



Portsmouth  
CITY COUNCIL

# 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 (NO<sub>2</sub>) 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 issues<sup>1</sup>.
- 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.

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<sup>1</sup> 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 <sup>2</sup>	Description / Document	Date	
<b>Preparation</b> ( <b>'Reg. 18'</b> )	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
<b>Publication</b> ( <b>'Reg. 19'</b> )	The 'final draft' of the Plan that the Council intend to submit to for Examination, published for consultation.	<b>Winter 2021</b>	
<b>Submission</b> ( <b>'Reg. 22'</b> )	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.	<b>Spring 2022</b>	
<b>Examination hearings</b> ( <b>'Reg. 24'</b> )	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.	<b>tbc</b>	
<b>Inspectors report ('Reg. 25')</b>	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.	<b>tbc</b>	
<b>Adoption</b> ( <b>'Reg. 26'</b> )	Formal adoption of the plan by the council	<b>End of 2022</b>	

- 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 documents<sup>3</sup> 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.

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

<sup>3</sup> 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 19<sup>th</sup> 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 2019<sup>4</sup>). 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 homes<sup>5</sup>).
- i.iii.iv One of the most significant changes for planning in Portsmouth was an amendment<sup>6</sup> 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

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<sup>4</sup>PCC (2021) *Local Transport Plan 4*

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

<sup>6</sup> *The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020*

considered to be largely 'town centre uses' (Commercial, Business and Service Uses<sup>7</sup>) to be interchangeable, without the need for planning permission. This is accompanied by a new F Class for Local Community<sup>8</sup> and Learning<sup>9</sup> 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*<sup>10</sup> 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*<sup>11</sup>, 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 1<sup>st</sup> January 2021, marking the end of the free movement of people and goods and services between the UK and the EU.

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

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

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

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

<sup>11</sup> 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

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By post:

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

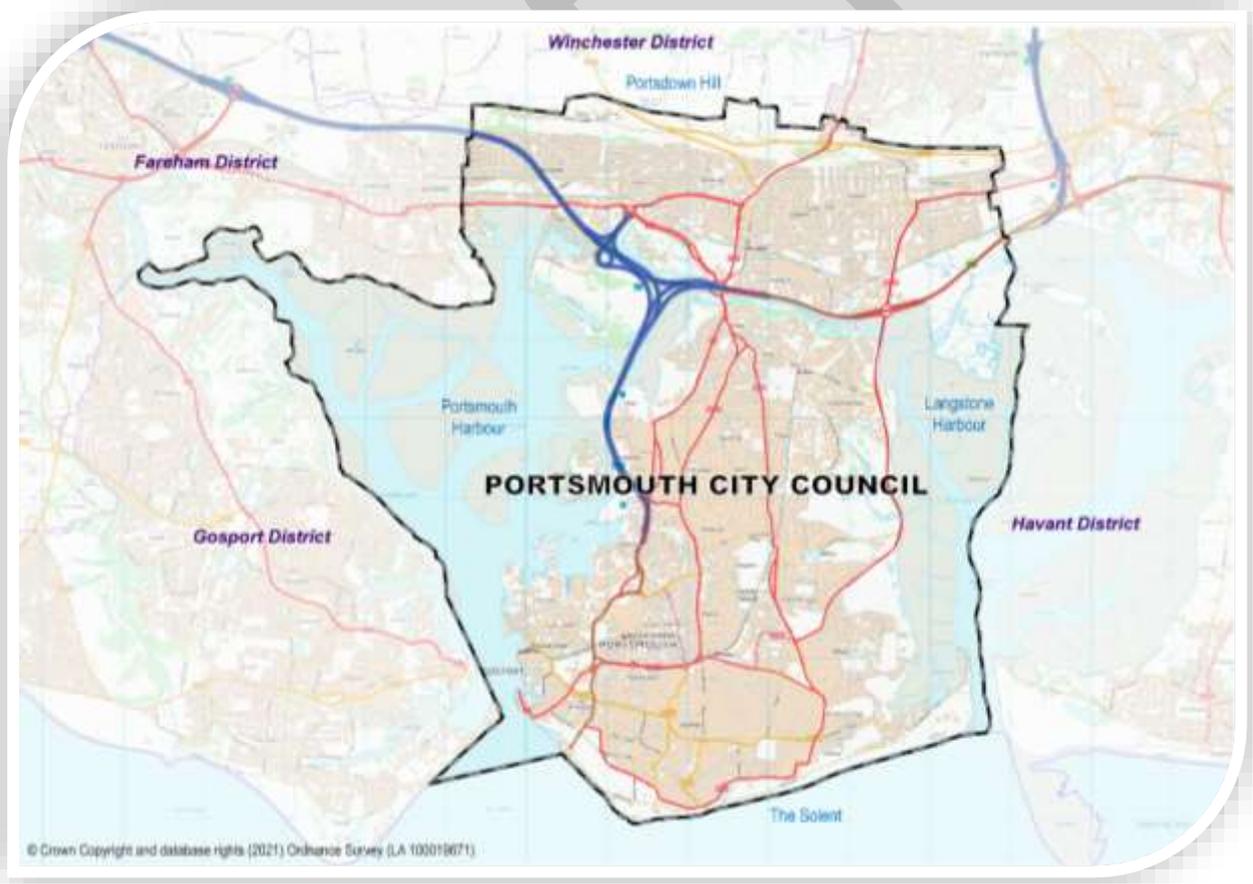
# 1 - Portsmouth's Strategic Development Strategy

## 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 associations<sup>12</sup>, 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.

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<sup>12</sup> 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 20<sup>th</sup> 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 authorities<sup>13</sup> 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'<sup>14</sup> 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.

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<sup>13</sup> 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.

<sup>14</sup> 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

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

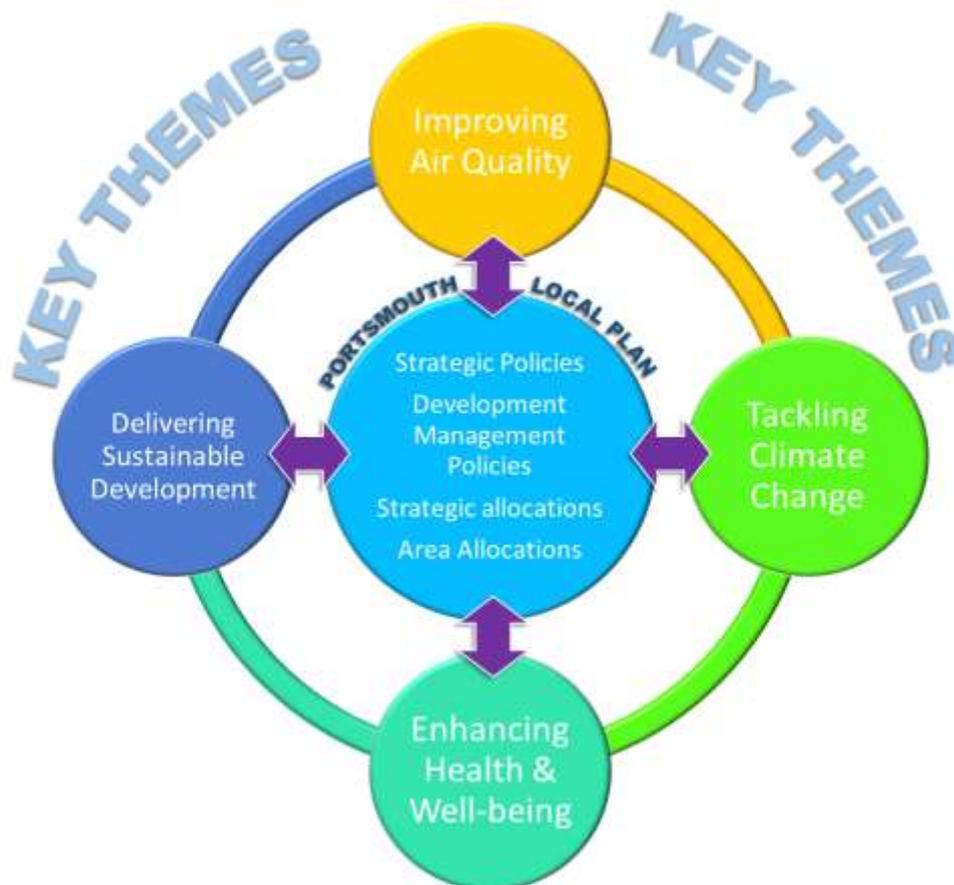
## Local Plan Key themes

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 land<sup>15</sup> 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.

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<sup>15</sup> 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 effective<sup>16</sup>.
- 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.

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<sup>16</sup> *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 time<sup>17</sup>. 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 years<sup>18</sup> 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-

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<sup>17</sup>Any significant change could necessitate early review of the policy.

<sup>18</sup> 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)*<sup>19</sup> 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.

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<sup>19</sup> 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 discount<sup>20</sup></i>		-1,616
<b>Total housing delivery 2020-2038</b>		<b>16,953</b>
<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 Portsmouth<sup>21</sup>. 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.

<sup>20</sup> Applicable to Non-strategic sites and City Centre Strategic sites

<sup>21</sup> 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>
<b>Total housing need</b> (inc. delivery buffer)	<b>17,701</b>
<b>Portsmouth's estimated housing delivery<sup>22</sup></b> (inc. under delivery discount)	<b>16,953</b>
<i>Possible Duty to Co-operate contribution</i>	<i>1,000</i>

<sup>22</sup> See Table 2: Housing Supply 2020-2038 for details

## DRAFT STRATEGIC POLICY H1: HOUSING NEED AND SUPPLY

- 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 supply<sup>23</sup> from 2020 - 2038.

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

<sup>23</sup> 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)<sup>24</sup>, 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.

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<sup>24</sup> 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)<sup>25</sup>. 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.<sup>26</sup>
- 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'<sup>27</sup>,

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

<sup>26</sup> Where this considered to constitute residential (Use Class C3) dwellings.

<sup>27</sup> 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 required<sup>28</sup>.

- 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.<sup>29</sup>
- 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.

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

<sup>29</sup> 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 delivery<sup>30</sup>, 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.

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<sup>30</sup> 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"> <li>- Proportion of developments meeting policy requirements for family housing and affordable housing.</li> <li>- Number of specialist and supported housing, older persons housing and student accommodation units delivered.</li> <li>- Delivery of self-build and custom-build plots.</li> </ul>

### 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?

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## 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'.<sup>31</sup>

### **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

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<sup>31</sup> 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**

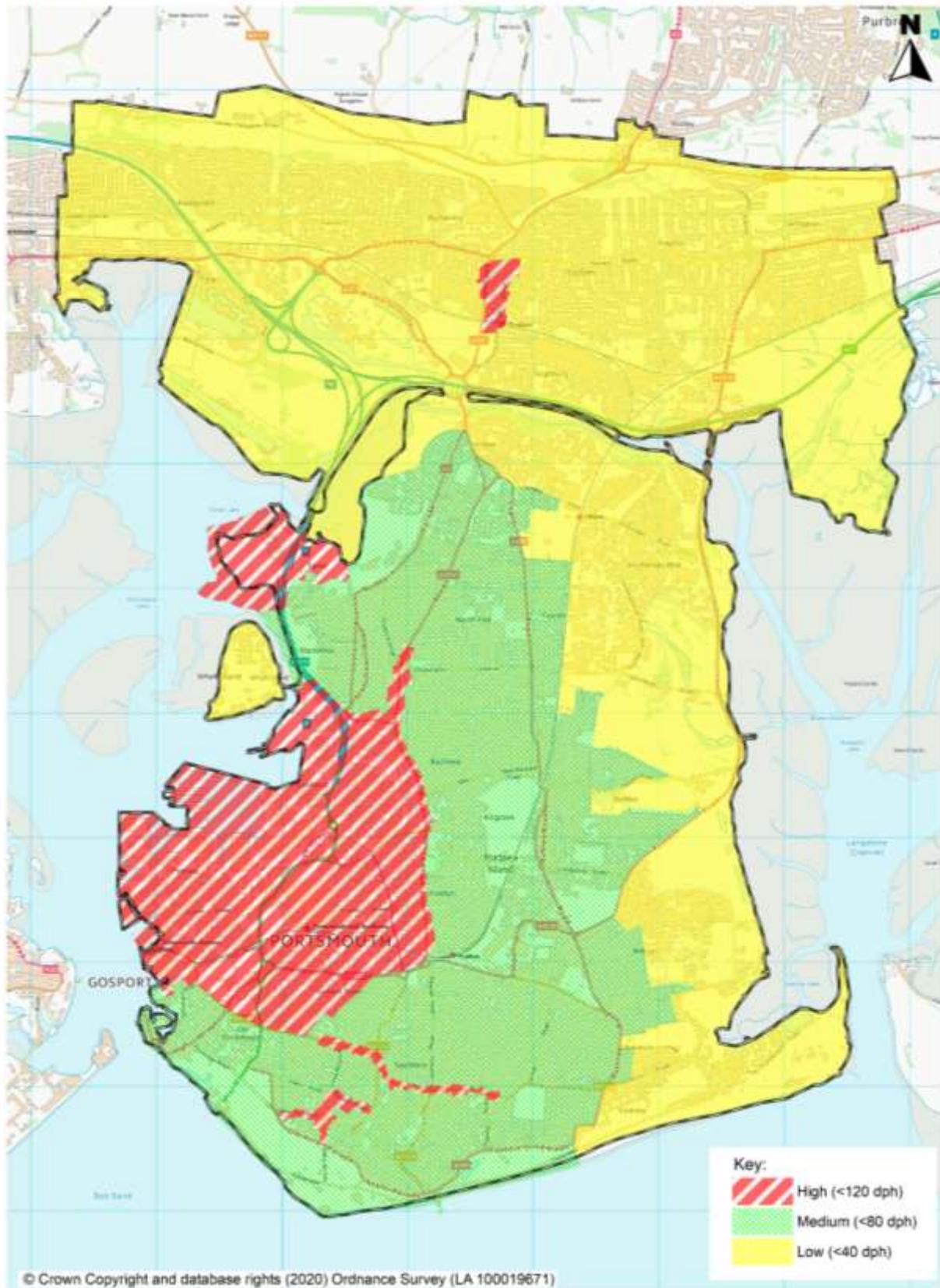
- 2.5.5 In order to achieve the uplift of prevailing densities required, an understanding is needed of the range of existing housing densities within the city. The *Urban Characterisation Study* (2011) divides the city into a number of character areas with an indicative, average density. The majority 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 <sup>32</sup> 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

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<sup>32</sup> 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 country<sup>33</sup>. 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).

<sup>33</sup> 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-occupied<sup>34</sup> 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% respectively<sup>35</sup>). 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%).<sup>36</sup>

### **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*.

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<sup>34</sup> 94.5% occupancy rate in the city's industrial units in September 2018.

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

<sup>36</sup> 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*<sup>37</sup> 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.

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<sup>37</sup> 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

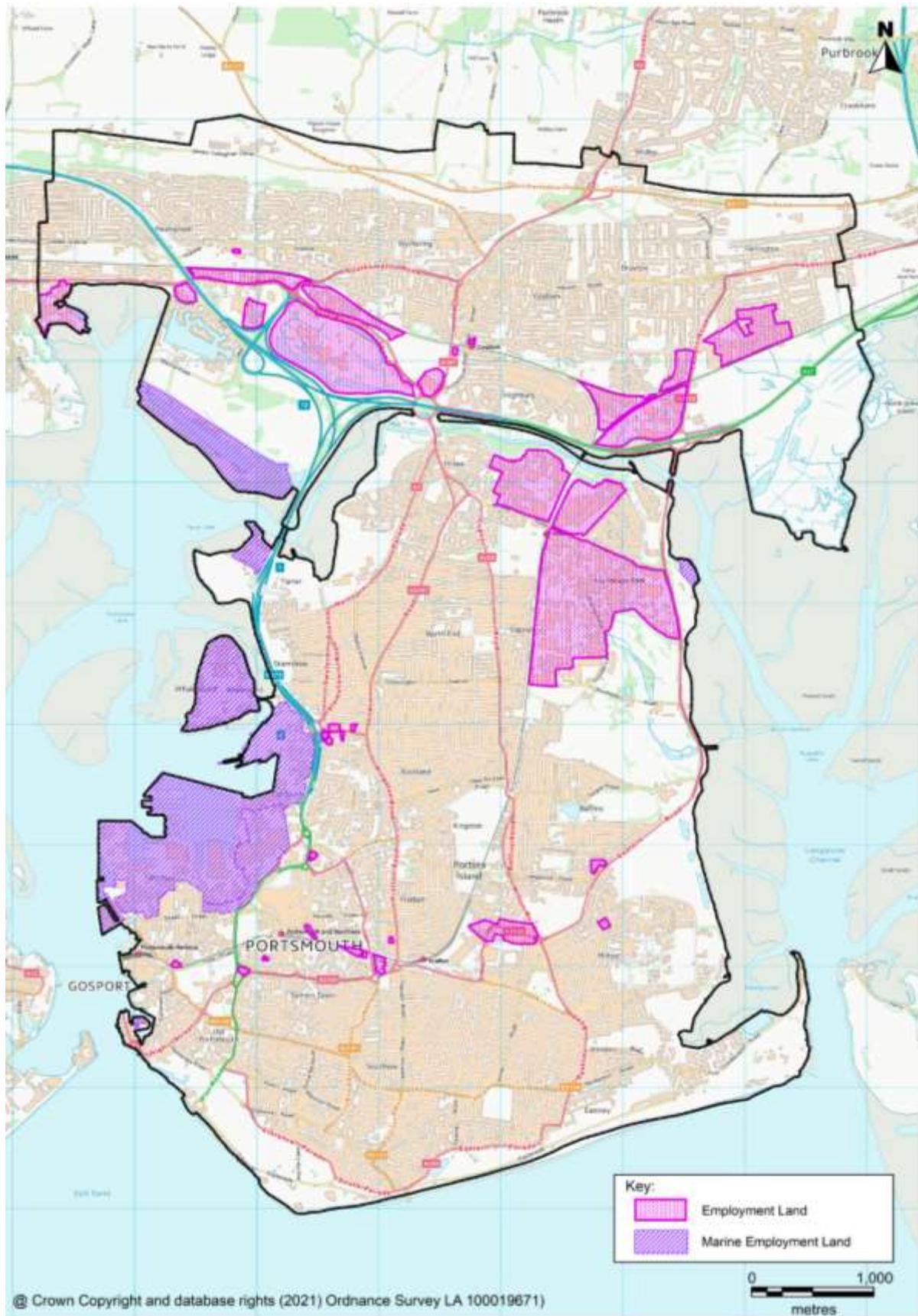
- Hampshire County Council economic and business intelligence data: <https://www.hants.gov.uk/business/ebis/reports>
- PCC *Economic Development and Regeneration Strategy (2019-36)*
- PCC *Achieving Employment and Skills Plan SPD (2014)*: <https://www.portsmouth.gov.uk/services/development-and-planning/supplementary-planning-documents/achieving-employment-and-skills-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 possible<sup>38</sup>. 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

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<sup>38</sup> 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 NPPF<sup>39</sup> 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 spending<sup>40</sup>. 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 land<sup>41</sup> / 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

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<sup>39</sup> MHCLG (2021) *Draft NPPF for Consultation*, para. 53.

<sup>40</sup> CEBR (2019) *Impact of the Maritime Sector*

<sup>41</sup> 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 data<sup>42</sup> 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 authorities<sup>43</sup> 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

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

<sup>43</sup> 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 <sup>44</sup>		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
<b>Total</b>		<b>102,524</b>	<b>88,321</b>	<b>190,845</b>
<i>- of which is identified as marine employment land:</i>		-	60,000	60,000
<b>Total non-marine employment land</b>		<b>102,524</b>	<b>28,321</b>	<b>130,845</b>

## 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><b>1. City Centre</b> 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><b>2. Lakeside North Harbour</b> 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><b>3. Tipner West and Horsea Island</b> 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 uses<sup>45</sup>. 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><b>4. Portsmouth Town Centres and Cosham Site Allocation</b> 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><b>5. Existing employment land</b> (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><b>6. Portsmouth International Port</b></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><b>7. HM Naval Base land</b></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><b>8. The Camber Docks (BAR Headquarters)</b></p>	
<p><b>9. Kendalls Wharf</b></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 uses<sup>46</sup> 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"> <li>➤ 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.</li> </ul>	<ul style="list-style-type: none"> <li>- Annual monitoring of employment floorspace gains and losses from planning applications, and the cumulative net floorspace figure for the plan period.</li> <li>- Planning applications refused in accordance with Policy E2 due to loss of employment land.</li> </ul>
<ul style="list-style-type: none"> <li>➤ To deliver new employment uses at the key employment locations (Sites 1-5).</li> <li>➤ The protection of strategic marine employment locations (Sites 3 &amp; 6-10)</li> </ul>	<ul style="list-style-type: none"> <li>- The delivery, quantity and type of proposals permitted at the identified key employment sites.</li> </ul>

**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*

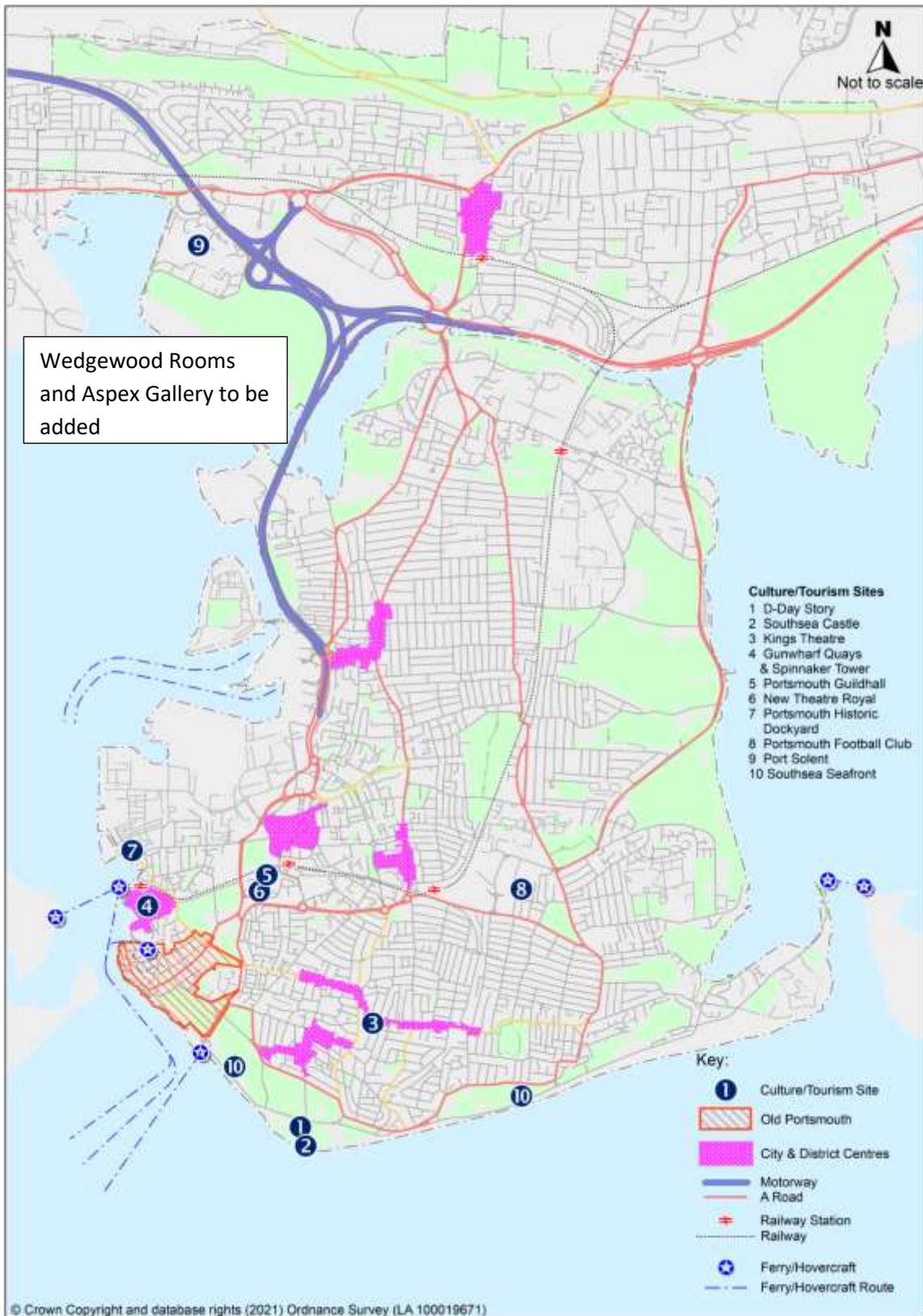
**Question 12 - Employment land**

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

<sup>46</sup> 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 Dockyard<sup>47</sup> 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.<sup>48</sup> Tourism is also crucial to Portsmouth's economy; Portsmouth welcomes around 9.3 million visitors per year,

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<sup>47</sup> Including the Portsmouth Historic Dockyard attractions in Gosport

<sup>48</sup> 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 craft<sup>49</sup> 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 facilities<sup>50</sup> 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

<sup>49</sup> Landing craft LCT7074

<sup>50</sup> 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, research<sup>51</sup> 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

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<sup>51</sup> 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 (approx. 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 E<sup>52</sup> 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 permission<sup>53</sup>). 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?

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

<sup>53</sup>Physical 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'<sup>54</sup> (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 2020<sup>55</sup> 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 permission<sup>56</sup>.

### **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.

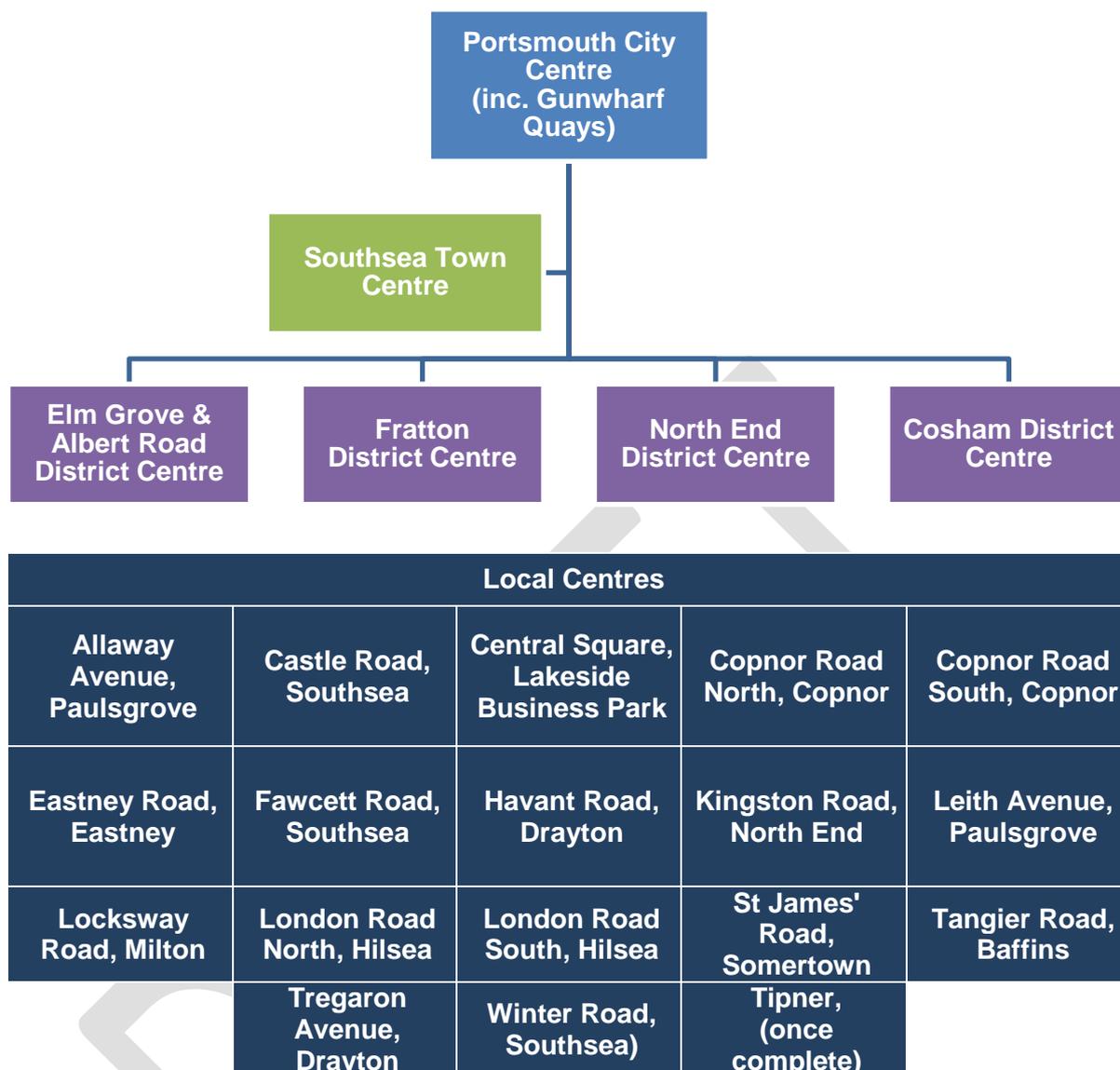
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<sup>54</sup> 'Main town centre uses' as defined in the glossary of the *National Planning Policy Framework*

<sup>55</sup> See section for i.iii for further details.

<sup>56</sup> 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 280m<sup>57</sup>, 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

<sup>57</sup> 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*

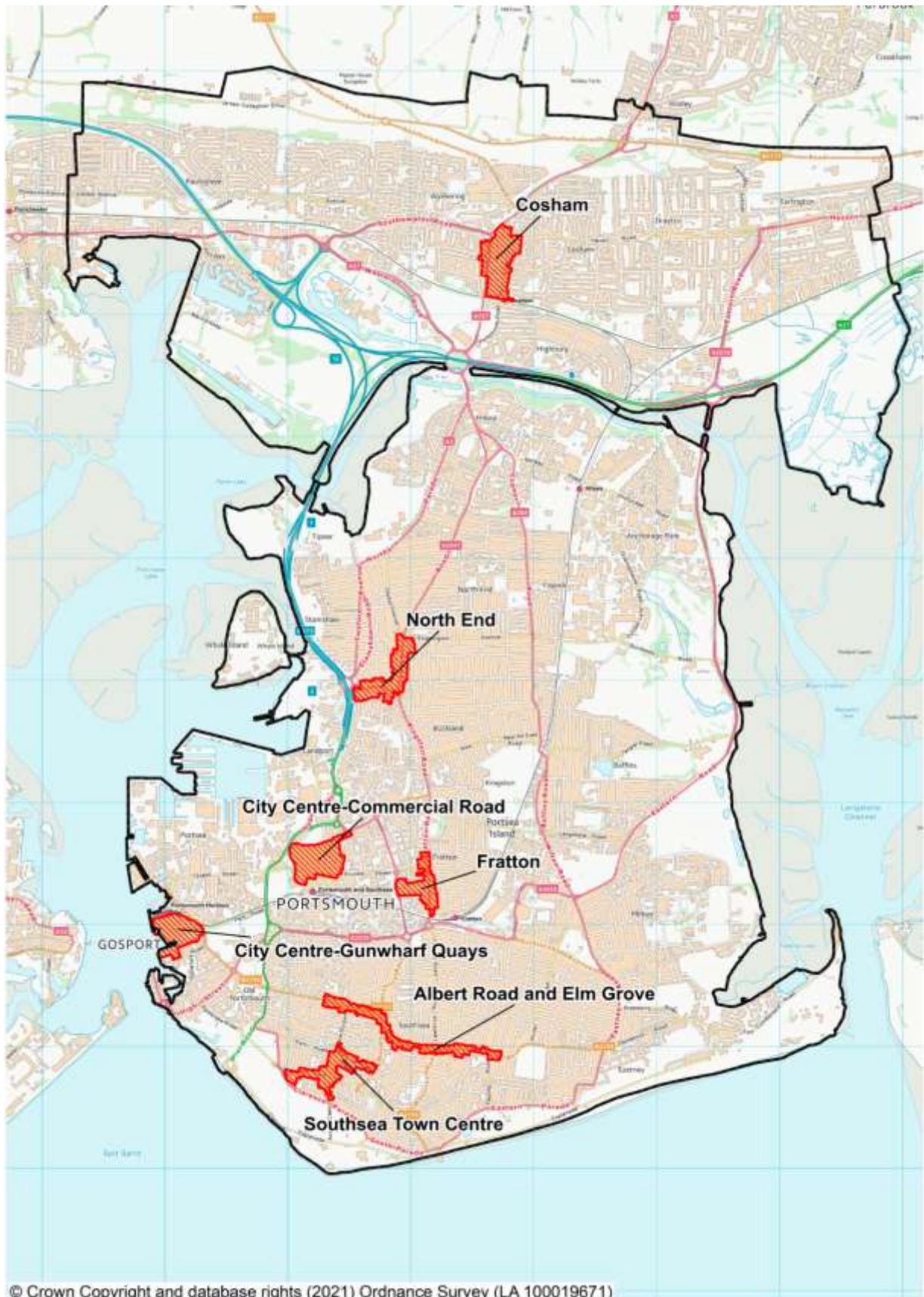
**Question 15 - Supporting Town Centres**

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

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### 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-being<sup>58</sup>.

### **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.

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<sup>58</sup> PCC (2021) *Health and Well-being background paper*

## City Centre (Commercial Road and Gunwharf Quays)

Figure 9-City Centre - Commercial Road

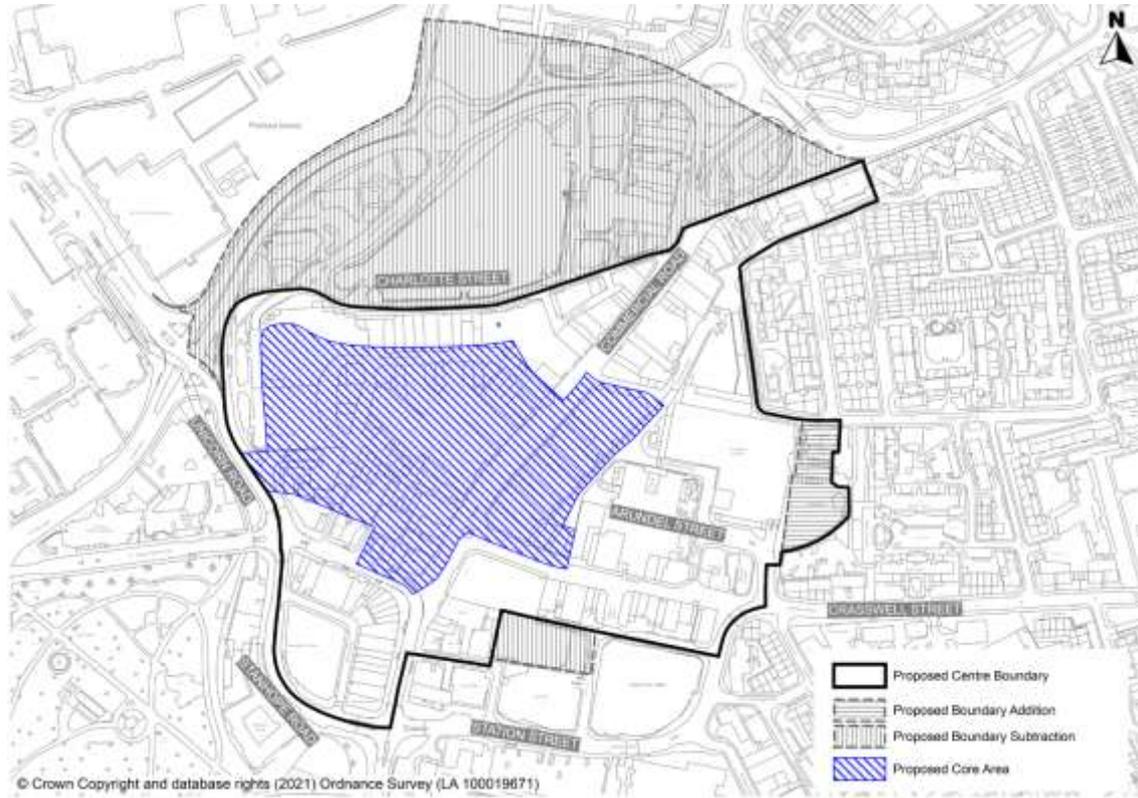
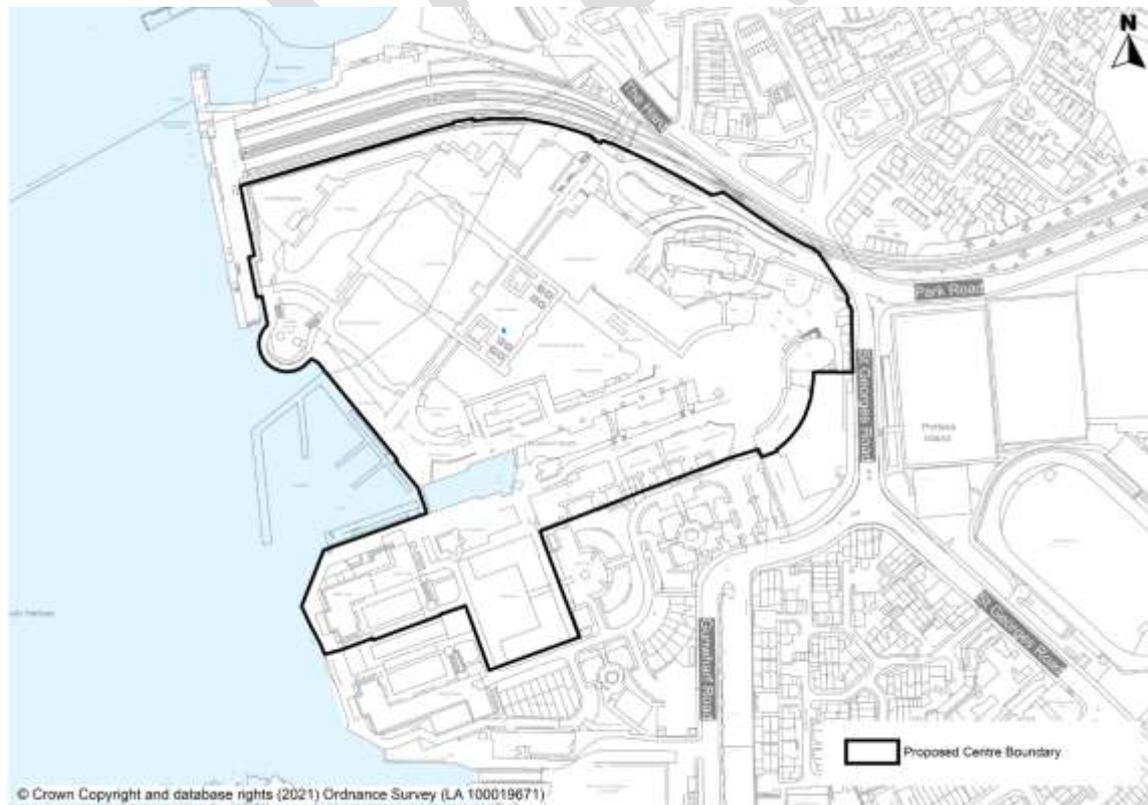


Figure 10-City Centre - Gunwharf Quays



- 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*.

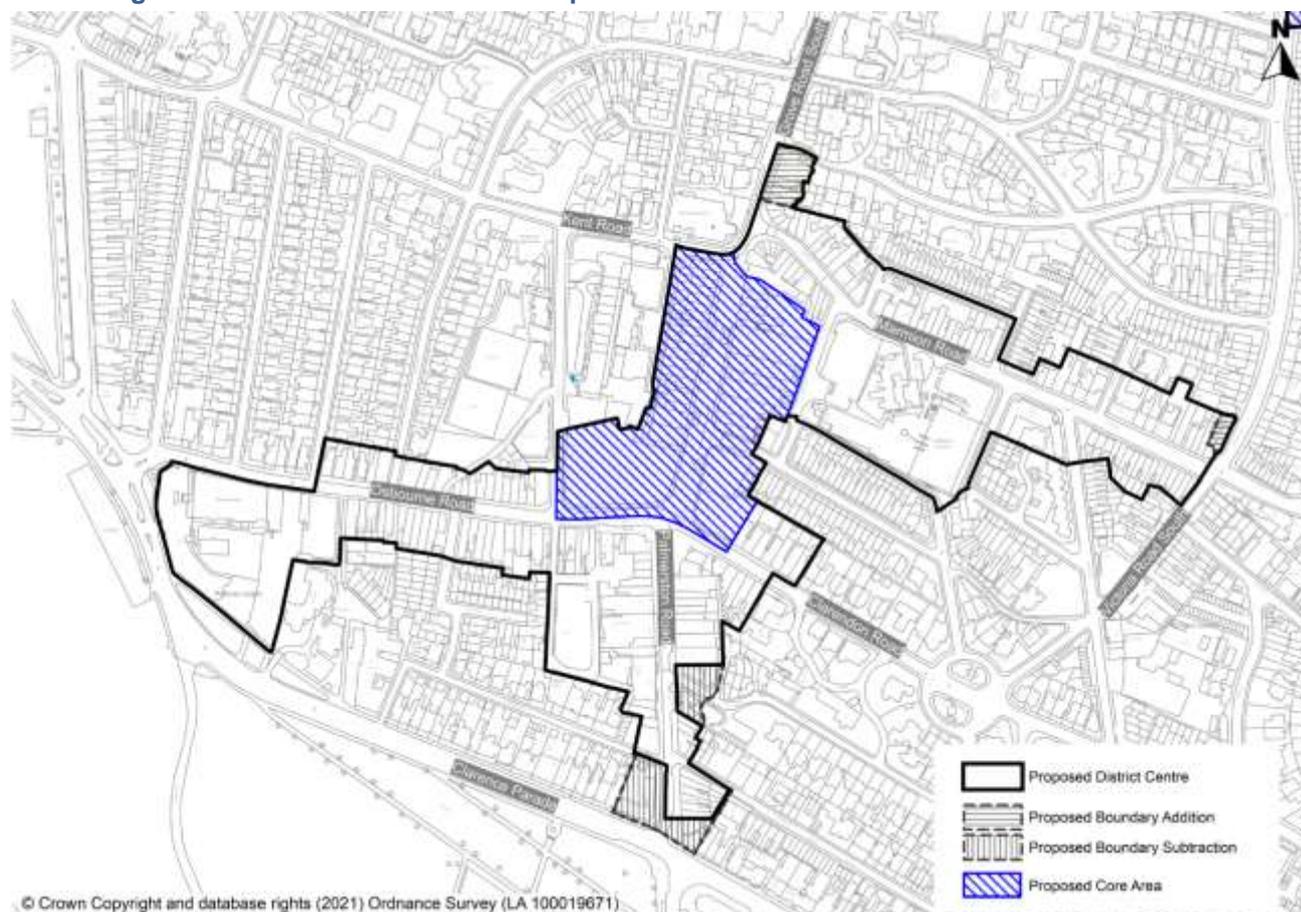
#### **Proposed Centre Strategy and Vision**

- 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**

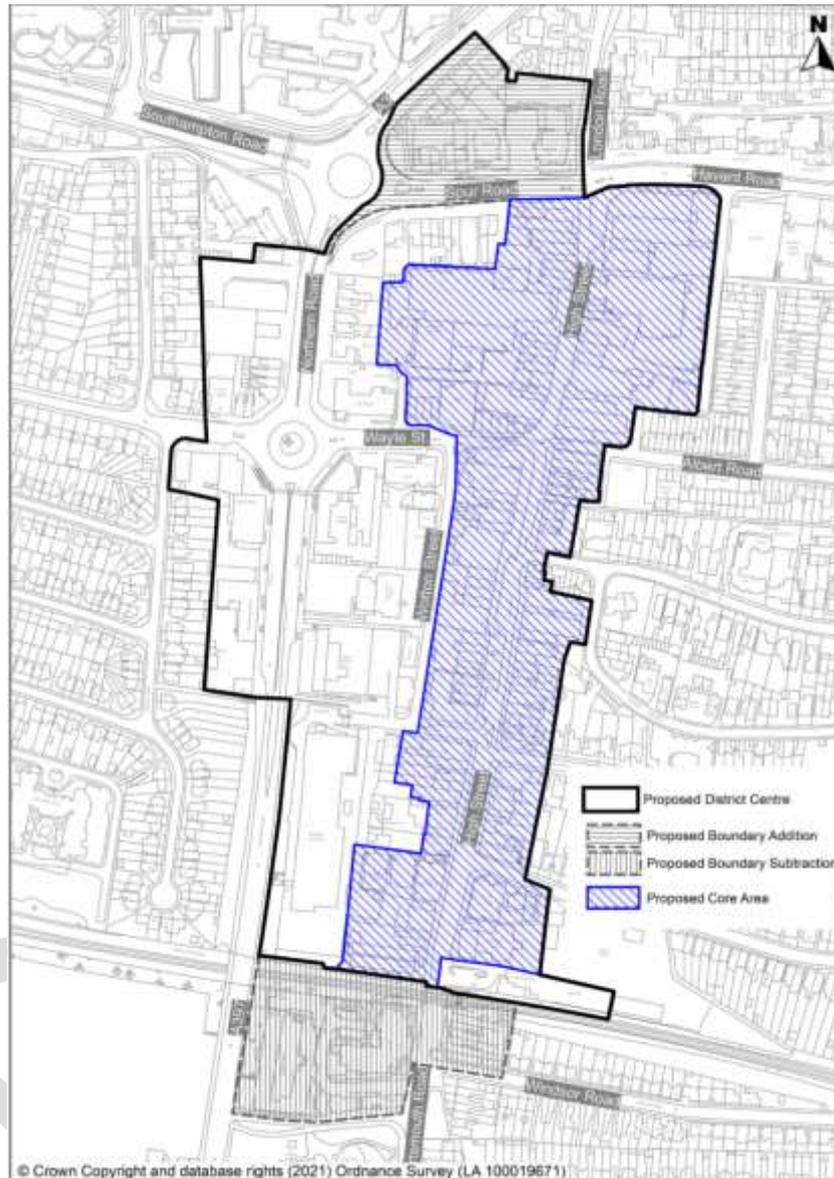
- 3.6.17 The Council will seek to retain and enhance the centre's appeal as a visitor destination, continuing to protect local amenity. Although there is a need to ensure there is a diverse mix of uses overall, the centre's food offer (currently led by seasonal markets, the restaurant/ cafe quarter) 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**

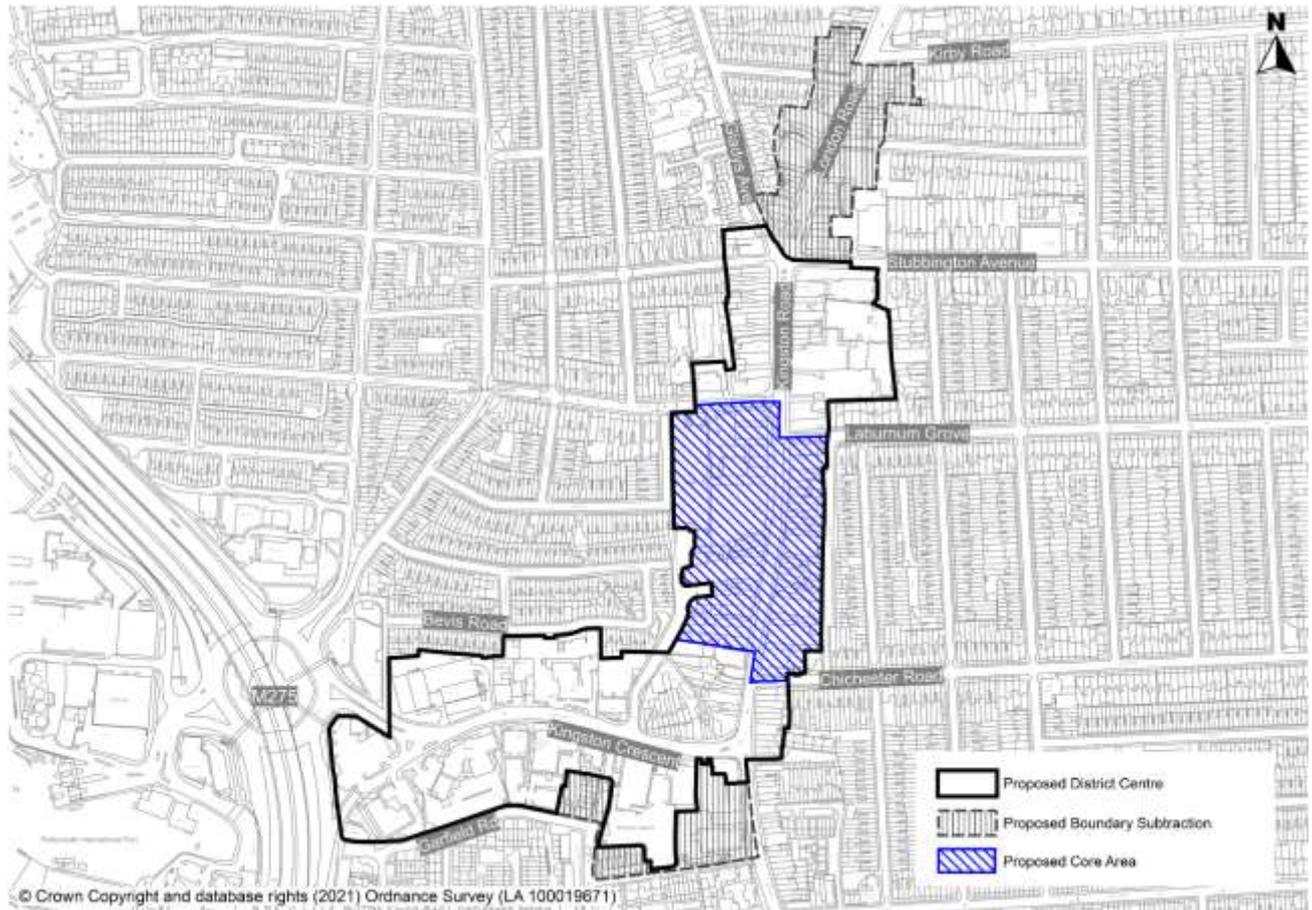
- 3.6.24 A strategy for the future of the centre should focus on providing a quality mix of retail and town centre uses, improving the environmental and visual quality of the centre and improved integration with the local area. Development in the centre should strive to maximise sustainable transport 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**

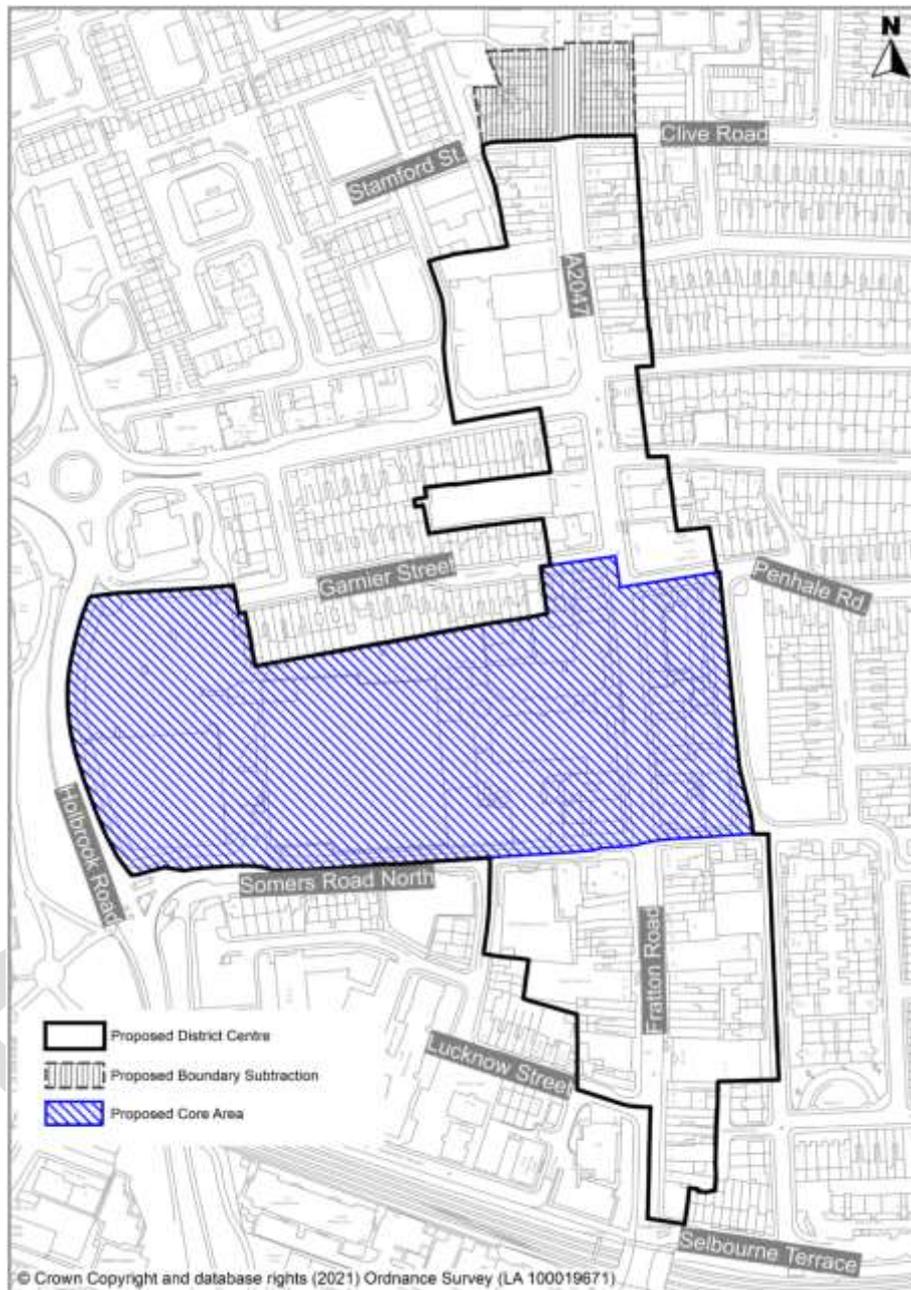
- 3.6.33 A strategy for the centre should aim to improve environmental quality of the area, create more a community hub offer and feel where possible and support the economic viability of the area. The employment uses in Kingston Crescent offer potential for enhancement of this area with complementary 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.

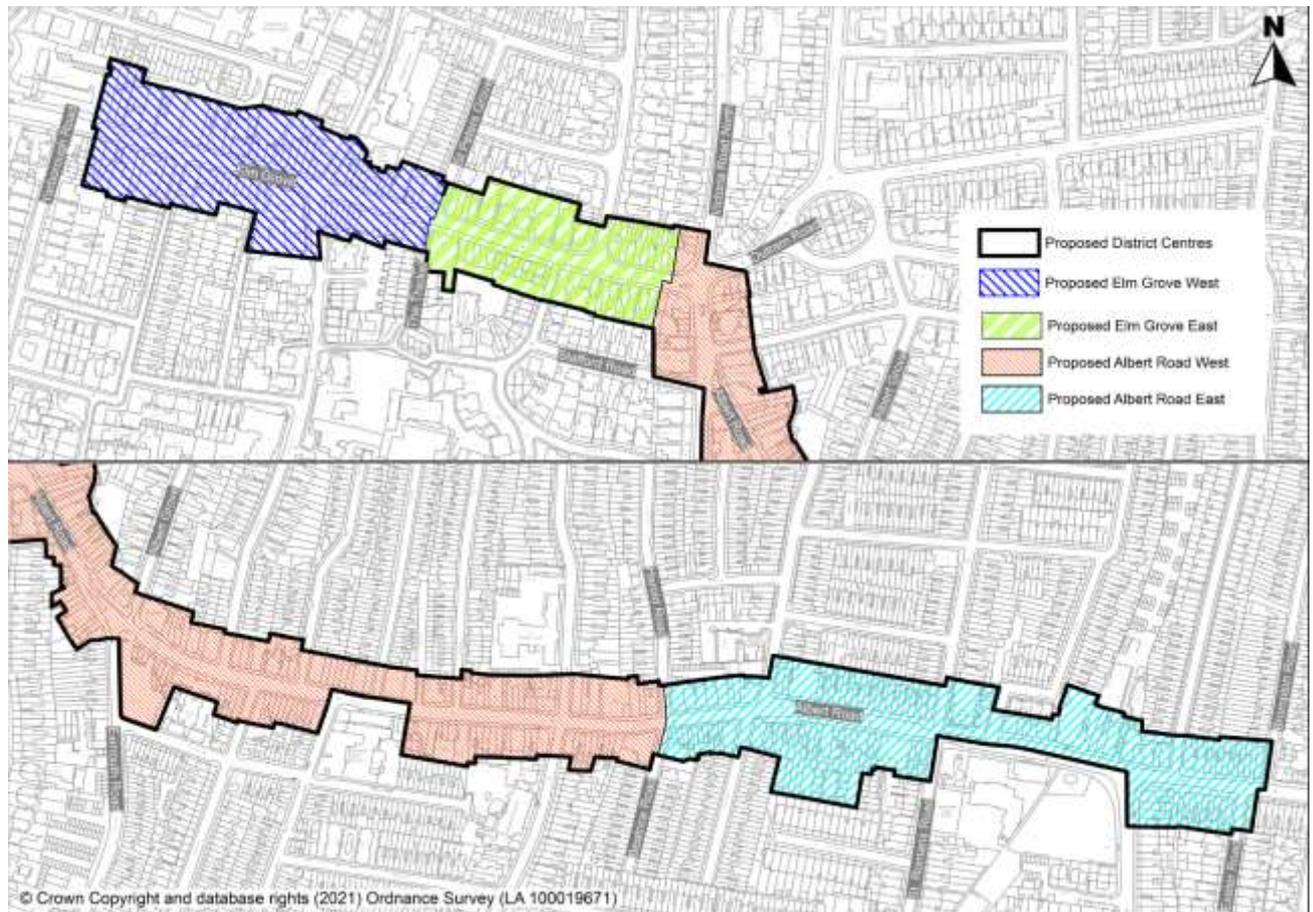
3.6.45 **Draft Vision:** Uplift of the area into a vibrant, accessible centre with a diverse mix of uses supported by new residential development.

#### **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 to 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**

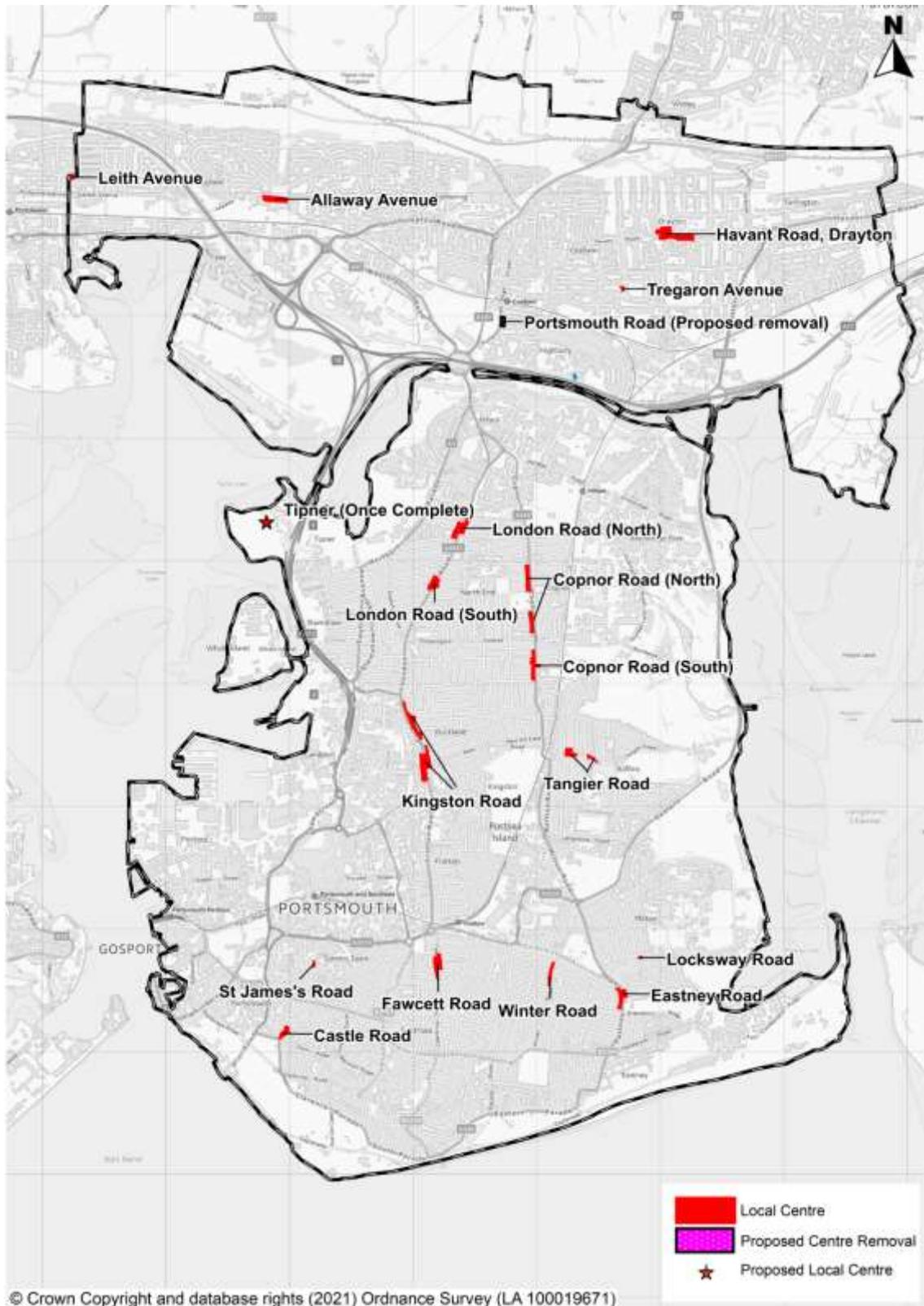
- 3.6.50 The identity of Albert Road and Elm Grove as a centre for independent traders and key local services should be maintained and enhanced, whilst protecting the amenity of the surrounding residential area. Uses and businesses in the centre may need to continue to evolve with changing consumer trends, 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 uses<sup>59</sup> 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

<sup>59</sup> 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"> <li>- Visitor footfall (where available).</li> <li>- Proportions of vacant frontage</li> <li>- New residential, office or hotel development in or adjacent to the centre.</li> </ul>
➤ Maintaining a concentration of preferred uses in core centre areas.	<ul style="list-style-type: none"> <li>- Annual survey of frontage uses</li> </ul>
➤ Extending the duration of active uses.	<ul style="list-style-type: none"> <li>- New development with permitted opening hours beyond 5.30pm</li> </ul>
➤ Ensuring Local Centres provide key services for their local neighbourhoods	<ul style="list-style-type: none"> <li>- Proportion of retail and other town centre uses (biannual survey)</li> <li>- Applications granted for non-residential uses above 500 sq m.</li> </ul>

#### 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 facilities<sup>60</sup> 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 centres<sup>61</sup>, libraries, youth clubs, sports centres and museums<sup>62</sup>. 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.

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<sup>60</sup> 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/>

<sup>62</sup> 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 online<sup>63</sup>.

## 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.

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<sup>63</sup> 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:**

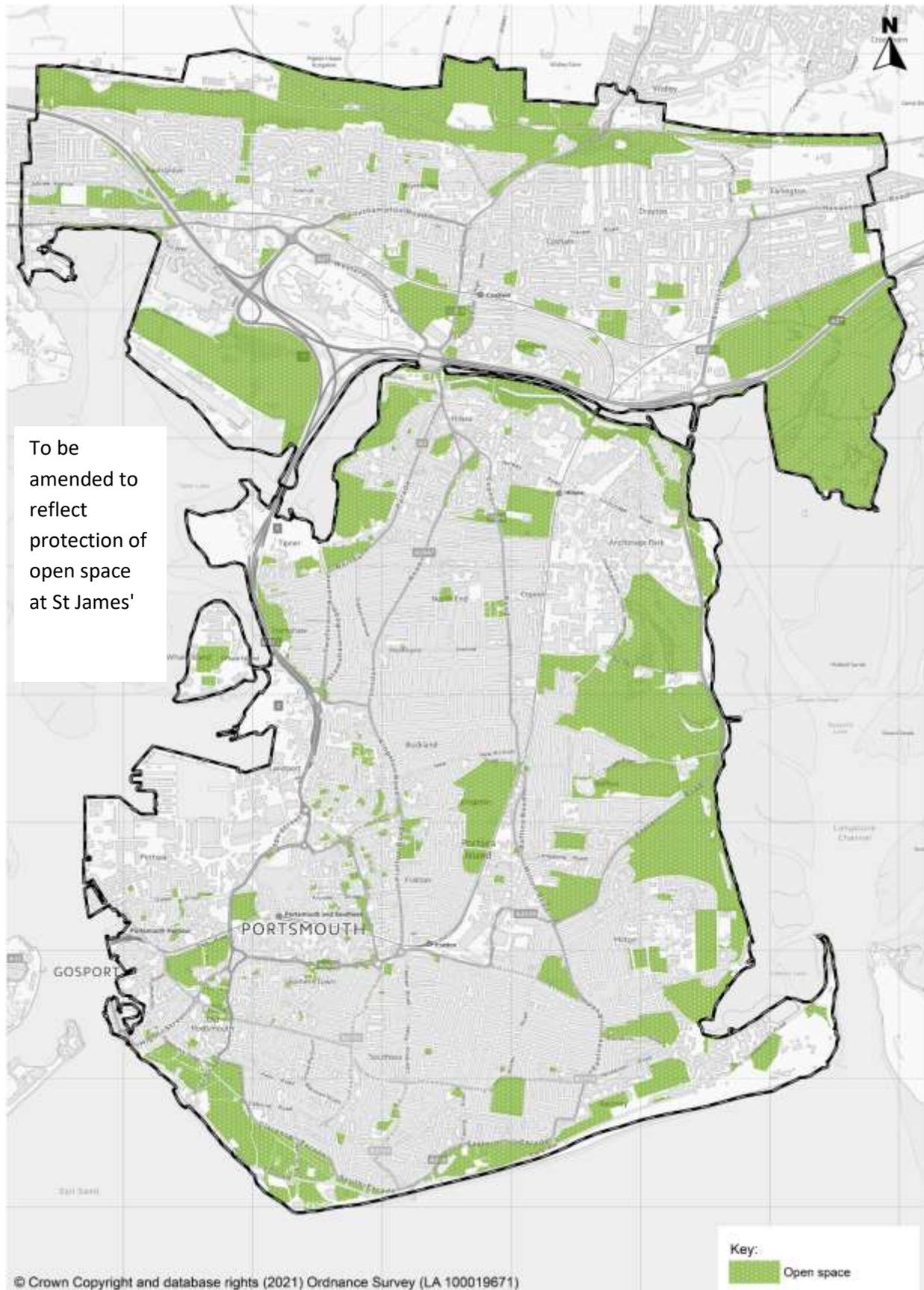
- PCC *Sports Facilities Strategy 2017-2027* (2017)
- Community Right to Bid guidance and Register of Assets of Community Value: <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/community-right-to-bid/>
- Portsmouth City Council leisure services: <https://www.portsmouth.gov.uk/services/leisure/>

**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 designations<sup>64</sup> and registered Village Greens<sup>65</sup> 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.

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

<sup>65</sup> 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 people<sup>66</sup> for proposals of 100 or more new homes<sup>67</sup>, 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,

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<sup>66</sup> 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>

<sup>67</sup> 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 homes<sup>68</sup> 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*

<sup>68</sup> 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?

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### 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 (AQMA) 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 1996<sup>69</sup>. 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'<sup>70</sup>. 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.

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<sup>69</sup> DfT National Travel Survey data

<sup>70</sup>The 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 2008<sup>71</sup>. 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.<sup>72</sup> 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.<sup>73</sup>

### **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

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<sup>71</sup> Portsmouth and South East Hampshire Transforming Cities Fund Strategic Outline Case 2020

<sup>72</sup> Local Trust 2019, Left behind? Understanding communities on the edge

<sup>73</sup> 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 5km<sup>74</sup>. 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 city<sup>75</sup> with around 40% of trips entirely within the city also being by car, despite these trips having an average length of 5km<sup>76</sup>. This led to congestion at peak times with vehicles travelling on average 32% slower in Portsmouth than the national average<sup>77</sup>, 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 congestion<sup>78</sup>. 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%<sup>79</sup> and delay of over 50% by 2036<sup>80</sup>. 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

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<sup>74</sup> Census 2011 Travel to work data

<sup>75</sup> Google Environmental Insights Explorer

<sup>76</sup> Google Environmental Insights Explorer

<sup>77</sup> Portsmouth and South East Hampshire Transforming Cities Fund application form

<sup>78</sup> Portsmouth and South East Hampshire Transforming Cities Fund Strategic Outline Business Case 2020

<sup>79</sup> Portsmouth and South East Hampshire Transforming Cities Fund Strategic Outline Business Case 2020

<sup>80</sup> 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 elsewhere<sup>81</sup>, 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:

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<sup>81</sup> 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 Go<sup>82</sup> 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

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<sup>82</sup> 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 agreements<sup>83</sup>) 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)<sup>84</sup>. 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.

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<sup>83</sup> 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.

<sup>84</sup>Neighbourhood 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 appropriate<sup>85</sup>, 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

<sup>85</sup> 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"> <li>- Provision of critical infrastructure and delivery of other project as set out in the IDP.</li> <li>- Annual reporting of CIL contributions and relevant planning obligations.</li> </ul>

**Further Information**

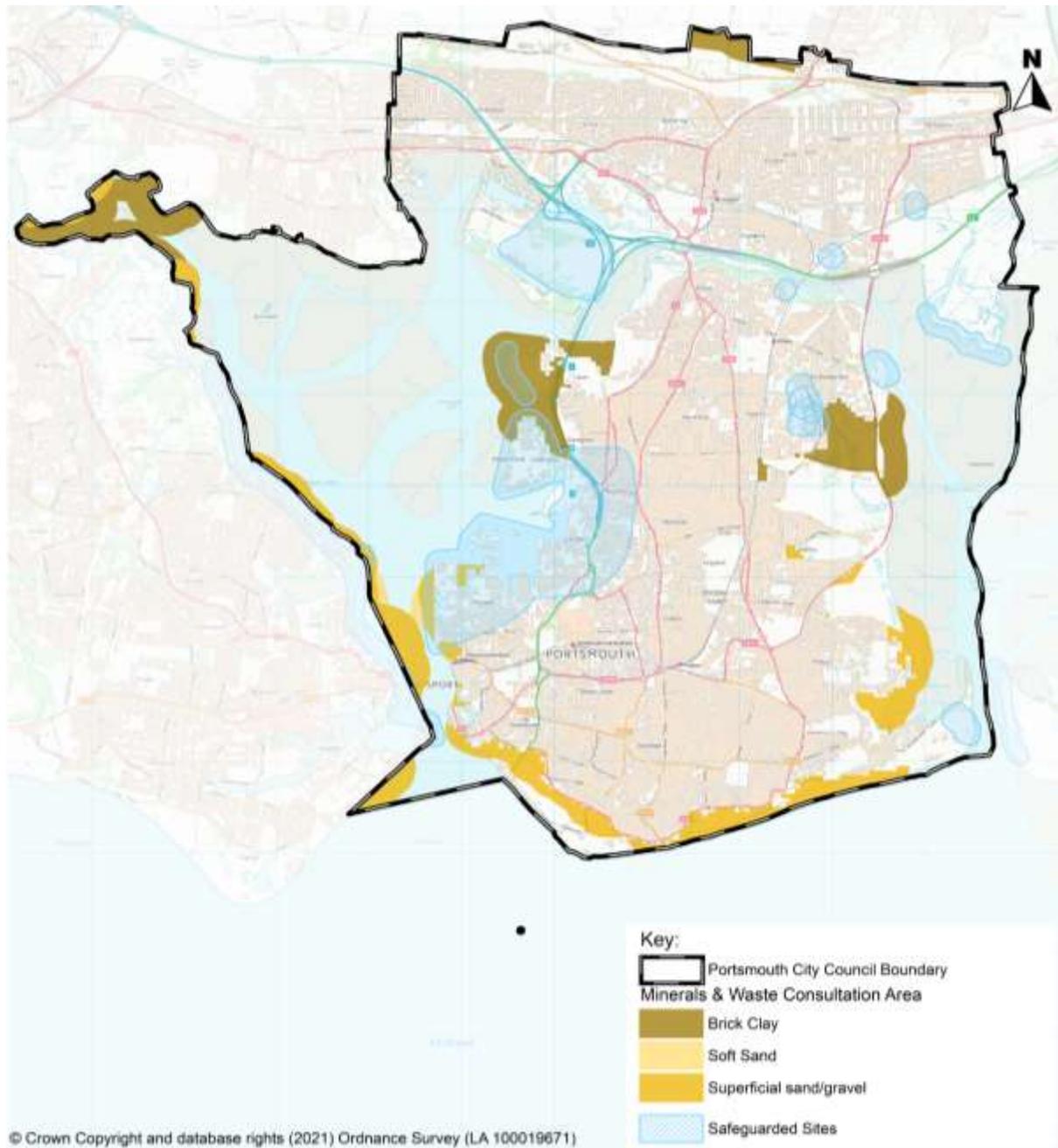
- PCC (2020) *Draft Infrastructure Delivery Plan (IDP)*
- PCC (2012) *CIL Charging Schedule*
- PCC CIL information: <https://www.portsmouth.gov.uk/services/development-and-planning/community-infrastructure-levy-cil/>

**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.

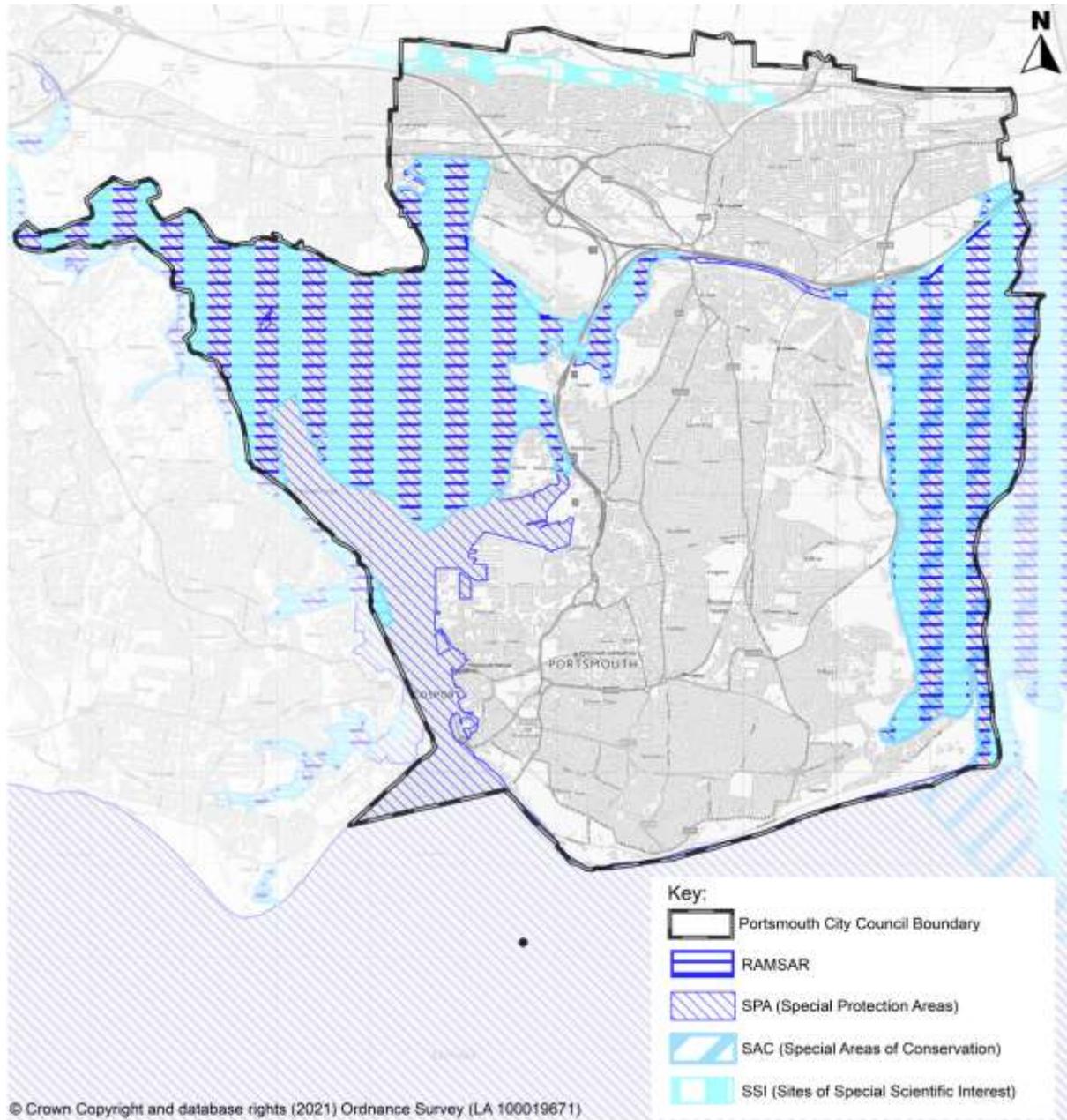
**Further information:**

- 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 2016/17<sup>86</sup>. 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).

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<sup>86</sup> 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"> <li>- Special Protections Areas (SPAs)</li> <li>- Special Areas of Conservation (SACs)</li> <li>- Sites of Special Scientific Interest (SSSIs)</li> </ul>	<ul style="list-style-type: none"> <li>- Local Nature Reserves (LNRs)</li> <li>- Local Wildlife Sites or 'Sites of Importance to Nature Conservation' (SINCs)</li> <li>- Roadside Verges of Ecological Importance (RVEIs)</li> <li>- Hampshire Priority Habitats and Species</li> </ul>
Existing Sites		
<ul style="list-style-type: none"> <li>- Portsmouth Harbour Ramsar</li> <li>- Chichester and Langstone Harbours' Ramsar</li> </ul>	<ul style="list-style-type: none"> <li>- Portsmouth Harbour SPA</li> <li>- Chichester and Langstone Harbours SPA</li> <li>- Solent and Isle of Wight Lagoons SAC</li> <li>- Solent Maritime SAC</li> <li>- Solent and Dorset Coast SPA</li> <li>- Portsdown Hill SSSI</li> <li>- Portsmouth Harbour SSSI</li> <li>- Langstone Harbour SSSI</li> </ul>	<ul style="list-style-type: none"> <li>- Milton Lock LNR</li> <li>- Farlington Marshes LNR</li> <li>- 28 SINCs, 2 RVEIs and 30 Priority Habitats/ Species</li> </ul>

### 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"> <li>- Planning applications refused on biodiversity grounds.</li> <li>- Extent of priority habitat and nature conservation designations.</li> <li>- Condition of SSSIs.</li> <li>- Status of notable species</li> <li>- 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.</li> </ul>
➤ Biodiversity net gains	<ul style="list-style-type: none"> <li>- Planning applications granted with a Biodiversity Mitigation and Enhancement Plan.</li> </ul>

**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**

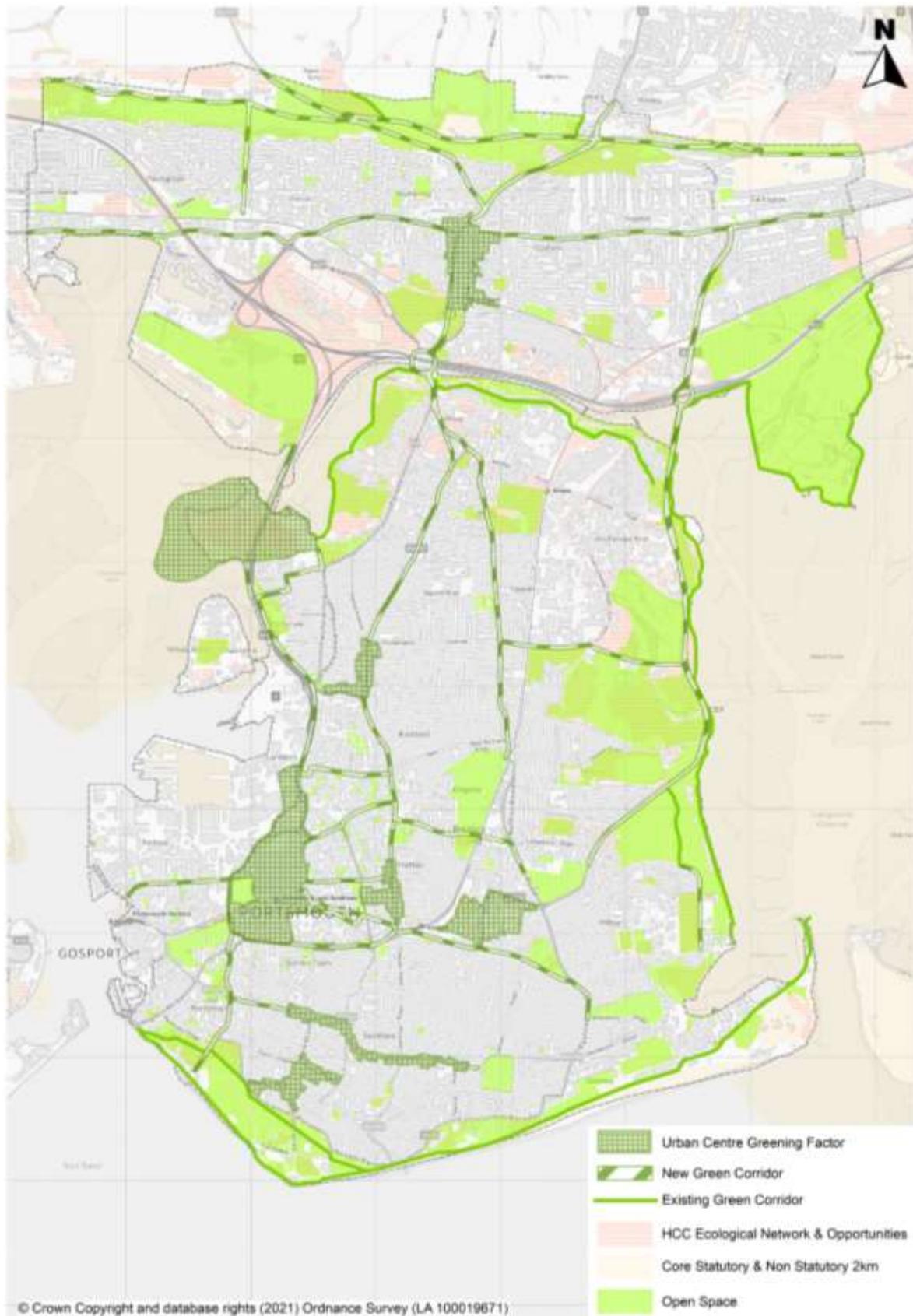
a. Do you agree with the proposed approach to Policy G1? If not what changes would you suggest and why?

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

DRAFT

## 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 years<sup>87</sup>. 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

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<sup>87</sup>PCC (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 achieved<sup>88</sup>. 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.

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<sup>88</sup> 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'<sup>89</sup> 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

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<sup>89</sup> 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. <sup>90</sup>
➤ 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?

<sup>90</sup> 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 eutrophication<sup>91</sup> 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*<sup>92</sup>, 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 approvals<sup>93</sup> 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).

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<sup>91</sup> 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.

<sup>92</sup> *Conservation of Habitats and Species Regulations (England and Wales) Regulations 2017 (as amended)*

<sup>93</sup> 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,<sup>94</sup> 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)<sup>95</sup> 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 condition<sup>96</sup>, are intended to ensure that there is

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<sup>94</sup> 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)

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

<sup>96</sup> 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).<sup>97</sup> 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.

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<sup>97</sup> 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

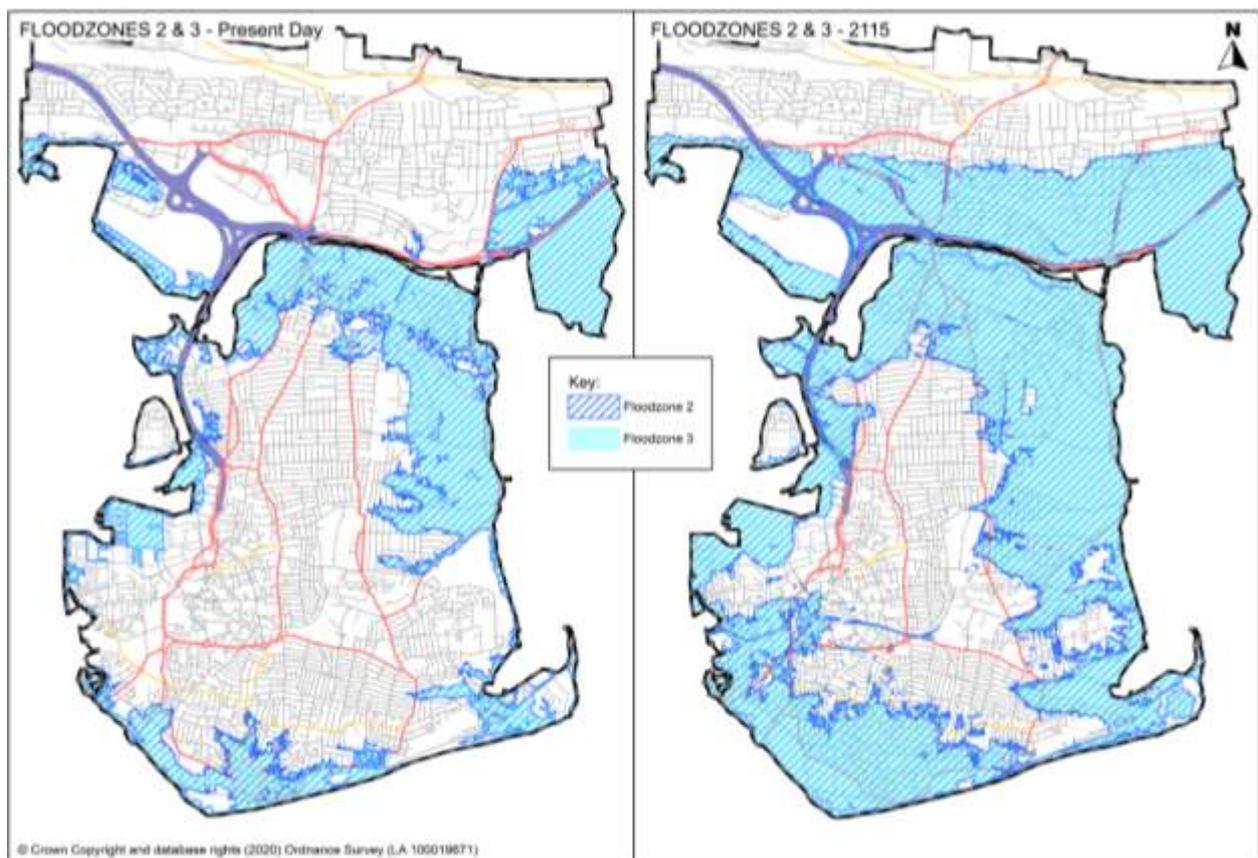
- PCC Contaminated Land Strategy: <https://www.portsmouth.gov.uk/ext/your-council/policies-and-strategies/contaminated-land>

### 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 Partners<sup>98</sup>, an allegiance formed to take a strategic approach to coastal management in the region<sup>99</sup>. 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.

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

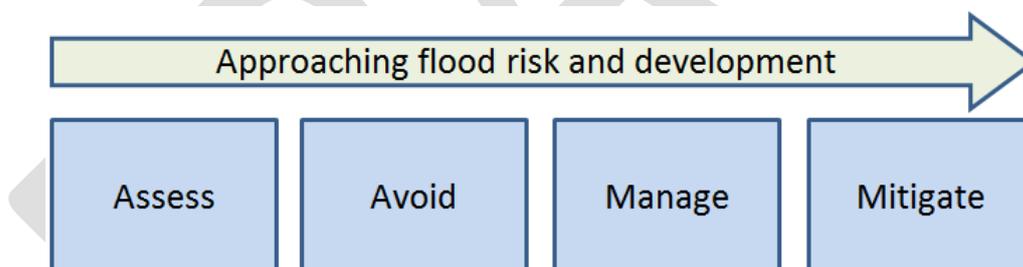
<sup>99</sup> Fareham Borough Council, Gosport Borough Council, Havant Borough Council and Portsmouth City Council authority areas.

- 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 region<sup>100</sup>. 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

<sup>100</sup> 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 eutrophication<sup>101</sup> 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).

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<sup>101</sup> 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"> <li>- Applications granted planning permission with a certified sustainability assessment; and the number of permitted schemes achieving the required level of certification.</li> <li>- Planning applications refused in accordance with this policy.</li> </ul>
➤ Reducing the risks from overheating and the impacts of the Urban Heat Island effect	<ul style="list-style-type: none"> <li>- Applications granted planning permission with a Cooling Strategy</li> </ul>
➤ 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"> <li>- Number of major applications accompanied by a HIA</li> </ul>

#### 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 (NO<sub>2</sub>) 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 zone<sup>102</sup>.

## 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.

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<sup>102</sup> 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 guidance<sup>103</sup>. 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.

<sup>103</sup> 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?

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## 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 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 Regulations<sup>104</sup> 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

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<sup>104</sup> 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)<sup>105</sup>. 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.

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<sup>105</sup> *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*<sup>106</sup> 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.

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<sup>106</sup>To 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?
  - 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 assets<sup>107</sup> 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 20<sup>th</sup> 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

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<sup>107</sup> 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.

## DRAFT DEVELOPMENT MANAGEMENT POLICY D5: HERITAGE AND ARCHAEOLOGY

- 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"> <li>- Number of decisions refused on heritage grounds</li> <li>- Number of objections from Historic England</li> </ul>

#### 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)
➤ Protecting and enhancing the city's conversation areas, listed buildings and other heritage assets.	<ul style="list-style-type: none"><li>- Heritage assets within the city on the 'heritage at risk register'</li><li>- Decisions refused on heritage grounds</li><li>- Conservation Areas with an up to date Appraisal</li></ul>

### Question 31. Heritage Enhancement

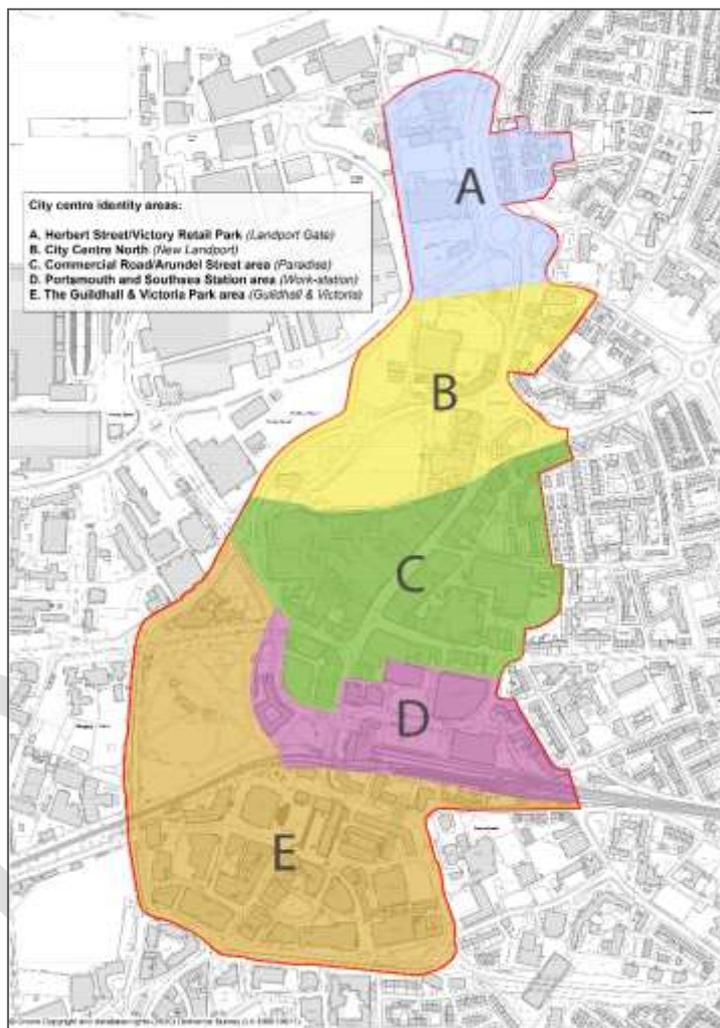
- a. Do you agree with the proposed approach to Policy D6?
- b. If not what changes would you suggest and why?

## 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 heights<sup>108</sup>. 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.<sup>109</sup>

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.

<sup>108</sup> All space assumptions for indicative development capacities are detailed on page 62 and Appendix 4 of the CCDS.

<sup>109</sup> 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.

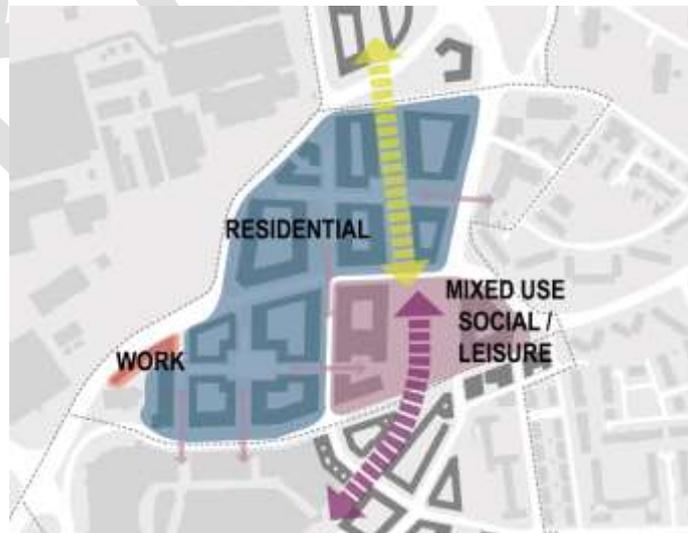


7.1.20 Alternatively, (2.) residential redevelopment could be limited to the southern half of the site, retaining the existing employment uses to the north; or (3.) the whole area could be allocated for employment uses, given the proximity to existing employment land to the north and west of the site 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;

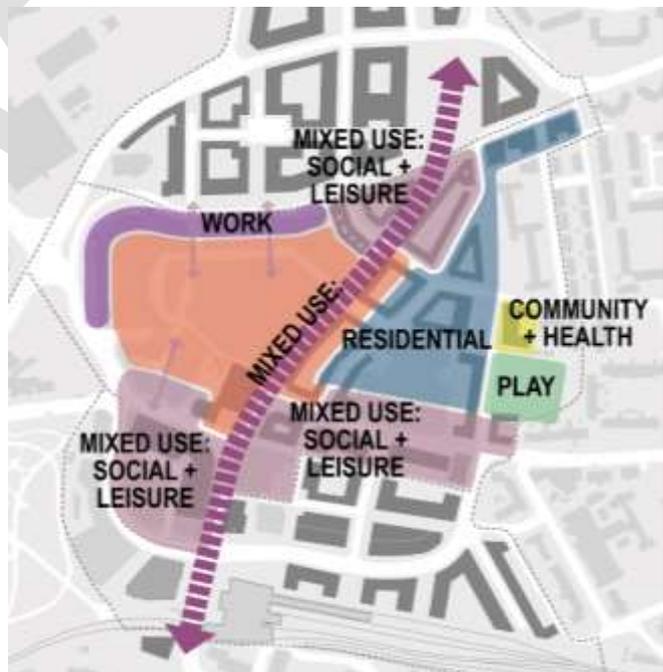


with potential for additional new residential and mixed use development and as a location for civic and commercial uses. There is also potential for a new public square or other improved public realm areas to provide another key focal space for the City Centre. There are potential opportunities for enhancements to Hope Street and Marketway to create better streets and connections for people.

## C - Commercial Road/Arundel Street area ('Paradise')



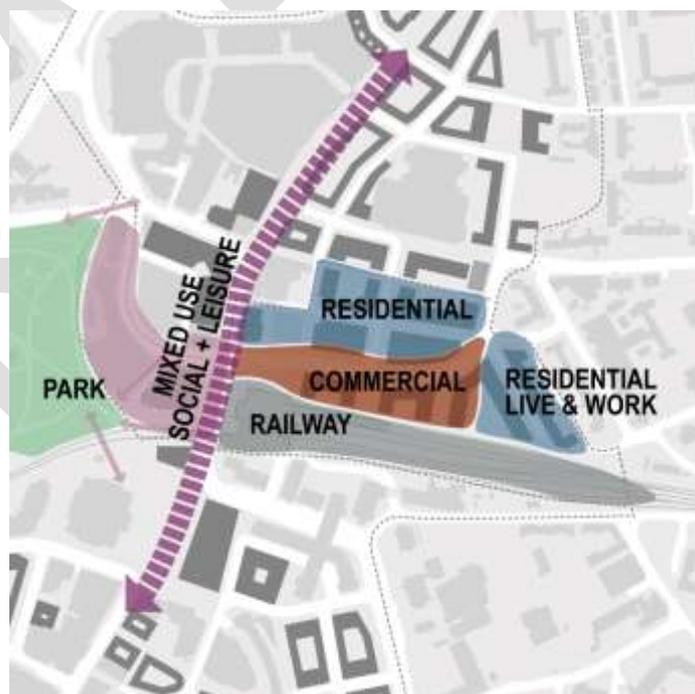
7.1.22 The area covers Commercial Road and the connecting streets, inc. Arundel Street, Charlotte Street, and Edinburgh Road. Commercial Road itself is currently a traditional pedestrianised 'high street' destination that includes the Cascades Shopping Centre. This area is envisioned to have potential 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')

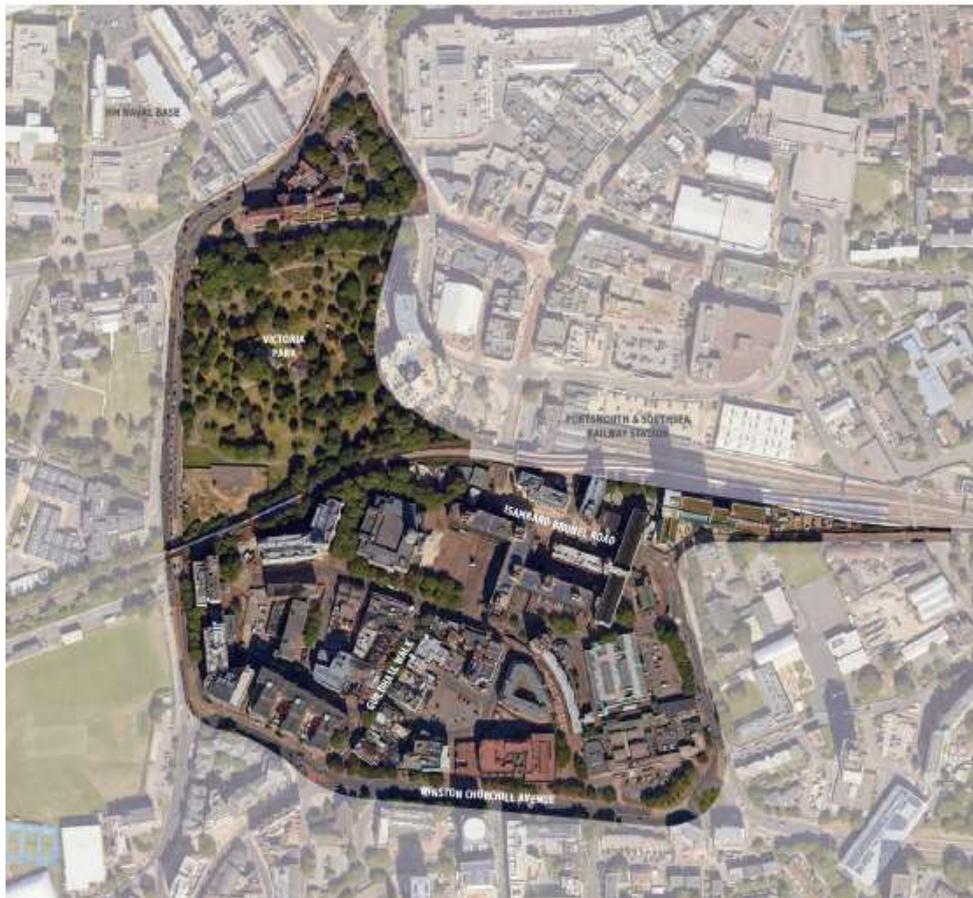


7.1.23 This area covers Portsmouth and Southsea Station, the Matalan retail unit and car park, Stanhope Road car park and the area around Station Road/Slindon Street. This area has the potential to be focused on creating high-quality, mixed-use developments for commercial workspaces, social/leisure space and new residential dwellings.

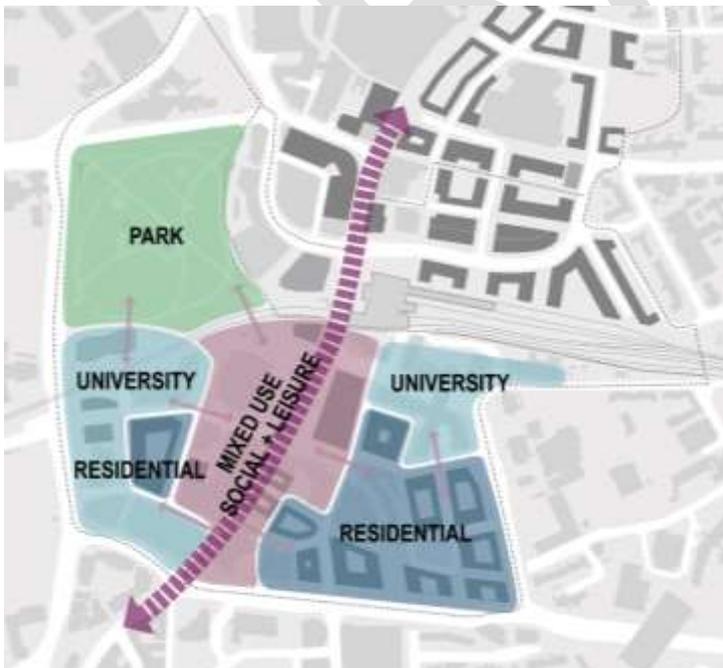


7.1.24 New development should be centered around the area's public transport provision, such as the railway station and bus network. A key focus will be on enhancing the arrival experience and associated public realm to create a welcoming and high-quality environment. The setting of the Listed Station 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')



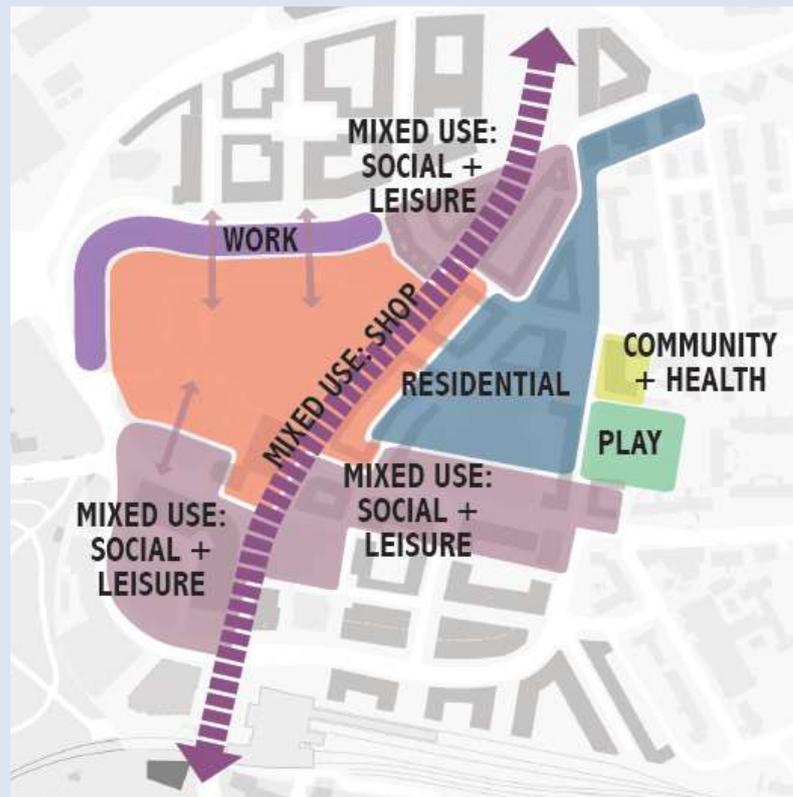
- i. Delivery of a significant number of new homes (approx. 1,430 - 1,650), plus commercial and leisure floorspace and community/ health uses (c.24,900 - 33,000 sq m);
- ii. Continuation of the new linear green park, designed for all ages, as a place-maker and to create an active link to Commercial Road;
- 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')



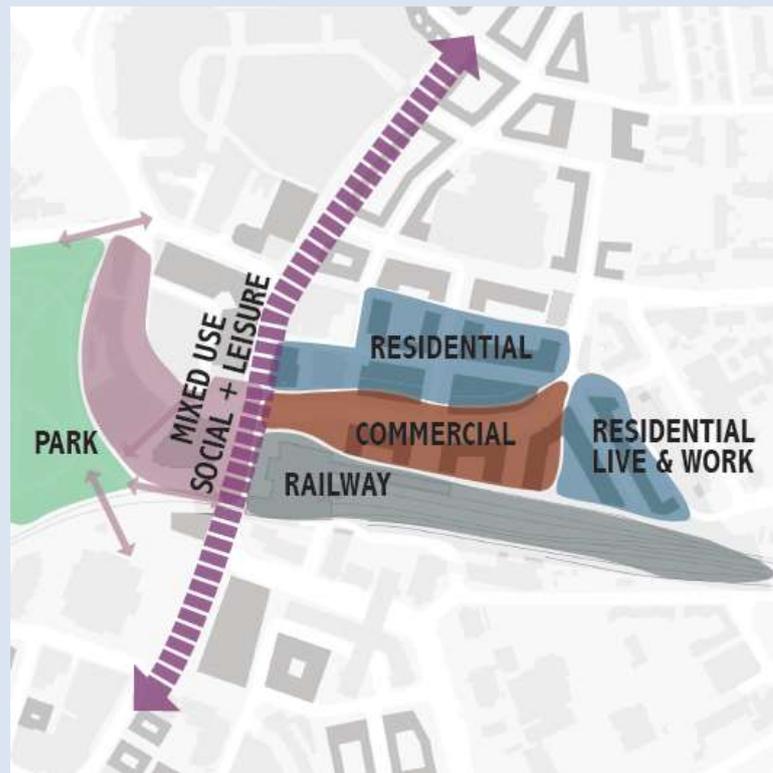
- i. Delivery of a significant number of new homes (aprox. 1,310 - 1,540) and additional commercial and leisure floorspace and community/ health uses (c.10,200 - 11,500 sqm)
- ii. Fundamental shift from a retail-only focus to include a diverse range of work, social, and leisure uses;
- iii. A consistent 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')



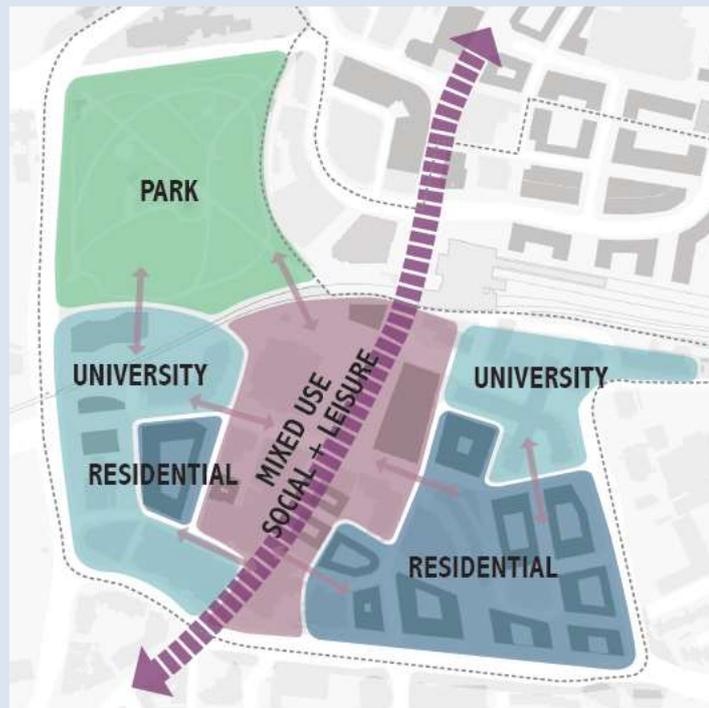
- i. Redevelopment to a contemporary mixed-use employment area, with new homes (aprox. 670 - 770), commercial floorspace and social and leisure uses (c.25,100 - 26,900 sqm)
- ii. Provision of a variety of employment space formats, with active and attractive frontages onto Station Street;
- iii. Enhancement 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

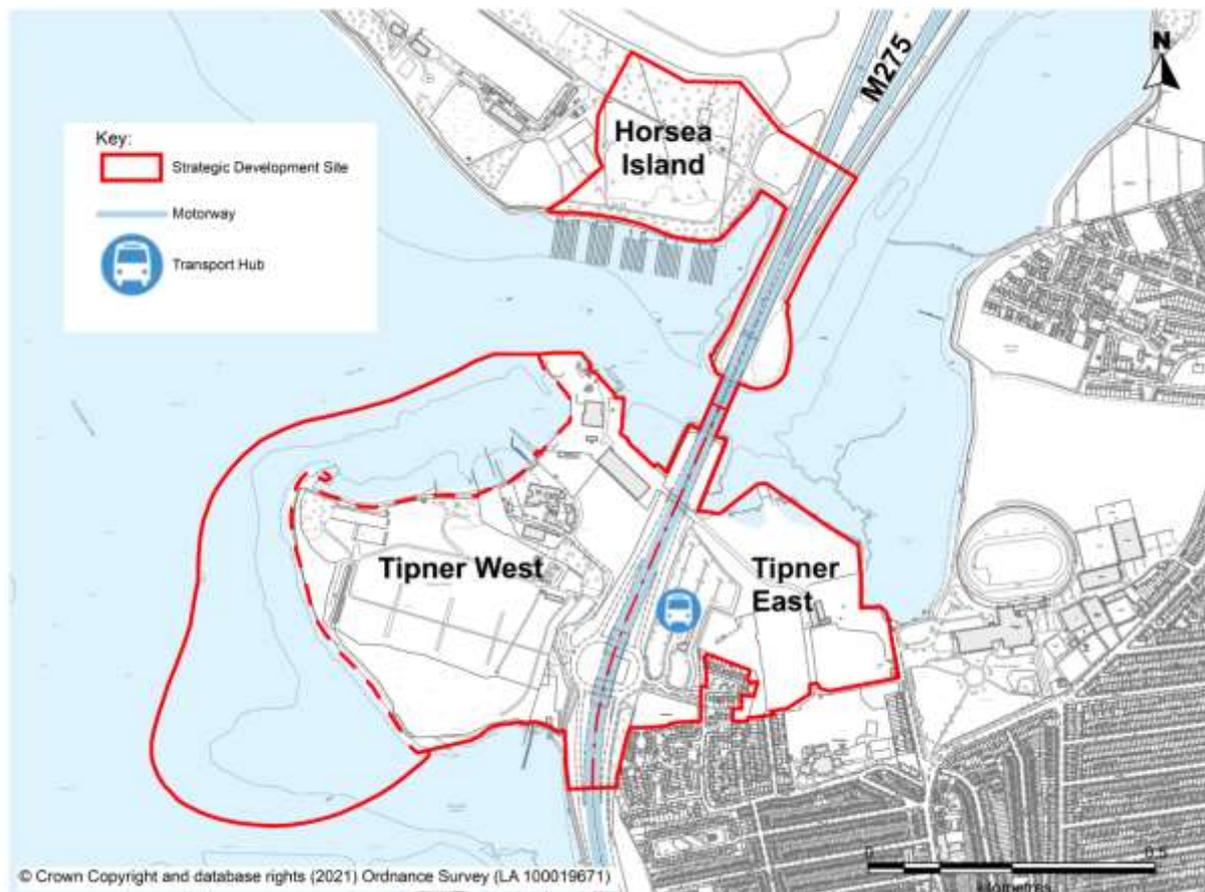
Policy Aim	Key Indicator
➤ The delivery of 5,180 - 6,120 new homes, approximately 77,100 - 88,300 sqm of new commercial floorspace (Use Class E), and c.10,700 sqm of education floorspace (Use Class F1).	- Grant of planning permission(s) and progress towards site delivery

### 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 tests<sup>110</sup>, 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.

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<sup>110</sup> 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 21<sup>st</sup> 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)

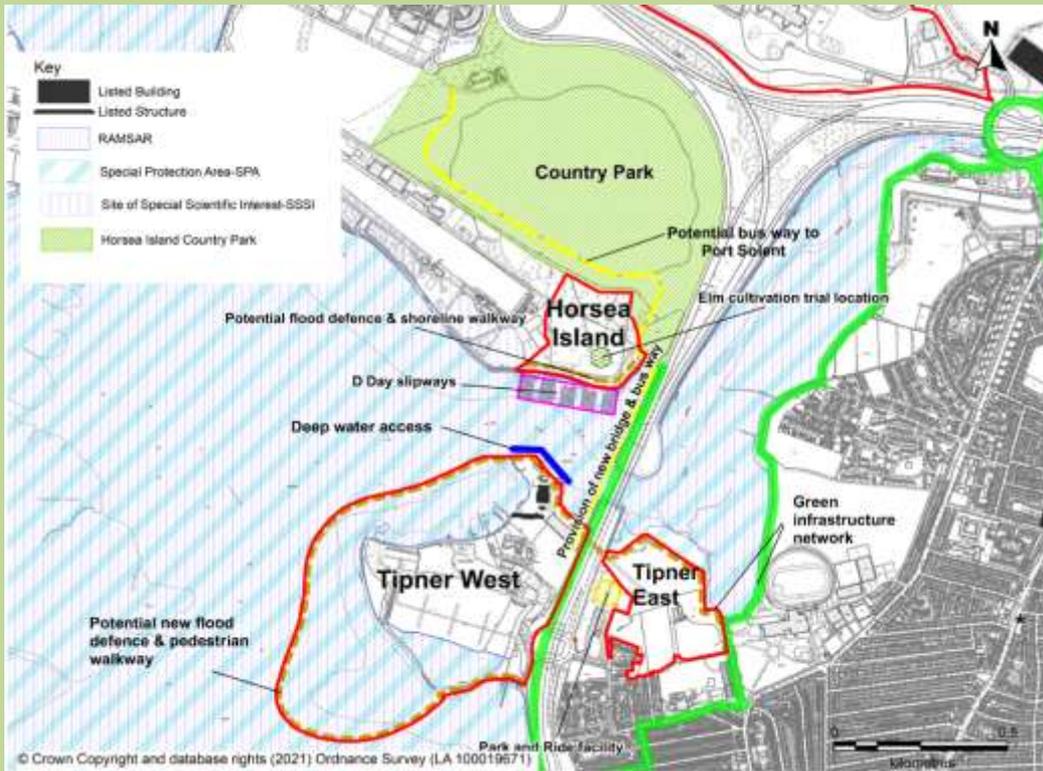
- 7.2.12 While development at Tipner East would continue to be supported no development allocation would be made at Tipner West. Major investment and regeneration (including the provision of flood defence infrastructure) would not be supportable in this location without new homes to help enable other 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 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 addressed 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**<sup>111</sup> 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.

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<sup>111</sup> 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)<sup>112</sup>, 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*;

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<sup>112</sup> 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**

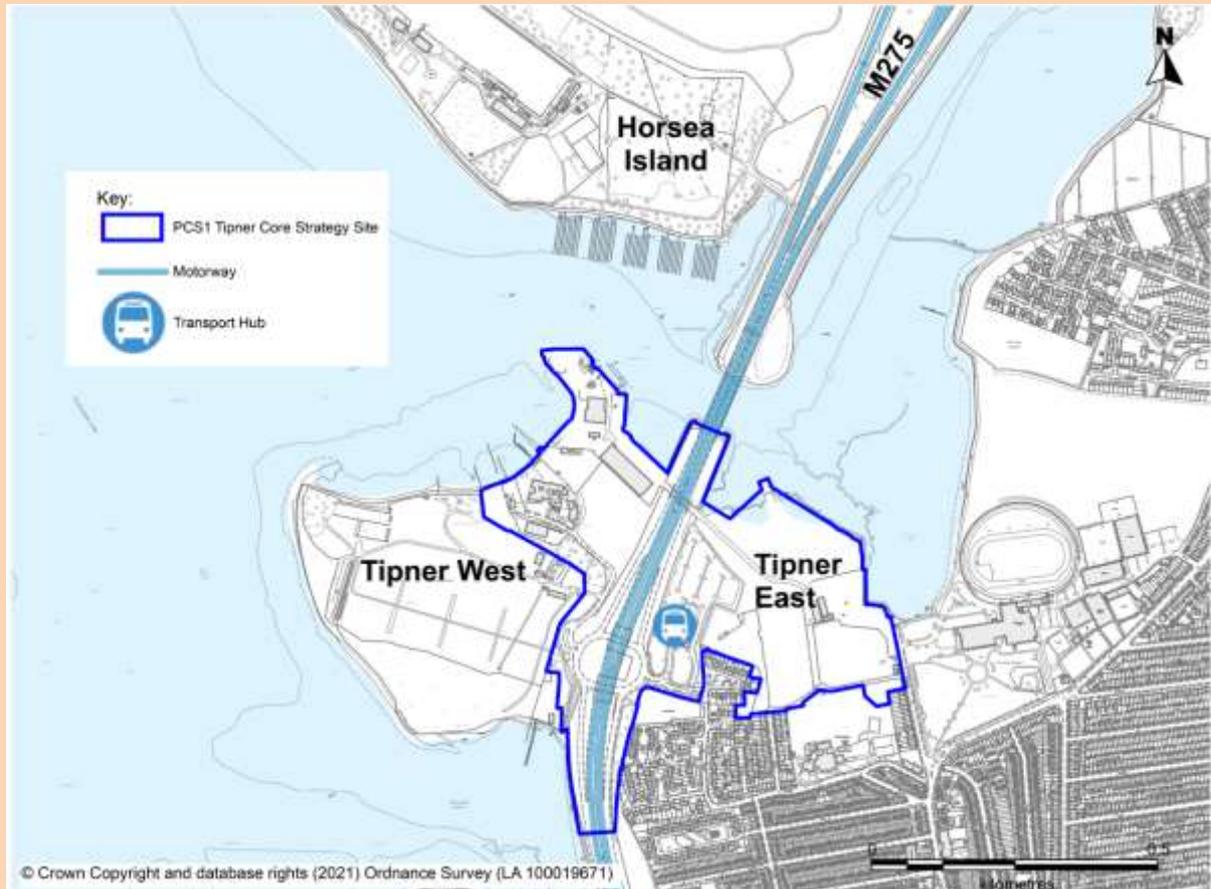
Land at Horsea Island is allocated for 30,270sqm of Marine Employment. Planning permission will be granted where it can be demonstrated that:

- 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 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*.

- 7.2.38 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)<sup>113</sup>, 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;

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<sup>113</sup> 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**

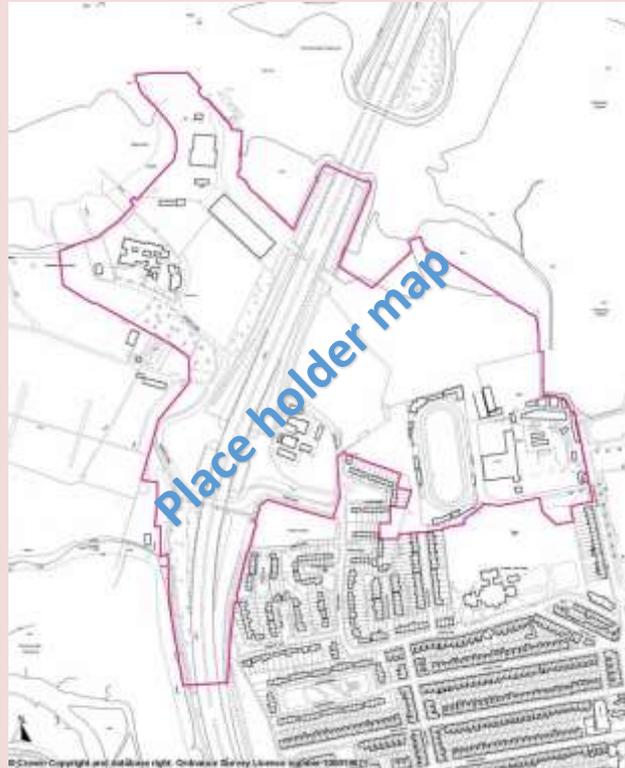
Land at Horsea Island is allocated for public open space. Planning permission in line with this allocation will be granted where it can be demonstrated that:

- 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.

## DRAFT STRATEGIC POLICY S2: TIPNER (OPTION 3)

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)

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.

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.

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?

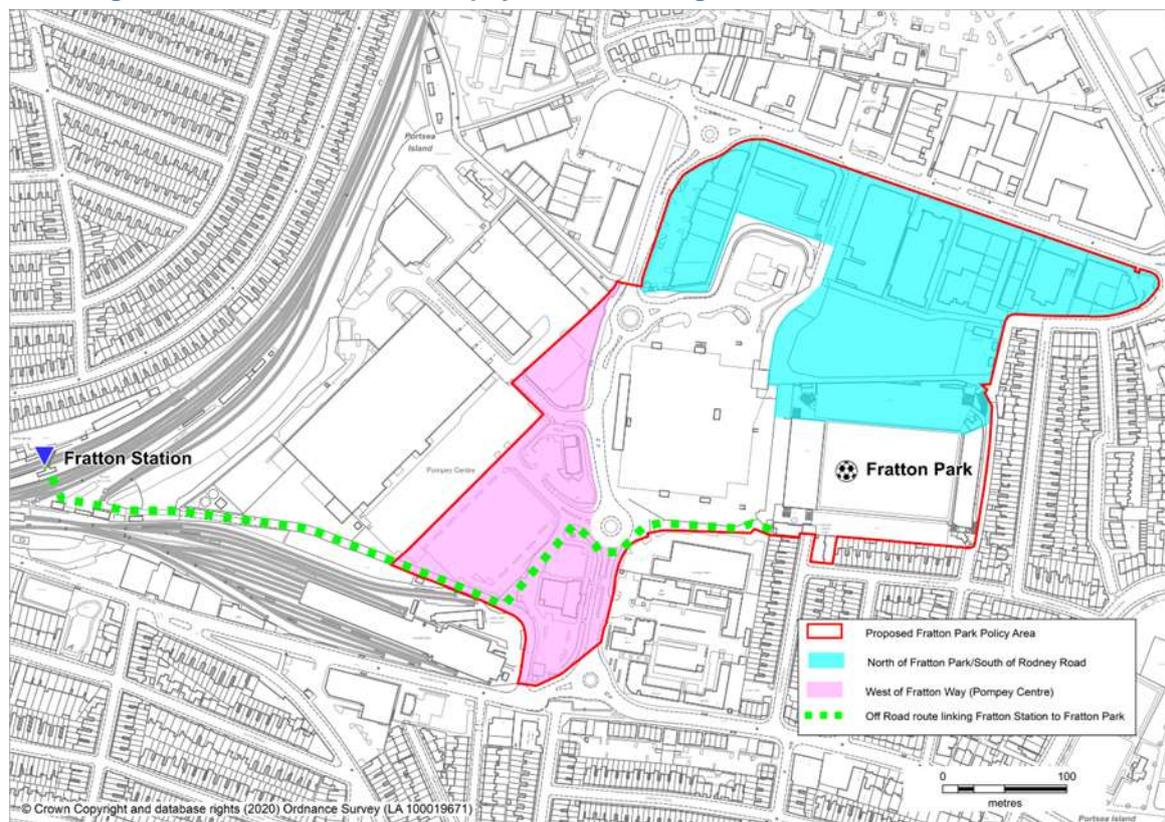
##### c. Option 3. Maintain (no strategic scale development)

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.

## Policy S3: Fratton Park and the Pompey Centre

### **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:

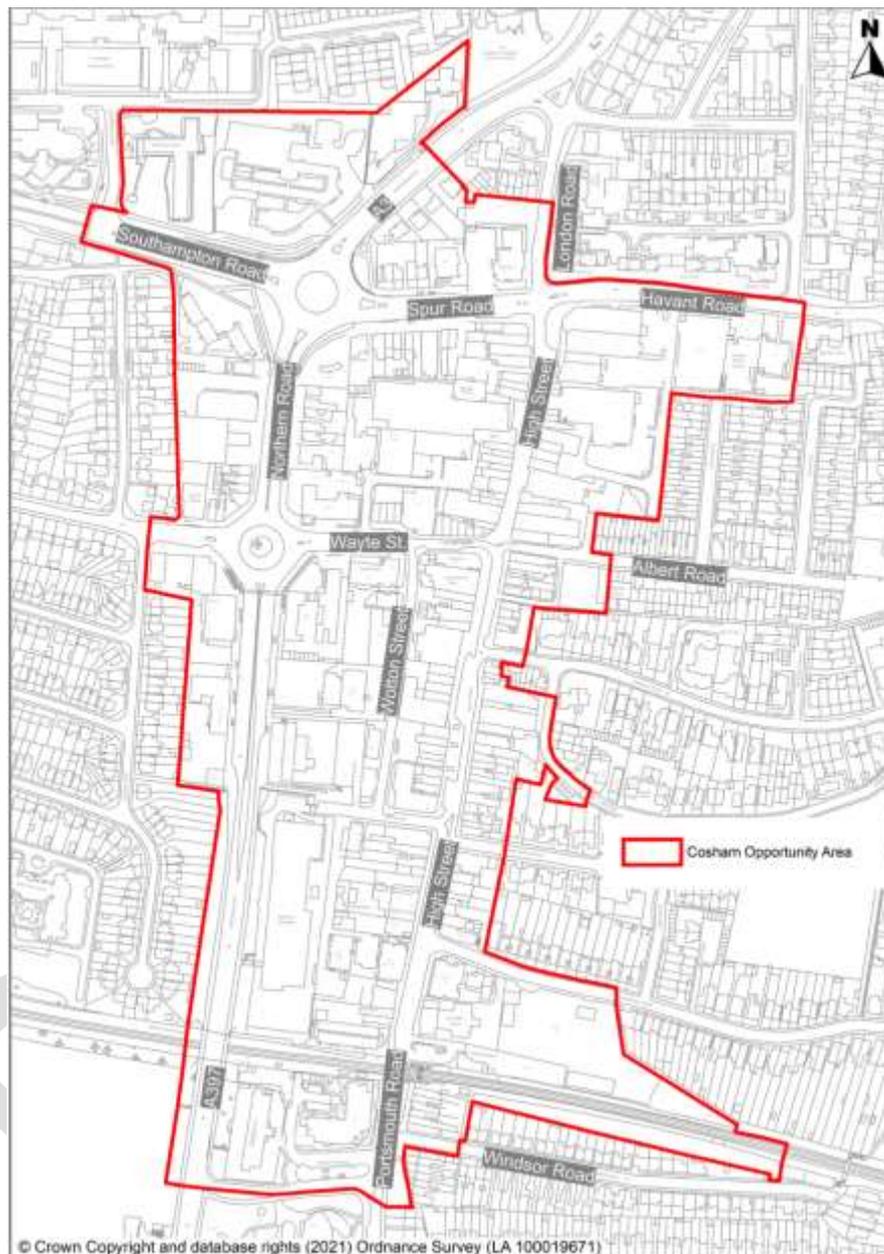
- PCC (2021) *Housing and Economic Land Availability Assessment*

#### 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"> <li>- Planning permissions granted for new housing and employment space within the allocation boundary.</li> <li>- Completions within the allocation boundary.</li> </ul>

#### Further Information

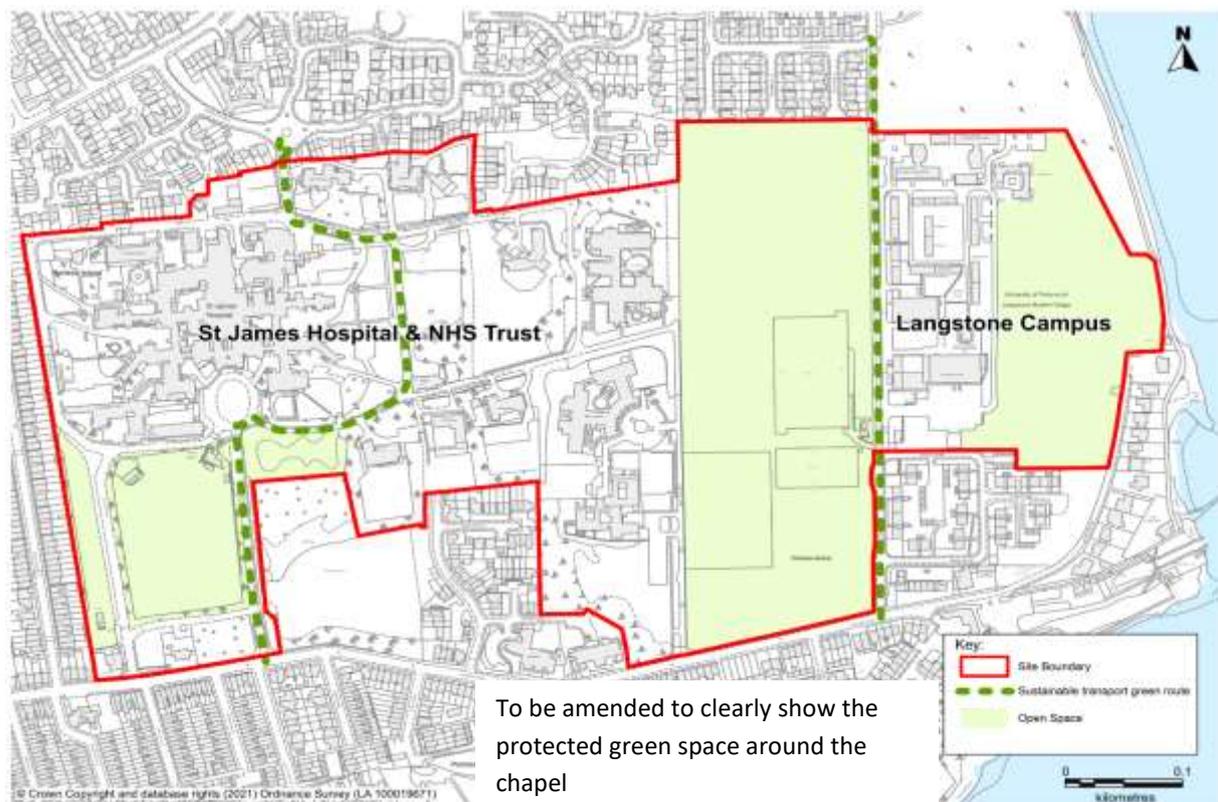
- PCC (2021) *Housing and Economic Land Availability Assessment (HELAA)*
- PCC (2021) *Retail and Town Centres background paper*

#### 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"> <li>➤ Delivery of the type and quantum of development listed.</li> <li>➤ Appropriate mitigation for identified environmental, transport and heritage constraints</li> </ul>	<ul style="list-style-type: none"> <li>- Permissions and completions</li> <li>- Planning permissions granted with appropriate conditions / no objections from statutory consultees.</li> </ul>

### Further Information:

- PCC (2021) *Housing and Economic Land Availability Assessment*.

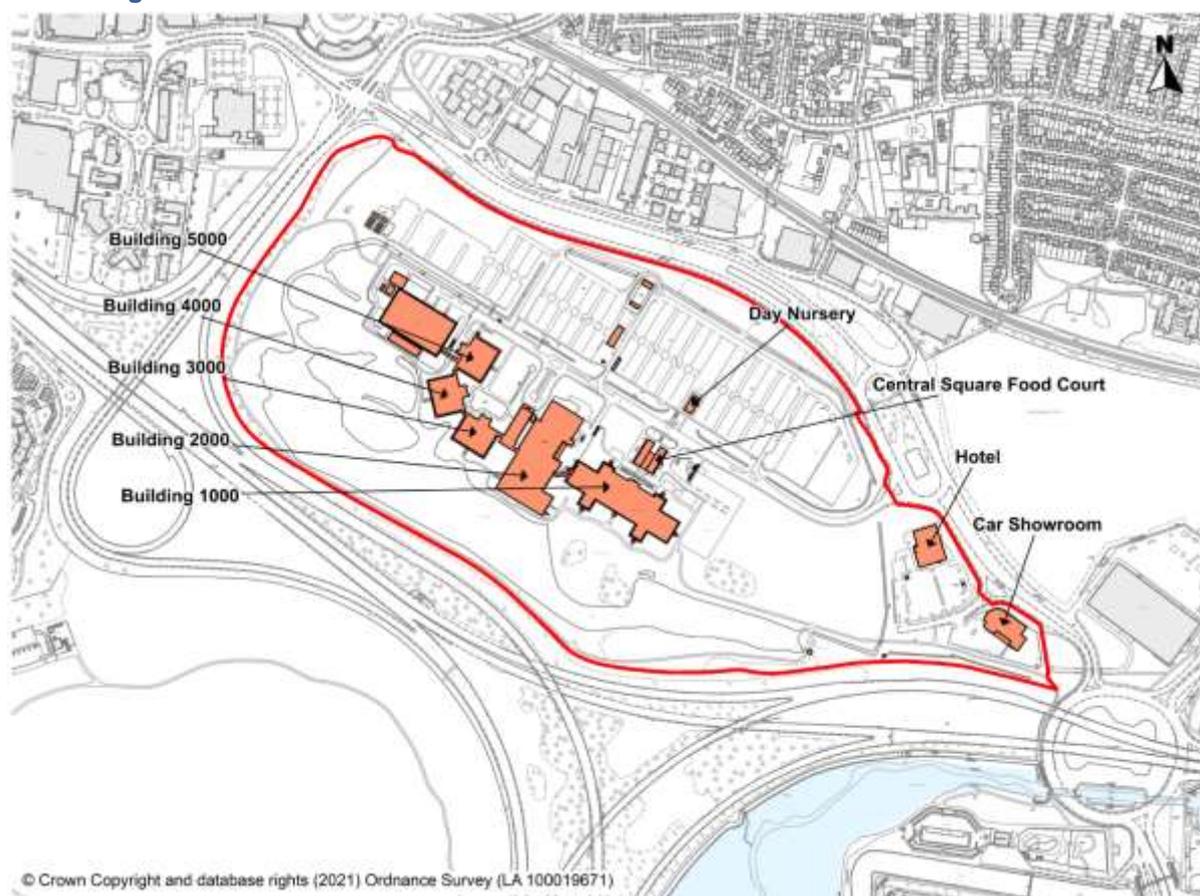
### Question 42. St James' and Langstone Campus

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*

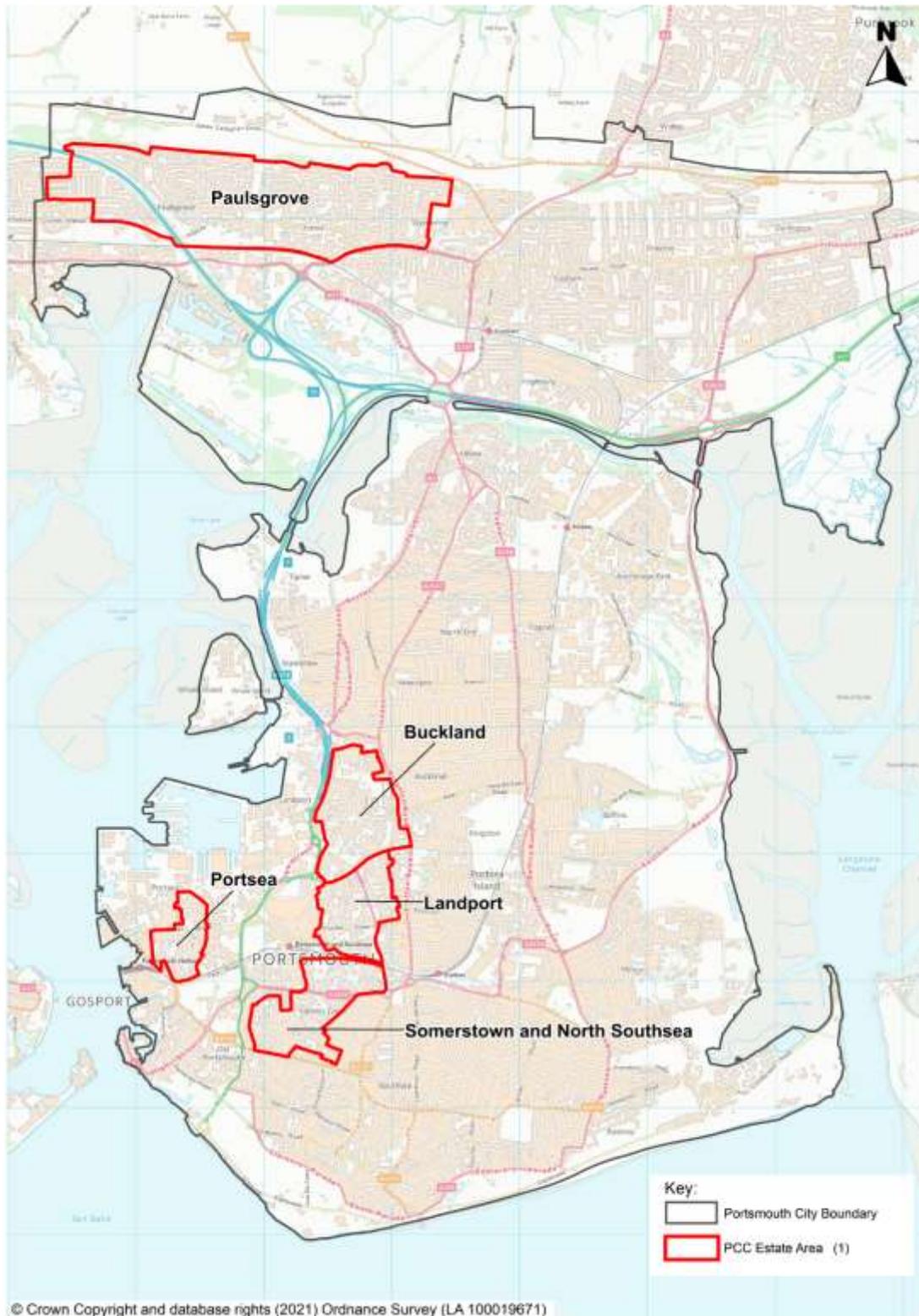
### Question 43. Lakeside North Harbour

- 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-20<sup>th</sup> 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 permission<sup>114</sup> 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

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<sup>114</sup> 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

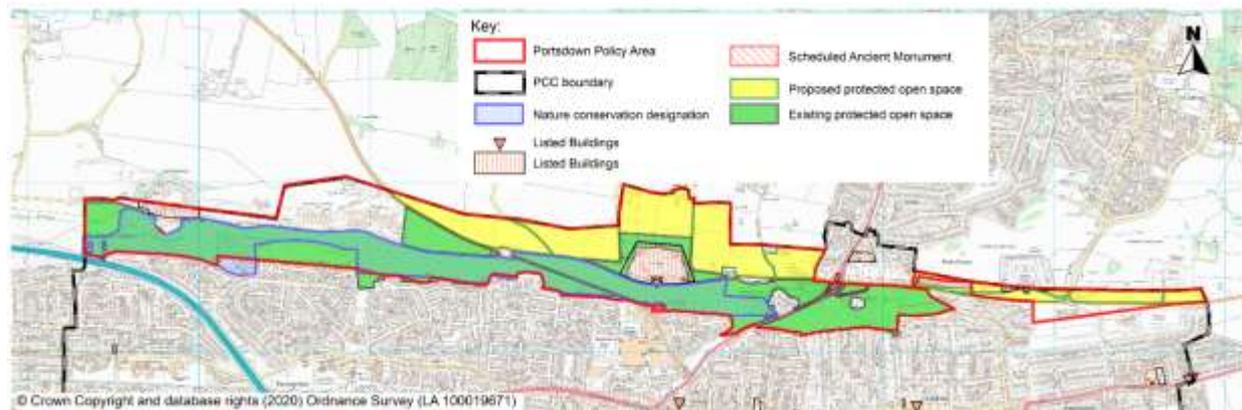
- PCC (2021) Seafront Masterplan Supplementary Planning Document
- PCC *Portsmouth Parks and Open Spaces Strategy 2012-2022*

### 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

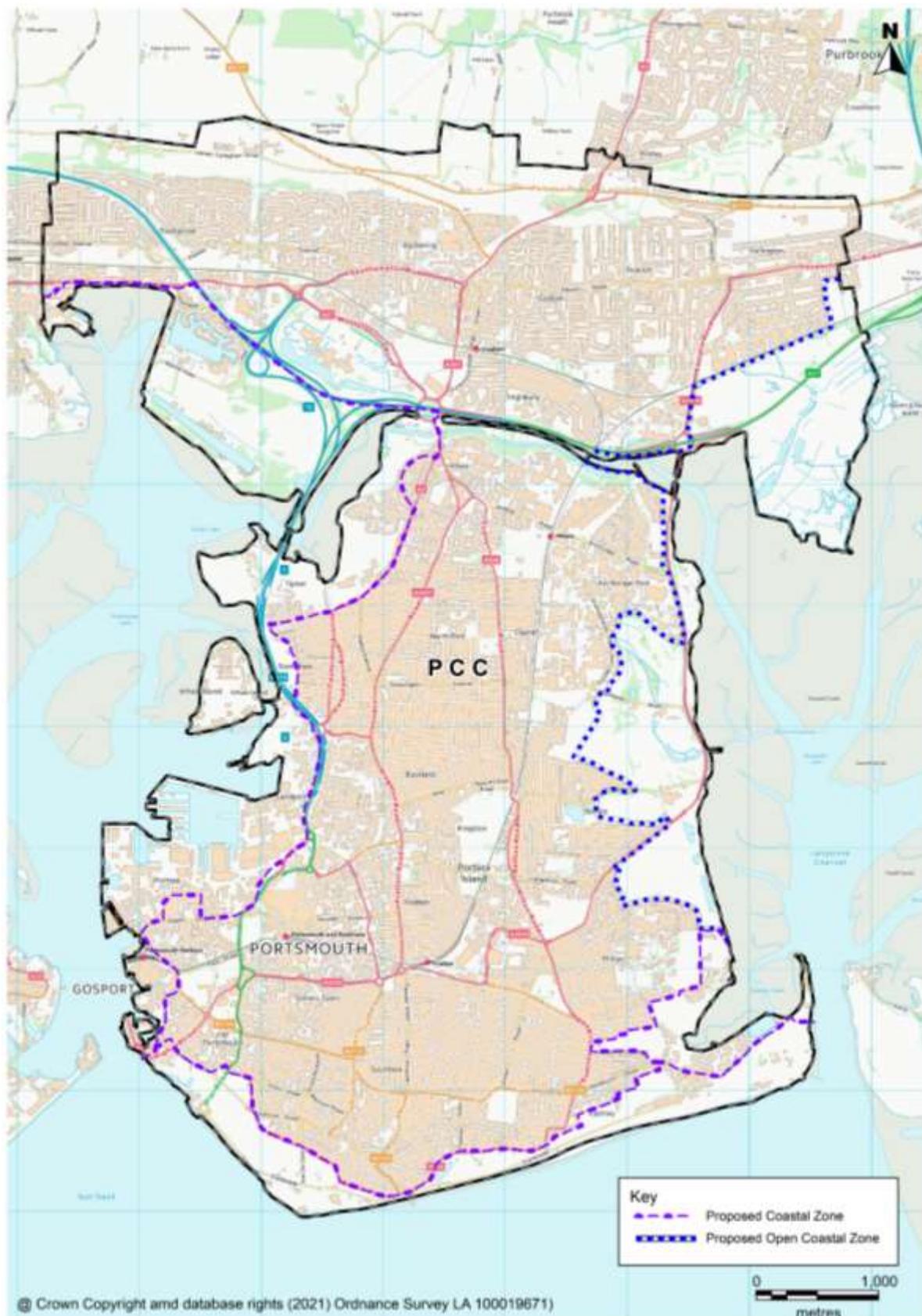
- Portsmouth City Council *Open Space Needs and Opportunities Assessment 2018 and 2020 Addendum*.
- HCC (2012) *Hampshire Integrated Landscape Character Assessment*
- PCC webpage on Portsdown Hill:  
<https://www.portsmouth.gov.uk/services/leisure/parks/portsdown-hill/>

#### 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 Partners<sup>115</sup>, 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

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<sup>115</sup> 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
<b>Manufacturing (particularly advanced manufacturing and engineering)</b>	<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 &amp; Maritime engineering and higher value manufacturing and R&amp;D.</p>	Decouple regional forecast decline (caused by increased automation and other wider sector declines) for local market.
<b>Transport and Storage</b>	<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>	
<b>Hospitality</b>	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
<b>Information &amp; Communications</b>	Policy objectives to increase knowledge-based sectors along with big-data analytics.	
<b>Professional, science &amp; technology</b>	Wide variety of advanced engineering services related to the marine and maritime industries with potential for growth, relates to innovation quarter.	
<b>Education</b>	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.	
<b>Arts &amp; Recreation</b>	Key priority growth sector and tied to a number of strategic objectives related to the visitor economy and culture-led regeneration	