³

Poor walking and cycling infrastructure

- 4.3.18 The Council will be preparing further plans to improve the local cycling and walking infrastructure. Evidence from the preparation of the *Local Transport Plan 4* found that 75% of the cycle routes surveyed were sub-standard. A key issue is that there are no fully-segregated, continuous cycle routes into the city centre. The introduction of this type of infrastructure, complemented by improved local

⁷¹ Portsmouth and South East Hampshire Transforming Cities Fund Strategic Outline Case 2020

⁷² Local Trust 2019, Left behind? Understanding communities on the edge

⁷³ Joseph Rowntree Foundation 2018. The value of new transport in deprived areas. Who benefits, how and why?

conditions in high streets and residential areas, is crucial to encouraging significant growth in cycling across the city.

- 4.3.19 This provides opportunity to rapidly grow the number and range of people who make every day walking and cycling trips through the provision of better routes. We have a great advantage as Portsmouth benefits from one of the highest population densities in the UK, which results in nearly 90% of commuting trips being shorter than 10km, and over 60% shorter than 5km⁷⁴. These are distances that can be easily covered on a bike by most people in less than 30 minutes.

The dominance of the private cars and traffic congestion (pre-covid)

- 4.3.20 Limited public transport options and a fragmented walking and cycling network, meant the majority of travel in Portsmouth are/ were undertaken by car. Cars made up around 80% of journeys into the city⁷⁵ with around 40% of trips entirely within the city also being by car, despite these trips having an average length of 5km⁷⁶. This led to congestion at peak times with vehicles travelling on average 32% slower in Portsmouth than the national average⁷⁷, further reducing the attractiveness of taking public transport, increasing air pollution and impacting the economy. Analysis of the Real Time Information (RTI) system reveals that bus passengers were waiting on average 20%-30% more than they might expect based upon the scheduled timetable due to the impacts of congestion⁷⁸. The pre pandemic predictions were for a significant growth in demand for traffic entering the city unless action is taken, which would lead to an increase in traffic of 26%⁷⁹ and delay of over 50% by 2036⁸⁰. Given Portsmouth's physical limitations on space, it isn't possible to build new roads to meet this demand. Walking, cycling and public transport must be made the more efficient and appealing mode of transport by reallocating road space to walking and cycling and create more priority for public transport.

Supporting the future growth of the city

- 4.3.21 To enable Portsmouth to meet its housing targets and growth needs for the plan period, the draft Local Plan contain a number of proposed Strategic Site Allocations. One proposed allocation, Tipner West, include a key ambition for car free development. Good transport links are vital to ensure that this area will be connected sustainably to the wider city.
- 4.3.22 The proposed strategic site allocations and their new residents and workers will help support and fund walking, cycling and public transport infrastructure, as well

⁷⁴ Census 2011 Travel to work data

⁷⁵ Google Environmental Insights Explorer

⁷⁶ Google Environmental Insights Explorer

⁷⁷ Portsmouth and South East Hampshire Transforming Cities Fund application form

⁷⁸ Portsmouth and South East Hampshire Transforming Cities Fund Strategic Outline Business Case 2020

⁷⁹ Portsmouth and South East Hampshire Transforming Cities Fund Strategic Outline Business Case 2020

⁸⁰ Solent Transport Public Transport Vision

as more frequent public transport services. This will bring benefits to the whole city.

Enhancing public transport connections

- 4.3.23 Bus travel is not always seen as competitive or attractive, with buses often experiencing delays from congestion, leading to unreliability, particularly at peak times of the day. Rail journeys are relatively slow in comparison to car journeys, particularly for trips between Portsmouth and Southampton, and they are infrequent.
- 4.3.24 The opportunity here is to significantly improve the environment for public transport, with dedicated bus lanes, and work with operators to transform bus and rail services.

The need to work across administrative boundaries

- 4.3.25 Pre Covid, around 40,000 people travelled into the city for work every day, with 30,000 travelling out to work elsewhere⁸¹, which means only part of these journeys will be in the city. Therefore, we must work closely with our neighbours to create the conditions that allow everyone to travel as sustainably as possible. Moreover, some of our key projects, including the delivery of a South East Hampshire Rapid Transit (SEHRT) network, requires close coordination with our neighbouring authorities, transport operators and stakeholders if they are to be successful.
- 4.3.26 The opportunity here is to secure the clear benefits of close cooperation and strategic thinking with our neighbouring Local Transport and Local Planning Authorities. Working together will allow us to prepare more effective strategies that have a positive impact across the Solent and wider South East region.

Emerging Portsmouth Transport Strategy (Local Transport Plan 4)

- 4.3.27 A new Portsmouth Transport Strategy, the Local Transport Plan 4 (LTP4), is being produced for the city to cover the period 2021-2038, replacing the existing LTP3, which was due to cover the period 2011-2031. A revised LTP4 is necessary due to significant changes in central government transport and wider policy, requiring a long term integrated transport strategy that will enable the effective planning of the current transport challenges being faced. Action is needed now to shape a future that accommodates changing travel patterns and the city's growth, in a more sustainable way. The LTP4 will plan for everyone who travels around the city, responding to a range of key local challenges.
- 4.3.28 An ambitious vision has been developed to deliver transformation in transport and travel within the city and wider city region. The vision is that:

⁸¹ Census 2011

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.

4.3.29 Four strategic objectives have been developed to be taken forward in the plan, outlining the areas to be focused on:

1. Delivering cleaner air

Everyone who lives in, works or visits the city should be able to breathe air that will not damage their health, there need to be fewer and cleaner vehicles in the city. To deliver cleaner air we will:

- Introduce a charging Clean Air Zone (CAZ) supported by a number of complementary measures, such as:
 - providing more Electric Vehicle (EV) charge points, including at taxi ranks
 - progressive tightening of taxi licensing rules
 - using the parking permits fee to encourage low emission and fewer vehicles
 - changing parking capacity and pricing, including expanding Park and Ride
 - exploring ways to discourage private off-street car parking while promoting alternatives to car use.

2. Prioritising walking and cycling

Most trips within the city are short, but despite this the car is too often the default choice. More space is needed to safely walk and cycle in the city. To prioritise walking and cycling we will:

- Reallocate road space, so that we can provide traffic-free cycle routes and high-quality walking connections. This will also provide space to safely accommodate new technologies, and investigate micro-mobility opportunities such as electric bikes (e-bikes) and electric scooters (e-scooters).
- The provision of cycle parking will form part of our response, alongside reducing traffic in residential streets, the city centre and high streets.

3. Transforming public transport

Public transport connections are poor in some parts of the city with buses slowed by traffic congestion – we need to prioritise rapid and reliable public transport. To transform public transport we will:

- Introduce a new South East Hampshire Rapid Transit (SEHRT) network and dedicate more road space to it, along with local bus networks. We will also work with bus, coach, rail and ferry operators to deliver wider improvements to services across the city. Building on the Solent Go⁸² work we will include higher frequency services and continue to simplify fares. Improved interchanges at stops and stations alongside local 'Mobility Hubs' will help integrate public transport with

⁸² See <http://solentgo.co.uk/>

'first or last mile' transport such as cycling and cycle hire, to deliver a truly seamless travel experience.

4. Supporting business and protecting our assets

Portsmouth's ports and other businesses are central to the success of the city – we need to ensure the transport network allows business to prosper. We will:

- Focus on providing more reliable access to the ports for essential traffic and will deliver freight consolidation centres that reduce the number of large vehicles on our streets, while reducing costs for businesses.
- We will ensure that works on the highway are properly coordinated and kerbside space is used as efficiently as possible.

4.3.30 The *Local Transport Plan* includes a set of policies have been developed to support the vision and objectives, as follows:

1. Implement a Government directed city centre Clean Air Zone in 2021
2. Deliver infrastructure to support uptake of alternative fuelled vehicles
3. Encourage fewer and cleaner vehicles, for example by maintaining and developing the residents parking permit system and supporting car club
4. Expand the Portsmouth park and ride to reduce pollution and congestion in the city centre
5. Explore private non-residential parking restrictions to encourage mode shift and help pay for improved walking, cycling and public transport infrastructure
6. Deliver residential and business behavior change initiatives to encourage people to walk, cycle and use public transport.
7. Reallocate road space to establish a cohesive and continuous network of attractive, inclusive and accessible walking and cycling routes accompanied by cycle parking facilities.
8. Manage parking through parking controls and introduce a network of low traffic neighbourhoods that reduce 'rat running' traffic in residential streets.
9. Improve the city centre, local and district centres by reducing or removing general traffic, with access focused on walking, cycling and public transport
10. Deliver innovations in micro-mobility to promote transport choice and active transport options
11. Develop a rapid transit network that connects key locations in the city with South East Hampshire, and facilitates future growth
12. Prioritise local bus services over general traffic to make journeys by public transport quicker and more reliable and support demand responsive transport services
13. Deliver high quality public transport interchanges, stations and stops
14. Continue to work with public transport operators to deliver integrated, efficient and sustainable services promoting local and regional connectivity
15. Protect access to the Ports and Portsmouth Naval Base.
16. Support businesses and other organisations to consolidate their operational journeys, including use of zero emission vehicles for last mile deliveries.

17. Deliver micro and macro freight consolidation centres to serve Portsmouth's Businesses
 18. Introduce a lane rental scheme to maximise co-ordination of street works and roadworks, and review loading restrictions to minimize impacts on traffic sensitive routes during peak periods.
 19. Maintain our highway
 20. Proactively manage kerbside space to enable flexible use for essential access
- 4.3.31 The LTP4 Implementation Plan sets out the transport interventions that will be delivered over the lifetime of this plan and will be fundamental in delivering our vision. These include major schemes, such as the charging CAZ, SEHRT and new traffic free cycle routes, as well as a wide range of local schemes, behaviour change programmes and strategies.
- 4.3.32 As the transport interventions are developed we will work openly and collaboratively with local communities, businesses, transport operators, neighbouring local transport authorities, key stakeholders and interest groups to ensure that together we deliver a shared vision for our city.

DRAFT DEVELOPMENT MANAGEMENT POLICY C3: TRANSPORT

- 4.3.33 All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and committed future transport provision, and ensure that any impacts on Portsmouth's transport networks and supporting infrastructure are mitigated. A shift from private car use to more space-efficient and sustainable modes of transport can help to address the air quality, public health and congestion challenges that are currently faced by the city.
- 4.3.34 It is important that development should only be located where it has or can make provision for suitable transport accessibility for its use, with a prioritisation of walking, cycling and public transport, and consideration of a car club where demand supports this with appropriate levels of parking. Such provision will enable physical activity, supporting improvements to public health.
- 4.3.35 The Council is seeking for continual improvement in air quality, beyond the standards set out in the 2008 Ambient Air Quality Directive. Air quality will be a material consideration within and adjacent to AQMAs or the Clean Air Zone, or where the development could give rise to the need for such an area to be designated. Proposals will be required to address means of reducing emissions from all sources and mitigating the impact of air pollution, in particular measures to reduce traffic congestion. Also see *Policy D4: Amenity, Health and Pollution*.
- 4.3.36 In accessing 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.

- 4.3.37 It should be demonstrated how proposals help to remove the barriers to walking, cycling and public transport use in the city and how they support the development of an integrated and sustainable transport network for the city. Any schemes required to mitigate the impact of the development must reflect latest guidance/ best practice. Development should also address wider public health challenges through careful considerations of the impact on air quality, road safety, severance and noise.
- 4.3.38 It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations are secured through the planning process. Transport assessments should be submitted with development proposals to ensure that any impacts on the capacity of the transport network are fully assessed. Any mitigation measures should look at how to minimise vehicle trips in the first instance.

Policy C3: Transport

The Council will work with its partners to deliver a strategy that will reduce the need to travel and deliver a people centred travel network that prioritises walking, cycling and public transport, in-line with the Council's Local Transport Plan 4. This includes:

- Development of future phases of South East Hampshire Bus Rapid Transit
- Links between Tipner and Horsea Island allowing buses, cyclists and pedestrians access between Tipner and Horsea Island, the Horsea Island country park, Port Solent and beyond
- Park and ride extension to create additional capacity and routes
- Improved rail services, including improved journey times to Southampton and London
- Improved transport interchanges and mobility hubs
- Exploration of a new bus depot in the city
- Electric vehicle charge point installation
- Freight consolidation
- Prioritising access to local and district city centres
- Interventions to improve poor air quality from transport sources including introduction of a charging Clean Air Zone
- Exploration of cycle hub at Portsmouth and Southsea station
- Bike Hangars in key locations.

All development proposals should reduce the need to travel, prioritise walking, and cycling, and support and encourage use of public transport modes and improve accessibility to local facilities, ensuring safe and suitable access for all users.

Planning permission will be granted where it can be demonstrated that development proposals:

- Give priority to pedestrian and cycle movements, and address the needs of people with disabilities and reduced mobility.

- Offer high levels of permeability by foot, bicycle and public transport with connections to local walking and cycling networks as well as services and facilities.
- Are located in areas with good public transport connectivity and access to essential facilities and services.
- Create places that are safe, secure and attractive- demonstrating how conflicts between pedestrians, cyclists and vehicles will be minimised.
- Allow for efficient and safe delivery of goods, and access by service and emergency vehicles.
- Provide sufficient space and infrastructure for charging plug-in electric vehicles and other ultra-low emission vehicles and consider provision of car clubs, in accordance with the Parking Standards and Transport Assessments SPD.
- Provide appropriate (which may include car-free) vehicle and bicycle parking in terms of amount, design and layout, and provide a transport assessment and travel plan, in accordance with the Parking Standards and Transport Assessments SPD
- Mitigate 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 and air pollution reduction measures.
- Deliver high quality travel plans working to minimise single occupancy vehicle trips for personal and business purpose and reduce harmful emissions from road transport.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Contribute to reducing air pollution	- Emissions levels.
➤ Prioritising new and improved quality and accessibility of, walking, cycling and public transport infrastructure for all users	- Modal split of journeys in and around the city. - Quantitative data of amount of delivered infrastructure.
➤ Supporting businesses and protecting our assets	- Average journey time. - Monitoring counts of goods vehicles. - Highways maintenance levels.
➤ Improving the safety of all road users in the city	- Accident statistics and surveys.

Question 19: Sustainable Transport

- Do you agree with the proposed approach to Policy C3?
- If not what changes would you suggest and why?

4.4 Infrastructure and Community Benefits (Policy C4)

4.4.1 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' includes physical, social and cultural provisions as well as 'green' infrastructure, which includes:
- Transport (Roads, junctions, buses, ferry services, walking and cycling routes)
- Health (medical or social care facilities).
- Education (early years, schools, skills training and apprenticeships).
- Energy and Utilities (electricity, gas, broadband, water and waste services).
- Social (community centres, leisure, sport and recreational facilities).
- Green (ecological networks, green routes and open spaces)
- Flood risk management (flood defences and sustainable draining systems)

Why is this policy needed?

4.4.2 The 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. Identifying infrastructure needs should be shaped by early engagement between the Council, communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. Local Plans should also set out the contributions expected from development for infrastructure needs.

4.4.3 The Local Plan is one mechanism through which future infrastructure needs may be secured. Infrastructure may also be delivered via contributions from developers. Other provision may be made by the infrastructure providers themselves by aligning their strategies and investment plans with planned growth and development; the Council will continue to work with infrastructure providers to secure delivery of improvements where possible.

Infrastructure Needs in Portsmouth

4.4.4 The new Portsmouth Local Plan will be accompanied by an *Infrastructure Delivery Plan* (IDP). A draft IDP has been published with this consultation document. The final IDP will set out the infrastructure needs associated with the implementation of the new Local Plan, how the required infrastructure will be delivered and how it could be funded. It will identify facilities that are needed city-wide as well as those that are needed to support particular strategic development sites.

- 4.4.5 Key infrastructure providers, Council service providers and other key stakeholders and were contacted to establish the likely infrastructure needs for the plan period. Information was sought on their current levels of capacity, existing levels of use, likely future capacity, any planned improvements and what would be required to support the anticipated levels of development in the City over the Plan period as well as possible costs, funding sources and timescales for implementation. This information was supplemented by available service plans and strategies, including the *Hampshire Strategic Infrastructure Statement* (April 2019).
- 4.4.6 The IDP will updated as needed as the plan progresses to reflect changes in circumstances relating to infrastructure needs and new information including further engagement with infrastructure providers on the evidence gathered to date.

Developer Contributions

- 4.4.7 Developer contributions, secured by planning obligations (such as Section 106 agreements⁸³) 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.
- 4.4.8 The Council adopted a *Community Infrastructure Levy (CIL) Charging Schedule* in 2012. CIL is a standard charge the Council can apply to most new development in Portsmouth. A portion of the CIL funds are also allocated as 'neighbourhood CIL' to be spent on infrastructure more local to the application site (within the same ward)⁸⁴. Contributions may be pooled in order to deliver necessary infrastructure, insofar as compliant with relevant legislation.
- 4.4.9 The Council's *Infrastructure Funding Statement* (IFS) (replaces the previous 'Regulation 123 List') sets out the infrastructure projects or types which the Council intends to wholly, or partly, fund through by CIL. The Statement is updated annually with reporting on CIL requested, collected and spent. The Council has a rolling 5-year Capital Programme within which CIL receipts are allocated to appropriate infrastructure schemes. The IFS list will allow the flexibility for CIL income to be directed to the supporting infrastructure that is most needed in the event of changing priorities for the Council. Infrastructure improvements can tackle wider issues such as reducing congestion and improving air quality.

⁸³ A planning agreement entered into under section 106 of the *Town and Country Planning Act 1990* by a person with an interest in the land and the local planning authority.

⁸⁴Neighbourhood CIL is determined on the percentage of the CIL receipts received for CIL liable development that has taken place within that ward.

- 4.4.10 Planning obligations will continue to be used for infrastructure requirements on development sites as appropriate⁸⁵, to secure site specific needs such local access, connections to services, off-site requirements (such as mitigation land) or off-setting funds (such as air quality improvement schemes). Provision of affordable housing will also continue to be secured via S.106 agreements.

DRAFT DEVELOPMENT MANAGEMENT POLICY C4: INFRASTRUCTURE AND COMMUNITY BENEFITS

- 4.4.11 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 final IDP. Provision will also continue to be secured through appropriate developer contributions as applicable.
- 4.4.12 Progress on the delivery of the infrastructure to serve planned development will be reviewed annually through the Authority Monitoring Report.
- 4.4.13 Requirements for particular types of infrastructure are covered by other policies in the Local Plan.

Policy C4: Infrastructure and Community Benefits

Development proposals will be required to provide or make financial contributions to the infrastructure that is needed to support its delivery and accommodate its impact.

Planning permission will be granted where:

- a. The applicant has demonstrated due consideration of all the infrastructure needs arising from the development;
- b. The proposal meets all the identified on-site and/or off-site infrastructure requirements;
- c. The whole life cost of infrastructure provision has been considered and mechanisms are in place for its future maintenance/care;
- d. A programme of delivery has been agreed with the relevant infrastructure provider(s) prior to commencement.

Development will deliver, or assist with contributing towards the provision of measures to directly mitigate its impact, geographically or functionally, which will be secured through planning obligations.

In assessing the necessary provision or contribution, priority consideration should be given to any specific deficits or impacts identified, and the following, as appropriate:

- Transport (to include EV charging infrastructure)
- Flood Defences
- Education

⁸⁵ As per the statutory tests in Regulation 122 of *The Community Infrastructure Levy Regulations 2010* (as amended)

- Healthcare
- Green Infrastructure
- Recreational Facilities
- Community Safety Facilities

Policy Monitoring	
Policy Aim	Key Indicator
➤ The provision and delivery of infrastructure to support growth	<ul style="list-style-type: none"> - Provision of critical infrastructure and delivery of other project as set out in the IDP. - Annual reporting of CIL contributions and relevant planning obligations.

Further Information

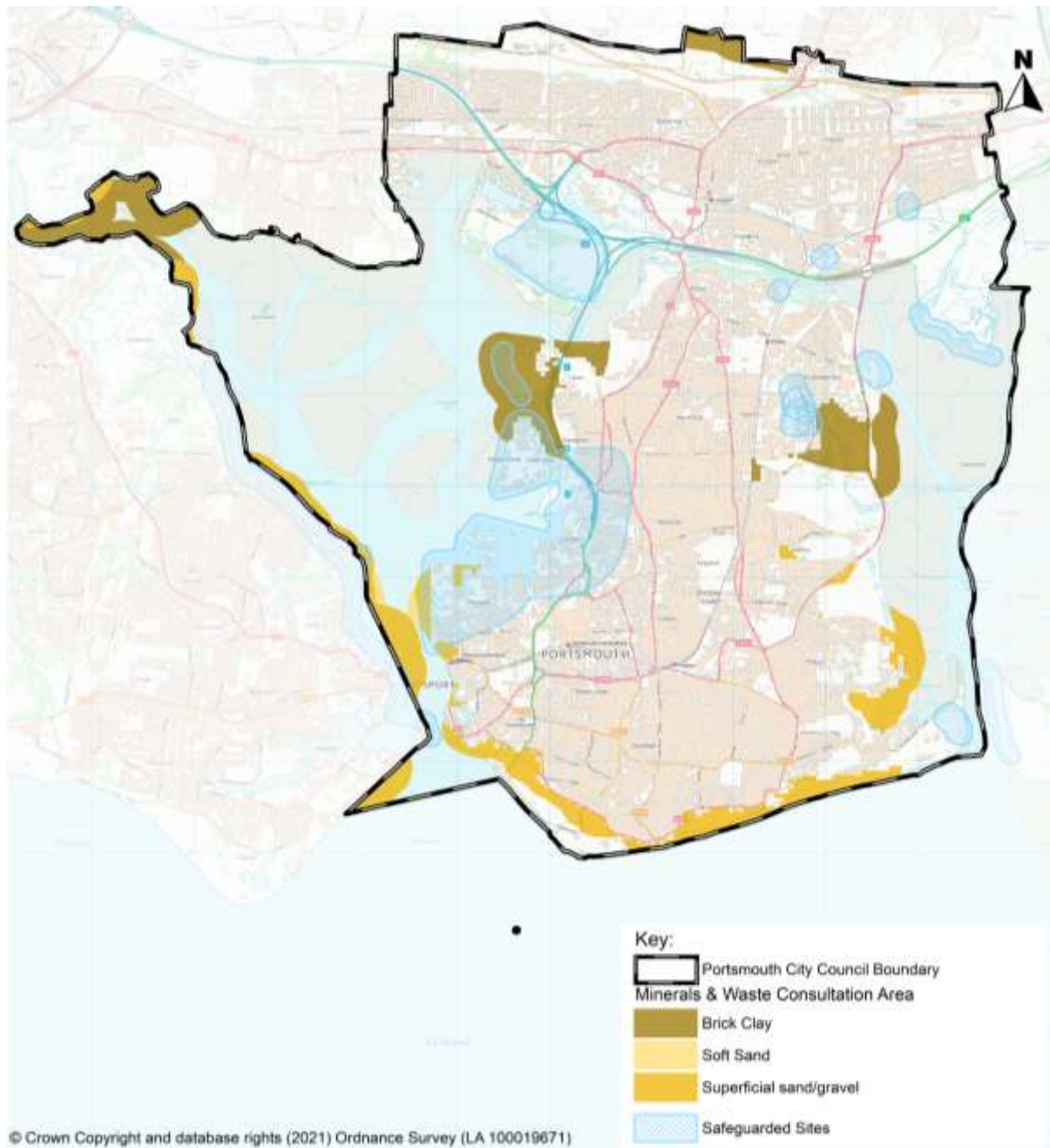
- PCC (2020) *Draft Infrastructure Delivery Plan (IDP)*
- PCC (2012) *CIL Charging Schedule*
- PCC CIL information: <https://www.portsmouth.gov.uk/services/development-and-planning/community-infrastructure-levy-cil/>

Question 20: Infrastructure and Community Benefits

- Do you agree with the proposed approach to Policy C4?
- If not what changes would you suggest and why?

4.5 Minerals and Waste

Figure 19-Minerals and Waste Safeguarding Infrastructure and Resources



- 4.5.1 The goods and products we use every day contain raw materials and energy from minerals. Minerals are finite natural resources which need to be used prudently. While the final disposal of materials as 'waste' is not only a lost opportunity for resource re-use, but can also lead to adverse impacts on the natural environment and human health as well as the release of greenhouse gas emissions

4.5.2 The NPPF's presumption in favour of sustainable development includes the need to facilitate and encourage the sustainable use and reuse of natural resources. This includes ensuring that:

- resource management is considered alongside other spatial planning matters such as housing and transport; and
- existing, planned and potential sites for the transport, handling and processing of minerals and waste are protected to facilitate their long term supply.

4.5.3 Portsmouth City Council, are a Minerals and Waste Planning Authority. The Council works in partnership with Hampshire County Council, Southampton City Council, New Forest National Park Authority and the South Downs National Park Authority ('the Hampshire authorities') on minerals and waste capacity matters in the County. Together the Hampshire authorities produced the *Hampshire Minerals and Waste Plan (HMWP) (2013)*, which aims to enable the delivery of sustainable minerals and waste development up to 2030. The HMWP forms part of the development plan for Portsmouth alongside the Local Plan. The Hampshire authorities are due to commence a partial review of the HMWP in 2021.

Minerals and Waste in Portsmouth

4.5.4 The Portsmouth area contains safeguarded reserves of Brick Clay, Superficial Sand and Gravel and Soft Sand and a number of minerals and waste processing facilities (See Map #). This includes a waste transfer station, material recycling facilities, concrete batching plants, an energy recovery facility and a mineral importation wharf in Langstone Harbour.

4.5.5 As the Portsmouth area is already highly developed, mineral safeguarding areas are limited to important reserves beneath areas of open space. Although such areas in Portsmouth are already constrained by other environmental designations, particularly around Southsea Common and Langstone and Portsmouth Harbours; any development proposals in these areas would need to take the mineral safeguarding designation into account.

4.5.6 The HM Naval Base and Commercial Docks in Portsmouth are also identified for protection as a potential site for minerals and waste wharf infrastructure, should the land in an appropriate location be released from the present military or port uses by the Port Authority in the future.

Approach to minerals and waste development

4.5.7 Proposals for new minerals and waste development, and any proposal development likely to impact upon existing or proposed minerals and waste infrastructure (and their operational capacity), or safeguarded mineral resources, will be considered in accordance with national planning policy, the HWMP policies

and supplementary guidance, and the Portsmouth Local Plan policies where relevant.

4.5.8 The HMWP policies, in-line with national planning policy, are based upon the principles of encouraging the reduction, beneficial re-use or recycling of wastes and the use of substitute or secondary and recycled minerals to lessen the need for extraction of primary mineral resources from the land or sea. The Council, through *Policy R1: Sustainable Design and Construction*, encourages all development to be designed to achieve the highest level of environmental sustainability possible, during operation and the construction process. This includes:

- The efficient use of natural resources, including minerals and identifying opportunities to reuse or recycle materials/ minerals in construction, as well as reusing old buildings where appropriate.
- Minimising waste at and recycling as much as possible.

4.5.9 The Council will continue to work in partnership on minerals and waste management and supply matters with the Hampshire authorities and other neighbouring authorities, including on any review of the HMWP.

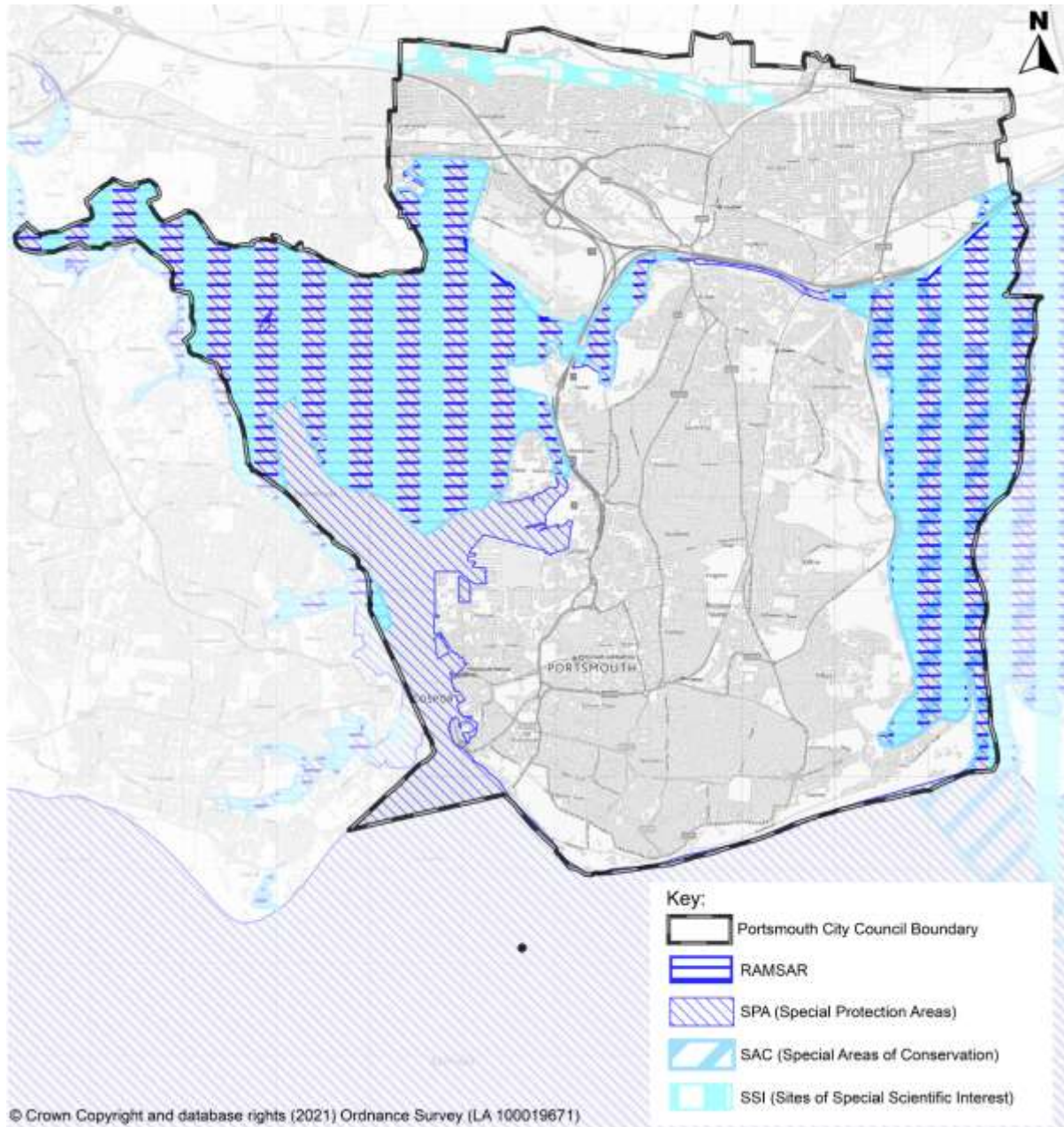
Further information:

- The Hampshire Waste and Minerals Plan:
<https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan>
- Mineral Safeguarding Supplementary Planning Document.

5 - Portsmouth's Environment

5.1 Biodiversity (Policy G1)

Figure 20- International and National Nature Designations



5.1.1 Biodiversity is the number, variety and variability of living organisms within a given area. Areas of Portsmouth benefit from a rich and diverse biodiversity stemming from its unique environment as the UK's only 'island city'; surrounded by the Solent to the south and Langstone and Portsmouth Harbours to the east and west, separated from the mainland by Portsbridge Creek and bordered by Portsdown Hill to the north.

5.1.2 The Portsmouth and Langstone Harbours and Solent coastal waters are protected by a number of overlapping international and national nature designations. The estuary and intertidal habitats provide ideal environments for overwintering bird species to feed and roost and for the growth of rare core grass and salt meadow species. The wider coastal region is also important for its saline lagoons and terrestrial foraging grounds for species of tern. Portsdown Hill is nationally recognised for its species rich chalk grassland while Farlington Marshes and Milton Lock provide valued local nature reserves. There are number of local wildlife sites throughout the city ranging from sandunes and vegetated shingle beaches, ponds, grasslands, woodland, parklands and hedgerows. Portsmouth is also home to 30 of the 50 Hampshire Priority Species including varieties of bees, beetles, birds, butterflies, moths, plants and other insects and marine related species.

Why is this policy needed?

5.1.3 The *State of Nature Report* (2019) indicates that global biodiversity has declined by more than a quarter in the last 35 years and that one in ten UK species are threatened with extinction. In Hampshire 48% of monitored species were found to be showing signs of decline in 2016/17⁸⁶. While biodiversity is valued in its own right, losses would impact the ecosystem 'goods' (e.g. food, water and construction materials) and 'services' (e.g. climate regulation, pollination and recreation) vital to sustaining well-being and future social and economic development. Protecting biodiversity is therefore important for achieving a wide range of planning objectives.

5.1.4 National planning policy states that planning decisions should enhance the natural and local environment by minimising impacts on, and providing measurable net gains for, biodiversity. This is to include the identification, conservation, restoration and enhancement of ecological networks in order to help build resilience against current and future pressures on biodiversity.

5.1.5 The Council must also comply with the requirements and assessment procedures of the relevant legislation on habitats, birds and water in order to protect the Solent's sites of national and international importance for nature conservation.

Portsmouth's Ecological Network

5.1.6 Portsmouth's identified ecological networks, which form part of wider networks across the county and beyond, are as follows:

- International, national and locally designated sites of importance for biodiversity and their functionally linked land (including the *Solent Wader and Brent Goose Strategy* site network).

⁸⁶ Monitoring updated every five years.

- Designated local green or open spaces, veteran trees, important hedgerows and watercourses.
- Protected and notable species and their habitats.
- Areas identified for compensatory measures for adverse effects on biodiversity
- Identified areas or networks for habitat creation and/or recovery, including 'buffer zones', wildlife corridors and the habitat 'stepping stones' that connect them.

Designated Sites of Importance for Nature Conservation

5.1.7 The international, national and locally (non-statutorily) designated sites for nature conservation in the Portsmouth area are set out in Table 6. Any identified compensatory habitat or proposed SPA, SACs and Ramsar Sites and are given equal status to existing sites in terms of their protection.

Table 5 -Hierarchy of Nature Designations in Portsmouth

Hierarchy of Nature Designations in Portsmouth		
➤ International	➤ National	➤ Local
- Ramsar Sites	<ul style="list-style-type: none"> - Special Protections Areas (SPAs) - Special Areas of Conservation (SACs) - Sites of Special Scientific Interest (SSSIs) 	<ul style="list-style-type: none"> - Local Nature Reserves (LNRs) - Local Wildlife Sites or 'Sites of Importance to Nature Conservation' (SINCs) - Roadside Verges of Ecological Importance (RVEIs) - Hampshire Priority Habitats and Species
Existing Sites		
<ul style="list-style-type: none"> - Portsmouth Harbour Ramsar - Chichester and Langstone Harbours' Ramsar 	<ul style="list-style-type: none"> - Portsmouth Harbour SPA - Chichester and Langstone Harbours SPA - Solent and Isle of Wight Lagoons SAC - Solent Maritime SAC - Solent and Dorset Coast SPA - Portsdown Hill SSSI - Portsmouth Harbour SSSI - Langstone Harbour SSSI 	<ul style="list-style-type: none"> - Milton Lock LNR - Farlington Marshes LNR - 28 SINCs, 2 RVEIs and 30 Priority Habitats/ Species

Solent Waders and Brent Geese

5.1.8 There are a number of areas within Portsmouth that provide alternative roosting and foraging locations for Solent Waders and Brent Geese (qualifying and

assemblage species of the Solent SPAs); these areas therefore linked to the 'functionality and integrity' of the conservation objectives of the Solent SPAs.

- 5.1.9 The *Solent Waders and Brent Goose Strategy* (2020) identifies and classifies sites according to their relative importance to maintaining the regional ecological network for these key species. While the preferred approach is for development to be located outside of the identified site network, the Strategy provides guidance on the appropriate mitigation and off-setting requirements for each site classification for instances where direct or in-direct effects are likely. Replacement habitat or compensatory measures would be required where impacts cannot be avoided or adequately mitigated on-site.
- 5.1.10 Development affecting a *Solent Waders and Brent Geese Strategy* 'Core Area' would be considered as a significant adverse impact on an SPA and subject to assessment under the Habitat Regulations. However, all proposals affecting the network of sites will be considered on a case by case basis by the Council, in accordance with the Regulations. As the Strategy is due to be regularly reviewed with new survey information, it should be noted that the identified Solent Waders and Brent Geese sites may be reclassified during the plan period.

Biodiversity Opportunity Areas and Nature Recovery Networks

- 5.1.11 Biodiversity Opportunity Areas (BOAs) and wider ecological network opportunities have been identified around the major concentrations of priority habitat in Hampshire. The focus is largely on opportunities around existing designations at Portsdown Hill, Portsmouth Harbour and Langstone Harbour and other green and/or open spaces within the city, with the aim of linking, expanding and/ or restoring habitat corridors as part of wider recovery networks.

Green Infrastructure Network

- 5.1.12 Portsmouth ecological networks overlap with the city's proposed Green Infrastructure (GI) network. The GI network aims to enhance and create multi-functional, connected green spaces which have a range of benefits for the biodiversity and the health and well-being of the local community. The Council's GI network and proposed new green corridors are detailed in Section 5.2.

Minimising Impacts on Biodiversity

- 5.1.13 The Council's approach to biodiversity is to not only to conserve existing habitats but to minimise impacts where possible.

Recreational Disturbance

- 5.1.14 New homes in proximity to the Solent SPAs have led to more people visiting the coastline for recreation, potentially causing additional disturbance to overwintering birds. Disturbance can mean the loss of feeding and resting time, stress, or even the gradual avoidance of suitable habitat areas. The *Solent Recreation Mitigation*

Strategy (December 2017) provides a mitigation scheme for the impacts of recreational visits arising from the planned new homes for the Solent area up to 2034. The Strategy's mitigation measures, focusing on site management and encouraging behavioural change, are funded through requiring developer contributions for each net additional dwelling within a 5.6km radius of the SPAs. There is the option for developers to put forward alternative mitigation packages, subject to agreement with Natural England.

Tall Buildings

- 5.1.15 The design of buildings (e.g. 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.
- 5.1.16 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.

Disturbance from Construction

- 5.1.17 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.
- 5.1.18 Where construction works will occur in a precautionary 300m buffer zone around the European 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); or in other words, an 'acceptable' dose of noise is attained.
- 5.1.19 For any construction works carried out within the Portsmouth Harbour SPA / Ramsar such mitigation measures are likely to be insufficient if the work is undertaken during the core winter/ passage period. In such cases, the construction programme must 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.
- 5.1.20 Minimising impacts on biodiversity will also be achieved in-combination with other Local Plan policies on encouraging urban greening (*Policy G2: Green Infrastructure*), the use of sustainable drainage methods (*Policy G5: Flood Risk and Drainage*), and seeking to improve air quality (*Policy D4: Low Carbon and*

Carbon Neutral Development, Policy C3: Sustainable Transport, Policy D3: Pollution, Health and Amenity and Policy G3: Water Quality).

Seeking Net Gains for Biodiversity

- 5.1.21 New development will need to consider the potential impacts upon local ecology and opportunities for delivering net gains for biodiversity, to be led by an understanding of Portsmouth's ecological networks. This could incorporate the following:
- Opportunities for creating, linking, buffering, restoring or enhancing habitats and wildlife corridors in the layout or design features of new development, and allowing migration through sites where possible.
 - Small-scale biodiversity measures such as green roofs, roosting or nesting provisions on buildings, or the planting of street trees or wildflowers.
 - Green space and other GI features.
 - Securing management for long-term biodiversity enhancement.
- 5.1.22 Net gains in biodiversity will need to be quantifiable and capable of being secured by planning condition. Contributions to biodiversity enhancement may be sought where sufficient net gain cannot be delivered on-site. The Council is currently preparing a shortlist of suitable projects, in conjunction with key stakeholders, for biodiversity creation and/or enhancement for which off-site contributions could be made to ensure biodiversity net gains are primarily delivered within the city.
- 5.1.23 The requirement for all new development to deliver net gains in Biodiversity (potentially a minimum of 10%) is due to be mandated with the enactment of the Environment Act (expected later in 2021). Further planning guidance will be produced on how these requirements could be applied in Portsmouth's urban environment.

- 5.1.24 Policy G1 identifies the city's ecological networks for protection. However, to ensure decline is not simply shifted to other areas or species, all development proposals are expected to provide information on the ecological value of application sites, consider the potential ecological impacts and seek net gains in biodiversity. This will help to enable opportunities for biodiversity enhancement across the city.
- 5.1.25 Ecological assessment should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity, and carried out in accordance with appropriate professional standards.
- 5.1.26 The Council will continue to engage with the relevant statutory consultees, partner authorities and local nature partnerships to help inform the approach to biodiversity enhancement in Portsmouth.

Policy G1: Protecting and Enhancing Biodiversity

Development proposals must seek to conserve and enhance the natural environment wherever possible, and safeguard the components of Portsmouth's ecological networks.

Planning permission will be granted where:

- a. The ecological value of the application site has appropriately identified and assessed, and any matters arising have been addressed in the development proposal at the earliest stage possible;
- b. Development avoids harm to the identified components of the Portsmouth ecological network, and it can be demonstrated that opportunities for conservation, restoration and enhancement of networks have been explored. Any unavoidable harm to biodiversity must be appropriately mitigated, or as a last resort, adequately compensated for;
- c. Development would result in measureable net gains in biodiversity;
- d. Proposals are in-line with the requirements of habitat mitigation or compensation schemes effective within the Portsmouth City Council area, including the *Solent Recreation Mitigation Strategy*.

Development proposals greater than 0.1 hectares (1000 sq m), or all proposals that would lead to the loss of known biodiversity interest, must be supported by a *Phase 1 Extended Habitat Survey* and *Biodiversity Mitigation and Enhancement Plans*, and/ or compensation plans as appropriate, with provisions for on-going management and monitoring.

For proposals affecting **international nature conservation designations**, planning permission will be refused where:

f. There is likely to be a significant adverse effect on an existing or proposed SPA, SAC or Ramsar designation, or land identified as compensatory measures for adverse effects on these designations (and the proposal is not directly connected with, or necessary to, the management of that site); and

g. The development proposal is not in compliance with the relevant regulations and national policy regarding the assessment of implications for SPAs, SACs or Ramsar sites.

For proposals affecting **national nature conservation designations**, planning permission will only be granted where:

h. Development does not have an adverse effect on a site's interest features, either individually or in-combination with other developments.

i. The benefits of the development clearly outweigh both the likely impact on the site's interest features, and any broader impacts on the national site network.

For proposals affecting **local nature conservation designations**, planning permission will only be granted where:

j. The value of the site or feature is retained or enhanced in-line with its original criteria for designation through avoidance or mitigation measures; or

k. The benefit of the development can be shown to clearly outweigh the nature conservation value of the site, impacts cannot be avoided or mitigated, and adequate compensation measures have been agreed.

Policy Monitoring	
Policy Aim	Key Indicator(s)
➤ Biodiversity conservation, enhancement and restoration	<ul style="list-style-type: none"> - Planning applications refused on biodiversity grounds. - Extent of priority habitat and nature conservation designations. - Condition of SSSIs. - Status of notable species - Planning applications granted subject to developer contributions to Solent Recreation Mitigation Strategy, and/ or other agreed habitat mitigation or compensation schemes effective in the Portsmouth City Council area.
➤ Biodiversity net gains	<ul style="list-style-type: none"> - Planning applications granted with a Biodiversity Mitigation and Enhancement Plan.

Further Information:

- PCC (2021) Biodiversity background paper for the Portsmouth Local Plan evidence base

- Aecom (2021) Habitat Regulations Assessment Report
- *Solent Recreation Mitigation Strategy* (Dec 2017) and website: <http://www.birdaware.org/>
- *Solent Waders and Brent Goose Strategy* (Oct 2018) and website: <https://solentwbgs.wordpress.com/>
- Hampshire Biodiversity Information Centre: <https://www.hants.gov.uk/hbic>

Question 21: Biodiversity

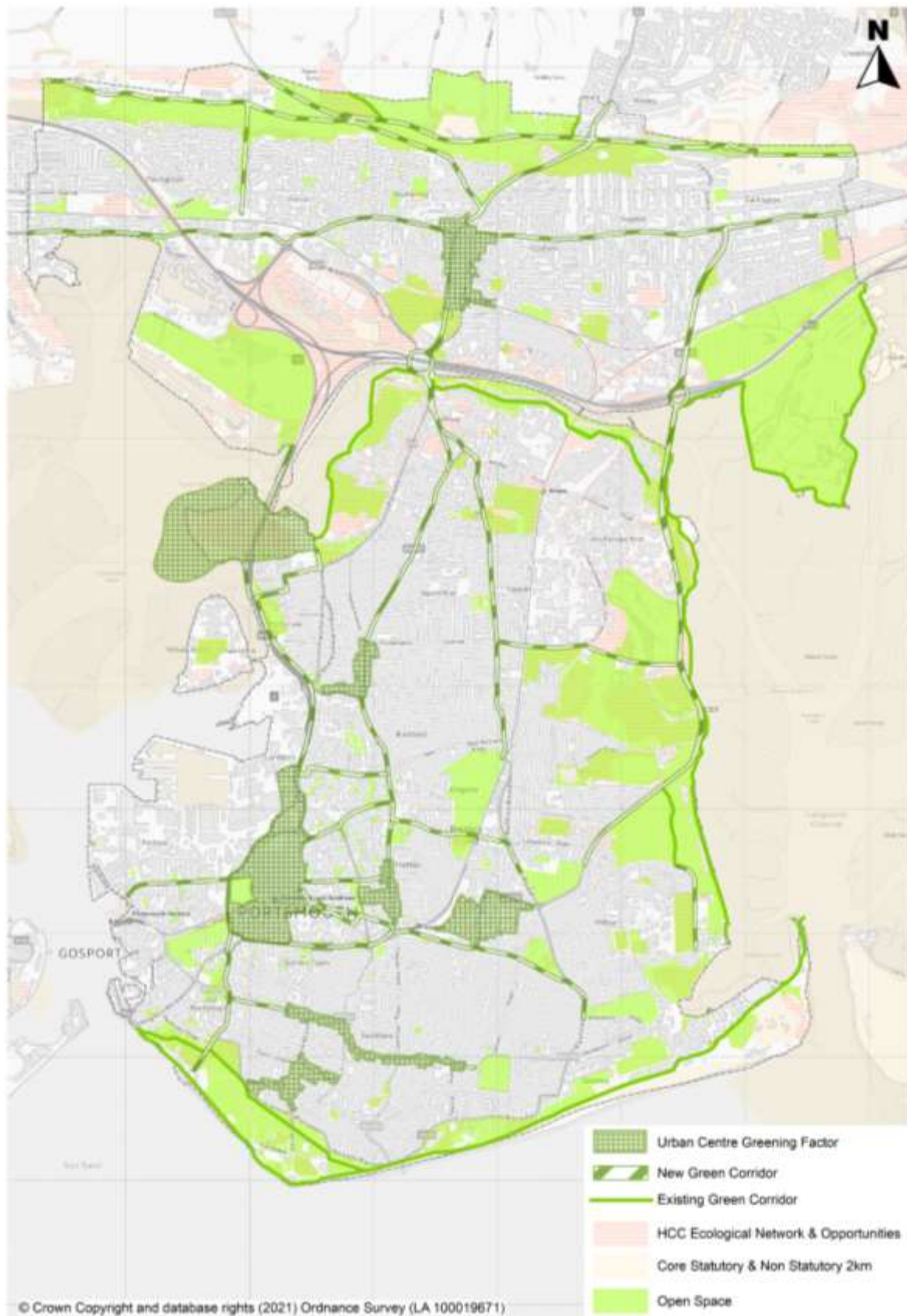
a. Do you agree with the proposed approach to Policy G1? If not what changes would you suggest and why?

b. How should new development seek to deliver biodiversity net gain within Portsmouth's urban environment?

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5.2 Green infrastructure (Policy G2)

Figure 21-Green Infrastructure Map



- 5.2.1 'Green Infrastructure' (GI) is a network of natural assets which includes parks, open spaces, playing fields, woodlands, allotments and private gardens as well as other features such as street trees, hedgerows, green roofs and walls. The term doesn't just refer to green assets but encompasses 'blue' features such as streams, ponds and other water bodies.
- 5.2.2 Green infrastructure coverage varies across the city; green space is more prevalent the northern and coastal areas of the city with a more fragmented pattern in central sections of Portsea Island. Being a coastal city, blue infrastructure in the form of the open coast is also an important part of the network and the character of Portsmouth. Tree canopy cover within Portsmouth was estimated to be 9.8% (86,500 trees) in 2017.

Why is this policy needed?

- 5.2.3 The Council has ambitious plans to increase the amount of greenery in the city, including a commitment to doubling the number of trees over the next 25 years⁸⁷. However, the city's green infrastructure network is under increasing pressure from population growth, climate change and other competing development needs. National planning policy states that the Local Plan has a role in ensuring a strategic approach to maintaining and strengthening habitat and green infrastructure networks, and that planning for green infrastructure should be considered in the same way as provision for 'grey' infrastructure (such as roads, sewers and services).
- 5.2.4 The Partnership for South Hampshire (PfSH), have produced a *South Hampshire Green Infrastructure Strategy 2017-2034* and *Implementation Plan* which aims to enhance connectivity across the sub-region through a range of projects, including the 'South Hampshire Green Grid'. The city's own green infrastructure network will need to reflect and integrate with that of the wider sub-region.

Greening the City

- 5.2.5 An analysis of the 'green' coverage and ecological networks across the city was undertaken to identify opportunities to improve the connectivity of GI, both within Portsmouth and to networks beyond the city boundary across Hampshire. The development of the network took into account the areas of the city with lesser GI coverage and/or higher levels of deprivation and health inequality, key centres and identified development areas and proposals for new and/ or enhanced walking and cycling infrastructure.
- 5.2.6 The proposed Green Infrastructure Network for Portsmouth is shown in Figure 20. The network is made up of existing key 'green corridors', identified for protection for their existing GI value, and proposed new corridors to be prioritised for

⁸⁷PCC (March 2020) *Greening Portsmouth Strategy*

greening during the plan period. These routes will strengthen the existing green infrastructure network and enhance connectivity between green spaces.

- 5.2.7 Proposals for new development on, or adjacent to, these corridors will be required to protect and contribute towards the creation or enhancement of green infrastructure as appropriate. Such enhancements could include setting back development to incorporate new trees and other forms of planting (such as wildflower meadows or Sustainable Drainage Systems (SuDs)), or utilising the spaces above the street (such as the use of green walls and roofs).
- 5.2.8 The proposed GI network also identifies areas that present opportunities to deliver additional greening, given their current lack of green coverage and/ or proposals for more significant redevelopment during the plan period. To help quantify this, an Urban Greening Factor (UGF) tool has been developed to accompany planning applications submitted within the UGF areas (as identified on Figure #). The UGF tool allows for a simple assessment process comparing green infrastructure coverage on a proposed development site, pre and post development. Betterment in GI provision through on-site net gains is required, though there is flexibility for how this is achieved⁸⁸. A completed assessment will need to accompany all development proposed within these areas.
- 5.2.9 The use of the UGF tool is also strongly encouraged for all proposals as a simple way to demonstrate net gains in green infrastructure. This also helps to provide a consistent basis to estimate the green infrastructure gains for Portsmouth across all proposals.

Green Infrastructure principles for new development

- 5.2.10 Proposals should not result in net losses to the green infrastructure network, and seek to provide net gains where possible. Any losses, which cannot be avoided, should be replaced by appropriate and proportionate provisions, which will be expected to be delivered on-site in the first instance. The replacement green infrastructure does not necessarily need to be like for like in terms of type, but should be of equal or higher quality and/ or functionality.
- 5.2.11 New green infrastructure should be central to the design of the development and should be 'multi-functional' where possible, providing benefits not only to biodiversity and the wider environment but also to the quality of the public realm and health and well-being. Such functions could include:
- Promoting greater biodiversity, allowing species to move between habitat areas.
 - Providing more attractive routes for walking and cycling.
 - Protecting and enhancing heritage assets.

⁸⁸ Further explanation of the UGF tool can be found in *Green Infrastructure background paper* (PCC, 2021)

- Cooling of urban areas to help to mitigate the 'urban heat island' effect.
 - Slowing surface water runoff and improving flood and climate change resilience.
 - Filtering or buffering of pollutants, contributing to improved air quality.
 - Providing a source of locally grown food.
 - Making areas more attractive to economic investment.
- 5.2.12 Opportunities to ensure schemes include 'interactive' green infrastructure are encouraged, embedding features in the streetscape level, where practicable. Making use of more traditionally 'wasted spaces' or vertical spaces, such as the walls and rooftops are also encouraged, as appropriate.
- 5.2.13 The city's trees are recognised as a key component of the network; many are afforded special protection either for their amenity or 'irreplaceable'⁸⁹ value through Tree Preservation Orders (TPOs), or as part of the setting of the city's Conservation Areas. These protections are a material consideration in the determination of any application where designated trees would be affected. Separate permissions are required for any proposed works to protected trees. The Council is continually reviewing and updating its TPO register, and may designate new TPOs where the amenity value of a tree is deemed to be at risk.
- 5.2.14 Green infrastructure schemes will need to be supported with appropriate on-going maintenance and management. This may be secured by condition/ planning obligation attached to any grant of planning permission.

DRAFT STRATEGIC POLICY G2: GREEN INFRASTRUCTURE

- 5.2.15 *Policy G2: Green Infrastructure* establishes and protects the city's network of green spaces and seeks to ensure new development will enhance and deliver net gains in green infrastructure, especially along new or existing walking and cycling routes. Use of the UGF tool to demonstrate net gains is required within the identified UGF areas, and is encouraged for all applications.
- 5.2.16 The Council is keen to promote the multi-functionality of these spaces where possible; the proposed network overlaps with the draft policies protecting the city's open spaces (*Policy C2: Open Space and Outdoor Recreation*) and ecological networks (*Policy G1: Biodiversity*). Proposals are encouraged to incorporate

⁸⁹ Irreplaceable habitat, as defined in the NPPF Glossary, includes veteran and ancient trees: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.

greening where possible as part of the biodiversity net gain provisions (required by Policy G1) to help deliver a greater range of benefits for the city.

- 5.2.17 The Council, through its *Greening Strategy*, climate change and air quality commitments, will continue to strive to enhance green infrastructure coverage in the city, in-line with the proposed green infrastructure network routes and identified key areas for greening.

Policy G2: Green infrastructure

All proposals should demonstrate how green infrastructure has been integral in the design of development, and opportunities for net gains and/or enhancements have been explored.

Planning permission will be granted where:

- Development avoids a net loss in green infrastructure and harm to the network, any unavoidable harm must be appropriately mitigated, or as a last resort, adequately compensated.
- Development on, or adjacent to, the proposed green infrastructure network protects and/ or contributes to the creation, enhancement and connectivity of the network as appropriate.
- Development within the identified 'Urban Greening Factor' (UGF) areas demonstrates an increase in green infrastructure, via the UGF tool.
- Green infrastructure proposals are accompanied by an agreed maintenance and management plan, including provision to replace failed infrastructure.

Protecting Trees

Proposals resulting in the loss or deterioration of ancient woodland, 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 with the Council.

Planning permission will be granted where:

- Proposals can demonstrate how they have been informed and influenced by the presence of trees on the site, and with particular regard to any TPO designations.
- It can be demonstrated satisfactorily that the need for and benefits of the development clearly outweigh any loss or deterioration of woodlands, hedgerows or high amenity trees.

If removal of any trees or hedgerows is necessary, an appropriate replacement of at least equal value will need to be reprovided on-site, unless it is demonstrated to be impractical to do so. Where on-site planting is not possible, the provision off-site compensation could be considered where possible to negate losses in canopy cover in the local area.

Policy Monitoring	
Policy Aim	Key Indicator(s)
➤ Quantifiable net gain in green infrastructure in the city.	- Square metres of additional green infrastructure incorporated into new development each year, measured the urban greening factor where possible.
➤ Increasing tree canopy cover in the city	- % increase in canopy cover of the city's land surface. ⁹⁰
➤ Protecting trees	- Loss of TPO designations as result of planning permissions

Further Information:

- PCC *Green infrastructure background paper (2021)*
- PCC *An assessment of Tree Canopy Cover in Portsmouth (2019)*
- PCC *Greening Portsmouth Strategy (2020)*
- PFSH *Green Infrastructure Strategy 2017-2034 and Implementation Plan (2019)*: <https://www.push.gov.uk/work/planning-and-infrastructure/green-infrastructure-flooding-water-management/>

Question 22: Green Infrastructure

- a. Do you agree with the proposed approach to Policy G2?
- b. If not what changes would you suggest and why? For instance, are there any proposed green infrastructure routes that should be added or removed from the policy?
- c. Is the proposed Urban Greening Factor (UGF) Tool an appropriate way to secure and measure net increasing in green infrastructure? 20d. Do you agree with the proposed locations for the UGF tool to be applied to new development?

⁹⁰ Data updated every 2-3 years.

5.3 Water Quality (Nutrient Neutrality) (Policy G3)

- 5.3.1 The Solent region is internationally important for its coastal habitats and species and has national level protections for many parts of the coastline and seas. High levels of nitrogen and phosphorus flowing into this environment is causing eutrophication⁹¹ and adverse impacts on the water quality of designated habitat sites, with some areas classified as being in an 'unfavourable' condition.
- 5.3.2 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 (WWTWs) may be having a cumulative impact on protected habitats in-combination with other sources of nitrates.

Why is this policy needed?

- 5.3.3 There is uncertainty regarding the impact of new housing (and other development resulting additional overnight stays) and the associated additional wastewater outputs, on the deterioration of the water environment of designated habitat sites. Under the requirements of the *Habitat Regulations*⁹², this uncertainty must be appropriately addressed in order for the assessment of such proposals to be legally compliant. This issue applies to all such proposals, as any increase is deemed significant (e.g. one additional dwelling), due to the in-combination impacts.
- 5.3.4 Natural England, the government's advisor the natural environment, has issued guidance on achieving of 'nutrient neutrality' for development proposals, which with a calculated Nitrogen Budget and if scientifically and practically effective, is considered an acceptable means of ensuring that proposal would not add to existing nutrient burdens.
- 5.3.5 Planning applications, permissions in principle and prior approvals⁹³ for the following are required to be 'nutrient neutral':
- New dwellings and residential accommodation, including changes of use (e.g. office to residential).
 - Homes in Multiple Occupation enlargements (Class C4 Use to Sui Generis Use).

⁹¹ Eutrophication is a process where an excessive richness of nutrients causes a dense growth of plant life and algae, which depletes the oxygen available in the water body which can harm aquatic species.

⁹² *Conservation of Habitats and Species Regulations (England and Wales) Regulations 2017 (as amended)*

⁹³ Under the provisions of Schedule 2 of the *Town and Country Planning (General Permitted Development) Order (England) 2015 (as amended)*.

- Hotels and dwellings to be used as holiday accommodation (e.g. caravans).
- Tourism attractions.

Addressing the Sources of Nutrient Pollution in the Solent Region

- 5.3.6 The nitrogen outputs from new development into the Solent's water environment are a minor input compared to other sources of nitrate pollution,⁹⁴ such as agricultural runoff or heavy industry. This has been worsened by underinvestment in the necessary infrastructure by the wastewater industry, resulting in untreated sewage going directly into protected water bodies. Discussions will continue with government agencies and the wastewater industry on addressing the sources of nitrate pollution and the damage from illegal pollution spills. One route is a review of the nitrogen levels for WWTW permits in the Solent by the Environment Agency and Southern Water's Drainage and Wastewater Management Plan (DWMP)⁹⁵ for the East Hampshire river basin catchment.
- 5.3.7 The council, together the other Local Authorities within the Solent catchment, will continue to investigate a range of possible mitigation options, with a strong preference for schemes that will deliver wider environmental benefits, particularly in light of the Climate Emergency declared by the Council in March 2019. This includes establishing a co-ordinated land use change programme, in partnership with third parties such as the Hampshire & Isle of Wight Wildlife Trust, as a short to medium term solution. Defra is also in the project development stages of establishing a Nitrate Trading Platform for offsetting opportunities.
- 5.3.8 The Council will continue to engage on suitable opportunities to help enable the delivery of new housing and other key development in the city.

Interim Mitigation Solutions

- 5.3.9 The Council's *Interim Nutrient Neutral Mitigation Strategy*, provides a potential framework for applicants to be able to meet the tests of the Habitat Regulations and secure mitigation in perpetuity. The Council's interim solution is focused on helping to enable minor development from small and medium house builders and the Council's housing delivery projects in the city. It is based on the principle of utilising 'mitigation credit' generated from sources such as water efficiency upgrades to council owned and controlled housing stock and off-setting credit secured from other sources including land purchase and management change schemes. These savings, in combination with securing higher water efficiency standards for new development by condition⁹⁶, are intended to ensure that there is

⁹⁴ The impact of the sewage output from Portsmouth on the protected Solent habitats is explored in detail in *Review of the Need for Nutrient Neutral Development in the Budds Farm Wastewater Treatment Works Catchment* (Ricardo, June 2020)

⁹⁵ DWMPs are long-term investment plans for drainage and wastewater management to ensure the sustainability of drainage infrastructure and systems.

⁹⁶ A maximum of 110 litres per person per day - see *Policy R1: Sustainable Design and Construction*.

no net increase in wastewater from the city area to its Wastewater Treatment Works (WwTws).⁹⁷ The *Interim Strategy* includes a cost recovery schedule for developers as applicable. Major development proposals required to seek their own mitigation solutions in the first instance.

- 5.3.10 It is possible to apply a mix of mitigation options, as agreed with the Council and Natural England. All mitigation measures would need to be able to delivered prior to first occupation, which is when the harm would occur in this instance. A phasing of delivery and mitigation is possible for larger developments.
- 5.3.11 All applications will still be assessed by the council on a case-by-case basis in consultation with Natural England.

DRAFT DEVELOPMENT MANAGEMENT POLICY G3: WATER QUALITY (NUTRIENT NEUTRALITY)

- 5.3.12 Proposals must be able to satisfactorily demonstrate nutrient neutrality can be secured for the development in perpetuity, in order to meet the requirements of the Habitat Regulations given the potential for a cumulative impact upon the Solent's water environment.
- 5.3.13 All mitigation proposals will be subject to consultation with Natural England and early discussion with the Council is encouraged for bespoke schemes.
- 5.3.14 Appropriate legal agreements and planning conditions will be required to ensure mitigation is in place before occupation (when the impact will occur), whether this is through the applicant's own proposals (including third party agreements) and/ or the Council's mitigation credit.

Policy G3: Water Quality (Nutrient Neutrality)

Proposals (planning applications, permissions in principle and prior approvals) for applicable development will only be granted permission where it can be demonstrated that development can be 'nutrient neutral' for its lifetime. This applies to:

- New dwellings and residential accommodation, including changes of use.
- Homes in Multiple Occupation enlargements (C4 Use to Sui Generis Use)
- Hotels and dwellings to be used as holiday accommodation
- Tourism attractions

All applications must be accompanied by a calculated Nitrogen Budget.

⁹⁷ Budds Farm WwTws in Havant

Policy Monitoring	
Policy Aim	Key Indicator
To ensure new development involving or generation new overnight stays is nutrient neutral.	Applications refused under Policy G3

Further Information:

- PCC (2019) *Interim Nutrient Neutral Mitigation Strategy for New Dwellings*
- Natural England's *Advice On Achieving Nutrient Neutrality For New Development in The Solent Region and Non-technical Summary* (June 2020)
- Natural England's *Nitrogen Budget Calculator* (June 2020)
- *Review of the Need for Nutrient Neutral Development in the Budds Farm Wastewater Treatment Works Catchment* (Ricardo, June 2020)

Question 23. Water Quality (Nitrate Neutrality)

- Do you agree with the proposed approach to Policy G3?
- If not what changes would you suggest and why?

5.4 Contaminated land (Policy G4)

- 5.4.1 Portsmouth's coastal location and long history of industrial 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.

Why is this policy needed?

- 5.4.2 To prevent unacceptable risks from contamination and land instability, the national guidance states that planning policies and decisions should ensure that new development is appropriate for its location, as well as taking account of the impacts of the proposed use. New development must take account of ground conditions and any risks arising from contamination, including risks arising from natural hazards or former activities.

DRAFT DEVELOPMENT MANAGEMENT POLICY G4: CONTAMINATED LAND

- 5.4.3 To address land contamination in Portsmouth, the applicant should seek to identify any potential issues are identified and discussed with the Council as early as possible in the development process.
- 5.4.4 Where contamination is known, or is suspected, and a sensitive land use (e.g. housing) is proposed, planning applications must be supported by sufficient information from desk study and intrusive investigation to demonstrate that remedial measures are available to make the site safe for the proposed end-use.
- 5.4.5 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.
- 5.4.6 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
- 5.4.7 Development proposals will be expected to seek sustainable solutions to the remediation of contaminated land.

Policy G4: Contaminated Land

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.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Ensure appropriate measures are undertaken to address long-term safety of the development in respect of land contamination.	- Discharge of condition(s) relating to verification of any remediation works as agreed with the Council.

Further Information

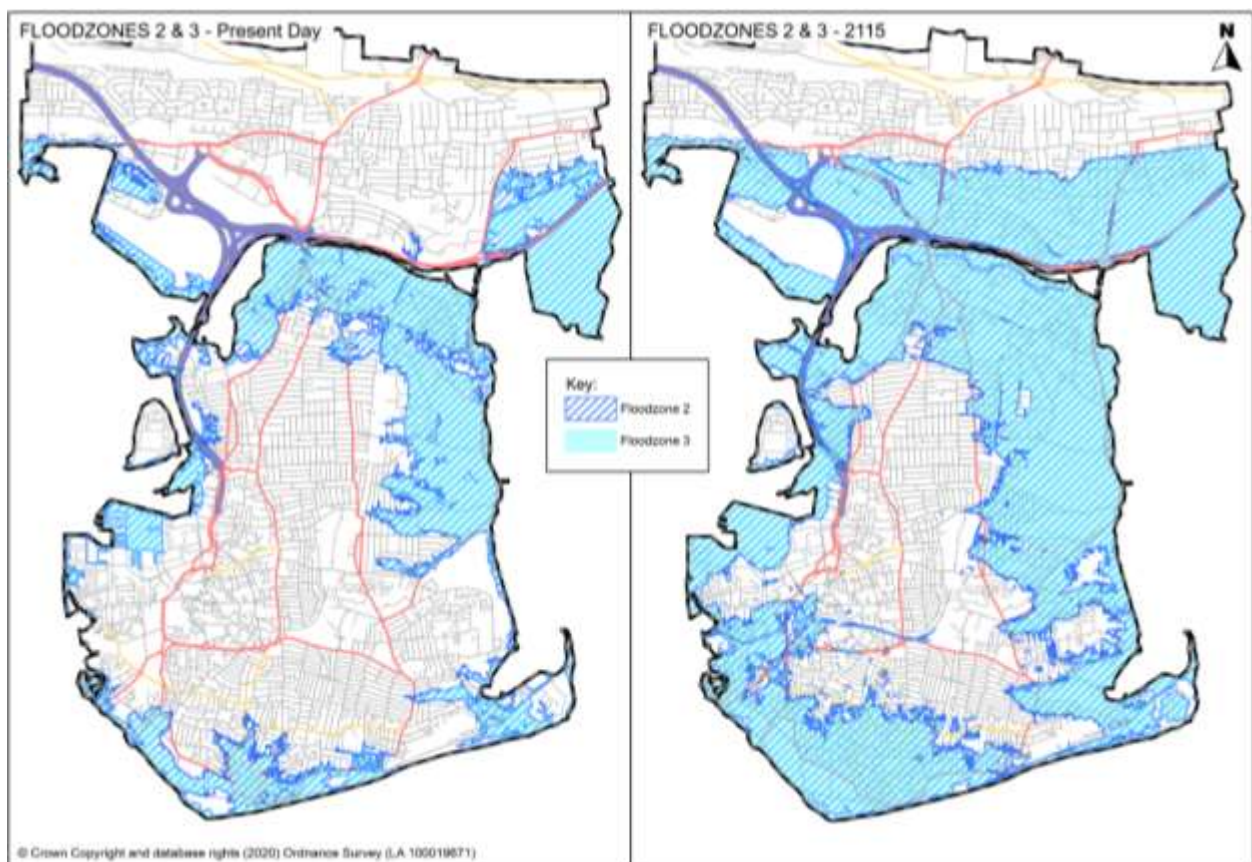
- PCC Contaminated Land Strategy: <https://www.portsmouth.gov.uk/ext/your-council/policies-and-strategies/contaminated-land>

Question 24: Contaminated Land

- a. Do you agree with the proposed approach to Policy G4?
- b. If not what changes would you suggest and why?

5.5 Flood risk and drainage (Policy G5)

Figure 22-Flood Maps, Present Day & 2115 (without flood defences)



- 5.5.1 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. There are also two Environment Agency designated main rivers within Portsmouth: Great Salterns Lake to the east of the island and Farlington Marshes on the mainland.
- 5.5.2 Flood risk is typically defined using the EA's flood risk zone system which indicates the predicted annual probability of flooding, from Flood Zone 1 (low risk) through to Flood Zone 3 (high risk). 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.

Why is this policy needed?

- 5.5.3 Portsmouth is home to thousands of people, businesses and properties. Significant investment is planned in order to protect existing development, accommodate future needs growth aspirations and meet the needs of the population.

- 5.5.4 National planning policy aims to ensure that flood risk is taken into account at all stages in the planning process, applying the sequential and exceptions tests where appropriate to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is necessary in such areas by exception, it will need to be made safe without increasing flood risk elsewhere and where possible reducing flood risk overall.

Flood risk in Portsmouth

- 5.5.5 The Environment Agency's data on flooding, and other available sources can give an estimate of the level and location of flood risk across the city, now and in the future (see Figure 22). The latest *UK Climate Change Projections* (UKCP) help to project the picture of flood risk forwards into the future so that we can understand how climate change impacts risk across the city.
- 5.5.6 Large areas of the city, particularly those adjacent to the coastline, fall into Flood Zones 2 and 3; areas that have the highest or medium probability of tidal flooding. Over the next 100 years, the extent of these flood zones are expected to expand. It is estimated that, if undefended, over 4,500 homes and over 450 commercial properties would be at risk from in the case of an 0.5% annual exceedance in the probability of flooding.
- 5.5.7 Tidal flood risk in Portsmouth is managed by the Coastal Partners⁹⁸, an allegiance formed to take a strategic approach to coastal management in the region⁹⁹. There is a significant on-going programme of works to ensure coastal defences will be resilient to long term coastal change and sea level rise, in-line with approach of the *North Solent Shoreline Management Plan* and the adopted strategies for Portsmouth coastline. See *Policy S10: Coastal Zone*.
- 5.5.8 There are also areas of the city also which have a high water table, making them susceptible to groundwater flooding events. Risks from such sources of flooding are managed by the Council's drainage team under its role as designated Lead Local Flood Authority (LLFA) under the *Flood and Water Management Act 2010*.
- 5.5.9 The risk from both tidal and groundwater flooding can also be expected to rise due to the predicted impacts of climate change.

Flood risk and the new Local Plan

- 5.5.10 The Council has undertaken an analysis of flood risk across the city, included an assessment of present day and future flood risk on the proposed strategic site allocations.

⁹⁸ Coastal Partners website: <https://coastalpartners.org.uk/authority/portsmouth/>

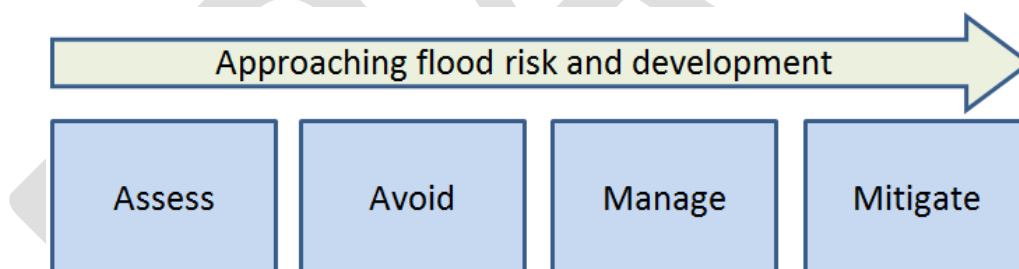
⁹⁹ Fareham Borough Council, Gosport Borough Council, Havant Borough Council and Portsmouth City Council authority areas.

- 5.5.11 Due to the constrained geography of Portsmouth and the prevalence of flood risk across the city it is not always possible to allocate development solely in areas of the lowest flood risk. Some new development will have to be located within areas that fall within areas of higher flood risk, where it can be demonstrated that development can be made safe for its lifetime.
- 5.5.12 The approach to flood risk in Portsmouth (set out in more detail in the Development and Tidal Flood Risk Position Statement) has been developed in partnership between Portsmouth City Council and the Environment Agency. The Council will continue to work with the Environment Agency to achieve the best possible outcomes for new development and flood risk in the city.

Flood risk and new development

- 5.5.13 It is expected that proposals avoid inappropriate development in flood risk areas and locate development away from flood risk whenever possible. The Council has a four-step approach to dealing with new development and tidal flood risk which has been guided by national policy (see Figure 23). The first step is to assess flood risks and then to avoid identified risk where possible. Where development does need to occur in areas of risk, risks should be managed and mitigated, to ensure that development is safe.

Figure 23-Four Step Development & Flood Risk Approach



- 5.5.14 New development needs to consider flood risk to the site itself, but also from the risk from the proposal to surrounding areas as early as possible, including displacement of water holding capacity. It needs to take account of climate change and the vulnerability of future uses to flood risk. Where necessary, developers need to undertake a site-specific flood risk assessment to assess flood risk on the site.
- 5.5.15 In addition to the EA flood mapping, the Partnership for South Hampshire (PfSH) have undertaken a *Strategic Flood Risk Assessment* (SFRA) for the south Hampshire region¹⁰⁰. 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

¹⁰⁰ PfSH Strategic Flood Risk Assessment information and mapping online at: <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/strategic-flood-risk-assessment/>

all forms of flood risk from tidal, river, groundwater, surface water and sewer sources, taking into account future climate change predictions for the next 100 years. A new SFRA for the sub region is currently being prepared to reflect most recent flood risk projections and the latest national climate change allowances; this new modelling is expected to be completed in early 2022 and will replace the existing assessment.

- 5.5.16 As a designated lead local flood authority, the Council has completed a Local *Flood Risk Management Strategy* (LFRMS) to recommend measures to manage and improve the flood risk of the city under the requirements of the *Flood and Water Management Act 2010*. The document is another source of information for understanding flood risk from all sources across the city and should be referred to in the preparation of proposals.
- 5.5.17 All proposals will need to demonstrate that they have applied the sequential approach and located development in areas of lowest flood risk possible, complying with the requirements of the Sequential and Exceptions Tests where necessary. On the proposed development site, the most vulnerable uses (such as residential development), should be located on areas that have the lowest flood risk, whilst lower vulnerability uses (such as car parking or open space) are positioned in the higher risk areas. 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 where they fall within a flood zone now or in the future.
- 5.5.18 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, whilst also ensuring that the development does not increase flood risk in other areas. Furthermore, 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, and should incorporate a range of measures to appropriately manage and mitigate residual risk.
- 5.5.19 The design of the development should try to minimise risk through the construction of the development and its surrounds (at site level) to avoid flooding (such as by raising the land above flood level). This will include ensuring safe access and egress routes for the lifetime of the development. Beyond this, where necessary, measures including flood resistance (e.g. dry proofing to prevent flooding from entering a building) and flood resilience (e.g. wet proofing to enable quicker re-occupancy) should be incorporated to further reduce the impacts of flooding. Proposals should also incorporate adequate flood warnings and evacuation plans if necessary (devised in accordance with guidance from the

appropriate emergency services) which will help to address any remaining residual flood risk for the occupants.

Drainage

- 5.5.20 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, could lead 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 into account day-to-day expected flow rates as well as risks from extreme weather events and future climate change.
- 5.5.21 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. Yet there are parts of the sewer system which are now in an aged condition with limited capacity to take on new demands.
- 5.5.22 Therefore, the Council expects new development to assess rates of surface runoff from new development and ensure that this is not increased as a result of the proposal. Net surface runoff should be actively reduced compared to pre-development levels. In order to promote efficient use of the foul sewerage system, and release capacity for foul water conveyance, surface water should be separated within the site.
- 5.5.23 New development should incorporate sustainable drainage systems designed to achieve greenfield run off rates in the first instance, though this will be influenced by the specific features of the site and its location. Applicants will need to demonstrate that proposals have been informed by a site-specific investigation, including infiltration tests and groundwater depth tests where appropriate, to determine the suitability of these features. *Water. People. Places: a guide for master planning sustainable drainage into developments*, commissioned by the South East Lead Local Flood Authorities, outlines the process for integrating sustainable drainage systems (SuDS) into the masterplanning of large and small developments.
- 5.5.24 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 sustainable drainage systems are intended to play a multi-functional role (e.g. delivering biodiversity benefits), this should not reduce their primary function for the lifetime of the development.
- 5.5.25 Early consultation with Southern Water is recommended during the design phase of the proposal regarding capacity for wastewater for the lifetime of the development.

- 5.5.26 The Council will continue to work with the relevant bodies including the Environment Agency, Coastal Partners and the water infrastructure providers in order to implement and maintain the appropriate flood defences, coast protection, drainage and sewerage infrastructure to the appropriate standards to meet the city's current needs and future, planned for growth.
- 5.5.27 Proposals should be informed by the Council's Local Flood Risk Management Strategy (LFRMS) and Surface Water Management Plan.

Policy G5: Flood risk and drainage

The Council will continue to follow the agreed approach to new development and flood risk with the Environment Agency, and as set out in national guidance, which is to assess, avoid, manage and mitigate flood risk.

New development and flood risk

The Council expects that proposals should address risk from all types of flooding and that proposals should follow the relevant flood risk management steps as set out in the NPPF and National Planning Practice Guidance.

Development will only be granted planning permission where:

- A sequential approach has been taken to locating the development and where the Sequential Test if required, and the Exception Test where necessary, as set out in national guidance, has been passed. The Sequential Test will be considered met on:
 - Allocated sites; and
 - Non-allocated brownfield sites in those parts of Flood Zones 2 and 3 that the Strategic Flood Risk Assessment shows as low or medium hazard areas.
- Proposals are accompanied by, and are in accordance with, a site-specific Flood Risk Assessment (FRA) as required and ensure that the most vulnerable uses are located in areas of lowest flood risk.
- Development, including access and egress, would be safe for inhabitants from flood risk for the lifetime of the development, taking account the latest available flood risk projections and climate change information, and will not result in flood risk being increased off-site.
- Appropriate flood avoidance, resilience and resistance measures for the specific requirements of the site have been incorporated into the design of the site, including where appropriate, flood warning and emergency evacuation plans (based on advice from the emergency services and in line with the Multi Agency Flood Plan).

Flood Risk Assessment will be required for proposals projected to be within Flood Zones 2 or 3 during the lifetime of the development.

Proposals including self-contained basement accommodation within a flood zone will not be permitted due to the unacceptable residual flood risks associated with this type of accommodation.

Drainage

Proposals must be designed so that development will not result in net increases in surface run off, and should achieve reductions in net surface run-off, compared to pre-development run-off rates of the existing site where possible.

Surface water will be required to be separated within the site, and the post development rate of discharge of both surface and foul water to the combined system should be no greater than the existing rate.

In advance of commencement, proposals will need to confirm that wastewater infrastructure can accommodate, or be improved to accommodate the proposals and that appropriate provisions have been made. Connection to the sewerage system should be made at the nearest point of adequate capacity, as advised by Southern Water.

Sustainable Drainage Systems should be incorporated into the proposal and achieve greenfield run-off rates, with appropriate operation and maintenance plans. Unless it can be demonstrated that Sustainable Drainage Systems would not be appropriate on-site.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Ensuring development in Portsmouth is resilient to flood risk.	• Number of planning applications permitted against Environment Agency advice.

Further Information

- Portchester to Emsworth Management Strategy (PEMS)
- Portsea Island Coastal Strategy Study (PICSS)
- PUSH Strategic Flood Risk Assessment (SFRA)
- Portsmouth Surface Water Management Plan
- Local Flood Risk Management Strategy (LFRMS)
- PCC (2021) Development and Tidal Flood Risk background paper
- Water. People. Places. - A guide for master planning sustainable drainage into developments
- Shoreline Management Plan

Question 25: Flooding and Drainage

- Do you agree with the proposed approach to Policy G5?
- If not what changes would you suggest and why?

6 - Sustainable Design & Heritage

6.1 Design (Policy D1)

- 6.1.1 The character of Portsmouth is predominantly influenced by its built environment; with its individual buildings and structures, streets, and urban areas. Over time, Portsmouth has been shaped and characterised by its history, from its maritime beginnings through to its post-war revival.
- 6.1.2 Portsmouth should continue to recognise its unique maritime heritage and characteristics, whilst looking ahead to establish itself as a city renowned for its high quality architectural and urban design, to be a place that is desirable for people to live, work, and visit.

Why is this policy needed?

- 6.1.3 Well-designed environments and development create better places in which to live, work, and visit, and a 'sense of place' for its users.
- 6.1.4 The *National Planning Policy Framework* requires that Local Plans set out a clear design vision, reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics, as well as a positive strategy for the conservation and enjoyment of the historic environment.
- 6.1.5 Early engagement and consultation with the community on new development is central to achieving high design quality and shaping the future of the city.

The importance of design for the city

- 6.1.6 The city benefits from well-designed and successful buildings and places at a range of scales - however, there is always scope for improvement. When poorly considered, the design of all development (from individual details on buildings up to masterplans for major sites) has the capacity to erode the quality of the built environment. In this context, achieving visually attractive high-quality outcomes is fundamental to the planning process, and this is an ongoing priority of the council for the city.

Pre-application engagement

- 6.1.7 Design must be considered throughout the evolution and assessment of development proposals. Early engagement between applicants and the council is particularly important in understanding and clarifying expectations and reconciling different interests in the design development process. In light of this, early engagement between applicants with the council through formal pre-application discussions is strongly encouraged.

- 6.1.8 Where appropriate, applicants are expected to engage and work with those affected by development and the wider local community in order for them to respond to and evolve the design of schemes.

Design review and other tools

- 6.1.9 The Council has access to design review panels at a local, sub-regional, and wider level. Where it is considered appropriate, use will be made of these and regard had to design review panel recommendations when assessing proposals.
- 6.1.10 Where required, comprehensive *Design and Access Statements* will be expected as part of a pre-application or planning application submission, and any design rationale/ justification scrutinised to aid in the assessment process. Other assessment tools and processes, including (but not necessarily limited to) design workshops, design guidance/ codes, and assessment frameworks may also be utilised where appropriate.

DRAFT DEVELOPMENT MANAGEMENT POLICY D1: DESIGN

- 6.1.11 Large-scale major developments should be supported by detailed masterplans or development frameworks and, where appropriate, design codes. Such tools and documents are expected to be produced in collaboration and consultation with the community.
- 6.1.12 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.

Development Management Policy D1: Design

The Council will seek and promote an excellent standard and quality of design for all development in the city.

To achieve an excellent quality design, development should:

1. Be of excellent architectural and/or urban design quality. Proposals must respond creatively to and enhance the application site and its context, and/or any affected heritage asset and its setting.
2. Be a positive, beautiful, respectful, and sympathetic design response in relation to the host building/ site, surrounding area, wider city, and/ or the significance of

designated and non-designated heritage assets, by taking into consideration the following (but not necessarily limited to):

- a. (i) Appearance, (ii) height, (iii) massing, (iv) bulk, (v) scale, (vi) form (vii) setting, and (viii) density.
- b. (i) Floorplan, (ii) layout, (iii) siting, (iv) alignment, and (v) orientation.
- c. Materials, and their (i) quality, (ii) sustainability, (iii) durability, (iv) colour, (v) size, (vi) texture, (vii) finish, and (viii) method/ rhythm/ pattern of bonding or laying.
- d. Fenestration, including the (i) size, (ii) number, (iii) alignment, (iv) rhythm, (v) scale, (vi) proportion, and (vii) detailed design of windows, doors, roof lights, and any other openings.
- e. Architectural and historic appropriateness, style, detailing, and ornamentation.
- f. (i) Rhythm of surrounding buildings' (ii) building line, (iii) roof/eaves line, and (iv) pitch.
- g. (i) Streetscape, (ii) townscape, (iii) roofscape, and (iv) skyline.
- h. Existing and/or new hard and soft landscaping including walls, fences and railings and other boundary treatments or means of enclosure, trees, planting, and the natural environment.
- i. High quality public and private space that is attractive, clearly defined, durable, accessible, and safe.
- j. Taking into careful consideration of existing buildings or townscapes of value that generate new views and/or enhances the setting of heritage assets.
- k. Including public art where appropriate, particularly in prominent locations.
- l. Where provided, cycle storage and car parking that is well integrated, well designed, and secure.
- m. Reducing or eliminating opportunities for crime through design, layout, and other features.
- n. Providing appropriate levels of accessibility for all users.
- o. Mitigating impacts of climate change and micro-climates, including wind speeds at ground level, glare, overshadowing, and heat island effects.
- p. Including outstanding or exceptionally innovative design and architectural solutions wherever possible.

Where required, comprehensive *Design and Access Statements* will be expected as part of a planning application submission. Proposals relating to designated and non-designated heritage assets and their settings must be supported by a *Heritage Statement*. Other assessment tools and processes, including (but not necessarily

limited to) design workshops, design guidance/ codes and assessment frameworks, may also be utilised where appropriate.

Policy Monitoring	
Policy Aim	Key Indicator(s)
➤ To achieve the high quality of design standards in development across the city	- Number of applications refused on design grounds

Further Information:

- MHCLG (Oct 2019) *National Design Guide*
- MHCLG (Feb 2021) draft *National Model Design Code* (consultation proposals)
- Achieving well-designed places through neighbourhood planning:
<https://neighbourhoodplanning.org/toolkits-and-guidance/good-design-neighbourhood-planning/>

Question 26: Design

- a. Do you agree with the proposed approach to Policy D1?
- b. If not what changes would you suggest and why?

6.2 Sustainable design and construction (Policy D2)

- 6.2.1 The way that new development (such as homes, offices and roads) are designed and constructed can have an impact upon the wider environment, as well as the physical and mental health of the people that live in these spaces. Sustainable design and construction is concerned with implementing sustainable development at the scale of individual sites and buildings. It takes account of the environmental, social and economic impacts (including health and well-being) of how buildings are designed and used, as well as the construction process itself.
- 6.2.2 Sustainable design and construction practices seek to minimise the use of resources (including energy and water); ensure that the built environment is resilient to the impact of climate change; protects and enhances biodiversity and green infrastructure; and ensure the sustainable sourcing of materials and minimises waste. This includes reducing the embodied carbon within construction processes which are important to mitigating climate change.

Why is this policy needed?

- 6.2.3 In addition to the Council's responsibilities to reduce emissions under the *Climate Change Act 2008* (as amended) and its own *Climate Emergency Declaration*, the national policy requires Local Plans to contribute to the prudent use of natural resources and minimise waste and pollution, as well as mitigating and adapting to climate change. Portsmouth could be at increased risk from the impacts of climate change from the 'Urban Heat Island' effect and coastal flooding and erosion from sea level rise.

Sustainability in the design and construction process

- 6.2.4 The construction process can utilise a wide range of natural resources in the production of building materials. Once a building has been constructed, it is far more costly and resource intensive to retrofit more efficient and resilient design measures. As such, consideration of how a building can be designed and constructed to help achieve the highest levels of environmental performance should be considered from the outset of the development process.
- 6.2.5 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.

Sustainable Design and Construction Assessment Frameworks

- 6.2.6 One means of demonstrating the sustainability of a development, is through certification against a recognised independent assessment framework, such as the *Building Research Establishment's Environmental Assessment Method* (BREEAM), which includes a range of assessment and certification for different stages in the built environment life cycle, from design and construction through to operation and refurbishment. BREEAM is an internationally recognised scheme that results in a rating that reflects the sustainability performance of a development, community or infrastructure project. BREEAM ratings range from Acceptable (in-use schemes only) to Pass, Good, Very Good, Excellent to Outstanding. The *Homes Quality Mark* (HQM) for new residential development is also part of the wider BREEAM framework; it uses a star rating from 1 (meets key baselines beyond minimum standards) to 5 (outstanding).

Health and Well-being

- 6.2.7 The quality of the built environment is one of the primary factors influencing the wider determinants of people's physical and mental health. Poorly designed development can exacerbate negative health and wellbeing. There are some notable health inequalities across the city and number of areas in which the health outcomes for residents are poorer than the national average. This currently includes excess weight in adults and children, male and female life expectancy from birth, premature deaths from cardiovascular disease and cancers, smoking prevalence in adults and smoking related deaths, as well as the numbers killed and seriously injured on roads.
- 6.2.8 Well-designed development can help to protect health and well-being and create opportunities for improved health outcomes. For instance: the incorporation of quality amenity, communal spaces provide opportunities for connecting with others and enabling social support, 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, as well as reduce impacts on air quality arising from vehicle emissions. While spaces for play and recreation provide options for all ages to stay active, reducing risks of obesity which is linked to cardiovascular disease and many other illnesses.
- 6.2.9 It is therefore crucial that the design of new development takes into account health and well-being at an early stage (including air quality issues). The expectation will be that proposals demonstrate how negative impacts on health have been minimised whilst opportunities for protecting and improving people's health and well-being have been maximised as part of any application.
- 6.2.10 The Council encourages all proposals to integrate health and well-being considerations at all stages of the development process. Major development will need to be accompanied by a Health Impact Assessment, proportionate to the

size and scale of the development. The HIA will need to be informed by: the most up to date evidence for health and well-being in the city; clearly address how the development has considered health inequalities and the wider determinants of health in the development of the proposal; and demonstrate how the development has been informed by, and responds to, key health and well-being issues. The Council is currently preparing further guidance relating to HIA requirements for development proposals.

- 6.2.11 The Council will continue to work with health providers and other partners to ensure appropriate health and care infrastructure needs and specialist housing needs can be met in a timely manner to support new development. See *Policy C2: Infrastructure and Community Benefits*

Climate change adaption and the risks of overheating

- 6.2.12 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 (UHI) 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 UHI effect on the city.
- 6.2.13 In Portsmouth, as found nationally, 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.
- 6.2.14 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 a *Cooling Strategy*, ideally as part of the *Energy and Climate Statement (See Policy D4: Lower Carbon and Carbon Neutral Development)*. The *Cooling Strategy* 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 *Cooling Strategy* 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.

6.2.15 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 (see also *Policy D4: Lower Carbon and Carbon Neutral Development*).

6.2.16 However, the Government is consulted on addressing the issue of overheating in new buildings as part of the *Future Buildings Standard* consultation (April 2021) and proposes to standardize such requirements across England through amendments to Building Regulations.

Water Resources and Water Quality

6.2.17 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 South East region, which is identified as an area serious water stress. Reducing water use also contributes towards other sustainability objectives, such as reducing the carbon footprint of homes (because there is less water to heat for example).

6.2.18 Methods of minimising water use, including the reuse of rain water and grey water, should therefore be considered within the design of proposals.

6.2.19 There is evidence that nitrogen run-off into the water environment in the Solent is causing eutrophication¹⁰¹ at designated habitat sites. A long term strategy to address the nutrient enrichment issue across the Solent catchment is being developed by the affected Local Planning Authorities in conjunction with the relevant agencies and stakeholders. In the interim, applicants will need to demonstrate and secure 'nutrient neutrality' for their proposals in perpetuity. See *Policy G3: Water Quality* (nutrient neutrality).

¹⁰¹ The process by which excessive nutrients in water bodies lead to algal blooms and low-oxygen waters.

- 6.2.20 In general, deterioration of water quality, during construction and the use/ operation of the building must be avoided. Water pollution, and all other forms of pollution are also addressed by *Policy D3: Pollution, Health and Amenity*.

Resource Use and Minimising Waste

- 6.2.21 The goods and products we use every day contain raw materials and energy from minerals. Minerals are finite natural resources which need to be used sustainably. The final disposal of such as products as 'waste' is a lost opportunity for resource re-use. The extraction and processing of materials, including minerals, as well as their transportation, assembly and eventual disassembly also have embodied carbon emissions (and other greenhouse gases) which contribute to climate change.
- 6.2.22 The *Hampshire Minerals and Waste Plan* (2013), in-line with national planning policy, is based upon the principles of encouraging the reduction, beneficial re-use or recycling of wastes and the use of substitute or secondary and recycled minerals to lessen the need for extraction of primary mineral resources from the land or sea.
- 6.2.23 Sustainable design and construction practices should therefore strive to make the most efficient use of natural resources (and their transportation) 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.

Biodiversity

- 6.2.24 To protect and enhance the natural environment, wildlife friendly construction practices should be utilised where possible. Development will be expected to create net gains in biodiversity (*Policy G1: Biodiversity*) and take account of local ecological and green and blue infrastructure networks (*Policy G2: Green Infrastructure*).

DRAFT DEVELOPMENT MANAGEMENT POLICY D2: SUSTAINABLE DESIGN AND CONSTRUCTION

- 6.2.25 Development proposals will need to demonstrate sustainability by achieving certification against an independently assessed Sustainable Design and Construction Assessment Framework such as Homes Quality Mark (HQM), BREEAM, or an equivalent scheme where agreed with the Council. The highest possible standards of sustainable design and construction are expected. Early pre-application discussions are strongly encouraged. Account may be taken of

technical feasibility, site specifics, economic viability and other requirements associated with the development.

- 6.2.26 Applicants are encouraged to address as many of the aspects of sustainable design and construction as possible, particularly the issues highlighted on this chapter (e.g. adaption rising temperatures and water resource management) within the layout, design, construction and use/ operation of the development and its impacts. Also see *Policy D3: Lower Carbon and Carbon Neutral Development*.
- 6.2.27 The Council will require evidence of the certification prior to commencement. A design stage certificate will need to be submitted with the application, accompanied by a covering letter from the registered assessor. Evidence of the 'as built' certification score may also be sought post-construction.
- 6.2.28 All development should integrate health and well-being considerations into all stages of the development process.

Policy D2: Sustainable Design and Construction

Development, including conversions, extensions and changes of use, must be designed to achieve the highest possible level of sustainability in their design, construction and operation.

Demonstrating sustainability

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. The following is expected as a minimum, as agreed with the Council:

- *New residential development* - a 3 star rating under the Homes Quality Mark certification scheme.
- *New residential development of 100 dwellings or more* (gross) - Excellent under the BREEAM Communities scheme.
- *Non-residential development* - BREEAM 'Pass' for proposals of less than 500 sq m; BREEAM 'Very Good' for proposals of 500 to 999 sq metres; and BREEAM 'Excellent' for development proposals of more than 1000 sq metres (gross floorspace).
- *Conversions and change of use* - 'Very Good' under the BREEAM Refurbishment and Fit Out standard.
- *Infrastructure proposals and public realm projects* - appropriate assessment against the Civil Engineering Environmental Quality Assessment and Awards Scheme (CEEQUAL), or an equivalent scheme.

Addressing rising temperatures and overheating

Proposals should be accompanied by a Cooling Strategy, as part of the Climate and Energy Statement, proportionate to the size and scale of the development, which includes details of how risks from overheating and heat stress for inhabitants would be addressed for the lifetime of the development.

Conserving and using water efficiently

Proposals will be expected to reduce water consumption and incorporate measures for re-use where appropriate. New residential development, including conversions and changes of use, are required to achieve water efficiency standards of no more than 110 litres per person per day.

Policy Monitoring	
Policy Aim	Key Indicator
➤ Improving sustainability of new development in the city.	<ul style="list-style-type: none"> - Applications granted planning permission with a certified sustainability assessment; and the number of permitted schemes achieving the required level of certification. - Planning applications refused in accordance with this policy.
➤ Reducing the risks from overheating and the impacts of the Urban Heat Island effect	<ul style="list-style-type: none"> - Applications granted planning permission with a Cooling Strategy
➤ To ensure development takes account of health and well-being considerations and major development is accompanied by a Health Impact Assessment (HIA).	<ul style="list-style-type: none"> - Number of major applications accompanied by a HIA

Further Information:

- PCC (2021) *Adapting and Mitigating Climate Change background papers*
- PfSH (2020) *Integrated Water Management Study Update*
- UKCP09/18 climate projections
- *Portsmouth Joint Strategic Needs Assessment*
<https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment>
- *Portsmouth Health and Wellbeing Strategy 2018-2021*
<https://www.portsmouth.gov.uk/ext/the-council/transparency/health-and-wellbeing-strategy>

Question 27. Sustainable Design and Construction

- a. Do you agree with the proposed approach to Policy D2?
- b. If not what changes would you suggest and why?

6.3 Pollution, Health and Amenity (Policy D3)

- 6.3.1 The quality of the built environment is one of the primary factors that can influence the wider determinants of physical and mental health. The location, siting, and design of development, as well as its construction, have the potential to influence the health and amenity of occupants and users, as well as the local community and the wider environment.
- 6.3.2 Poor air quality is the largest environmental risk to public health in the UK, as found here in Portsmouth. Studies have shown that long-term exposure to air pollution reduces life expectancy and worsens conditions such as respiratory and cardiovascular diseases. There are notable health inequalities across the city and health outcomes for residents that are worse than the national average; currently this includes excess weight in adults and children, male and female life expectancy from birth, premature deaths from cardiovascular disease and cancers, smoking prevalence in adults and smoking related deaths, as well as the numbers killed and seriously injured on roads.

Why is this policy needed?

- 6.3.3 National planning policy is clear that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction and address identified local health and well-being needs. The social, environmental and economic causes of ill-health are complex and numerous, and those affected by health inequalities are also often affected by other, wider forms of inequality. Creating a healthy city, with reduced health inequalities, will help to improve the health and wellbeing of those most in need, whilst helping to ensure the city grows sustainably for all.
- 6.3.4 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 response, the Council has prepared a Local Air Quality Plan, working closely with Government's Joint Air Quality Unit (JAQU), to achieve compliance with legal limits for nitrogen oxide (NO₂) in the shortest possible time.
- 6.3.5 National planning policy also requires that new development is able to be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') would be required to provide suitable mitigation before the development has been completed.

Health and Air Pollution in Portsmouth

- 6.3.6 In Portsmouth, one of the main pollutants which can impact on human health are the products of combustion from road traffic – mainly nitrogen dioxide. The impacts of air pollution are not felt equally, with those living in the most deprived communities at greatest risk of exposure to air pollution (due to proximity to congested roads and other pollution sources) and associated poor health outcomes.
- 6.3.7 The outcome of the recent Coroner's Inquest concerning the death of Ella Kissi-Debrah (December 2020) found that exposure to air pollution was a significant contributory factor in her death, following acute respiratory failure from severe asthma. Evidence presented at the inquest concluded that there is no safe level for Particulate Matter and that air pollution is a public health risk regardless of legal threshold limits. Nevertheless, it was recommended that, alongside greater awareness and provision of information on air quality, the legally binding use of World Health Organisation's (WHO) targets should be the minimum requirement, instead of current assessment standards based on the higher EU/ UK limit values. It is likely that the recommendations of the Inquest will be reflected in the upcoming *Environment Act*.
- 6.3.8 Portsmouth City Council has an on-going duty to review and assess air quality, and has declared five Air Quality Management Areas (AQMAs) where levels are predicted to exceed the annual nitrogen dioxide (the pollutant particularly associated with road traffic emissions) under the National Air Quality Objective (NAQO). As part of the *Local Air Quality Plan* submitted to Government, the Council has been directed to implement a Class B charging Clean Air Zone focused on the area with the highest concentration of air pollution around the city centre. The Charging Zone will be operational from late 2021 and will change the most polluting vehicles for driving through in the zone¹⁰².

Addressing Health and Well-being through Design

- 6.3.9 Well-designed development can help to support health and well-being and create opportunities for improved health outcomes. For instance: the incorporation of quality 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. While spaces for play and recreation provide options for all ages to stay active, reducing risks of obesity which is linked to cardiovascular disease and many other illnesses.

¹⁰² There are a number of exemptions from the Clean Air Charing Zone, see: <https://travel.portsmouth.gov.uk/schemes/charging-clean-air-zone/>

- 6.3.10 It is crucial that the design of new development takes into account health and well-being 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 well-being have been fully considered.
- 6.3.11 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 the both existing and potential future conditions.
- 6.3.12 The Council expects all proposals to integrate health and well-being 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. The HIA must be informed by the most up to date evidence for health and well-being 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 well-being issues.
- 6.3.13 The Council is currently preparing further guidance relating to HIA requirements for development proposals.

Air quality

- 6.3.14 All proposals need to take into account compliance with relevant limit values or national objectives for pollutants. It is proposed that new development complies with the World Health Organisation's (WHO) targets on air quality; in view of the recognized air quality issues in the city and the ahead of the likely inclusion of this requirement in the forthcoming Environment Act.
- 6.3.15 Proposal 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 affect the implementation of Portsmouth's *Local Air Quality Action Plan*, *Air Quality Management Areas* and the *Clean Air Zone(s)*, as well as the potential for cumulative impacts. Opportunities to improve air quality or mitigate impacts should be maximised (such as traffic and travel management or green infrastructure provision and enhancement).
- 6.3.16 Air Quality Impact Assessments 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 guidance¹⁰³. It is advised that agreement on the approach to AQA be sought with the Council at the earliest opportunity

- 6.3.17 Updated Supplementary Planning Guidance on air pollution may be prepared in due course to assist applicants.

Other forms of pollution and amenity impacts

- 6.3.18 Proposals must take account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to:
- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and the quality of life;
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

DRAFT DEVELOPMENT MANAGEMENT POLICY D3: POLLUTION, HEALTH & AMENITY

- 6.3.19 Policy D3 will ensure that consideration of all aspects of health and well-being are integrated into the design and construction all proposals from the outset.
- 6.3.20 All new development should address the potential for adverse impacts from air pollution and all other forms of pollution on the health and amenity of current and future residents, site users and surrounding occupiers to ensure they are provided with an acceptable living environment and a high standard of amenity.

Policy D3: Pollution, Health and Amenity

Assessing health impacts of new development

Development proposals should demonstrate how health inequalities and the wider determinants of health and well-being 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 Portsmouth's residents.

¹⁰³ National planning guidance on air quality: <https://www.gov.uk/guidance/air-quality--3#what-is-the-role-of-plan-making-with-regard-to-air-quality>

Major development proposals will be required to undertake an accompanying Health Impact Assessment (HIA), demonstrating how the planning application has been informed by the findings of the assessment

Air Quality

Planning permission will only be granted where it can be demonstrated that proposals have fully considered and adequately mitigated the potential for poor air quality impact on both the proposed location as well as the future occupants/ users of the development, in-line with the relevant requirements and considerations.

Pollution

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, in relation to the following factors:

- a. Air quality/ odour/ dust
- b. Noise
- c. Vibration
- d. Light
- e. Water (including leachate)
- f. Any other forms of pollution

Amenity

Planning permission will be granted where it can be demonstrated that development will, whether avoid, minimise, or where necessary mitigate, adverse (direct or cumulative) impacts in relation to the following factors:

- a. Outlook/ aspect
- b. Sense of enclosure
- c. Privacy/ overlooking
- d. Daylight/ sunlight
- e. Glare
- f. Micro-climatic effects

Development proposals must demonstrate that future occupiers/ users will not be unacceptably adversely impacted by existing activities and uses in the surrounding area.

Development which gives rise to unacceptable adverse impacts in relation to the amenity of future occupiers/users or on adjacent or nearby occupiers/ users will not be supported.

Policy Monitoring	
Policy Aim	Key Indicator(s)
➤ To ensure a high standard of amenity for existing uses and future users/ occupiers.	- Applications refused in accordance with this policy.

Further Information:

- *Portsmouth Joint Strategic Needs Assessment*
<https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment>
- *Portsmouth Health and Wellbeing Strategy 2018-2021*
<https://www.portsmouth.gov.uk/ext/the-council/transparency/health-and-wellbeing-strategy>

Question 28. Pollution, Health and Amenity

- a. Do you agree with the proposed approach to Policy D3?
- b. If not what changes would you suggest and why?

DRAFT

6.4 Lower carbon and carbon neutral development (Policy D4)

6.4.1 Carbon neutrality, or net zero carbon emission, seeks to achieve (net) zero emissions of greenhouse gases (such as carbon dioxide, a significant contributor to climate change) by avoiding, reducing or 'offsetting' emissions to ensure there is no net increase in carbon emissions into the atmosphere. A net zero carbon or 'carbon neutral' building for instance, would be a highly energy efficient building with all remaining energy needs generated from 'clean' or renewable sources.

Why is this policy needed?

6.4.2 The UK has made commitments to mitigating global climate change under the *Climate Change Act 2008 (as amended)* to bring all greenhouse gas emissions to net zero by 2050. The Council therefore has a legal obligation to help contribute to achieving these aims; a responsibility that has been recognised by the declaration of a Climate Emergency in 2019 and the pledge to become a carbon neutral city by 2030. The national planning policy guidance is also clear that local authorities need to plan proactively to support the transition to a low carbon future and mitigate climate change through their Local Plans.

6.4.3 One of the principal areas to address is the carbon dioxide emissions from new development; the existing built environment produces more than 60% of all emissions in Portsmouth annually. Ensuring the energy use of new development is as close to carbon neutral as possible will be crucial in addressing climate change and improving local air quality, as well as ensuring the Local Plan supports the transition to a low and ultimately zero carbon future.

6.4.4 However, the ability for Local Plans to set bespoke, higher energy standards for new development may be superseded by changes to Building Regulations, in order to ensure a more consistent approach across England to the Government's net zero carbon commitments. The *Future Buildings Standard* consultation (which ran until April 2021), included proposals for addressing standards in non-residential buildings, including carbon reductions. Recently implemented changes to Building Regulations¹⁰⁴ also now require that all new buildings are to be 'nearly zero-energy', although this demands no higher standard than the pre-existing Building Regulations. As such, the draft approach to requiring low and zero carbon development for the new Local Plan may be amended or could be superseded by further changes to Building Regulations in due course.

New Development and the Energy Hierarchy

6.4.5 All new development should be designed so that it can function within a net zero carbon emissions future. This means that even where a development is unable to mitigate all carbon emissions at present, its design does not substantially preclude

¹⁰⁴ Reg 25b of the *Building Regulations 2010 (as amended)* which came into force on 31 December 2020.

it from achieving carbon neutrality in the future, as technology improves. For instance, buildings with high fabric efficiency standards will be more adaptable to future upgrades, allowing the installation of cleaner heat sources in in future" (e.g. air source heat pumps). Alternatively, developments could include a communal heating system that has the potential to linked up to wider district heating systems in the future (an example of being 'connection ready').

6.4.6 To move towards a net zero carbon future, it will be important that all proposals demonstrate an approach to design in accordance with the priorities set out in the energy hierarchy, focusing on the highest levels (1 being the highest) so far as possible. The energy hierarchy has four levels:

1. Reduce the use of energy (through measures such as fabric efficiencies);
2. Use energy more efficiently (meeting heating/ cooling needs sustainably);
3. Move to energy from renewable sources (incorporating on site renewable energy systems); and
4. Use remaining fossil fuels cleanly.

Reducing the use of energy

6.4.7 It is expected that all proposals take a 'fabric first' approach to energy efficiency and are designed to minimise the energy that is used by occupants through a variety of design measures. Proposals strive to include energy efficient building materials, orientate buildings to maximise use of winter solar gain (whilst being mindful of the risk of overheating in summer), as well as incorporate passive design features such as those reflected in the Passivhaus Standard wherever possible.

6.4.8 While the energy hierarchy principles do allow some flexibility in how carbon neutrality is achieved, all development will be expected to achieve a level of carbon reduction beyond the minimum standard set by national building regulations, of at least a 19% improvement over the Target Emissions Rates (TERs)¹⁰⁵. Though proposals should also seek to reduce emissions further where this is possible. This could be evidenced through the submission of the most appropriate worksheets utilising the relevant energy efficiency calculations, such as Standard Assessment Procedure (SAP) for residential, or a Simplified Building Energy Model (SBEM) for other buildings for instance. Where national policy or Building Regulations are subsequently updated, any equivalent replacement minimum requirements should be achieved instead.

¹⁰⁵ Building Regulations Approved Document Part L 2013

Using energy more efficiently

Sustainable heating and cooling

- 6.4.9 Sustainable heating and cooling systems can be powered by renewable sources (e.g. solar thermal technology, air and ground source heat pumps).
- 6.4.10 Greater cooling efficiencies will be increasingly important for adapting to the impacts of climate change, to address the predicted warmer average temperatures and higher occurrences of heat waves. For information on Cooling Strategies see *Policy D2: Sustainable Design and Construction*.
- 6.4.11 Fossil fuel generated CHP/ CCHP systems should have the potential to be adapted to accommodate renewable fuels in future, particularly hydrogen, where this is unfeasible at present.

District/ Communal Heat (major development)

- 6.4.12 Opportunities for district and communal heat networks, where heat is supplied at scale to a larger number of domestic and non-domestic units from a central heat source, should be explored for major development schemes where possible. Heat can be sourced from an energy centre and can incorporate low carbon heating sources, as well as being able to take advantage of large scale waste heat from industrial processes such as energy-from-waste plants, water bodies or other infrastructure. Where it is not possible for schemes to be zero carbon at present, proposals should ensure that CHP infrastructure is capable of being decarbonised over time.
- 6.4.13 Major development proposals should show that they have explored opportunities for district/communal heat systems, particularly in locations where there are existing networks that can be connected into, or where such networks can be reasonably expected in the future.
- 6.4.14 Schemes of more than 250 dwellings should be supported by their own district/communal heat network, unless it can be demonstrated that this would be unfeasible, or that heat and power can be sourced in a more sustainable way. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.
- 6.4.15 It is envisioned that regeneration in the city centre area and Tipner could present opportunities for development of district heat networks. Discussions with the Council regarding opportunities for district/communal heat systems, as well as connections to existing or potential networks, are encouraged at an early stage.

Renewable energy

- 6.4.16 Whilst opportunities for large scale renewable energy technologies may be limited in Portsmouth due to space constraints, small-scale renewable technology (sometimes referred to as micro-renewables) such as micro-wind turbines (free

standing or mounted on buildings), solar thermal or solar photovoltaics may have potential where they can be appropriately incorporated into new development. Such technologies could take advantage of underutilised spaces such as walls and rooftops.

- 6.4.17 Solar panels on a new development should be designed appropriately to ensure that their energy generating potential is maximised. For instance, panels should be oriented on south facing rooftops out of shade (including overshadowing from other buildings) wherever possible, in order to maximise exposure to sunlight. The use of such technologies will also need to be sensitive to local environment (including biodiversity) and Portsmouth's heritage/ conservation assets.
- 6.4.18 All proposals are encouraged to explore the use of small scale renewable energy technologies. For major developments, at least 20% of energy requirements should be met by the provision of on-site renewable energy.

Addressing Residual Carbon Emissions (major development)

- 6.4.19 Once the carbon emissions of a proposal have been reduced as much as possible, through the upper levels of energy hierarchy as set out above, it is proposed that any remaining 'un-mitigated' or residual, from major developments should be offset via a single financial contribution to a 'Carbon Offset Fund' managed by the Council, subject to viability. This Fund would provide off-setting through investment and delivery of carbon mitigation projects elsewhere within the city (such as fabric efficiency improvements on older housing stock or installing solar panels for example).
- 6.4.20 Financial contributions for residual carbon emissions would be per tonne for an agreed period, until the national energy grid is likely to be fully decarbonised (current estimation is 2035). Research suggests that to make any carbon offsetting scheme viable, a contribution of £95 *per tonne*¹⁰⁶ of the residual carbon emissions would be required. Further guidance and a charging schedule would need to be produced to assist applicants.

DRAFT DEVELOPMENT MANAGEMENT POLICY D4: LOWER CARBON AND CARBON NEUTRAL DEVELOPMENT

- 6.4.21 All proposals should demonstrate an approach to design in accordance with the priorities set out in the energy hierarchy, and meet the requirements of *Policy D2: Sustainable Design and Construction* as applicable.

¹⁰⁶To be index linked annually.

- 6.4.22 An *Energy and Climate Statement* will need to be submitted with all planning applications, detailing how compliance with the requirements of Policy D4 have been achieved, including the following where applicable:
- How the design of development has been approached in accordance with the energy hierarchy; including information on fabric efficiencies, sustainable heating and cooling systems and any modelling information.
 - How measures will be incorporated to ensure the development can efficiently function in a net zero carbon future.
 - Projections of carbon emission reductions to be achieved by renewable energy usage (major development proposals only)
 - A calculation of the proposal's carbon footprint and including the residual, regulated emissions requiring offsetting (major development proposals only)
- 6.4.23 Proposals that do not meet the required principles will need to provide appropriate evidence in support of the application, such as a viability assessment.

Policy D4: Low Carbon and Carbon Neutral Development

The design and construction of development (including conversions, extensions and changes of use), must be optimised to emit the lowest levels of carbon emissions. This is expected to be primarily through incorporating a range of low and zero carbon design approaches, in-line with the energy hierarchy, and which satisfactorily demonstrate adaptability for a net zero carbon emissions future.

A *Climate and Energy Statement*, proportionate to the size of the development, will be required to demonstrate how all requirements have been met through the design of the development.

Fabric efficiency:

Development will be expected to be energy efficient and proposals will need to demonstrate a fabric first approach, utilising a variety of design features to minimise energy demand for heating, lighting and cooling.

New development will be required to achieve a 19% improvement upon the TER requirements within *Building Regulations Approved Document Part L 2013* (or equivalent replacement) and/ or meet the requirements of *Building Regulations 2010 Reg 25b* (as amended) as appropriate.

Renewable energy:

All major development must achieve a further 20% reduction in remaining carbon emissions through renewable or low carbon energy generation technologies on-site, where practicable and viable.

Heating and cooling:

All proposals must investigate opportunities to incorporate renewable and low carbon heating and cooling systems (either individual or communal) and incorporate the following where applicable:

- Major development up to 250 dwellings, or non-domestic uses of more than 500 sq metres, will need to demonstrate that they have explored opportunities for communal/ district heating schemes, including connecting into existing local networks, or creating new ones where appropriate and sustainable. Proposals of more than 250 dwellings, or of more than 1,000 sq metres for non-domestic uses, will be expected to be supported by their own district/ communal heat network where feasible, or a suitable alternative.
- Major development in potential strategic locations for heat networks should be designed to be 'connection ready' and capable of connecting into that network.

Carbon offsetting:

On major developments, where there are residual, regulated carbon emissions, proposals will be required to make a financial contribution into the Council's proposed Carbon Offset Fund.

Policy Monitoring	
Policy Aim	Key Indicator
➤ To mitigate climate change by securing reductions in carbon emissions across the city through reducing emissions.	- Data on carbon emissions
➤ To offset residual carbon emissions from new development	- Establishing a Carbon Offset Fund and programme and the estimated net carbon reductions achieved.

Further Information:

- PCC (2021) *Mitigating climate change in Portsmouth background paper*
- PCC (2021) *Adapting to climate change in Portsmouth background paper*

Question 29. Carbon and Lower Carbon Technology

- Do you agree with the proposed approach to Policy D4?
- If not what changes would you suggest and why?
- Should the Council require major development to offset any residual/ unmitigated carbon emissions through a contribution to a Carbon Offset Fund? 28d. If so, how should the contribution be calculated - do you agree with the suggested rate of £95 per tonne per annum for the required period?

6.5 Heritage and Archaeology (Policy D5)

Figure 24- Built Heritage Assets



- 6.5.1 The city's numerous heritage assets¹⁰⁷ are valued for their architectural, aesthetic, historic, communal and evidential contribution to the city. Heritage assets can also offer an opportunity for 'culture-led regeneration' and the achievement of wider environmental, social, and economic objectives.

Portsmouth's historical distinctiveness

- 6.5.2 Portsmouth is the UK's principal naval dockyard - a historic maritime city of national and international significance. Its heritage makes a vital contribution to its distinctiveness, sense of place and quality of life for its residents. In addition to its critical role in attracting visitors to the city (which underpins the city's tourism economy), it also provides an irreplaceable resource supporting recreation, education, and other uses.
- 6.5.3 The city's built heritage is expressed in the historic buildings and townscape of the naval dockyard, in the extensive network of military defences which perimeter the city, and in the barracks and other spaces/ sites associated with the navy's long historic presence (a presence which stretches back almost a thousand years).
- 6.5.4 The city's heritage is not, however, limited to assets directly associated with the military; of equal importance are pre and post medieval religious buildings and the best examples of mass housing and development associated with Portsmouth's historic rapid growth. Assets linked to the emergence of Southsea as a picturesque and exclusive satellite suburb and subsequently a seaside holiday resort with attractions of its own, are also important, as are a limited number of key 20th Century assets that have also been identified as having heritage significance.

Tools for understanding and assessing heritage significance and impact

- 6.5.5 When considering design proposals that would affect heritage assets, applicants are encouraged to consult the council's Historic Environment Record (HER).
- 6.5.6 Data from the HER should be used to help understand and inform analysis of the asset's significance. Where required, this should be summarised within a supporting *Heritage Statement*, in conjunction with an assessment of any impact the proposal may have on the asset. This Statement can be either a standalone document or integrated within a *Design and Access Statement*, and will be used by the council to aid its assessment of a proposal.

Heritage and Archaeology

- 6.5.7 Portsmouth's Historic Environment Record (HER) testifies to the city's diverse archaeology. It is dominated by its more recent naval past, with the historic

¹⁰⁷ Heritage Assets include designations such as Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, and Historic Parks and Gardens

dockyard and its collection of historic ships, and the military fortifications surrounding the city.

- 6.5.8 This importance extends as far as the defences of World War I & II, and sites relating to the embarkations of the D-Day fleet.
- 6.5.9 Notwithstanding its diversity, the extensive development of Portsmouth over time has left it poorer in terms of pre-modern archaeological remains, with few discovered sites connected to the city's more historic past (there are, for example, no discovered hillforts, Roman villas or burial mounds). However, artefacts recovered in the city in recent decades have indicated medieval and Roman occupation, and perhaps earlier. Therefore, areas not compromised by modern development offer the potential to shed light on an otherwise lost component of Portsmouth's past.
- 6.5.10 Where archaeology is a material consideration in the determination of a planning application, the council may require an assessment (through an appropriate desk-based assessment) to be made which sets out a full understanding of the significance of the archaeological remains (whether standing or buried) and the impact of the development on those remains, including consideration of opportunities for enhancement, and mitigation of any impact. It should be sought as far as possible to preserve or enhance those remains and their setting to enable them to make a positive contribution to quality and sense of place.
- 6.5.11 In some cases, there may be potential for as yet unrecorded archaeological remains of sufficient importance to potentially influence the determination of the application. In these circumstances it may be necessary (in addition to the desk-based assessment) to support the application with the submission of an archaeological field survey, often referred to as an evaluation. As a minimum the Heritage or Archaeological Statement should have consulted the Portsmouth HER.
- 6.5.12 Archaeological remains are finite and fragile, and care should be taken to ensure that they are not needlessly or thoughtlessly harmfully impacted. Development that has an impact on archaeological remains should, where appropriate, seek to preserve those remains by a sensitive approach to design and construction which minimises harm. Where this is not possible, a programme of archaeological recording, investigation and excavation may be required as appropriate.
- 6.5.13 Where the merits of development are considered by the council to outweigh the significance of the archaeological remains and/ or would result in the loss or harm of archaeological evidence, the Council may require archaeological recording of those remains. Such recording would be secured by condition attached to any planning permission issued.

6.5.14 Policy D5 will apply to any proposals affecting the fabric and/or setting of designated heritage assets including: Scheduled Ancient Monuments, Listed Buildings (at Grade I, II* and II), Registered Parks and Gardens, Conservation Areas, and archaeological find sites, where relevant. It will also apply to non-designated heritage assets including those identified through the Council's Local List and any other buildings, structures or sites which may come to the council's attention that are considered to enjoy objective and justifiable heritage merit.

Policy D5: Heritage and Archaeology

To ensure the appropriate conservation and, where possible, enhancement of the city's heritage assets (including archaeology) all proposals must conserve or enhance the city's heritage assets in a manner appropriate to their significance.

Development affecting heritage assets (including archaeological assets) will only be supported where:

- a) The applicant has robustly demonstrated a full understanding of the significance of the heritage assets and their setting, and the impacts of the development proposal on their significance. This should be proportionate to the importance of the heritage asset and their settings; and
- b) Conserves or enhances heritage assets and their settings.

Development that will result in substantial harm or loss to heritage assets, including archaeological assets, and their settings will be supported only if it has been demonstrated that the public benefits of the proposal outweigh the harm or loss, or all of the following apply:

- i) The nature of the asset prevents all reasonable uses of the site; and
- ii) No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- iii) Conservation by grant-funding or some form of not for profit, charitable, or public ownership is demonstrably not possible; and
- iv) The harm or loss is outweighed by the benefit of bringing the site back into use.

Policy Monitoring	
Policy Aim	Key Indicator(s)
➤ Protecting and enhancing the city's conversation areas, listed buildings and other heritage assets	<ul style="list-style-type: none"> - Number of decisions refused on heritage grounds - Number of objections from Historic England

Question 30. Heritage and Archelogy

a. Do you agree with the proposed approach to Policy D5?

b. If not what changes would you suggest and why?

6.6 Heritage Enhancement (Policy D6)

- 6.6.1 Portsmouth has a significant track record, going back many years, of pursuing and implementing opportunities for the creative re-use of heritage assets. The Historic Dockyard, a 'top ten' UK tourist attraction by visitor numbers represents one of the most significant and successful ongoing examples of heritage-based enhancement in the country. Other schemes have also proved extremely successful, such as the comprehensive mixed use redevelopment of the historic Gunwharf Quays and residential conversion of the Royal Marine Barracks at Eastney (the longest and most visually impressive barracks in the country). More recently, the conversion of the historic casemates of the 'Hotwalls' in Old Portsmouth to artists' studios and café has responded and added to the city's distinctiveness and diversity, whilst demonstrating the Council's commitment to heritage renewal.
- 6.6.2 Historic England (HE) produce an annual register of heritage assets considered to be 'at risk' (as a result of neglect, decay or inappropriate development). In common with all local authority areas, Portsmouth has a number of entries on the register. In conjunction with Policy D1: Design, this policy is intended to contribute to the council's positive approach to the conservation and enjoyment of the city's historic environment. It indicates the council's intent to engage, where possible, with the owners of 'at risk' heritage assets to encourage their repair and/ or enhancement and, where necessary, take action under the Council's statutory powers to secure necessary works.
- 6.6.3 Policy D6 responds to the scope which many of the city's heritage assets, including some of its largest and most prominent sites, offer to help deliver wider social, economic, and environmental benefits. The policy also aims to facilitate efforts to go beyond simple repair and maintenance measures for the city's 'at risk' heritage assets, including those not included on HE's register. Efforts could include exploring the identification and promotion of viable uses, or more comprehensive and ambitious proposal schemes of heritage-focussed enhancement and renewal that contribute towards wider regeneration.
- 6.6.4 A 'Heritage Strategy' would need to explore the issue of threatened assets and their renewal more comprehensively, perhaps through identifying priority sites and actions for the council.

DRAFT DEVELOPMENT MANAGEMENT POLICY D6: HERITAGE ENHANCEMENT

Policy D6: Heritage Enhancement

To help secure the future of the city's heritage assets, the council will monitor heritage assets that are considered to be 'at risk' through neglect, decay or other threats, and will seek remedial solutions for these assets through engagement with owners where possible.

Positive consideration will be given to proposals that would ensure the future of an asset through its enhancement and/or its ongoing repair and maintenance.

In seeking for remedial solutions, the council may exercise its statutory powers to aid in securing positive outcomes for assets that are considered to be 'at risk'.

Policy Monitoring	
Policy Aim	Key Indicator(s)
<ul style="list-style-type: none"> ➤ Protecting and enhancing the city's conversation areas, listed buildings and other heritage assets. 	<ul style="list-style-type: none"> - Heritage assets within the city on the 'heritage at risk register' - Decisions refused on heritage grounds - Conservation Areas with an up to date Appraisal

Question 31. Heritage Enhancement

a. Do you agree with the proposed approach to Policy D6?

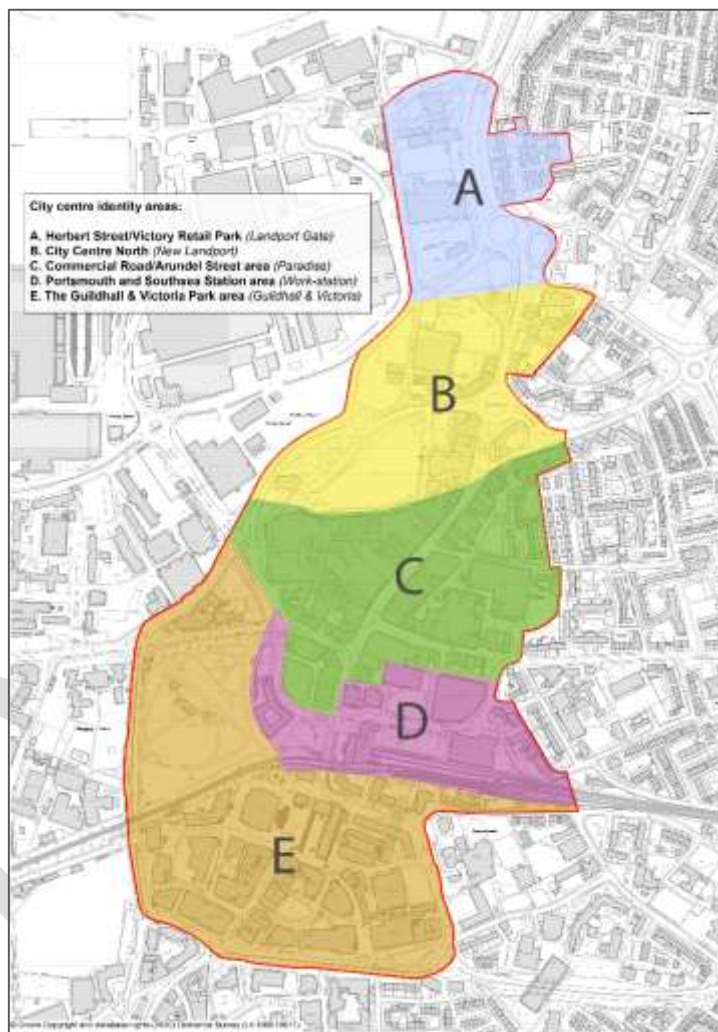
b. If not what changes would you suggest and why?

7 - Strategic Development Sites

The new Local Plan proposes to focus significant new growth requirements in key locations that are, or can be made sustainable, through limiting the need to travel and offering a choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

7.1 Portsmouth City Centre (Policy S1)

Figure 25-City Centre Strategic Site Boundary and Proposed 'Identity Areas'



- 7.1.1 Portsmouth City Centre is recognised as a centre of importance for new development in the city and in 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.
- 7.1.2 Located on the central-west of Portsea Island, the City Centre is an area some 60ha extending from the Herbert Street industrial buildings near the A3 Mile End Road, to Guildhall Walk and the law courts/ police station buildings off Winston

Churchill Avenue (A2030). The City Centre lies due south of Portsmouth International Port and east of Gunwharf Quays and the Historic Dockyards, which are some 10 minutes' walk away. Directly adjacent to the west of the City Centre lies the HM Naval Base, which is physically separated from the City Centre by its boundary walls and Hope Street; and to the east and south lies the respective residential areas of Buckland, Landport, and Somerstown. Air quality in proximity to the city centre road network is a recognised issue (AQMA 7, 11 & 12).

- 7.1.3 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 Edinburgh Road. Prominent development in this area includes Cascades, a covered shopping centre originating from the late 80s, and the Tesco/multi-storey car park building along Crasswell Street.
- 7.1.4 To the south of Commercial Road lies the Portsmouth & Southsea Railway Station, itself a Grade II listed building, with a railway viaduct forming a physical barrier with the area to the south. This area has seen some recent development in the form of purpose-built student accommodation towers of Catherine House, Stanhope House, and Crown Place. Existing larger plots on the eastern edge of this area include the former Post Office/Royal Mail depot building and the Matalan retail unit and car park. To the west lies the 3.5ha open space of Victoria Park (Grade II listed Park and Garden) and Portsmouth St John RC Cathedral (Grade II listed building).
- 7.1.5 The remaining area of the City Centre comprises the current civic areas of the Guildhall and its square. The Guildhall, an impressive Classical-style Grade II listed building, is a multi-use venue for concerts, theatre, ceremonies, and conferences, as well as hosting the council's civic functions. Opposite the Guildhall lies the Civic Offices, which are predominantly in use by Portsmouth City Council. Nearby lies Guildhall Walk, which has become known for its cultural, social, and leisure offer with its pubs, bars, restaurants, cafes, and the location of the New Theatre Royal. To the south, adjoining Winston Churchill Avenue, are the judicial facilities of the law courts and police station and buildings and accommodation associated with the University of Portsmouth.
- 7.1.6 It is recognised the quality and range of development (including employment, leisure, entertainment, and community facilities and the night-time economy) within Portsmouth City Centre are in need of enhancement, as well as the design and appearance of buildings and public spaces. There are many areas which are under-utilised, or which do not offer a high-quality and attractive environment for people to enjoy, and do not showcase Portsmouth to its full potential. Air quality in proximity to the city centre road network is also a recognised issue (AQMA 7, 11 & 12).

- 7.1.7 During the last decade retail in Portsmouth City Centre has largely reflected the trends seen in the retail sector nationally; declines in the face of competition from online shopping, out-of-centre stores and the shift to a focus on the overall 'experience' a shopping destination can provide. This has affected business owners, the quality of the high street offer and the overall perception of the centre. Since the start of the Covid-19 pandemic, centres have experienced rapid change, including an accelerated shift to online sales. While the current outlook for the high street is uncertain, it is possible that retailers will adapt to new circumstances, using stores as a showcase for products, collection points for online orders or service/ storage locations, for instance.
- 7.1.8 However, 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 number of new homes, new business, commercial and leisure space, new cultural, social and leisure, uses and new community facilities. Together 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 evening and night-time activity).

Regeneration of Portsmouth City Centre

- 7.1.9 A *City Centre Development Strategy* (CCDS), a masterplan covering the City Centre area has been developed on behalf of the Council. The CCDS sets out a vision for the City Centre, in terms of what type of place it should and could become, the types of development which will be sought in the City Centre and the place-making opportunities which may be possible.
- 7.1.10 **Portsmouth City Centre Vision** (taken from the CCDS):
"Every great city has a heart. Portsmouth city centre will continue to be that heart of the city, and will be a beautiful, durable and adaptable place - more compact, more diverse, easier to get around, greener and healthier, and looked after by its happy residents".
- 7.1.11 The future city centre will combine its proud heritage with a pride in its renewal. This will be underpinned by steps to transform the area with a renewed and sustained emphasis on the public realm, as a civilised, attractive, welcoming and open city environment.

New Development in the Centre

- 7.1.12 The CCDS has identified a potential delivery capacity for the city centre, with upper and lower range scenarios depending on the type and mix of development options pursued. Both scenarios reflect what is considered the city centre's maximum capacity, assuming that all identified areas will come forward for

redevelopment over time with a mix of building heights¹⁰⁸. This gives an indicative capacity in the region of 5,183 - 6,128 new homes and 77,100 to 88,300sq m of commercial, leisure, community and health uses. The majority of this is expected to be delivered during the plan period. The upper range is what could be achieved with a housing mix with a preference for 1-2 bedroom apartments and a near-zero parking standard for residents. The lower range is based on an increased proportion of larger dwellings within the overall mix and a 50% resident car-parking ratio.¹⁰⁹

7.1.13 The details of the anticipated delivery capacity range is set out in Table 6.

Table 6 - Portsmouth City Centre Estimated Development Capacity

Scenario	Homes	Retail	Commercial	Community & Health	Education
Upper estimate	6,128	3,000	52,900	5,900	10,700
Lower estimate	5,183		48,700		

7.1.14 It is acknowledged there will be some barriers to development that would need to be overcome to deliver the full development potential of the city centre, including land ownership/ assembly issues, development viability and provision of enabling infrastructure for instance. A holistic approach would be required to deliver the redevelopment of key areas in multiple ownership. This will involve the Council working proactively in partnership with landowners and key stakeholders and formulating comprehensive strategies for land-assembly.

7.1.15 Implementing the regeneration of the city centre may require the development of a Supplementary Planning Document, or other guidance, to enable and support implementation of development and to provide further detail or guidance on masterplan design objectives and parameters.

7.1.16 The Council is involved in a range of place making initiatives, in partnership with internal and external stakeholders, which will be guided by the emerging high-level masterplanning work of the CCDS for the city centre. Portsmouth has also been awarded funds through the Government's *Transforming Cities and Future High Streets* fund that will help realise the vision for the area. Other avenues for project funding may arise in the future, either through existing frameworks (e.g. One Public Estate) or new frameworks from local, regional, and national initiatives.

¹⁰⁸ All space assumptions for indicative development capacities are detailed on page 62 and Appendix 4 of the CCDS.

¹⁰⁹ Ultimately, the overall approach to parking provision for new development will need to be in-line with *Policy C3: Transport* and the other relevant guidance.

City Centre identity areas and key opportunities

- 7.1.17 The CCDS has identified five distinct identity areas, with opportunities for types of uses, public space and urban realm and unique design identity.
- 7.1.18 The identity areas are defined in the above map; from north to south the areas are as follows (with suggested area names from the CCDS):
- A. Herbert Street/Victory Retail Park ('Landport Gate')
 - B. City Centre North ('New Landport')
 - C. Commercial Road/Arundel Street area ('Paradise')
 - D. Portsmouth and Southsea Station area ('Work-station')
 - E. The Guildhall & Victoria Park area ('Guildhall & Victoria')

Question 32. City Centre identity areas and key opportunities

- a. Do you agree with the proposed identity areas and key opportunities for the regeneration of the city centre?
- b. If not, what alternatives should be considered and why?

A - Herbert Street/Victory Retail Park ('Landport Gate')



7.1.19 This area comprises the various industrial buildings adjacent Herbert Street, and the Victory Retail Park. This area is currently bounded by the A3 Mile End Road, Princess Royal Road, Flathouse Road, and Hope Street, which create a physical 'severance' from this area to the surrounding areas. There are three potential options for this area; (1.)

realising its great potential as a major city centre gateway with a new residential neighbourhood supported by a new linear park to act as a focal space and green connecting corridor rest of the City Centre to the south. A potential landmark building (for education use or other community use for instance) could signify the entrance to the new city centre.

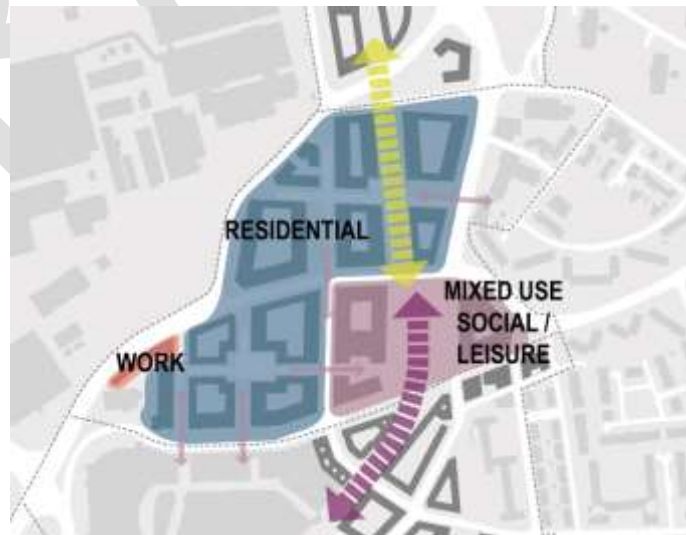


7.1.20 Alternatively, (2.) residential redevelopment could be limited to the southern half of the site, retaining the existing employment uses to the north; or (3.) the whole area could be allocated for employment uses, given the proximity to existing employment land to the north and west of the site and the recognised need for additional land for storage and distribution land (Use Class B8) in proximity to accessibility to the Portsmouth International Port (for further details see *Policy E2: Employment Land*).

B - City Centre North ('New Landport')



7.1.21 City Centre North comprises the area south of the vacant former ABC cinema site, down to the Sainsbury's supermarket site and the Marketway car park (former Tricorn site). Much of the land within this area is under-utilised. The area has great potential to be a vibrant neighbourhood;

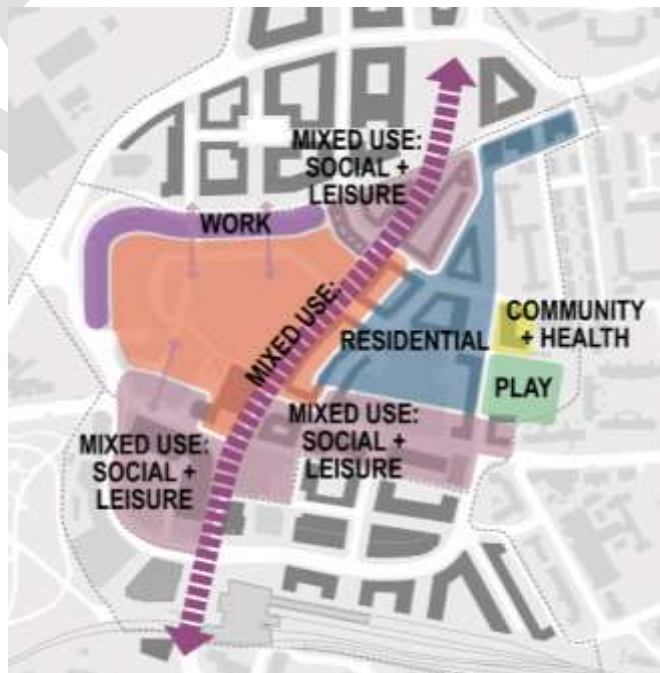


with potential for additional new residential and mixed use development and as a location for civic and commercial uses. There is also potential for a new public square or other improved public realm areas to provide another key focal space for the City Centre. There are potential opportunities for enhancements to Hope Street and Marketway to create better streets and connections for people.

C - Commercial Road/Arundel Street area ('Paradise')



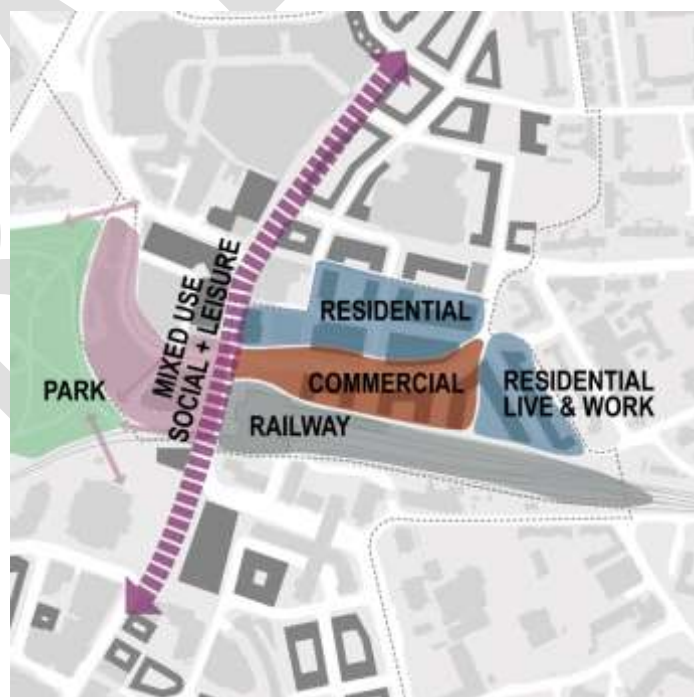
7.1.22 The area covers Commercial Road and the connecting streets, inc. Arundel Street, Charlotte Street, and Edinburgh Road. Commercial Road itself is currently a traditional pedestrianised 'high street' destination that includes the Cascades Shopping Centre. This area is envisioned to have potential to provide a diverse mix of retail, dining, leisure, and entertainment uses at the ground floor level, supported by upper-level residential dwellings and business space. This will be supported by an enhanced public realm and spaces to create a vibrant and high-quality destination to increase the attractiveness and convenience of the area during the day and into the evening.



D - Portsmouth and Southsea Station area ('Work-station')

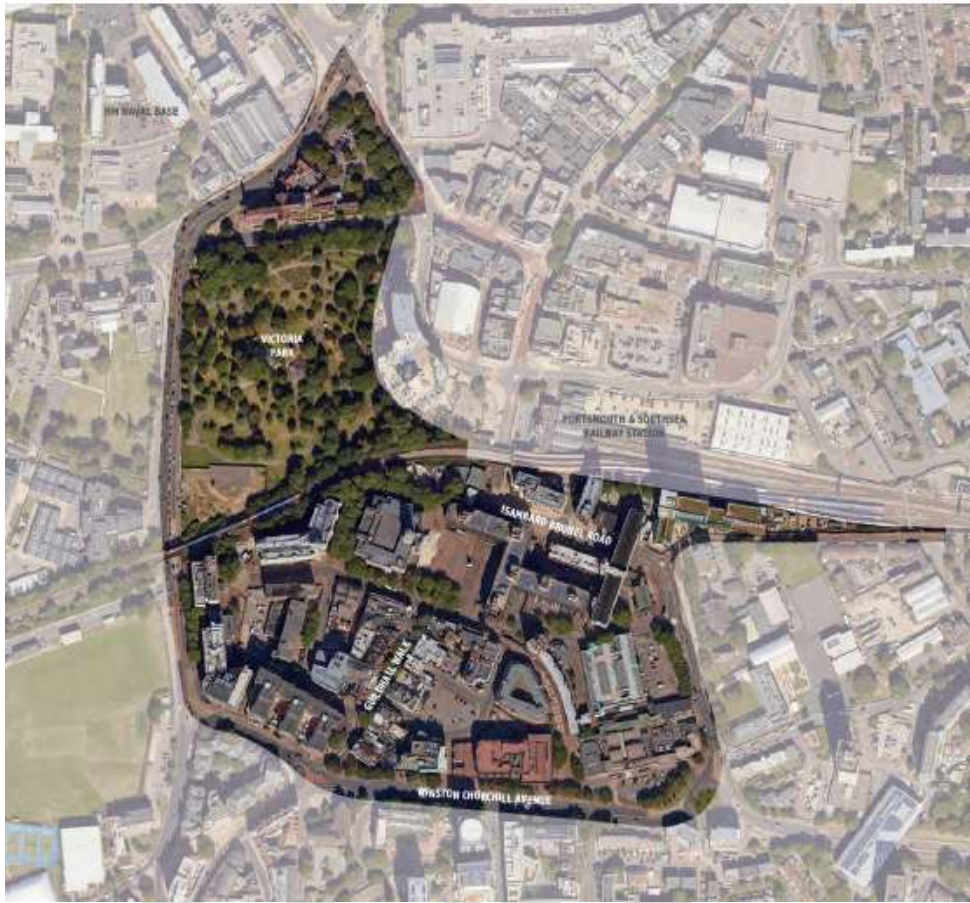


7.1.23 This area covers Portsmouth and Southsea Station, the Matalan retail unit and car park, Stanhope Road car park and the area around Station Road/Slindon Street. This area has the potential to be focused on creating high-quality, mixed-use developments for commercial workspaces, social/leisure space and new residential dwellings.



7.1.24 New development should be centered around the area's public transport provision, such as the railway station and bus network. A key focus will be on enhancing the arrival experience and associated public realm to create a welcoming and high-quality environment. The setting of the Listed Station building could be enhanced by a new public space, providing an attractive arrival point into the city centre. Provision of a new high-quality public realm and with public art and other interactive features should help to change perceptions and experiences of the area at all times of day.

E - The Guildhall & Victoria Park area ('Guildhall & Victoria')



- 7.1.25 This area covers the existing Civic Quarter, including Guildhall Square and Guildhall Walk, the Civic Offices, Central Library and law courts and police station as well as Victoria Park and some of the University of Portsmouth campus. This area will continue to celebrate and respect the area's core cultural and historic heritage, whilst offering a new mix of uses (to include social, leisure and commercial uses), as well as the continued development of the University of Portsmouth campus. There is also opportunity to develop a new residential neighbourhood supported by a network of enhanced and attractive streets.



DRAFT STRATEGIC POLICY S1: PORTSMOUTH CITY CENTRE

- 7.1.26 Policy S1 sets out the estimated development capacity of the city centre, proposed development options and draft key principles for proposals within the draft Portsmouth City Centre 'identity areas' for consultation.
- 7.1.27 New development in Portsmouth City Centre should be exemplary and set the standard for city centres of the future. New development will contribute to the greening of the city and new development suitable for a 'zero carbon' future and the anticipated impacts of climate change, in accordance with other policies in the Local Plan. Proposals will need to have regard to the vision for the long-term regeneration for the City Centre and the implementation of the CCDS framework and/ or other relevant guidance documents, and have due consideration to other identified development opportunities in the city.

Draft Strategic Policy S1: Portsmouth City Centre

The City Centre is estimated to have capacity to delivery approximately 5,180 - 6,120 new homes, 77,100 - 88,300 sqm of new commercial floorspace (Use Class E), and c.10,700 sqm of education floorspace (Use Class F1).

To achieve the vision for the future of the City Centre, planning permission will be granted where proposals contribute towards the following overarching principles:

- I. The delivery of the identified amount of new homes and other town centre uses.
- II. An accessible, beautiful, and distinctive high-quality built environment, public realm, public spaces, green spaces, workplaces, new neighbourhoods and cultural and visitor attractions;
- III. A positive response to existing fixed assets, constraints and context, including the historic environment and cityscape;
- IV. An emphasis on the creation of a network of streets and spaces which, in spirit, recreate Portsmouth's historic pattern of perimeter blocks;
- V. Human scale, mid-rise development (up to six storeys) across the majority of the centre with the potential for landmark tall buildings in key locations as appropriate;
- VI. A people and community focused approach to development, taking account of connections to surrounding residential areas (existing and proposed);
- VII. A connected, legible, permeable and pedestrian-friendly hierarchy of routes;
- VIII. A sustainable shift in transport and movement patterns, away from private cars and towards active travel and public transport, including improving the 'arrival' experience at key gateways.

Question 33: City Centre Regeneration Principles

- a. Do you agree with the proposed overarching principles for the redevelopment of the city centre? b. If you disagree, what changes do you suggest and why - i.e. are there any other design principles that should be included?
- c. Would you like to see a clear design identity across the city centre (or within each identity area), or more design variation?
- d. Should the average height of development be six storeys as proposed, or higher or lower?

A. Herbert Street/Victory Retail Park ('Landport Gate')

Images to added.

Option 1 - Residential led development

- i. Delivery of new residential neighbourhood (760 - 930 homes) with a mix of commercial floorspace to include office, social and leisure and community/health uses (aprox. c.1,900 sqm) and new education floorspace (approx 2,100 sqm).
- ii. A new linear green park as a defining place-making feature, designed to benefit all ages and to create an active link to Commercial Road.

Option 2 - Residential and employment uses

- iii. Retaining employment land (approx. 13,200sq m) to the north and a community of aprox. new 550 homes to the south.
- iv. Supported by a mix of commercial, education, social/ leisure and community uses as above.

Option 3 - Employment uses

- v. Employment led development in-keeping with the wider land use to the north and west of the area and to help meet specific employment land needs.

Question 34. City Centre - Herbert Street/ Victory Retail Park Regeneration

- a. Which development option do you think should be further considered as for the future of the area?
- b. If residential-led (Option 1), do you agree with the proposed scale of development? c. Would this area be suitable for a new linear park?
- d. Do you have any other comments on the approach to the future of this area?

B. City Centre North ('New Landport')



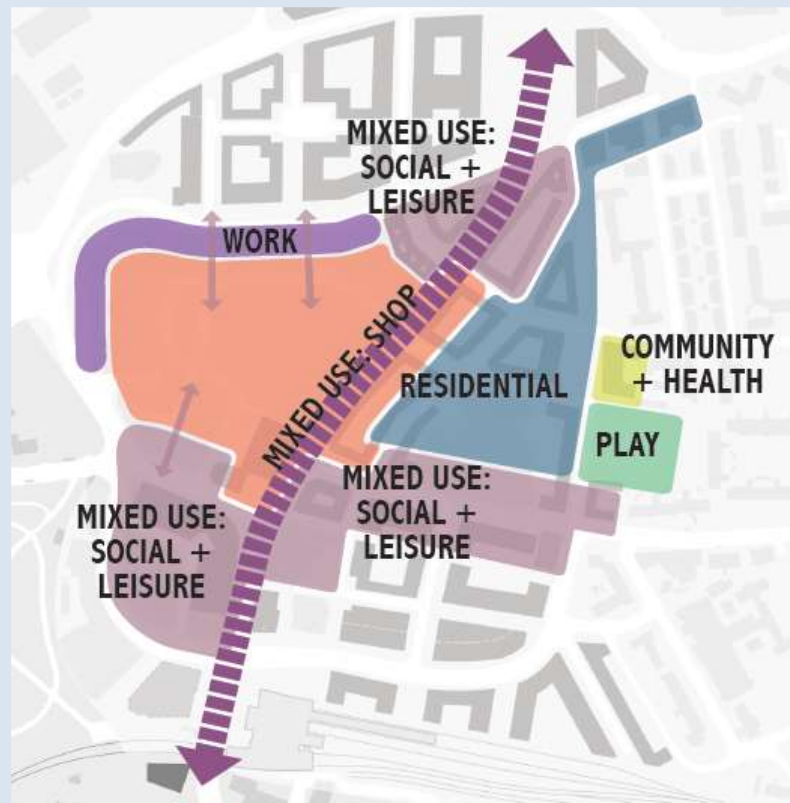
- i. Delivery of a significant number of new homes (approx. 1,430 - 1,650), plus commercial and leisure floorspace and community/ health uses (c.24,900 - 33,000 sq m);
- ii. Continuation of the new linear green park, designed for all ages, as a place-maker and to create an active link to Commercial Road;
- iii. New and improved connection points linking to Commercial Road, the city core, and surrounding areas;
- iv. A new square at Commercial Road/ Lake Road to act as a major public realm attraction and anchor space.

Question 35. City Centre - City Centre North Regeneration

- a. Do you agree with the proposed types of uses and the scale of development for this area? b. If you disagree, what should the future for this area look like?
- c. Would this area be suitable for a new public square - and where should this new public space be located?

i.

C. Commercial Road/ Arundel Street area ('Paradise')



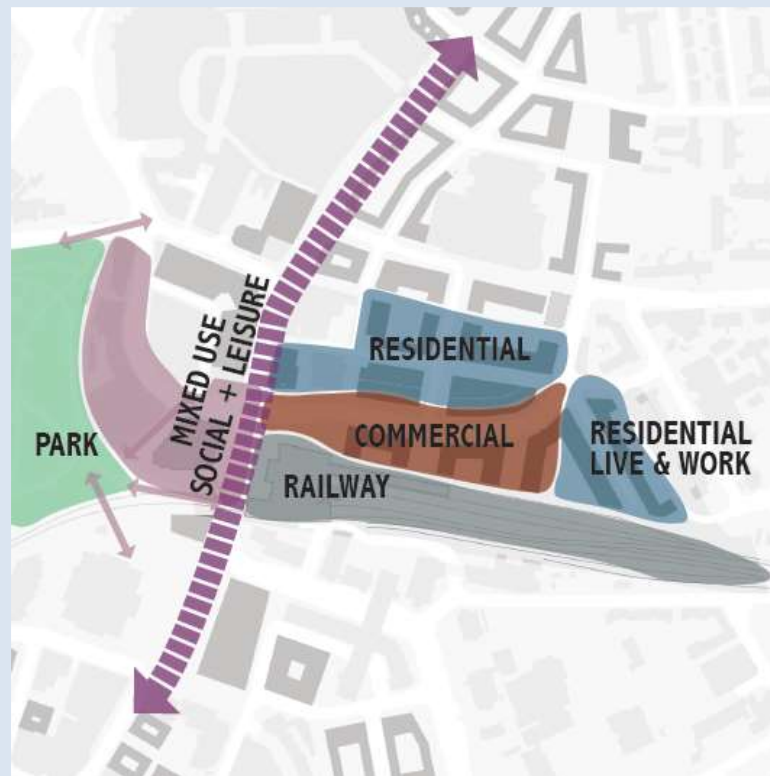
- i. Delivery of a significant number of new homes (aprox. 1,310 - 1,540) and additional commercial and leisure floorspace and community/health uses (c.10,200 - 11,500 sqm)
- ii. Fundamental shift from a retail-only focus to include a diverse range of work, social, and leisure uses;
- iii. A consistent mid-rise height development along Commercial Road to unify the streetscape of this important route.
- iv. Renewal of Commercial Road as a high-quality pedestrian route with a vibrant and striking public realm, with provision of art installations, lighting and colour to enliven the day and evening;
- v. Enhanced streetscape and landscaping of interconnecting streets, for instance through street trees, street furniture and public realm features;
- vi. Enhances to the north and west facades of Cascades Shopping Centre to include active ground floor uses to transform the Charlotte Street/ Unicorn Road frontages;
- vii. Redevelopment of the Tesco superstore/ Crasswell Street multi-storey car park/ and Paradise Street /Buckingham Street/ Jacob's Street to create a significant new residential community and a connected and coherent pattern of streets.

Question 36. City Centre - Commercial Road/ Arundel Street Regeneration

a. Do you agree with the proposed types of uses and the scale of development for this area? b. If you disagree, what should the future for this area look like?

c. Should the Commercial Road area undergo a fundamental shift from retail to a more diverse range of work, social, and leisure uses?

D. Portsmouth & Southsea Railway Station ('Work-station')



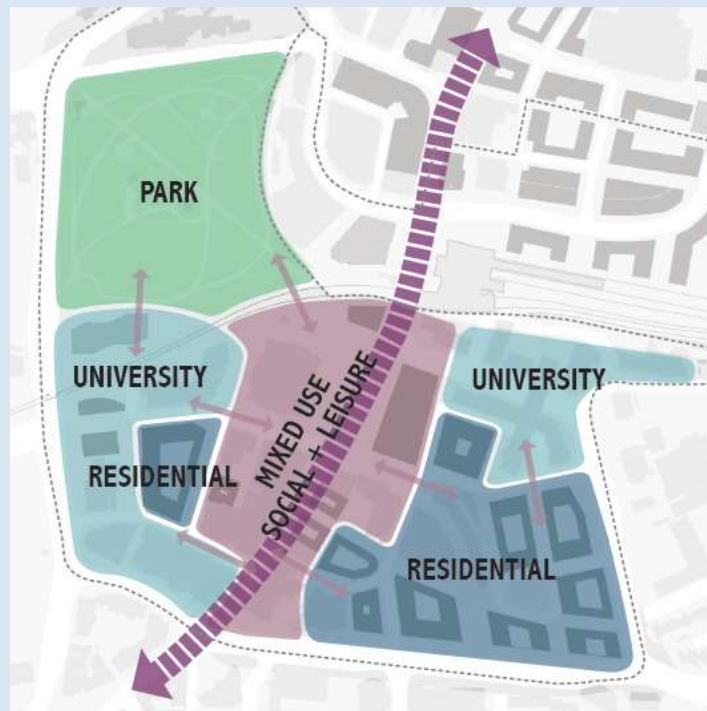
- i. Redevelopment to a contemporary mixed-use employment area, with new homes (aprox. 670 - 770), commercial floorspace and social and leisure uses (c.25,100 - 26,900 sqm)
- ii. Provision of a variety of employment space formats, with active and attractive frontages onto Station Street;
- iii. Enhancement the appearance and setting of the Listed Portsmouth & Southsea Railway Station as a key city gateway, including new public space;
- iv. Creation of a cycling-led transport hub, including provision for high quality covered parking, servicing and repair facilities and changing and showering facilities;
- v. Improvements to pedestrian and cycle routes in the connecting streets to key destinations within the city centre and onward routes to the rest of the city;
- vi. High-quality public realm and public art (*e.g. decorative, colourful and/or reflective cladding and creative, interactive and/or animated lighting*) including the existing railway bridge and underpass;
- vii. Improved or new realigned footbridge over the railway to enhance connectivity within the city centre and surrounding neighbourhoods.

Question 37. City Centre - Portsmouth & Southsea Railway Station Regeneration

a. Do you agree with the proposed types of uses and the scale of development for this area? b. If you disagree, what should the future for this area look like?

c. What else should be considered for the enhancement of the appearance and setting of the Portsmouth and Southsea Railway Station as a key arrival 'gateway'?

E. The Guildhall & Victoria Park area ('Guildhall & Victoria')



- i. Delivery of new homes (approx. 990 - 1,220) and additional commercial floorspace including office and social and leisure uses (c.15,000 sq m) and educational floorspace (c.8,600 sq m).
- ii. Redevelopment the Law Courts, Combined Court Centre buildings and Isambard Brunel Car Parks to create a sustainable new residential community on a connected and outward-looking network of streets;
- iii. Protecting and strengthening the appeal of The Guildhall, Guildhall Square, Guildhall Walk and Victoria Park as the city centre's cultural and leisure destination for both daytime and evenings;
- iv. Enhancement of Guildhall Square as a contemporary public space and improved legibility of access to the local street network;
- v. Take a positive approach to the University of Portsmouth's campus, its setting and opportunities for enhancement and estate development;
- vi. Maintaining lower level development (4-storey height) along the majority of Guildhall Walk in-line with its existing scale and character;
- vii. Improvements to the entrances, edges and approaches to Victoria Park to increase its attractiveness and use;
- viii. Transformation of Winston Churchill Avenue to a modern city boulevard, utilising mature trees and space for wider footways, greenery and easy crossing and spaces for pedestrians and cyclists;
- ix. Public realm improvements of principal pedestrian corridors (e.g. the route from Guildhall Square and Central Library south to Winston Churchill Avenue).

Question 38. City Centre - The Guildhall & Victoria Park Area Regeneration

- a. Do you agree with the proposed types of uses and the scale of development for this area (including the redevelopment of the law court/police station area to residential)? b. If you disagree, what should the future for this area look like?
- c. Do you agree with the proposed transformation of Winston Churchill Avenue - what else should be included or changed about this space?

Implementation

The Council will work in pro-active partnership with landowners and stakeholders, and/or formulate comprehensive strategies for land-assembly (e.g. Compulsory Purchase Orders). This could also mean bringing forward a Supplementary Planning Document (or any other such document) to provide further policy guidance to support a masterplan, to inform particular design objectives and parameters, and to expedite the enabling and delivery of development.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
✓	✓	✓	✓	✓	✓

Policy Monitoring

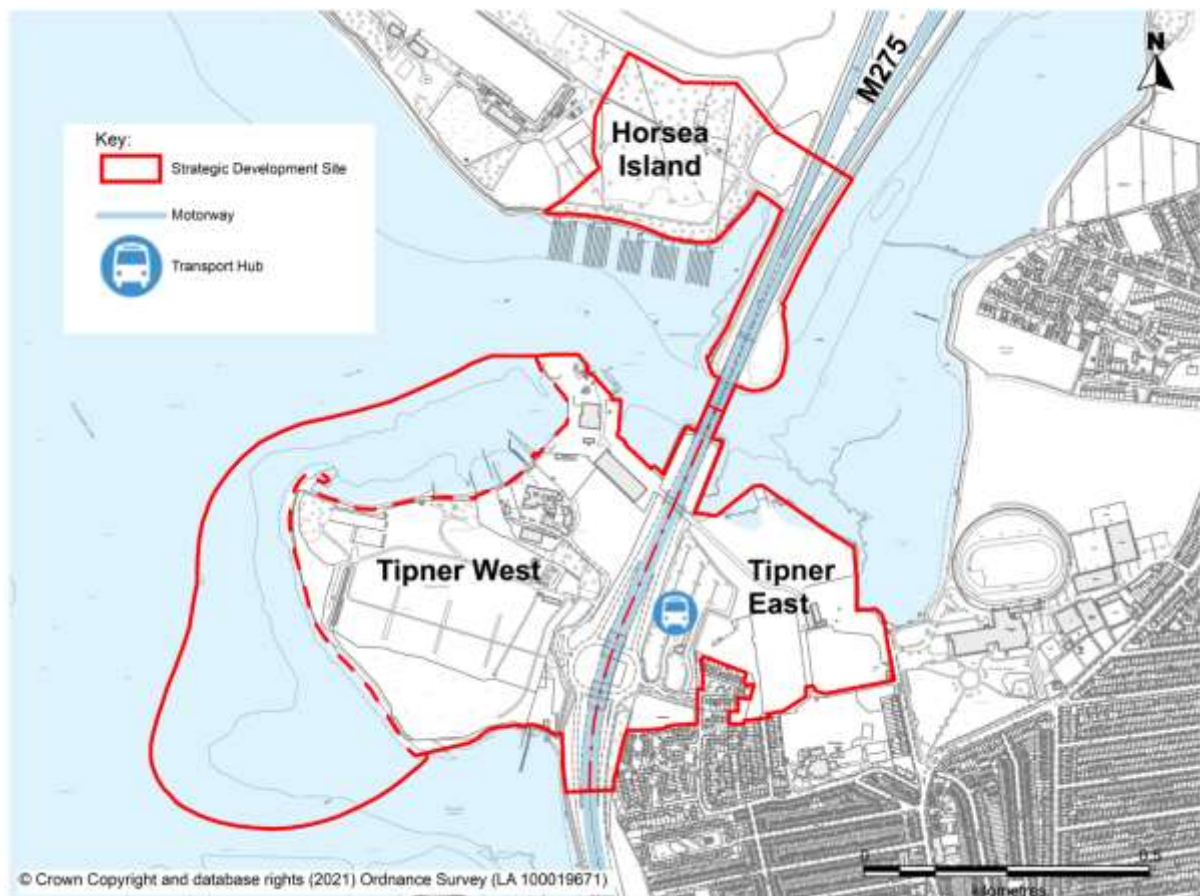
Policy Aim	Key Indicator
➤ The delivery of 5,180 - 6,120 new homes, approximately 77,100 - 88,300 sqm of new commercial floorspace (Use Class E), and c.10,700 sqm of education floorspace (Use Class F1).	- Grant of planning permission(s) and progress towards site delivery

Further Information:

- JLL (2020) *Portsmouth City Centre Development Strategy (CCDS)*
- JLL (2020) *Portsmouth City Centre Masterplan Retail Focus Statement*
- PCC (2021) *Housing Economic Land Availability Assessment (HELAA)*

7.2 Tipner (Policy S2)

Figure 26 - Tipner



- 7.2.1 Portsmouth's densely populated urban area presents few options for significant, wide scale regeneration; the redevelopment of the Tipner peninsula could present the opportunity to create an exemplary, new sustainable community in a prominent location just off the M275 creating a new statement 'gateway' into the city.
- 7.2.2 Tipner is divided by the motorway into Tipner West and Tipner East. Tipner East is the smaller of the two areas, closely linked to the Stamshaw area of the city. It is largely derelict land on the site of a former dog racing track with the benefit of an existing planning permission for 626 homes. Tipner East is also the existing location for Portsmouth's Park and Ride, key to achieving the city's sustainable transport aims. Tipner West includes a former MoD firing range, scrapyard, sailing club, a Special Education Needs (SEN) school and an area currently in use as a lorry park for the Port. The potential development area also includes the southern portion of Horsea Island, located west of the M275, which is currently scrubland formerly in use by the MoD. The rest of the Horsea Island area is due to open as a Country Park.
- 7.2.3 The identified areas for redevelopment are immediately adjacent to Portsmouth Harbour; designated as a Special Protection Area (SPA), Ramsar site and Site of

Special Scientific Interest (SSSI) for its habitat importance, particularly for the features that support overwintering birds. There is a deep water access point at Tipner which allows access into harbour at all tides.

Why is this policy needed?

- 7.2.4 The existing area is partly derelict, significantly under-utilised and in need of both remediation to address a long history of polluting uses and redevelopment to vastly improve the quality of the environment in this part of the city.
- 7.2.5 While the existing area was allocated for redevelopment in the *Portsmouth Core Strategy (2012)*, for approx. 2,200 homes and a range of enabling infrastructure, the site is now being promoting for a 'once in a generation' opportunity for a more ambitious, highly sustainable new development that would make a substantial contribution towards the city's growth needs.
- 7.2.6 The more ambitious, forward looking proposal would be focused around the development of a new marine employment 'hub of excellence' of national significance at Tipner West (utilising the site's deep water access into the harbour), made viable by the creation of a larger development area through land reclamation to establish a new supporting community of around 3,500 new homes. The marine employment hub could support a specialist marine and maritime innovation quarter and/or enterprise zone for the sub region, partnering with local higher education and training providers to deliver accessible and skilled work for Portsmouth residents. Co-locating a new community with the marine employment hub reflects the national policy preference for creating sustainable mixed-use schemes and would seek to address the need to *balance* the provision of new homes in the city with sufficient employment opportunities to reduce commuting and the associated impacts on air quality.

Land reclamation statement

If the more ambitious option is pursued, and critically, if the harm to the harbour environment can be satisfactorily addressed through the required legal tests¹¹⁰, redevelopment would not only compensate for habitat loss and other in-direct impacts but would deliver significant net gains in biodiversity by providing additional intertidal habitat (featuring net gains in both scale and quality) to that lost/ impacted through land reclamation within the Solent. This would be enhanced by on-site habitat provision and an underlying development strategy that would seek to integrate ecosystem services at all levels.

¹¹⁰ If the project is deemed acceptable under the *Habitat Regulations*. It will need to provide: an assessment that demonstrates that no reasonable alternative solutions can be identified, a sound Imperative Reasons of Overriding Public Interest (IROPI) case and evidence that acceptable mitigation and compensatory habitat measures can be put in place for the direct loss of habitat in the Portsmouth Harbour SPA; thus ensuring that the national and international network of designated sites can be maintained and enhanced.

- 7.2.7 The creation of the new community would be guided by principles that would make a positive impact on the perception of the city and deliver a new community designed to meet the challenges of creating new places for the 21st Century; a new approach to living within Portsmouth. It would be governed by strategies that respond to the Climate Emergency and promote optimal health and well-being, including car free streets, sustainable and active transport, carbon neutral and low carbon living, whilst making full use of modern technology to achieve these goals. Redevelopment would also help to ensure Tipner is resilient to the impacts of climate change over the next 100 years, providing the necessary flood defence infrastructure to protect the low lying site from sea level rise. Due to the potential quantity and mix of housing types and tenures the site area could support, there is an opportunity to deliver a more substantial contribution to the need for affordable housing for Portsmouth residents.
- 7.2.8 Given the limited options for development sites of significant scale within the city, the opportunities for new development need to be maximised where possible. Providing development at a greater scale at Tipner, which has the potential for direct motorway access and sustainable and active travel connectivity to the rest of Portsmouth, would reduce the need to further increase development pressures elsewhere in the city, where the Council would otherwise be required to seek locations for new homes and employment floorspace to meet the identified targets for Portsmouth. Fewer homes at Tipner would also necessitate a re-evaluation of other proposed land designations in the city, such as employment areas or green/ open spaces, and/ or further increases in residential density, scale or height in other key locations. Alternatively, 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 greenfield land within the sub-region.
- 7.2.9 The City Council is required to consider all reasonable alternatives to meet its growth needs within its Emerging Plan, but the specific challenges associated with the opportunity at Tipner, and in particular the impacts on local ecology are acute. The scale of opportunity for housing, employment, the environment and the local community are however equally significant. Three options for the future development at Tipner are therefore described below

Consultation Proposals for Tipner

Option 1: Innovative sustainable community (see Figure 27)

- 7.2.10 A community of up to 4,200 new homes and a marine employment hub (providing approx. 59,000 sq m of employment floorspace) including land reclamation from Portsmouth harbour. The development could comprise an exemplar, highly sustainable, low-or zero-carbon community, delivering predominantly car-free neighbourhoods, highly sustainable transport choices, a wide range of house types including over 1,000 affordable homes, generous green open spaces, water-side living and recreation and development that embraces biodiversity and ecosystem services at all levels.

Option 2: Regeneration of existing area (see Figure 28)

- 7.2.11 The adopted *Portsmouth Plan Core Strategy* considered that the existing land area at Tipner could be capable of accommodating 1,500 homes, 25,000 sq m of employment space and community facilities, if the necessary enabling infrastructure was put in place. If this option was to be retained, the Council would need to find a suitable location for the remaining 2,700 homes and 34,000 sq m of employment floorspace to meet both Government's housing target for Portsmouth and the assessed need for employment space to support economic growth and the marine and maritime sector (and associated sectors) within the region. The proposed bridge to Horsea Island, creating a linkage to the proposed country park, would also not be necessary to support this level of growth, as identified in the current Core Strategy. Such a bridge and other investment in infrastructure and enhancements on the western part of Tipner, such as renewal of flood defenses and remediation of land, are also unlikely to be deliverable as part of a viable proposal which may prejudice the deliverability of this option.

Option 3: Maintain (no strategic scale development at Tipner West) (see Figure 29)

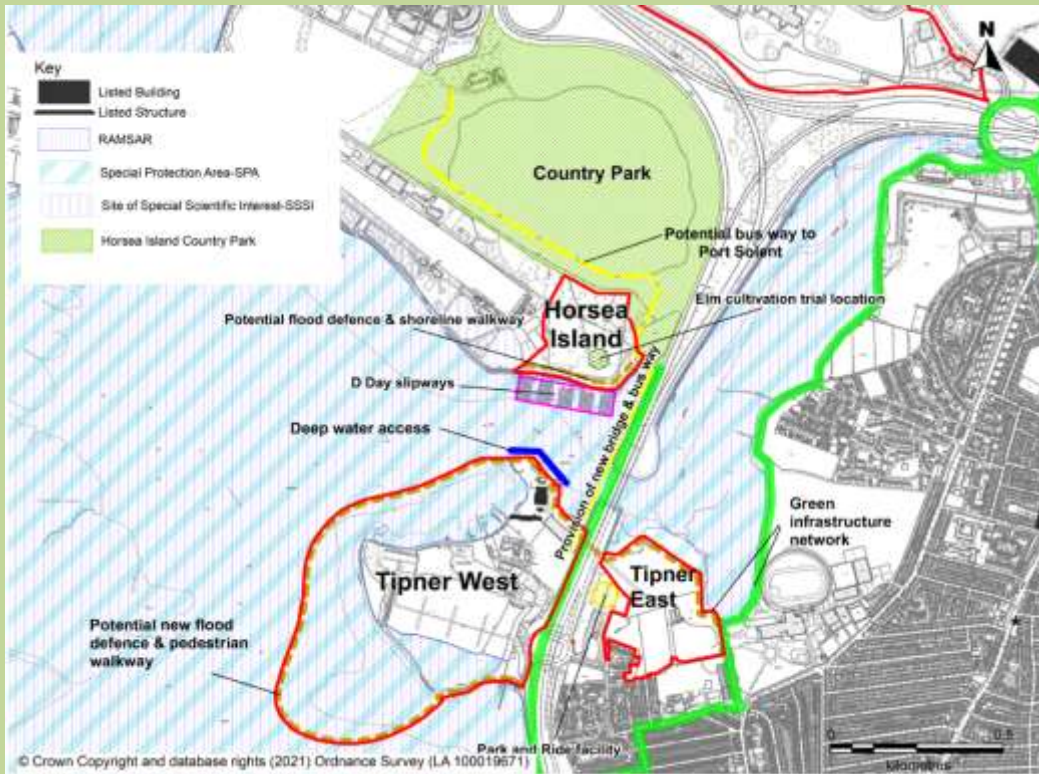
- 7.2.12 While development at Tipner East would continue to be supported no development allocation would be made at Tipner West. Major investment and regeneration (including the provision of flood defence infrastructure) would not be supportable in this location without new homes to help enable other development (as part of a mixed use community including skilled employment opportunities). If Tipner West was to no longer be a strategic site allocation, the Council would need to find alternative location(s) for 3,500 new homes and 59,000sq m of employment floorspace to meet Portsmouth's growth needs, and the opportunity for a regional marine hub of excellence would be potentially unviable with investment at risk of being drawn away from the City. Without the investment derived from regeneration to support flood defence infrastructure there is likely to

be adverse impact from flood risk to existing uses and habitat on the western part of Tipner.

Option 1: Sustainable New Community - Masterplanning Principles

7.2.13 The following sets the draft principles and requirements for Option 1 for the Tipner peninsular in more detail.

Figure 27. Tipner Option 1 - Sustainable Community



7.2.14 If the option for a substantial new development area is to be progressed, the new community for Tipner would need to be of the highest standard both for the environment and future residents

7.2.15 Development would need to create buildings, layouts and spaces of the highest quality which promote a sense of place, interact with one another, achieve inclusive and accessible design, are resilient and which weave green infrastructure into the fabric of the built environment, including providing links to the Green Corridors as proposed in *Policy G2: Green Infrastructure*. A masterplan will be expected to demonstrate how this will be achieved for each phase of the development, through design codes for layouts, streets and buildings including building heights and materials.

7.2.16 Proposals would need to provide the essential infrastructure needed to support the development of the new community. This could potentially include education and medical facilities such as nursery's, doctors, dentists or pharmacy's, as well as community spaces such as halls for use by community groups and clubs. Facilities should be multi-use where possible to widen their benefits to the

community. Proposals will need to explore the need for facilities and opportunities to integrate them into the development.

7.2.17 Development would also required to address flood risk. A significant portion of the proposed allocation area lies within the present day Flood Zone 3, with additional areas to the south and south-east of the site located within Flood Zone 2, including access and egress along Tipner Lane. Over the next 100 years, the majority of the site is projected to will fall into Flood Zone 3, due to climate related sea level rise. There is also a 'low' risk of surface water flooding interspersed throughout the site area with some areas of medium risk. Flood risk would need to be address in-line with *Policy G5: Flood risk and Drainage*.

7.2.18 The development of a highly sustainable new community would be expected to demonstrate the following principles:

- A **development founded upon principles of ecosystem services**, demonstrating a synergy between human and natural habitats and species at all levels;
- Maximise opportunities to **reduce the use of natural resources** through a fabric-first approach, potentially including passive solar design, passive cooling and implementing water efficiency measures in accordance *Policy D2: Sustainable Design and Construction*.
- Low or zero-carbon development (at all stages of construction and preliminary works) incorporating both **decentralised low carbon infrastructure** such as solar panels and ground/air - source heat pumps, as well as exploring the potential for district heating in-line with *Policy D4: Carbon Neutral and Low Carbon Development*.
- Provision of **sufficient public open space** for the needs of future residents including potentially at the Horsea Island Country Park, in-line with *Policy C2: Outdoor Space and Recreation*.
- Creating routes throughout the scheme which are well connected to one another and the wider urban area forming a **network of attractive, accessible, legible and safe routes**¹¹¹ for all users and which maximise opportunities for natural surveillance and connections with green and blue infrastructure (See *Policy G2: Green Infrastructure*).
- **Encouraging modal shift away from the private car** improving localised air quality in-line with *Policy C3: Sustainable Transport*;
- Prioritising pedestrian and cycle access throughout the site including the creation of a **public walking and cycle access to the whole of the new waterside frontage** of the development;
- **Improved pedestrian, cycle and public transport connectivity** to the City Centre, International Port, rail and ferry connections and wider key destinations, in order to promote sustainable travel patterns in the wider city, improve air quality and deliver the economic benefits of closely linked growth areas.

¹¹¹ Including links to the routes in the Council's draft *Local Walking and Cycling Infrastructure Plan (2020)*

- **Protection and enhancement of heritage assets** and their setting including the investigation, recording and safeguarding of known and/or potential finds of archaeological significance.
- **Integrating public art into the development**, creating spaces that give ownership to residents both of the new development and the wider city.
- **Mitigate and remediate contamination** from current and historic uses including scrapyards and firing range.

Option 1: Sustainable New Community - Area Specifics

Tipner East

- 7.2.19 Proposals by the Tipner Regeneration Company and Homes England have previously been granted planning permission for 626 homes at Tipner. While some land remediation work has taken place, the permission has not be further progressed to date. New development proposals are expected from landowners with an increased number of new homes to improve scheme viability. Current estimates suggest that Tipner East could potentially accommodate a higher density of development for up to 700 dwellings.
- 7.2.20 Proposals for Tipner East would need to provide safe vehicular access and highways mitigation where necessary. Current proposals indicate that the site would be accessed from Northern Parade.

Tipner West

- 7.2.21 Tipner West development area would comprise the existing land area to the west of the M275 and potentially 27ha of land reclaimed from Portsmouth Harbour. It is anticipated that enlarged area would be able to accommodate around 3,500 dwellings, support 58,000sqm of marine employment (across Tipner West and Horsea Island), 2-form entry primary education (including nursery provision), hotel accommodation, aprox. 12,000sqm of commercial uses/ offices, 4.500sq m retail or food and beverage provision and 2,500sqm community and healthcare facilities. A new bridge would be required to provide to Horsea Island to include segregated bus way and active travel connectivity.
- 7.2.22 However, for this to be achieved, the proposed land reclamation would need to be acceptable in terms of the requirements of the *Habitats Regulations* due to the significant loss and impact upon the Portsmouth Harbour SPA habitat.
- 7.2.23 For this option to be progressed further by the Council, and included in the final draft of the Local Plan for further consultation, the applicant would need to demonstrate that the proposal it is capable of meeting a number of sequential steps as part of the legal tests of the Habitat Regulations.
- 7.2.24 The decision by the 'competent authority' which, by reason of the proposed land reclamation, would include not just Portsmouth City Council as the local planning authority, but also the Secretary of State and Marine Management Organisation

(MMO) in consultation with the relevant regulatory bodies, would need to go through the following steps for an 'Appropriate Assessment' of the proposal:

- Satisfy itself that there are no alternative solutions to the plan or project.
- Take a decision as to whether the plan or project must be carried out for imperative reasons of over-riding public interest (IROPI) (subject to certain criteria); and
- Satisfy itself that necessary compensatory measures which ensure that the overall coherence of the national site network and Ramsar site designation is protected, have been secured.

7.2.25 This means that if evidence cannot be provided to a level which satisfies the competent authority, the land reclamation scheme would not be able to proceed.

7.2.26 Development would need to ensure safe access for vehicles using Junction 1 of the M275, including passenger vehicles and buses using the expanded Park and Ride. Opportunities for a vehicular link between the junction and the A3 at Northern Parade should be explored.

7.2.27 Proposals would need to be able to accommodate or find an alternative suitable location for the Harbour SEN School that currently occupies part of the site.

7.2.28 Development would also need to consider the retention and enhancement of the Grade 2 Listed former munitions magazines on the northern side of the peninsula.

Horsea Island

7.2.29 Horsea Island development area site has the potential to deliver a mix of marine employment if site access can be secured via a new bridge link from Tipner West. This infrastructure would need to be in place to enable the delivery of the site and would accommodate all traffic accessing the site. There would be on-ward access to Port Solent for buses, pedestrians and cycles only, via a rapid bus route to the south of the Horsea Island Country Park area.

7.2.30 The Horsea Country Park former landfill site is in the process of being made suitable for public use. It is anticipated to be able to provide a strategic recreational opportunity and informal open space, not just for the proposed development at Tipner but for the city as a whole.

7.2.31 Proposals for Horsea Island would need to ensure the protection of the historic D Day land slipways on the southern shoreline of the site. Development should also take account the location for the Elm Cultivar Trial, managed by the Hampshire Wildlife Trust, to protect White Letter Hairstreak Butterflies.

DRAFT STRATEGIC POLICY S2: TIPNER (OPTION 1)

7.2.32 If Option 1: Sustainable Community is progressed for Tipner, below is draft policy detailing the outline requirements for the development of Option 1, including the level and type of development to be delivered, development principles and criteria.

7.2.33 **Development at Tipner provides a once in a generation opportunity to create a new community in Portsmouth.** The opportunity exists for comprehensive development at Tipner to have an inspiring and positive impact upon the city, how it is perceived upon arrival and how it sets a positive course for the future. A new marine employment 'hub of excellence' of regional significance is to be delivered, making use of both unique locational and deep water access to deliver a range of marine sector employment and skilled learning opportunities for the residents of the City and beyond.

Option 1 Policy S2: Tipner

A successful new community at Tipner should reflect the highest standards both for the environment and future residents

The creation of a new community will need to consist of buildings, layouts and spaces of exemplar design quality, which promote a sense of place, achieve inclusive and accessible design, deliver resilient and low or zero-carbon 'fabric first' development and which weave green and blue infrastructure into the built environment. Proposals will need to be supported by appropriate site phasing and sequencing strategies that optimise efficiency of development, environmental mitigation, movement and amenity conditions throughout the construction phase.

Proposals will need to look to break down the barriers both physical and perceived created by the M275 motorway, and Ports Creek, using design of both buildings and spaces, to create good connections between the sites and into the wider built up area.

Land at Tipner East is allocated for: 700 dwellings; an expanded Park and Ride to accommodate a total of 2,650 spaces; and ancillary employment, community and limited commercial/convenience retail development. Planning permission will be granted where it can be demonstrate that:

- a) Proposals would allow for pedestrian and cycle access to the length of the Harbourside, combining with a network of green and blue infrastructure and allowing for public views through to the harbour;
- b) Suitable and safe vehicular access can be secured to the site from Tipner West;
- c) Decentralised and renewable/low carbon energy infrastructure is incorporated, if possible linked with development at Tipner West;
- d) Land is safeguarded for the future function and expansion of the Park and Ride facility.

Land at Tipner West (including the potential land to be reclaimed from Portsmouth Harbour) is allocated for:

- e) Around 3,500 dwellings
- f) 27,730sq m of marine employment
- g) Primary education (including nursery provision)
- h) Hotel accommodation
- i) 12,000sqm commercial/offices
- j) 4,500sqm retail / food and beverage
- k) 2,500sqm community and healthcare facilities
- l) Creation/ enhancement of deep water access at Tipner Point

Planning permission will be granted where it can be demonstrated that:

- a) Land reclamation proposals mitigate and, where necessary, compensate for likely significant effects to international, national and local habitat designations)¹¹², with particular regard to Brent Geese and wader terrestrial and inter-tidal habitats;
- b) Net biodiversity gain of at least 15% is demonstrated;
- c) A framework of development design codes for the site can be secured, having regard to the NPPF and proposed National Model Design Code;
- d) A range of house typologies and tenures are provided, including senior living accommodation and options for self-build and custom build, build-to-rent, co-living and other housing tenures subject to market demand and assessed needs;
- e) A substantial majority of the site remains permanently 'car free' and Mobility as a Service (MaaS) and sustainable travel modes are prioritised;
- f) Suitable and safe vehicular access can be secured to the site from the M275;
- g) A route is safeguarded for Bus Rapid Transit between Tipner West and Horsea Island via a new bridge link;
- h) It secures improved pedestrian, cycle and public transport connectivity to the City Centre, International Port, rail and ferry connections and wider destinations to the south;
- i) Proposals allow for priority pedestrian and cycle routes for the length of the Harbourside, including views through the site to the harbour and beyond;
- j) Proposals retain, record and enhance designated and undesignated heritage assets on site wherever feasible, including the historic Grade II Listed magazines and site archaeology, in accordance with a framework heritage strategy;
- k) Appropriate identification and remediation of historic land contamination, including unexploded ordnance, will be undertaken;
- l) Flood defence measures are provided in line with robust climate change scenarios;
- m) Navigation routes through Portsmouth Harbour and beneath the M275 motorway are protected;
- n) Decentralised and renewable/ low carbon energy infrastructure is incorporated, if possible providing future connection opportunities for Tipner East, Horsea Island East and other appropriate locations, in line with a site-wide *Energy Strategy*;

¹¹² 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.

- o) The development would accommodate sufficient public open space (include children's playspace) to provide for the needs of future residents including at the Horsea Island Country Park;
- p) A strategy for the long term community ownership and stewardship of land and assets is submitted and secured;
- q) Strategy and implementation plan for incorporating public art into the development.

Horsea Island

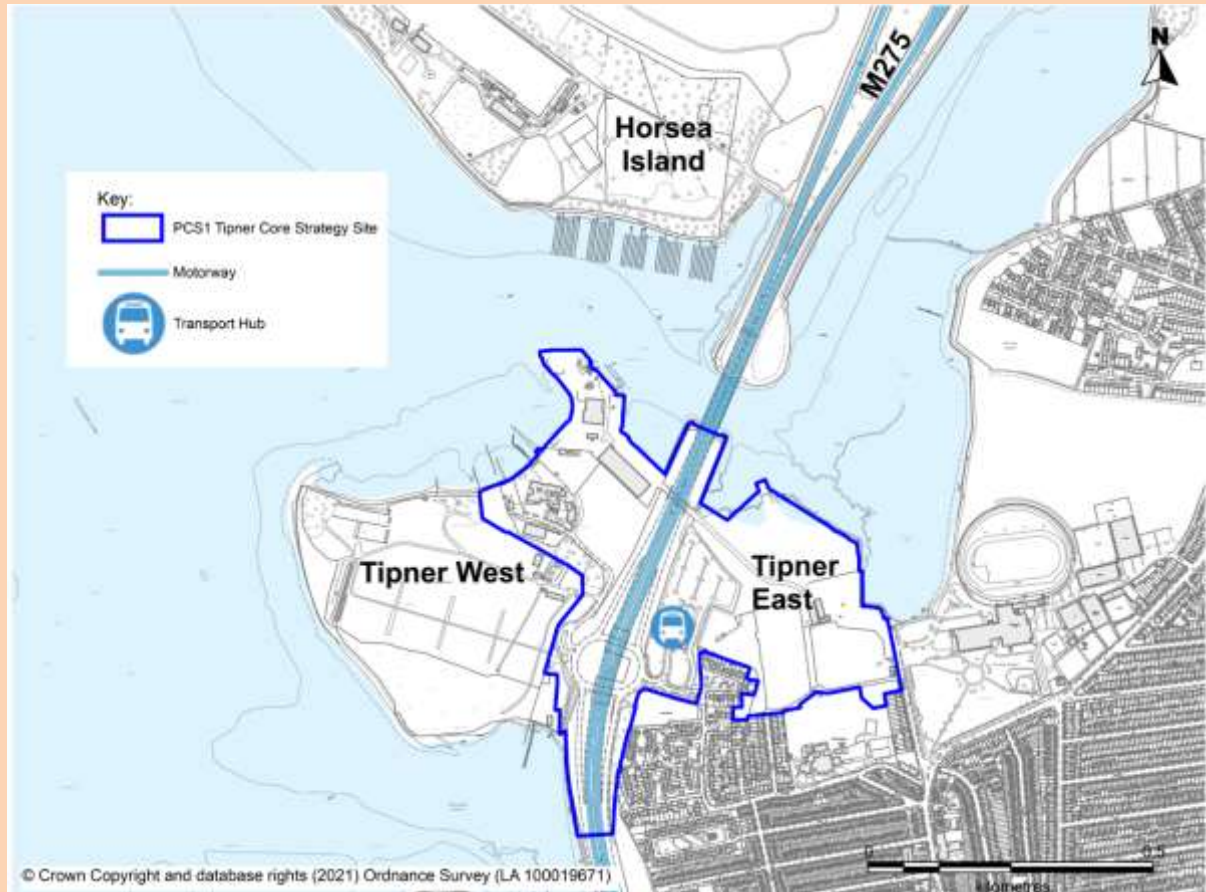
Land at Horsea Island is allocated for 30,270sqm of Marine Employment. Planning permission will be granted where it can be demonstrated that:

- r) Suitable vehicular access can be secured to the site from the M275, via the proposed bridge link to Tipner West
- s) A route is safeguarded for Bus Rapid Transit between the bridge to Tipner West and through the site to the Horsea Island Country Park and Port Solent.
- t) Pedestrian and cycle access is provided for the length of the Harbourside and to the Horsea Island Country Park.
- u) Suitable mitigation or re-provision is provided for any loss of habitat on site including the trial area for the White Letter Hairstreak Butterfly / Elm Cultivars.
- v) Proposals can satisfactorily mitigate any impacts on protected habitats and species (inc. White Letter Hairstreak Butterfly trail area);
- w) Proposals have regard to the D-Day embarkation ramps on the southern shore of Horsea Island as part of a site-wide heritage strategy;

Option 2: Regeneration of Existing Area - Masterplanning Principles

7.2.34 The following sets the draft principles and requirements for Option 2 for the Tipner peninsular in more detail.

Figure 28 Tipner Option 2 - Regeneration of Existing Area



- 7.2.35 Development would need to create buildings, layouts and spaces of the highest quality which promote a sense of place, interact with one another, achieve inclusive and accessible design, are resilient and which weave green infrastructure into the fabric of the built environment, including providing links to the Green Corridors as proposed in *Policy G2: Green Infrastructure*. A masterplan will be expected to demonstrate how this will be achieved for each phase of the development, through design codes for layouts, streets and buildings including building heights and materials.
- 7.2.36 Proposals would need to support the essential infrastructure needed to support the development of the community. This could potentially include contributions towards the redevelopment / improvement of existing community facilities and infrastructure off site including education and medical facilities, as well as community spaces and the drainage and electricity capacity of the city.
- 7.2.37 Development would also be required to address flood risk. A significant portion of the proposed allocation area lies within the present day Flood Zone 3, with additional areas to the south and south-east of the site located within Flood Zone

2, including access and egress along Tipner Lane. Over the next 100 years, the majority of the site is projected to fall into Flood Zone 3, due to climate related sea level rise. There is also a 'low' risk of surface water flooding interspersed throughout the site area with some areas of medium risk. Flood risk would need to be address in-line with *Policy G5: Flood risk and drainage*.

- 7.2.38 The development of Tipner is expected to meet the design, sustainability and construction standards described in *Policy D1: Design* and *Policy D2 Sustainable Design and Construction*.

Option 2: Regeneration of Existing Area - Area Specifics

Tipner East (unaltered compared to Option 1)

- 7.2.39 Proposals by the *Tipner Regeneration Company* and *Homes England* have previously been granted planning permission for 626 homes at Tipner. While some land remediation work has taken place, the permission has not be further progressed to date. New development proposals are expected from landowners with an increased number of new homes to improve scheme viability. Current estimates suggest that Tipner East could potentially accommodate a higher density of development for up to 700 dwellings.
- 7.2.40 Proposals for Tipner East would need to provide safe vehicular access and highways mitigation where necessary. Current proposals indicate that the site would be accessed from Northern Parade.

Tipner West

- 7.2.41 In line with the existing adopted Portsmouth Plan Core Strategy the additional land allocation at Tipner West would support approx. 800 homes, 25,000 sq m of employment space and community facilities, if the necessary enabling infrastructure was put in place. Since the adoption of the 2012 *Portsmouth Plan Core Strategy* further investigation into the nature of the supporting infrastructure, particularly in respect of access and green infrastructure has been undertaken. The development must be carried out in such a way that the nature conservation interests are protected and enhanced. The regeneration of the existing site would need to be acceptable in terms of the requirements of the Habitats Regulations due to the impact upon the Portsmouth Harbour SPA habitat.
- 7.2.42 For this option to be progressed further by the Council, and included in the final draft of the Local Plan for further consultation, the applicant would need to demonstrate that the proposal it is capable of meeting a number of sequential steps as part of the legal tests of the Habitat Regulations.
- 7.2.43 Development would need to ensure safe access for vehicles using Junction 1 of the M275, including passenger vehicles and buses using the expanded Park and Ride. Opportunities for a vehicular link between the junction and the A3 at

- 7.2.44 Northern Parade should be explored. Development will also be required to ensure it does not prejudice any future opportunity to provide an additional bridge between Tipner and Horsea Island.
- 7.2.45 Development would need to mitigate and remediate contamination from current and historic uses including scrapyards and firing range.
- 7.2.46 Development would also need to consider the retention and enhancement of the Grade 2 Listed former munitions magazines on the northern side of the peninsula.

Horsea Island

- 7.2.47 No employment development would be proposed on Horsea Island and a new bridge link between Tipner West and Horsea Island would not be required. The Horsea Country Park former landfill site is in the process of being made suitable for public use. It is anticipated to be able to provide a recreational opportunity and informal open space, but its benefit would be largely limited to those in Port Solent and those able to access the site by private car due to its inaccessibility.

DRAFT STRATEGIC POLICY S2: TIPNER (OPTION 2)

- 7.2.48 If *Option 2: Regeneration of Existing Area* is progressed for Tipner the Council would need to find a suitable location for the remaining 2,700 homes and 34,000 sq m of employment floorspace to meet both Government's housing target for Portsmouth and the assessed need for employment space to support economic growth and the marine and maritime sector (and associated sectors) within the region. Policy specific viability testing will also need to be carried out to ensure the necessary enable works and infrastructure, such as flood defence and land remediation and deliverable with this level of development. Below is draft policy detailing the outline requirements for the development of Option 2, including the level and type of development to be delivered, development principles and criteria.

Option 2 Policy S2: Tipner

The aim is to revitalise the Tipner area transforming it from an underused, derelict site to a thriving community creating a new gateway for the city.

Proposals will need to look to break down the barriers both physical and perceived created by the M275 motorway, and Ports Creek, using design of both buildings and spaces, to create good connections between the sites and into the wider built up area.

Land at Tipner East is allocated for: 700 dwellings; an expanded Park and Ride to accommodate a total of 2,650 spaces; and ancillary employment, community and limited commercial/convenience retail development. Planning permission will be granted where it can be demonstrate that:

- a) Proposals would allow for pedestrian and cycle access to the length of the Harbourside, combining with a network of green and blue infrastructure and allowing for public views through to the harbour;
- b) Suitable and safe vehicular access can be secured to the site from Tipner West;
- c) Decentralised and renewable/low carbon energy infrastructure is incorporated, if possible linked with development at Tipner West;
- d) Land is safeguarded for the future function and expansion of the Park and Ride facility.

Land at Tipner West is allocated for:

- e) Around 800 dwellings
- f) 25,000sq m gross of employment
- g) Supporting infrastructure

Planning permission will be granted where it can be demonstrated that:

- h) Proposals mitigate and, where necessary, compensate for likely significant effects to international, national and local habitat designations)¹¹³, with particular regard to Brent Geese and wader terrestrial and inter-tidal habitats;
- i) A design code/s for the site can be secured, having regard to the NPPF and proposed National Model Design Code, ensuring account is taken of viewpoints and the wider visual impact across Portsmouth harbour and taking advantage of the sites waterside location and this key gateway to the city;
- j) A range of house typologies and tenures are provided, including senior living accommodation and options for self-build and custom build, build-to-rent, co-living and other housing tenures subject to market demand and assessed needs;
- k) Suitable and safe vehicular access can be secured to the site from the M275;

¹¹³ 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.

- l) A route and land is safeguarded for Bus Rapid Transit between Tipner West and Horsea Island via a new bridge link;
- m) It secures improved pedestrian, cycle and public transport connectivity to the City Centre, International Port, rail and ferry connections and wider destinations to the south;
- n) Proposals provide public open space (include children's playspace) to provide for the needs of future residents with access to the waterfront, if this can be achieved without an adverse effect on the ecological integrity of Portsmouth Harbour;
- o) Proposals retain, record and enhance designated and undesignated heritage assets on site wherever feasible, including the historic Grade II Listed magazines and site archaeology;
- p) Appropriate identification and remediation of historic land contamination, including unexploded ordnance, will be undertaken;
- q) Flood defence measures are provided in line with robust climate change scenarios;
- r) Navigation routes through Portsmouth Harbour and beneath the M275 motorway are protected.

Horsea Island

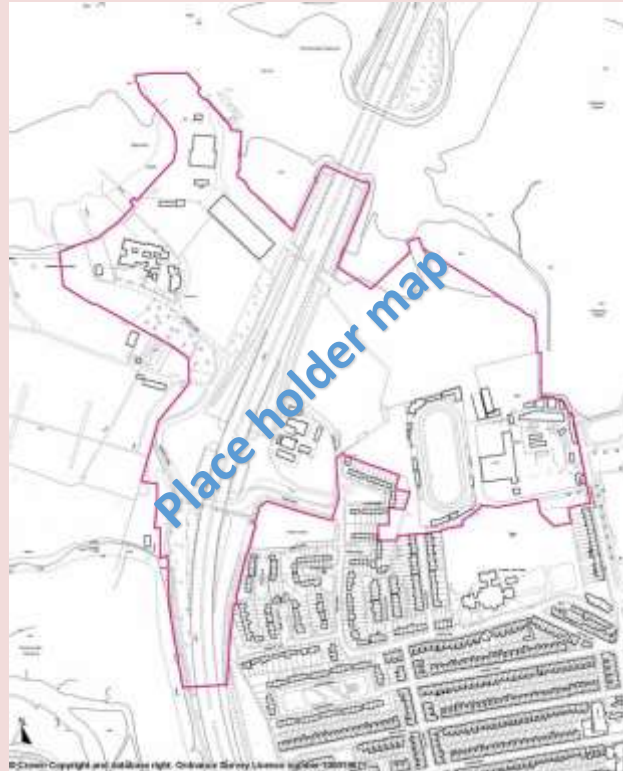
Land at Horsea Island is allocated for public open space. Planning permission in line with this allocation will be granted where it can be demonstrated that:

- s) A route and land is safeguarded for Bus Rapid Transit between the bridge to Tipner West and through the site to the Horsea Island Country Park and Port Solent.
- t) Suitable mitigation or re-provision is provided for any loss of habitat on site including the trial area for the White Letter Hairstreak Butterfly / Elm Cultivars.
- u) Proposals can satisfactorily mitigate any impacts on protected habitats and species (inc. White Letter Hairstreak Butterfly trail area);
- v) Proposals have regard to the D-Day embarkation ramps on the southern shore of Horsea Island.

Option 3: Maintain (no strategic scale development at Tipner West - Masterplanning Principles

7.2.49 The following sets the draft principles and requirements for Option 3 for the Tipner peninsular in more detail.

Figure 29 Tipner Option 3 - Maintain (no strategic scale development at Tipner West)



- 7.2.50 Development at Tipner East would need to create buildings, layouts and spaces of the highest quality which promote a sense of place, interact with one another, achieve inclusive and accessible design, are resilient and which weave green infrastructure into the fabric of the built environment, including providing links to the Green Corridors as proposed in *Policy G2: Green Infrastructure*. A masterplan will be expected to demonstrate how this will be achieved for each phase of the development, through design codes for layouts, streets and buildings including building heights and materials.
- 7.2.51 Proposals at Tipner East would need to support the essential infrastructure needed to support the development of the community. This could potentially include contributions towards the redevelopment / improvement of existing community facilities and infrastructure off site including education and medical facilities, as well as community spaces and the drainage and electricity capacity of the city.
- 7.2.52 Development would also be required to address flood risk. A significant portion of the proposed allocation area lies within the present day Flood Zone 3, with additional areas to the south and south-east of the site located within Flood Zone 2, including access and egress along Tipner Lane. Over the next 100 years, the

majority of the site is projected to will fall into Flood Zone 3, due to climate related sea level rise. There is also a 'low' risk of surface water flooding interspersed throughout the site area with some areas of medium risk. Flood risk would need to be address in-line with *Policy G5: Flood risk and drainage*.

- 7.2.53 The development of Tipner East is expected to meet the design, sustainability and construction standards described in *Policy D1: Design* and *Policy D2: Sustainable Design and Construction*.

Option 3: Maintain (no strategic scale development at Tipner West) - Area Specifics

Tipner East (unaltered compared to Option 1)

- 7.2.54 Proposals by the *Tipner Regeneration Company* and *Homes England* have previously been granted planning permission for 626 homes at Tipner. While some land remediation work has taken place, the permission has not be further progressed to date. New development proposals are expected from landowners with an increased number of new homes to improve scheme viability. Current estimates suggest that Tipner East could potentially accommodate a higher density of development for up to 700 dwellings.
- 7.2.55 Proposals for Tipner East would need to provide safe vehicular access and highways mitigation where necessary. Current proposals indicate that the site would be accessed from Northern Parade.

Tipner West

- 7.2.56 No specific development is allocated at Tipner West, and all development proposals will be assessed under the relevant policies of this Local Plan.
- 7.2.57 It should be noted that polices of particular relevance are considered to be *Policy G5: Flood Risk and drainage* due to the flood risk at the site, *Policy G4: Contaminated Land* due to current and historic uses including scrapyards and firing range, and *Policy D5: Heritage and Archaeology* and *Policy D6: Heritage Enhancements* due to the presence of the Grade 2 Listed former munitions magazines on the northern side of the peninsula.
- 7.2.58 Development proposals will also be expected to seek to avoid prejudicing any future opportunity to provide an additional bridge between Tipner and Horsea Island.

Horsea Island

- 7.2.59 No employment development would be proposed on Horsea Island and a new bridge link between Tipner West and Horsea Island would not be required. The Horsea Country Park former landfill site is in the process of being made suitable for public use. It is anticipated to be able to provide a recreational opportunity and informal open space, but its benefit would be largely limited to those in Port Solent and those able to access the site by private car due to its inaccessibility.

- 7.2.60 If *Option 3: Maintain (No strategic development at Tipner West)* is progressed for Tipner the Council would need to find a suitable location for the remaining 3,500 new homes and 59,000sq m of employment floorspace to meet both Government's housing target for Portsmouth and the assessed need for employment space to support economic growth and the marine and maritime sector (and associated sectors) within the region. Further work would also be required to identify other sources of funding for necessary minimum work for flood defence infrastructure to protect existing land uses and habitats at Tipner West. Below is draft policy detailing the outline requirements for the development of Option 3, including the level and type of development to be delivered, development principles and criteria.

Option 3 Policy S2: Tipner

The aim is to revitalise the eastern Tipner area transforming it from an underused, derelict site to a thriving community creating a new gateway for the city.

Land at Tipner East is allocated for: 700 dwellings; an expanded Park and Ride to accommodate a total of 2,650 spaces; and ancillary employment, community and limited commercial/ convenience retail development. Planning permission will be granted where it can be demonstrate that:

- a) Proposals would allow for pedestrian and cycle access to the length of the Harbourside, combining with a network of green and blue infrastructure and allowing for public views through to the harbour;
- b) Decentralised and renewable/low carbon energy infrastructure is incorporated,
- c) Land is safeguarded for the future function and expansion of the Park and Ride facility.

Horsea Island

Land at Horsea Island is allocated for public open space. Planning permission in line with this allocation will be granted where it can be demonstrated that:

- d) A route and land is safeguarded for Bus Rapid Transit between the bridge to Tipner West and through the site to the Horsea Island Country Park and Port Solent.
- e) Suitable mitigation or re-provision is provided for any loss of habitat on site including the trial area for the White Letter Hairstreak Butterfly / Elm Cultivars.

- f) Proposals can satisfactorily mitigate any impacts on protected habitats and species (inc. White Letter Hairstreak Butterfly trail area);
- g) Proposals have regard to the D-Day embarkation ramps on the southern shore of Horsea Island.

Implementation (Option 1)

The Council's is working closely with landowners and agents to progress development at Tipner and ensure the best outcome for the city, its people and its natural environment.

Tipner is being brought forward under the Council's stewardship in-line with its the '30 year vision' for the development, in order to create the best outcomes for both residents of the new community as well as residents of the wider city as a whole.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
✓	✓		✓	✓	✓

Monitoring (Option 1)

Policy Aim	Key Indicator
➤ Creation of a new exemplar maritime community for the city.	- Grant of planning permission(s) and progress towards site delivery
➤ Delivery of the type and quantum of development listed.	- Permissions and completions

Implementation (Option 2)

The Council's is working closely with landowners and agents to progress development at Tipner and ensure the best outcome for the city, its people and its natural environment.

Tipner would be brought forward under the Council's stewardship in-line with good practice, in order to create the best outcomes for both residents of the new community as well as residents of the wider city as a whole.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
			✓		✓

Monitoring (Option 2)

Policy Aim	Key Indicator
➤ Delivery of the type and quantum of development listed.	- Permissions and completions

Implementation (Option 3)					
<p>The Council's is working closely with landowners and agents to progress development at Tipner East and ensure the best outcome for the city, its people and its natural environment.</p> <p>Tipner East is being brought forward under the Council's stewardship in-line with good practice, in order to create the best outcomes for both residents of the new community as well as residents of the wider city as a whole.</p>					
National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
			✓		✓
Monitoring (Option 3)					
Policy Aim			Key Indicator		
➤ Delivery of the type and quantum of development listed.			- Permissions and completions		

Further Information:

- PCC Tipner website: <https://tipnerwest.portsmouth.gov.uk>

Question 39. Tipner development options

What should the approach be to the future of Tipner?

a. Option 1. Innovative Sustainable Community (inc. land reclamation)

If you support this option, do you agree with the outline principles and requirements for development? If not what changes would you suggest and why?

b. Option 2. Regeneration of Existing Area (Portsmouth Core Strategy allocation)

If you support this option, do you agree with the outline principles and requirements for development? If not what changes would you suggest and why? And where instead should the other 2,700 homes and 34,000 sq m of employment floorspace required be located?

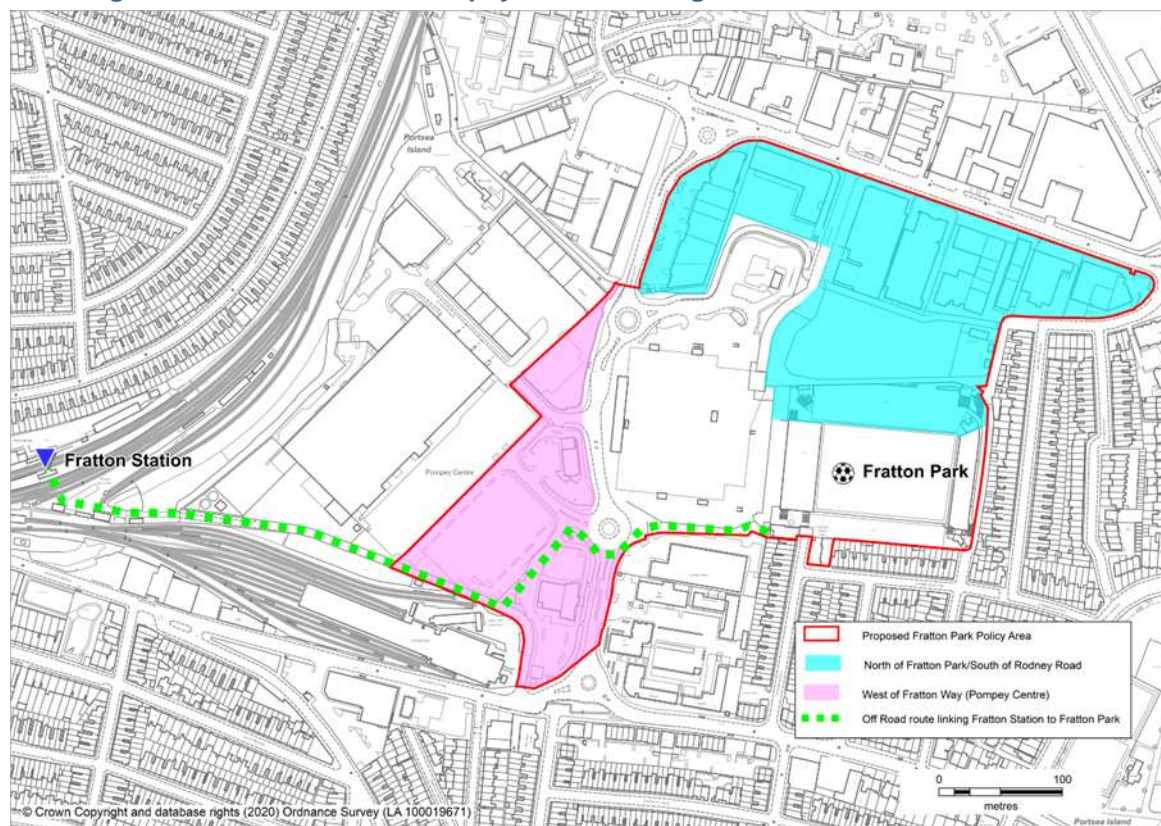
c. Option 3. Maintain (no strategic scale development)

If you support this option, do you agree with the outline principles and requirements for development? If not what changes would you suggest and why? And where instead should the 3,500 homes and 59,000sq m of employment floorspace required be located?

d. Are there any other options for development at Tipner that the Council should consider?

7.3 Fratton Park and the Pompey Centre (Policy S3)

Figure 30- Fratton Park & Pompey Centre Strategic Site Allocation



- 7.3.1 Fratton Park has been the home of Portsmouth Football Club since 1899; its setting in the heart of the city and its historic structure (the south stand is part of the original stadium) mean the site and its activities play an important cultural role in the city's identity.
- 7.3.2 The football ground is partly surrounded by an area of warehouse style retail and trade units (including The Pompey Centre) with residential areas to the east and south. The Pompey Centre to the south-west of the stadium includes some large superstore units, hotel and residential development fronting Goldsmith Avenue with extensive surface car parking, much of which is currently underutilised.
- 7.3.3 However, the capacity of the grounds and the physical infrastructure for getting fans to and from the site is currently insufficient, causing congestion during peak arrival / departing periods. The site is also bisected by Rodney Road which is one of the main thoroughfares for the city. This road and the adjacent railway line prevent easy pedestrian and cycle movement to and through the site and the area is dominated by a car-based layout. This leaves a bland, unintuitive public realm for pedestrians with no notable green space or features.

Why is this policy needed?

- 7.3.4 Expansion of the football stadium would present an opportunity to optimise the use of the surrounding area, provide high quality new mixed use development and improve the visitor experience at one of the city's key attractions.
- 7.3.5 The provision of high quality leisure and recreation facilities, local employment opportunities and additional new homes are essential to support well-being and future growth in the city.
- 7.3.6 **North of the North Stand, South of Rodney Road**
Portsmouth FC has expressed aspirations to expand its seating capacity from 25,000 to 30,000, with a redeveloped north stand being the preferred option for expansion; this would utilise the area of existing car parking to the north of the ground and potentially incorporate supporting development in the form of a hotel and/ or conference centre provision and small scale food and beverage offer. 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 (500 dwellings) development with potential for small scale commercial/ leisure uses.
- 7.3.7 **The Pompey Centre**
The Pompey Centres includes significant surface level parking and some large retail floorplates (B&Q store) that are currently underutilised. Redevelopment and/ or re-orientation of the site layout could support a higher density of development. There is considered to be potential for a residential-led mixed use development to the south of the site fronting Fratton Way/ Goldsmith Avenue (A2030) continuing the frontage of residential development on the eastern side of Fratton Way, and/ or further retail/ commercial space to support the retail park.
- 7.3.8 It is considered that this southern area of the Pompey Centre may become available in the later stages of the redevelopment of the area and could support approximately 250 dwellings with ground floor retail/ commercial or employment uses.
- 7.3.9 Any pedestrian through route from train station to football stadium, via the Pompey Centre, should maximise opportunities to provide a high quality public realm and green infrastructure provision, and with small scale commercial uses as appropriate.

7.3.11 **Improving access to Fratton Park from Fratton Station**

The access/ egress along Goldsmith Avenue (A2030), used by a significant number of fans to access the ground from Fratton train station, is one of the main east/ west vehicle routes through the city with narrow pavements, causing congestion and potential conflicts for all users. The parking area immediately adjacent to the grounds is also limited, leading to parking in the surrounding residential areas and congestion on both the immediate access roads (Anson Road/ Rodney Road) and connecting routes into the city.

- 7.3.12 Improvement of public transport links to and from the ground will be a key issue to address to support any expansion of the stadium and associated development. The development of a new direct pedestrian link from Fratton Station, would be required to significantly reduce the pedestrian use of Goldsmith Avenue. A potential route across land currently owned by Network Rail and the Pompey Centre has been identified (as shown in Figure 30) early engagement with all parties has indicated that this is the preferred route based on the current built form of the site, the route may alter as the site develops. The Council would also support any measures to reduce vehicle congestion, such as the use of enhanced park and ride (bus or train) arrangements.

DRAFT STRATEGIC POLICY S3: FRATTON PARK AND THE POMPEY CENTRE

- 7.3.13 Policy S3 aims to enhance Fratton Park's role and contribution to Portsmouth's cultural identity, recreational provision and overall economic development, whilst optimising the development potential of the surrounding area to help support the housing needs of the city. Together, the allocation area could delivery approximately 750 homes.
- 7.3.14 Regeneration of the stadium and wider area would be expected to greatly improve the visitor experience and urban design quality of a key city landmark, including enhancements to public realm, accessibility and the environmental quality of the area. Development would be required to enhance the connectivity of active travel routes, green infrastructure and ecological network routes and provide net gains in their provision (See Policies G1 and G2).
- 7.3.15 The possibility of a potential off-road route, linking Fratton Station and Fratton Park, through the Pompey Centre (shown for illustrative purposes in Figure 28) needs to be maintained.

Fratton Park

The area to the north of Fratton Park (as identified in Figure 28) is considered suitable in principle for: expansion to the north stand of Fratton Park Football Stadium; supporting hotel (Use Class C1) and/ or conference facilities (Use Class F.1); small scale commercial, business or service uses (Use Class E) associated with the Club and stadium; and approximately 500 dwellings.

Development will be granted planning permission where it can be satisfactorily demonstrated that:

- There would be safe access and egress of users from the site, including full exploration of the potential for an off-road pedestrian link from Fratton Train Station to Fratton Park.
- The proposals will result in an increase in the number of fans accessing the ground by walking, cycling and public transport.
- Enhanced off-road pedestrian and cycle route connectivity between the site and surrounding area.
- The provision of underground parking, in order to decrease ground level parking, improve the street scene and create space for fans including sufficient cycle and electric car parking provision, to serve the users of the ground, new residential properties and other facilities.
- There are no significant adverse impacts to local residential amenity from the expanded operation and use of the site.
- Appropriate mitigation is provided for any on and off-site congestion during the construction and subsequent operation of the redeveloped site.

Land west of The Pompey Centre

Development on land to the west of the Pompey Centre (as per Figure 28), would be supported in principle for:

- Approximately 250 residential dwellings with ground floor active uses fronting Fratton Way/ Goldsmith Avenue.
- Additional commercial, business or service use floorspace
- Off-road active travel routes to Fratton Park and surrounding areas, taking account of existing networks, supported by appropriate ancillary development.

Where it can be demonstrated that:

- The potential route linking Fratton Station to Fratton Park (indicated on Figure 28) is safeguarded as a new off-road access to Fratton Park, unless appropriate alternative provision can be made.
- Appropriate mitigation is provided for any on and off-site congestion during the construction and subsequent operation of the redeveloped site.
- Rodney Road, Fratton Way and the wider network can accommodate the proposed increases in levels of traffic.

Policy Implementation

The City Council will seek to work with the landowners forward suitable expansion to the football ground, housing, employment and retail development on whilst securing improvements to address the specific transport constraints related to the football grounds.

Funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
	✓		✓		✓

Policy Monitoring

Policy Aim	Key Indicator
➤ Expansion of the North Stand at Fratton Park to increase capacity to 30,000 spectators	- Grant of Planning Permission
➤ Delivery of approximately 750 homes and supporting tourism, commercial, business and service uses	- Grant of Planning Permission(s) and progress towards site delivery
➤ Creation of new off road pedestrian route linking Fratton Park to Fratton Station	- Securing funding - Grant of Planning Permission

Further Information:

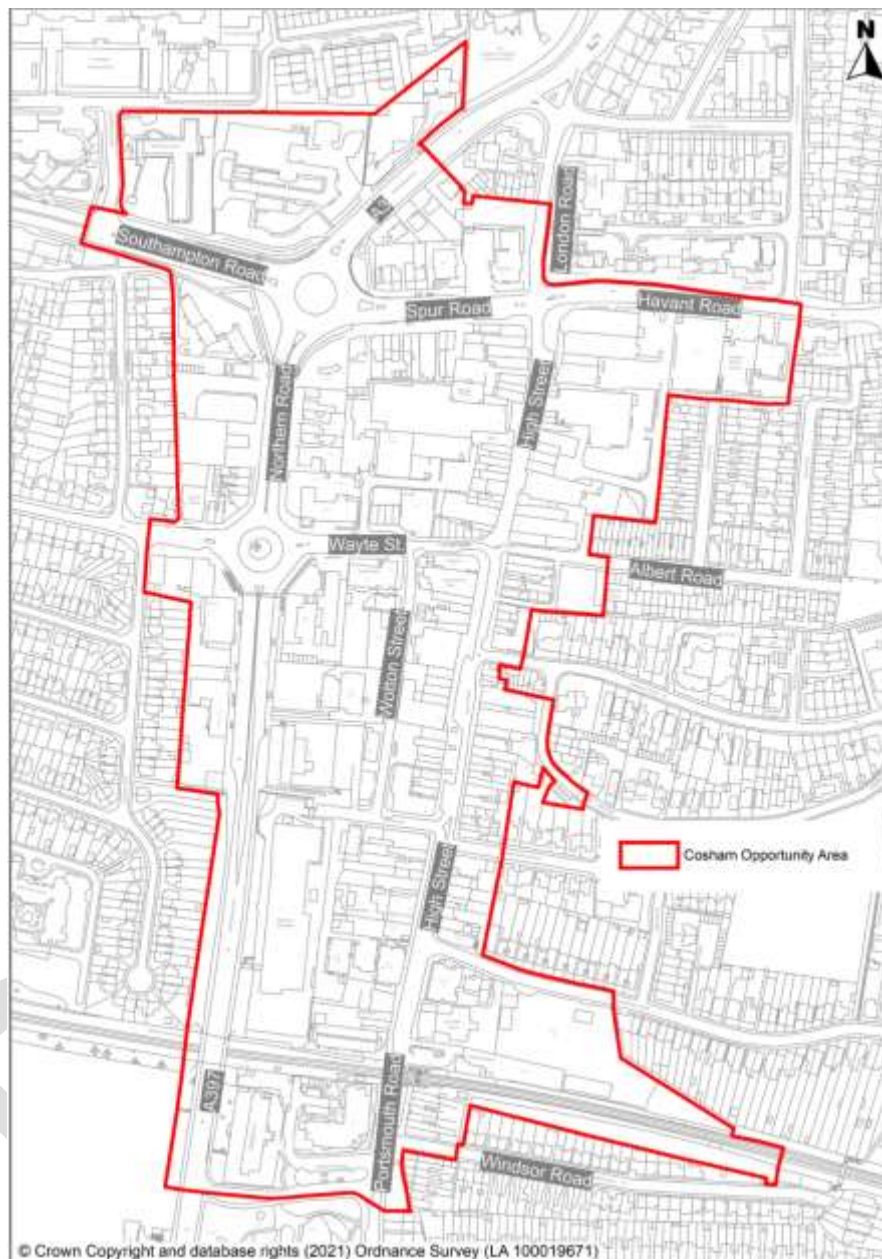
- PCC (2021) *Housing and Economic Land Availability Assessment*

Question 40. Fratton Park and the Pompey Centre

- Do you agree with the proposed approach to Policy S3?
- If not what changes would you suggest and why?

7.4 Cosham (Policy S4)

Figure 31-Cosham Strategic Site



- 7.4.1 The Cosham Strategic Allocation is an identified area of development potential which broadly comprises the Cosham District Centre area and opportunity sites to the north along Southampton Road and London Road. The area currently consists of retail and commercial, food and beverage, offices and employment uses and community uses.
- 7.4.2 Cosham is a highly accessible area, with very good bus and rail links and close proximity to the strategic road network. Cosham District Centre also attracts steady visitor footfall, in part due to it being the only District Centre on the Portsmouth mainland. The area has also been proposed for improvements to bus transport links, as part of the route of the South East Hampshire Rapid Transit

scheme, and for delivering enhancements to consolidate Cosham as a 'transport mobility hub'.

- 7.4.3 Within the site area, there are a number of previously developed and 'brownfield' land plots, most of which could be better optimised for use. In particular, there are a number of buildings in public body ownership along Northern Road (i.e. Cosham Fire Station, Cosham Police Station, Cosham Health Centre, Cosham Community Centre), which offer an opportunity for the City Council to deliver significant regeneration in partnership with the relevant public bodies. This would be enhanced by the significant opportunity for growth and regeneration that may be afforded by the Rapid Transit scheme.

Why is this policy needed?

- 7.4.4 The NPPF states that planning policies should promote the effective use of land in meeting the need for homes and other uses and support the development of under-utilised land and buildings, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategies for addressing growth needs should make as much use as possible of previously-developed or 'brownfield' land.
- 7.4.5 The Council should take a proactive role in identifying and helping to deliver land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.
- 7.4.6 The site area is currently comprised of various separate land parcels in multiple ownership, including by public bodies. It is important to set out a strategic overview of how the area could develop, including consideration of constraints and opportunities, in accordance with national planning policy principles.

DRAFT STRATEGIC POLICY S4: COSHAM

- 7.4.7 Analysis by the Council's HELAA considers that the Cosham site allocation area would be able to deliver around 740 dwellings and 5,000 sq metres of employment floorspace. Housing and employment should be delivered as part of high quality mixed-use development.
- 7.4.8 The redevelopment of existing buildings and land parcels is encouraged to make more efficient use of land, to be comprised of high density housing with community, employment or retail/ commercial uses. Development will also need to conform with the approach to the Cosham District Centre under *Policy E6: Town Centre Strategies* where appropriate. The need to encouraged proposals to

increase the number of homes and employment opportunities within the centre is also reflected in Policy E6 in order to help to support the High Street.

- 7.4.9 Comprehensive redevelopment across more than one land plot may be necessary to achieve better planning outcomes and provide opportunities for improved walking/ cycling connectivity. This is especially relevant for the sites within public body ownership located along the east of Northern Road. In these scenarios, partnership working and/ or joint ventures between relevant public bodies or private landowners is highly recommended in order to effectively co-ordinate and enable delivery of schemes, and to pursue available funding opportunities, such as the One Public Estate programme.
- 7.4.10 Redevelopment also presents an opportunity to bring about significant environmental and social benefits through Green Infrastructure enhancements. Cosham District Centre has been identified as an area to implement the 'Urban Greening Factor' tool, and Northern Road as a 'green corridor', with the aim of delivering net gains in green infrastructure through new development and public realm enhancements. See *Policy G2: Green Infrastructure*.
- 7.4.11 The entirety of the site allocation presently falls within Flood Zone 1 and is therefore considered to be at low risk (less than 1 in 1000 year / 0.1% annual probability) from an extreme tidal flood event. However, climate change projections suggest that some of the site allocation would be in Flood Zone 3 within the next 100 years, though this scenario may change when updated modelling becomes available. Nevertheless, a precautionary approach to flood risk should be taken with a Flood Risk Assessment (FRA) carried out for new development in accordance with *Policy G5: Flood Risk and Drainage* as appropriate.

Policy S4: Cosham

The Cosham Site Allocation Area is considered to be able to deliver approximately 740 dwellings and 5,000 sqm of employment floorspace during the plan period.

Proposals for high-quality mixed-use development, comprised of high density housing with community, employment or retail/ commercial uses, will be supported in principle, where the following can be demonstrated:

- Redevelopment of existing buildings and land plots make the most efficient use of land.
- Maximising opportunities to utilise sustainable transport links, including delivering enhancements towards consolidating Cosham as a 'transport mobility hub', and enhance or create additional green infrastructure.
- New development would be resilient to long term flood risk and incorporate flood risk measures where appropriate.

- Development is in accordance with the vision and development principles for the Cosham District Centre, in *Policy E6: Town Centre Strategies* where applicable.

Policy Implementation

The City Council will seek to work in partnership and/ or joint venture with other public bodies, and/ or if necessary private landowners, to enable the effective delivery and funding opportunities to deliver comprehensive regeneration schemes.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
✓	✓	✓	✓	✓	✓

Policy Monitoring

Policy Aim	Key Indicator
➤ To ensure the redevelopment of Cosham makes the most effective use of land and provides at least 740 dwellings and 5,000 sq metres of employment floorspace with supporting uses.	<ul style="list-style-type: none"> - Planning permissions granted for new housing and employment space within the allocation boundary. - Completions within the allocation boundary.

Further Information

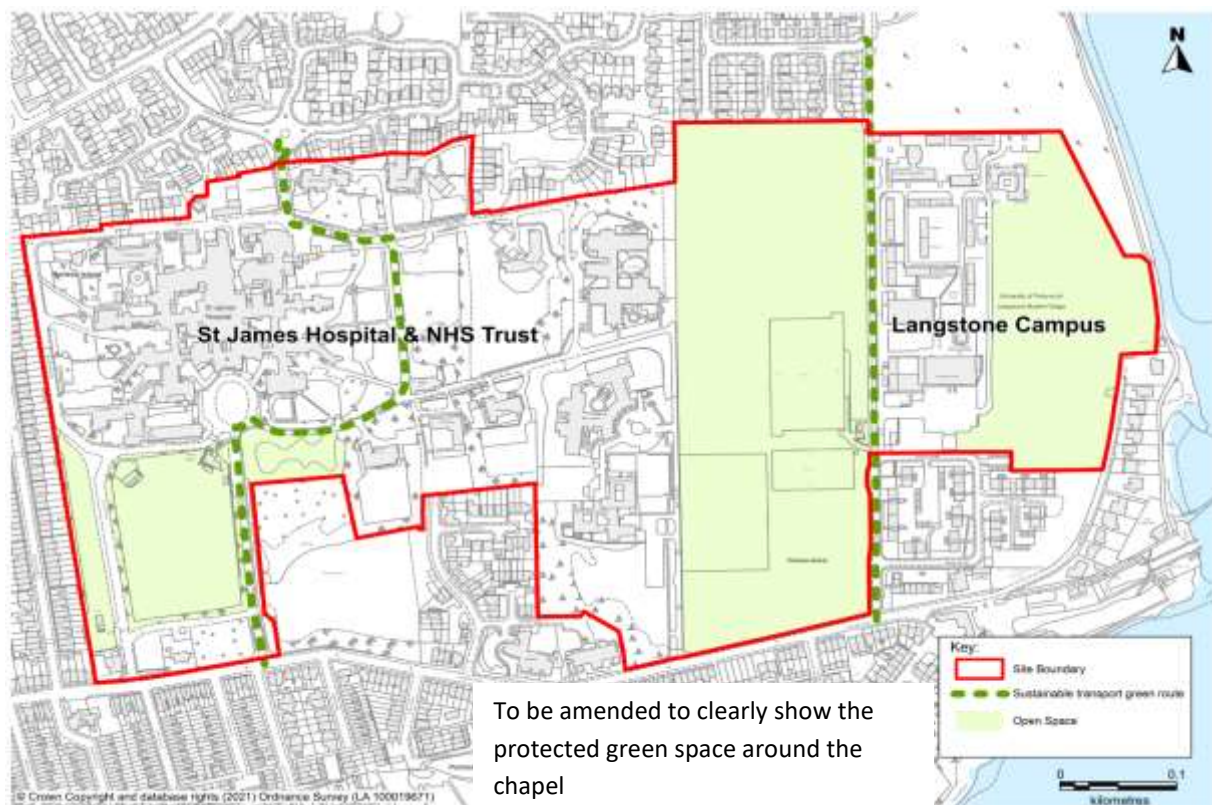
- PCC (2021) *Housing and Economic Land Availability Assessment (HELAA)*
- PCC (2021) *Retail and Town Centres background paper*

Question 41. Cosham

- Do you agree with the proposed approach to Policy S4?
- If not what changes would you suggest and why?

7.5 St James' and Langstone Campus (Policy S5)

Figure 32-Strategic Site at St James' & Langstone Campus



- 7.5.1 The St James' and Langstone Strategic site is located in Milton, an area on the eastern edge of Portsea Island with predominantly a suburban character. The site consists of two main development areas, the first is the listed St James Hospital and its grounds, including the NHS Solent medical campus and the southern part of the site under the control of the HCA including the former harbour school. The second main area is the former Portsmouth University Langstone Campus including university student halls of residence with adjoining playing fields.
- 7.5.2 The site contains a number of significant open spaces including the Cricket Pitch and St James' Green off Solent Drive and the large area of university playing pitches adjoining Langstone and Chichester Harbour. The Solent Waders and Brent Goose Strategy identifies the playing pitches are feeding sites for Brent Geese.
- 7.5.3 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 emerging Neighbourhood Plan.

Why is this policy needed?

- 7.5.4 The site is currently in multiple ownership. This policy presents an opportunity to provide a strategic overview of how the site could develop including consideration of site specific constraints and opportunities. The St James Hospital site was

previously identified in the Portsmouth City Local Plan (2001) under policies MT 2-4.

St James Hospital and Grounds, including NHS and HCA Owned Land

- 7.5.5 St James Hospital comprises a Byzantine Gothic hospital complex set in a wider parkland setting. The grounds of the hospital contains a number of ancillary buildings associated with the former mental hospital and medical use, of particular note is the chapel located to the south east of the main hospital built in the early English style. Designed by George Rake, both date to 1879 and are listed at Grade II. These buildings along with the surrounding landscape including mature trees, open spaces and vistas are the key contextual features for development to respond to. The historic buildings and open spaces which form the setting of the hospital should be incorporated as an integral part of development proposals on the site, with development responding to the setting of the landscape.
- 7.5.6 It is proposed that the St James Hospital and its grounds accommodate a mix of uses which reflect and complement the existing character of the former hospital and its surroundings. The hospital site is suitable for a range of uses including: residential development including, elderly person's accommodation, sheltered accommodation and medical facilities provision. It is envisaged that conversion of the hospital, and where appropriate development in its immediate surroundings, are capable of accommodating 209 residential properties. The southern part of the site previously occupied by the Harbour School is envisaged to be able to accommodate 107 residential properties. These capacity estimates are expected to change as proposals are progressed and refined.
- 7.5.7 The hospital grounds currently contain a number of open spaces used informally by the local community for walking and recreation. It is proposed that as part of any proposed scheme that public access is maintained and enhanced with pedestrian access retained to the open spaces within the site and to the chapel. The Cricket Pitch should also be retained as a public facility. Informal pedestrian and cycle access through the site from Locksway Road to Longfield Road enjoyed by the public is long established and this should be retained and enhanced as part of any development scheme.
- 7.5.8 The hospital grounds contain a large number of mature trees and planting which add to the setting of the hospital and provides potential habitat for wildlife, development on the site should look to retain and enhance this setting to deliver biodiversity net gain.

Langstone Campus

- 7.5.9 The University campus site has the potential to incorporate a range of uses including: education, recreation and sports uses, growing the offer of the existing sports clubs and recreation facilities for the university, as well as residential

development including potential sheltered accommodation and elderly person's accommodation and affordable housing.

- 7.5.10 The Langstone campus has two large areas of open space comprised of playing fields and all weather pitches. These playing fields are used by both the university and a number of local sports clubs. The playing fields are used by overwintering Brent Geese and Waders as feeding grounds when they are unable to feed on the mud flats. The eastern of the two playing fields is classified as a core area and the western playing field as a secondary support area in the Solent Waders and Brent Goose Strategy. The Brent Geese require short cropped grass to feed on and open areas with no cover to enable them to spot any potential predators. Both the grass playing fields and the all-weather pitches are considered part of the secondary support area on the western open space.
- 7.5.11 The campus currently benefits from a north-south bus and cycle route 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.

Policy S5: St James' and Langstone Campus

Planning permission will be granted on the St James's and Langstone campus site to provide for a mixed use development comprising medical facilities, education facilities, community facilities, open space and sheltered accommodation and approx. 436 dwellings, provided that development proposals:

- Conserve, enhance and appropriately integrates new development into the distinct spacious and open character of the site.
- Provide new walking and cycling linkages into the surrounding urban area including the provision of off-road cycle and walking routes crossing the site from north to south.
- Protect and enhance habitats and wherever possible creates new wildlife corridors between habitats areas on site, creating biodiversity net gain.
- Provide appropriate local road network capacity/ highway improvements and/or appropriate mitigation.
- Take account of the emerging *Milton Neighbourhood Plan*.

St James's Hospital and grounds (including HCA land)

Planning permission will be granted on the St James's Hospital site for a mixed use development including medical facilities, community facilities and approx. 316 dwellings, where development would:

- Conserve and enhance the integrity and setting of St James's Hospital (Grade II listed), and the Chapel (Grade II listed), and other historic features in the hospital grounds.
- Accommodates a mixture of residential uses including potential sheltered accommodation, elderly person's accommodation and affordable housing.
- Protect the setting of the Listed Hospital by conserving and enhancing, and centrally integrating into new development, the following open spaces: The St James's Hospital Cricket Pitch, The Dog Park, and Land to the north west of the listed chapel and to the east and west of Chapel Way.
- Retains public access to open spaces within the historic grounds of the hospital.

- Provides north-south pedestrian and cycle link from Locksway Road to Longfield Road.

Langstone Campus

Planning permission will be granted on the Langstone Campus site for a mix of around 120 residential properties, education, recreation and community uses, where proposals are in accordance with the following:

- Enhancement of open space provision and protection of the over-wintering Brent Geese and Waders feeding grounds.
- Provision of appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA.
- The north-south bus / cycleway connection along Furze Lane is retained and enhanced
- Contributions are made towards improvements to coastal access along the edge of Langstone harbour
- Appropriate site specific flood mitigation measures are incorporated where necessary.

Further detailed development guidance will be provided in the emerging *Milton Neighbourhood Plan*.

Policy Implementation

The City Council will seek to work with the relevant landowners and the Milton Neighbourhood Forum to deliver appropriate development that takes account of the identified environmental, transport and heritage constraints.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
			✓		✓

Policy Monitoring

Policy Aim	Key Indicator
<ul style="list-style-type: none"> ➤ Delivery of the type and quantum of development listed. ➤ Appropriate mitigation for identified environmental, transport and heritage constraints 	<ul style="list-style-type: none"> - Permissions and completions - Planning permissions granted with appropriate conditions / no objections from statutory consultees.

Further Information:

- PCC (2021) *Housing and Economic Land Availability Assessment*.

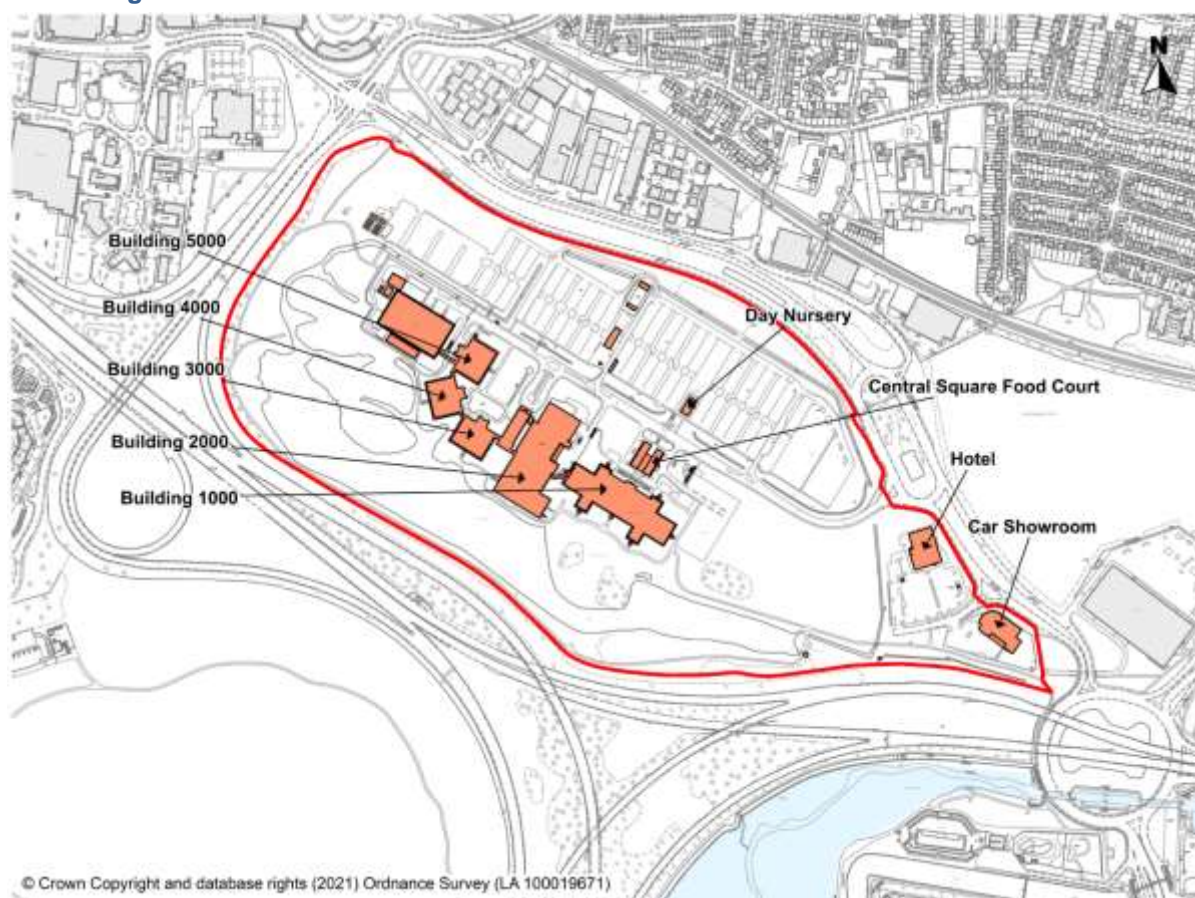
Question 42. St James' and Langstone Campus

a. Do you agree with the proposed approach to Policy S5?

b. If not what changes would you suggest and why?

7.6 Lakeside North Harbour (Policy S6)

Figure 33-Lakeside North Harbour Site



- 7.5.12 Lakeside North Harbour is a part-developed, high quality office campus set within 135-acres of landscaped grounds, originally developed by IBM for their UK Headquarters. Today it is Portsmouth's premier business location and 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. The site 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 shuttle bus runs to the nearby Cosham District Centre.
- 7.5.13 Lakeside currently comprises five, linked but distinct, offices known as Buildings 1000 - 5000. The main office campus is supported by a small-scale retail and commercial hub known as 'Central Square' as well as a Porsche car showroom, crèche facilities, a hotel and leisure centre and substantial surface car parking.
- 7.5.14 The campus offers high quality refurbished, grade A office space to let, plus available development land (currently with an extant outline permission (due to expire in 2022) for the new office uses (69,000 sq m) and a medical centre. The City Council purchased the site in 2019.

Why is this policy needed?

- 7.5.15 As one of the city's most significant employment sites, the retention and provision of employment land at Lakeside is vital to ensuring the city can meet its employment floorspace requirements for the plan period, and to continue to provide high quality office space for the wider sub-region. Assessments of Portsmouth's employment land concluded that Lakeside provides an unrivalled environment for office occupiers. Though this has drawn companies away from the city centre in recent years.
- 7.5.16 However, it is recognised that employment locations are changing and sector trends, such as a reduction in office-based employees, have been rapidly accelerated by necessary home working during the pandemic. To what degree this will continue throughout the plan period is currently unclear. Under these circumstances, it may be appropriate to allow a degree of flexibility to diversify the uses at Lakeside to include an element of residential development. However, it is important to balance the need for flexibility and other required development (such as new homes) with the need to retain jobs within the city.

New Development at Lakeside North Harbour

- 7.5.17 It is envisioned that Lakeside will remain Portsmouth's premier office location supporting by a mix of ancillary and/ or supporting uses. The site will be allocated for up to 50,000 sq m of employment floorspace for offices, research and development or industrial processes (Class E(g)(i-iii) uses) suitable for a high quality office campus location. Given the continued change in the office market and uncertainties in forecasting for long-term need at present, there is potential for the provision of up to 500 new homes to support a sustainable mix of development later in the plan period (10 plus years). This would require sufficient evidence that the full employment allocation can no longer be implemented. Proposals for alternative uses would need to meet the tests of *Policy E2: Employment Land*.
- 7.5.18 Proposals for residential use would need to demonstrate that the site could appropriately support a sustainable new community (including but not limited to connectivity to the wider city, access to services and infrastructure capacity).
- 7.5.19 Given the proximity to bus, rail and cycle lane connections, and the possible continuation of a proportion of employees working from home, some of the site's existing surface parking could be suitable for redevelopment to other uses. Utilising such areas could help to minimise the impact of development on the site's landscaped setting and recognised areas of ecological importance.
- 7.5.20 Development proposals will need to consider any potential impact upon Tree Protection Orders (TPOs) and identified Site of Importance for Nature Conservation (SINC) for rare flora. Avoidance and mitigation options should be considered in the first instance. There are also opportunities for creating links to

and/ or enhancing existing biodiversity networks with several known networks overlapping with or in close proximity to the site (See *Policy G1: Biodiversity* and *G2: Green Infrastructure*).

- 7.5.21 Development proposals should avoid the areas of higher surface flood risk on site where possible. Long-term forecasts indicate that the site may start to fall within Flood Zone 3 from 2115 onward. Proposed development, and its access and egress, would therefore need to ensure that it could be made safe for its lifetime; this could include the siting of more vulnerable uses above ground floor level. The green space in the south-eastern part of the site, currently identified as a secondary support area for Solent Waders and Brent Geese, presents a potential location to maintain as open space for additional flood storage. The need for additional wastewater capacity and an easement would also need to be considered at an early stage in the design and layout of any proposals.
- 7.5.22 It is understood that the site has some potential for features of archaeological significance (prehistoric & Roman remains), the exact extent and nature of which would need to be established. Land contamination is also considered likely in this location; actual ground conditions should be established early in the design stage of any development in order to take account of potential costs and constraints.

DRAFT STRATEGIC POLICY S6: LAKESIDE NORTH HARBOUR

- 7.5.23 Policy S6 sets out the uses and criteria for new development proposals at Lakeside. Proposals for alternative development would also need to meet the tests of *Policy E2: Employment Land*.
- 7.5.24 The Council, as part of its *Economic Development and Regeneration Strategy*, will continue to work to attract a range of occupiers to Lakeside, including those within knowledge-based sectors, which have been shown to increase overall productivity in a wide range of other business sectors.

Policy S6: Lakeside North Harbour

Lakeside North Harbour is allocated as an employment-led location to provide at least 50,000sq of office uses (Class E(g)(i-iii) uses), suitable for a high quality business campus location. Supporting and ancillary uses may also be acceptable.

Up to 500 dwellings could be supported over the longer term, if can be demonstrated that the full employment allocation can no longer be implemented and where this would constitute sustainable development.

Planning permission will be granted where the following can be provided as appropriate:

- Design and layout takes account of the high quality, campus-style setting of the business park and the areas and networks of recognised ecological value
- Implementation of highway and access improvements as required
- Pedestrian and cycle facilities and network access.
- Flood mitigation measures and sustainable drainage systems
- Sewage infrastructure.
- Land remediation measures.
- Investigations into the significance of the archaeological assets and their setting, and the potential impacts of the development proposal on their significance.

Policy Implementation

The Council, as the site owner, will seek to achieve a sustainable mix of uses and occupiers for the campus. This may involve the production of further planning documents on a future vision for the site.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
			✓	✓	✓

Policy Monitoring

Policy Aim	Key Indicator
➤ To deliver 50,000 sq m of net employment floorspace and associated/ supporting uses and the provision of new homes (up to 500) where appropriate.	- The type and quantity of development permitted.

Further Information

- GL Hearn (May 2020) *Portsmouth Employment Land Needs Review*
- PCC (2021) *Housing and Economic Land Availability Assessment*

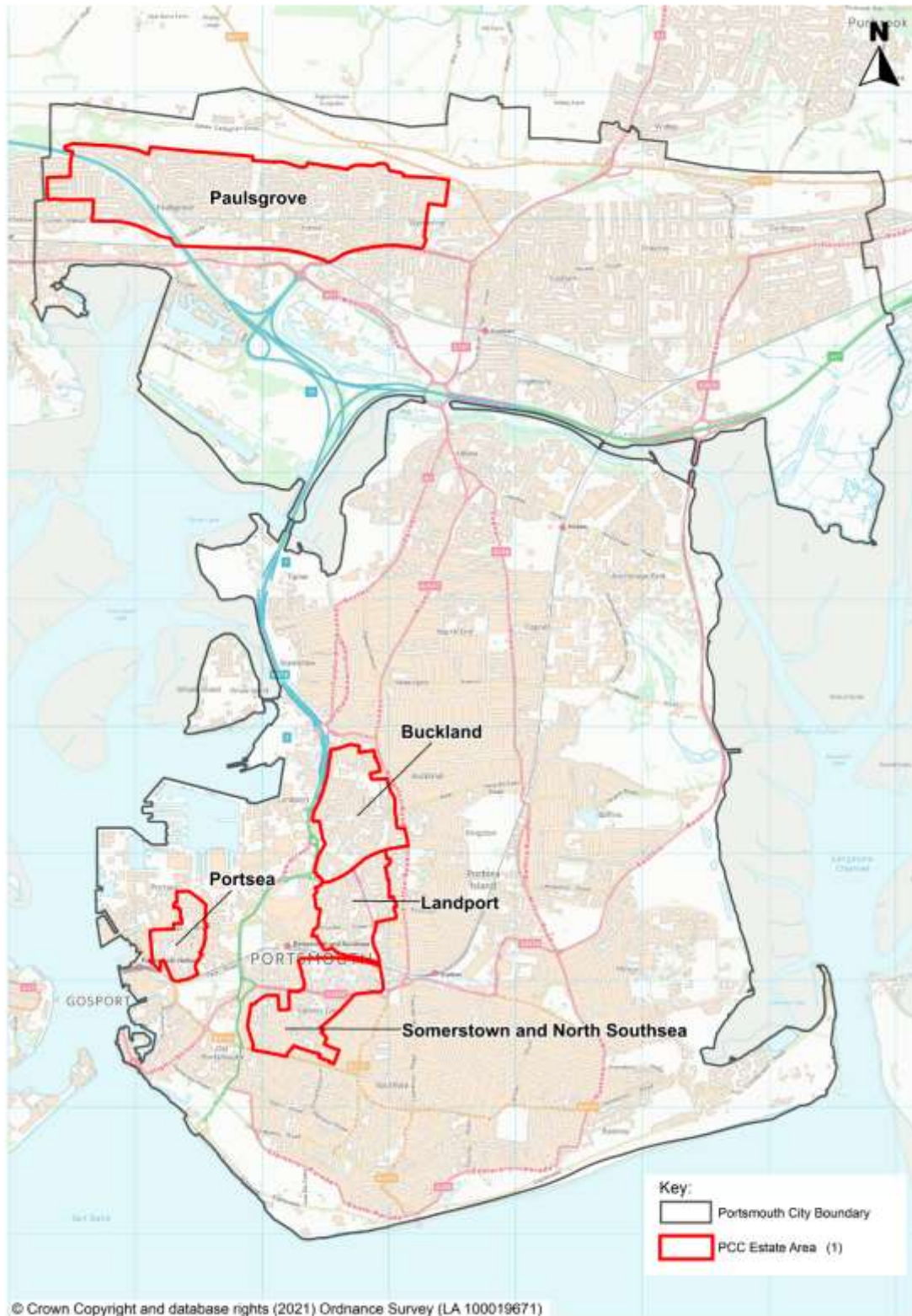
Question 43. Lakeside North Harbour

- Do you agree with the proposed approach to Policy S6?
- If not what changes would you suggest and why?

8 - Other Allocations

8.1 PCC Estate Renewal (Policy S7)

Figure 34-Portsmouth City Council Housing Estates



- 8.1.1 Within the city there are a number of housing estates which are predominantly in Portsmouth City Council ownership. These estates were largely 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 the most rebuilding and public housing estate creation happened. The notable exception to this is Paulsgrove (and Leigh Park, Wecock Farm and Crookhorn in Havant Borough) which was constructed on what at the time was the edge of the city to house residents who had lost their home.
- 8.1.2 The estates were built largely between from the 1950's to the early 1970's using development principles based on ideas around patterns of living, use of open space and motor vehicles which were prevalent at time. The road oriented development patterns of the time have created physical barriers between estates and other areas of the city, as well as dominating the built form. In addition there are a number of opportunities for the reuse of spaces which no longer functions as originally intended, for example drying court areas, internal drying spaces. There are opportunities to revisit the design of aspects of the estates such as walk ways, bin stores, and open spaces to reform and make spaces more useable for modern needs. There are however aspects of the mid-20th century estate design that are significant positives, such as the more generous space standards which the properties were built to.
- 8.1.3 Given that the properties in the 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 refurbishment or replacement. The City Council has a rolling programme of planned maintenance, renewal and renovation of its stock within the city, the most recent example was Wilmcote House which was renovated to EnerPhit standards which are the retrofit equivalent of Passivhaus standards. This process is on-going with proposals being developed to deconstruct and replace Horatia House and Leamington House in Somerstown.
- 8.1.4 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.

Why is this policy needed?

- 8.1.5 The Plan must consider where growth and/ or renewal opportunities could arise during the plan period. National planning policy encourages the utilisation of existing development areas where possible and the creation of mixed, sustainable communities that promote the health and wellbeing of residents. Estate renewal should include the provision of good quality public open space, safe routes with

good access to services and facilities and improved connections to the wider urban area.

- 8.1.6 The policy is to encourage the Council and other landowners to plan for wider estate renewal as opportunities arise, in order to improve quality and housing needs of residents and rationalise existing stock through renewal or replacement, as well as providing additional affordable /social and market housing, and avoid to a piecemeal approach to development in these areas.
- 8.1.7 In March 2021, Portsmouth City Council were awarded funding to test the Government's forthcoming *National Model Design Code* (NMDC); guidance on the production of design codes, guides and policies that aim to promote successful design in new developments. Working with the *Ministry of Housing and Local Government* (MHCLG), Portsmouth City Council are seeking to develop a design coding process for estate renewal within the city, using Horatia and Leamington site redevelopment in Somerstown (see para. 8.1.10) as a case study for the pilot. The development and testing of a potential Estate Renewal Design Code will be developed with in consultation with residents and with input from service areas across the Council. If successful, such a Design Code could be adopted by the Council to help guide proposals within the other PCC owned estates in the city.
- 8.1.8 The further development of this policy for the new Local Plan will be influenced by consultation with residents to understand what is important to them about the existing estates, and what should be preserved as well as renewed over time.

Portsmouth City Council owned housing areas

- 8.1.9 The following areas are largely in Portsmouth City Council ownership.

Somerstown and North Southsea

- 8.1.10 The Somerstown estate area was allocated for regeneration under policy PCS6 of the *Portsmouth Local Plan* (2012). An Area Action Plan (AAP) was drawn up to guide and co-ordinate the redevelopment of Somerstown and North Southsea area into a sustainable urban community with a safe, active and attractive environment with a new community heart. Under the AAP, new council housing stock has been delivered on Winston Churchill Avenue, Blackfriars Close and King Street plus a staffed adventure playground and the Somerstown Community Hub; an iconic building crossing Winston Churchill Avenue to physically connect the two areas of the Somerstown estate. The Hub offers a community café, large rooms for varied activities, sports hall, dance studio and IT suite. As exemplified by the Somerstown Hub, new development in the area has incorporated high quality, innovative design.

Horatia and Leamington House replacement scheme and wider area improvement

- 8.1.11 The City Council is currently exploring options for the future of Horatia and Leamington House towers, located within the existing AAP area, following structural reports that concrete used in the original 1960s construction is not as strong as expected, requiring their demolition. The deconstruction of the two tower blocks has been approved and is due to commence in Spring 2021. Initial engagement with the local community has started to consider the options for the development of the tower blocks sites and the Gibson Centre and wider area improvements. The site is to the south of the city centre area and the edges are subject to development pressures from student accommodation and potential new residential accommodation. It is envisaged that the redevelopment of the towers could accommodate a range of new homes in the region of 477 - 556 new homes which would include the reprovision of 272 Council homes from the original development.
- 8.1.12 Any new development should consider the aims of the Area Action Plan or subsequent planning guidance and/ or relevant design codes.

Buckland

- 8.1.13 The Buckland area in close proximity to the Portsmouth International Port and located immediately to the north of Portsmouth City Centre. Improved links to the city centre and the International Port could help facilitate economic growth in the area. The proposed Bus Rapid Transit (BRT) route is also likely to run close to this area of the city which will enhance other areas of the city. In recent years the Council has already delivered the renovation of Wilmcote House in Somerstown to Passivhaus standards.

Landport

- 8.1.14 Landport is located immediately adjacent to Portsmouth City Centre but suffers from poor linkages to much of the rest of the city caused by the surrounding road network. There is some limited potential to intensify residential use in the area, though further work would be required to determine if any larger scale estate regeneration is needed. The area would benefit from improved linkages to Portsmouth City Centre as part of the work on the city centre.

Portsea

- 8.1.15 Portsea is one of the oldest areas in Portsmouth. It was subject to slum clearance in the early 20th century and includes the oldest public housing in the city. In addition parts of the area were further rebuilt following World War II. The area now includes a number of new developments and urban design interventions from the early 2000s which provided a large number of new dwellings in the area including social housing. New Council led development in the area includes the John Pounds Centre community hub and the Cumberland Home Zone area.

Paulsgrove

- 8.1.16 Paulsgrove is different in nature to the other estates of the city; it is located off Portsea Island on the edge of the City Council's area. It consists mainly of system built low rise, lower density residential development from the mid-20th century. There may be potential for replacement and intensification of residential use in part of the estate in the longer term.

DRAFT STRATEGIC POLICY S7: PCC ESTATE RENEWAL

- 8.1.17 The aim of Policy S7 is ensure renewal the city's predominantly Council owned estates (identified in Figure 32) contribute towards creating a healthier, safer more welcoming environment and providing additional and improved housing and facilities for residents.
- 8.1.18 Estate renewal will be expect to provide a high quality of design and sustainability (inc. high levels of energy and water efficiency) and green infrastructure in-line with the relevant draft Local Plan policies.

Policy S7: PCC Estate Renewal

Masterplanning and individual proposals within PCC Estates must be led by the following key principles:

- The provision of suitable homes to meet the needs of residents; including redevelopment, maintenance and/or improvements as appropriate to existing housing and the delivery of additional dwellings;
- Provision of accessible facilities and hubs for the community;
- Making the health and wellbeing of residents central to all aspects of proposals, including the submission of a Health Impact Assessment;
- Improving access and legibility through improved connectivity, including links to wider city, employment locations and key facilities;
- Creating welcoming, accessible high quality open spaces and play areas and improvements to existing open spaces and amenity areas;
- Development of improved, safer pedestrian and cycle routes;

Proposals will need to take account of any relevant planning and design guidance or codes.

Policy Implementation

Renewal will be implemented by masterplan documents and/ or Council strategies, supported by the preparation of design guidance/ codes as appropriate.

Funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
✓				✓	✓

Policy Monitoring	
Policy Aim	Key Indicator
➤ Delivery of redeveloped and additional new dwellings, including affordable homes.	- Permissions and completions.
➤ Development of masterplans, planning guidance or design codes as appropriate.	- Progression and adoption planning guidance documents.

Further Information:

- PCC (2012) *Somerstown and North Southsea Area Action Plan*
- PCC (Feb 2021) Horatia House and Leamington House Sites Outline Business Case
- MHCLG (2021) National Model Design Code consultation document

Question 44. PCC Estate Renewal

a. Do you agree with the proposed approach in Policy S7? b. If not what changes would you suggest and why?

We are also seeking views on what aspects estate renewal should focus on preserving or improving (e.g. building type, form or scale, range of facilities, parks/ green spaces, service/ storage areas, parking).

c. What elements of the existing estate areas are important and should be retained? d. What elements should be renewed for the future?

d. What else should any renewal consider?

8.2 The Seafront (Policy S8)

Figure 35-Seafront Policy Area Map



- 8.2.1 Portsmouth's seafront area - stretching from Old Portsmouth to Eastney - is one of the city's most important and valued assets. It plays a key role in shaping perceptions of Portsmouth, both as a visitor destination and as a home for residents. People come to the seafront to enjoy views of the Solent, experience the seafront environment, and take part in leisure, cultural, and recreational activities all year round.
- 8.2.2 The seafront is a key asset of Portsmouth's network of open spaces and an important contribution to the city's green and blue infrastructure. The area also helps support the physical health and mental wellbeing of its many users.
- 8.2.3 The seafront is regularly utilised for large scale sporting events (such as the Great South Run), music events and festivals, entertainment events, fetes/markets, and other activities. These activities and events are considered important contributors to the vibrancy of the seafront and the city.
- 8.2.4 The seafront area is rich in history, which harks back to Portsmouth's past as a naval port of strategic importance. There are many heritage assets located within the seafront, such as Southsea Common (which is on Historic England's Register of Historic Parks & Gardens), former military fortifications and installations (such as Long Curtain Moat, and Fort Cumberland), and numerous war memorials and monuments, all which are statutorily listed or Scheduled Ancient Monuments. Multiple Conservation Areas cover most of the seafront area.
- 8.2.5 The seafront area is also of great importance for nature conservation, both locally and nationally. Several sites within the seafront area help to support populations

of protected bird species and areas of rare habitat. Eastney beach and the land around Fort Cumberland are protected as Local Wildlife Sites. Portsmouth Harbour to the west and Langstone Harbour to the east are designated as Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), and Ramsar sites. Langstone Harbour also forms part of the Solent Maritime Special Area of Conservation (SAC), and the Solent is designated as a SPA.

- 8.2.6 In terms of connectivity with the rest of the city and wider region, the seafront is accessible on foot, by cycle, bus, Hovercraft (from the Isle of Wight), and car. Currently, there is a significant amount of on-street and off-street car parking provision, and existing road space and design predominantly prioritises vehicle movements over other forms of transport, such as walking and cycling, which often means traffic congestion is high during peak season, contributing to air quality issues.
- 8.2.7 The seafront and other parts of the city are protected from flooding by existing sea defences stretching from Old Portsmouth to Eastney. However, these defences are coming to the end of their serviceable life and need replacing. Work is currently underway to plan and build replacement sea defences. This infrastructure is of vital importance for protecting homes and businesses from sea level rise and extreme weather events associated with climate change.

Why is this policy needed?

- 8.2.8 In order to maximise the potential of the seafront as a whole and to create a vibrant area, there is a need to promote regeneration opportunities and enhance the seafront's leisure, culture, and entertainment offer to strengthen the seafront as a year-round destination for the benefit of local residents and visitors to the city. A vibrant seafront will also contribute to the vitality for the city, making it more attractive for investment.
- 8.2.9 New sea defences are also planned, which will not only provide sufficient protection for the seafront from future sea flooding events but will also provide opportunities to regenerate the seafront, and to review connectivity, movement, and accessibility around the seafront area and between the seafront and other parts of the city. Planning permission¹¹⁴ for the sea defences was granted in 2020 and funding secured from the Environment Agency and other sources. Works started in 2020 and are expected to continue until 2026.
- 8.2.10 There is significant opportunity to re-evaluate street and public space design to better cater for movement and travel within the seafront by active and sustainable methods of transport, such as walking and cycling, in-line with the travel and transport aspirations for the rest of the city. This has the benefit of making the

¹¹⁴ LPA planning reference no. 19/01097/FUL

seafront a better place for people's health and wellbeing, as well as contributing towards vitality and economic activity.

- 8.2.11 Any changes that occur within the seafront, such as new development or regeneration of particular areas, need to ensure that the seafront's numerous historic and natural environment assets are appropriately protected, conserved, and enhanced, in-line with national policy and the approach taken within this Local Plan as a whole.

DRAFT STRATEGIC POLICY S8: THE SEAFRONT

- 8.2.12 Policy S8 sets out the broad approach to development in the seafront area. The Council adopted the *Seafront Masterplan Supplementary Planning Document* (SPD) in 2021, which described development opportunities in detail. The *Seafront Masterplan SPD* is a material consideration for decision-making, and sets out the planning delivery strategy for guiding, shaping, and enabling future development, regeneration, and public enhancement opportunities in the seafront area. Notwithstanding this, the *Seafront Masterplan SPD* will be subject to review as necessary and as opportunities for future enhancements arise.
- 8.2.13 Opportunity Areas have been identified in the *Seafront Masterplan SPD* to show areas capable of supporting development or regeneration. Within these areas, the Masterplan provides more guidance on the parameters for development. Within other areas, development will be assessed against the policies of this Local Plan taken as a whole.
- 8.2.14 The Council has also identified a 'green corridor' running most of the length of the seafront, with the aim of delivering additional green infrastructure through new development and public realm enhancements (See *Policy G2: Green Infrastructure*).

Policy S8: The Seafront

Development within the seafront area must respond sensitively to the open character of the seafront area and contribute positively to the revitalisation and regeneration of the seafront. Development proposals should take into material consideration the guidance contained in the Council's adopted *Seafront Masterplan SPD*.

Proposals for new development must meet the criteria below:

- **Use:** Development proposals should contribute towards or support the vibrancy and vitality of the seafront area. This could include diversification of the leisure, cultural, and recreation offer, as set out in the guidance contained in the *Seafront Masterplan SPD*

- **Design:** Development proposals within the seafront area must be designed to respond sensitively to the positive character of the seafront and its historic and natural assets, and to take opportunities to improve the character and design quality of the area and the way it functions, especially the public realm.
- **Heritage and natural environment:** The seafront's heritage assets must be conserved and enhanced in a manner appropriate to their significance. The seafront's assets of nature conservation value must be conserved and enhanced, with opportunities to incorporate biodiversity improvements in and around development encouraged, especially where this can secure measurable net gains for biodiversity.
- **Connectivity:** Development proposals must take appropriate opportunities to strengthen and enhance pedestrian and cycle links between the seafront and nearby areas, such as Southsea Town Centre and Castle Road, as well as to the wider city.
- **Green infrastructure:** Development proposals must take into account of the proposed 'green corridor' for the seafront (under *Policy G2: Green and Blue Infrastructure*).
- **Flood and sea defences:** Replacement coastal defences and associated infrastructure must integrate as sensitively as practicable with the seafront area.

Policy Implementation

The council will use the Seafront Masterplan SPD and the Seafront Strategy to guide and inform investment and development of publically and privately owned assets and land. These will be funded through the council's capital programme, the highways PFI, and through developer contributions, as well as seeking funding opportunities from other public funds.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
✓				✓	✓

Policy Monitoring

Policy Aim	Key Indicator
➤ To regenerate the seafront as a vibrant place to live, work and visit.	- Appropriate development in the opportunity areas identified in the Seafront Masterplan SPD granted planning permission.

Further Information

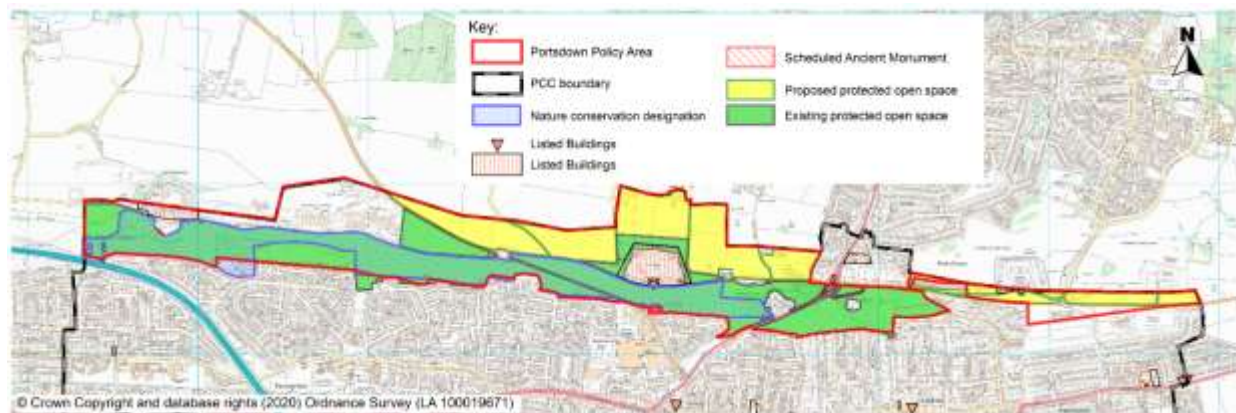
- PCC (2021) Seafront Masterplan Supplementary Planning Document
- PCC *Portsmouth Parks and Open Spaces Strategy 2012-2022*

Question 45. The Seafront

a. Do you agree with the proposed approach in Policy S8? b. If not what changes would you suggest and why?

8.3 Portsdown Hill (Policy S9)

Figure 36-Portsdown Hill



- 8.3.1 Portsdown Hill is one of the largest areas of open space in the Portsmouth; it provides the backdrop to the city's skyline and stunning views out over the city, Solent and the surrounding countryside. It is a key feature of the landscape that forms part of the city's identity. It also forms the northern boundary of the city area and adjoins the Winchester, Fareham and Havant authority areas.
- 8.3.2 Over fifty hectares of the south face of the hill is a designated SSSI owing to its chalk grassland habitat. There are a number of features used by visitors including open access land (including a small common on the south-facing scarp), access to the nature reserve, several car parks, two pubs, and a number of food and drink vans. In addition, Portsdown Hill has significant history associated with the defence of the Naval Dockyard and is home to three historic fortresses, of which Fort Widley and Fort Purbrook fall within the city's boundary. The MoD retains a presence in the area with their technology park, adjacent to a significant area of brownfield land, which was the site of the former Defence Science and Technology Laboratory complex at 'Portsdown Main'.
- 8.3.3 As the Portsmouth grows it becomes ever more important to provide open space for recreation and leisure and to support the health and wellbeing of residents, as well as retain areas of noted landscape, habitat and heritage value.

Why is this policy needed?

- 8.3.4 National planning policy states that access to a network of high quality open spaces, and opportunities for sport and physical activity, are vital for health and well-being. The updated *Open Spaces Assessment* identified that there has a need for an additional of open space in-line with projected population growth. The Portsdown Hill area potentially presents an opportunity provide new publically accessible open space, if the land can be made available.

Landscape and Ecological Value

- 8.3.5 The 2012 *Hampshire Integrated Character Assessment* recorded Landscape Character Areas geographically unique within the county; this included Portsdown Hill, highlighting that the SSSI designation could extend to include other relic fragments of species rich chalk grassland (designated SINCs) and areas of high suitability for restoration to chalk grassland. The elevated exposed ridge line and upper parts of the escarpment was noted for its spectacular views south over Portsmouth, the harbours and eastern Solent to the hilly backdrop of the Isle of Wight. The Assessment remarked that Portsdown Hill is a popular and, importantly, a very locally used greenspace which provides a contrast to the dense urban development to the south. The presence of other habitat types such as hedgerows, woodland and scrub, could form a mosaic of habitats that increase the biodiversity and amenity of the area.
- 8.3.6 Under the Higher Level (Environmental) Stewardship Plan for Portsdown Hill (PCC, 2012) a 7ha former arable field has been returned to species rich grassland to improve the biodiversity of the area as well as actions to improve biodiversity of mown open space. This schemes will be replaced by a new Environmental Land Management Scheme during the plan period which may seek to introduce wildlife-friendly management to an extended area of the hill.
- 8.3.7 Habitat management of the complex habitat beyond the Portsdown Hill SSSI area should complement the ecological value of the SSSI through extending and connecting with similar habitats across the wider landscape, including the opportunity areas identified by the *Hampshire Local Ecological Network* (See *Policy G1: Biodiversity*).
- 8.3.8 PCC are currently updating management plans for both the SSSI and non SSSI land on Portsdown Hill, which proposals should take account of once published.

Heritage Value

- 8.3.9 The land has been shaped by Neolithic, Bronze Age, Iron Age, Roman, Saxon and Medieval cultures; livestock grazing produced the distinctive open grassland, rich in the specialised plant species that can cope with the free draining, nutrient-poor soil.
- 8.3.10 Portsdown's chalk ridge would have formed a valuable vantage point to overlook the surrounding areas and a dry east-west route through a generally marshy landscape. Though much of the archaeological evidence of settlement has been lost through disturbance in the last 150 years, some remnants remain including a number of round barrows.
- 8.3.11 The defensive hill forts, originally built along the crest of the hill in the 1850s to counter an attack from inland upon the Naval Dockyard, are now protected as Scheduled Ancient Monuments. Since then they have been used for many other

purposes, most notably for planning during the D-Day landings of the Second World War.

Enhancement and Land use Potential

Open space and recreation

- 8.3.12 An appraisal of land within in the city in the Council's *HELAA* has highlighted the potential of farmland owned by the City Council (as shown in Figure 35), currently let for grazing on the northern upper slope of the hill. A potential change of use to open space would expand the publically accessible areas of Portsdown Hill, enhancing the potential of the area for greater recreational use and delivering an additional 42.7ha of open space within the Portsmouth City boundary - if the land was to become available over the longer term. Uses of the site in the meantime should not prevent this opportunity. Recreational use could include the creation of footpaths and other supporting infrastructure as appropriate in-line with the site's management.

Previously developed areas

- 8.3.13 The main area of Brownfield land on Portsdown Hill is the former Portsdown Main site. Given the relative remoteness of the site from the main built up residential area of Portsmouth, its visual prominence and the proximity of other employment uses at Qinetiq (which has been granted planning permission to expand), employment uses would be the most suitable use in this location. Any development would need to be restricted to previously developed portions of the site, close to the boundary with the existing Qinetiq site, providing similar scale development. There may be some limited potential for employment development on the previously developed proportion on the northern slope of the site, though the access to this area and any potential landscape impact will need to be carefully considered.
- 8.3.14 The northern portion of the site and part of the neighboring Qinetiq site fall within Winchester District which adjoins the city at this point. The traffic impact of any access from the portions of the site within Winchester District that need access through land under Portsmouth City Council's jurisdiction will need to be considered in conjunction with potential development on the Portsmouth portion of the site. All proposals will also need to consider visual and other impacts on the surrounding countryside of Winchester District.

- 8.3.15 Policy S9 seeks to protect and enhance upon the noted characteristics of Portsdown Hill, encouraging change where this would complement and enhance what makes the area unique, including its existing recreational, landscape, ecological and heritage value.
- 8.3.16 There is in principle support for proposals that increase and enhance the public access to land on Portsdown Hill, including, but not limited to, expansion of the existing open access land and the creation of footpaths, as appropriate in-line with the site's management and the acceptability of any potential impacts. Any proposals for facilities relating to the recreational use of area would also need to ensure that all amenity issues can be sufficiently managed, including disturbance the relative tranquility of the area.
- 8.3.17 Proposals should seek to extend and connect important habitats and promote biodiversity net gain, as appropriate in-line with Portsdown Hill Higher Level Stewardship Plan (or replacement scheme), other relevant management plans and Local Plan policies.
- 8.3.18 The provisions of this policy only apply to the areas of Portsdown Hill that fall within the Portsmouth authority area boundary. The Council will however continue to work closely with the other local authorities' that adjoin the Portsdown Hill area in order to achieve the best outcomes for its use and setting.

Policy S9: Portsdown Hill

Proposals on the areas of open space and undeveloped land on Portsdown Hill (as identified in Figure 35) for enhancements to recreation, biodiversity or active travel (such as pedestrian pathways and cycle paths) will only be permitted where there are no significant adverse effects to the recognised landscape, ecological and heritage value of the area.

Provision of facilities to support the recreational use of the area will be permitted on existing brownfield sites and parking areas only provided they do not detract from the landscape value of the hill and do not cause an unacceptable amenity impact.

Proposals for development on brownfield land will be granted where the use is appropriate for its location and does not detract from the landscape value of the area.

All development proposals will be evaluated against the following criteria:

- The merits of the design, its impact upon and setting within the landscape of Portsdown Hill.

- The impact on nature conservation, and opportunity to provide, biodiversity net gain including habitat creation / linkages.
- The impact upon historic and archaeological sites and their setting.
- Opportunities to increase public access and recreation as appropriate.

Policy Implementation

The Council will work together with the relevant local authorities adjoining the site boundary, landowners and key stakeholders to achieve the best outcomes for its use and setting.

National funding	Partnerships	CPO	CIL/ Section 106	Other planning/ strategy documents	Development Management
	✓		✓	✓	✓

Monitoring

Policy Aim	Key Indicator
➤ Protect the landscape importance of Portsdown Hill.	- Permissions for new development granted in accordance with / contrary to policy.
➤ Creation of new public open space at Portsdown Hill	- Amount of new public open space (hectares) enabled and implemented.

Further Information: Further Information

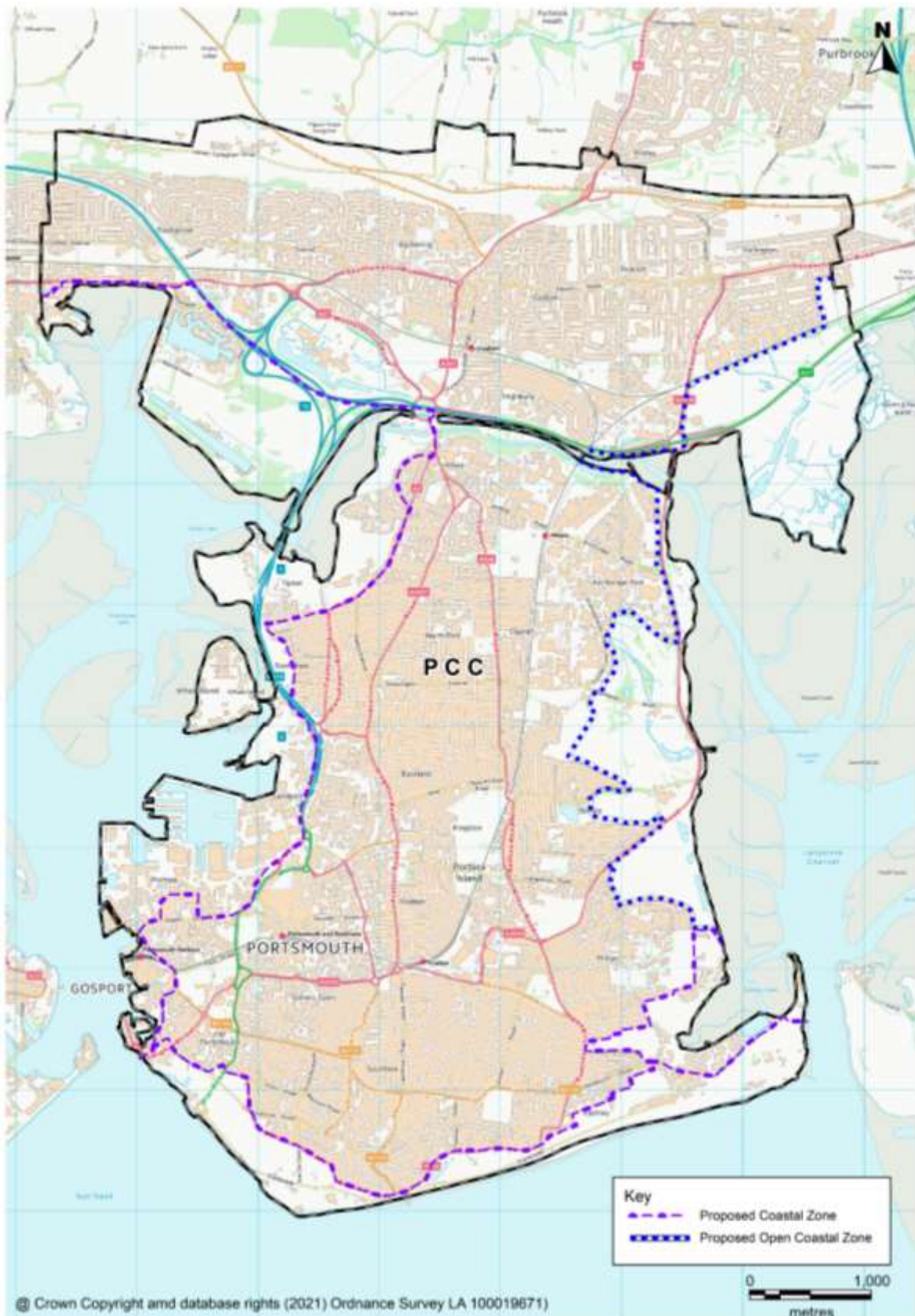
- Portsmouth City Council *Open Space Needs and Opportunities Assessment 2018 and 2020 Addendum*.
- HCC (2012) *Hampshire Integrated Landscape Character Assessment*
- PCC webpage on Portsdown Hill:
<https://www.portsmouth.gov.uk/services/leisure/parks/portsdown-hill/>

Question 46. Portsdown Hill

- Do you agree with the proposed approach to Policy S9?
- If not what changes would you suggest and why?

8.4 Coastal zone (Policy S10)

Figure 37-Coastal Zones Map



- 8.4.1 Portsmouth has a significant length of coastline within its boundaries which brings a range of benefits for the city. The coastline environment will need management to address predicted sea level rise.
- 8.4.2 On the eastern coastline, the intertidal and connected on-shore 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 support a range of species. In contrast, the western seaboard around Portsmouth Harbour is more urbanised and includes Gunwharf Quays and marine employment areas including the International Port and the Naval base, which are key to the on-going economic productivity of the city.
- 8.4.3 The coastline also features heritage assets such as monuments, historic buildings and other irreplaceable features as well as safeguarded minerals reserves and safeguarded minerals and waste infrastructure.
- 8.4.4 Whilst *Policy S8: The Seafront* considers with the southern frontage of Portsea Island in Southsea, this policy considers the wider coastline (and the open coastal zone as defined on 6); as well as the development of needed coastal protection measures.

Why is this policy needed?

- 8.4.5 Access to, and views of, the coast have a positive effect on health and well-being. The coast also 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 also required in order to protect existing homes, businesses and key infrastructure.
- 8.4.6 The NPPF states that Local Plans must set out the priorities for development and use of land within its area, including strategic policies for relating enhancement of the local environment and coastal change management; this includes protecting valued landscapes, providing accessible open spaces that support communities' health and social well-being and seeking to shape places in ways that minimise vulnerability and improve resilience to change.
- 8.4.7 As the land and marine planning regimes overlap in the 'inshore area' (the intertidal zone between the high water and low water mark - see Figure 37) it is important to ensure that an integrated approach is taken to planning decisions which may impact coastal, estuary and tidal waters.

Strategic Approach to Coastal Change Management

- 8.4.8 Coastal change in Portsmouth is managed on behalf of the Council by the Coastal Partners¹¹⁵, an alliance formed to take a strategic approach to coastal management across the Fareham Borough Council, Gosport Borough Council, Havant Borough Council and Portsmouth City Council authority areas. The overarching strategy for shoreline management across Portsmouth is set out in the *North Solent Shoreline Management Plan (SMP)*. This non-statutory document sets out a broad scale assessment of the risks associated with coastal evolution and balances the management of coastal flooding and erosion risks associated with coastal processes such as waves and tides. The SMP sets out a policy framework for addressing identified risks to people and the developed, historic and natural environment in a sustainable manner across three epochs of time over the next 100 years.
- 8.4.9 The Coastal Partners have developed *Flood and Coastal Erosion Risk Management Strategies* for the city which translate the management policies of the SMP into a more defined set of delivery plans which help to decide how the coastline surrounding Portsmouth will be managed for the next 100 years. The *Portsea Island Coastal Strategy Study (PICSS, 2012)*, in combination with the *Portchester Castle to Emsworth Coastal Flood and Erosion Risk Management Strategy (PEMS, 2013)*, comprise the long-term strategic approach to Portsmouth's entire coastline. Each strategy breaks the coastline into a series of 'frontages' for which particular coastal management plans options have been assessed and a programme of works devised. A number of gradual improvement works to flood defences have taken place along the Portsea Island coastline in-line with the adopted Coastal strategies in recent years, with further upgrades expected throughout the plan period. In particular, significant progress has been made around the north of Portsea Island with a series of new defences now completed or are in progress. The new Southsea Seafront defences have recently been granted planning permission and are expected to be delivered over the next six years.
- 8.4.10 Prioritisation of the delivery of the defence works set out in the FCERM strategies for the city are based upon the assessed residual life of existing protections and the potential consequences of a significant number of properties flooding in the event of a breach. Delivery of the defences rely on securing sources of funding including Council Capital expenditure as well as grants from the Environment Agency. In some areas, Capital Grant funding from the Government is not justifiable and the strategies recommend that developers and other beneficiaries should contribute to the upkeep of their own coastal defences. Private owners are responsible for the maintenance of their own coastal defences and this maintenance will be monitored by the Council in order to manage the coastal flood

¹¹⁵ Coastal Partners website: <https://coastalpartners.org.uk/authority/portsmouth/>

and erosion risks to the wider community. The need for and maintenance of coastal defence will need to be secured through an appropriate legal agreement.

The South Marine Plan

- 8.4.11 The *2009 Marine and Coastal Access Act* introduced a marine planning system with requirements to produce plans to enable sustainable development of marine areas, similar to land-use plans. Portsmouth falls within the area covered by the *South Marine Plan (2018)* which sets the policies for the use of the marine environment. The Marine Plan and Local Plan areas of jurisdiction overlap in the intertidal zone, and as such any applications for development within this area would need to refer to both. The *South Marine Plan* may have relevance for proposals that fall outside of the coastline but could have an impact on marine activities, such as a land-based development that may eventually discharge into the sea.

Development and the Coastline

- 8.4.12 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 within the harbour.
- 8.4.13 Proposals should also seek to protect and enhance access to the coast wherever possible as this area provides multiple benefits to the health and wellbeing of the city's residents. Opportunities to create or improve access to the coast will however, need to take account of potential impacts upon the local ecological network, including the Solent Wader and Brent Geese site network as per *Policy G1: Biodiversity*.
- 8.4.14 To manage the particular vulnerability to the impacts of climate change along the coast, development proposals should also incorporate design measures that are intended to promote resilience to climate change and flood risk; see *Policy D2: Sustainable Design and Construction* and the requirements of *Policy G5: Flood Risk and Drainage*.
- 8.4.15 Development proposals that span the in-shore area (such as flood defence works) will be determined by the Council in-line with the principles of the Coastal Concordat; the Concordat provides a framework for co-ordinating the separate regulatory processes for the consenting of coastal developments in England to aid more effective working and promote sustainable growth in the coastal zone. Applications within the inshore zone will also need to take account of the South Marine Plan policies and early engagement with the Marine Management Organisation (MMO) is strongly encouraged. The Council will consult with the MMO on any such applications that could impact the marine environment.

- 8.4.16 Where proposals incorporate new, privately funded coastal defence measures, these will need to be in line with the relevant policies within the SMP and the Coastal Partners' underlying FCERM strategies. Early engagement with the Coastal Partners is strongly encouraged to ensure that these are delivered in a consistent way with the wider delivery of coastal defence schemes around the city.
- 8.4.17 In addition to the above, the open coastal zone (as defined in the policy map) has been recognised for its largely undeveloped setting. Proposals within this area will need to demonstrate the need for proximity to coast and/ or marine and marine uses, and/or that alternative site locations have been fully considered. Planning applications within this area should seek to maintain and improve access to, and views of, the coastline where practicable.

DRAFT DEVELOPMENT MANAGEMENT POLICY S10: COASTAL ZONE

- 8.4.18 Policy S10 allows for an recognises the expected coastal management changes over the plan period and sets out requirements for any development proposals within the Coastal Zone.

Policy S10: Coastal Zone

New, or replacement coastal defence schemes should be consistent with the management approach for the frontage presented in the relevant *Shoreline Management Plan* and FCERM strategy; and demonstrate that there will be no material adverse impact on the environment.

Development proposals in coastal areas must:

- avoid adverse impacts upon marine and maritime related uses, infrastructure and activities; and
- seek opportunities to maintain and enhance access to the coast.

Proposals for development within the Open Coastal Zone (as defined in map xx) will only be granted planning permission where it can be demonstrated that the following has been considered, as appropriate:

- The need to be sited within a coastal location
- Preservation of the character of the open coastal zone

Policy Monitoring	
Policy Aim	Key Indicator
➤ To identify Portsmouth's coastal zone as a valued landscape and an area requiring coastal change management.	- Progress of Coastal Partners programme of defence works improvements
➤ To resist inappropriate development in the coastal zone and maintain and/or improve access to the coast.	- Applications refused in accordance with Policy S10.

Further Information:

- *North Solent Shoreline Management Plan*: <http://www.northsolentsmp.co.uk/>
- Marine Management Organisation (2018) *South Marine Plan*
- PCC (2021) *Development and tidal flood risk background paper*
- Coastal Partners website: <https://coastalpartners.org.uk/authority/portsmouth/>

Question 47. Coastal Zone

- a. Do you agree with the proposed approach to Policy S10?
- b. If not what changes would you suggest and why?

DRAFT

9 - Appendices

DRAFT

9.1 Appendix A: Draft Local Plan Policies Map

To be added as a separate document

DRAFT

9.2 Appendix B: Glossary

To be added

DRAFT

9.3 Appendix C: Matrix of Objectives, Policies and Other Council Strategies

To be added

DRAFT

9.4 Appendix D: List of draft Policies and Proposed Schedule of Policy Replacements

To be added

DRAFT

9.5 Appendix E: Employment forecasting table

Table 7 shows how proportional growth and reduced losses have been applied to sectors the Council has identified objectives for local interventions.

Table 7 - Portsmouth Growth Sectors and Recommendations
(amended from GL Hearn Portsmouth City Employment Land Forecasting, May 2020)

Industry	Findings/ Recommendations	Approach
Manufacturing (particularly advanced manufacturing and engineering)	<p>A high relative representation compared to the South East. Manufacturing is a key industry and there are specific targets for growth.</p> <p>Reduce forecast losses to reflect the emphasis on Marine & Maritime engineering and higher value manufacturing and R&D.</p>	Decouple regional forecast decline (caused by increased automation and other wider sector declines) for local market.
Transport and Storage	<p>Targets for Portsmouth to become a global leader in the zero-carbon shipping industry. Plans to increase regional and national transport links to the city.</p> <p>Reduced forecast losses to Reflects capabilities in sea and land transport.</p>	
Hospitality	Cited as a key priority growth sector and tied to a number of strategic objectives related to the visitor economy.	Assign proportion of remaining job growth to relative increase in baseline position
Information & Communications	Policy objectives to increase knowledge-based sectors along with big-data analytics.	
Professional, science & technology	Wide variety of advanced engineering services related to the marine and maritime industries with potential for growth, relates to innovation quarter.	
Education	Education is core to several key objectives to upskill and drive innovation in Portsmouth. The University of Portsmouth will be a key incubator for new businesses and is sited a key originator of growth in the future.	
Arts & Recreation	Key priority growth sector and tied to a number of strategic objectives related to the visitor economy and culture-led regeneration	

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Local Plan consultation - communications plan

purpose	To make sure residents of Portsmouth are informed and empowered to contribute their views to the Local plan for Portsmouth.																																		
corporate priority	<ol style="list-style-type: none"> 1. Make Portsmouth a city that works together, enabling communities to thrive and people to live healthy, safe and independent lives. 2. Encourage regeneration built around our city's thriving culture, making Portsmouth a great place to live, work and visit. 3. Make our city cleaner, safer and greener. 4. Make Portsmouth a great place to live, learn and play, so our children and young people are safe, healthy and positive about their futures. 																																		
lead officers	Ali Coote - marketing and communications officer working with Rachel Cutler, Planning Policy Manager.																																		
budget	Suggested budget of £30,000																																		
timeframe	Summer 2021 (July/ August)																																		
key messages	You can help shape the future of your community Your input is needed to decide on future plans for Portsmouth																																		
audiences	Portsmouth residents - PO1 - PO6 Adjacent authorities and stakeholders																																		
tools	<p>The following marketing activity is proposed.</p> <table border="1"> <thead> <tr> <th>Channel</th> <th>Activity</th> <th>Audience</th> </tr> </thead> <tbody> <tr> <td colspan="3">Council owned channels</td> </tr> <tr> <td>Flagship, Term Times, House Talk</td> <td>Reminder of virtual consultation opportunity, or direct to city helpdesk</td> <td>Whole city, parents and council tenants</td> </tr> <tr> <td>City Help Desk</td> <td>An opportunity to go through the consultation over the phone</td> <td>Non-website users</td> </tr> <tr> <td>Intranet, In The Know, Team Brief</td> <td>Reminder to council staff to participate in Local Plan</td> <td>Staff</td> </tr> <tr> <td>Email footers</td> <td>Include a suitable link in all appropriate email footers - ongoing</td> <td>People in email contact with the council</td> </tr> <tr> <td colspan="3">Print</td> </tr> <tr> <td>Leaflet to all residents</td> <td>Include CTA to participate online or call city helpdesk</td> <td>All residents</td> </tr> <tr> <td colspan="3">Digital channels</td> </tr> <tr> <td>Arup digital consultation</td> <td>Virtual consultation that is accessible by everyone</td> <td>Portsmouth residents age 18 and over</td> </tr> <tr> <td>Facebook</td> <td>Organic and boosted posts from corporate page - new artwork to be produced</td> <td>Portsmouth residents age 18 and over</td> </tr> </tbody> </table>		Channel	Activity	Audience	Council owned channels			Flagship, Term Times, House Talk	Reminder of virtual consultation opportunity, or direct to city helpdesk	Whole city, parents and council tenants	City Help Desk	An opportunity to go through the consultation over the phone	Non-website users	Intranet, In The Know, Team Brief	Reminder to council staff to participate in Local Plan	Staff	Email footers	Include a suitable link in all appropriate email footers - ongoing	People in email contact with the council	Print			Leaflet to all residents	Include CTA to participate online or call city helpdesk	All residents	Digital channels			Arup digital consultation	Virtual consultation that is accessible by everyone	Portsmouth residents age 18 and over	Facebook	Organic and boosted posts from corporate page - new artwork to be produced	Portsmouth residents age 18 and over
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	Instagram	Paid-for adverts from corporate account	Portsmouth residents age 18 and over																														
	Face-to-face																																
	Consultations	3 events across the city for residents to give their views	Participants																														
	Media																																
	Media releases	Media releases at the start of consultation and part way through to encourage participation	Residents of city																														
	Partners																																
	Shaping, University, LEP	Ask partners to promote consultation in their publications																															
	Arup	Virtual consultation providers																															
implementation	<p>Budget - approx. £30,000</p> <table> <tbody> <tr> <td>Flyer design</td> <td>180</td> </tr> <tr> <td>Flyer distribution</td> <td>6,000</td> </tr> <tr> <td>Poster design</td> <td>180</td> </tr> <tr> <td>Poster display</td> <td>360</td> </tr> <tr> <td>Social media</td> <td>180</td> </tr> <tr> <td>Arup consultation</td> <td>10,000</td> </tr> <tr> <td>Banner design</td> <td>900</td> </tr> <tr> <td>Banner production</td> <td>£500.00 + vat</td> </tr> <tr> <td>Southsea library venue hire</td> <td>0</td> </tr> <tr> <td>Central Venue hire</td> <td></td> </tr> <tr> <td>Cosham venue hire</td> <td></td> </tr> <tr> <td>North Venue hire</td> <td></td> </tr> <tr> <td>Comms staff resource</td> <td>£10,000 - £15,000</td> </tr> <tr> <td>Accessibility editing</td> <td>Aprox £1,500</td> </tr> <tr> <td>Total</td> <td>17800</td> </tr> </tbody> </table>			Flyer design	180	Flyer distribution	6,000	Poster design	180	Poster display	360	Social media	180	Arup consultation	10,000	Banner design	900	Banner production	£500.00 + vat	Southsea library venue hire	0	Central Venue hire		Cosham venue hire		North Venue hire		Comms staff resource	£10,000 - £15,000	Accessibility editing	Aprox £1,500	Total	17800
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Agenda Item 5



Portsmouth
CITY COUNCIL

Title of meeting:	Cabinet
Date of meeting:	27 th July 2021
Subject:	Revised Local Development Scheme
Report by:	Ian Maguire, Assistant Director Planning & Economic Growth, Regeneration
Wards affected:	All
Key decision:	No
Full Council decision:	No

1. Purpose of report

- 1.1. To purpose of this report is to outline and seek approval for the revisions to the Local Plan timetable set out in the Local Development Scheme (LDS).

2. Recommendations

- 2.1 To approve the revised Local Plan timetable set out in the Local Development Scheme (LDS). The revised LDS to have effect from 27th July 2021.
- 2.2. To grant delegated authority to Assistant Director Planning & Economic Growth to make minor amendments to the LDS and Development Plan Document timetables as necessary.
- 2.3 Note the progression of other Portsmouth Development Plan Documents and Supporting Planning Policy documents.

3. Background

- 3.1. The Local Planning Authority is preparing a new Portsmouth Local Plan to guide the future development of the city. The new Local Plan will set out details on the level of development that will take place and where it will be located, and identify the infrastructure needed to support this growth. It will contain planning policies that will inform and influence the quality of development delivered in the city by guiding decision making on planning applications. Critical to the development of the Local Plan is sound supporting evidence to assess the need, impact, viability and deliverability of development.



- 3.2. A Local Development Scheme (LDS) is required under Section 15 of the *Planning and Compulsory Purchase Act 2004* (as amended). The LDS must specify the development plans, the subject matter of those plans and the geographical areas they cover and the timetable for the production and adoption of the plans. For the Council this is primarily the new Portsmouth Local Plan.
- 3.3. Local planning authorities have an obligation to keep the LDS up to date and publish it on their website. Portsmouth's LDS was last updated on 20th August 2020 following approval by the Planning Policy and City Development Portfolio holder.

The Revised Portsmouth Local Plan Timetable

- 3.4 A draft of the new Local Plan for consultation was prepared in early 2021. Following internal review and discussion, it was requested that supporting evidence was expanded upon to help explain the proposed approach in key policy areas and some additional options (reasonable alternatives) were drafted for consultation. This coincided with the withdrawal a strategic site submission by the site promoter, necessitating a review of the housing supply options and trajectory in order to meet the Government's housing need targets for Portsmouth for the plan period. Spring 2021 also saw a number of national policy changes and consultation proposals which needed to be taken account of in the draft document, including: the Class E to residential (C3) prior approval permitted development right¹, First Homes guidance², proposed changes to Article 4 Directions³ and a draft National Model Design Code⁴.
- 3.5 Reviewing the work programme following the above has highlighted that more time will be needed between the Reg 18 and Reg 19 consultation stages to present the summary of Reg 18 consultation comments and PCC's proposed response to Cabinet, before the preparation of the final Reg 19 draft of the new Local Plan. Prior to the Reg 19 consultation, the team will also need to ensure there is sufficient deliverability evidence for the proposed Strategic Site Allocations, that any issues/ options arising from the Reg 18 consultation have been fully addressed and that plan preparation has met all legal requirements (such as the Duty to Co-operate).
- 3.6 It is therefore recommended that the Local Plan timetable in the Local Development Scheme is amended to move the dates of the key milestones of the project forward by approximately six months from those in the current LDS (Aug 2020); see the revised Local Development Scheme document (Appendix A) and updated schedule in Table 1 below.

¹ *The Town and Country Planning (General Permitted Development Etc.) (England) (Amendment) Order 2021* effective from 1st August 2021.

² MHCLG (Apr 2021) Government response to the First Homes proposals and NPPG on First Homes (MHCLG, May 2021).

³ MHCLG (Jan 2021) National Planning Policy Framework Draft text for consultation

⁴ MHCLG (Jan 2021) National Model Design Code



Table 1. Updated LDS Timetable for the new Local Plan

Timetable for Production of the new Portsmouth Local Plan		
Preparation ('Reg. 18')	Issues and Options consultation	✓ July 2017
	Evidence base consultation ('Local Plan update')	✓ February 2019
	Consultation on a draft Local Plan	Early 2021 Summer 2021
Publication ('Reg. 19')	Consultation on the proposed Local Plan for submission	Summer 2021 Winter 2021
Submission ('Reg. 22')	Submission of Plan to Secretary of State	Autumn 2021 Spring 2022
Examination hearings ('Reg. 24')	Examination of the Plan by an appointed Inspector	<i>Tbc*</i>
Inspectors report ('Reg. 25')	Inspectors Report on whether the plan is legally compliant and sound	<i>Tbc*</i>
Adoption ('Reg. 26')	Formal adoption of the plan by the council	Summer 2022 <i>Prior to the end of 2022</i>

* Timetabling subject to resource availability at the Planning Inspectorate.

The Hampshire Minerals and Waste Plan

3.7 The Council, as a Unitary Authority, is also the minerals and waste planning authority for the Portsmouth area, with a statutory duty to prepare a Local Plan to guide the need for and location of development for minerals and waste management. The Council undertakes this role through the Hampshire Minerals and Waste Plan (HMWP) Partnership, to ensure minerals and waste matters are planned for on a county-wide basis, with Hampshire County Council (HCC), Southampton City Council, New Forest National Park Authority and the South Downs National Park Authority ('the Hampshire authorities').

3.8 *The Hampshire Minerals and Waste Plan* (HMWP) 2013) forms part of the Development Plan for Portsmouth, alongside the adopted Portsmouth Local Plan (2012). An initial review of the Hampshire Minerals and Waste Plan was undertaken in 2018, five years' since the date of adoption; it concluded that the HMWLP did not require review at that time and should be reviewed again in 2020. When this was revisited, the HMWLP was still deemed to be sufficiently supporting minerals and waste planning in the area but a review of all policies indicated that a partial update was needed to ensure full compliance with the NPPF and the National Planning Policy for Waste (NPPW). The decision to undertake the review of the HMWLP was approved by all partnership authorities, including Portsmouth City Council at a Full Council meeting in March 2021⁵. A timetable for the review has also been published by HCC since the LDS was last updated.

⁵ Meeting details at:
<https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=146&MId=4270&Ver=4>

3.9 While much of the review of the HWMP will be conducted by Hampshire County Council through an existing Partnership Agreement, the Council will need to be involved in steering the direction of any review of the HMWP, and to approve key decisions and/ or documents for consultation and adoption as required. The timetable is outlined in section 3.2 of the LDS: it includes a first stage public consultation period in the Autumn with the overall aim of progressing the review through to adoption in 2023.

4. Reasons for recommendations

4.1 The Council is required to keep the LDS up to date and publish it on their website. The suggested change to the timetable(s) would reflect progress in the preparation of the Portsmouth Local Plan and the Review of the Hampshire Minerals and Waste Plan during the last year.

5. Integrated impact assessment

5.1 An integrated impact assessment is not required as the recommendations do not directly impact on service or policy delivery. Any changes made arising from this report would be subject to investigation in their own right.

6. Legal implications

6.1 Section 15 of the *Planning and Compulsory Purchase Act 2004* (as amended) requires the local planning authority to prepare and maintain a Local Development Scheme. It also requires the local planning authority to revise the Local Development Scheme at such time as they consider appropriate. The updated Local Development Scheme is to be made available to the public, together with the changes made and details of compliance with the timetable.

7. Director of Finance's comments

7.1 The recommendations within this report regarding the updated LDS timetable do not impact on Council financial resources. It is anticipated that the costs for any external technical work required to inform the final production of the Local Plan will be met from the existing cash limited budget.

.....
Signed by:

Appendices: Appendix A: Revised Local Development Scheme (July 2021)

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

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

Title of document	Location
Portsmouth Local Development Scheme (Aug 2020)	https://www.portsmouth.gov.uk/ext/development-and-planning/planning-policy/local-development-scheme
Hampshire Minerals and Waste Local Development Scheme (December 2020)	https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan
The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 - Explanatory memorandum	https://www.legislation.gov.uk/uksi/2021/428/memorandum/contents
MHCLG (April 2021) Government response to the First Homes proposals National Planning Policy Guidance on First Homes (May 2021):	https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-first-homes-proposals-in-changes-to-the-current-planning-system https://www.gov.uk/guidance/first-homes
National Planning Policy Framework and National Model Design Code: consultation proposals	https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals

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Portsmouth Local Development Scheme

A timetable for the production of Portsmouth's Local Planning Policies

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Portsmouth Local Development Scheme

A timetable for the production of Portsmouth's Planning Policy Documents

Approved by Portsmouth City Council Cabinet at their meeting of 27th July 2021

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1. Introduction

What is the Local Development Scheme?

- 1.1 This Local Development Scheme (LDS) came into effect on 27th July 2021.
- 1.2 The Council must¹ produce a 'Local Development Scheme' (LDS) to inform local residents and other stakeholders about the following:
 - the development plans that the city council will be preparing over the next three years;
 - the subject matter of those plans and the geographical areas they cover; and
 - the timetable for the production and adoption of development plan documents, primarily the new *Portsmouth Local Plan 2020-2038*.

1.1 The Plan Making System

- 1.1.1 Planning decisions must be taken in line with the 'development plan' unless material considerations indicate otherwise. The 'development plan' for an area can be made of a number of statutory planning documents, which contain both strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters).
- 1.1.2 In Portsmouth, the Local Plan set out the vision for the future of the city and the strategy for meeting its development needs over a 15-year period. The Local Plan covers the city's housing and infrastructure needs and provides a framework for addressing key economic, social and environmental concerns. Planning applications for development in Portsmouth are guided by the policies in the Local Plan.
- 1.1.3 The content of the Local Plan is shaped by engagement with communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The Council also co-operates extensively with neighbouring authorities through the Partnership for South Hampshire (PfSH) on cross-boundary issues, and with other Local Authorities in Hampshire in planning for sustainable mineral resource use and waste management in the county.
- 1.1.4 The Development Plan can also include location specific documents. Neighbourhood plans developed by communities can help to deliver sustainable development in their locality by influencing local planning decisions. Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use. Any neighbourhood prepared in Portsmouth would form part of the city's development plan, once adopted.
- 1.1.5 The preparation of new Local Plans involves assessing the future needs and opportunities, exploring and identifying options, and then setting out a preferred approach. This process involves gathering evidence, meaningful engagement and consultation and on-going assessment of proposals through Sustainability Appraisal and Habitat Regulations

¹ Under the *Planning & Compulsory Purchase Act 2004* (as amended)

Assessment. A Sustainability Appraisal² (SA) systematically assesses the extent to which the plans and policies, when judged against reasonable alternatives, will help to achieve key environmental, economic and social objectives. A Habitats Regulations Assessment³ considers if a plan or project is likely to have significant effects on designated habitat sites.

- 1.1.6 Table 1 on the following page explains the next steps following the preparation of a draft Plan; submission, examination and adoption.
- 1.1.7 Supplementary planning documents (SPDs) are not part of the development plan but form a material consideration in decision-making. SPDs provide more detailed advice or guidance on adopted Local Plan policies.
- 1.1.8 The Local Plan is supported by a range of other planning documents adopted by the Council. The Statement of Community Involvement (SCI) sets out how residents and other stakeholders can be involved in putting together plans for the future of the city and in determining planning applications. The Authority Monitoring Report, published annually, assesses the effectiveness of adopted plan policies, and the Council's progress on the production of the new Local Plan against the timetable set out in this document.

² Under S.19 of the Planning and Compulsory Purchase Act (as amended) and as per the Environmental Assessment of Plans and Programmes Regulations 2004

³ As per the *Conservation of Habitats and Species Regulations 2017*.

Table 1: Development Plan Preparation Stages

Preparation	This stage consists of one or more formal opportunities for stakeholders to influence and comment on the content of the plan. This is often referred to as a 'Regulation 18' consultation ⁴ .
Publication	This is the publication of the plan in a form which the Council believe to be the sound final version which it intends to submit for examination. There then follows at least a six week period for interested parties to comment on the plan. Comments received at this stage must specifically relate to the legal compliance and 'soundness' ⁵ of the plan. This is often referred to as 'Regulation 19' or 'Pre-Submission' consultation.
Submission	This is when the plan is submitted by the council to the Secretary of State. The 'Examination' of the Local Plan starts at this point; this where a Planning Inspector will assess whether the Local Plan has been prepared in line with the relevant legal requirements and whether it meets the tests of 'soundness'.
Hearings	The most crucial time in the Examination is the hearings sessions. The hearings are public discussions where the Inspector explores the issues raised by the plan and the written and verbal representations.
Inspectors report	The Inspector then issues a report on the Examination. This sets out whether the plan is legally compliant and sound. It also sets out any changes the Inspector recommends in order for the plan to be found sound.
Adoption	The final stage in the process is the formal adoption of the plan by the council. Once adopted, on it forms part of the statutory development plan.

⁴ Under *The Town and Country Planning (Local Planning) (England) Regulations 2012* (as amended)

⁵ This relates to the National Planning Policy Framework's (updated Feb 2019) 'tests of soundness' set out in para.35.

2. Portsmouth's Existing Planning Policy Framework

2.1 The development plan for Portsmouth City Council area is comprised of the following adopted documents:

- Portsmouth Plan Core Strategy (2012)
- Portsmouth City Local Plan saved policies (2006)
- Southsea Town Centre Area Action Plan (2007)
- Somerstown and North Southsea Area Action Plan (2012)
- Hampshire Minerals and Waste Plan (2013)

2.2 The development plan documents are supported by a number of adopted Supplementary Planning Documents (SPDs)⁶, which provide greater detail on specific Local Plan policies and help guide their implementation. The following SPDs are currently in force:

- The Seafront Masterplan (2021)
- Houses in Multiple Occupation (2019)
- Minerals and Waste Safeguarding in Hampshire (2016)
- Oil and Gas Development in Hampshire (2016)
- Housing Standards (2013) and review briefing note (2015)
- Eastney Beach Habitat Restoration and Management Plan (2014)
- Parking Standards and Transport Assessments (2014)
- Student Halls of Residence (2014)
- Achieving Employment and Skills Plans (2013)
- Portsmouth City Centre Masterplan (2013)
- Tall Buildings (2012)
- The Hard (2012)
- Air Quality and Pollution (2006)
- Reducing Crime through Design (2006)
- Developing Contaminated Land (2004)

Other Relevant Documents

2.3 Key supporting documents include:

- Statement of Community Involvement (2017)
- Community Infrastructure Levy Charging Schedule (2012)
- Solent Recreation Mitigation Strategy (2017)
- Interim Nutrient Neutral Mitigation Strategy (2019)

2.4 For more information on the above, a profile of the main documents is available in Appendix A and all documents are available from the Council's website at:

<https://www.portsmouth.gov.uk/localplan>

⁶ SPDs can be viewed online at: <https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-portsmouth-plan-adopted-2012>

3. The Future Development Plan

3.1 The Council is preparing the following documents:

<p>Portsmouth Local Plan</p>	<p>Sets the vision and strategic priorities for the future of the city (15 year plan period). The Plan will allocate sites for housing, employment and other key land uses and policies to guide development proposals.</p>	<p>The new Local plan will replace the policies in the following:</p> <ul style="list-style-type: none"> - Portsmouth Core Strategy (2012); - Southsea Town Centre (2007) and North Southsea and Somerstown (2012) AAPs; - Portsmouth City Plan (2006) saved policies - Existing SPDs (as necessary⁷)
<p>Hampshire Minerals and Waste Plan Review</p>	<p>A partial review⁸ of the Hampshire Minerals and Waste Plan (2013) to existing plan policies remain up-to-date and effective in ensuring a sufficient supply of minerals and efficient management of Hampshire's waste, whilst protecting the environment and communities.</p>	<p>The new policies would replace their equivalents in the Hampshire Minerals and Waste Plan (2013), existing SPDs may be reviewed as necessary.</p>
<p>Supporting Documents</p>	<p>SPDs and other planning documents may be required to expand upon or implement policy requirements in the Portsmouth Development Plan Documents.</p>	<p>Following consultation, such document will need to be formally adopted or brought into force by the Council. Existing documents will be superseded as required.</p>

3.2 Plans will be informed by the gathering of proportionate evidence. Evidence studies will be published alongside draft iterations of the Plan(s)⁹.


3.3 Meaningful engagement and consultation with residents and other key stakeholders is essential for developing a Local Plan for Portsmouth that is able to deliver positive and effective outcomes. While Table 1 set outs the stages in Local Plan preparation and the main opportunities to comments on the Plan, engagement on the Local Plan may take a range of forms and is not strictly limited to formal consultation periods.

⁷ The new Local Plan will be accompanied by a schedule setting out which documents to be superseded by the new policies.

⁸ For further details see: <https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan>

⁹ See the full evidence base for the new Portsmouth Local Plan at: <https://www.portsmouth.gov.uk/ext/development-and-planning/planning-policy/new-local-plan-evidence>

3.1 New Portsmouth Local Plan Timetable

The new Portsmouth Local Plan will set out the strategy for development in the city up to 2037/ 38.		
Joint production?	No	
Chain of conformity		
National policy	National Planning Policy Framework	
Regional policy	The South Hampshire Spatial Position Statement (non-statutory)	
Local policy	The Portsmouth Local Plan	
Timetable for production		
Preparation ('Reg. 18')	Issues and Options consultation	✓ July 2017
	Evidence base consultation ('Local Plan update')	✓ February 2019
	Consultation on a draft Local Plan	Summer 2021
Publication ('Reg. 19')	Consultation on the proposed Local Plan for submission	Winter 2021
Submission ('Reg. 22')	Submission of Plan to Secretary of State	Spring 2022
Examination hearings ('Reg. 24')	Examination of the Plan by an appointed Inspector	<i>Tbc*</i>
Inspectors report ('Reg. 25')	Inspectors Report on whether the plan is legally compliant and sound	<i>Tbc*</i>
Adoption ('Reg. 26')	Formal adoption of the plan by the council	<i>Prior to end of 2022 (tbc)</i>
Geographical coverage		
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* Timetabling subject to resource availability at the Planning Inspectorate.

3.2 Hampshire Minerals and Waste Plan Timetable

The existing *Hampshire Minerals and Waste Local Plan (2013)* seeks to ensure the Plan area maintains a reliable and timely supply of minerals and efficient management of Hampshire's waste up to 2030. An initial review of the Hampshire Minerals and Waste Plan was undertaken in 2018, five years' since the date of adoption; it concluded that the HMWLP did not require review at that time and should be reviewed again in 2020. When this was revisited, the HMWLP was still deemed to be sufficiently supporting minerals and waste planning in the area, but the review of all policies indicated that a partial update was needed to ensure full compliance with the NPPF and the National Planning Policy for Waste (NPPW). This decision was approved by Full Council in March 2021.

Joint production?	Yes - the plan will be prepared collectively by Portsmouth City Council, Hampshire County Council and Southampton City Council together with the New Forest and the South Downs National Park Authorities.
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Chain of conformity

National policy	National Planning Policy Framework (NPPF)
Regional policy	n/a
Local policy	The above authorities' Local Plans

Timetable for production

Preparation ('Reg. 18')	Evidence base preparation	Mar - Sept 2021
	Consultation on the Draft Plan Update and Evidence	Oct - Dec 2021
Publication ('Reg. 19')	Consultation on the updated Plan to be submitted to the Secretary of State	Apr - June 2022
Submission ('Reg. 22')	Submitting the Plan to the Secretary of State	Winter 2022
Examination hearings ('Reg. 24')	Examination of the Plan by an appointed Inspector	Spring 2023
Inspectors report ('Reg. 25')	Planning Inspector delivers his report on the Plan	Summer 2023
Adoption ('Reg. 26')	All authorities adopt the Plan, as modified by Planning Inspector	Autumn 2023

Geographical coverage



3.3 Supporting Planning Policy Documents

- 3.3.1 Further planning documents may be required to support the policies contained within Portsmouth's Development Plan Documents.
- 3.3.2 Supporting documents will be subject to public consultation as required. Once adopted by the Council, these documents would form a material consideration in the determination of planning applications in Portsmouth.
- 3.3.3 Table 2 outlines the key planning documents are currently under preparation.
- 3.3.4 A full review of all existing SPDs will take place prior to the adoption of the new Portsmouth Local Plan.

Table 2: Supporting documents under preparation

Document	Purpose	Target Date(s)
Portsmouth City Centre Masterplan and Delivery Plan	A development strategy to support the major regeneration to the city centre, to include the vision and objectives for the future of the centre and guiding principles for the type, form and location of new development. Replacement of the 2013 Masterplan.	Draft document published for consultation summer 2021
Biodiversity Net Gain SPD	New guidance on biodiversity net gain (as required by the forthcoming Environment Act) for development proposals in Portsmouth.	To be progressed for consultation in 2022.

4. Monitoring and Review

- 4.1 The Authority Monitoring Report (AMR), published annually, will assess the Council's progress in preparing development plan documents against the programme in this LDS, and identify any changes required.
- 4.2 Any proposed changes to the LDS programme would need to be agreed by Council, and reflected in an update to this document. This includes the need for an additional development plan documents, which are not currently in the LDS, or any amendments required due to substantial regulatory changes.
- 4.3 Development plan documents should be reviewed to ensure that policies remain up-to-date and effective. A review must be undertaken within five years of adoption date of a plan¹⁰. The Council should undertake an initial review to determine whether:
- policies do not need updating, and publish the reasons for this decision; or
 - that one or more policies do need updating, and update their Local Development Scheme to set out the timetable for this revision.
- 4.4 Statements of Community Involvement must also be reviewed at least every 5 years. It is important that Statements of Community Involvement are kept up-to-date to ensure effective engagement at all stages of the planning process

¹⁰ *The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, S.10a.*

Appendix A: Portsmouth's existing Planning Policy Framework

Title:	Portsmouth Plan Core Strategy and polices map
Adoption date:	January 2012
Website:	http://www.portsmouth.gov.uk/living/planning
Description:	<p>The other planning policy documents are in compliance with the Portsmouth Plan. The Portsmouth Plan sets out the overall vision and objectives for the city.</p> <p>The plan contains policies for the development of strategic sites in the city including Tipner, Port Solent, Horsea Island, the city centre, Lakeside Business Park, Somerstown and North Southsea and Fratton Park as well as the city's district centres and seafront. There are also core policies seeking sustainable, high quality development together with a suite of development management policies. Each policy section sets out the mechanisms through which the proposals will be implemented as well as a monitoring framework. The policies map sets out all of the adopted local planning policies geographically.</p>

Title:	Portsmouth City Local Plan saved policies
Adoption date:	July 2006
Website:	https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-portsmouth-plan-adopted-2012.aspx
Description:	<p>The Local Plan covers the whole city and contains strategic policies, policies for determining planning applications and specific allocations for individual sites. Most of the plan has been replaced by the Portsmouth Plan but some development management and site allocation policies still apply.</p>

Title:	Hampshire Minerals and Waste Plan
Adoption date:	October 2013
Website:	https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan
Description:	Portsmouth City Council, as a minerals and waste planning authority, has a statutory duty to prepare a Local Plan to guide the need for, and locations of, minerals and waste management development. The Council works jointly on minerals and waste matters with Hampshire County Council, Southampton City Council, New Forest National Park Authority and the South Downs National Park Authority ('the Hampshire authorities'). The Hampshire Minerals and Waste Plan sets out a spatial vision for future minerals and waste planning in Hampshire and includes site allocations. This has been supplemented by two SPDs on Oil and Gas Development and Minerals and Waste Safeguarding which provide additional guidance on the implementation of the of the HMWP relating to these issues.

Title:	Southsea Town Centre Area Action Plan
Adoption date:	July 2007
Website:	https://www.portsmouth.gov.uk/ext/documents-external/pln-area-action-plan-southsea-town-centre-jul07.pdf
Description:	This AAP covers Southsea town centre and redefines the centre in anticipation of development in the town centre. It contains policies on retail and town centre uses, traffic and access, design and heritage, the public realm and opportunity sites. It was adopted in 2007 as a ten year plan for the centre but is to be reviewed as part of a new Portsmouth Local Plan.

Title:	Somerstown and North Southsea Area Action Plan
Adoption date:	July 2012
Website:	https://www.portsmouth.gov.uk/ext/documents-external/pln-area-action-plan-somerstown-nsouthsea-jul12.pdf
Description:	This AAP covers the Somerstown and North Southsea part of the city and contains a vision and planning policies to support the regeneration of this area. It is to be reviewed as part of a new Portsmouth Local Plan.

Other Documents:

Title:	Statement of Community Involvement
Adoption date:	June 2017
Website:	https://www.portsmouth.gov.uk/ext/documents-external/pln-sci-2017-final.pdf
Description:	The Statement of Community Involvement (SCI) sets out how residents and other stakeholders can be involved in putting together plans for the future of the city and in determining planning applications.

Title:	Community Infrastructure Levy Charging Schedule
Adoption date:	January 2012
Website:	https://www.portsmouth.gov.uk/ext/documents-external/pln-cil-charging-schedule.pdf
Description:	The CIL Charging Schedule sets a locally based infrastructure tariff giving developers more certainty over what they will have to contribute to support infrastructure development. It spreads the cost of providing infrastructure over a wide range of developments and provides a fund to put in the place essential infrastructure to support development. It replaces the Section 106 mechanisms in many cases, although the S106 regime continues for site specific infrastructure and affordable housing. A list of infrastructure which will be or may be provided through CIL is set out in the Regulation 123 list.

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Agenda Item 6



Portsmouth
CITY COUNCIL

Title of meeting: Cabinet

Date of meeting: 27 July 2021

Subject: Future of Waste Collection Services

Report by: James Hill - Director of Housing, Neighbourhood and Building Services

Report author: Colette Hill - Assistant Director of Neighbourhoods

Wards affected: All

Key decision: Yes

Full Council decision: No

1. Purpose of report

- 1.1. To update the cabinet of the options for future waste collections in the city.

2. Recommendations

- 2.1. That the cabinet note the likely outcomes of the Environment Bill - in particular the requirement for a consistent set of materials to be collected.
- 2.2. That the cabinet agree with the principle of the provision of a twin stream recycling collection system rather than a kerbside sort system, and delegate authority to the Director of Housing, Neighbourhoods and Building Services to develop a detailed plan for implementation of a twin stream collection service in the City. (Twin stream will require 2 recycling containers, kerbside sort will require 4 recycling containers, see 3.7).
- 2.3. That the Cabinet note that the delivery of a twin stream collection system is dependent on the outcomes of the Environment Bill, agreement by Waste Disposal partners on the provision of a Materials Recovery Facility (MRF) to enable twin stream collection, and agreement from other Hampshire waste collection authorities to deliver a twin stream collection service.
- 2.4. Note that a further report will be brought to Cabinet with the business case for the provision of the MRF later this year.
- 2.5. That the cabinet agree a further report is brought to Cabinet for decision to agree a final specification for the twin stream collection service ahead of implementation.

3. Background



- 3.1. Under the terms of the Environmental Protection Act, 1990, Portsmouth City Council (the 'Council') is classed as a Waste Collection and Disposal Authority, and as such, under section 45 (1), has a statutory duty to collect household waste from all domestic properties in the city. Under Section 46(4) of the Act, the Council has specific powers to stipulate:
 - The size and type of the collection receptacle(s);
 - Where the receptacle(s) must be placed for the purpose of collecting and emptying;
 - The materials or items which may or may not be placed within the receptacle(s).
- 3.2. Currently rubbish is collected weekly and recycling is collected fortnightly. Additionally, by September 2021, over 55,000 (approx. 60%) households will also benefit from a separate food waste collection. There is also a network of bring banks for glass, textiles and cartons.
- 3.3. Portsmouth has a recycling rate of 26.7% (2019/20) and has improved due to changes made to the waste collection system as the amount of waste produced reduced and the amount of recycling increased.
- 3.4. Portsmouth has one of the lowest landfill use rates in the Country at 4.2% of waste.
- 3.5. The Council is keen to improve the range of materials that residents can recycle. This is demonstrated by the introduction of carton bring banks and a food waste collection service.
- 3.6. Additionally, the Environment Bill is progressing through Parliament and one of the key outcomes will be the requirement for consistency of collections in terms of the materials collected.
- 3.7. To deliver the aspiration for residents to recycle more, and to meet the requirements of the Environment Bill, PCC will need to expand the range of materials collected to include other plastics, cartons and glass at the kerbside. There may also be a requirement to provide free green waste collections.
- 3.8. There are a number of ways that we could collect these additional items and we have modelled two main systems for consideration for recycling. A green waste service would be provided separately.
 - A '**kerbside sort**' collection system - this would require residents to sort materials into an additional 3 containers which are then loaded at the side of the vehicle. This would provide high quality recycling. This option would



require significant changes to the existing waste transfer station network which would include provision and development of additional sites that would need to be identified, secured and appropriate planning permissions. There are also some practical concerns in terms of operating this type of system in Portsmouth due to the narrow roads which often have cars parked on each side of the road. This would make loading the vehicle challenging. It would increase health and safety concerns for collection crews as there would be more manual handling, and they would be working at the side of the vehicle rather than at the rear as they do now. This is also a more expensive option. (See appendix 1)

- A '**twin stream**' collection system - this would require 1 additional container as cardboard and paper (fibres) would be collected separately, but glass, cartons, plastics, tins/cans, aerosols would go into the existing recycling container. This would require a new Materials Recovery Facility (MRF).

- 3.9. Alongside the collection responsibilities, PCC is also a disposal authority and along with our disposal partners HCC and SCC will need to make provision of a facility that can process the additional materials. Our current facilities cannot be retrofitted with the appropriate technology and so a business case for a new container MRF is currently being developed. A separate report will be brought to Cabinet later this year.
- 3.10. Along with the other Hampshire local authorities, some modelling work was commissioned to Wood Consultants to appraise a number of options that would meet the likely outcomes of the Environment Bill.
- 3.11. These options considered a number of variations for twin stream and also the kerbside sort option. They have reflected size of required fleet, indicative cost increases, impact on recycling rate and reduction in CO2e. See appendix 1. It is worth noting that Hampshire local authorities currently use the same disposal infrastructure and there are environmental and financial benefits to opting for the same recycling collection method (twin stream or kerbside sort).
- 3.12. The waste team is currently undertaking a project to look at the storage challenges for both households with kerbside collections and communal collections regarding the additional bin requirement. They are also looking at the range of bins available so that more options can be offered to residents.

4. **Reasons for recommendations**

- 4.1. The provision of a twin stream collection service will mean that residents can recycle a wider range of materials.
- 4.2. The Government has recently completed more consultations regarding the Environment bill and it is likely that PCC will need to make significant changes in order to meet the consistency of collection requirement.



- 4.3. Twin stream collection will mean an additional 140l bin for card/paper and the waste team are looking at alternative options for all containers where household have difficulty with bin storage.
- 4.4. Twin stream has been modelled as suitable for all Hampshire local authorities (all Hampshire local authorities share the waste disposal infrastructure) and provides the most cost effective and environmentally beneficial solution to deliver the requirements of the Environment Bill.
- 4.5. A site has been secured and a business case is being developed for a new twin stream MRF.
- 4.6. The provision of additional materials collections will reduce the CO2e by approx.1500 tonnes per annum and contribute to the City's target of net zero by 2030.

7. Integrated impact assessment

- 7.1. An IIA has been completed - a further IIA will be completed once the outcomes of the Environment Bill are fully understood.

8. Legal implications

- 8.1. As outlined in the body of this report and in the Consultation Summary (appendix 2), the Environment Bill, which is currently before Parliament, amends the Environmental Protection Act 1990 to require all waste collection authorities in England to arrange for the collection from households of glass, metal, plastic and paper/card - the four 'core' dry recyclable waste streams. Subject to exemptions to be defined, the legislation will require the collection of items within each such recyclable waste stream separately from items within the other recyclable waste streams.
- 8.2. Following the conclusion of the current (second) public consultation on the consistency of recycling collections, the government will analyse the consultation responses and prepare and publish its response and intentions for the implementation of the new statutory duties in this respect.
- 8.3. Once the Environment Bill has received Royal Assent and passed into law, the government will introduce secondary legislation by way of regulations which will implement the detailed changes. It will also prepare both statutory and non-statutory guidance which will provide further detail as to how the new duties of waste collection/waste disposal authorities will be expected to be carried out.
- 8.4. Given that the full detail of the new legislation and the supporting guidance has yet to be finalised it will be necessary to keep this emerging detail under review in the course of developing of the recommended twin stream collection system and in considering further the implications for the Council's waste disposal functions.



9. Director of Finance's comments

- 9.1. There are no direct financial implications of agreeing the recommendations within the report. The cost of pulling together a business case following the announcement of the Environment Bill will be met from existing cash limited resources.
- 9.2. It is anticipated that changes to the way waste is collected following the enactment of the Environment Bill will likely require additional capital investment and on-going revenue costs. These are not yet known as are dependent on the final outcomes of the bill. The consultations indicate that there will be some New Burdens funding for local authorities to meet these costs although there are no details on how this will work and there is a possibility that some costs may have to be met by the Local Authorities themselves.
- 9.3. The additional capital cost will come in the form of an additional modernised Materials Recycling Facility and work to transfer stations. The Council have already, in their Approved Capital Programme set aside £4.84m for a Single Material Recycling Facility funded from unsupported borrowing on the basis that this investment will lead to reduced disposal costs. It is likely that we will also require a further investment in a Waste Fleet that allows us to collect different waste streams. An amount of £4.125m has been added to the approved programme funded from unsupported borrowing for replacement of the existing fleet, but the additional vehicles that will be required will either be funded from new burdens funding or need additional capital investment.
- 9.4. In order to deliver the required additional waste collections, there will be increased revenue costs as more vehicles and crew will be required. There will also be a need to source a new or additional waste depot from which to operate as the current facility is not large enough to store the additional vehicles that will be required.

.....
Signed by: James Hill - Director of Housing, Neighbourhood and Building Services

Appendices:

- Appendix 1 - modelling comparison data
- Appendix 2 - consistency of consultation summary
- Appendix 3 - Integrated Impact Assessment

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

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



Title of document	Location

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by on

.....
Signed by:

Appendix 1

	Portsmouth	Portsmouth		Hampshire	Hampshire
	Twin Stream	Kerbside Sort		Twin Stream	Kerbside Sort
Recycling rate improvement	+10.5%	+10.5%		+7.1-17.7%	+7.1-17.7%
Co2e reduction	-1528 tonnes per annum	-1588 tonnes per annum		-10866 tonnes per annum	-8098 tonnes per annum
Costs implications	+£616k per annum	+£735k per annum		+£55399k per annum	+£64184k per annum

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Consistency Consultation Summary

Please note Portsmouth is both a waste collection authority and a waste disposal authority.

Introduction

This consultation proposes consistent recycling collections across England to improve the quantity and quality of municipal waste and achieve a national recycling rate of 65% by 2035. The key points of the consultation summarised in the introduction are as below:

- Following the outcome of this second consultation, the Secretary of State will specify the types of materials to be collected within each recyclable waste stream in regulations.
- These recyclable waste streams must, without exception, be collected separately from other household waste and they must be collected for recycling or composting.
- These recyclable waste streams must be collected separately from each other, except where this is not technically or economically practicable, or where there is no significant environmental benefit from separate collection. If a Waste Collection Authority (WCA) relies on one of these exceptions it will need to carry out a written assessment, with compliance assessed by the Environment Agency.
- The Secretary of State may also regulate for additional recyclable waste streams to be collected in accordance with certain conditions and following consultation (i.e. textiles, batteries or waste electricals). This will only be done when the following conditions are met:
 - The waste stream concerned is suitable for recycling or composting and doing so will have an environmental benefit.
 - All WCAs can make arrangements for collection.
 - There is a market for the material.
 - The Waste Disposal Authority (WDA) has been consulted on the impact on disposal/reprocessing.

New Burdens Funding

- Defined as 'any change in a central Government policy or initiative that imposes a net cost on local government and could lead to an increase in council tax'.
- Central Government will fund net additional capital costs (i.e. containers, vehicles) and transitional costs such as communications and re-routing vehicles, to implement the new consistent collection measures.

Part 1: Measures to improve the quantity and quality of household recycling

- The majority of respondents to the last consultation agreed that the materials listed below should be collected from households. The specific types of materials included in each recyclable waste stream are considered further in this consultation.
 - Glass bottles and containers – including drinks bottles, condiment bottles, jars.
 - Paper and card – including newspaper, cardboard packaging, writing paper
 - Metal packaging – steel and aluminium tins and cans
 - Plastic bottles – clear drinks containers, High density polyethylene (HDPE), detergent, shampoo and cleaning products
 - Plastic pots, tubs and trays

- The 2019 consultation proposed that the following additional materials are included in the DMR stream:
 - Foil, foil trays and metal aerosol cans, including packaging items
 - Food and drink cartons
 - Plastic film and flexible packaging

Government proposes these additional items are collected in Dry Mixed Recycling (DMR), ideally from the introduction of extended producer responsibility (EPR). However, views are sought on the transitional arrangements that will be necessary to make this possible.

- Each DMR material that WCAs are required to collect must fall within one of the four recyclable waste streams specified in the Environment Bill (glass, metal, plastic, paper and card) and if they don't, a new recyclable waste stream must be specified by the Secretary of State. For packaging, the EPR scheme will be expected to make recommendations to Government on any additional packaging items that should be included in the consistency regulations.
- **Timing** It is anticipated that consistency reforms for DMR will be introduced by the date that EPR is implemented (i.e. from October 2023), with the exception of plastic film, for which under EPR the timeline is by the end of 2026/27.

Separate Collection of Food Waste

- The Environment Bill requires that food waste must always be collected at least weekly and sent for recycling or composting.
- The preference is for food waste to be collected separately from garden waste, unless not technically or environmentally practicable.
- It is proposed that separate food waste collections would be introduced during the 2023/24 financial year. For authorities for which existing contracts would be affected by the introduction of food waste, it is anticipated they will have food waste in place by the 2024/25 financial year at the latest. These dates include food waste collections to all properties including flats.
- Government is exploring compensation costs for local authorities with long term collection/disposal contracts which may act as barriers to implementing separate food waste collections, where these contracts run beyond the end date for the separate food waste collection requirement.
- Non-statutory guidance will set out examples of good practice for food waste collections and will work with local authorities to help them deliver efficient and effective services.
- Government will ensure local authorities are resourced to meet any new burdens arising from this policy, including up front transition costs and ongoing operational costs.
- Caddy liners will be promoted as good practice and guidance will be provided on caddy liners including material types.

Separate collection of garden waste from households

- Free garden waste collections are still the preferred option due to the carbon benefit, however the issues of this raised in the first consultation responses are recognised, as is the large cost. Therefore, Government is consulting on alternative options, as follows:
 - Produce updated guidance on reasonable charges.
 - Clear communications for households that do not participate in garden waste collections.
 - Increasing home composting.

- The consultation again asks if we agree or disagree with free garden waste (based on 240 litre containers, fortnightly collections, through the growing season), given the costs, recycling benefits and carbon emission reduction if it is fully funded by Government and authorities are able to charge for more frequent collections and/or additional capacity.

Separate collection of recyclable waste from households

- This proposes that certain streams could be exempt from being collected separately, with the two proposed being:
 - Plastic and metal
 - Glass and metal

Statutory guidance and minimum service standards

Defra intend to publish statutory guidance alongside the publishing of the secondary legislation that will enact consistent collections. This section proposes the areas to be included in statutory guidance and the intention to publish non-statutory guidance. Local Authorities must have regard to the guidance when carrying out their waste management duties. The guidance will cover:

- The circumstances in which it may not be technically or economically practicable to collect recyclable household waste streams separately or has no significant environmental benefit.
- The frequency with which household waste other than recyclable household waste which is food waste should be collected.
- The kinds of waste which are relevant waste.
- The type of written assessment required where a waste collector proposes to collect two or more recyclable waste streams together.
- Minimum service standards will be provided on household collections, including flats.

Statutory guidance proposed content 1: Conditions where an exception to the condition that recyclable waste in each recyclable waste stream must be collected separately may apply and where, as a consequence, two or more recyclable waste streams may be collected together

The Environment Bill stipulates that the recyclable waste in each stream can only be collected together if it is not technically or economically practicable to collect separately, or if there is no significant benefit from separate collection. Further detail on the types of examples included under these exceptions will be included in statutory guidance while allowing flexibility for local circumstances.

Technically practicable:

- By technically practicable we mean that the separate collection may be implemented through a system which has been technically developed and proven to function in practice.
- LA's will need to demonstrate that their local circumstances mean that separate collections are not technically practicable. This could apply to one or more areas within a collection service area, rather than the authority as a whole. Examples of this could include:
 - Types of housing stock and accessibility
 - Rurality and geography of property location
 - Availability of suitable containers
 - Storage of containers at properties
 - Storage in existing waste transfer infrastructure

Economically practicable

- This refers to separate collection which does not cause excessive costs in comparison with the treatment of a non-separated waste stream. If the additional cost of collecting a recyclable waste stream separately outweighs its value once collected it may not be economically practicable to collect the waste streams separately.
- LA's will need to demonstrate their specific financial costs makes it significantly more expensive to have separate collections.

No Significant Environmental Benefit

- To make the case that separate collection is of no significant environment benefit compared to collecting recyclable waste streams together, LA's will need to demonstrate that this is the case in their circumstances.
- The overall impact of the management of the household waste stream from collection through to reprocessing should be considered. Examples of this could be included but are not limited to:
 - Greenhouse gas emissions – for example from vehicles or Materials Facilities
 - Lifts per vehicle and journey length
 - Availability of recycling facilities
 - Reject tonnages

Statutory guidance proposed content 2: Compliance and Enforcement

- The Environment Agency is responsible for enforcing compliance with the duties set out in the Environment Bill in England, including assessing local authority written assessments to demonstrate where separate collections are not practicable given the above criteria.

Statutory guidance proposed content 3: Minimum Service Standards for the collection of DMR from households

- Multi-stream collections should be considered in the first instance, however, where these are not technically, economically or environmentally practicable twin-stream should be considered.
- A co-mingled collection should be considered as the last resort.
- Justification for any approach that is not multi-stream will be required through a written assessment.

Statutory guidance proposed content 4: Minimum Service Standards

- Government will consider whether a recommended minimum service standard of AWC for residual collection might be appropriate, subject to an assessment of affordability and value for money.

Review of Part 2 of Schedule 9 (of the Environmental Permitting Regulations 2016: Materials Facilities)

- Under EPR all Materials Facilities that receive waste containing packaging would be considered evidence points. The proposal is that these facilities would be required to undertake sampling and compositional analysis to identify the tonnage and composition of packaging waste.

- A recent review of the requirements under Part 2 Schedule 9 recommended the following to consider:
 - Review the stance on Materials Facilities that are required to report and sample their target material, particularly reviewing small Materials Facilities and whether there should be moves to include them in reporting requirements.
 - Consider more robust and frequent auditing of the results and procedures.
 - Consider publishing the Environment Agency reporting compliance and inspection efforts.
 - Consider more accountability in naming suppliers who input materials to Materials Facilities to increase transparency and waste tracking via the Waste and Resources Action Programme (WRAP) portal.
 - Consider amending regulations to require waste transferred between Materials Facilities to be reported.
 - Consider amending the 2016 Environment Agency guidance to provide clearer guidance on 'target' materials and how to sample and report 'target' materials for consistency across the system.
 - Explore connections between Materials Facility data reporting and EPR data requirements.

Non-Binding Performance Indicators and Alternatives to Weight-based Targets

- Weight-based metrics will continue to play a role as Government has committed to the target of 65% of municipal waste being recycled by 2035. However, other metrics such as carbon emissions are being considered.
- Government will engage with LA's to develop non-binding performance indicators and alternatives to weight-based targets.

Recycling Credits

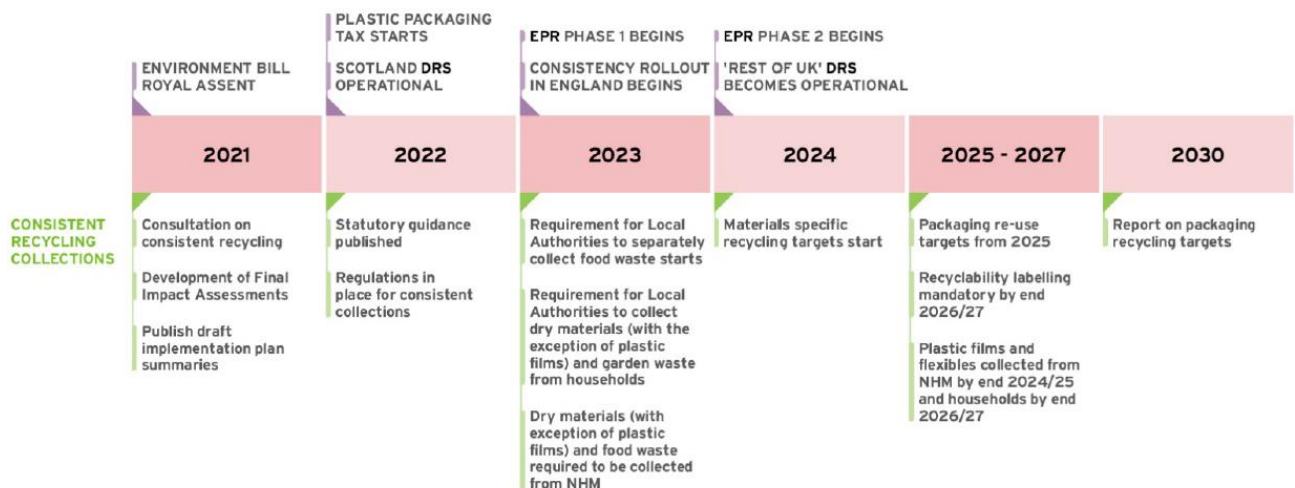
- EPR will bring in a new funding stream to cover the collection and treatment costs for all packaging material collected by local authorities.
- Government has committed to paying the costs of additional new burdens arising from statutory duties in relation to consistency reforms.
- These reforms call into question the continued need for recycling credits and review is necessary to ensure they remain fit for purpose and do not duplicate other funding arrangements. An alternative would be to require local authorities to make local arrangements as necessary for sharing costs and/or savings arising from management of waste other than packaging.
- Any substantive change to the system is likely to require primary legislation.

Bin Colour Standardisation

- It has been decided not to pursue this policy at this stage because of the costs it will incur and the practicalities of rolling out across the country at the same time.
- However, when replacing existing bins, local authorities should consider moving to the most appropriate bin colours to reduce confusion, which might include working collaboratively and procuring with neighbouring authorities or in waste partnerships.
- Government is considering giving guidance on other options such as bin stickers.

Communication and Implementation

- Government with support from WRAP have developed implementation plans for the roll out of consistency measures. These set out the timelines and activities required for the delivery of consistent collections, and addresses major barriers to scheme roll out to increase the likelihood of high performing schemes and ensure high satisfaction.
- The implementation plans outline a broad range of activities under seven overarching themes under which specific activities will fall:
 1. Policy and legislation
 2. Citizen behaviour change
 3. Collections and supporting infrastructure
 4. Improving data
 5. Knowledge, skills, and training
 6. Procurement and contracts
 7. Sector engagement
- A summary of the plans is due to be published later in 2021.
- The implementation plan will be reviewed at regular intervals to measure progress, and timelines will be updated where required.



Delivery of Household Collections

- The implementation plan takes into account collections and support infrastructure, including vehicles, containers, and designers for storage, as well as facility capacity and capability in MRFs and transfer stations. Government will review and update vehicle and container industry capacity to respond to the potential increase in demand.
- WRAP will engage with Local Authorities to support service change, identifying skills gaps and where necessary providing training aids on good practice, upskilling operational staff, and support for service transition plans.
- The Recycle Now behaviour change strategy will be updated and support will be given to national communications.



Integrated Impact Assessment (IIA)

Integrated impact assessment (IIA) form December 2019

www.portsmouth.gov.uk

The integrated impact assessment is a quick and easy screening process. It should:

- identify those policies, projects, services, functions or strategies that could impact positively or negatively on the following areas:
 - Communities and safety
 - Regeneration and culture
 - Environment and public space
 - Equality & - Diversity - This can be found in Section A5

Directorate:

Housing, Neighbourhood and Building Services

Service, function:

Waste Management

Title of policy, service, function, project or strategy (new or old) :

Waste Collection - Recycling Services

Type of policy, service, function, project or strategy:

- Existing
- New / proposed
- ★ Changed

What is the aim of your policy, service, function, project or strategy?

The Environment Bill is currently progressing through Parliament and will legislate for a consistent set of materials to be collected. This will need to be implemented throughout the City from 2023/24.

Has any consultation been undertaken for this proposal? What were the outcomes of the consultations? Has anything changed because of the consultation? Did this inform your proposal?

Defra is carrying out consultation currently. This IIA supports a report into how PCC will deliver the requirements of consistency of collections but is indicative as the Bill has not yet been passed into law

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A1-Crime - Will it make our city safer?

In thinking about this question:

- How will it reduce crime, disorder, ASB and the fear of crime?
- How will it prevent the misuse of drugs, alcohol and other substances?
- How will it protect and support young people at risk of harm?
- How will it discourage re-offending?

If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-spp-plan-2018-20.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How will you measure/check the impact of your proposal?

n/a

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A2-Housing - Will it provide good quality homes?

In thinking about this question:

- How will it increase good quality affordable housing, including social housing?
- How will it reduce the number of poor quality homes and accommodation?
- How will it produce well-insulated and sustainable buildings?
- How will it provide a mix of housing for different groups and needs?

If you want more information contact Daniel.Young@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/psh-providing-affordable-housing-in-portsmouth-april-19.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A3-Health - Will this help promote healthy, safe and independent living?

In thinking about this question:

- How will it improve physical and mental health?
- How will it improve quality of life?
- How will it encourage healthy lifestyle choices?
- How will it create healthy places? (Including workplaces)

If you want more information contact Dominique.Letouze@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cons-114.86-health-and-wellbeing-strategy-proof-2.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A4-Income deprivation and poverty-Will it consider income deprivation and reduce poverty?

In thinking about this question:

- How will it support those vulnerable to falling into poverty; e.g., single working age adults and lone parent households?
- How will it consider low-income communities, households and individuals?
- How will it support those unable to work?
- How will it support those with no educational qualifications?

If you want more information contact Mark.Sage@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-homelessness-strategy-2018-to-2023.pdf>
<https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

The introduction of City Wide food waste collections may have a positive impact of shopping habits when people see how much food they are throwing out but this is anecdotal rather than evidenced.

Additional materials will mean that residents are able to recycle more materials and reduce waste. This may reduce the need for

How are you going to measure/check the impact of your proposal?

We will monitor food waste tonnages in the City and amenity waste levels at the HWRC

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A5-Equality & diversity - Will it have any positive/negative impacts on the protected characteristics?



In thinking about this question:

- How will it impact on the protected characteristics-Positive or negative impact (Protected characteristics under the Equality Act 2010, Age, disability, race/ethnicity, Sexual orientation, gender reassignment, sex, religion or belief, pregnancy and maternity, marriage and civil partnership,socio-economic)
- What mitigation has been put in place to lessen any impacts or barriers removed?
- How will it help promote equality for a specific protected characteristic?

If you want more information contact gina.perryman@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cmu-equality-strategy-2019-22-final.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Possibly, in terms of language barriers and understand what items can be recycled and in what bin. There may also be issues with additional bins for some age groups or those with a disability.

Comms will be largely pictorial to overcome language issues, and exceptions and assisted collections can be put in place where it is difficult for residents to present or move bins

Communications will be available in other languages and braille

How are you going to measure/check the impact of your proposal?

We will review our communications in relation to enquiries/complaints and we monitor the number of assisted collections or exceptions to the scheme that we make

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B1-Carbon emissions - Will it reduce carbon emissions?



In thinking about this question:

- How will it reduce greenhouse gas emissions?
- How will it provide renewable sources of energy?
- How will it reduce the need for motorised vehicle travel?
- How will it encourage and support residents to reduce carbon emissions?

If you want more information contact Tristan.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cmu-sustainability-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

The range of recyclable materials will increase to include kerbside collections for glass, plastics, cans/tins, cartons, film, aerosols along with a separate food waste collection.
Overall it is estimated that Co2e will reduce by just over 1500 tonnes per annum - this covers vehicle emissions and reduction from recycled materials
As more items are recycled, there will be a reduced need to source virgin materials.

How are you going to measure/check the impact of your proposal?
We will monitor the tonnage by waste stream and look to increase recycling. We carry out analysis of what is collected in the refuse and recycling in order to target contamination and lost recycling

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B2-Energy use - Will it reduce energy use?



In thinking about this question:

- How will it reduce water consumption?
- How will it reduce electricity consumption?
- How will it reduce gas consumption?
- How will it reduce the production of waste?

If you want more information contact Triston.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

<https://democracy.portsmouth.gov.uk/documents/s24685/Home%20Energy%20Appendix%201%20-%20Energy%20and%20water%20at%20home%20-%20Strategy%202019-25.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

It should make it easier for resident to recycle a wider range of materials at the kerbside and move items that are currently sent for energy recovery into the recycling stream.

How are you going to measure/check the impact of your proposal?
We constantly monitor refuse and recycling tonnages, contamination levels and review collections rounds

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B3 - Climate change mitigation and flooding-Will it proactively mitigate against a changing climate and flooding?

In thinking about this question:

- How will it minimise flood risk from both coastal and surface flooding in the future?
- How will it protect properties and buildings from flooding?
- How will it make local people aware of the risk from flooding?
- How will it mitigate for future changes in temperature and extreme weather events?

If you want more information contact Tristan.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/env-surface-water-management-plan-2019.pdf>

<https://www.portsmouth.gov.uk/ext/documents-external/cou-flood-risk-management-plan.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B4-Natural environment-Will it ensure public spaces are greener, more sustainable and well-maintained?

In thinking about this question:

- How will it encourage biodiversity and protect habitats?
- How will it preserve natural sites?
- How will it conserve and enhance natural species?

If you want more information contact Daniel.Young@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-solent-recreation-mitigation-strategy-dec-17.pdf>

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Possibly - in terms of better and easier waste management.

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B5-Air quality - Will it improve air quality?



In thinking about this question:

- How will it reduce motor vehicle traffic congestion?
- How will it reduce emissions of key pollutants?
- How will it discourage the idling of motor vehicles?
- How will it reduce reliance on private car use?

If you want more information contact Hayley.Trower@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/env-aq-air-quality-plan-outline-business-case.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Possibly - people will not need to take their glass, cartons or textiles to local bring banks which many people do in the car. However, there may be a small increase in the number of waste vehicles on the road - we are changing fuel which will reduce emissions and considering air quality as part of our future fleet procurement

How are you going to measure/check the impact of your proposal?

We will reduce the number of bring banks once the system is in place and review use, and collection frequency of the bring banks as the system embeds

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B6-Transport - Will it improve road safety and transport for the whole community?



In thinking about this question:

- How will it prioritise pedestrians, cyclists and public transport users over users of private vehicles?
- How will it allocate street space to ensure children and older people can walk and cycle safely in the area?
- How will it increase the proportion of journeys made using sustainable and active transport?
- How will it reduce the risk of traffic collisions, and near misses, with pedestrians and cyclists?

If you want more information contact Pam.Turton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/travel/local-transport-plan-3>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

How are you going to measure/check the impact of your proposal?

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B7-Waste management - Will it increase recycling and reduce the production of waste?



In thinking about this question:

- How will it reduce household waste and consumption?
- How will it increase recycling?
- How will it reduce industrial and construction waste?

If you want more information contact Steven.Russell@portsmouthcc.gov.uk or go to:

<https://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

The change will introduce a wider range of recyclables to be collected at the kerbside. This will divert materials from Energy Recovery to Recycling.

How are you going to measure/check the impact of your proposal?

We monitor tonnages monthly and promote the waste hierarchy
We anticipate an improvement in the recycling rate of up to 10%

C - Regeneration of our city

Yes

No

Is your policy/proposal relevant to the following questions?

C1-Culture and heritage - Will it promote, protect and enhance our culture and heritage?

In thinking about this question:

- How will it protect areas of cultural value?
- How will it protect listed buildings?
- How will it encourage events and attractions?
- How will it make Portsmouth a city people want to live in?

If you want more information contact Claire.Looney@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

n/a

C - Regeneration of our city

Yes

No

Is your policy/proposal relevant to the following questions?

C2-Employment and opportunities - Will it promote the development of a skilled workforce?

In thinking about this question:

- How will it improve qualifications and skills for local people?
- How will it reduce unemployment?
- How will it create high quality jobs?
- How will it improve earnings?

If you want more information contact Mark.Pembleton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

n/a

Is your policy/proposal relevant to the following questions?

C3 - Economy - Will it encourage businesses to invest in the city, support sustainable growth and regeneration?

In thinking about this question:

- How will it encourage the development of key industries?
- How will it improve the local economy?
- How will it create valuable employment opportunities for local people?
- How will it promote employment and growth in the city?

If you want more information contact Mark.Pembleton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

n/a

Q8 - Who was involved in the Integrated impact assessment?

Colette Hill, Rebecca Adams

This IIA has been approved by: James Hill, Director HNB

Contact number: 07899 655761

Date: 17 June 2021

Agenda Item 7



Portsmouth
CITY COUNCIL

Title of meeting:	Cabinet
Date of meeting:	Tuesday 27 July 2021
Subject:	Household Waste Recycling Centre Operations update and booking system
Report by:	James Hill - Director of Housing, Neighbourhood and Building Services
Report Author:	Dave Emmett - Head of Waste Collection and Disposal
Wards affected:	All
Key decision:	No
Full Council decision:	No

1 Purpose of report

The purpose of this report is to provide Cabinet an update on operations at Portsmouth's Household Waste Recycling Centre (HWRC) in light of the Government's Roadmap towards the gradual relaxation of measures to control the COVID-19 pandemic. This includes provision to retain in the short-term the booking system that was successfully implemented during the pandemic.

2 Recommendations

- 2.1 That the Cabinet approves the retention of the HWRC booking system until at least March 2022 to manage customer demand and facilitate continuation of a controlled and safe HWRC operation while visitor numbers are increased as, social distancing restrictions are reduced. This is in-line with our Waste Disposal Authority Partners Hampshire County Council and Southampton City Council.
- 2.2 That the Cabinet approves the reintroduction of access to cyclists on a controlled basis at Portsmouth HWRC, from July 2021, utilising the HWRC booking system.
- 2.3 That the Cabinet notes Hampshire County Council (HCC) have approved the commencement of the £5 charge for non-residents using Hampshire's 24 HWRCs from 1 September 2021. This decision will not impact residents of Portsmouth wishing to use Hampshire's sites because of the joint HWRC and disposal partnership arrangements we have in place with HCC. Hampshire residents will also not be impacted using Portsmouth HWRC. Portsmouth residents will be required to register their vehicle with HCC to use the Hampshire sites, but not if they only wish to use Portsmouth HWRC. Registration is free of charge for Portsmouth residents because

of the reciprocal use agreement with HCC. The Portsmouth HWRC cross-border policy decision was made by the Cabinet Member for Environment & Community Safety on 05 February 2019 - [Household waste recycling centre cross border charging](#).

- 2.4 That the Cabinet notes that HCC has approved the removal of glass banks from Hampshire's 24 HWRCs from 1 July 2021 in line with the previously taken decisions, which were deferred during covid-19 restrictions. This decision will not impact Portsmouth HWRC, and PCC will retain the glass banks at the site because of separate glass collections arrangements we have in place with Biffa, the City Council's waste collections contractor.

3 Background

- 3.1 Portsmouth City Council reopened Portsmouth HWRC on Monday 11 May 2020, in-line with Hampshire County Councils 24 site network following the enforced closure during the national lockdown from 24 March 2020, in response to central Government and industry desire for sites to reopen. New social distancing measures and operational procedures were introduced at all sites in Hampshire including Portsmouth HWRC to protect both the general public and contractors, who operate and service the sites, from contracting Covid-19. To manage demand and address significant congestion issues seen around the site, a booking system was implemented at Portsmouth HWRC from 01 July 2020.
- 3.2 Despite some initial challenges created predominantly by excessive demand the booking system has proved to be very successful. The queuing outside Portsmouth HWRC was eliminated and allowed the additional Colas traffic measures and site security that was required to be removed which significantly reduced the additional cost of service provision. Through close analysis of data and on-site observations, the number of slots available per half hour at the site has been maximised and adapted, with 416 slots bookable per day (around 2,912 per week) bookable up to 7 days in advance. A number of unsolicited compliments have been received from members of the public who find the booking system more convenient and a better customer experience than queuing for long periods of time.
- 3.3 During the pandemic, the number of vehicles and customers able to attend a site at any time was restricted to support social distancing rules. Implementing the booking system in conjunction with the closure of a proportion of parking spaces with barriers assisted in this aim to maintain at least a 1m+ distance between site staff and customers, while eliminating disruptive queuing seen after the initial reopening of sites.
- 3.4 Access to the HWRC has been restricted to vehicles only since reopening in May 2020 in order to ensure that the site operates safely in line with the Government guidelines and to support social distancing recommendations.

- 3.5 The decision to limit access to vehicle users only since the pandemic has not proved to be a significant issue, with just 1 enquiry received regarding cargo bike access. However, as recognised highway users, cyclists wishing to visit Portsmouth HWRCs had not been unduly restricted prior to March 2020, but the volume of customers using bicycles has traditionally been very low. So-called ‘cargo bikes’ have increased in popularity in recent years, enabling customers to bring bulkier items than a regular bicycle would permit.
- 3.6 It should be noted that HWRCs are primarily provided for the deposit of bulky household and garden waste items unsuitable for kerbside waste collections such as furniture and wood, many of which are uncondusive to being carried by cyclists. Carrying heavy and/or bulky items by bicycle can be a risky practice. In Portsmouth the domestic kerbside recycling service, small electrical item collections and recycling points provided (glass, textile, carton, media) offer a convenient and effective alternative for small recyclable items.

4. Reasons for recommendations

- 4.1 The success of the vaccination programme nationally has been a cornerstone behind the progress of the Government’s Roadmap to relax measures that were implemented to control the virus. As the Government works towards Step 4 in the Roadmap, it is possible that some restrictions could be removed from 19 July 2021 onwards to enable Portsmouth HWRC to increase capacity back to pre-COVID levels. However, despite the continued success of the vaccination programme, Government advisors have warned that there is the potential for some restrictions to return during Winter 2021/22 and for some form of social distancing to continue to be required in the short to medium term or on an ad hoc basis in the future, the booking system is the best and most effective way to continue to manage potential future restrictions.
- 4.2 The booking system has demonstrated that managing customer throughput is effective means of enabling the HWRC to operate more efficiently. Congestion was commonplace at Portsmouth HWRC on sunny weekends and key public holidays, creating delays on the local road network and increased vehicle emissions from idling cars queuing. Booking a slot enables residents to plan with confidence that they can deposit their waste swiftly, easily and with minimal waiting.
- 4.3 It is also proposed that cycles, which are able to safely access the sites using vehicular routes, are reintroduced to Portsmouth HWRC. A small adaptation to the existing booking system would enable cyclists to book a slot in the same way as a vehicle, noting it as a bicycle rather than providing a registration number.

5. Integrated impact assessment

An Integrated Impact Assessment has been completed

6. Legal implications

6.1 There are no legal implications arising directly from the recommendations in the report.

7. Director of Finance's comments

7.1 The cost to the Council of retaining the HWRC booking system until March 2022 would be approximately £6,000, this would be met from the existing Waste Disposal contract budget.

7.2 The reintroduction of cyclist access to the HWRC has no financial impact.

7.3 The amount of income that could be generated from the charge to cross border users is currently unknown, any proceeds from this will be fed back to Hampshire County Council as PCC have not implement the charge at Portsmouth HWRC. It is unlikely to have a material financial impact on the Council because of the location of Portsmouth HWRC away from the County border.

7.4 The current cost of collection of glass from Hampshire HWRC's outweighs the amount of income it could generate from the collection of glass. This will provide a small saving to the overall cost of Waste Disposal across the region but is unlikely to be significant.

.....

Signed by: **James Hill, Director of Housing, Neighbourhood and Building Services.**

Appendices:

Integrated Impact Assessment

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

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

Title of document	Location

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The recommendation(s) set out above were approved/ approved as amended/ deferred/
rejected by on

.....
Signed by:

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Integrated Impact Assessment (IIA)

Integrated impact assessment (IIA) form December 2019

www.portsmouth.gov.uk

The integrated impact assessment is a quick and easy screening process. It should:

- identify those policies, projects, services, functions or strategies that could impact positively or negatively on the following areas:
 - Communities and safety
 - Regeneration and culture
 - Environment and public space
 - Equality & - Diversity - This can be found in Section A5

Directorate:

Housing, Neighbourhood and Building Services

Service, function:

Waste Management

Title of policy, service, function, project or strategy (new or old) :

Household Waste Recycling Centre

Type of policy, service, function, project or strategy:

- Existing
- New / proposed
- Changed

What is the aim of your policy, service, function, project or strategy?

Household Waste Recycling Centre - retention of the booking system and re-introducing cycle access

Has any consultation been undertaken for this proposal? What were the outcomes of the consultations? Has anything changed because of the consultation? Did this inform your proposal?

No

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A1-Crime - Will it make our city safer?



In thinking about this question:

- How will it reduce crime, disorder, ASB and the fear of crime?
- How will it prevent the misuse of drugs, alcohol and other substances?
- How will it protect and support young people at risk of harm?
- How will it discourage re-offending?

If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-spp-plan-2018-20.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How will you measure/check the impact of your proposal?

n/a

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A2-Housing - Will it provide good quality homes?



In thinking about this question:

- How will it increase good quality affordable housing, including social housing?
- How will it reduce the number of poor quality homes and accommodation?
- How will it produce well-insulated and sustainable buildings?
- How will it provide a mix of housing for different groups and needs?

If you want more information contact Daniel.Young@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/psh-providing-affordable-housing-in-portsmouth-april-19.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A3-Health - Will this help promote healthy, safe and independent living?

In thinking about this question:

- How will it improve physical and mental health?
- How will it improve quality of life?
- How will it encourage healthy lifestyle choices?
- How will it create healthy places? (Including workplaces)

If you want more information contact Dominique.Letouze@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cons-114.86-health-and-wellbeing-strategy-proof-2.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A4-Income deprivation and poverty-Will it consider income deprivation and reduce poverty?

In thinking about this question:

- How will it support those vulnerable to falling into poverty; e.g., single working age adults and lone parent households?
- How will it consider low-income communities, households and individuals?
- How will it support those unable to work?
- How will it support those with no educational qualifications?

If you want more information contact Mark.Sage@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-homelessness-strategy-2018-to-2023.pdf>
<https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

N/A

How are you going to measure/check the impact of your proposal?

N/A

A - Communities and safety

Yes

No

Is your policy/proposal relevant to the following questions?

A5-Equality & diversity - Will it have any positive/negative impacts on the protected characteristics?



In thinking about this question:

- How will it impact on the protected characteristics-Positive or negative impact (Protected characteristics under the Equality Act 2010, Age, disability, race/ethnicity, Sexual orientation, gender reassignment, sex, religion or belief, pregnancy and maternity, marriage and civil partnership,socio-economic)
- What mitigation has been put in place to lessen any impacts or barriers removed?
- How will it help promote equality for a specific protected characteristic?

If you want more information contact gina.perryman@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cmu-equality-strategy-2019-22-final.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Possibly, in terms of language barriers and understanding how the booking system works.

There are pictorial Comms on the HCC website as to how the booking can be made to overcome language issues. There is also a dedicated call centre for taking bookings for those residents with no access to the Internet or visual impairments.

How are you going to measure/check the impact of your proposal?

The booking system has been in place since 01July 2020, up to date we have had no complaints from residents regarding not being able to book slots at the HWRC.

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B1-Carbon emissions - Will it reduce carbon emissions?



In thinking about this question:

- How will it reduce greenhouse gas emissions?
- How will it provide renewable sources of energy?
- How will it reduce the need for motorised vehicle travel?
- How will it encourage and support residents to reduce carbon emissions?

If you want more information contact Tristan.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cmu-sustainability-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Congestion was commonplace at Portsmouth HWRCs on sunny weekends and key public holidays, creating delays on the local road network and increased vehicle emissions from idling cars queuing. The Booking system enables residents to plan with confidence that they can deposit their waste swiftly, easily and with minimal waiting.

How are you going to measure/check the impact of your proposal?
Feed back from the HWRC site staff in-terms of reduction of queues.

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B2-Energy use - Will it reduce energy use?



In thinking about this question:

- How will it reduce water consumption?
- How will it reduce electricity consumption?
- How will it reduce gas consumption?
- How will it reduce the production of waste?

If you want more information contact Triston.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

<https://democracy.portsmouth.gov.uk/documents/s24685/Home%20Energy%20Appendix%201%20-%20Energy%20and%20water%20at%20home%20-%20Strategy%202019-25.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

N/A

How are you going to measure/check the impact of your proposal?

N/A

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B3 - Climate change mitigation and flooding-Will it proactively mitigate against a changing climate and flooding?

In thinking about this question:

- How will it minimise flood risk from both coastal and surface flooding in the future?
- How will it protect properties and buildings from flooding?
- How will it make local people aware of the risk from flooding?
- How will it mitigate for future changes in temperature and extreme weather events?

If you want more information contact Tristan.thorn@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/env-surface-water-management-plan-2019.pdf>

<https://www.portsmouth.gov.uk/ext/documents-external/cou-flood-risk-management-plan.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Congestion was commonplace at Portsmouth HWRCs on sunny weekends and key public holidays, creating delays on the local road network and increased vehicle emissions from idling cars queuing. Booking a slot enables residents to plan with confidence that they can deposit their waste swiftly, easily and with minimal waiting.

How are you going to measure/check the impact of your proposal?
Feed back from the HWRC site staff in-terms of reduction of queues.

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B4-Natural environment-Will it ensure public spaces are greener, more sustainable and well-maintained?

In thinking about this question:

- How will it encourage biodiversity and protect habitats?
- How will it preserve natural sites?
- How will it conserve and enhance natural species?

If you want more information contact Daniel.Young@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-solent-recreation-mitigation-strategy-dec-17.pdf>

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

N/A

How are you going to measure/check the impact of your proposal?

N/A

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B5-Air quality - Will it improve air quality?



In thinking about this question:

- How will it reduce motor vehicle traffic congestion?
- How will it reduce emissions of key pollutants?
- How will it discourage the idling of motor vehicles?
- How will it reduce reliance on private car use?

If you want more information contact Hayley.Trower@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/env-aq-air-quality-plan-outline-business-case.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Yes, it will reduce idling cars queuing to entre the HWRC. Additionally, we can see from data that residents are changing their behaviors of how they use the site. Data shows they are using the site less frequently, but taking bigger loads. This is supported by the tonnage data and visitor numbers recorded at the site when compared to previous years, COVID restrictions are account for.

How are you going to measure/check the impact of your proposal?
We will continue to monitor visitor number and tonnages.

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B6-Transport - Will it improve road safety and transport for the whole community?



In thinking about this question:

- How will it prioritise pedestrians, cyclists and public transport users over users of private vehicles?
- How will it allocate street space to ensure children and older people can walk and cycle safely in the area?
- How will it increase the proportion of journeys made using sustainable and active transport?
- How will it reduce the risk of traffic collisions, and near misses, with pedestrians and cyclists?

If you want more information contact Pam.Turton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/travel/local-transport-plan-3>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Possibly - it will increase road safety for the residents and users of Port Solent through reduction/removal of queuing traffic onto the highway network. It will also allow cyclists to entre the site using the booking system.

How are you going to measure/check the impact of your proposal?
Feed back from the HWRC site staff in-terms of reduction of queues.

B - Environment and climate change

Yes

No

Is your policy/proposal relevant to the following questions?

B7-Waste management - Will it increase recycling and reduce the production of waste?



In thinking about this question:

- How will it reduce household waste and consumption?
- How will it increase recycling?
- How will it reduce industrial and construction waste?

If you want more information contact Steven.Russell@portsmouthcc.gov.uk or go to:

<https://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

Retention of the booking system won't itself impact recycling rates or reduction of waste, however lifting of social distancing measures will allow further slots to become available which would enable more residents to use the site.

How are you going to measure/check the impact of your proposal?

We monitor tonnages monthly and promote the waste hierarchy.

C - Regeneration of our city

Yes

No

Is your policy/proposal relevant to the following questions?

C1-Culture and heritage - Will it promote, protect and enhance our culture and heritage?

In thinking about this question:

- How will it protect areas of cultural value?
- How will it protect listed buildings?
- How will it encourage events and attractions?
- How will it make Portsmouth a city people want to live in?

If you want more information contact Claire.Looney@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-post-adoption.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

n/a

C - Regeneration of our city

Yes

No

Is your policy/proposal relevant to the following questions?

C2-Employment and opportunities - Will it promote the development of a skilled workforce?

In thinking about this question:

- How will it improve qualifications and skills for local people?
- How will it reduce unemployment?
- How will it create high quality jobs?
- How will it improve earnings?

If you want more information contact Mark.Pembleton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

n/a

Is your policy/proposal relevant to the following questions?

C3 - Economy - Will it encourage businesses to invest in the city, support sustainable growth and regeneration?

In thinking about this question:

- How will it encourage the development of key industries?
- How will it improve the local economy?
- How will it create valuable employment opportunities for local people?
- How will it promote employment and growth in the city?

If you want more information contact Mark.Pembleton@portsmouthcc.gov.uk or go to:

<https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration-strategy.pdf>

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

n/a

How are you going to measure/check the impact of your proposal?

n/a

Q8 - Who was involved in the Integrated impact assessment?

David Emmett

This IIA has been approved by: James Hill, Director HNB

Contact number: 07775 226 084

Date: 17 June 2021

Agenda Item 8



THIS ITEM IS FOR INFORMATION ONLY

(Please note that "Information Only" reports do not require Integrated Impact Assessments, Legal or Finance Comments as no decision is being taken)

Title of meeting: Cabinet

Subject: The 2021 Annual Status Report of Air Quality

Date of meeting: 27th July 2021

Report by: Richard Lee, Regulatory Services Manager

Wards affected: All

1. Requested by Councillor Dave Ashmore, Cabinet Member for Community Safety & Environment

2. Purpose

2.1. To provide the Cabinet information on the:

- local Air Quality Management (LAQM) process and the 2020 Review and Assessment (R&A) of air quality (AQ) in Portsmouth through the forthcoming publication of the 2021 Annual Status Report (ASR).
- the impact of the Covid-19 pandemic upon the actions undertaken by Portsmouth City Council (PCC) to monitor air pollution levels in Portsmouth during 2020 and the provisional results of the monitoring undertaken during 2020.

3. Information Requested

3.1. The formal submission deadline of PCC's 2021 ASR to Department for Environment Food and Rural Affairs (DEFRA) was 30th June 2021. DEFRA have, however, agreed to take a flexible and realistic approach when there is a risk that this deadline may be missed. The Regulatory Services team is therefore requesting an extension to this timetable as the publication of this year's ASR has been delayed.

3.2. The reasons for the extension are as a consequence of the following:

- delays experienced in receiving the data from involved third parties.
- our data set is greater than many other Local Authorities. We have an extremely robust data collection network and the time to collect and validate the data has taken longer than anticipated.

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- our resource to facilitate this function is limited to 1 FTE.
- other AQ monitoring responsibilities have been required during this period.
- the impacts of the Covid-19 pandemic are relevant.

3.2. As experienced by other Local Authorities, whilst the majority of the 2020 monitoring data has been collated, the final ASR has not been completed in time for formal submission ahead of this meeting. The provisional monitoring data obtained has not been formally validated but is not likely to be subjected to substantive revision prior to its presentation to DEFRA.

4. Impact of Covid-19 pandemic upon data collection

4.1. The provisional results of nitrogen dioxide (NO₂) for 2020 suggests that there has been a significant overall reduction in the levels of NO₂ (the primary pollutant of concern) in Portsmouth during the pandemic. It likely that NO₂ levels, in the vast majority of locations, now falls below the National Air Quality Objectives (NAQO).

4.2. A top-level summary of the provisional results (therefore subject to correction) from our diffusion tube network is provided in Table 1 below:

Table 1 - % of results beneficial (a reduction in levels) and adverse (increase in levels) - see ASR 2020 for category descriptors)

Beneficial	94.56%	%	Adverse	4.08%	%
Negligibly Beneficial	18	12.24%	Negligibly Adverse	5	83.33%
Slightly Beneficial	27	18.37%	Slightly Adverse	1	16.67%
Moderately Beneficial	75	51.02%	Moderately Adverse	0	0.00%
Substantially Beneficial	19	12.93%	Substantially Adverse	0	0.00%

4.3. Changes in level of monitoring activity by the Regulatory Services team during 2020, however, needs to be carefully interpreted in the context of the timeline of the introduction of Covid-19 lockdowns and the various impacts of such.

4.4. Of course, we are aware that the UK government advised against all non-essential travel and contacts on 16th March 2020, closed schools and restaurants on 20th March and announced full lockdown on 23rd March. Consequently we know that many businesses switched to homeworking and many industries ceased or reduced operation during the initial restrictions and the various waves of advice, guidance and restrictions that followed.

5. Reduction in NO₂ production as a result of Covid-19

5.1. Throughout the pandemic, data has been provided showing the reduction in transport activities, particularly road traffic, rail services and aviation, as well as a reduction in overall energy use. In addition, there is a general consensus that the lockdown reduced

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activities and therefore emissions from construction, commercial heating, combustion and processes in industry and power generation may also have fallen.

5.2. The situation for shipping appears more complex with large decreases in activities for some vessel types (particularly offshore, passenger vessels and fishing) and little change in others, depending on cargo type. This is obviously of interest in respect to the contribution of pollution emissions from the Portsmouth International Port.

5.3. Emissions from commercial premises would be expected to be reduced particularly from commercial heating and commercial cooking. With the move to home working, reductions of emissions in commercial areas (shops and offices) will have been partly compensated by increases from homes, but still potentially resulting in a net decrease in emissions.

5.4. Locally it is possible that solid fuel combustion in domestic fires and stoves went up initially after lockdown. However, this initial increase is likely to have subsided with rising ambient temperatures during the summer and may also be limited by fuel stocks. Nuisance reports linked to bonfires and burning of garden waste appear to have risen during the various lockdowns.

6. Analysis of NO₂ pollution concentrations

6.1. When considering the analysis of ambient pollutant concentrations and their potential change due to COVID-19 interventions, it is important to understand the general climatology. Meteorological factors are of direct importance when considering changes in pollutant concentrations due to COVID-19 for all sites and all pollutants and therefore when assessing the resultant levels for 2020 we have considered these.

6.2. As stated above, we recognise that air pollutant concentrations may have been impacted by the change in activity observed as a result of the COVID-19 pandemic and the associated measures. We therefore note that these are highly likely to have led to changes in compliance with our Air Quality Local Plan strategy objectives in our Air Quality Management Areas (AQMA) in the year 2020.

6.3. As per DEFRA's national technical guidance (LAQM.TG(16)1), current guidance states that it expects us to consider measurements carried out over a period of three to five consecutive years particularly when deliberating the revocation or amendment of an AQMA, as well as national trends in emissions and measures introduced.

6.4. Accordingly, should our levels, once published, demonstrate a reduction in levels we should follow DEFRA's advice advising against the revocation of any AQMA based solely upon compliance being achieved in 2020, as this year may not be representative of long-term trends in pollutant concentrations and we must be confident that air quality objectives will continue to be met in future years.

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6.5. When publishing our data it is therefore important to make clear how monitoring has been impacted by the COVID-19 pandemic and to highlight the fact that the data should be treated with caution. An impact matrix has been developed to assist with this process. It is important that we acknowledge that data from 2020 year may differ significantly when compared with historical trends.

7. NO₂ monitoring data set corrections

7.1. In respect to our passive monitoring diffusion tube data, guidance exists where poor data capture has occurred. Where data capture is less than 75% of the year (which has occurred in Portsmouth in a high number of locations) annualisation techniques have been used to estimate an annual mean based on current guidance. We must have a minimum of three months of data available for annualisation, however the ability to annualise data in line with current guidance has also been impacted by COVID-19. We have considered the impacts of amending the criteria for annualisation, however, DEFRA suggests that their current guidance remains valid.

7.2. The diffusion tube data processing tool has been used to process diffusion tube data. The tool has been developed to more easily calculate annual mean concentrations for the diffusion tube monthly data, by amalgamating the following individual LAQM processing tools: *the annualisation tool; the precision and accuracy tool – calculation of local bias; and NO₂ fall off with distance calculator*. In respect to diffusion tube bias adjustment it is suggested by DEFRA that diffusion tube bias adjustment studies have been affected by COVID-19.

8. NO₂ data collection complications

8.1. During 2020 we have experienced problems with the deployment of diffusion tubes, as a result of supply, analytical laboratory support and the availability of resource needed to be deploy such. DEFRA have anticipated this and confirmed that is no expectation that we should expose diffusion tubes in line with the 2020 diffusion tube monitoring calendar dates. The diffusion tube data processing tool or LAQM annualisation tool will automatically perform a time-weighted annual mean calculation, as opposed to a simple average calculation, if the required criteria are met.

8.2. COVID-19 has given rise to changes in our typical continuous monitoring procedures, service and maintenance regimes, calibration regimes and independent auditing regimes. These monitoring procedures and data collection have also been impacted by the upgrading of our stations during 2020 and we are working through the impact of these on our continuous monitoring data. We will therefore be considering the need to review our approaches to such and the technical guidance on continuous monitoring found in LAQM.TG(16)1.

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9. NO₂ results communication summary

9.1. Our provisional data sets demonstrate a significant reduction in NO₂ levels across a number of key hotspot locations and those within the geographic area of the forthcoming clean air zone. In order to communicate clearly with the public on the potential impact of the COVID-19 pandemic on the data capture and the quality of monitoring data collected during 2020, DEFRA have produced advice on how to contextualise impacts on monitoring data from diffusion tubes and continuous analysers.

9.2. Within the publication of the 2021 ASR we will therefore indicate that readers need to treat data with more caution than usual, for example where data capture was less than 75% or tubes have been exposed outside of the usual time periods, or a combination of both.

.....
Signed by (Director)

Appendices:

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

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

Title of document	Location
LAQM Technical Guidance (TG16) - updated April 2021	Technical Guidance LAQM.TG(16) Online Viewer - Defra, UK
2020 ASR	2020 Air Quality Annual Status Report (ASR) (portsmouth.gov.uk)

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Agenda Item 9



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Title of meeting: Cabinet

Subject: Port Health Readiness - Delivery of Official Controls

Date of meeting: 27th July 2021

Report by: Richard Lee, Regulatory Services Manager

Wards affected: All

1. Requested by Councillor Dave Ashmore, Cabinet Member for Community Safety & Environment

2. Purpose

2.1. To provide the Cabinet information on the:

- responsibilities of Regulatory Services as the Port Health Authority (PHA) in respect to delivering *official controls* on various food products entering the Portsmouth International Port (PIP) following the UK's exit from the EU.
- challenges faced by the PHA in respect to achieving operational border readiness in compliance with the UK Government's prescriptive timetable.

3. Introduction

3.1. The requirement for new UK Border Control Posts (BCPs) was announced in 2020 by the UK Government. A package of financial assistance was provided to Port Operators tasked with building the necessary multi-million-pound port BCP infrastructure by 1st January 2022.

3.2. The development of the BCP is being delivered by the PIP team and is scheduled to be completed by the end of November 2021. The design and size of the BCP must meet exacting minimum statutory requirements which have been calculated through predictions of importation levels, product types and the funding available.

3.3. Currently there are approximately 20 seaport BCPs and 10 airport BCPs in the UK, many of which are also developing their facilities to ensure the forthcoming official border controls can be delivered. Failure to develop and competently staff these BCPs will result in the importation of goods requiring checks being suspended or delayed at the point of entry. In this regard, the UK Government have raised concerns about the possibility of

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food supplies being compromised if there is UK-wide disruption to the checking and release of food consignments.

4. PHA responsibilities

4.1. As PHAs, Portsmouth City Council (PCC) is legally responsible for undertaking checks upon certain high-risk food and feed products, and live animals (if imported), as they enter the PIP. Currently, the most important of these are Sanitary and Phytosanitary (SPS) checks.

4.2. PCC works with other agencies such as Animal Plant Health Agency, Border Force and other PHAs to ensure food consignments are efficiently transited and unsatisfactory consignments are traced, intercepted, and detained.

5. SPS checks

5.1. The import and export of live animals, products of animal origin, some plants and other agri-food products will be subject to additional checks at PIP BCP to ensure they comply with food safety and biosecurity regulations. This is because these products could pose a risk to public, animal or plant health.

5.2. SPS measures include pre-notification to PHAs before goods are imported (via the Import of Products Animals, Food and Feed Systems (IPAFFS) system in the UK and the Trade Control and Export System (TRACES) in the EU, and need to move through a BCP equipped and resourced to handle the specific goods imported. At our BCP, goods may be subject to:

- **100% Documentary checks** (to ensure the goods have the correct paperwork, such as an health certification for animals and animal products, a phytosanitary certificate for some plants and plant products and a catch certificate for fish and fish products)
- **Identity checks** (to ensure the goods presented match those on the documentation)
- **Physical checks** (to ensure the goods comply with SPS rules). The rates of physical inspections vary by product.

6. Timetable for checks

6.1. *From October 2021:* Imports of products of animal origin and high-risk food not of animal origin will require pre-notification to the PHA via IPAFFS and must have correct health certification - all documents must be checked, verified and approved. *From January 2022:* Additionally, most products will be subject to identification and physical checks. *These timelines were deferred earlier this year from April 2021 and July 2021 respectively.*

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7. Process

7.1. The government have published the processes for controlled commodities which the PHA have a responsibility to deliver. These are in part outlined in the Border Operating Model. Portsmouth PHA is required to design operational effectiveness processes to deliver the SPS checks to ensure compliance with the government's auditable statutory requirements. This is a significant challenge, as obviously, this is the first time these checks have been necessary via the roll-on roll-off operations at the PIP.

8. Estimating demand for official controls

8.1. Initial calculations made by the UK Government in late 2020 in respect to the importation of consignments through the PIP indicated that a minimum of 35 new staff were required to enable delivery of the required PHA official controls 365 / 24hr.

8.2. The operational need for a continuous service is being assessed, however, the most recent estimations suggest that these calculations may be only 50% of what is actually arriving at the PIP and therefore the demand upon the PHA may be far higher than expected.

8.3. Future import levels are however currently uncertain which is highly significant as all processes including service delivery models and financial appraisals are based upon the predicted demand for official controls created by the number / quantity of goods being imported. Some limited data in respect to manifested imports is being collated. Current conservative predictions are that the PHA will be responsible for >10,000 consignments checks / controls entering the port each year.

9. People

9.1. Since November 2020 the PHA have been implementing a significant recruitment process which will double the size of the existing Regulatory Services team - potentially swelling the staffing cohort from approximately 30 to 65 FTE. This process has been extremely time consuming and is significantly impacting upon business as usual resourcing needs and service delivery.

9.2. The existing management team is attempting to absorb these and all other PHA functions / planning into their existing roles. We know that the specialist qualified officers demanded by the government are extremely difficult to recruit, however, conversations in respect to the qualification / competency of officers is becoming clearer and we are hopeful of further beneficial progress on this matter shortly. A new statutory competency framework for officers delivering official food controls was introduced in March 2021 by the Food Standards Agency which will form the basis of competency assessments for port staff moving forwards.

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9.3. Approximately 20 of the new cohort are inexperienced officers with no knowledge of SPS checks and the delivery of such. All staff will require substantial training once the operational delivery mechanisms have been designed by the UK Government. The necessary qualified officers, such as official veterinarians, will also require development and conversion training, as whilst they may have been familiar with previous export controls they will not be cognisant of the new import delivery regulations required by the government.

10. Place

10.1. It is clear that animal and fish products (live, hanging meats, chilled / frozen / ambient), allergens, pesticides, plant health etc. will all have specific facility needs. Many of these are included within the design specifications of the BCP, however, a degree of uncertainty remains and concerns are being discussed as to whether the BCP will be able to accommodate all necessary requirements. The statutory minimum requirements relating to the design of the BCP infrastructure have however been met and are awaiting sign off by the government before the building becomes operational.

10.2. Various working arrangements require formulation locally as to how the various regulators share the BCP facilities and how thereafter these are managed. After taking occupancy of the BCP we conservatively estimate that it will take 12 months before the PHA will reach reasonable levels of operational effectiveness.

11. Products & Systems

11.1. We have an awareness of IPAFFS, however, this will require significant additional training before we feel confident with its use. The government's IPAFFS delivery team are currently designing the system and thereafter the training materials which, once published, we will have to familiarise ourselves with.

11.2. Currently we remain concerned that IPAFFS has limited facility for organic products or fish catch certificates which we will have to compensate for. The system in place of TRACES involves manual documentary checks in the interim which is also resulting in readiness delays. Additionally, we do not have access to other systems containing consignment information complicating demand and operational need calculations. Unfortunately, we are aware that IPAFFS will not currently connect to our PCC Uniform IDOX database and therefore manual input will be required until this is resolved. The PCC IT team are aware that until this is resolved financial management of the PHA will be compromised.

12. Finance

12.1. In October 2020 the government provided the PHA £477k for staffing in the first 3 months of 2021. This equates to an estimated PHA staffing cost of £2million per annum.

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We remain in regular discussions with the UK Government's Home Office and Cabinet Office officials in respect to the likely costs of staffing during 21/22 and we are seeking assurances that they will pay for these costs during the 21/22 period - i.e. until the BCP is fully operational. Additionally, we are seeking supplementary funding for delays in delivering these checks as a result of the revised timetable detailed by the government at the beginning of this calendar year (*referenced in Section 6.1*).

12.2. PHA financial scrutiny is paramount, as the expectations of the government are that operational costs, from 1st April 2022, will be met through a charging mechanism (invoicing agents for the delivery of SPS controls) based on a full cost recovery model. Staffing costs are likely to increase further if a 365 24/7 operation is required.

12.3. Reference to the calculation of importation demand is particularly relevant to this process and the financial security of the PHA moving forward. A fee and charging mechanism is being designed in line with those delivered by other UK BCPs to recover costs from the delivery of the official controls. There remains, however, some significant doubt that these mechanisms will recover sufficient costs as a result of the uncertainties of the demand for official controls.

12.4. The government have requested information to enable an estimate of our additional funding bid to deliver these new responsibilities during 21/22. This has been submitted. In summary, they consist of the previous funding provided (20/21), minus staffing costs (21/22), plus predicted income (21/22) resulting in a bid estimate of 21/22 of approximately £385k.

12.5. Income generation through fees and charges, as previously mentioned, are "*best guesses*" at this point in time due to remaining and ongoing uncertainties in respect to the demand for official controls. The current calculations suggest that an income of £293.5k is possible in 21/22.

12.6. Early approximate (as many variables are in play) assessments suggest that our income levels per year, from 22/23, may be in the region of £600k whilst operational costs (mainly staffing) are likely to be approximately £1.6million, therefore resulting in a £1million predicted shortfall. Whilst significant uncertainties are in play, this provides an early narrative of the magnitude of the financial challenges which are likely in the future assuming, of course, that income levels and staff resource need remain static and are as currently predicted.

12.7. Concerns have been communicated in respect to increasing fees and charges to recover all PCC PHA costs, as increasing costs significantly above those charged by other BCP's will create an un-level playing field and may encourage agents to import via a more financially attractive BCP facility, ultimately reducing the viability of the PIP.

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12.8. We are continuing to discuss our future funding needs with the government for these services as the demand for chargeable controls becomes clearer. Currently, from our dialog to date, it is far too early to determine whether future shortfalls incurred whilst providing these official border controls will be financed by the government beyond 22/23.

12.9. Our income predictions will become more accurate as importation levels become clearer, as:

- we begin to have better sight of IPAFFS.
- we further develop our charging mechanism in line with the other PHAs.
- the official control regime formally begins (1st October and 1st January) and import / export levels can be tracked and predicted with greater accuracy.

13. Financial summary and recommendation

13.1. This report acknowledges that, at this time, there are several unknowns around the ongoing financial impact of this activity. The net shortfall for 21/22 is estimated at £385k and a submission to DEFRA for funding has been made. An indicative shortfall of £1million per annum from 22/23 is based on current estimates of required staffing levels, traffic volumes and potential charging rates. Therefore a further report will be brought back to members when more information is available regarding the ongoing financial impact and the options / proposals for meeting any shortfall are identified.

14. Conclusions

14.1. Whilst significant challenges and levels of service development need to be overcome and delivered prior to the 1st October, 1st January and for many months thereafter, we remain committed and optimistic in respect to our direction of travel towards PHA operational readiness.

14.2. Our current predictions of readiness are regularly being discussed and assessed by a wide range of UK Government departments, including the Border & Protocol Delivery Group and the UK PHA working group. Significant and sustained progress has been made over the last 7 months and we are confident that continued advancement can be achieved.

14.3. Whilst we remain positive, the complexity of the challenges we, along with many other UK BCPs, are facing should not be underestimated. The financial security of the Portsmouth PHA is questionable at best at this point in time and the certainty of full readiness in line with the government's expectations currently remains unclear.

.....
Signed by (Director)

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

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

Title of document	Location
Border Operating Model	<u>The Border Operating Model - GOV.UK</u> <u>(www.gov.uk)</u>

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Agenda Item 10



THIS ITEM IS FOR INFORMATION ONLY. (Please note that 'Information Only' reports do not require Equality Impact Assessments, Legal or Finance comments as no decision is being taken.)

Title of meeting: Cabinet Meeting

Subject: Annual Fostering Service Report

Date of meeting: 27 July 2021

Report by: Jackie Clarke

Wards affected: All

-
- 1. Requested by:** Lead Member for Children, Families and Education, Portsmouth City Council
 - 2. Purpose:** The report provides a summary of the work undertaken by the Fostering Service for the period 01/04/20-31/03/21.
 - 3. Information Requested:** Activity of the Fostering Service to be noted in terms of the service contribution to the Corporate Parenting Strategy regarding the care of Looked After Children. This report is to be linked with the three monthly report to be provided to the lead member in accordance with The Fostering Service (England) Regulations 2011, Review of Quality of Care Regulation 35 and in accordance with the National Minimum Standards for Fostering Service 2011 25.7a-c.
 - 4. Introduction: Portsmouth Fostering Service**

The Fostering Service's primary function is to recruit, assess and support approved carers for Portsmouth's Looked After Children. The Service comprises three teams:

- **Recruitment and Assessment-** this team is managed by one team leader with five social workers and two social service assistants and is responsible for the recruitment of potential foster carers, participating in the recruitment campaigns, responding to all potential carer enquiries, initial home visits and initial statutory training and assessment of potential carers. This team works closely with a fostering marketing officer who supports with development and delivery of annual foster carer recruitment strategy for 'Foster Portsmouth'.
- Foster carers are assessed and approved for the number of children for which they have the skills, qualities, experience and physical space to care. This could be between 1 and 3 children (four if siblings). They are generically approved for the age range 0-18 but the assessment enables the assessing social worker and prospective carers to draw out their suitability and preferred age range of children.

- Carers' skills and experience are also taken into account and they can be approved as levels one, two or three and their allowances and skills fees reflect that. The higher level represents those carers with substantial skills and experience of caring for children and these carers look after children with particularly complex needs and need a high level support- they tend to be children age 10 and over and particularly vulnerable to adult criminal exploitation. There are also specialist parent and child carers offering homes to vulnerable parents of a Looked After Child whilst the parent is assessed and supported to care for their baby/young child.
- **Access to Resources and Fostering Support Team.** This is the family finding pod -comprising one team leader and four team members with responsibility for identifying suitable carers for looked after children. This pod works very closely with the Fostering Support Team comprising one team leader, 13 social workers with the statutory responsibility for supervising approved carers and supporting them to be equipped to meet the needs of children through access to comprehensive learning programme and access to a range of support within the Looked After Children Service. All carers are required to have an annual review of their approval and this process is undertaken by one higher grade social worker who sits within this team. The Fostering support team also provides an out of hours on call service offering advice and guidance to the carers.
- **The Connected Persons Team (including Special Guardianship Support, Private Fostering and Step-Parent Adoption).** Managed by one team leader this pod comprises seven social workers and one social service assistant. This team works very closely with the children's teams to identify and assessment potential family members as carers for Looked After Children unable to return to live with parents. These family members are assessed as formally approved connected persons' carers and receive supervision and support as foster carers or obtain legal responsibility to care for the child via a special guardianship order. Those with special guardianship order are supported by the special guardianship support worker. Some families may make informal arrangements for their child to live with a friend or extended family member and therefore enter into a Private Fostering arrangement, private foster carers are assessed by a member of this team as are those families seeking step parent adoption.
- All prospective and approved carers are scrutinised in terms of carers preparation, support, supervision and suitability of carers via an independent Fostering Panel a statutory forum which meets a minimum of twice per month to consider the assessments of prospective foster carers, the annual review of foster carers, any concerns regarding the continued suitability of approved foster carers. The panel also considers the plans for a child/ren to remain living with their carer on a long term basis until they can return to their family or move into independent living as an adult. The panel also considers applications of supported lodgings carers, offering semi-independent home to older teenagers/young adults in preparation for independent living.

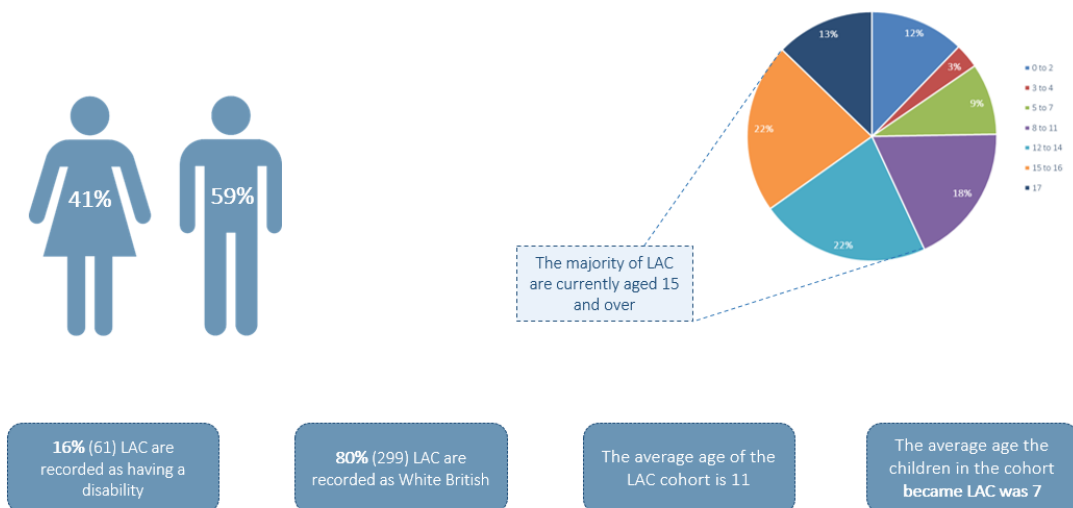
- 4.1** Children of varying ages and backgrounds are received into the care of the Local Authority with the agreement of parents voluntarily and/or via a care Court Order, in order to provide a safe and stable substitute family home for as long as that child needs. When a child becomes looked after the priority is to ensure a stable placement, access to health and education and to work positively with the child's parents and family to therefore strengthen their family relationships and enable the child to return to parents' care or to the wider family network when safe to do so.
- 4.2** The responsibility of the Fostering Service is to recruit, support and review suitable carers to provide a safe, high standard of care to the children, affording them opportunities to achieve their potential and support the children to return home or move to alternative permanent care, and/ or be supported into adulthood, according to each child's unique needs.
- 4.3** The Fostering Service provides a safeguarding role for those children not looked after but living away from their parents. The Connected Persons Team assess and support family and friends carers for those children unable to live with their parent. These carers will become Special Guardians and be granted a court order to provide them with legal responsibility or there may be a more informal arrangement as a private foster carer whereby the parents retain all legal responsibility. In line with assessing carers who are related to the child, the Fostering Service took on the responsibility of Step Parent Adoption in 2020. Our Fostering Service is integral to Portsmouth's Corporate Parenting Strategy. This report will provide summary information regarding recruitment and assessment of carers, areas working well and new developments for 2020/2021 and areas for further development 2021/2022.
- 4.4** As of 31/03/21 Portsmouth has 237 fostering households which is an increase from 211 from the previous year. Those 237 households potentially offer homes for Looked After Children. However each carer household will be approved for a specific number of children according bedroom availability, preferred age range of child and the skills and experience of carers in meeting children's needs. Those fostering households will also offer variation in terms of short term, long term, respite care. Some of those households will be carers specifically approved to care for child/ren within their family network.
- 4.5 Understanding our Looked After Children Cohort:**
- 4.6** The number of Looked After Children at 31/03/21 was 378 - with 235 placed with Portsmouth foster carers, 13 in external residential children's home, 28 with independent fostering agency carers (IFAs), 5 in PCC residential children's home, 5 in residential school placements. Out of 378 LAC, 132 had been looked after continuously for 2.5 years, of those 81 (61%) had achieved long term stability, placement stability is an ongoing focus for the Local Authority.

4.7 Breakdown of our placement types for Looked After Children:

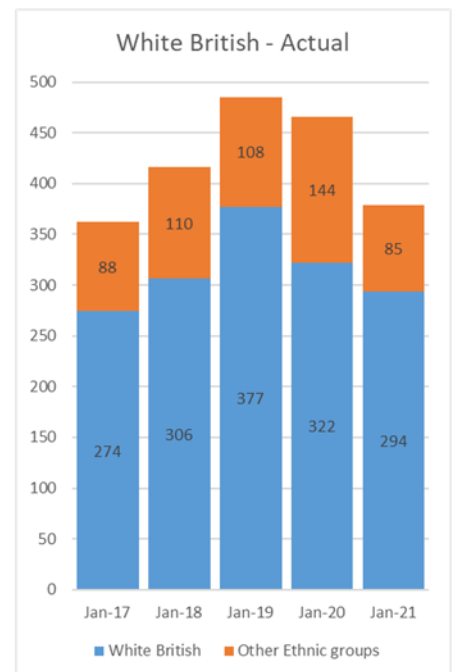
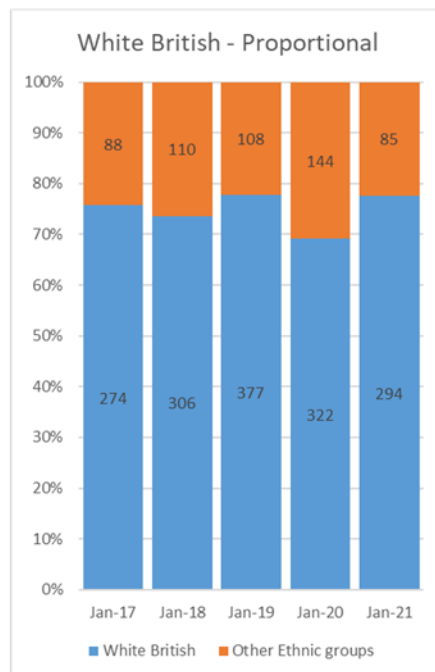
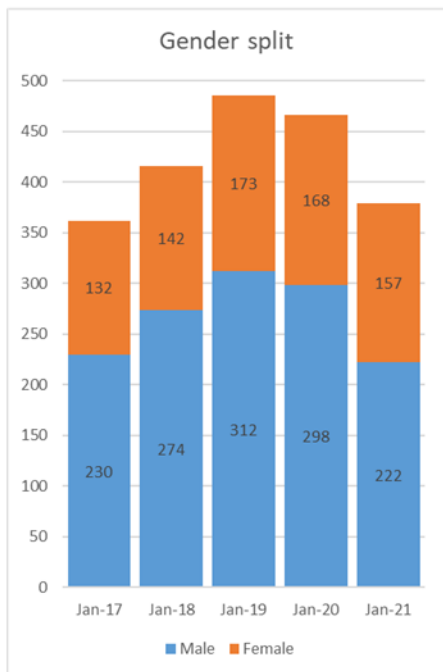
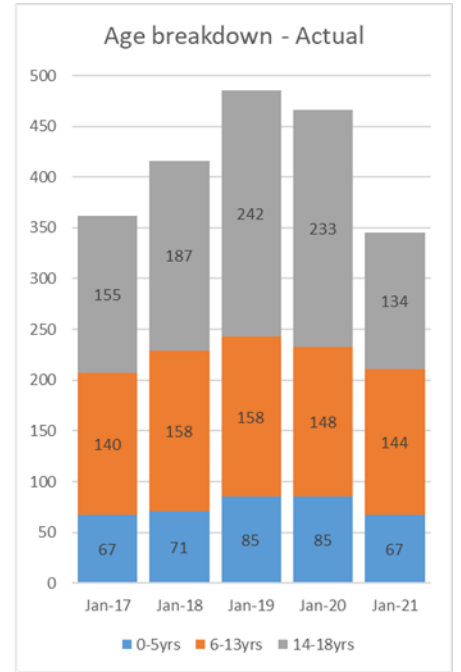
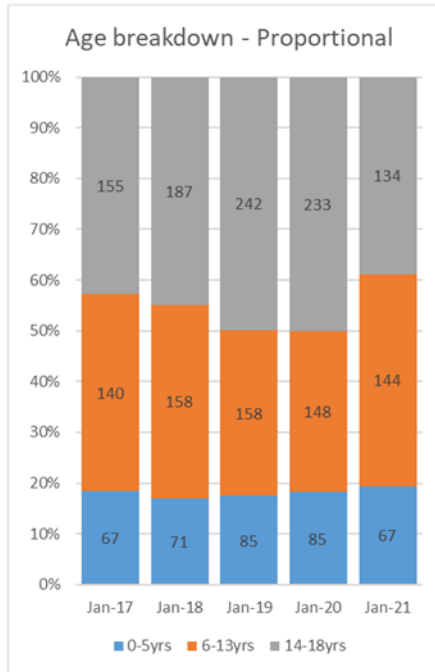
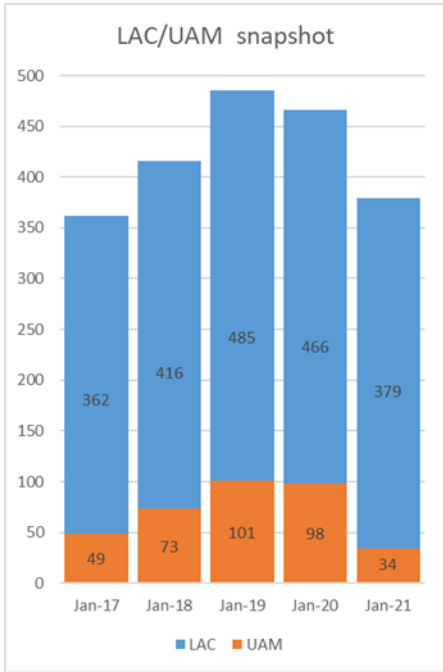
Accommodation Type (for under 18s)	Is placement IFA?	No	YES	TOTAL
Placed for adoption with placement order (under section 21 of the 2002 Act) with current foster carer		4	0	4
Placed for adoption with placement order (under section 21 of the 2002 Act) not with current foster carer		6	0	6
Placement with other foster carer, provided by LA (carer lives inside LA boundary)		7	0	7
Placement with other foster carer, provided by LA (carer lives outside LA boundary)		4	0	4
Placement with other foster carer, arranged through agency (carer lives outside LA boundary)		0	3	3
Residential accommodation not subject to 'Children's homes regulations'		22	0	22
Children's Homes subject to Children's Homes Regulations		23	0	23
Placed with own parents or other person with parental responsibility		40	0	40
Placement with other foster carer		5	0	5
Young Offender Institution or prison		1	0	1
Foster placement with relative or friend- long term fostering		34	0	34
Foster placement with relative or friend- not long term or FFA		11	0	11
Foster placement with other foster carer- long term fostering		126	13	139
Foster placement with other foster carer who is also an approved adopter- FFA		1	0	1
Foster placement with other foster carer - not long term or FFA		56	12	68
Other placements (must be listed on a schedule sent to DH with annual submission)		10	0	10
Total		350	28	378

4.8 The Looked After Children Profile shows a snapshot profile of our cohort of children:

Looked After Children Profile



4.9 The breakdown age ranges, gender and ethnicity of our Looked After children snapshots over the last 5 years are as follows:



5. Recruitment and Assessment

5.1 Carer recruitment is supported by a fulltime marketing officer who leads on the development and delivery of an annual carer recruitment strategy. The planned strategy for the 20/21 included:

- Radio campaign with Express Radio, Heart and Hits Radio throughout the year including advertising recruitment events and interviews with carers
- Radio campaign to promote FosterCare Fortnight in May with carer interviews
- Digital marketing enhanced -proactive social media -Portsmouth's Facebook, Twitter pages promoting fostering
- Video interviews of carers uploaded to Foster Portsmouth
- Carer interviews featured in Portsmouth News and Portsmouth Flagship and other local publications -education Term Times
- Live recruitment events arranged throughout the year at Portsmouth Football Ground, Spinnaker Tower , Hilton Hotel Portsmouth, Southsea Market, Portsmouth Pride Festival, Victorious Festival, The Great South Run, all followed up via monthly recruitment information events at Civic Offices
- New 'FosterPortsmouth' posters designed and displayed across the city
- Carers incentive to recommend a friend promoted to all existing carers

5.1 In view of the global pandemic and the national Covid-19 safety lockdown implemented March 2020 and subsequent national restrictions for public safety face to face recruitment events did not go ahead but monthly virtual recruitment events were introduced by August 2020.

5.2 Although there were changes to the recruitment strategy the subsequent enquiries for information to become a foster carer remained fairly consistent for 2020/2021 -a total number of 274 enquiries were received. Those enquiries are followed up by direct contact with member of the recruitment team and a home visit would be arranged for those wishing to proceed. That home visit could then lead to the formal assessment. Marketing research shows it can take 2-3years for a prospective foster carer to make the decision to apply to foster after gathering information. Each local authority and independent fostering agencies compete for prospective carers. For example Portsmouth will seek to recruit carers from within the city but also within a twenty mile radius of Portsmouth.

5.3 In terms of marketing and recruitment for foster carers the national conversion rates from enquiry to initial visit is 1in 4 (25%) and 1 in ten (10.5%) from enquiry to approval. The table below illustrates for Portsmouth the conversion rate for 2020/2021 was 14.6% for enquiry to home visit and 10.6% for enquiry to foster carer approval. The lower conversion figure for enquiry to home is due to the impact of the Covid restrictions and the initial suspension of all face to face recruitment and face to face visits and time to implement virtual visiting. However the total outcome of foster carer approvals was only

marginally lower than the previous year whereby there were 31 approved fostering households.

5.4 The Minimum Care Standards guidance for the timescale for foster carer assessment is a total of 8 months for the two stage assessment process. Stage one is for the safeguarding statutory checks to be completed- DBS, medical report and references and stage 2 the initial training and home/family assessment. Portsmouth implemented a practice standard of a total of 6 months for an assessment to be completed (4 months for a carer transferring from another agency). The average timescale for assessments completed for this year was 5.5months.

6. Foster Carer Recruitment

Year	Enquiries	Initial Home Visits	Approved	IHV Conversion Rate	Approved Conversion Rate
2020/2021	274	40	29	14.6%	10.6%
2019/2020	269	60	31	22.3%	11.5%
2018/2019	336	71	11	21.1%	3.3%

6.1 In terms of new carers being approved there were 29 new fostering households approved. Of those approved 3 were carers transferring from another fostering agency. Whilst there has been a national shortage of foster carers the approval number is close to the previous year 2019/2020 whereby 31 households were approved and a sustained increase on the year 2018/2019 whereby 11 households were approved.

With regards to connected carers there were 15 carers approved, an increase from the previous year 2019/2020 of 14 carers approved.

For supported lodgings carers, there were 3 households approved, the equivalent number were approved the previous year 2019/20.

Therefore in terms of mainstream carers, including supported lodgings carers there were a total of 32 new carer households approved for looked after children for 2020/2021.

Including connected carers in newly approved carer households there was a total of 46 carers approved. In addition there were 11 special guardianship carers approved by the courts. Therefore Portsmouth fostering Service have 58 new caring households for looked after children in the year 2021.

6.2 There were 4 private fostering carers approved and no step parent adoption applications made. Step parent adoption may not be the preferred legal option for those

families as there are now other legal Orders -parental responsibility, special guardianship and child arrangements orders that may be more suitable and reflective of the diversity of family life.

6.3 In considering the newly approved mainstream fostering households the breakdown of the type of carer they are offering and the numbers of children and their preferred age range of children the information is detailed below:

6.4 Foster carer approval type

2020/21	Total number of carers	Respite/Short Term	Short term/long term	Respite/Short Term/Long Term/Supported Lodgings	Parent and child	FamilyLink/Respite
	32	15	8	3	2	3

7. Connected Carers

7.1 When children become looked after and become subject of care proceedings the department will explore the potential for those children to live within their wider family (connected persons) in the event of them not returning permanently to live with parents.

7.2 For the period 2020 /2021 a total of 53 assessments were initiated of potential connected persons. Of those assessments 20 potential carers withdrew from the process, 6 were not needed as the children remained with parents on a care order, 6 remained with parents, and 2 remained with foster carer and 2 children remained with foster carer. There were 15 connected persons formally approved as carers for related child/children and 11 connected persons assessed and approved by the court as Special Guardians.

7.3 Connected persons who do not have an established relationship with the child are more likely to be recommended to be approved as formal carers and therefore receive all the support as 'stranger' foster carers to enable them to establish a relationship with the child and meet the child's needs. The statutory reviews of the child's care plan should consider the timing for supporting the child to leave care via the carers applying for special guardianship.

8. Carer retention

Year	2018	2019	2021
Fostercarer households	218	211	237

- 8.1** At 31/03/21 there were a total of 237 foster carer households and increase from the previous years. This figure takes into account a total of 42 carers deregistered.
- 8.2** 10 carers were deregistered because they either adopted the child/ren or secured special guardianship for the children they cared for, 3 carers transferred to other agencies and the others resigned due to retirement, health or changes in personal circumstances. Two carers were deregistered due to care standards concerns. In 2019 there was a total of 82 carers deregistered. Portsmouth's retention of carers is good and the majority of new carers are recruited through word of mouth from our existing carers.

9. Complaints/Concerns/Allegations against carers

- 9.1** There were 6 complaints made against carers that resulted in a review of their approval. Of those 2 carers were deregistered due concerns regarding their standards of care. One carer submitted but subsequently withdrew their application to have the review reconsidered by the Independent Review Mechanism (IRM). However, in view of the timing of the withdrawal the case was heard by the IRM and the recommendation was deregistration.
- 9.2** The number of concerns and complaints regarding carers has increased over the course of this year and it may be reflective of the uncertainty, stress and pressures of the significant changes on living arrangements, relationships, employment and health and loss on the population in general due to the Covid-19 pandemic. The children being looked after have complex needs and at times their behaviours can be challenging for carers. Complaints against carers can range, for example an inappropriate response to a child i.e shouting at the child, being negative about birth family or a safeguarding issue where the child has been harmed or at risk of harm due to the carer's action, i.e reacting inappropriately to a child's behaviour. For those where their approval was reviewed and agreed to continue demonstrates the restorative approach Portsmouth has embedded in working with families.

10. Strengths of the Fostering Service

- 10.1** Despite the global pandemic the recruitment of carers has remained similar to the increased numbers approved 2019/2020. In order to improve recruitment and assessment experience the foster carer assessment the practice standard timescale of six months to complete assessments was introduced in September to ensure timeliness of assessment.
- 10.2** In conjunction with the Fostering Network Portsmouth have implemented the Mockingbird Model of Care based on an extended family/community type of care. This involved developing a 'constellation of carers' with children with the overarching support of a 'home hub carer' who facilitates support, social activities, learning opportunities and sleepovers for children. A team leader was recruited with specific responsibility to lead

on the development of the model. Although the pandemic restrictions delayed the initial plan to launch in September 2020, the team leader was able to engage carers, recruit the first home hub carer and satellite carers and children and begin to develop those relationships and build the constellation which enabled the first constellation to launch in January 2021 comprising 10 carers with a total of 16 children. Within this constellation children experience a more normalised experience - able to build relationships with other children within the group, have sleepovers and opportunities to meet with their siblings and family members with the support of the home hub carer either in the carer's home or community.

10.3 Mockingbird Hub 1 breakdown:

Portsmouth Fostering Service Mockingbird Programme January 2021	
Number of foster families	9
Total current carers	17
Current number of children looked after	10
Total children who have been supported by the Programme	10
Number of birth children	4
Number of care leavers	0
Children who are adopted	0

10.4 The carers build relationships with each other and offer support within the group. They identify their learning needs and are supervised by Mockingbird Team Leader appointed in October. The initial evaluation since the launch in January has been very positive with feedback from the carers, children and parent has been very positive. The Mockingbird Model of Care is designed to promote placement stability and to date there are two children who were very vulnerable in terms of placement stability but with the matching and support in setting up the first constellation those carers are experiencing the holistic support and the children are experiencing new opportunities to develop friendships within the safe nurturing community Mockingbird promotes. Feedback from the carers, children and parent of those children have given very positive feedback:

- 'I've also really enjoyed having the same people around for training and social events I think it brings us all closer and gives a good sense of support and community which is what mockingbird was set up to achieve. ' foster carer feedback,
- 'The children loved every minute of it today. When we normally go to contact the children hardly talk about it but they were buzzing in the car all very positive. We all think Mockingbird is a great idea'.

10.5 Portsmouth Fostering Service is the only fostering service on the south coast offering the Mockingbird model of care programme, this makes Portsmouth Pioneers of the South Coast.

10.6 The Fostering Network Mockingbird Programme Evaluation Report 2020 identified the average number of Mockingbird Constellations is 3 per service or agency and the

intention for Portsmouth was to have 3 hubs within the first year. The covid-19 pandemic had impacted on this roll out, and this report sets out the plans for our next 2 hubs.

10.7 The Fostering Network Evaluation report identified that nationally 12% of carers within Mockingbird would have resigned without the Mockingbird support available and 1 in 5 (20%) placements would have broken down, with 5 children moving to a residential provision. This shows the ongoing benefit of this model to Portsmouth Looked After Service, and the cost implications are set out below:

Retention of foster carers	£16,330 per family	<i>The Cost of Foster Care (Tapsfield and Collier, 2005) adjusted in line with GDP changes</i>
Improved placement stability	£875	<i>Estimated cost of placement changes range from £250 to £1500 per change (Ward, Holmes and Soper, 2008). Median value has been applied</i>
Prevention of entry into residential	£177,464	<i>Annual cost of residential minus annual cost of foster care (Personal Social Service Research Unit: Unit Costs of Health and Social Care)</i>

10.8 There are monthly steering groups comprising carers from within Mockingbird and other carers, members of children's services, carer leaver and participation officer and representatives from our partners in health and education to support with the evaluation and development of Mockingbird with the aspiration of creating further constellations to meet the diverse needs of children. Carers are keen to join Mockingbird and there are two further constellations to be launched in July.

10.9 This model is a great example of co-production in terms of planning and service delivery. Our foster carer contribution to the development of children's service is highly valued and there is carer representation on the Corporate Parenting Operational Group meetings, the Looked After Children Virtual Education Service. Our Foster Carer Liaison Group meets six weekly to enable carers to raise any service issues and contribute to service development. Our carers support with recruitment events and delivery of training.

10.10 Our carer retention is good and from the Children and Families' February Feedback 92% carers said the Fostering Service was 'excellent' or 'good', 93% carers said training since approval has helped me to meet the child and young person's needs'.

10.11 Feedback is valued by the service and in response to carers request for carer mentoring Portsmouth introduced a formal carer mentoring scheme to support carers not within the Mockingbird Model. A cohort of experienced carers has been recruited to support newly approved carers for an initial period when the carers have their first child join their family. Carer mentors will also be offered to carers experiencing some challenges and needing additional support.

11. Support and training for carers, Trauma Informed Model Of Care and Looked After

Children CAMHs.

- 11.1** In recognition of the trauma experienced by children needing to be looked after and care and support those children need all Portsmouth carers have access to the Trauma Informed Model Of Care training offered across the Children ,Families and Education Service. Equipping carers with knowledge and tools to care for children who have experienced trauma enables carers to support the children with complex needs and support them through some challenging times and promotes placement stability. TIMOC training is also boosted by TIMOC consultations available to carers on a one to one basis with the senior clinical psychologist for TIMOC.
- 11.2** The Looked After Children CAMHS service also offers monthly consultations for carers and the Virtual School offers monthly drop in sessions for carers and deliver Forming Good Attachments training for carers.
- 11.3** As part of strengthening relationships there are monthly drop in sessions and training opportunities facilitated by the Service Leader of Battenburg Contact Centre to support carers with developing relationships with Looked After Children's family members to enable carers support children maintaining relationships with their family and potential reunification.
- 11.4** The carer training offer has been supported by recruiting a social worker with a lead responsibility for linking with the learning and development department to development and support delivery of carer training. Carers also have access to the on line Research in Practice website. Face to face training ceased due to the pandemic and was transferred on line in August 2020. The appointment of a part time lead social worker in the fostering support team has enabled more flexibility with training offered in terms of times but also a focus on delivering workshops to support carers completing their Training Standards Development (TSDs). In recognition of connected carers and their needs and wishes, a connected carers support group has been established and connected carers may choose to have their own TSD workshops.
- 11.5** The impact of the pandemic and the national and local lockdowns instigated a significant change in ways of delivering the service during the periods where Covid restrictions were in place. This was through virtual recruitment, assessment and support visits, virtual meetings and virtual or on line training and virtual fostering panels. However where essential for the child and/or carer face to face visits were made subject to a Covid risk assessment. For example where there was a concern for the child or carer a face to face visit was made and no assessment was submitted to fostering panel or court without a minimum of one face to face visit.
- 11.6** The Fostering Panel has continued to meet throughout the pandemic, initially via telephone conference and then via video conferences. A total of 27 panels has been held with a total of 157 applications to panel that including carer applications for approval, foster carers household reviews, long term linking for children, and staying put for care leavers and review of carers subject to complaints and allegations.

11.7 As lockdown restrictions reduce there has been learning and some practices will remain as they are beneficial to the service - for example developing a blend of face to face training and virtual training and carer support groups.

12. Carers Household Reviews

Each fostering household must have their approval reviewed annually and over the course of this year there were a total of 29 Household Reviews completed and increase from 18 completed the previous year. The flexibility offered by virtual meetings has enabled all those involved to meet at times not restricted by travel.

13. Service Stability

The fostering service has a relative stable staffing structure. The vast majority of team members have been within the team for three years or more. There has been changes in the management team with a new Service Leader and two new Team Leaders.

14. Areas for development

14.1 Boost foster carer recruitment to develop a diverse population of carers to meet the needs of diverse population of children needing to be looked after including unaccompanied minors and for 16-18year olds, especially those at risk of exploitation. The recruitment strategy was disrupted by the impact of the pandemic but also changes in the marketing officer post. However the marketing officer post has now been secured and the marketing strategy for 2021/2022 is being developed.

14.2 Mockingbird Model of Care sustainability and embedding the model across the service the six monthly review of the first constellation and those due to launch will inform the future developments of the Fostering Service.

14.3 Placement stability improvement; the fostering Service has reviewed the children's referral format and matching process within Access to Resources and has implemented weekly matching meetings to consider potential matching of children with carers and potential additional support that could be provided to secure placement stability. Placement planning meetings have been strengthened to include the team around the child to ensure carers have all the information they need and support in place. There is a review mechanism to check in within two weeks of that meeting. The supervising social worker and child's social worker work together to identify any key triggers that could potentially destabilise a placement and any of those triggers i.e change in carers circumstances, change in child's circumstances should trigger a placement support meeting to include all those involved in the care of a child to boost the support plan and prevent a placement 'wobble'. This practice needs to become embedded across the Looked After Service.

14.4 Learning from Success; Many children flourish with the carers and engage well with their education and develop good relationships with friends and their family. In

response to carers' feedback the department is beginning to hold reflective meetings in relation to those situations in order to share the learning and broaden success for all looked after children and carers.

- 14.5** Development of accommodation available for care leavers. Continuing to work with our business partners in housing, and with the provider network we are growing in the city to ensure there are safe and supported accommodation offers for our growing number of care leavers. This will include an increased offer of Staying Put arrangements.
- 14.6** The new electronic records system for children and carers went live March 2020 and adaptations are in process to ensure the system meets the needs of the Fostering Service. In addition an electronic system for carers that will enable carers to submit expense forms, carer recording, training records has been in process of development and is due to be in place 2021.
- 14.7** Carers feedback has informed the service that virtual working serves a purpose but carers value face to face social events resuming i.e carers lunches, training and carer support groups and social events for children. Carer support groups have resumed as has some face to face training. The carer liaison group would like blended meetings to be introduced.

15. Conclusion

- 15.1** The Fostering Service has sustained its recruitment and retention of carers for the year 2020/21 and is broadening the training and support offer to carers to enable carers to meet the complex needs of children. The introduction of the Mockingbird model of care promotes the carer community support including learning and social activity, offering an extended family type model of care for children that is inclusive and promotes children's relationships with their own family whilst they need to be in care.
- 15.2** The impact of Mockingbird in terms of initial evaluation and feedback from carers, children and family members is positive and enabling further Mockingbird constellations to be developed. The Fostering Service Support and development of carers has received positive feedback from the carers and service development is informed with contribution of carers and children.
- 15.3** There is recognition that placement stability needs to improve and the service reviews it's practice and process to boost support with the bespoke TIMOC training and support from our partners in health and education to build the team around the carer.

.....
Signed by (Director)

Appendices:

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

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

Title of document	Location

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THIS ITEM IS FOR INFORMATION ONLY. (Please note that 'Information Only' reports do not require Equality Impact Assessments, Legal or Finance comments as no decision is being taken.)

Title of meeting: Cabinet Meeting

Subject: Annual Adoption Agency Activity Report March 2021

Date of meeting: 27 July 2021

Report by: Sara Sweeney Service Leader, Through Care Team One

Wards affected: All

1. Requested by:

- 1.1. It is required by Standard 25.6 of the Adoption National Minimum Standards 2011 for Local Authority Adoption Services that the executive receives a six-monthly written report outlining the management and performance of the adoption agency.
- 1.2. The Lead Member is asked to note the performance of the Portsmouth Adoption Agency in terms of:
 - a) Update regarding the second year of Adopt South Regional Adoption Agency
 - b) Reducing waiting times for children being placed with adoptive families.
 - c) Sustained number of children adopted in contrast to the national picture slightly lower in line with national trend.

2. Purpose

- 2.1. The previous report was presented March 2020. This report will update the Lead Member on Portsmouth Adoption Service activity for the period 1 April 2020 to 31 March 2021.

3. Background

- 3.1. Practices in adoption have continued to receive government attention since the Government's Adoption Reform Programme 2012 to promote stable, permanent care arrangements for children unable to be cared for by their birth families. In the DfE paper 'Adoption - A Vision for Change' the government outlined expectations for improved practices measured through the introduction of the National Adoption Scorecards and the development of regionalised adoption agencies.
- 3.2. Portsmouth Children and Families Service were subject to Ofsted inspection September 2018 and the service was graded as 'Good'. With regard to the adoption service the Ofsted report stated:
- 3.3. 'Children who need adoption benefit from timely decision-making and effective planning. Good assessment, training and support is available for prospective adopters. Children move quickly to live with their adoptive families and they enjoy stability. Good use is made of the adoption support fund to meet children's therapeutic needs. Close work with CAMHS, the virtual school, educational psychologists and play therapist holistically supports carers to meet their children's needs'. The

regionalisation of Portsmouth adoption service is an opportunity to further develop the service provided for Portsmouth children and their families.

- 3.4. In June 2015, the Department for Education (DfE) published 'Regionalising Adoption' and asked all adoption agencies in England to consider how to work more closely together on a regional basis. This was enacted as the Education and Adoption Act 2016, which authorised authorities and voluntary adoption agencies to join together to form Regional Adoption Agencies (RAAs). Hampshire County Council, Isle of Wight Council, Portsmouth City Council and Southampton City Council adoption services came together along with the voluntary adoption agencies Barnardos and Parents and Children Together (PACT) to establish Adopt South Regional Adoption Agency (RAA).
- 3.5. Adopt South went live on 1 April 2019 and became responsible for specific aspects of adoption to improve outcomes for children and families involved with adoption. The key functions for Adopt South are the recruitment, assessment and support of prospective adoptive families and the post adoption support services for adopted children and their families. Adopt South has a centralised marketing and recruitment team dedicated to identifying potential adoptive families for children needing adoption within each of the four local authorities. The Adopt South children's family finding team is directly linked to each local authority children's adoption team to ensure suitable potential adoptive families are identified as soon as possible promoting timely matching and placement for those children. Furthermore those children adopted and their families now have access to Adopt South's comprehensive post adoption service comprising a range of support that includes adopter mentoring, consultations with CAMHS and Education Psychologists, therapeutic parenting programmes, informal support workshops and social events.
- 3.6. The two key benefits of Adopt South to Portsmouth has been the removal of the competition between the four local authorities for adoptive families through having one centralised Adopt South recruitment and marketing strategy and the pooling of resources to enhance post adoption support services available to families across the Adopt South region. These centralised services have meant that for 2020/21 that the vast majority of Portsmouth children needing adoptive families have continued to move to adoptive families within an improving timescale in line with Government timescales and adoptive families have access to local Adopt South support services.

4. Areas that are doing well

- 4.1. The timeliness and number of Looked after Children leaving foster care to adoption has generally continued to be in accordance with Government Adoption Scorecards. Please see appendix 1.
- 4.2. The number of children adopted during the year 2020/21 was 18. This cohort of children included two sibling pairs. Two of the children were in reception at school the others were under 4. The number of Portsmouth children adopted during this period is a decrease from the previous year whereby 25 children were adopted but is in line to the national trend.
- 4.3. For the period 2020/2021 there were 19 children matched with adoptive families whereby applications for adoption orders were in the process of being submitted to court. This included a sibling group of two school age children who had been waiting for two years for a family. Whilst the time will have impacted Government led timescales, the extensive search to identify an adoptive family represents a positive outcome for each child.
- 4.4. As at 31 March 2021 there were 7 children waiting for adoptive families to be identified. This included a sibling pair who have complex emotional needs and three children with significant health and development needs This is in line with the previous year when there were 5 children awaiting an adoptive family. The complexity of need is an influencing factor.
- 4.5. For some young children unable to live with their birth family it is possible for them to be placed in Fostering for Adoption Placements (FfA). These are adoptive families who are also approved temporarily as foster carers for a specific child. Fostering for Adoption can offer the best opportunity for the child if the court decides they need to be adopted as the child can be placed with an approved adoptive family whilst parents and wider family members are being considered. The child remains in

one placement whilst decisions are being made rather than being placed with a foster family and then move to an adoptive family should the court decide the child needs adoption. For 2020/21 there were four Portsmouth children matched with Fostering for Adoption families in contrast to two the previous year

4.6. In comparison with the 2019/20, the number of Portsmouth children with a plan of adoption endorsed by the court has decreased in 2020/21 from 20 to 18, which reflects the national trend in the reduction in number of children leaving care for adoption. When children come into care, reunification to birth parents or permanence with a member of the child's extended family will always be explored before an adoption plan is agreed. This reflects the legal duty placed on the court to only grant an order agreeing for a child to be placed for adoption when it is satisfied the child cannot live with birth family or within the wider family.

4.7. Portsmouth's timeliness for children being adopted has continued to improve. The government threshold measurement in number of days from the date the child entered care to the date the child is placed with an adoptive family is 426 days. For the 2020/21 period Portsmouth's timescale is 402 days, although well within the Government threshold it does represent an increase from the previous year 2019/20 of 396 days. The increase is explained by a sibling pair having waited for two years for a family.

The other timescale is the number of days the court agrees a child to be placed for adoption and the local authority agreeing to the potential match with an adoptive family which has a threshold of 121 days. For Portsmouth the timescale for 2020/21 is 204 days in contrast to 208 days 2019/20.

4.10 The national pandemic Covid-19 lockdown restrictions prevented any children from being placed for adoption for a number of weeks. However, following this initial impact care planning has continued throughout and there are no concerns with timeliness for placement or placement matching for Portsmouth children.

Both sets of timescales compare favourably with the England national average timescales published August 2020 for the year 2018/19 by the government Adoption and Special Guardianship Board (ASGLB) at 433 and 173 days. Please see *appendix 1*.

4.11 During 2020/21 the vast majority of children have been placed with Adopt South adoptive families which means those children remain placed within the geographical region and those families will already have knowledge of and access to the Adopt South support service. Therefore adoptive parents are more likely to access support before a crisis point and the risk of adoption breakdown will be reduced.

4.12 The local authority also has a responsibility to track post adoption disruption rates, however these numbers are not always accurate, as there is no obligation for parents to report these. The most informed way found to calculate the disruption rate is as follows:

- Children re-entering care from an adoptive placement- and the care plan changes to something other than rehabilitation to adoptive parents.
- Those young people that adoption support teams are aware of who may have left their adoptive families to informal arrangements- such as returning to birth family (they can't informally return to birth parents as birth parents no longer have PR so come in via frontline services. The government doesn't collect data regarding those specific children as above) or staying with friends or extended families.

4.13 According to this criteria the post adoption disruption rate in the Adopt South region is 0.6 %, this is pre adoption order. The national disruption rate identified by Julie Selwyn in Beyond the Adoption Order

is still the most up to date research. It is calculated at 3.2%. Therefore in the Adopt South Region, our post adoption order disruption rate is 81% lower than the national average.

5 Adopt South

- 5.1 The Regional Adoption Agency has removed the competitive element of the four local authorities recruiting adoptive families, as Adopt South has a centralised recruitment team. In 2020/21 Portsmouth Children's Services assessment team approved 16 adoptive families, contributing to Adopt South's overall total of 117 adoptive families being approved. For Portsmouth this has enabled children to be placed with families across the regional area. The relationships forged between the local authority children's adoption teams and Adopt South family finding team and adopter assessment teams means that information sharing for potential matching is comprehensive, robust and expedient. The adopter assessment process has been enhanced and standardised by sharing the good practice between the four local authorities quality assured through the Adopt South centralised Adoption Panels and Agency Decision Maker. Equally the Adopt South family finding team working with the children's adoption teams has promoted improved practice to ensure children's information needed for family finding is comprehensive and will fully inform an adopted child as an adult about their birth history and adoption.
- 5.2 Adopter recruitment is measured against the Government threshold of a two stage assessment totalling six months. For Adopt South the average assessment timescale for 2019/20 was 5.3 months. In 2020/21 the time has reduced to an average of 3.8 months. This means the Adopt South family finding team is able to identify potential families at an early point and there has been increase in choice of potential families for children. The approval of adoptive families within timescales feeds into the improving timescale for children being placed with those families. Those children and their families are supported within a shared ethos of delivering a co-ordinated and high standard adoption support service throughout the process of adoption and beyond. Prospective adoptive families are linked with an adopter mentor and training opportunities from the point of assessment offering support all the through to beyond an adoption order thereby enabling families to regard adoption support as a familiar and accessible service at any point as an adoptive family.

6 Adoption Support

- 6.1 Many children needing adoption come from families with complex backgrounds where they have experienced trauma due to ongoing neglect, characterised by domestic abuse and drug and alcohol abuse. Research shows the impact of those experiences can have a significant impact upon the child's development and these children need nurturing, resilient and stable families able to care for the child through to adulthood and sometimes beyond. As children are matched with prospective adoptive families it is imperative for those families they are able to access support. Adoption Support Fund interventions are being requested upon placement and pre Adoption Order with greater frequency possibly owing to the very different experiences of introductions and placement under Covid-19 restrictions.
- 6.2 Adopt South has strengthened adoption support services. Portsmouth currently has 142 adoptive families eligible for adoption support. Families may request an assessment of their support needs at any time. Adoptive families can now access training programmes, workshops; mentoring and support groups, one to one support, consultations with educational psychologists and CAMHS practitioner commissioned by PCC, and social activities. Many of the Adoption Support services previously provided Face to Face have been adapted to be delivered virtually including the "Adopting Changes" therapeutic parenting programme as well as workshops on Life Story, Teenagers and social media. PCC staff have worked with colleagues across the region to deliver these workshops and training.
- 6.3 For 2020 the Government gave a boost of 4.5million to the Adoption Support Fund which has enabled families to continue to access specialist therapeutic support. During 2020/21 there has been a total of £49.465.75 granted for Portsmouth families. The ASF and the number of families accessing funding for specialist support is a reflection of the complex needs of adopted children. Adopt South has centralised the four local authorities ASF process and developing support service that would be sustainable should the ASF reduce or come to an end.

- 6.4 This support including therapeutic parenting programmes, one to one therapeutic support for children, sensory integration therapy and specialist assessments. We have noticed an increase in families requiring support for child on parent violence- a known factor for Adoption family breakdown. In response we have used the Adoption Support fund to obtain the therapeutic NVR (Non Violent Resistance) programme in order to support these families with positive results The ASF has been particularly beneficial enabling those families living outside of the geographical region to receive specialist therapeutic support.
- 6.5 It is of note that some of our children really struggled with the transition back into school and out again due to lockdown. There were 9 families supported through Portsmouth CAMHS consultations over the previous financial year, mostly via phone calls as face to face was not possible. The team have further supported another 8 families across the region where there are significant mental health issues including self-harm , eating disorders , suicidal thoughts , suicide attempts, school refusal (long term) and anxiety in children and depression , anxiety and mental health breakdown - (parents)..
- 6.6 Adoption Services continue to learn from the work in supporting adopted adults and birth family members who were involved in adoption (Birth Records Counselling and Intermediary Service). Currently this service for Portsmouth sits outside of Adopt South. Between 2020/21 there were been 13 referrals received for birth records counselling and intermediary work and workers are holding an ongoing caseload of 20. It is likely that this figure has been impacted by the Covid 19 lockdown. Many court and social care archives have been closed during Covid, which has affected our ability to make progress for some of our clients. There is an increasing number of young adopted adults accessing their adoption records. These younger adults are more likely to have been adopted through care proceedings and it is evident that they are seeking to understand the detail in decisions made to separate them from birth parents particularly when separated as siblings. It is notable that more recent childcare files are voluminous in comparison with those adopted in the 60's and 70's, whilst this is positive for the young person in understanding their life story it makes the task of providing the permitted information significantly more complex.
- 6.7 Post adoption contact with birth family members is promoted from the outset of a child being placed for adoption in order for the child to develop a clear understanding of their birth family and sense of identity. The majority of adopted children will continue to have indirect contact with birth parents and siblings up to the age of 18 through a letterbox exchange co-ordinated by the adoption service. There were 258 adopted children involved in letterbox contact culminating in 953 active exchanges over the course of the year. We are very proud of being able to maintain the Letterbox service during the pandemic when access to the office was limited for many months. This was achieved by driving the usually paper based service to email; this was done with great care and attention to detail, owing to the particular importance of confidentiality in this aspect of the work.
- 6.8 At present the Birth Records Counselling and Intermediary Service and the Post Adoption Contact Service exchange sits outside of the Adopt South remit. However now that adopter recruitment; assessment and support; family finding and post adoption support is established Adopt South are proposing both those service areas to become part of Adopt South Post Adoption Support from 2021. The benefits will be adoptive parents being able to access consistent support relating to the lifelong needs of adopted children.

7 Notable outcomes for Adopt South

- Placed heavier emphasis on digital advertising with the use of more focussed messaging and placement in regional press, parish magazines, 3D Reach and digital news networks
- Evolving strategies both in recruitment and placement for greater diversity including increased number of BAME, ethnic and LGBT+ adopters
- Low number of disruptions at just 2 this year
- Evaluation of Adoption Support's intervention increased adopters rating of their average day by 85%

- 186 applicants/adopters now being supported by 35 Volunteer Mentors
- Stage 1 assessments continue to encourage new applicants to consider placements of siblings, older children and children with additional needs, giving greater scope for placement
- Training pathway increasing applicant's knowledge
- Speedier matching - Family Finding Team continue matching and all 4 Local Authorities within Adopt South have continued to be under Government thresholds for matching
- Centralising the Adoption Support Fund and the COVID-19 Scheme

7.1 Adoption Support Fund and the COVID-19 Scheme

The Adoption Support Team worked with a range of providers to commission 122 virtual interventions to form the COVID-19 package, this was as result of recognising the additional impact that Covid-19 would have on families.

EP Consultations

1-hour virtual consultation with two Educational Psychologists, support is provided to parents, and other professionals as required.

Behaviour Support

Block of 6 virtual sessions for parents with specialist providers covering pre-school, primary and secondary age children. The intervention uses strategies from the Great Behaviour Breakdown parenting approach as well as support around crisis co-regulation, mind-set change, conflict resolution, trauma driven response.

Sensory Regulation

Block of 6 virtual sessions for parents with specialist Occupational Therapists focusing on emotional regulation.

Therapeutic Support

Block of 6 virtual sessions for parents to provide support strategies specifically to support the COVID-19 situation. The strategies drew upon DDP, therapeutic parenting and the neuro sequential model to support parents. Therapeutic support also included two Teen groups of 6 sessions specifically aimed at teenagers, facilitated by a Clinical Psychologist. The groups focus was on stress management, mindfulness, building self-esteem and self-compassion, distress tolerance and emotional regulation.

Counselling

Block of 6 virtual sessions for parents to support with issues around social distancing, employment pressures, relationship difficulties, loss & bereavement.

In-House Parenting Support

An increased range and volume of in-house interventions provided by Adopt Support South's Post Adoption Team, including virtual support groups, bespoke consultations, the Adopting Changes programme (adapted to be delivered to individual families virtually), and weekly information sent out on Adopt South's database. The underlying theme of the in-house parenting support was focused on attachment and trauma informed parenting.

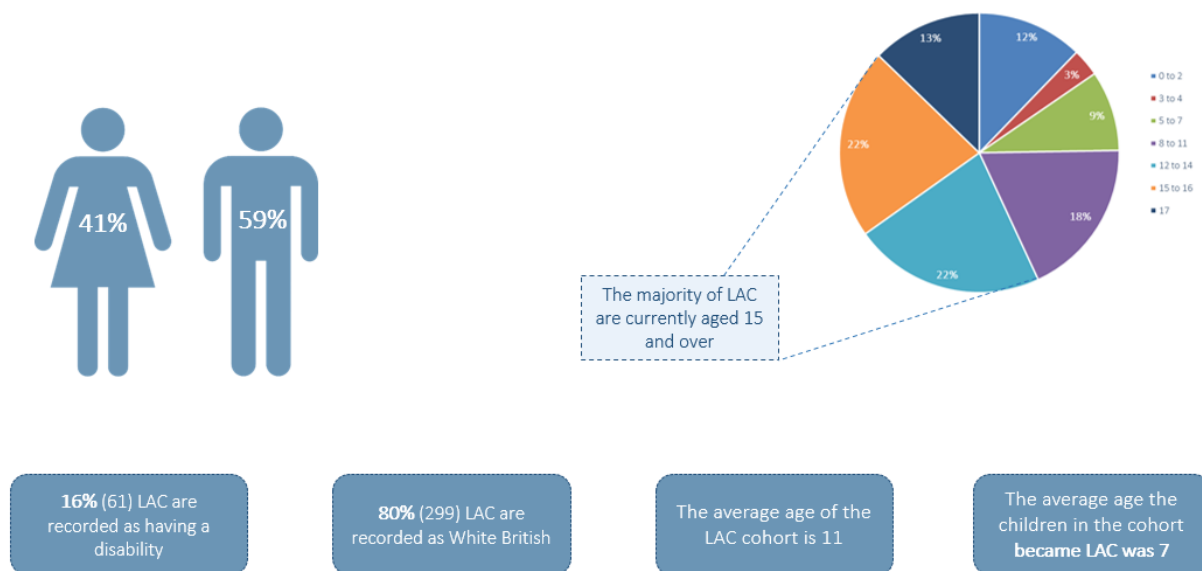
8 For consideration

8.1 Nationally, the number of children needing adoption has reduced and in line with this Portsmouth has also seen a reduction in the number of children with a court agreed adoption plan (Placement Order), over the past three years. Portsmouth Children's Social Care continues to maintain a robust

permanence tracking process to ensure children becoming looked after have a timely permanence plan appropriate to their needs. This may be placement with birth parents, special guardians, relatives, long-term fostering or adoption. In Portsmouth the introduction of the Family Safeguarding Model has seen more children diverted from the care system and either remaining in the care of parents or placed with family members.

8.2 Portsmouth have a growing number of children entering care at an older age. The average age for a child becoming looked after in 2020/21 was 7 years.

Looked After Children Profile



9 Areas of development

- 9.1 The government provided £650,000 investment to regional adoption agencies to boost adoptive family recruitment particularly for those children with complex needs and deemed harder to place i.e. older children, sibling groups and children of black, Asian and minority ethnic backgrounds. Adopt South continuously updates the recruitment strategy including developing prospective adoptive parents knowledge, understanding and support to promote matching with the children with complex needs.
- 9.2 There has been an increasing number of applications to revoke Placement Orders and then again at the Adoption Order stage. Bulk listing of adoption cases impacts on meeting government scorecards as there means that there is an adoption day every two months for all Adoption Orders and revocations. The court have indicated that if there is an urgent matter then they will list it but the tendency to all be bulk listed so this can cause delay if the next date is full when application is submitted. Overall, though, the bulk listings work well.
- 9.3 There have been an increasing number of applications to revoke Placement Orders and then again at the Adoption Order stage. Bulk listing of adoption cases impacts on meeting government scorecards as there means that there is an adoption day every two months for all Adoption Orders and revocations. The court have indicated that if there is an urgent matter then they will list it but the tendency to all be bulk listed so this can cause delay if the next date is full when application is submitted. Overall, though, the bulk listings work well.
- 9.4 Regionalising has been positive for the children and potential adopters in Portsmouth. In summary the strengths of Adopt South to Portsmouth are:
 - The removal of local competitive recruitment for prospective adoptive families.

- Building on local authority good practice, skills and expertise to enable prospective adopters to be fully prepared and suitably matched and supported with those children placed - securing that child's future throughout their childhood and beyond.
- Immediate access to a wider pool of adoptive families for Portsmouth children across the region. Adoptive placements more localised within the local regional area, promoting efficiency in adoption support, particularly specialist local service providers for adoption support. For example, the sibling pair that were placed for adoption in June last year after a two year wait were placed with Adopt South prospective adopters. These children have complex needs and a robust support plan was able to be established due to access to the range of support available within Adopt South.
- Early indications regarding Adopt South show an increase in the number of adoptive families available for those children needing adoption and that the timeliness for Portsmouth children leaving care for adoption continues to be on an improving trajectory.
- A centralised Adoption Support Fund and COVID-19 Scheme to help families, further reducing the risk of disruptions for children.

.....

Signed by (Director)

Appendices:

- Adoption activity 2020/21
- PCC Adoption Scorecard 20/21 , Government Adoption Scorecard -Portsmouth data

Appendix 1 Adoption activity 2013 – 2020

Page 391

Year 1 April - 31 March	Adoption orders No. of children adopted	Children's plans for adoption agreed	Placement Orders granted	Children linked with adoptive family	Prospective adoptive families approved	FfA placements	Placements disrupted
2013/14	27	41	30	35	37	0	0
2014/15	34	29	27	31	32	1	2
2015/16	25	41	41	28	22	4	2
2016/17	35	21	19	31	21	5	0
2017/18	30	31	30	20	11	5	1
2018/19	15	30	29	25	15	5	0
2019/20	25	27	20	21	34 (Portsmouth number)	2	2
2020 / 21	18	16	16	19		5	0

Appendix 2 - Adoption Scorecards

- 1) Pages 9 and 10 show data extracted from the DfE Adoption, Special Guardianship Leadership Board Adoption Scorecards published 24/08/20. For full information please see link:

www.gov.uk/government/publications/adoption-scorecards

- 2) Government thresholds for children needing adoption timeliness

A1: 426 days - from date child enters care to moving in with adoptive family

A2 : 121 days -from date the court agrees to local authority placing a child for adoption to the date the local authority agrees the match for the child with an adoptive family

Government Adoption and Special Guardianship Leadership Board (ASGLB), figures for rolling year 2016-19 (published August 2020)

A1: National England average 433 days

A2 : National England average 173 days

ASGLB Portsmouth timescales for 2016-19

A1 : Average 336 days

A2: Average 178 days

Portsmouth timescales for 2019/20

A1: Average 397 days

A2: Average 208 days

Portsmouth timescales for 2020/2021

A1 Average 387 days

A10 Average 339 days (this is BLA date to Placement date adjusted for FC adoptions)

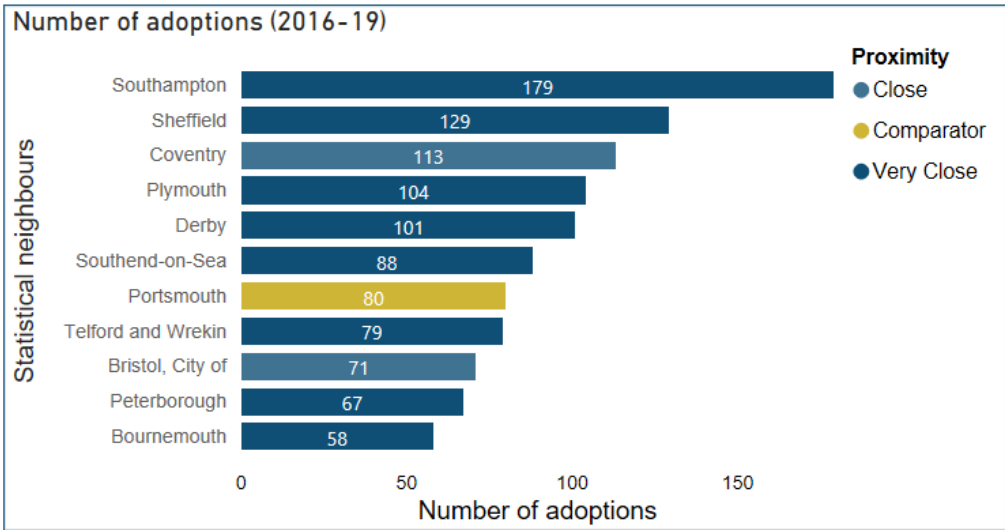
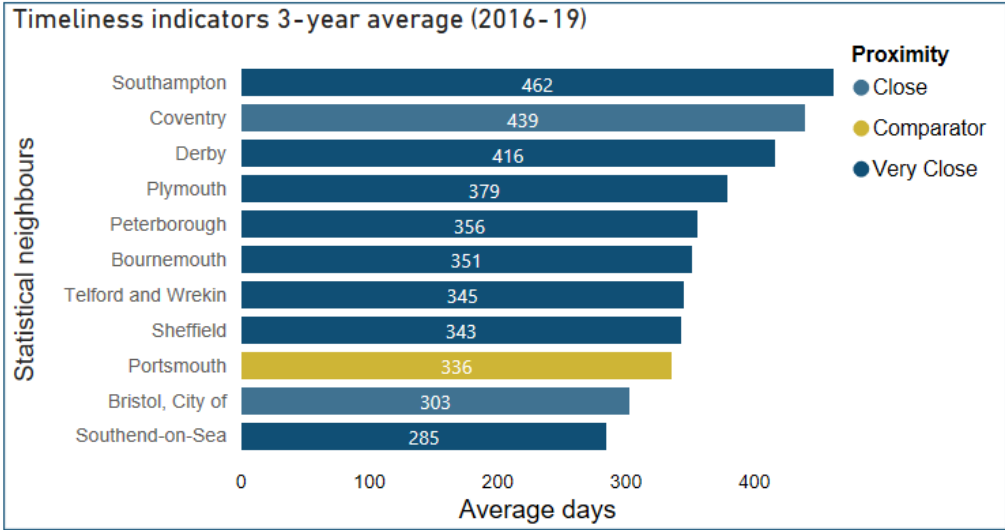
A2 Average 204 days

Select LA:
Portsmouth

Select indicator to display on the graph:

- A10
- A2
- A20

RAA this LA is in:
(Blank)



A10: Average time (in days) between a child entering care and moving in with its adoptive family adjusted for foster care adoptions:

2019:		2016-19:	
LA average days:	Stats neighbours average:	LA average days:	Stats neighbours average:
239	408	336	380

A2: Average time (in days) between a local authority receiving court authority to place a child and the local authority deciding on a match to an adoptive family:

2019:		2016-19:	
LA average days:	Stats neighbours average:	LA average days:	Stats neighbours average:
121	203	184	195

A20: Average time (in days) between entering care and placement order:

2019:		2016-19:	
LA average days:	Stats neighbours average:	LA average days:	Stats neighbours average:
143	252	178	241

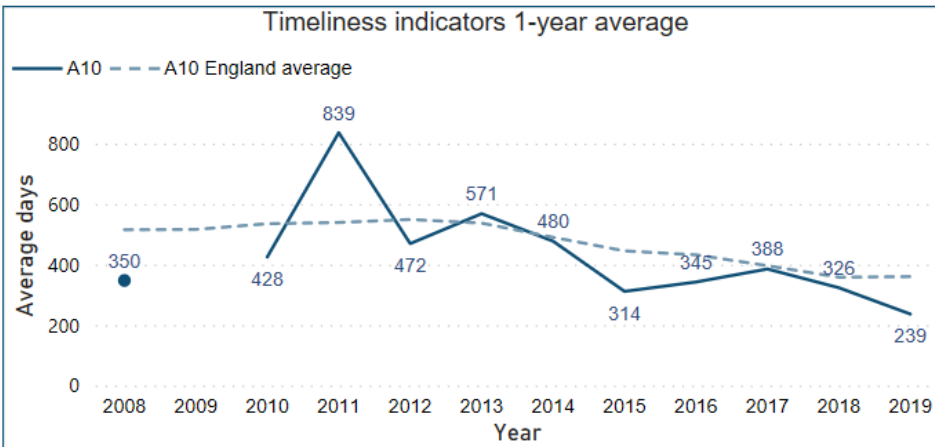
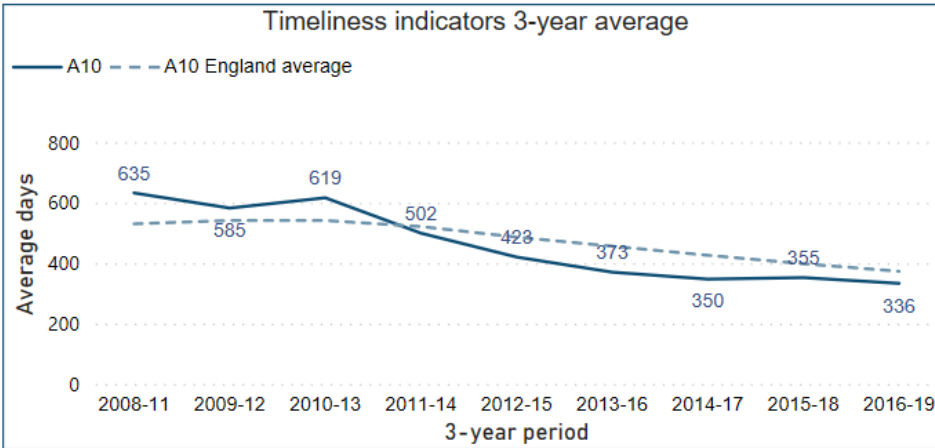
Note: If there is no data, or the data has been suppressed, the LA will appear as blank in the graphs.

Select LA:
 Portsmouth

- Select indicator(s) to display on graph:
- Select all
 - A10
 - A10 England average
 - A2
 - A2 England average
 - A20
 - A20 England average

- Select indicator(s) to display on graph:
- Select all
 - A10
 - A10 England average
 - A2
 - A2 England average
 - A20
 - A20 England average

RAA this LA is in:
 (Blank)



Related information - 2019		
A15: Number of ADM decisions:	A16: Number of new placement orders granted:	A17: Number of children in a FFA/Concurrent Planning foster placement:

Additional information - 2016-19			
A5: Number of children for whom permanence decisions have changed away from adoption:	Number of adoptions:	Number of adoptions: BME:	Number of adoptions: Aged 5 or over:
	Number of children starting to be looked after: Under the age of 5		

A10: Average time (in days) between a child entering care and moving in with its adoptive family adjusted for foster care adoptions:				
2019 average days:	2019 England average:	Average time in 2019 was shorter than in 2018	2016-19 average days:	2016-19 England average:
239	363		336	376

A2: Average time (in days) between a local authority receiving court authority to place a child and the local authority deciding on a match to an adoptive family:				
2019 average days:	2019 England average:	Average time in 2019 was shorter than in 2018	2016-19 average days:	2016-19 England average:
121	170		184	178

A20: Average time (in days) between entering care and placement order:				
2019 average days:	2019 England average:	Average time in 2019 was shorter than in 2018	2016-19 average days:	2016-19 England average:
143	256		178	257

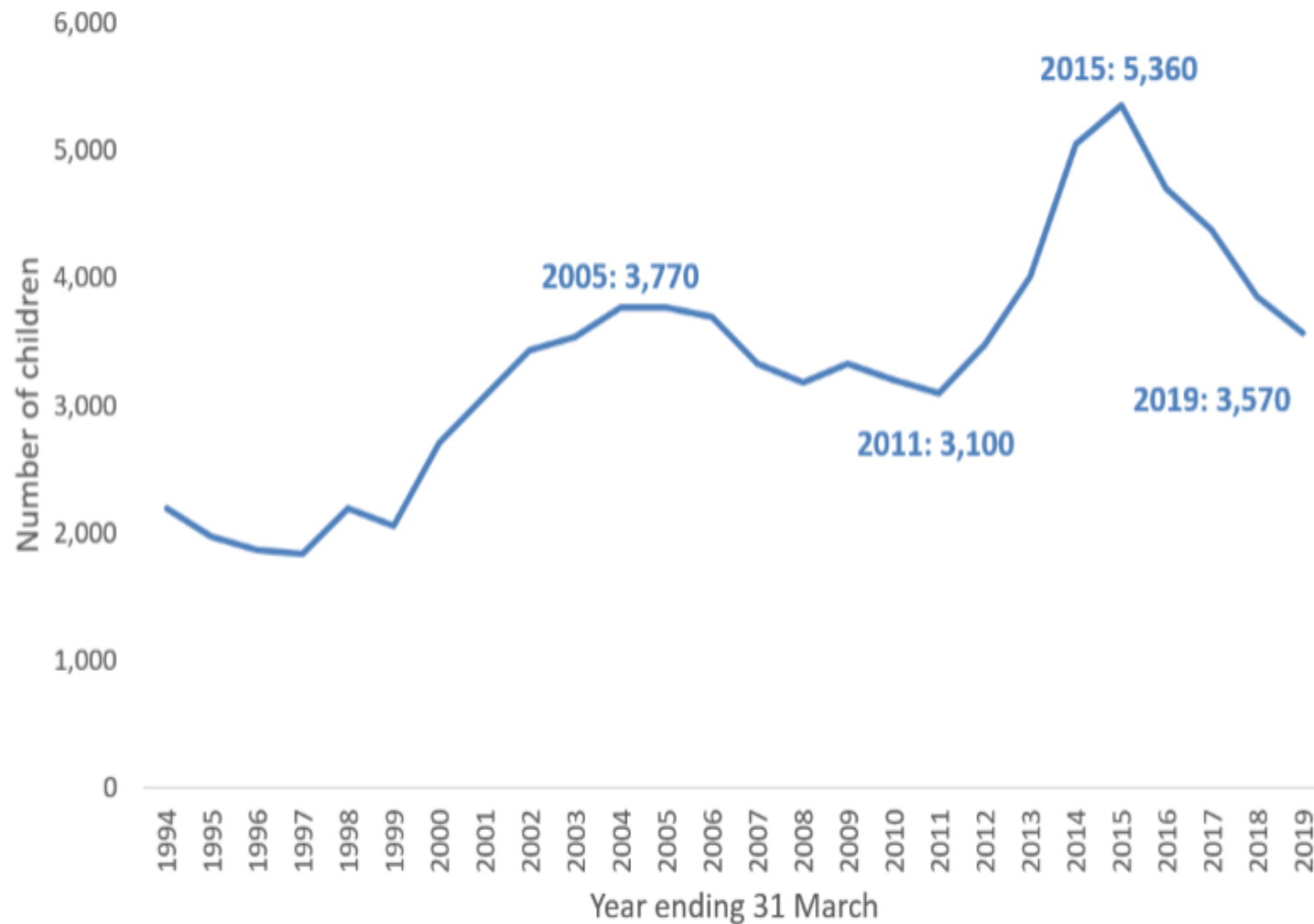
Matching and Recruitment (at 31 March 2019)	
A14: Number of children waiting to be placed with a placement order:	21
A11: Number of approved adoptive families waiting to be matched:	x
A13: Number of applications of adoptive families still being assessed:	20

Please see ASGLB local level files for further adopter measures. Where a LA is part of a RAA they will show as N/A for the A11 and A13 indicators.

Data from DfE ASGLB published 24/08/20

Adoptions from care continue to fall...

Looked after children who were adopted during the year



Children ceasing to be looked after during the year due to adoption fell by 7% to 3,570 - this continues the drop seen last year and is down from a peak of 5,360 in 2015.

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Agenda Item 12



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(Please note that "Information Only" reports do not require Integrated Impact Assessments, Legal or Finance Comments as no decision is being taken)

Title of meeting: Cabinet

Subject: Children's Social Care

Date of meeting: 27 July 2021

Report by: Alison Jeffery

Wards affected: All

1. Requested by: Cllr Horton

2. Purpose

This paper provides information about the interim report of the national independent review of children's social care, published in June. It notes the broad stance on that report which it is proposed should be taken in a detailed response from the Lead Member for Children, Families and Education. It then updates Cabinet on progress and next steps with our own local strategy for even better, more affordable social care and early help for children, young people and families.

3. Information Requested

Independent Review of Children's Social Care

1. The Government announced in January 2021 the establishment of an independent review of children's social care, in pursuance of a commitment in its 2019 Manifesto. The review has a wide ranging remit; information about the background to the review and the evidence it has taken can be seen on the review website at <https://childrensocialcare.independent-review.uk/>. The Chief Principal Social Worker for England, Isabelle Trowler, has promoted the review as a "once in a generation" opportunity to improve support for vulnerable children and families.
2. The review is led by Josh McAlister, a former teacher who established the social work charity Front Line to promote entry to social work by high attaining graduates. An interim report titled "The Case for Change" was published by the review on 17

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June and can be accessed at the link above. A summary of the report prepared by the Association of Directors of Children's Services is attached as Annex A.

3. An important part of the background to the review in recent years has been the rapidly rising cost of children's social care to local councils, driven by a significant increase in the number of children becoming looked after. "The Case for Change" notes the significant increase in "statutory" spend on children in the child protection system as opposed to "non-statutory" spend, providing "early help" to families. Overall total spend has increased from £10.1b in 2012/2013 to £10.5b in 2019/2020; within that total statutory spend has increased from £6.6b to £8.2b whereas non statutory spend has declined from £3.5b to £2.3b. The review calls for the balance to be redressed through significant additional investment in non-statutory spend and real help for families. For several years now a case has been made by local Government that there is a £2b funding gap in children's services. The independent review interim reports states that:

"There is no situation in the current system where we will not need to spend more - the choice is whether this investment is spent on reform which achieves long term stability and better outcomes or propping up an increasingly expensive and inadequate system."

4. The key criticisms of the current system made in the interim report are firstly that families are not given sufficient, meaningful support to avoid children needing to be taken into care, and secondly that the children who do become looked after are not helped to develop the network of loving relationships which will sustain them into adulthood and beyond but instead become dependent on an often changing group of professionals. The report also argues that the market for residential care for children is broken with market cartels requiring councils to pay very high prices for care of variable quality. In Portsmouth we have worked on all three of these crucial issues and made progress as explained in more detail in paragraphs 8ff below.
5. There is room for debate around some of the more colourful statements in the report about current arrangements and on the significance of stronger social work alone in tackling the impact of poverty for families. Most importantly, there is a crucial question on which views are sought. This is the question of whether there is an inherent tension in a single service - children's social care - trying both to help families and to protect children.
6. While not stating this explicitly the interim report appears to try to establish a platform for possible structural change in which the two objectives are perhaps pursued by separately organised services. We believe that this would be a profound mistake. In Portsmouth we have been committed for several years to "restorative practice" through which we work **with** families providing **both** support **and**

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challenge through strong relationships. A service which only provided support could easily slip into working "for" families, without building their own capacity for behaviour change. Equally a service which focussed only on child protection investigations and decisions would quickly become one which did "to" families, mistrusted and punitive. Social workers do not work completely alone and through our Family Safeguarding model their work is complemented by expert guidance, and some direct work, by adult service specialists in mental health, domestic abuse and substance misuse. Our model blends meaningful support with clear challenge as part of a trusting relationship and has had significant impact over the last 18 months, even during a pandemic, in keeping families together. It would be immensely damaging if nationally driven structural change led to an unpicking of the integrated, coordinated support for families which our workforce has worked hard to develop. We propose that the council's response focuses on explaining this point and argues for an approach which builds instead on the significant advances which have already been made nationally and locally, including in Portsmouth, through investment in and championing of the Family Safeguarding model together with a commitment to embedding restorative practice.

7. The remainder of this report provides an update on the progress made so far, and future plans, for strengthening children's social care and early help in Portsmouth in a way which ensures financial sustainability as well as better outcomes for children.

Progress and impact of the local strategy to date

8. In early Autumn 2018 Ofsted inspected children's social care and early help in Portsmouth and rated it "Good" across the board. This successful outcome reflected both hard work to develop and maintain high standards of social care practice and significant strategic development in particular the creation of a strong targeted early help offer to families through a service which integrated Solent NHS Trust community public health services (health visiting and school nursing) with city council targeted family support. Another element in our success was the embedding of restorative practice across the service, ensuring families are given both high support and high challenge through trusting relationships with a lead practitioner supported by a "team around the worker" of specialist experts.
9. Following that inspection there was a period of further strategic development with extensive participation by staff and foster carers, exploring how best to strengthen prevention at all levels of need, in order both to improve outcomes for children and to secure a financially sustainable service. An independent consultancy, Peopletoo, was then hired early in 2019 to review the strategy developed by the Directorate and partners. Peopletoo found that the service was already "lean" compared to

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services in other areas and also confirmed that the strategy, a further development of the 2016 Stronger Futures strategy, was appropriate while ambitious.

10. The approach to achieving financial sustainability centred on the care budget, reducing the number of children in care, the number of days in care and the costs of care. The aim was to do this not by taking risks over the threshold of intervention but instead by being even more effective at keeping families together wherever possible and promoting stable secure relationships for all children, including those who need foster care or adoption, avoiding the need for expensive residential care placements. Essentially the strategy was to try to provide all children with the love, security and stability which the independent care review rightly argues must be the key objective of all children's social care and early help services.

11. Key elements of the improvement and financial sustainability strategy included:

- a) Sustaining investment in our integrated council and Solent NHS Early Help service and continuing to develop a locality model of integration introduced in 2016
- b) Maximising income from the national Troubled Families Programme to maintain investment in early help and to help fund service innovation and transformation
- c) Introducing the Family Safeguarding Model of Practice to reduce care proceedings and improve reunification of children in care back to their families where safe to do so
- d) Implementing the Mockingbird Family model of foster care
- e) Continuing to support deeper implementation of restorative approaches both within the service and the wider system, notably schools and academies through the city wide Portsmouth Education Partnership established in 2016.
- f) Continuing to lobby for improvements in the National Transfer Scheme for Unaccompanied Minors

12. To address an increase in the numbers of looked after children from 2017, partly reflecting an improved line of sight through stronger identification of need, the council also agreed a significant baseline addition to the children's services budget from the national Social Care Grant.

13. Despite the pressures on families of the pandemic, progress has continued across all areas of the Strategy. Key headlines include:

- Investment has been sustained in the **Integrated Prevention and Early Help Service** including through Troubled Families funding. A required saving of £100,000 from the Public Health grant because of reductions in that grant has been achieved without reducing front line capacity.

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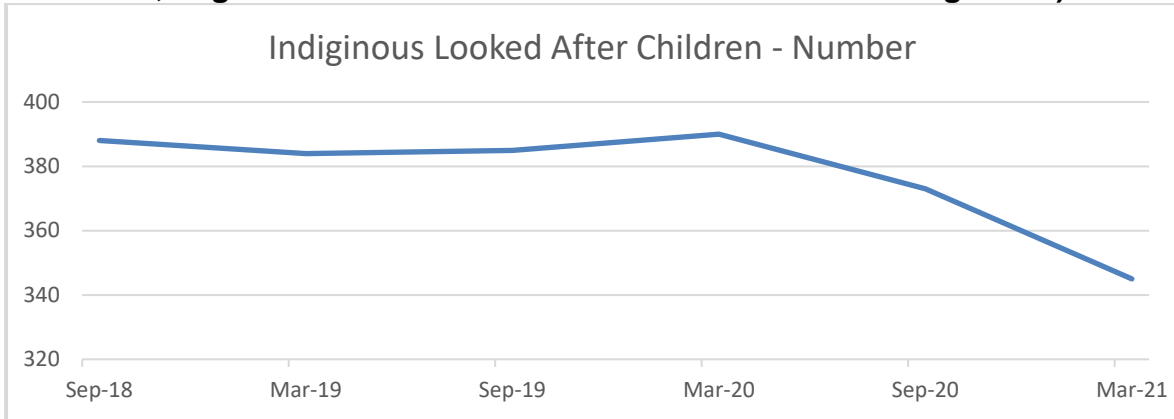
- Phase 2 of the **Troubled Families** programme started slowly in Portsmouth for the first two years, but the final 3 years saw us catch up and secure the vast majority of the funding available for Payments by Results funding. Two 'roll-over' years for the national programme (pending the Comprehensive Spending Reviews) have seen us achieve 100% claims in year one and on target for 100% in year 2
- The **Family Safeguarding Model** (integrating children's social workers with adults specialists in domestic abuse, mental health and substance misuse funded through a permanent £0.5m uplift in the CFE budget) is progressing well in Portsmouth. This has been despite our doing this with a quarter of the investment used in other LA areas that received dedicated national funding. Quarterly reports received by the Family Practice Board indicate highly effective whole-family work with children on the edge of care and significant cost-avoidance. A recent Peer review by the national lead LA for Family Safeguarding (Hertfordshire) was extremely positive.
- Implementation of the **Mockingbird Model** of care was slightly delayed during the pandemic for infection control reasons but has now begun with our first 'constellation' of foster carers. Feedback from looked after children, foster carers and also birth families has been extremely positive with the model seen as providing a much more natural community of support for children, helping them to build and maintain relationships both with new friends and with their birth families and networks.
- Continued engagement with the Home Office on the **National Transfer Scheme** for unaccompanied asylum seekers (UAMS) including a difficult but necessary period of standing back from full delivery of statutory requirements, has borne fruit with the number of UAMS in Portsmouth now at safe levels.

14. Key Indicators of success include the following:

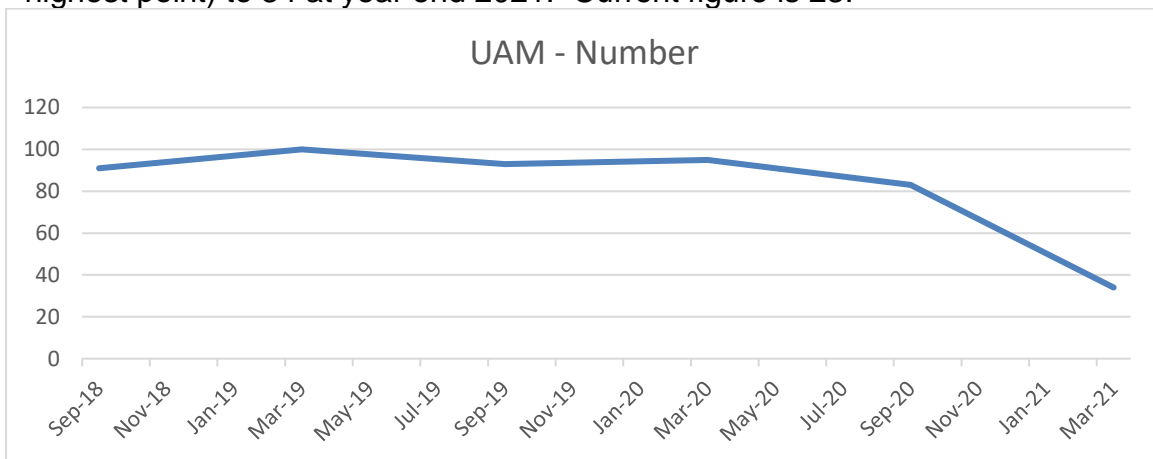
The number of children in care from Portsmouth has reduced over the past two years to 345 in March 2021. The Financial Sustainability Strategy modelling had an aspiration to achieve 323 children in care (excluding UAMS) by March 2023. So we are well on track.

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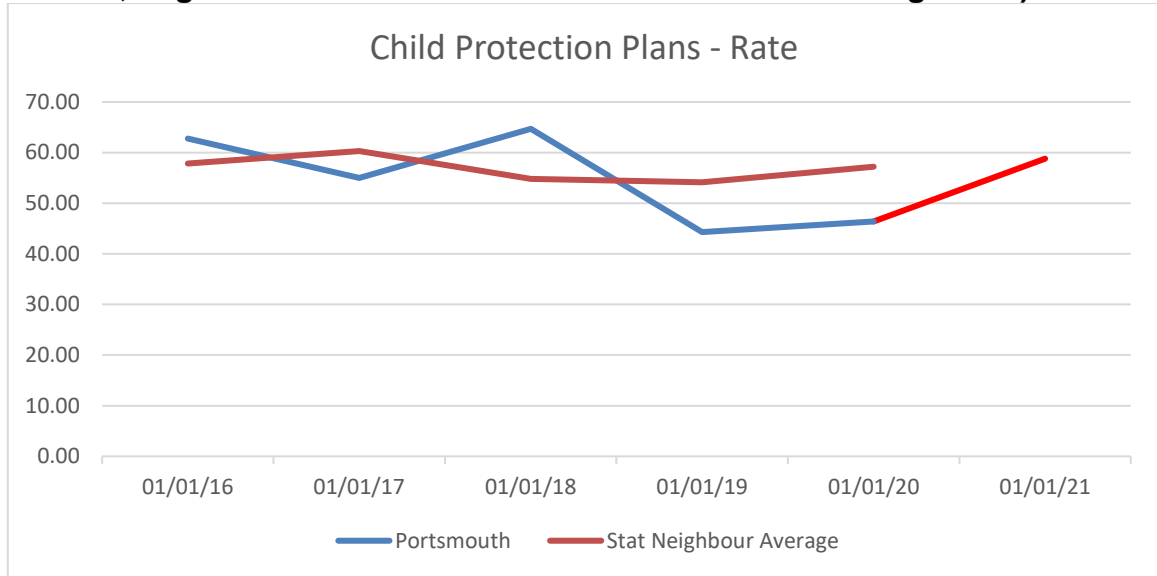
The number of UAM children has reduced from a high of 100 (in fact 108 at its highest point) to 34 at year end 2021. Current figure is 23.



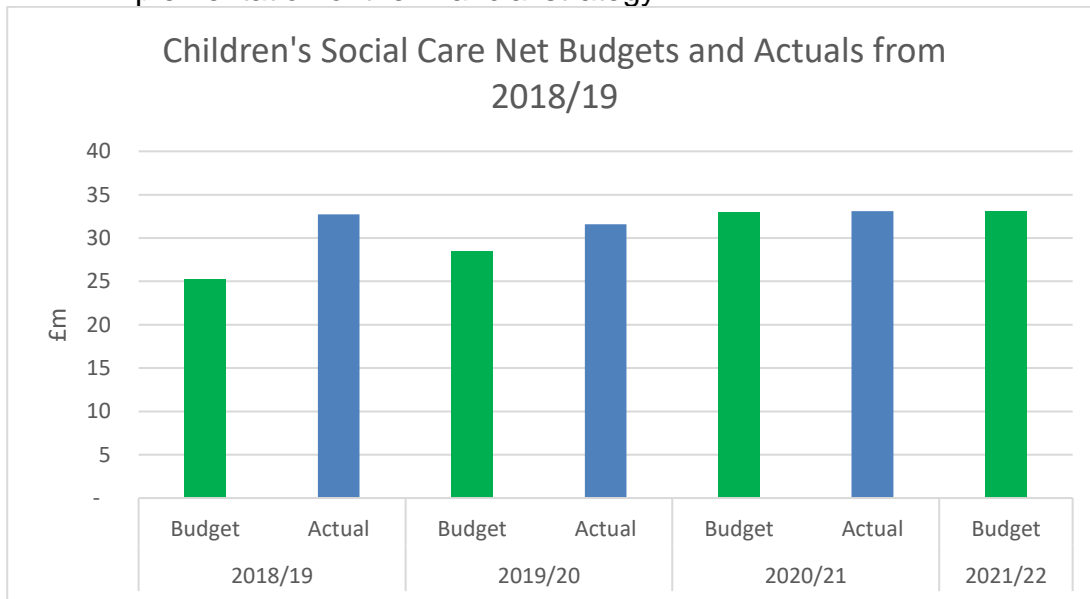
Pre-Covid, we were seeing the impact of sustained investment and improved working of early help services on our rate of Child Protection Plans, coming below statistical neighbour average for the first two years of our strategy. However, the impact of the lockdowns on child protection can be seen in the red section where the numbers of child protection pans climbs (to 259 plans). This order of increase has been replicated nationally.

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The chart below shows the stability of the net expenditure as a result of the implementation of the financial strategy.



Further planned improvement

- There is a greater degree of uncertainty about demand for children's early help, safeguarding and care services as a result of the pandemic. The impact of lockdowns on child harm, mental health and the emotional and financial resilience of families will continue to work its way through over the coming months and years. The 2020-21 rise

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in child protection plans, and of children at Child in Need level, may be with us for some time.

16. However, the fundamentals of our approach to deliver both financial sustainability and high quality support for children and families remain clear. Developmental and improvement work will continue on:

- The quality of practice in the **Integrated Early Help Service** including responding to the new Healthy Child Programme, improving joint work with maternity services, the digital offer and parenting support
- Maximising income from the Troubled Families (now known as the **Supporting Families Programme** - subject to national investment. This programme brings around £1million a year into the city, providing funding for a core part of the city's Early Help offer.
- Implementing the findings of the Peer Review into **Family Safeguarding Model** including close joint work with Probation on domestic abuse and adult offender management
- Developing additional constellations of carers under the **Mockingbird Family** model of care
- Continuing to **drive restorative and trauma informed practice** through a new learning and development hub, bringing together workforce development leads across the council, NHS and Police under the auspices of the Safeguarding Partnership.

17. Our next areas of focus (some delayed by, but some informed by, the pandemic) include:

- a) The **'Deal with Parents'** being constructed under the auspices of the Children's Trust Plan by the Portsmouth Parent Board. This will seek to provide clear messaging to parents and from parents about their critical responsibilities for children's wellbeing, as well as a promise from public services to help where needed.
- b) Developing clearer expectation and support for **system-wide early help**. Building on learning from the pandemic and the Family Safeguarding Peer Review, we will be simplifying processes and enhancing professional support for colleagues in health services, early year's settings and schools to meet family needs at an earlier

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point. This will be enhanced by the use of real-time child level data to identify early concerns and enable appropriate and proportionate responses to need.

- c) Related to this, we are developing a **revised strategy with schools** to reduce school exclusions, school absence and reduced timetables to enhance education as a protective factor for vulnerable children. This will include a continued drive to embed restorative approaches within schools designed to build positive communities in which all children feel a strong sense of belonging.
- d) Joint commissioning of a **new specialist residential offer** for our most vulnerable children in care in partnership with Kent, West Sussex [and Southampton]. Other local authorities are being engaged to join the project to increase commissioning leverage over the market. A market Notification has been put out to providers and the market seems strong enough to develop something unique in the South of England that meets the needs of our 10 most vulnerable children whose current placement costs are extremely high.
- e) A renewed and re-energised focus on **reunification** of children in care back with their families where safe to do so.
- f) We know that recruitment and retention of high quality social workers continues to be a national issue for children's social care. To support our workforce locally we have appointed a **Principal Social Worker**. This role is critical in driving innovation, and leading the delivery and development of excellent social work practice as set out in our recently launched Workforce Strategy.
- g) Developing a more integrated **multi-agency Looked After Children service** across the council and Solent NHS to improve outcomes for Looked After Children including improvements in placement stability, education outcomes and health outcomes. Helping looked after children to develop and maintain a network of loving relationships, as advocated compellingly by the independent care review, will be at the heart of this work.

Risks

18. The strategy outlined above has been developed through careful analysis and planning. Nonetheless, we need to be aware of some key risks that will need managing and mitigation activity over the coming months and years. Risks include:

- a) Demand for child protection plans has increased during Covid due to the harm children have experience during lockdown. There is a risk that this rise will translate into upward pressure in LAC numbers over the coming months

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- b) Recruitment of social workers is highly competitive at the moment; while we work hard to recruit and retain good staff there is always a risk in this area, which then impacts on our ability to provide strong support to families.
- c) System-wide early help requires changed practice within schools. We see mixed practice across our schools and getting every school and early years provider to the same standard - with differing investment in pastoral support - will be a challenge.
- d) Co-commissioning with partner local authorities has a mixed history across England and the successful of jointly commissioning residential care between a number of local authorities will require careful partnership management
- e) The comprehensive spending review and the impact on funding for Children's Social Care and the Council.

Conclusion

19. The interim report of the independent review of children's social care in England rightly asks challenging questions of councils in relation to their leadership of services which have a powerful impact on the lives of vulnerable families. Like many councils, we believe in Portsmouth we are making good progress already in transforming services and improving the lives of children and families. Both nationally and locally we need to continue to invest in early intervention and in effective support and challenge for families, particularly through the successful Family Safeguarding approach which draws on the expertise and time of key adult service practitioners working alongside children's social workers. We also need to develop new forms of alternative care which focus on the development of the long term relationships which are so crucial for all children and young people.
20. We believe we do not need nationally driven structural change which could undermine this direction of travel; rather we need support from the Government to build on the innovations of recent years and continue to spend money in the right way, on good services whose impact on families is positive.

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APPENDIX

Association of Directors of Children's Services

Briefing on the independent review of children's social care – the case for change Highlights and key messages from the report

The Review finds that children and families are: "...not yet getting a good enough deal," but notes that this is not a criticism of the many dedicated professionals working to improve the lives of children and families. "In the majority of cases, families become involved with children's social care because they are parenting in conditions of adversity, rather than because they have, or are likely to, cause significant harm to their child."

The Review finds that **decision making and risk assessment** related to harms is too inconsistent and often isn't good enough in relation to child protection. Too much energy is spent on assessing and investigating families instead of providing support, which is described as costly and intrusive. There is a high level of anxiety when making decisions, both social workers and organisations continue to feel very vulnerable to public, regulatory and government scrutiny if things do go wrong.

The report notes several times that **social workers** spend less than a third of their time working directly with children and families. Too often they don't have the freedom to follow their judgement of what is in the best interests of children and families. The Review finds that too many LAs have disempowering, complicated processes to make decisions and allocate resources.

Evidence shows contributory causal relationship between income, maltreatment and state intervention: "We have now reached the point where the weight of evidence showing a relationship between poverty, child abuse, neglect and state intervention in family life is strong enough to warrant widespread acceptance... this should lead us away from framing these differences as 'variations' in social care interventions and be framed as **welfare inequalities**." A parallel is drawn with the now widely accepted view of education inequalities.

On **policy and practice responses**, the Review finds: "... teens who experience criminal exploitation have been particularly failed," noting different parts of the children's social care, justice and health systems are responding differently to the same children and young people, resulting in gaps, confusion and worse outcomes. Similarly, there has been a long term failure to support parents who have had child/ren removed, this has led to: "... unacceptable entrenched and multi-generational cycles of adversity." With such complex needs, it is unrealistic to expect general family help would ever be enough to stop these parents continuing on the same path.

Investing in family help matters, but more money alone is not a silver bullet. The report points to emerging evidence on the impact of early investment in help and support reducing the need for more acute interventions. "The government's focus should be on supporting the resources of families and the wider community... whilst acting decisively and swiftly where children need protection." An agreed definition of early help / family support is needed and a first draft is put forward for feedback.

Care must build rather than break relationships and more must be done to keep children safely out of care, although it is recognised that the state will always need to step in and provide care for some. There have been attempts to improve parts of the system but so far they have failed to prioritise loving relationships. So, shared and supported care options

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may have a role. "When children enter care, they are separated from the most significant adults in their lives, even if this is for good reason." More emphasis is needed on building and maintaining relationships as well as life story work. Too often entry into care means a move away from school and friends; every change has a profound impact on child/ren.

On **placements**, greater focus and attention should be paid to identifying kinship carers before entering into proceedings. The report notes that previous reviews of residential (2016, DfE) and foster care (DfE, 2018) have not led to significant changes. Many concerns about independent and semi-independent placements were raised with the Review, particularly in relation to under 16s and UASCs, however, some young people told the Review this was the right option for them.

The Review finds that the **market for care** and LA commissioning is "broken" and there is significant fragility in the system. The Review is concerned about cost, profit and financial health of providers and the impact of the current system on children and young people. A CMA market review is underway.

Care for children who need a **secure placement** reflects short term, siloed thinking across government and urgent action is needed. Better planning, co-ordination and investment, with leadership across health, justice and social care, is needed. We also need to consider the needs of these children and ask whether any home that currently exists is able to meet their needs while still providing a loving environment.

The Taylor Review (MoJ, 2016) recommended secure schools to replace **youth custodial provision**, which has poor outcomes. The MoJ agrees, yet none have opened and there is no plan to close YOIs: "The alarm has been rung many times and action is long overdue."

On **support**, parents, carers and care experienced adults told the Review that therapeutic support should routinely be provided to children in care rather than be argued and pleaded for (intensive **CAMHS** support may not be required in all situations). **Education** can be transformative, VSH and PP+ funding is having an impact but "we are not consistently aspirational enough for children in care." Huge variation in **care leaver support**, including local offers and access to staying put / staying close was evidenced.

Sadly, a resounding theme in feedback and submissions to the Review concerned the **stigma** care experienced children, young people and adults face.

"There is no situation in the current system where we will not need to spend more...

Children's social care is under significant **financial pressures** and urgent action is needed." The Review notes that the latest MHCLG figures show spend on children's social care is rising faster than any other area of LA spend. This increase is being driven in the most acute end of the system, a cycle that must be broken.

The complexity of the **policy landscape** around children's social care has led to uncoordinated policy initiatives from a range of government. Children's social care needs a clear vision and purpose. The Review is interested in the role communities could play here.

Multiagency arrangements and the partners involved have different footprints, priorities and procedures and health are often not closely involved in safeguarding conversations. Partners know their own roles but lack a shared understanding of their collective goal, echoing the findings of the recent Wood Review (DfE, 2021).

Too often **reform initiatives** over the past decade have had limited impact or are too small scale to transform practice across the country. Similarly, there is a systematic

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overconfidence that additional top down duties or changes to legislation will lead to positive change for children and families.

The review heard "time and time again" about the role **inspection** plays in driving behaviour. Are we measuring the things that matter to children and families, does inspection take account 3 of their experiences? We need to be able to measure change and understand whether things are genuinely improving for children and families.

Other areas of interest include disparity in court decision making, SEND support, the need for better facilitation of information sharing for safeguarding purposes, the collection and use of data and metrics for success: "We are over reliant on Ofsted gradings."

In closing, the Review notes that a significant number of the problems diagnosed in the document have been exposed and described again and again with sensible, considered recommendations for change. Yet actually achieving change has been stubbornly difficult.

Actions the Review will undertake, have commissioned and/or future areas of focus:

- Deeper look at ethnicity and intergenerational experience of care going forward
- The tension between protection and support work
- Testing out a definition of family help in the next stage of the Review
- A new approach to work with teens who face risks outside of the home
- Recognition and support for kinship carers is to be looked at in the next stage of work
- The Review has asked WWC CSC and Oxford Uni to look into placement commissioning
- Continue to work closely with the CMA on their market review of care placements
- Engage with the SEND Review on shared areas of interest, particularly support for children and families e.g. respite care
- The Review recognises the stigma children in care and care experienced adults face and wants to hear ideas about how to address this in the next phase of work
- What it will cost to achieve a shift from acute to earlier spending and the benefits of this will be the focus of the next stage of the review
- Central government's willingness to work together to develop policy in a coordinated way.

Specific questions posed by the Review for feedback on or before 13 August

- What do you think the purpose of children's social care should be?
- What is the role of the Children's Social Care system in strengthening communities rather than just providing services?
- How do we address the tension between protection and support in Children's Social Care that families describe? Is a system which undertakes both support for families and child protection impeded in its ability to do both well?
- What do you think about our proposed definition of family help?
- How do we raise the quality of decision making in child protection?

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- How do we fill the accountability gap in order to take effective action to keep teenagers safe?
- What can we do to support and grow kinship care?
- Given the clear evidence, why aren't more programme that support parents at the edge of care and post removal more widely available and what will it take to make this the case?
- If we were creating care today, what would it look like?
- How can care help to build loving lifelong relationships as the norm?
- What changes do we need to make to ensure we have the right homes in the right places with the right support? What role should residential and secure homes have in the future?
- How can we strengthen multi-agency join up both locally and nationally, without losing accountability?
- How do we free up social workers to spend more time in direct practice with children and families and reduce risk aversion?
- How can monitoring and inspection make the most difference to children's and families' experiences and engender greater freedom and responsibility in the workforce?

What will need to be different about this review's recommendations compared to previous reviews so that they create a tipping point for improvement.

.....
Signed by (Director)

Appendices:

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

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

Title of document	Location

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Agenda Item 13



Title of meeting:	Cabinet
Date of meeting:	27 th July 2021
Subject:	A heritage strategy for Portsmouth
Report by:	Stephen Baily, Director of Culture, Leisure and Regulatory Services
Wards affected:	n/a
Key decision:	No
Full Council decision:	No

1. Purpose of report

- 1.1 The report seeks approval to start a wider consultation on a heritage strategy for Portsmouth.

2. Recommendations

- 2.1 It is recommended that:
 - i. **Approval is given for the draft heritage strategy to go out to consultation**

3. Background

- 3.1 Portsmouth is a unique in being largely an island city, with a rich and diverse historic built environment. It has been shaped for most of its history by the strategic advantages of its excellent deep water harbour and its association with the Royal Navy which stretches back almost a thousand years. Our heritage has shaped what and how we are as a city, and will continue to influence where we are going.
- 3.2 Understanding and interpreting the heritage story for the city is hugely important, to foster the sense of civic identity, but also because of the importance of our heritage in creating the future for Portsmouth. Heritage themes and assets are crucial to our economic success in years to come. Understanding the past gives us a sense of the present and confidence for the future.
- 3.3 Over the last year, there has been a wide-ranging, community-led exercise in Portsmouth to describe a vision for the city's future – including reflecting the



issues that matter to people in the light of the pandemic. Thousands of contributions were received and considered by a steering group of public, private and third sector agencies in the city to enable a vision for Portsmouth in 2040 to be articulated. This vision reflected not just the things people wanted to see, but also the way they want the city to feel. Values described by residents included a community focus, collaboration, equality, respect and innovation.

- 3.4 One of the themes that came through very strongly was the importance of heritage and a statement emerged in the vision that in 2040:

"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."

- 3.5 For some time, we have not had a Heritage Strategy in the city to guide how we will conserve and interpret the heritage of Portsmouth, and ensure that heritage is key to the economic and health outcomes to the city. A draft document has therefore been developed (attached as Appendix 1) which sets out a vision for heritage in Portsmouth, and identifies some key themes for future working in the city around this, also highlighting some projects that can be taken forward to support this. The draft has been consulted with Historic England as a key stakeholder for heritage in the city.

4. A heritage strategy for Portsmouth

- 4.1 Our vision is to create a city where our heritage is understood, celebrated and integral to the city's life and success.
- 4.2 If this vision is to be achieved, then the draft strategy identifies some things that we will very particularly need to do:
- reinforce and develop Portsmouth's distinct historic identity
 - invest in the fabric of historic assets and realise viable uses
 - ensure that heritage is an integral part of the economic success for the city in the future
 - Engage and actively involve people - residents and visitors - in our heritage environment, assets and stories.
- 4.3 The city council will play a leading role in this as the owner of many of the city's heritage assets, but other partners will be critical to the success of this strategy. The city is fortunate in the number of organisations and individuals with heritage expertise and interest. We now want to consult with these groups to ensure that the strategic working for the city around heritage fully reflects the knowledge, skills and experience in the city, and matches this against key priorities.



4.4 The draft document also identifies a number of projects where assets need to be supported. These have broadly been grouped as:

- Historic Fortifications
- Historic Naval Base
- Portsea
- Wider Cultural & Industrial Heritage
- Public realm

4.5 As part of the consultation, we will seek any further input on describing the issues relating to these areas, and views on appropriate solutions. We will also seek views particularly on engaging with the wider community on the heritage agenda, where many organisations in the city have a strong track record of developing projects that create interest and excitement.

5. Consultation

5.1 The Heritage Strategy is not a statutory document, so there is no set framework for consultation. However, we want to ensure that there is the opportunity for broad feedback and engagement. Therefore, it is recommended that the document is consulted for a period of 2 months, throughout August and September, with a final strategy to be presented to Cabinet, taking account of all the feedback in October.

6. Reasons for recommendations

6.1 It is important that for a city of Portsmouth's heritage interest, there is a strategy that sets out how we will approach this heritage, and how the work might be prioritised. It is also useful to have a document that sets out these intentions for bodies who we may approach for support for schemes in the city, including funding support.

6.2 There are many sources of expertise in the city, and so it is recommended that a broad consultation now takes place to ensure that the strategic development in the city can benefit from the collective skills, knowledge, experience and perspectives.

7. Integrated impact assessment

7.1 The document is a draft for consultation so does not require a full integrated assessment at this time. The consultation period will enable us to gather further information to enable a full assessment to take place.

8. Legal implications

- 8.1 There are no legal implications arising directly from the recommendation in this report
- 8.2 As mentioned in the body of the report, the Heritage Strategy is non-statutory. Consequently, there is no specifically prescribed procedure or steps which must be followed for its development or approval.

9. Director of Finance's comments

- 9.1 The actions proposed in this report will be funded from the existing service portfolio budgets, as approved by Full Council. Any potential additional expenditure arising from the final strategy will be addressed in a future report.

.....
Signed by: Stephen Baily, Director of Culture, Leisure and Regulatory Services

Appendices: Appendix 1 - draft Heritage Strategy for Portsmouth

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

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

Title of document	Location

The recommendation(s) set out above were approved/ approved as amended/ deferred/ rejected by on

.....
Signed by:

Stephen Baily, Director of Culture, Leisure and Regulatory Services & Tristan Samuels, Director of Regeneration

Heritage Strategy for Portsmouth

Considering heritage as an integral part of our city's future success

Foreword



I am pleased to introduce this Heritage Strategy for Portsmouth. Our great waterfront city has over 1,000 designated and undesignated heritage assets and we are rightly proud of the contribution they make to the city for both residents and visitors alike. In recent years a number of significant heritage projects have taken place in and around the city: at Spitbank Fort in the Solent, 18 gun battery; the First World War monitor HMS M33; at Boathouse 4 and the former cell blocks within the historic dockyard; and in the development of the Hotwalls Studios in Old Portsmouth.

The city has a duty to its heritage, one the council and our partners take seriously. Despite significant past achievements there is still much that we can and must do for the heritage of our city, and this strategy seeks to set out our vision for the city's heritage and how we will deliver on that.

We, and other partners in the city, are stewards of the city's cultural heritage and historic built environment, preserving and developing these for future generations. We will integrate the historic and contemporary in a way that creates a distinctive and exciting urban landscape and lifestyle.

As we emerge from the challenges of the global pandemic, I am excited about the possibilities for the future of Portsmouth, and believe that our heritage can play a dynamic part in building that future. I invite you to join me in this hopeful vision, and in celebrating and championing Portsmouth's distinctive heritage so that generations to come can grow to understand and love our city in the way that we do now.

Cllr Ben Dowling

Cabinet Member for Culture, Leisure and Economic Development
Portsmouth City Council

Cllr Lee Hunt

Heritage Champion
Portsmouth City Council

Introduction

This strategy sets out how we will conserve and interpret the heritage of Portsmouth, so that it continues to reflect the rich history that it is part of and supports our new shared City Vision towards 2040. Our heritage has shaped what and how we are as a city, and will continue to influence where we are going.

Portsmouth is a city that has been shaped by its unique geography as an island city, which created a role for Portsmouth in the national story as a centre of military significance and industrial innovation. This heritage is an important part of the city's past and will continue to be part of its future - the naval base remains an important part of the city's economic base and strategic sectors for growth include advanced manufacturing and marine. Naval and shipping connections are part of what have made Portsmouth a Great Waterfront City. Portsmouth and its people have long had a front row seat in world history.

Understanding and interpreting the heritage story for the city is hugely important, to foster the sense of civic identity, but also because of the importance of our heritage in creating the future for Portsmouth. Heritage themes and assets are crucial to our economic success in years to come. Understanding the past gives us a sense of the present and confidence for the future.

"I think heritage defines Portsmouth more than other cities...you associate yourself with the dockyard and with the naval heritage"

(National Lottery Heritage Fund survey, local respondent)

The challenges of 2020 and into 2021, as the world has contended with a global pandemic, mean that there are huge issues that we now need to contend with. Issues around inequality, health and wellbeing have been thrown into sharp focus, and there will be huge pressures on the public purse. However, we believe that with a vital and strong vision, heritage can be relevant and central to the recovery in our city.

This strategy sets out how heritage can play that part in the future of the city, setting a bold vision to create a city where our heritage is understood, celebrated and integral to the city's life and success. The strategy will guide heritage related activity and investment in the medium term, in support of the wider vision for the city.

What is Heritage?

Heritage is defined by UNESCO as:

Tangible cultural heritage:

- movable cultural heritage (paintings, sculptures, coins, manuscripts)
- immovable cultural heritage (monuments, archaeological sites, and so on)
- underwater cultural heritage (shipwrecks, underwater ruins and cities)

Intangible cultural heritage:

- oral traditions
- performing arts
- rituals

Natural heritage:

Natural sites with cultural aspects such as cultural landscapes, physical, biological or geological formations.

In Portsmouth this could include, but is not limited to:

- The built environment on land and 'at sea', including scheduled monuments and listed buildings
- Our museum and archive collections
- Our natural habitats
- Archaeological sites and collections
- Intangible heritage such as stories, history and traditions
- Underwater heritage, particularly shipwrecks, as well as other maritime archaeology

Our Visions

... for the city

Over the last year, there has been a wideranging, community-led exercise in Portsmouth to describe a vision for the city's future – including reflecting the issues that matter to people in the light of the pandemic. Thousands of contributions were received and considered by a steering group of public, private and third sector agencies in the city to enable a vision for Portsmouth in 2040 to be articulated.

This vision reflected not just the things people wanted to see, but also the way they want the city to feel. Values described by residents included a community focus, collaboration, equality, respect and innovation.

One of the themes that came through very strongly was the importance of heritage and a statement emerged in the vision that in 2040:

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.

...for our heritage

Our vision is to create a city where our heritage is understood, celebrated and integral to the city's life and success

To achieve this vision we will:

- reinforce and develop Portsmouth's distinct historic identity
- invest in the fabric of historic assets and realise viable uses
- ensure that heritage is an integral part of the economic success for the city in the future
- Engage and actively involve people - residents and visitors - in our heritage environment, assets and stories.

The city council will play a leading role in this as the owner of many of the city's heritage assets, but other partners will be critical to the success of this strategy, including national stakeholders such as Historic England and English Heritage, through to local city partners such as the Nava Base Property Trust and the Portsmouth Society. All have a part to play, and all are welcome, to help us achieve our vision.

Portsmouth's rich heritage story

Portsmouth is unique in being largely an island city, with a rich and diverse historic built environment. It has been shaped for most of its history by the strategic advantages of its excellent deep water harbour and its association with the Royal Navy which stretches back almost a thousand years.

Evidence of Bronze Age activity has been found on Portsea Island, along with archaeological finds from the Palaeolithic period in Langstone Harbour and from the Neolithic and Iron Ages on and around Portsdown Hill. The first well-documented human presence in the Portsmouth area was at Portchester Castle, where the Romans and then successive medieval kings maintained a fortification and used the natural harbour to assemble their ships for crossings to France. As the upper reaches of the harbour became silted up settlement in the area moved to the mouth of Portsmouth Harbour, in the area now known as Old Portsmouth.

The Domesday Book lists settlements at Buckland, Copnor and Fratton on Portsea Island and Cosham, Wymering and Drayton on the mainland. At this time the population of Portsmouth was no larger than two or three hundred people.

Sometime between 1170 and 1180 Jean de Gisors, a French merchant, purchased the manor of Buckland. On this land he founded the town of Portsmouth, including building what would later become Portsmouth Anglican Cathedral. In 1194 Portsmouth was granted its first Charter by Richard I. The charter granted the right to hold a weekly market and an annual Fair, the Free Mart Fair, which ran until 1847.

The city continued to develop in importance and its role in national and international events. The town's fortifications were developed, including the Round Tower and Square Tower built in the 15th century. The fortifications continued to evolve over time as new technology was introduced. Portsmouth also continued to play a role in national and international events out of proportion to its size.

In 1545 Henry VIII watched the Mary Rose sink in the Solent during an engagement with the French Fleet and in 1628 the Duke of Buckingham - the de facto Prime Minister - was murdered at what is now Buckingham House. During the English Civil War Southsea Castle was stormed by the Parliamentarians. In 1662 Catherine of Braganza landed in Portsmouth prior to her marriage to Charles II at the Garrison Church. It is believed that Catherine of Braganza brought with her the first tea to be drunk in England.

During the mid-19th century Southsea began to develop as a middle-class suburb and seaside resort. This development was led by Thomas Ellis Owen, an architect who was active from 1834 onwards. Southsea became home to naval and army officers and retired professionals and also developed as a seaside resort. The city has very rarely seen protest or disorder, but in one notable incident in 1874 that became known as 'the Battle of Southsea' local people rioted over proposals to fence off part of the promenade next to Clarence Pier.

The presence of the town and dockyard fortifications constricted development until their demolition in the 1860s and 1870s. When the railway arrived in 1847, for example, the new Town Station had to be built in Landport, well away from what was then the High Street. This led to the development of a new Town Centre around the Station. The route of the railway was also affected by military land use.

For many centuries the fortunes of the town depended largely on whether England was at war, and who with. During times of war the town was often booming, while peace often brought unemployment as the Royal Navy contracted.

The Dockyard saw booms from 1689 to 1698 during preparation for the Spanish war of succession, during the Seven Years War 1756 to 1763, from 1793 to 1815 during the revolutionary and Napoleonic Wars. In 1787 the first fleet left Portsmouth carrying convicts to Botany Bay, in what would become Australia.

In the 19th century, the city cemented its status as the pre-eminent naval base of the world's leading maritime and commercial power. Admiral Lord Nelson left Britain for the last time from Portsmouth in 1805, shortly before the Battle of Trafalgar. The expansion of the Royal Navy and the dockyard led to an expansion of the city's population. Among the workers drawn to the city were Charles Dickens' father John who worked in the Pay Office. The physical legacy of this period is exceptional - one of the greatest concentrations of historic military architecture in Europe, not only in the number of grade I and II* listed buildings in the historic dockyard but also the diverse range of listed and scheduled fortifications in the city.

The Great Extension of 1867 to 1881, when war with France was feared, and during the re-armament from 1880 to 1914 the fortunes of the town were clearly influenced by government policy and by extension, national and international events.

The expansion of the Dockyard continued during the late nineteenth century with the introduction of ironclad and steam driven warships leading a huge expansion of the facilities at the yard. This created one of the single largest industrial sites in the world. At its peak in the mid-20th century the yard employed over 25,000 people, stamping its mark on the city and its inhabitants. It also led to an enviable reputation for scientific and engineering innovation. This is nowhere more evident than in the grade II* listed Block Mills, the site of Marc Brunel's revolutionary machine tools which heralded the age of mass production.

The city's rise to industrial powerhouse was mirrored by rapid expansion, the legacy of which includes a stock of over 60,000 terraced houses, most of them built for labourers and artisans in the dockyard. Some of the best examples are protected within a number of the city's 25 conservation areas.

The identity of Portsmouth as the "home of the Royal Navy" means that it also hosts a number of historic ships:

- HMS Victory - Nelson's flagship, the visual centrepiece of the historic dockyard and the UK's only surviving Georgian warship
- HMS Warrior - UK's first ironclad warship
- The Mary Rose - Henry VIII's iconic flagship
- M33 - a 'monitor' launched in 1915

In 2020 the city also became home to Landing Craft Tank 7074, one of few surviving D-Day landing craft of her type.

The Dockyard continued to be busy during the 'Dreadnought race' of the early 20th Century, when the yard was launching on average one battleship a year. This led to a huge expansion in the town's population, in terms of sailors, dockyard workers and their families, and other supporting infrastructure. By 1911 10,439 labourers were working in the Dockyard, 56% of the industrial workers in the town.

During this period Portsmouth also played host to Fleet Reviews in the Solent to mark significant national events such as coronations and jubilees - which were usually attended by Royalty and often attracted foreign navies.

The city was devastated by the two world wars. The First World War saw in excess of 6,000 people killed - the figure is believed to be much higher - and almost 1,000 people died in the influenza pandemic of 1918. Due to its significant role in national affairs Portsmouth was made a city in 1926, and the Mayor became a Lord Mayor. Of course, the military strength in the city also marked it out as a target. In the Second World War, Portsmouth was amongst the most heavily bombed cities in Britain. Over 900 people were killed. 6,000 buildings were totally destroyed, and tens of thousands damaged. Reconstruction was relatively slow and has left its mark, in the shape of large post-war housing estates but also in the administrative and commercial heart of the city, which is graced with a number of high quality modernist buildings, such as the Norrish Central Library.

Although Portsmouth's industries have been dominated by the dockyard and shipbuilding, a significant supportive infrastructure grew around this, supplying materials and equipment to the Royal Navy, the Dockyard and the people of the town. Commercial shipping in the area was relatively limited until the post-war period due to the control of the Government through the Royal Navy. However the Camber Dock was home to a small coastal trade, including coal and fish.

Brewing was a notable industry, due to the presence of so many sailors, soldiers and dockyard workers in the town - Portsmouth traditionally had one of the highest concentrations of pubs in the country, and was dubbed "Pub Capital of the UK" in a light-hearted survey in 2018, that found the city had more pubs per square mile than any other city in the country.

Other notable traditional industries included ironworks, such as Treadgolds and Sperrings, as well as Chubb locksmiths. The city also long had an established corset-making industry. This was stimulated by the large number of women living in the town looking for employment while men were at sea.

In more recent years the city has become more known for its high-tech industries, still linked to the role of the city in national defence, including aerospace, with companies such as Airbus and BAE Systems having a presence in the city and providing employment for hundreds of residents.

In the early 19th century, the city started to develop in other ways. Under the initial direction of local architect Thomas Ellis Owen, Southsea emerged as a picturesque and elegant satellite resort town serving the needs of military officers and a burgeoning middle class. Its historic core is now a conservation area and has a wealth of listed gothic influenced villas. The area is served by Southsea Common, an extensive pleasure ground and one of the three registered historic parks in the city. In combination with several miles of seafront promenade, it creates a waterfront unusually free of development - a feature that is unrivalled by any city of comparable size in the country.

Other highlights include the exuberant civic pride of the Guildhall, and the birthplace of Charles Dickens, perhaps the city's most famous son and one of a number of the great British writers - including HG Wells, Sir Arthur Conan Doyle and Rudyard Kipling - that lived and worked in the city.

How heritage has shaped Portsmouth's identity

"Heritage is not just old stuff. It connects us, provides a sense of rootedness and place, and it is vital to understanding who we are and what we would like to become. "

Peter Ainsworth, Chairman, The Heritage Alliance

The history of Portsmouth has shaped the city we now know in many profound ways. The city is one of the most densely populated in Europe, and most residents live in close proximity to each other with relatively little open space between them. This density occurred relatively quickly - in the early 19th century Portsea Island was relatively rural, yet by 1900 the island was almost completely developed.

As a natural harbour and a port, Portsmouth has long welcomed visitors and settlers. These have included sailors during the Napoleonic Wars, Polish settlers in the 19th century, Irish immigration during the famine era, Jewish people fleeing persecution in Eastern Europe, a number of Italian families who became well-known for their ice cream such as the Pitassis, the Verrechias and the Dagostinos, and post-war settlers in the form of the Windrush generation, and from South Asia and China.

As a city that has long been home to a large number of sailors, soldiers and dockyard workers, Portsmouth has played host to a range of **colourful leisure pursuits**. Portsmouth has been well known for its large number of pubs, many of which date from the height of the dockyard. In 1871 the city had 323 pubs. Notable local pub architects include A.E. Cogswell and A.H. Bone. The city is also home to two Frank Matcham Theatres - the New Theatre Royal opened in 1900, and the Kings Theatre in 1907.

Since its formation in 1898 **Portsmouth Football Club** has played a significant role in local identity. It is the most successful football club on the south coast and has a well-known loyal following. The Dockyard also led to the development of the Dockyard Football League, which saw departments of the dockyard forming their own teams. From the mid-19th century Portsmouth has also developed as a seaside resort. The seafront promenades and piers date from this period.

Faith has also played a significant role in life in the city. The first church on Portsea Island, St Mary's, opened in 1164. The first Synagogue in the city opened before 1749.

Portsmouth's population has long had a complex set of **gender roles** with women playing an important role in life in the city. Many men often spent years away from home with the navy or the army. This left wives alone for long periods to bring up families, but a number of industries based around the skills of the women flourished, such as corsetry.

The impact of the army and navy presence in Portsmouth meant that the city developed very differently to other places. The purpose of the Dockyard and the Army Garrison shaped behaviours and attitudes within the city. The presence of Government control in the form of the armed forces, meant that historically there

were limits on commercial activity, which affected the ability of the inhabitants to develop income levels, class structures and spending habits typical of other cities.

Our heritage environment

There are three registered parks and gardens in Portsmouth, which meet the criteria of special historic interest:

Southsea Common (registered Grade II, 2002) - at 82 hectares, the Common is by far the largest expanse of open space in the city and serves an important function in terms of informal recreation as well as for organised events, particularly in the summer months. Historically the site of a large swamp known as the Great Morass, the area was maintained as open space by the military to provide an open field of fire for the nearby scheduled Southsea Castle (c.1540). Purchased by the city in the late 19th century although not legally a common, the Common was gradually laid out as a pleasure ground. Dominated by a large expanse of open grassland it also incorporates a diverse variety of different elements, including a series of tree-lined avenues, rock gardens and a canoe lake.

Kingston Cemetery - southern section (registered grade II, 2003) - Kingston Cemetery was opened in 1856 in response to the Burial Board Act of 1854. The cemetery was later extended and reached its present-day extent of around 20 hectares in 1910. The grounds contain a pair of grade II listed neo-gothic chapels by local architect George Rake, who also designed the entrance gates. It also contains a number of listed memorials.

- **Victoria Park** (registered grade II, 2002) - a charming and formally planned picturesque park established in 1878, Victoria Park is a city centre oasis. At 3.5 hectares the site is perhaps the most attractive area of open green space in the city, and is home to a variety of individually listed monuments, an original fountain and a popular aviary and small animal enclosure. Victoria Park is currently the subject of a National Lottery Heritage Fund (NLHF) grant which was awarded in 2019.

There are also many buildings and structures which add interest to the city's character, and are of architectural and/or historic interest, that are not protected by listed building status. Domestic buildings, schools, churches, shops, libraries and public houses - particularly from the Victorian and Edwardian periods - all contribute interest and variety to the city's streetscapes and are often landmarks in areas of terraced housing. There are also significant examples of civic pride and municipal function, such as the Guildhall, the Park Building, Eastney Beam Engine House, Kingston Prison and the former Workhouse.

The extensive development of historic and modern Portsmouth has left the city poorer in pre-urban archaeological remains, with few ancient monuments. There are for example no hill forts, Roman villas or burial mounds. However, artefacts recovered during development over the decades do indicate that prehistoric, Roman and

medieval occupation must have existed on Portsea Island and areas not compromised by modern development have the potential to shed light on this otherwise lost component of Portsmouth's past. Recent excavations in Fratton have shed light on one of the earliest settlements on Portsea Island.

Heritage Impact - our strengths

Recent National Lottery Heritage Fund research on Portsmouth demonstrated that people place a high value on the city's heritage. A number of heritage assets, including the historic dockyard, are already key elements of the city's image and make a significant contribution to the local economy.

In addition, the Historic Environment Record (HER) has 1676 records relating to sites in the City of Portsmouth. This figure includes:

- 751 historic buildings (including 454 Listed Buildings and buildings on the City of Portsmouth Local List of Buildings of Architectural and Historic Interest)
- 18 Scheduled Monuments
- 3 Registered Parks/Gardens
- 190 Archaeological find spots

The HER also has 232 records relating to archaeological investigations within the city. The HER has recently launched a Facebook page which will aim to crowd-source heritage, for example encouraging residents to send photos of historic street furniture for recording on the HER.

Visitor economy

Regional economic aspirations are set out in the Solent LEP's Strategic Economic Plan, which identifies a number of strategic growth sectors, including marine/maritime and advanced manufacturing; and the visitor economy.

The Solent region has a robust visitor economy founded on significant heritage and natural assets. The Solent visitor economy is worth £3bn, supporting nearly 63,000 jobs. The sector is an increasingly important factor in the diversification away from reliance on traditional industries and larger public sector employers. A November 2013 report by Deloitte highlighted that the tourism economy was set to grow at 3.8% per annum, faster than manufacturing, construction, and retail - with inbound tourism the key driver of growth.

Analysis suggests that the Solent has a lower proportion of the visitor economy workforce that the national average, which indicates that there is scope for growth in the sector.

A recent study commissioned by Portsmouth City Council on the economic impact of tourism in Portsmouth highlighted that visitor expenditure in the city is in the region of £463m, supporting almost £601m of income for local business through additional indirect and induced effects. This expenditure is estimated to have supported around 12,500 actual jobs (c.9000 FTEs when part-time and seasonal work patterns are accounted for).

Clearly there is strength within Portsmouth's local visitor economy and opportunities for further growth. Historic places and buildings attract visitors and are an essential element of the city's tourism offer, encouraging domestic and overseas visitors.

However, we also recognise that there are some challenges that come with these associations, such as a city image that can be perceived as narrow and overly

military-history focused - these are gradually being overcome through strong, coordinated marketing, and an increased association with prestigious, large-scale events, that nonetheless showcase the heritage in the city. This synthesis of the old and the new is key to driving development of the visitor economy in the city, to a more diverse, vibrant, year round offer.

Culture

Heritage and context are an essential part of cultural wellbeing. They are a physical embodiment of human achievement in the arts, design and construction - and provide opportunities to reflect on other areas of excellence such as science and engineering. As such, the heritage of an area has intrinsic value. In Portsmouth, heritage buildings provide theatre spaces, libraries, museums and attractions, places of worship and reflection. The historic context provides inspiration for art, entertainment and for intellectual and civic engagement - recent projects to highlight the sacrifices made by men in the First World War and on D-Day by posting notices in the streets where they lived have demonstrated the power of heritage to engage residents to feel and think and find common purpose and understanding in a way that few other types of engagement can manage.

There are a number of recent examples of the city's heritage inspiring cultural regeneration. The Victorious Festival, Strong Island and Pompey Banana Club are all examples of creative and cultural entrepreneurs mobilising the city's heritage as social capital in new and exciting ways. The success of these brands show how successful heritage-led regeneration can be, including using intangible heritage.

Community engagement

In February 2015 the National Lottery Heritage Lottery Fund published a report, *20 years of heritage lottery funding in local areas: Portsmouth*. The report fed back on a survey of local people's attitudes to heritage in the city and analysed the impact of the NLHF's substantial investment in the area. The NLHF had awarded a total of £58m to 67 projects in the Portsmouth area in the past 20 years, but we are ambitious about attracting funding in the future.

Recent NLHF supported projects have included:

- The transformation of the Mary Rose Museum, which re-opened in 2012.
- The Dickens Community Archive project, which coincided with the bicentennial of Charles Dickens' birth in 2012.
- The Lest We Forget community project which marked the centenary of the outbreak of the First World War in 2014.
- Several community projects to mark the 70th anniversary of D-Day in 2014, including 'Launching the Invasion' which looked at D-Day Heritage locally.
- The transformation of the D-Day Museum into the D-Day Story, which reopened in March 2018.
- Wild About Portsmouth, a project to shed light on the city's natural history collections
- Capturing the Spirit, a project to capture the memories of the first generation of people to move to Paulsgrove in the late 1940s.
- Landing Craft Tank 7074, a partnership project between Portsmouth City Council and the National Museum of the Royal Navy to display LCT 7074, a D-Day landing craft, outside the D-Day Story

The research confirmed that people's awareness of local heritage is high, particularly in relation to some of the most prominent sites, such as the historic dockyard. It highlighted that participation is a mixed picture, but that overall satisfaction with sites and projects is high.

By comparison with the other 11 cities surveyed as part of the same project Portsmouth residents were more satisfied with the heritage on offer in their area, and perceived that it had improved in recent years. However, there was more criticism than elsewhere about the distribution of investment in different areas of the city. There was general agreement amongst survey respondents that heritage and investment in heritage have a positive impact on Portsmouth's environment - 81% of respondents agreed that Portsmouth's heritage sites and projects make it a better place to live.

Our Challenges

Accommodating growth aspirations

The council has set out significant aspirations for growth, including in the numbers of homes that are provided in the city. However we recognise that these aspirations will be challenging to achieve in the context of land constraints in the city. Sites for development at a strategic level are few, and have a number of complexities including ecological sensitivities and in some cases, heritage buildings and structures that will need to be taken into account. The Local Plan review process, through the related Housing and Economic Land Availability Assessment (HELAA) and through the identification and allocation of Major Sites, has identified instances where development has the scope to impact on heritage assets. These include:

- The city centre and related road scheme: potential increases in building density and an increase in for tall buildings have the scope to impact on designated assets such as All Saints and St Agatha's churches, designated assets within HMNB Portsmouth and nearby sites including Victoria Park.
- St James' Hospital site: conversion and new build development proposals on this site may affect both the fabric and setting of this large grade II listed hospital, and its related listed Chapel.
- Lennox Point: proposals under consideration for this radical development at Tipner will affect the fabric and setting of a number of structures on the peninsular associated with historic use as a magazine.

There are other smaller development opportunities in proximity to assets that will require careful consideration through the plan-making process. In some cases, sympathetic reuse of the assets will be key to delivery of sites. We believe firmly that heritage, both tangible and intangible, far from being a barrier can be a valuable asset.

Deteriorating heritage condition

Heritage at Risk is a programme initiated by Historic England (HE) in the late 1990s to help protect and manage certain classes of designated heritage asset. It identifies (using a checklist of published criteria) those sites it considers to be most at risk of being lost as a result of neglect, decay or inappropriate development. These assets are entered onto an 'At Risk Register' that is maintained and updated by HE on an annual basis. It is used by them to raise awareness around their condition, and to engage with stakeholders around identifying positive solutions for assets on the register. The scope of the register extends to places of worship, archaeological sites, conservation areas, registered parks and gardens and protected wreck sites. It covers buildings and structures listed at Grade I and II*, but with the exception of places of worship, those listed at Grade II are not covered.

Portsmouth has [17 entries on the 2019 register](#). This is a small increase on previous years, which has occurred as a result of the recent inclusion of a number of churches.

The exclusion of Grade II buildings from the HE register means this does not capture all of the challenges in the city. HE encourages local authorities to produce their own *at risk* registers, to support the identification of assets for regeneration and enhancement. This is an area that may need to be taken forward to support prioritisation, particularly in the context of constrained resources.

Population health and wellbeing

There are a number of areas where Portsmouth's broad outcomes across a range of issues affecting health and wellbeing compare unfavourably with other areas.

We know that after the early years foundation stage educational attainment in Portsmouth declines relative to other areas. The progress children make between Key Stage 1 and Key Stage 2 is not as good as nationally, and by GCSE level (Key Stage 4), Portsmouth pupils have some of the lowest outcomes in England. The city is now seeking to drive improvement in educational attainment in Portsmouth through a new strategy that takes account of the changing landscape relating to education, and seeks to address key issues, including teacher recruitment and parental engagement.

The city has high levels of unemployment and economic inactivity compared with the rest of the South East region and the Hampshire Economic Area (4.9% unemployment compared with 3.5% in HEA and 3.4% in the South East). Despite recent improvements, the city also has a higher proportion of 16-18 year olds not in education, employment or training than in neighbouring areas and in the region (5.6% in Portsmouth compared to 3.9% in the SE region). More adults in the city have no qualifications than in surrounding areas, and fewer adults are skilled at the highest levels. Life expectancy for both Portsmouth males and females is now significantly shorter than the England average.

The pandemic has increased some of these challenges. There are fewer people in employment than before the pandemic, and impacts in issues such as mental health, physical wellbeing and educational attainment have yet to be fully understood, although there are early signs of some of these issues bubbling up.

We need to link the role of heritage in the city to this critical moment of recovery. Matt Hancock, former Secretary of State for Health and Social Care commented in 2018, before the pandemic, that "what the NHS does is life-saving. But what the arts and social activities do is life-enhancing." As we move into a new phase, there is an opportunity to position heritage sites and stories as avenues enable calm and peace, and be places of awe and beauty that can appeal to residents and visitors alike. We know from our work that heritage can be a valuable route in to engagement and social inclusion too, a hook that enables residents and visitors to access not just heritage but so many other elements of our work.

Inequality

We know that some of our population experience a range of challenges, and so engagement and involvement with heritage issues are not always equal. Health inequality is worsening across the city and is linked to a range of determinants, including financial circumstance, education levels, housing, environments and social inclusion. Black and minority ethnic groups are often disproportionately represented in poorer health outcomes, and across a number of the other domains. For some of our population there are challenges and circumstances which means that it can be harder to engage with communities around heritage issues. It also means that sometimes a negative perception of the city can grow. These are important contextual challenges to consider when articulating the role of heritage in the city and demonstrating its value.

The DCMS regular "Taking Part" survey had repeatedly found that visitors to museums and galleries are disproportionately made up of well-educated professionals in the 55-75 age bracket, and the Understanding Society survey found that adults are less likely to visit heritage sites if they are aged 16-25, of Asian or Black ethnic origin or in poorer financial circumstances. Locally, the "20 years, twenty places" report highlighted that younger people, those in the DE socio-economic groups and black and minority ethnic people are still all less involved in heritage than others. Inequality remains a huge challenge for the country and city alike, but research demonstrates that heritage can play a powerful role in bringing people together and helping to improve perceptions of quality of life.

Our Opportunities

Levelling up

In his foreword to the Annual Report 2020 of the Heritage Alliance, Nigel Huddleston MP, Minister for Sport, Tourism and Heritage, wrote:

"As we move forward, heritage should remain instrumental in supporting our wellbeing and building a brighter future for our nation. Heritage helps to strengthen our towns and cities, levelling up places across the country and fostering close community cohesion."

There are many areas where Portsmouth has challenges, including around employment and skills levels, and educational attainment, where the city lags behind the performance of the wider south east region. In identifying the levers to bring the city up to the levels of wellbeing and prosperity enjoyed elsewhere, the city has identified the need to leverage both the visitor economy and cultural and creative sector in the city, including the heritage offer. These themes have been central to an early bid made to Government's Levelling Up fund.

Partnership working

The historic environment facilitates and encourages civil society in the city. It supports positive leisure, cultural and educational activities for individuals and wider communities. Heritage assets can also act as a catalyst, galvanising local groups and third sector organisations (such as charitable trusts) into action. Examples of this in Portsmouth include the trusts tasked with running the city's three principal performance venues. Preservation trusts have also emerged to conserve and improve the medieval Wymering Manor (the oldest building in the city), the 1930s Hilsea Lido and the Southsea Skatepark.

This richness of interest and expertise provides the city with a significant platform to take forward further schemes. The city also has a track record of working with other developers and trusts to bring forward successful heritage-based schemes. Highlights include the numerous enhancements which have taken place within the Historic Dockyard over the last 10 years, and outside of the dockyard the prominent success is the Hotwalls artists studio project in the 17th Century fortifications at the mouth of Portsmouth Harbour.

JOINING UP WORKING IN THE CITY

In line with the values set out in the city vision, the work that we will be taking forward on heritage in the city will have collaboration at its heart. It will therefore recognise other key documents and frameworks that influence developments in the city:

The Local Plan - The planning policy framework for Portsmouth is currently provided by:

- The Portsmouth Plan (The Portsmouth Core Strategy) adopted in January 2012 and
- Two Area Action Plans for Somerstown and North Southsea (2012) and Southsea Town Centre (2007).
- This framework is supplemented by a number of saved policies from the Portsmouth City Local Plan (2006).

The Local Plan is currently being refreshed and this new document will update and replace the three documents currently in use. It will include policies for the development and protection of land and site allocations for new development or for the re-development of existing buildings. The Local Development Scheme gives a timetable of activity that may be updated as the plan progresses, and a Statement of Community Involvement sets out how we consult when dealing with planning applications and preparing the new Local Plan.

The NPPF requires that:

“Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

a) assess the significance of heritage assets and the contribution they make to their environment; and

b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

The approach to heritage and conservation in the current plan is guided by policy PCS23. This sets out that all new development must be well designed and, in particular, respect the character of the city. One of the key objectives of the policy is to protect and enhance the city's conservation areas, listed buildings and other heritage assets.

Economic development and regeneration strategy - The city's economic development and regeneration strategy will help businesses and organisations in the city to work to a common goal for the next ten years or more.

It was finalised after a year of consultation, research and working with economic experts. Residents, businesses and local organisations were able to give their feedback, to make sure the final strategy would meet the needs of the city. By having an agreed strategy, the city will be in a stronger position to claim funding from government and boost economic growth.

The 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 locating a business.

Portsmouth Creates - Portsmouth Creates is a catalyst organisation, with to enable change, nurture careers, foster business growth and to raise the aspirations and ownership of culture within the city. With a core principle that culture is a right, not a privilege, and that everyone deserves access to the benefits that cultural engagement brings, and to see themselves and their communities represented in the best of what the city has to offer. One of the key tasks for Portsmouth Creates is the development of a cultural strategy for the city that will set the path for the development of the local cultural scene, including how the heritage offer can thrive as part of this.

INFORMATION AND EVIDENCE

If we are to meaningfully manage and promote the city's heritage then we need to hold good information and records about this. Heritage information has a wide number of applications, and importantly, it is a statutory evidence base used to inform planning applications and some of the city's most valuable assets.

The information we hold about our past feeds into education and research, and is an important resource to local people investigating their heritage.

Key sources of evidence and information include:

Portsmouth Historic Environment Record - The Historic Environment Record (HER) is the primary source of information for archaeology and historic sites within the city of Portsmouth.

The HER database includes details of archaeological sites, finds and historic buildings that date from the Prehistoric period to the present day. The database is linked to a series of digital maps marking the location of sites recorded. There is also an archive of excavation reports, slides, photographs, research files and journals, which are held within the museum archaeology collection.

The database has been compiled using a variety of sources, such as archaeological reports, publications, historic documents and maps.

It includes:

- Stray finds (e.g. objects found in the garden or on the beach)
- Archaeological sites and investigations
- Scheduled Monuments & Listed Buildings
- Buildings recorded on The City of Portsmouth Local List of Buildings
- Non-listed buildings
- Parks and gardens
- Monuments and memorials
- Historic sites known from documentary sources

HER data is primarily used to inform planning decisions and is consulted by planners, developers and archaeologists working on a variety of projects, including housing and coastal defence. The HER is also an invaluable tool for anyone interested in the archaeology or historic environment of the city, whether for academic research or personal interest.

Conservation Areas - Portsmouth has 25 conservation areas, including Old Portsmouth, Thomas Ellis Owen's Southsea and the older part of HM Naval Base.

Designation as a conservation area means new development should help preserve or enhance the character and appearance of areas of architectural or historic interest. Designation also controls works to trees and demolition of buildings. Some conservation areas in Portsmouth have additional protection called Article 4 Directions. All of the Conservation Areas have a strong research and evidence base which explains the significance of the areas and identified the key features.

National List of Buildings - A listed building must possess special architectural or historic interest to be included on the Historic England national list of buildings of architectural or historic interest. Buildings under ten years old cannot be listed. Read more about the different types of building listing in the leaflet below.

Portsmouth's listed buildings are typically:

- almost all those buildings built before 1700
- most Georgian period buildings (1714 to 1837)
- buildings of definite quality from the Victorian and Edwardian periods (1840 to 1914)
- twentieth century buildings of exceptional quality.

The Portsmouth list includes:

- over 600 listed buildings, including 12 Grade I listed buildings
- 17 ancient monuments
- three historic parks and gardens.

Local List of historic buildings - There are many buildings and structures of visual interest not protected because they do not meet national criteria, but they do add interest to the character and variety of Portsmouth. Schools, churches and public houses (particularly from the Victorian and Edwardian periods) all contribute interest and variety to the streetscape and are often landmarks in areas of terraced housing.

To help highlight and protect these buildings of local interest, the council compiled its own local list of historic buildings and structures, with 267 entries referring to about 500 addresses. You can download the local list below.

The policy concerning buildings of local interest is included in the Portsmouth City Local Plan.

Other buildings in the city have blue plaques commemorating the people who once lived and worked there.

Portsmouth Papers - A series of essays by local historians examining aspects of the city's history, drawing on the wealth of sources available locally.

Portsmouth History Centre and Records Office

The Portsmouth History Centre is on the second floor of Portsmouth Central Library and comprises:

- City Records Office Archive
- [Library resources on family, local and naval history](#)
- [Arthur Conan Doyle and Charles Dickens collections](#)

Resources available include:

- **Parish records from Anglican Churches in the Portsmouth Diocese**
- **Records from Portsmouth City Council, including** Quarter sessions records 1670 – 1882; School records; Rate books; Civil defence records from the second world war
- **Records from workhouse, including** Board of Guardians minute books and Creed registers 1879-1953 (which served as admission registers).
- **Records from the City Librarian's collection (known as 11A)** - documents collected by the City Librarian including settlement certificates, apprenticeship indentures, correspondence and antiquarian papers.
- **Records from the police** - staff and administration records
- **Records from Royal Naval & Royal Marines Orphanage**

A number of the documents can be made available for public examination, although there are restrictions on some due to their very fragile nature. .

A heritage strategy for Portsmouth

Our vision:

A city where heritage is understood, celebrated and integral to the city's life and success.

To achieve this ambitious vision, we have three main aims

- reinforce and develop Portsmouth's distinct historic identity
- invest in the fabric of historic assets and realise viable uses
- ensure that heritage is an integral part of the economic success for the city in the future
- Engage and actively involve people - residents and visitors - in our heritage environment, assets and stories

AIM ONE

Reinforce and develop Portsmouth's distinct historic identity

In recent decades cities have tended to become increasingly homogenous in their character - similar architecture, facilities and increased chain businesses have all contributed to this trend. Portsmouth is no exception, and yet it remains a city with a distinct sense of place, an identity derived from its unique geography, long association with the Royal Navy and the special character of its historic environment.

This distinctiveness is all part of the civic personality of the city. This personality is conveyed in the character which the city presents to residents, visitors or investors. It finds tangible expression in historic buildings, spaces, symbols and rituals. Investment in the physical and cultural historic fabric contributes directly to the robustness and resilience of the civic personality and to the retention of the distinctiveness of the city.

In support of this aim, we have developed two key objectives:

Objective A: Broaden the appeal of the city's heritage offer and widen participation.

Portsmouth is as it is because of what has happened in its rich history. That history will shape and influence the future, so it is right that we should aim to engage and excite the people of the city (and visitors and partners) about the heritage stories. There are so many tales to tell and implications to explore from these that have direct relevance to the city now.

This includes the imprint of 600 years of military history. But sometimes the wider stories in the city are forgotten against this. There are different stories to tell - for example, the stories of the women in the city, and more recent stories such as the contribution of communities newer to Portsmouth - the Windrush generation for example. We want to tell the rich and varied stories of the people of the city, particularly those that are not widely known or understood, or may even be difficult or uncomfortable.

The city rightly celebrates its extraordinary military associations, but this doesn't speak to everyone, and for some, even has negative connotations. And whilst it is an important part of the heritage story and offer, it is not the only story. We need to continue celebrating this - but recognise that there is so much more to our beautiful and fascinating city. There are many stories that are yet to be told widely - military wives, war widows and orphans, immigrants and settlers.

Objective B: Develop the understanding of and engagement in the city's heritage

We need to develop a stronger shared understanding of some of the opportunity for heritage to contribute to the city's future success across the economic, environmental and social domains. There are pockets of incredible passion for heritage in the city, with individuals and groups doing incredible work to safeguard assets and stories, but more could be done to share this knowledge and contextualise it other work taking place. A shared understanding of heritage could help in articulating a vision for the city, developing a cohesive look and feel for certain elements to tie things together and assist in prioritising bids for resource.

To achieve these objectives, we will:

- Work through our museums and libraries and archives service, and with communities to develop a programme of exciting heritage related activities and events, building on the success of the Portsmouth Revisited exhibitions.
- Portsmouth Papers - we will review this landmark series - which recently published its 80th edition since 1967 - to ensure that it works for modern audiences and contributes to developing a place narrative for the city.
- Be less Southsea/Old Portsmouth centric - we want heritage to be for everyone in the city. Heritage does not have to be about particular areas, as every part of the city will have its own unique story. In terms of ownership we want residents to feel that heritage is everywhere, and for everyone. Heritage does not have to be limited to particular buildings. The story of the city is all around us, in street names, road layouts, historic street furniture.
- Widen participation with heritage services and venues, particularly in demographic segments that are not currently reached.

AIM TWO

Invest in the fabric of historic assets and realise viable uses

The NLHF research in Portsmouth demonstrates that people place a high value on the city's heritage. With imagination and confidence, the city's heritage has the potential to deliver real regeneration - delivering social and environmental benefits as well as physical and economic benefit. We believe that heritage assets that need to be strengthened and enhanced are not 'liabilities' or 'barriers'. They are opportunities that must be grasped. The key to securing their future lies in finding viable uses that are sustainable over the long term.

In support of this aim, we have developed two objectives:

Objective A: Care for, improve and celebrate the city's historic assets

The city council is the freehold or leasehold owner of a range of designated and undesignated heritage assets in the city. These include not only buildings but also street furniture and other structures such as monuments and memorials.

Understanding the condition, value and potential of these assets can be the basis for decision-making about their management, use, alteration or disposal, and can in turn highlight opportunities for change or constraints.

In the authority, it would be useful to develop guidance to steer the sympathetic and appropriate management of the city's heritage assets. The credibility of the Council's role as a steward of its own assets and as a regulator of change to other's historic buildings requires the authority to be seen to achieve the standards it expects of others. We want to mobilise the potential of our heritage assets, place them in context and tell their stories.

As well as this, the authority also maintains a local list, to contribute to our positive strategy for the conservation and enjoyment of the historic environment. Both the identification of the assets and the weight they are afforded in the development management decision process helps the council to deliver better, more 'conservation centric' decision making. However the list has not been reviewed for some time, and the refresh of the Local Plan provides an opportunity for this review to take place and for accompanying policy to be incorporated in the Local Plan. In addition it will be an opportunity for the city to consider how it protects its 20th Century heritage.

Alongside this, there is also an opportunity to consider the development of a local 'at risk' register. Work has previously taken place on this, but was not formally adopted at the time. This remains valid and could therefore serve as the basis of a reviewed register for the city. The register would inform future pipeline planning in relation to heritage assets and identify potential projects.

Objective B: Identify future options for key heritage to enable the promotion of schemes for improvement.

The strategy for heritage will need to identify the built heritage assets in the city that need conserving and reinventing. There is a good knowledge base around the needs for some of the assets including those not in local authority ownership but there are some assets for which the need and potential are less well understood. The authority has identified a number of potential projects among assets that are a scheduled ancient monument, listed at grade I, II*, or II, locally listed or public realm within a conservation area.

The assets which have been identified as needing enhancement are not 'fixed'. Assets might be added or removed to the list as more information becomes known. The purpose is to capture as much information as possible to ensure that the authority and partners are in a position to describe the scale of challenge and opportunity for the city in relation to heritage and to capitalise on opportunities for support and funding when they become available.

On land within its ownership or control the city council has the principal role to play in delivering improvement. It cannot however deliver on all sites and cannot deliver alone. Work across the public, private and third sectors will be necessary, as will close collaboration and partnership working with investors and owners.

It is likely that many site specific enhancements will be dependent on external funding. The resources which the local authority can provide will in some cases be financial, but are also likely to take the form of staff time or other forms of support. This will include supporting and promoting bids to funding agencies for the improvement of assets. It is important to note that the financial constraints of recent years have not resulted in an end to investment in heritage assets in the city - on the contrary, a number of high profile and important schemes have been brought forward. This demonstrates the grasp that key stakeholders in Portsmouth have of the funding landscape, and the capacity to achieve high impact outcomes.

Where the disposal of an asset is under consideration, it should clearly set out that the over-riding aim of the disposal will be to secure an optimal end purpose, rather than necessarily the highest price.

To achieve these objectives, we will:

- Draft guidance for the sympathetic and appropriate management of the city's assets.
- Review the Local List and associated policies around inclusion and additions
- Progress work relating to a local 'at risk' register
- Promote schemes and seek funding to address the heritage projects set out in **Appendix A.**

AIM THREE

Ensure that heritage is an integral part of the city's future success

There is a direct relationship between the quality of an area's built environment and an area's economic development potential. Well maintained heritage assets help project a positive image, improve investor confidence, attract higher value jobs and create competitive advantage.

The social potential of heritage is also considerable. Heritage plays a huge role in the city's identity today. It enables people to demonstrate and contribute to civil society, encouraging and supporting leisure, cultural and educational activities that are positive for individuals and communities.

There is also positive environmental impact from heritage. Heritage buildings have already demonstrated resilience, and by reusing these, the damaging effects of new construction are avoided - the regeneration and reuse of historic assets is an inherently sustainable activity that retains the embodied energy that has already been consumed in their construction. Reuse is likely to be the least resource and carbon intensive form of development.

In support of this aim, we have developed two objectives:

Objective A: Recognise the role of the heritage offer in positioning Portsmouth's future economic development strategy, including through the cultural offer.

Culture and leisure help to make Portsmouth a great place to live, work and visit. The leisure and visitor economy is the largest employer in Portsmouth with in excess of 10,000 jobs. Since 2010 creative industries has seen the strongest growth in employment of all sectors with 10% per year. Our approach to developing heritage spaces to support small businesses, particularly artisanal business, is directly aligned with the wider regeneration objectives.

In June 2019 Portsmouth welcomed royalty and heads of state to the city for the national commemorative event for D-Day 75, which showcased the city as leading remembrance and reflection. The D-Day Story re-opened in March 2019 after a £5m redevelopment and was shortlisted for the European Museum of the Year Award. Our associations with significant events and history present unique opportunities that we will continue to build on, driving economic benefit across the city.

Objective B: Recognise the role of the historic environment in the supporting the wider wellbeing of the city

In order to provide a pleasant environment for residents, and to be attractive as a proposition to visitors or investors, a city needs to feel welcoming and there needs to be contrast with some of the features of an urban environment that can be overwhelming. Heritage assets can enhance the look and feel of a place,

contributing to a sense of identity in a landscape. This in turn can support positive lifestyle behaviours that contribute to other outcomes - getting out and walking about the local environment, for example. All of these factors came strongly into play in the pandemic, where our open spaces - many of which exist as part of the city's heritage - became vital to the city, providing places for people to exercise or meet people safely.

There are clear opportunities to think about how the links between heritage and wellbeing can be more strongly explored and developed. The links between mental and emotional wellbeing and engagement in heritage are well evidenced, and pulled together helpfully in the Heritage Alliance report from 2020, which noted that active engagement with heritage supports the five pillars of mental wellbeing identified by the New Economics Foundation. But we also need to explore options around the physical wellbeing of the city, and exploring how we can use heritage walks, for example, to get people moving, and linking the heritage offer to the social prescribing offer.

Since the Civic Amenities Act (1967), Planning Authorities have been able to designate areas of 'special architectural or historic interest, the character of which it is desirable to preserve and enhance.' Portsmouth's first conservation area, Stanley Street, was designated in 1968. Since that first designation, a further 28 areas have been designated. These conservation areas are important in preserving wider public realm and protect attractive areas within the city. These areas are listed on the City Council website. Local practice was recognised in the English Heritage document "Valuing Places: Good Practice in Conservation Areas).

The majority of the city's conservation areas have been subject to gradual evolutionary change and the impact has been relatively modest. There are a number of supporting appraisal and policy documents, and for the most part these remain factual and credible, although they do require a refresh to ensure compliance with the National Planning Policy Framework and most recent guidance from Historic England. This process will be an opportunity to consider afresh where there might be opportunities for more overt interpretation of the historic environment, or where there could be more enhancement.

It is not considered that further areas of the city should be designated as conservation areas. The comprehensive historic coverage of existing conservation areas (medieval to late 19th/early 20th century) make 20th century townscape the most likely future candidate for consideration, although there are no obvious examples at present.

To achieve these objectives, we will:

- Champion heritage spaces as enablers to cultural and business development
- Champion heritage as a cornerstone of the city's visitor offer
- Refresh existing conservation area appraisals and identify further opportunities for enhancement of the heritage landscape.
- Develop the city's heritage offer of events, including Heritage Open Days
- Embed heritage within wellbeing and engagement in the city

Governance and Delivery

The Heritage Strategy will be led by Cabinet Member for Culture and City Development, who will receive an annual report on progress against the objectives set out in this plan.

In addition, to drive the themes set out in this document, the local authority will convene a "Heritage Working Group" to build on previous good work in the city and drive a next phase. This group will comprise a range of relevant stakeholders including representatives from the Portsmouth Naval Base Property Trust, the University of Portsmouth, Historic England and the Portsmouth Society as well as community representatives. The local authority representation will include planning expertise, property services and the museums service to consider wider opportunities for joint working in bringing the city story to life.

Noting the importance of ensuring diverse representation, and tackling barriers to accessing the heritage environment and offer, we will also seek to broaden the representation on the group to go beyond the usual representatives and bring different perspectives. We will build on the hugely successful public engagement around the Imagine Portsmouth vision work in order to achieve this.

The group will collectively consider the prioritisation of projects and how to capitalise on opportunities as they emerge, bringing their wide range of skills, knowledge and expertise to bear. It will not be confined exclusively to issues relating to the built environment, but will also consider any other heritage or conservation issues that need to be considered.

Dedicated Heritage Champion

Portsmouth City Council also has a Heritage Champion, currently Cllr Lee Hunt. The role of the Champion is

"To act as a positive focus for officers and the local community at elected member level in respect of the relevant section of the community or range of activities designated by the Council through its committees or panels so as to ensure that full consideration is given to the impact of Council activities and decisions upon that section of the community or range of activities."

The key tasks of the Champion are:

To make contact with local organisations concerned with the designated section of the community or range of activities and to establish effective and regular consultation arrangements with those organisations.

(b) To represent the views of such organisations to officers, the Council, the Cabinet, Overview and Scrutiny Panels and other committees, on all relevant aspects of the Council's activities.

(c) To act as an advocate on behalf of the relevant section of the community or range of activities within the council as an organisation and its wider community

- (d) To become familiar with the needs and priorities of the relevant section of the community, or range of activities concerned, and to weigh up interests expressed in order to provide sound advice on the implications of alternative courses of action
- (e) To feedback decisions of the Council and to explain the Council's position on specific issues of concern to relevant organisations and to individuals involved.

Appendix A - Potential Heritage Projects

Understanding and expressing the values and benefits which the historic environment and its regeneration offers is essential in recognising the potential of individual buildings or sites. To an investor, funder or the community, evidence of this understanding is typically an early and crucial step in 'making a case' for funding or support. The pages here set out a range of projects where we will be seeking opportunities to progress improvement and development projects.

In addition to an asset being affected by one of more of the following issues:

- deteriorating or poor physical condition
- vulnerable due to current or future funding issues
- unoccupied, or partially/under-occupied;

A number of evaluation criteria have been identified against which to help prioritise future heritage projects in the city. These include:

- heritage status: if we are looking at a built asset, we will consider the designation and prioritise Scheduled Ancient Monuments, listed at Grade I,II* or II, locally listed or public realm within a conservation area
- public benefit: we will consider the extent to which the proposed heritage project delivers public benefit
- local significance: any heritage project will be considered in the light of the significance to the local community
- strategic overlap: the project may have a relationship or 'fit' with relevant strategies, policies or initiatives of the council or other stakeholders.

We have broadly categorised these as follows:

- Historic Fortifications
- Working Naval Base
- Portsea
- Wider Cultural & Industrial Heritage
- Public realm

Historic Fortifications

Project 1	Fort Widley and Fort Purbrook
Description	Large historic military forts, both structures are located on Portsdown Hill overlooking the city. Their size makes repairs and ongoing maintenance costly. Both are Scheduled Ancient Monuments, and are in use as youth activity centres run by a charity. Fort Purbrook is on the Historic England 'at risk' register. The Barrack Block bridges are in particularly poor repair and work is underway to explore a grant-funding solution for their repair, as well as a route to putting future repair and maintenance on a sustainable footing.
Objectives supported	Care for, improve and celebrate the city's historic assets
Potential outcomes	Improved condition of significant hill forts, supporting ongoing usage
Lead organisation/partners	Historic England, Portsmouth City Council, Peter Ashley Trust
Potential sources of funding	Historic England funding; Portsmouth City Council and Peter Ashley Trust match funding
Timescale	Work to establish suitable lease to enable funding to be put in place underway in 2020.
Project 2	Hilsea Lines and Linear Park
Description	<p>Located on the northern edge of Portsea Island, Bastion 5 is part of the Hilsea Lines, an historic defensive structure and Scheduled Ancient Monument owned by the city council. This part of the lines is unoccupied and has also been placed by Historic England on their 'At Risk' register. At present, the bastion can only be reached on foot, and this inaccessibility contributes to its poor condition and makes maintenance difficult. The bastion has deteriorated to the point where the level of investment required to sustain a new use is not commercially viable.</p> <p>A survey, funded by Historic England, has been undertaken to fully understand the issues around the repairs necessary to the structure and their costs. As a result of this the council is now:</p> <ul style="list-style-type: none"> • Working to secure a vehicular means of access to the bastion • Identify a tenant/partner that would be able to apply for funding for the necessary restoration works to the bastion <p>The work on the bastion supports wider objectives in the area to bring together as a single concept the leisure offer, ecological value, heritage value and connectivity opportunities to create a unbroken linear park along the north of the island, supporting a wider rebalancing of the visitor economy to the north of the city.</p> <p>Also involved in the scheme is Hilsea Lido, a 1930s lido site, now maintained and operated by a charitable trust. The site does not have a heritage designation but is much-loved locally and is seen to be an example of "living heritage". Progress has been made with the site but considerable investment is necessary. A previous Coastal Communities scheme was unsuccessful, but there remains an</p>

	opportunity to consider how the site can function at the heart of a redeveloped offer for the north of the city.
Objectives supported	Care for, improve and celebrate the city's historic assets; Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement
Potential outcomes	Repair of the bastion completed; future uses secured.
Lead organisation/partners	Portsmouth City Council; Historic England; Hilsea Lido Pool for the People Trust; Hampshire and Isle of Wight Wildlife Trust.
Potential sources of funding	To be confirmed - some PCC capital has been applied and the Hilsea Park concept is subject to a Levelling Up Fund bid.
Timescale	As part of wider linear park development, developments to take place up to 2021.

Project 3	Fort Cumberland
Description	Rare 18 th century 'Star Fort' scheduled monument in ownership of Historic England, and an operational site for the HE archaeology division. A masterplan started to be developed for the site exploring diversification and new/additional uses for the historic site to generate footfall and income. A bid to Coastal Communities Fund was made which was unsuccessful but attracted very positive feedback. Given the existing operation uses for the Fort, Historic England are now taking time to reflect on the future plan for the site.
Objectives supported	Care for, improve and celebrate the city's historic assets; Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement
Potential outcomes	Future uses secured - sustainability for the asset.
Lead organisation/partners	Historic England; Portsmouth City Council
Potential sources of funding	To be confirmed in line with Historic England intentions towards the site.
Timescale	

Project 4	Southsea Castle (including Southsea Lighthouse)
Description	A very prominent historic 16 th century Henrician Castle, part of the city's Museums Service portfolio and a scheduled monument. The building's current condition is considered reasonable, however the structure requires expensive ongoing maintenance. The range of uses on site has been expanded and now incorporates a restaurant, wedding venue and is home to businesses including a micro-brewery. It is well visited, particularly in the summer months, and is increasingly important as a centre for events such as the annual Reading Challenge celebration and as a showcase area during Victorious Festival or the Americas Cup events.

	<p>Parts of the site would benefit from further repair and renovation, including the tunnels and the Lighthouse. The city council has secured a grant from the Coastal Revival Fund towards this.</p> <p>There are discussions about the likely impact of the coastal defences work on the structure of the Castle, the setting and the usage; and the extent to which this could create opportunities as well as having a negative impact. There is dialogue with NLHF about possible funding support. There is also ongoing consideration of how expanding the range of uses and commercial opportunities could help secure the Castle in the long term.</p>
Objectives supported	Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement; recognise the role of the historic environment in the supporting the wider wellbeing of the city
Potential outcomes	Structure secured and increased vibrancy as a destination
Lead organisation/partners	Portsmouth City Council
Potential sources of funding	National Lottery Heritage Fund
Timescale	Bidding in 2020

Project 5	Horse Sands Fort
Description	Mid/late 19 th century Solent sea fort. Abandoned structure in a state of dereliction with difficult access. Purchased in 2012 by a property developer, and consent for residential conversion applied for. There are possible options for conversion to a museum, and in all cases, repair. Adaptation and re-use are to be encouraged, but at this point there are no firm plans for the site.
Objectives supported	Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement;
Potential outcomes	Fort condition improved and future secured
Lead organisation/partners	Tbc
Potential sources of funding	Tbc
Timescale	Tbc

Project 6	Tipner Magazine
Description	Grade II listed late Georgian powder magazines, stores and associated office buildings. The magazine is in poor condition. A major regeneration project for the whole of Tipner Point has been initiated. Repair, adaptation and reuse of the magazines within the context of the wider project is encouraged.
Objectives supported	Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement; Recognise the role of the heritage offer in positioning Portsmouth's future economic development strategy, including through the cultural offer.
Potential outcomes	Repair and potential reuse of the magazine

Lead organisation/partners	Portsmouth City Council and Tipner Development Partner (when appointed)
Potential sources of funding	Tbc - possibly through wider Tipner Regeneration (Lennox Point scheme)
Timescale	Tbc as part of wider Tipner Regeneration (Lennox Point scheme)

Project 7	Lumps Fort
Description	Grade II listed Victorian coastal fort. This asset is considered to have the opportunity for enhancement through siting of public art, new planting and footpaths - consideration is being given to reuse of building in the Rose Garden as café/tea rooms to enhance the Seafront, and this is encouraged as an appropriate usage which will give sustainability to the asset.
Objectives supported	Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement; Recognise the role of the heritage offer in positioning Portsmouth's future economic development strategy, including through the cultural offer.
Potential outcomes	Appropriate usage secured for the site; enhancement of the local area offer
Lead organisation/partners	Portsmouth City Council
Potential sources of funding	Private investment ; possible NHLF support
Timescale	TBC

Historic Naval Base

Project 8	Historic Naval Base - programme to work on a number of at risk assets
Description	<p>Block Mills - site of Marc Brunel's seminal Block Mills, a very early example of factory production and a scheduled monument. Not in use and currently in the ownership of the MoD, transfer to the Portsmouth Naval Base Property Trust is anticipated. There is the possibility of conversion to a museum as part of the wider Historic Dockyard portfolio.</p> <p>Number 6 Dock, Basin 1 - Early historic dock (c.1690) rebuilt 1737. The structure is in poor condition suffering from rotation and damage to its stonework and is listed as at risk. Transfer to Portsmouth Naval Base Property Trust is a possibility. Repair and reuse of the dock essential to securing its future.</p> <p>Old Naval Academy - Former Georgian Naval training college, a Grade II* listed building. Unoccupied for several years, despite some efforts at remediation, the building continues to suffer from a range of problems including damp and fungal attack at ground level, and water ingress through the roof. The future of the building is currently uncertain, however reuse as officer accommodation is understood to be a possibility. Further, more urgent remedial works needed to direct water away from the roof are necessary. The building is on the at risk register and repair and reuse of the building is encouraged.</p> <p>No 25 Store HMNB - Grade II* listed late 18th century storehouse. In conjunction with a number of other structures located in the working Naval Base and under MoD ownership it is unoccupied and facing an uncertain future. The condition of the building is considered reasonable, however investment in ongoing repair and maintenance and finding a viable new use for the structure are necessary. The building is on the at risk register.</p> <p>Iron and Brass Foundry - Grade II* listed mid-Victorian iron and brass foundry built to support expansion of iron navy. The principle part of the building has been converted (2003) to an office, and is occupied by BAE systems. Rear wing of the building remains unoccupied and is affected by water ingress. Repair and ongoing maintenance, and new use for the rear wing, are encouraged. The building is on the at risk register.</p> <p>2-8 Parade HMNB - 1Grade II* listed 715-1719 former lodgings for dockyard officers, converted to office use by the MoD in the mid-1990s. A number of buildings (not all) in the terrace are affected by water ingress and damp leading to rot. Repair, maintenance and new uses encouraged. On the at risk register.</p>
Objectives supported	Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement; recognise the role of the heritage offer in positioning Portsmouth's future economic development strategy, including through the cultural offer.
Potential outcomes	Appropriate usage secured for the site; enhancement of the local heritage offer in conjunction with the Historic Dockyard.

Lead organisation/partners	MoD/DIO, Portsmouth Naval Base Property Trust
Potential sources of funding	Tbc
Timescale	Tbc

Portsea

Project 9	Portsea
Description	<p>The wider Portsea area is one of the city's conservation areas and there are a number of opportunities to invest in some of the features and the interpretation to improve the heritage dimension of this area.</p> <p>The Beneficial School - A rare early charitable school (1794), now operating as a theatre and drama/theatre school. The structure (roof and windows) is in poor repair, and capital investment will be necessary. Grade II listed, at risk register.</p> <p>St George's Church - Unusual mid-17th century Georgian church (1754) built by dockyard workers. This Grade II listed building is at risk due to defects to roofs, parapets, rainwater goods, windows and bellcote. The church has developed a relationship with the local community volunteer group 'Portsmouth Men's Shed'. An application was previously made to the NLHF churches fund to grant aid repairs.</p> <p>Treadgolds - Grade II listed former ironmongers and a rare Victorian time capsule. The site is in the hands of a dedicated trust, and a range of potential uses are under consideration. Work has commenced (2015) on submission of an NLHF bid for repair, conversion and reuse. Several phases of work have been completed to date.</p> <p>Former Portsmouth Harbour Signal Box - A 1930s 'streamline modern' signal box overlooking The Hard. There are potential opportunities for reuse and adaptation and a bid has been submitted to the Network Rail community fund to support this.</p> <p>Queen Street and the Hard - The Hard is the key waterfront gateway to the city. The public realm of the Hard has been improved recently with the works to upgrade the bus interchange, and it is clear that the area north of the interchange would also benefit from new surfacing and integration with the rest of the Hard and the Historic Dockyard. Similarly, Queen Street - the historic main road linking the Hard with the city centre - would also be improved though enhanced street surfacing and higher quality integrated street furniture.</p> <p>There is a strong and vibrant community association in the area - the Portsea Action Group - who will be integral to the work that can be done in Portsea and there is potential to explore a Partnership Scheme in Conservation Areas (PSICA) project in this area.</p>
Objectives supported	Care for, improve and celebrate the city's historic assets
Potential outcomes	A vibrant local heritage story with improved condition of some key sites and improved public realm in a gateway area of the city.
Lead organisation/partners	Portsmouth City Council, Historic England, PNBPT, Network Rail, Portsea Action Group
Potential sources of funding	Tbc - bids to Historic England and Network Rail
Timescale	Ongoing - some projects already in train

Wider Cultural and Industrial Heritage

Project 10	Cultural heritage
Description	<p>St Mary's Church - A large and imposing late Victorian church in knapped flint. Past repairs to the roof and towers have been grant aided, and further investment is necessary to add repairs. Grade II* listed, on the at risk register.</p> <p>Wymering Manor - manor house with significant elements of medieval fabric. Acquired by a dedicated trust in 2013. The Trust have had some success in obtaining funding which has been invested in repairs and a project to explore possible new uses for the site. Progress is being made. Delivery of structural repair, further renovation and a new, sustainable use remain necessary. Grade II* listed, on the at risk register.</p> <p>Carnegie Library - Early 20th century Carnegie library still in use as a lending library operated by the local authority. Additional new uses are to be found for the building to ensure space used as efficiently as possible and income generated to secure its future. Grade II listed.</p> <p>Kings Theatre - one of the city's two principal Edwardian Theatres (1907) designed by noted architect Frank Matcham. The theatre is run by a dedicated trust who have developed ambitious plans for a redevelopment project which will support the sustainability of the theatre as a cultural venue and drive increased income for investment in the building. The trust are working in partnership with the local authority to bring the scheme forward, and consulting extensively with Historic England around the heritage asset. Grade II* listed.</p> <p>Eastney Beam Engine House is a Grade II -listed Victorian engine house and a scheduled monument. Dating from 1887, the Engine House contains two 150 horsepower James Watt & Co. beam engines. The pumps were built as part of a plan to improve Portsmouth's sewage system. The other element of the plan was large holding tanks which held the sewage until the pumps could empty them into the ebb tide. The Engine House is now open to the public as a museum, owned by Portsmouth City Council but largely operated by volunteers; consequently is only open on the last weekend in every month. There are significant repairs required to the building and opportunities to rethink the wider site to better showcase the heritage assets. The wider site has much potential for heritage-led regeneration.</p>
Objectives supported	Care for, improve and celebrate the city's historic assets; Recognise the role of the heritage offer in positioning Portsmouth's future economic development strategy, including through the cultural offer; Recognise the role of the historic environment in the supporting the wider wellbeing of the city.
Potential outcomes	Improved condition of assets contributing to the unique sense of the city's identity.
Lead organisation/partners	Portsmouth City Council, Kings Theatre Trust, Church of England.
Potential sources of funding	Tbc - various sources may be applicable to the specific projects.
Timescale	Various

Public Realm

Project 11	Public realm
Description	<p>Clarence Esplanade - The promenade east of Clarence Pier would benefit from enhancement with new surfacing incorporating an embedded pattern - this will be interdependent with the work on sea defences.</p> <p>Victoria Park - A Grade II listed park first opened in 1878 as 'the people's park' and has been an important part of life in the city ever since. The environment around it has changed significantly throughout its lifetime, particularly in the past few years with the development of student accommodation, a new Travelodge and the newly improved war memorial space. Further major developments will be taking place in the next few years including the University of Portsmouth's recently announced development on the former Victoria Swimming Bath's site. All of these developments mean that the park now has a rich and diverse audience of neighbours, residents, students and visitors to the city and it plays a more important role than ever before as a green space and a meeting place.</p> <p>Victoria Park is currently the subject of a £2.77m project, including from the National Lottery Heritage Fund, to revitalise the park and protect its heritage. Development work has included a conservation plan that will restore, improve, uncover and celebrate the park's heritage and create a more inclusive space, so that more people can use the park and to improve their wellbeing.</p> <p>Linked to this, the city's principal civic space - Guildhall Square and surrounding area - would benefit from de-cluttering of street furniture and the cleaning and enhancement of other townscape features to make it more appealing for activity outside of working hours.</p> <p>Southsea Common - historic waterfront park and the city's largest area of open space. A range of opportunities exist for this large and important asset. Including restoration of the historic landscaping and features, improved connections, surfacing and furniture and tree planting - a recent tree planting scheme added to the Ladies Mile. Grade II listed park.</p> <p>Conservation areas - although there are no plans to designate further conservation areas in the city, there are ongoing opportunities to consider how these can be enhanced further in terms of their appeal and function in creating the sense of identity - recent work has taken place looking at improvements that might be possible in the Castle Road area, for example. We will also work with our highways partner, Colas, to better understand and monitor works carried out in conservation areas or within the setting of designated heritage assets to ensure this is delivered sensitively.</p>
Objectives supported	Care for, improve and celebrate the city's historic assets; Recognise the role of the heritage offer in positioning Portsmouth's future

	economic development strategy, including through the cultural offer; recognise the role of the historic environment in the supporting the wider wellbeing of the city
Potential outcomes	Enhanced civic space and public realm encouraging more activity to take place
Lead organisation/partners	Portsmouth city council, NLHF, Colas
Potential sources of funding	NLHF
Timescale	Work underway from 2020 onwards

Project 12	Review/Update of Conservation Area Appraisal/Guideline documents
Description	<p>Both legislation (Sec 69 (2) of the Planning (Listed Buildings and Conservation Area) Act 1990, and Planning Practice Guidance make clear that LPAs should review their conservation areas from 'time to time'.</p> <p>Portsmouth has 22 Conservation Areas each one with an Appraisal/Guideline documents. The age and/or last review date of all of these documents, in combination with subsequent changes to national planning policy, now leaves components of them potentially quite dated. In light of this their review and update is acknowledged as desirable. This does not however concede that the current documents are in any way 'invalidated' by their age. They retain a high degree of effectiveness both as a guide to stakeholders, and as a current and ongoing tool in planning decision making.</p>
Objectives supported	Care for, improve and celebrate the city's historic assets; Identify future options for key heritage assets in the future to enable the promotion of schemes for improvement.
Potential outcomes	Enhanced civic space and public realm encouraging more activity to take place
Lead organisation/partners	Portsmouth city council
Potential sources of funding	
Timescale	Tbc

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Agenda Item 15

Treasury Management Outturn Report 2020/21

Title of meeting:	Governance and Audit and Standards Committee Cabinet City Council
Date of meeting:	Governance and Audit and Standards Committee 16 th July 2021 Cabinet 27 th July 2021 City Council 12 th October 2021
Subject:	Treasury Management Outturn Report 2020/21
Report by:	Director of Finance and Resources (Section 151 Officer)
Wards affected:	All
Key decision:	No
Full Council decision:	Yes

1. Executive Summary

The Chartered Institute of Public Finance & Accountancy's (CIPFA) Prudential Code of Practice requires local authorities to calculate prudential indicators before the start of and after each financial year. The CIPFA Code of Practice on Treasury Management also requires the Section 151 Officer to prepare an annual report on the outturn of the previous year. This information is shown in Appendix A of the report.

2. Purpose of Report

To inform members and the wider community of the Council's treasury management activities in 2020/21 and of the Council's treasury management position as at 31st March 2021.

3. Recommendations

It is recommended that the actual prudential and treasury management indicators based on the unaudited accounts, as shown in Appendix B, be noted (an explanation of the prudential and treasury management indicators is contained in Appendix C).

4. Background

The Local Government Act 2003 requires local authorities to have regard to the Chartered Institute of Public Finance and Accountancy's (CIPFA) Prudential Code for Capital Finance in Local Authorities.

5. Reasons for Recommendations

The net cost of Treasury Management activities and the risks associated with those activities have a significant effect on the Council's overall finances. Consequently, in accordance with good governance, the S.151 Officer is required to report to the Council on those activities.

6. Integrated impact assessment

An integrated impact assessment is not required, as the recommendations do not directly impact on service or policy delivery. Any changes made arising from this report would be subject to investigation in their own right.

7. Legal implications

The Section 151 Officer is required by the Local Government Act 1972 and by the Accounts and Audit Regulations 2015 to ensure that the Council's budgeting, financial management, and accounting practices meet the relevant statutory and professional requirements. Members must have regard to and be aware of the wider duties placed on the Council by various statutes governing the conduct of its financial affairs.

8. Director of Finance & Resources (Section 151 Officer) comments

All financial considerations are contained within the body of the report and the attached appendices

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Signed by Director of Finance & Revenues (Section 151 Officer)

Appendices:

Appendix A: Treasury Management Outturn Report

Appendix B: Prudential and Treasury Management Indicators

Appendix C: Explanation of Prudential and Treasury Management Indicators

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

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

<u>Title of document</u>	Location
1 Information pertaining to the treasury management outturn	Financial Services
2	

TREASURY MANAGEMENT OUTTURN REPORT**1. GOVERNANCE**

Treasury management activities were performed within the Prudential Indicators approved by the City Council.

Treasury management activities are also governed by the Treasury Management Policy Statement, Annual Minimum Revenue Provision for Debt Repayment Statement and Annual Investment Strategy approved by the City Council.

2. COMBINED BORROWING AND INVESTMENT POSITION (NET DEBT)

On 31 March 2021, the Council had gross debt including finance leases and private finance initiative (PFI) schemes of £778m and gross investments of £403m giving rise to a net debt of £375m. Major components of the Council's gross investments of £403m include the Council's general and earmarked reserves of £281m, and capital grants received but yet to be applied to finance capital expenditure of £113m.

3. BORROWING ACTIVITY

Public Works Loans Board (PWLB) rates are based on, and are determined by, gilt (UK Government bonds) yields through H.M. Treasury determining a specified margin to add to gilt yields. The main influences on gilt yields are Bank Rate, inflation expectations and movements in US treasury yields. Inflation targeting by the major central banks has been successful over the last 30 years in lowering inflation and the real equilibrium rate for central rates has fallen considerably due to the high level of borrowing by consumers. This means that central banks do not need to raise rates as much now to have a major impact on consumer spending, inflation, etc. This has pulled down the overall level of interest rates and bond yields in financial markets over the last 30 years. We have seen over the last two years, many bond yields up to 10 years in the Eurozone turn negative on expectations that the EU would struggle to get growth rates and inflation up from low levels. In addition, there has, at times, been an inversion of bond yields in the US whereby 10-year yields have fallen below shorter-term yields. In the past, this has been a precursor of a recession.

Gilt yields fell sharply from the start of 2020 and then spiked up during a financial markets melt down in March caused by the pandemic hitting western countries; this was rapidly countered by central banks flooding the markets with liquidity. Once the UK vaccination programme started making rapid progress in the new year of 2021, gilt yields and PWLB rates started rising sharply as confidence in economic recovery rebounded.

At the close of the day on 31 March 2021, all gilt yields from 1 to 5 years were between 0.19 – 0.58% while the 10-year and 25-year yields were at 1.11% and 1.59%.

HM Treasury imposed two changes to the margins over gilt yields for PWLB rates in 2019/20 without any prior warning. The first took place on 9th October 2019, adding an additional 1% margin over gilts to all PWLB period rates. That increase was then, reversed for Housing Revenue Account (HRA) borrowing on 11th March 2020, but not for mainstream non-HRA capital schemes. A consultation was then held with local authorities and on 25th November 2020, the Chancellor announced the conclusion to the review of margins over gilt yields for PWLB rates; the margins were reduced by 1% for General Fund borrowing. Following this later change, PWLB rates for both the HRA and the General Fund had a margin of 0.8% over gilts. At the same time, a prohibition was introduced to deny access to borrowing from the PWLB for any local authority that had the purchase of assets for yield in its three-year capital programme.

There is likely to be only a gentle rise in gilt yields and PWLB rates over the next three years. Our treasury management advisors, Link, do not forecast a rise in Bank Rate from 0.10% until March 2024 as the Bank of England has clearly stated that it will not raise rates until inflation is sustainably above its target of 2%; this sets a high bar for Bank Rate to start rising.

£60m was borrowed from the PWLB at the HRA certainty rate in the first quarter of 2020/21 to fund the HRA capital programme. This was because PWLB rates were very low and because the Council may not have been able to access funding from the PWLB in future because of its commercial activities. These loans were all for £20m and are repayable in 50 years at maturity. These loans have an average interest rate of 1.17%.

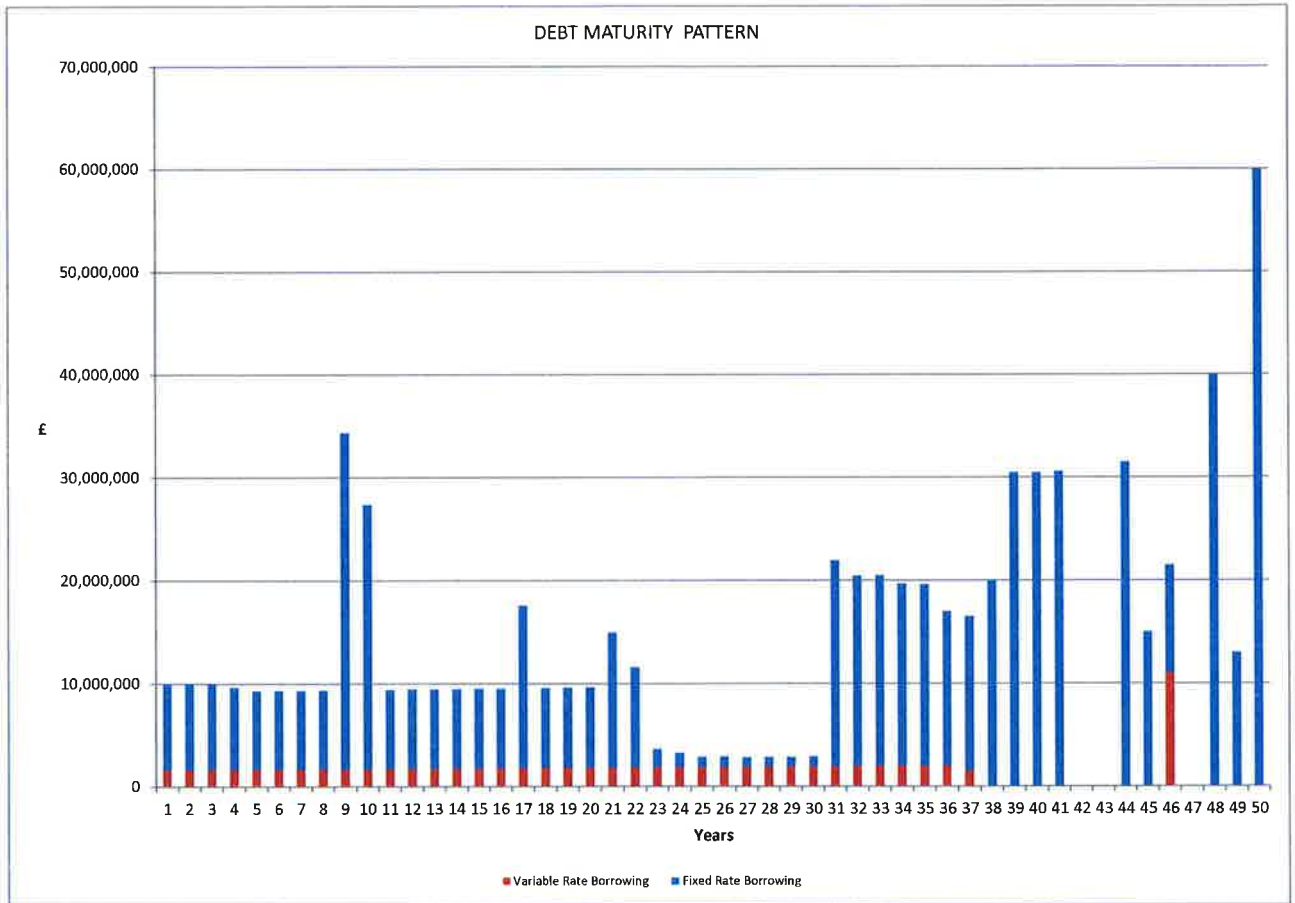
£30m was borrowed in March 2020 for an average of 50 days at 0.84% in order to fund the payment of 3 years of employer's pension contributions in advance in return for a discount. This expenditure was opportunistic (and not known sufficiently in advance) and insufficient investments matured before this large single payment had to be made. This borrowing was repaid in April 2020.

The Council's underlying need to borrow at 31st March 2021 was £825m, £47m in excess of its actual gross debt of £778m. This shortfall of £47m is funded by internal borrowing from the Council's reserves and will need to be borrowed externally at some point in the future.

Debt rescheduling opportunities have been limited in the current economic climate and following the various increases in the margins added to gilt yields, which has affected PWLB new borrowing rates since October 2010. No debt rescheduling was undertaken during 2020/21.

The Council's gross debt at 31st March 2021 of £778m is within the Council's authorised limit (the maximum amount of borrowing permitted by the Council) of £864m and the Council's operational boundary (the maximum amount of borrowing that is expected) of £846m. The Council aims to have a reasonably even maturity profile so that the Council does not have to replace a large amount of borrowing in any particular year when interest rates might be high. The maturity profile of the Council's borrowing (see graph below) is within the limits contained in the Council's Treasury Management Policy.

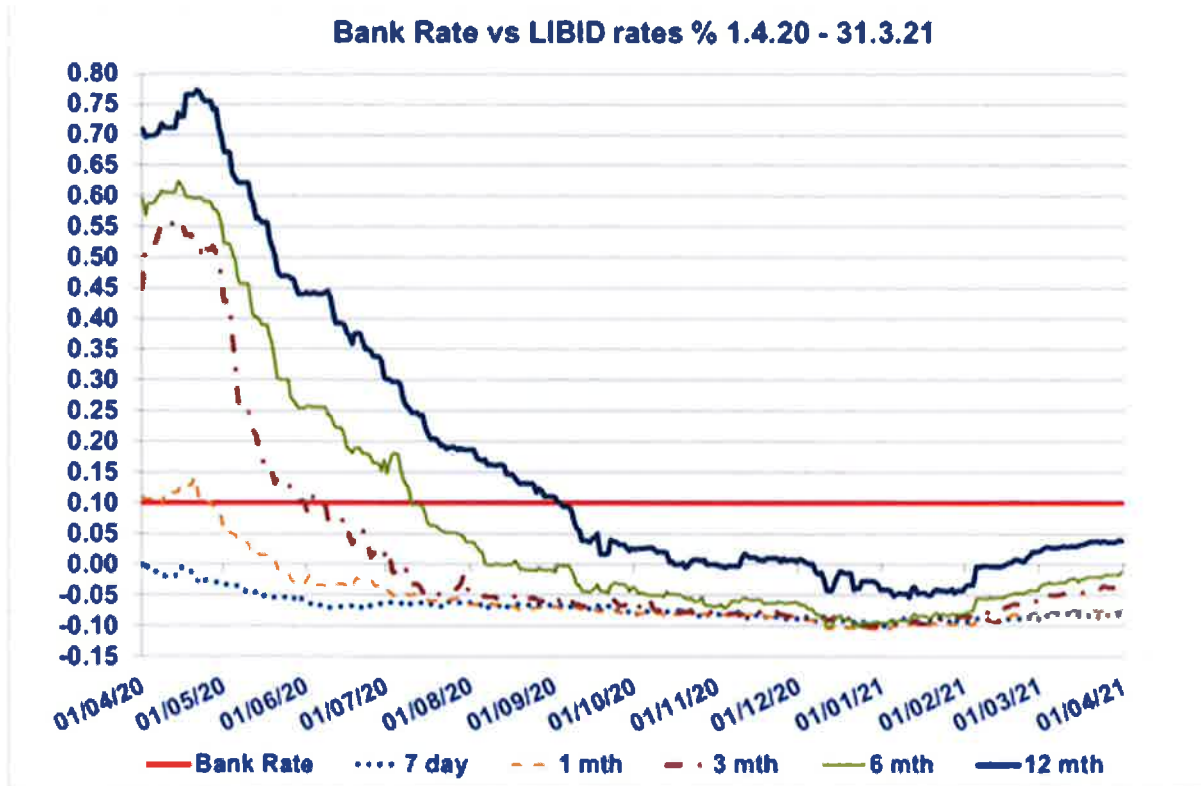
Treasury Management Outturn Report 2020/21



4. INVESTMENT ACTIVITY

When the coronavirus outbreak hit the UK in February/March 2020, rates initially plunged but then rose sharply back up again due to a shortage of liquidity in financial markets.

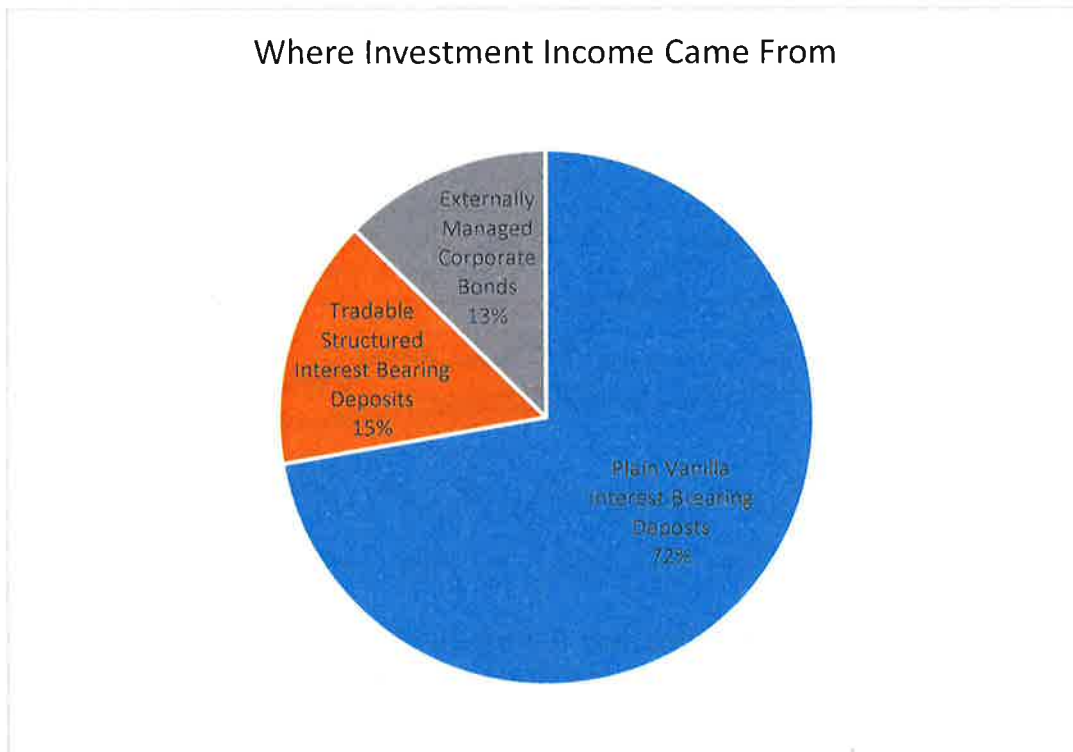
Bank Rate and market investment rates (London Interbank Bid (LIBID)) investment rates for 2020/21 are shown below.



Investment returns, which had been low during 2019/20, fell during 2020/21 to near zero or even below zero. The Council managed to avoid lending at negative rates and one feature of the year was the growth of inter local authority lending. The advent of the Covid-19 pandemic in March 2020 caused the Monetary Policy Committee of the Bank of England to cut Bank Rate in March, first to 0.25% and then to 0.10%, in order to counter the hugely negative impact of the national lockdown on large parts of the economy. The Bank of England and the Government also introduced new programmes of supplying the banking system and the economy with large amounts of cheap credit so that banks could help businesses to get through the lockdown. The Government also supplied huge amounts of finance to local authorities to pass on to businesses. This meant that for most of the year there was much more liquidity in financial markets than there was demand to borrow, with the consequent effect that investment earnings rates plummeted.

The Council's investments averaged £426.4m during 2020/21. As at 31st March 2021 the Council had, £402.7m invested. 4% of the investment portfolio was invested in tradable structured interest bearing deposits where the interest rate or the maturity date is determined by certain criteria, 2% of the portfolio was invested in externally managed corporate bonds, and the remaining 94% of the portfolio was invested in plain vanilla interest bearing deposits. These made returns of 6.06%, 7.23%, and 0.75% respectively.

The Council made an overall return of 0.99% on its cash investments in 2020/21. The chart below shows the source of the Council's cash investment income.



28% of the Council's investment income came from externally managed corporate bonds and tradable structured interest bearing deposits, despite these investments making up only 6% of the investment portfolio. However, much of these gains result from a bounce back in the market value of these investments from the low point of quarter 4 of 2019/20 when the Covid-19 pandemic struck.

The overall return on the Council's investments of 0.99% is well above the current 3-month London Inter Bank Bid (LIBID) benchmark rate of 0.02%.

5. REVENUE COSTS OF TREASURY MANAGEMENT ACTIVITIES IN 2020/21

Expenditure on treasury management activities in both the General Fund and the HRA against the revised budget is shown below.

	Revised Estimate 2020/21 £000	Actual 2020/21 £000	Variance +/- £000
Interest Payable:			
PWLB	20,043	20,043	-
Other Long Term Loans	1,207	1,192	(15)
Temporary Loans	35	17	(18)
HCC Transferred Debt	295	295	-
Interest on Finance Lease	191	191	-
Interest on Service Concession Arrangements (including PFIs)	5,669	5,669	-
Interest Payable to External Organisations	10	-	(10)
Premiums and Discounts on Early Redemption of Debt	99	53	(46)
	27,549	27,460	(89)
<u>Deduct</u>			
Investment Income:			
Interest on Investments	(4,206)	(4,048)	158
Other interest receivable	(1,386)	(1,374)	12
	21,957	22,038	81
Provision for Repayment of Debt	9,624	9,670	46
Debt Management Costs	375	410	35
	31,956	32,118	162

Net treasury management costs were £162,000, or 0.5% above the revised budget. There were a number of reasons for this, of which by far the largest is a shortfall in interest on investments. This shortfall occurred because a number of existing investments matured, with new replacement investments earning a little less than anticipated.

PRUDENTIAL AND TREASURY MANAGEMENT INDICATORS

1. Capital financing requirement	Original Estimate	Revised Estimate	Actual
	£'000	£'000	£'000
General Fund	678,951	645,232	627,485
Housing Revenue Account (HRA)	189,155	200,286	197,651
Total	868,106	845,518	825,136

2. Authorised Limit	Original Limit	Revised Limit	Actual
	£'000	£'000	£'000
Long Term Borrowing	825,730	806,363	721,303
Other Long Term Liabilities	57,151	57,151	57,159
Total	882,881	863,514	778,462

3. Operational Boundary	Original Limit	Revised Limit	Actual
	£'000	£'000	£'000
Long Term Borrowing	810,955	788,367	721,303
Other Long Term Liabilities	57,151	57,151	57,159
Total	868,106	845,518	778,462

4. Ratio of financing costs to net revenue stream	Original Estimate	Revised Estimate	Actual
General Fund	16.3%	12.2%	13.7%
Housing Revenue Account (HRA)	7.9%	6.6%	6.2%

5. Maturity Structure of Fixed Rate Borrowing	Lower Limit	Upper Limit	Actual
Under 12 months	0%	10%	1%
12 months and within 24 months	0%	10%	1%
24 months and within 5 years	0%	10%	4%
5 years and within 10 years	0%	20%	13%
10 years and within 20 years	0%	30%	13%
20 years and within 30 years	0%	40%	5%
30 years and within 40 years	0%	40%	32%
Over 40 years	0%	50%	31%

6. Maturity Structure of Variable Rate Borrowing	Lower Limit	Upper Limit	Actual
Under 12 months	0%	10%	2%
12 months and within 24 months	0%	10%	2%
24 months and within 5 years	0%	10%	6%
5 years and within 10 years	0%	20%	11%
10 years and within 20 years	0%	30%	23%
20 years and within 30 years	0%	40%	25%
30 years and within 40 years	0%	40%	17%
Over 40 years	0%	40%	14%

7. Principal sums invested over 365 days	Original Limit	Revised Limit	Actual
	£'000	£'000	£'000
Maturing after 31/3/2022	117,000	200,000	45,000
Maturing after 31/3/2023	50,000	134,000	25,000
Maturing after 31/3/2024	-	103,000	-

PRUDENTIAL AND TREASURY MANAGEMENT INDICATORS**1. ACTUAL CAPITAL FINANCING REQUIREMENT**

This represents the underlying requirement to borrow for capital expenditure. It takes the total value of the City Council's fixed assets and determines the amount that has yet to be repaid or provided for within the Council's accounts.

The capital financing requirement is increased each year by any new borrowing and reduced by any provision for the repayment of debt. Broadly, the higher the capital financing requirement, the higher the amount that is required to be set aside for the repayment of debt in the following year.

2. AUTHORISED LIMIT

The authorised limit for external debt is the maximum amount of debt which the authority may legally have outstanding at any time. The authorised limit includes headroom to enable the Council to take advantage of unexpected movements in interest rates and to accommodate any short-term debt or unusual cash movements that could arise during the year.

3. OPERATIONAL BOUNDARY

The Operational Boundary is based on the probable external debt during the course of the year. It is not a limit, but acts as a warning mechanism to prevent the authorised limit (above) being breached.

4. RATIO OF FINANCING COSTS TO NET REVENUE STREAM 2020/21

This ratio reflects the annual cost of financing net debt as a proportion of the total revenue financing received. It therefore represents the proportion of the City Council's expenditure that is largely fixed and committed to repaying debt. The higher the ratio, the lower the flexibility there is to shift resources to priority areas and/or reduce expenditure to meet funding shortfalls.

For the General Fund, this is the annual cost of financing debt as a proportion of total income received from General Government Grants, Non Domestic Rates and Council Tax.

The ratio of Housing Revenue Account (HRA) financing costs to net revenue stream is the annual cost of financing capital expenditure, as a proportion of total gross income received including housing rents and charges.

5. MATURITY STRUCTURE OF FIXED RATE BORROWING

The Council aims to have a reasonably even debt maturity profile so that it is not unduly exposed to refinancing risk in any particular year when interest rates may be high. The maturity structure of fixed rate borrowing matters less in future years as inflation will reduce the real value of the sums to be repaid.

6. MATURITY STRUCTURE OF VARIABLE RATE BORROWING

Variable rate borrowing could expose the Council to budgetary pressure if the interest rates increase. The maturity structure of variable rate borrowing matters less in future years as inflation will reduce the real value of the liability.

7. PRINCIPAL SUMS INVESTED FOR OVER 365 DAYS

Investing long term at fixed rates provides certainty of income and reduces the risk of interest rates falling.