

New Portsmouth Local Plan
'Regulation 18' draft consultation
(September 2021)

Consultation summary and response

February 2022

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i. Draft Policies Status Summary

Green	Amber	Red
Draft policy will remain largely unchanged/ minor amends only	Draft policy requires some amendments to take account of consultations comments/ decisions on options	Draft policy direction requires more substantive change

Draft Portsmouth Local Plan Chapter/ Policy		Status (Post consultation)
Portsmouth's Strategic Development Strategy		
	Vision and objectives	Green
	Key themes	Green
	Spatial Development Strategy	Green
Housing		
H1	Housing Need and Supply	Amber
H2	Housing Types, Mix and Affordability	Amber
H3	Houses in Multiple Occupation	Green
H4	Travellers and Travelling Showpeople	Amber
H5	Housing Density	Amber
H6	Residential Space Standards	Green
Economic Development and Regeneration		
E1	Economic Development and Regeneration	Green
E2	Employment Land Provision	Amber
E3	Culture and Tourism	Green
E5	Supporting Portsmouth's Town Centres	Green
E6	Town Centre Strategies	Green
Community and Infrastructure		
C1	Community and Leisure	Green
C2	Open Spaces and Outdoor Recreational	Amber
C3	Infrastructure and Community Benefits	Green
C4	Sustainable Transport	Green
n/a	Minerals and Waste	Green
Portsmouth's Environment		
G1	Biodiversity	Green
G2	Green Infrastructure	Amber
G3	Water Quality (Nutrient Neutrality)	Green
G5	Contaminated Land	Green
G6	Flood Risk and Drainage	Green
Sustainable Design & Heritage		
D1	Design	Green
D2	Sustainable Design and Construction	Green
D3	Pollution, Health & Amenity	Green
D4	Lower Carbon and Carbon Neutral Development	Amber
D5	Heritage and Archaeology	Green
D6	Heritage Enhancement	Green
Strategic Development Sites		
S1	City Centre and City Centre North	Amber
S2	Tipner	Red
S3	Fratton Park and the Pompey Centre	Green
S4	Cosham	Amber
S5	St James and Langstone Campus	Amber
S6	Lakeside Business Park	Green
Area Allocations		
S7	PCC Estate Renewal	Green
S8	The Seafront	Green
S9	Portsdown Hill	Green
S10	Coastal Zone	Green

1. Introduction

The Council is preparing a new Local Plan for Portsmouth. This document will set out a planning strategy to meet future development needs in the city for the period to 2038. The Plan will set out details on the level of development that will need to take place in the city and where it will be located. It will contain planning policies to guide decision making on planning applications.

The third preparation stage consultation ('Regulation 18') on the new Local Plan ran for six weeks from 17th September to 31st October.

Engagement and promotion of the Plan was through a mix of print, digital and in-person communications. In addition to the PCC website, a 'virtual consultation room' with multimedia functionality was set up to share the consultation documents with the public, present the main issues and the consultation questions and all supporting documents. Four public 'drop in' events were held across the city, a leaflet was sent to every household and a campaign of social media and posters were used to encourage participation. In accordance with the Statement of Community Involvement, the consultation was also advertised in the local newspaper and leaflets were available at all libraries and community centres. A phone line was also available for those who cannot engage through other methods.

The consultation resulted in thousands of comments from residents, stakeholders and interested parties, more than three times the number of responses received on the previous Local Plan consultations; 410 individual responses were submitted to the virtual room (6,016 comments), plus 71 email responses. In addition the Council received 8,995 proforma petition comments, coordinated by the Hampshire & Isle of Wight Wildlife Trust (HIWWT) and Royal Society of the Protection for Birds (RSPB) objecting to development at Tipner.

Some caution should be taken in considering the percentage of respondents who agreed/ disagreed with particular questions; not all consultees answered every question and some may have submitted a comment without answering the prior agree/ disagree question. The results are nevertheless very useful in indicating an overall view on a topic and the individual comments submitted provide valuable feedback.

2. Draft Vision, Objectives and Key Themes

Vision and Objectives

The 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.

1a. Do you agree with the use of the Imagine Portsmouth draft vision and objectives to lead the new Local Plan?	
	No. of respondents: 88
Yes	56
No	13
Not sure/don't know	14
1b. Do you agree with the proposed key themes?	
	No. of respondents: 50

1b. Do you have any further comments or suggestions about the use of the Imagine Portsmouth draft version and objectives?

While there was general support for the Imagine Portsmouth¹ vision and objectives, some found the details of the difficult to locate, too vague or complex.

There were considered to be some contradictions between the green aspirations for the city and proposals for development, such as development at Tipner. It was suggested that the Green city objective include reference to improving water quality and acknowledge biodiversity declines.

A housing focused objective was suggested given the dominant issue of the issue for planning in Portsmouth, to seek a sustainable balance for the constraints of the city and it was requested that addressing impacts of climate change (and reducing carbon footprint) should be given more prominence or made a priority objective.

Comments also wanted to see the following recognised: importance of good design, the critical importance of improving public transport to enable these aims, getting a 'good start' (youth and sure start services) and monitoring of health and well-being.

There were a number of comment relating to the spatial developing strategy for the city such as: opposing housing targets; the need to fully utilise other brownfield sites (other than Tipner); more high rise development in appropriate locations; preventing further student accommodation; and more community infrastructure instead of greater housing numbers.

Vision and Objectives - Council response

There is overall support for the vision and objectives with some concern on how these aspirations will be balanced.

Amendments can be made to include reference the issues raised, all of which fall within the overall objectives and the Local Plan's draft policies. Consideration will be given on how to best promote/ communicate the Plan's guiding vision and objectives.

Review Status: Green

¹ More information at: <https://imagineportsmouth.co.uk/>

Key Themes

The aim of the proposed 'key themes' was to highlight the major issues for the future of the city (in so far as these can be influenced by matters relating to the built environment) that could be more comprehensively achieved through integration throughout the Local Plan, rather than through a single issue policy.

2a. Do you agree with the proposed key themes?	
	No. of respondents: 80
Yes	53
No	8
Not sure/don't know	18
2b. Do you agree with the proposed key themes?	
No. of respondents: 46	

2b. Do you have any further comments or suggestions about the proposed key themes?

General support from consultees on these themes that will be fundamental for ensure high quality development and that capture the challenges that face the City.

A few respondees found them too vague or generic, lacking clear commitments, or unclear how they link to the overall vision. **Portsmouth Climate Action Board** commented that the key themes needs to be supported by agreed SMART carbon reduction targets for the city. Others thought they were ideal but unattainable for Portsmouth. The conflicts between air quality improvements and becoming a Freeport/ cruise ship destination were noted.

It was also suggested that the climate change theme should be the primary key theme, and that it could be amended to "Delivering Net Zero Carbon Emissions in Development Planning to Tackle Climate Change". Carbon capture and protection of existing carbon stores (such as wooded areas, grasslands and the Tipner West mudflats) should be included in this.

There were some alternative key theme suggestions, including: the need to support local business and the local community; supporting local people; economic growth; that environmental concerns (inc. air quality) should drive the whole Plan; to include reference to the biodiversity crisis; prioritising public transport; protecting heritage/ culture/ tradition or aesthetics; addressing flooding; protecting green space; education and youth provision; including air quality under the other themes; transport and air quality as a guiding theme; and the **RSPB and Hampshire & Isle of Wight Wildlife Trust** request that tackling the nature emergency and restoring ecological networks is a key stand-alone theme.

Key Themes - Council response

The inherent challenges of planning for sustainable development and addressing competing priorities within the constraints of the Portsmouth area are acknowledged in *Chapter 1.1. Portsmouth Profile*. All alternative/ additional key themes are very valid suggestions and have been largely covered by the specific draft policies in the Plan.

Further consideration will be given to how the key themes are presented/ strengthened and linked throughout the Plan. A definition of 'sustainable development' in the Portsmouth context and the links to wider sustainability goals could be added for clarity

Status: Green

Spatial Development Strategy

The draft Spatial Development Strategy seeks to guide the future location, pattern, and form of development in Portsmouth.

3a. Do you agree with the approach to the proposed Spatial Development Strategy for the new Local Plan?	
	No. of respondents: 80
Yes	26
No	18
Not sure/don't know	31
3b. Do you have any further comments or suggestions about the Spatial Development Strategy for the new Local Plan?	
No. of respondents: 59	

Hampshire County Council and Barton Wilmore on behalf of **PJ Livesey** and **NHS Property Services, Woodland Trust** and **House Building Federation (HBF)** broadly supports approach. The **HBF** does note that if the Council decides not to proceed with the full allocation at Tipner, it would need to consider where else housing could be met and the likely impact on the ability to address its needs for affordable housing and support the ambitious levels of economic growth outlined by both the Solent LEP and Partnership for South Hampshire. **Savills**, while supportive note that NPPF requirement for 30 year vision for large scale development, should be recognised for development at Tipner.

Comments, both positive and negative, emphasis that the need to protect green/ open space should be an overriding principle.

In terms of air quality, it was contested that the strategy proposed/ Local Plan policies would be able to address the existing levels of air pollution or improve health and well-being, citing that the requirement for Health Impact Assessment only addresses new development and the Clean Air Zone doesn't cover some of the worse affected areas.

Another key theme was the importance of transport link improvements for the success of the strategy. A more evident consideration of how those less able bodied or with SEND needs move around the city was also requested.

Comments from Stephen Morgan MP wanted to see an alternative approach to housing, believing that the Government set targets are unattainable, and seeking to meet them would produce an unsustainable pattern of development which would exacerbate existing socio-economic and environmental problems.

There were also some objections from other respondents due to either the proposed number of new homes or the additional of any new homes in the city (inc. student development), or due to the inclusion of particular proposed strategic site allocations. Particularly reference was made to negative consequences of additional homes on air pollution and pressure on green spaces and infrastructure. There were also some objections based on the perceived 'conflicts' within the spatial strategy e.g. protecting green space vs. proposing development on open space at Tipner and St James'/ Langstone campus.

Alternative suggestions received:

- Spatial strategy would ideally be led by the 15 min neighbourhood principle.
- Focus development strategy more on tall buildings given space constraints.
- More emphasis on regeneration opportunity at the seafront and specific sites (e.g. Fort Cumberland).
- Acknowledgement should be made of the allocations to enable needed sea defences (e.g. Tipner).
- Support Plan objectives through a "rail-loop" from the "Town" Station northwards to the Port and beyond to the mainland running alongside the M275 towards "Lakeside" and Cosham to join the mainline from Southampton/Bristol to Brighton.

Some respondents reported being confused by the proposed spatial strategy, including the terms and language used. A desire for further explanation and maps was expressed. It was considered that terms such as 'accessible' and 'sustainable development' should be defined in the context of the Local Plan. It was noted that some employment areas are missing/ less visible.

Spatial Development Strategy - Council response

The overall approach was largely supported, with some disagreement on 'guiding principle(s)' or objections relating to the proposed number of new homes. Minor amendments will be made for clarity, including the maps.

The proposed spatial strategy may need to be reassessed if there is any significant change to proposed strategic site allocations.

Review Status: Green (pending further assessment)

3. Housing

H1 Housing Need and Supply

Delivering housing to meet the needs of a growing city is a key requirement for the new Local Plan. 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.

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

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. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H1.

4a. Are there exceptional circumstances (to justify an alternate approach) for Portsmouth that should be considered?	
	No. of respondents: 133
Yes	115
No	11
Not sure/don't know	7
4b. If answered yes to 4a., please tell us more about these exceptional circumstances	
	No. of respondents: 120

The responses received in relation to Question 4b included the physical geography of Portsea Island and the constrained availability of development land as the main constraint. They also highlighted a variety of further issues caused by the lack of space, including traffic and parking problems, lack of infrastructure, including difficulty of accessing doctors and schooling. Potential pollution issues were also highlighted. The impact of further housing on the city's open space and environment were highlighted as a drawback from significant housing provision in a small area like the city. The government's target 'ignores our special circumstances'. The City is only 15sqm with a current housing stock of 89,800; a further 17,701 would increase the stock by almost 20%.

5a. Do you agree with the suggested approach to housing supply for the plan period?	
	No. of respondents: 123
Yes	26
No	71
Not sure/don't know	26
5b. Do you have any further comments or suggestions about the suggested approach to housing supply for the plan period?	
	No. of respondents: 90

The responses to Question 5b showed that there was a wide range of opinion on the best approach to housing provision in the city. Some felt that areas such as the City Centre and Tipner could accommodate more development, whereas others felt that there was too much development proposed (on the whole more people were concerned about Tipners environmental impact, whereas more people were supportive of the City Centre and increasing development there). Both increases and decreases in tall building provision were suggested, as well as increased and decreased levels of affordable housing. A number of site specific comments on small sites were given, and a general concern was shown for ensuring that sufficient infrastructure was provided to support the proposals.

In addition a number of specific email responses were received, these reflected the points received through the general consultation, and added a number of additional specific points:

Objections to the governments housing target, and indication that PCC should look to reject it due to exceptional circumstances:

CPRE Hampshire: For Portsmouth the difference in household projections is significant, with a much lower target from using the 2018 projections, only around 379 dpa, the City Council should use this as the basis.

Milton Neighbourhood Planning Forum: The proposal to build 17,701 new dwellings is excessive and unacceptable. As the Plan acknowledges, this is a Central Government's assessment of housing need and ignores local constraints and deliverability. There are in Portsmouth "Exceptional Circumstances" including its geography: its minimal size and currently highly "densified" and urbanised character; the congestion and pollution; the high levels of existing deprivation and the lower life expectancy rates; the Conservation of Habitats imposed by Statute and International Law; the extreme paucity of open-spaces; and the whole transport inefficiency in trying to access anywhere easily whether on foot, cycle or in a vehicle.

Climate change action group: The central government housing target is not suited to the geography and population density of our city for a number of reasons; There is a lack of land to build on and recreational pressure on the small amounts of green space; The city has over 20% of its area within Flood Zones 2 or 3; The Council should not be damaging protected sites in our harbours to add land mass. Given the Tipner West 'super-peninsula' proposals make up nearly 20% of the housing target it is apparent that the Council is unable to meet the Government's standard method calculations without causing serious environmental harm, including the substantial loss of designated habitats of international importance; The critical levels of air pollution in our city, mean we can't afford to add more pollution from private cars; We already have an acute lack of dentist, GP & hospital availability.

Portsmouth Labour Group: We reject outright the government's proposed housing targets for Portsmouth and believe there is a compelling case to be made that issues of land supply and environmental constraints within our local authority area justify a smaller target being included within the local plan. As an island city, Portsmouth has unique and obvious limits to the area available for development. Where brownfield land exists it should be allocated for significant development however green spaces

should be protected. In particular, areas designated as of substantial environmental significance, such as the Portsmouth Harbour Site of Special Scientific Interest (SSSI) should not be considered for development under any circumstances. The existing issues of nitrate and air pollution in the city mean that any development which exacerbates these problems should not be allowed. In addition any additional pressure placed on traffic and transport systems must be accompanied by a step change in the provision of green public transport and active travel infrastructure to enable reduced reliance on private motor vehicles.

Stephen Morgan MP: The Local Plan commits to Portsmouth to building 17,357 dwellings between 2020 and 2038, or 964 per annum. These inflated targets are totally unsustainable and bear no relation to the reality on the ground.

Ann Terry (resident) - Sewage discharge into the Solent is a health hazard and 17k new properties will only exacerbate an appalling situation.

Agree with the governments housing target:

Homes England: We welcome the Council's Draft Development Strategy and direction of growth to strategic sites in accordance with Figure 3 of the emerging Local Plan. Given, the undersupply of housing, however, with city boundaries we recommend modifications to draft Policies S5; draft St James and Langstone Campus and H5; Density to allow greater flexibility for optimisation of limited strategic sites and brownfield supply.

Bellway Homes: The emerging Portsmouth local plan should calculate housing need in line with government guidance and the standard methodology. Despite its constrained location, there is a clear need to build more housing in Portsmouth. Providing housing at the levels identified in Policy H1 will enable the City to continue to grow in a sustainable manner and provide both market and affordable homes to families and the wider community.

Savills for PCC strategic developments: The NPPF expects strategic policy-making authorities to follow the Standard Method for assessing local housing need, and it uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic undersupply.

Southern Housing Group: Welcome the ambitious and imaginative approach the Council have taken to the challenges of developing affordable homes sufficient to meet existing housing need and projected need of 17,701. We also acknowledge the real difficulties in developing on the island of Portsmouth and in delivering the proposed 16,933 new homes set out in the draft plan.

Persimmon Homes: Whilst there are no exceptional circumstances to justify a reduction in housing need the Council should consider whether further housing growth may be necessary in order to support the economic growth aspirations for the city and wider South Hampshire area, of which Portsmouth is a major driver of growth. It will be necessary for the council to consider, whether any growth deals or

infrastructure improvements planned for the area could lead to the need for a higher housing requirement than the minimum established using the standard method.

Commentary on the approach to calculating the number:

Eastleigh Borough Council - We note that the Partnership for South Hampshire (PfSH) is currently preparing a revised development strategy to cover an additional two year period up to 2036 which will identify an additional unmet housing need of c.13,000 new homes by 2036 across the PfSH sub-region. We further note that the Regulation 18 Consultation Document references that 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.

Southampton City Council (SCC): confirm its continued support for the development of the new Portsmouth Local Plan. Portsmouth plan to work with other authorities to deliver their housing supply with a potential contribution of 1000 homes supplied under the Duty to Cooperate, both unilaterally and through the Partnership for South Hampshire (PfSH). Whilst SCC's supply of housing sites is not yet finalised, the latest Statement of Common Ground (October 2021) indicates that Southampton is likely to have a significant unmet need and is working with other local authorities under the PfSH partnership to help accommodate any unmet need. As such, SCC would like to reiterate the importance of a coherent and interconnected approach to development across the Solent region and support the option of meeting supply through a cross-boundary distribution of housing.

Fareham Borough Council: pleased to see the ambition shown by the City Council in planning to meet its housing need. The first approach should be to exhaust all possible avenues to meeting the need. Fareham Borough Council awaits the outcome of the Partnership for South Hampshire work on cross boundary distribution of housing, but ahead of the publication of that work has committed to providing 900 dwellings (plus a buffer of 11%) towards sub-regional unmet need through the Fareham Local Plan 2037. The Borough Council notes that no mention is made in the Portsmouth Plan of where the Council envisages unmet need being located, other than a Partnership for South Hampshire contribution, but Fareham Borough Council is confident that the contribution of 900 (plus buffer) towards sub-regional unmet need is justified and evidenced, and that no more can be provided within the borough and that this approach will be found sound through the upcoming Local Plan Examination in Public.

Isle of Wight Council: IWC are currently planning for a housing number that is lower than the Government prescribed standard methodology for the island. This leaves an element of 'unmet need' which, through our Duty to Co-Operate discussions, we are exploring whether could be met in a sustainable way by any local authorities in areas that benefit from direct ferry connections. We note Table 2 on page 33 and Table 3 on page 35 of the document that highlight PCC will be seeking around 1,000 units of its identified housing need to be met from other local authorities within the PfSH area via other Duty to Co-Operate discussions. This re-iterates and confirms the position

that PCC set out in response to our own Draft Island Planning Strategy (IPS) Regulation 18 consultation, namely that PCC would be unable to make any contribution to meeting any unmet housing need from IWC, a position that is accepted and understood.

Winchester City Council: The Local Plan uses the 'Standard Method' to calculate its local housing need, which Winchester City Council supports. We are concerned by the addition of a 20% buffer in the first 5 years and 10% thereafter. This appears to be based on the application of NPPF paragraph 74 due to past under-provision against the Housing Delivery Test (paragraph 2.1.3, footnote 18) which we believe has been wrongly applied. We would wish to continue the discussion on housing need/ supply with Portsmouth City Council prior the Reg 19 stage of the Portsmouth Local Plan, in addition to the on-going collaborative work on sub regional housing need and distribution and other strategic cross boundary matters with the PfSH authorities. There would be benefit in both authorities positively working together to agree a joint Statement of Common Ground on housing need matters and other key issues prior to submission of our respective Local Plans.

Policy H1: Housing Need and Supply - Council response

The responses to the regulation 18 consultation have further highlighted the city's physical constraints and how it constrains the ability of the City to meet the targets as set out in the Standard Methodology.

The City Council needs to ensure that all potential options for housing accommodation have been considered, including all reasonable alternatives, in order to support a position which would not meet the full standard methodology requirement.

In preparation for its regulation 19 consultation the City Council carrying out the annual review of the Housing and Economic Land Availability Assessment to test the assumptions made for its housing land supply position, particularly the deliverability of the small site supply and the consultation comments received on the draft Strategic Sites. The Council is also continuing to work closely with its neighbours to see if any unmet need from the city can be accommodated outside of its boundaries.

The progression of this policy is linked to any changes in the supply position as the Plan progresses, including draft strategic sites, density proposals, planning permissions and completions and any contribution to the city's housing need through the Duty to Co-operate.

Policy Review Status: Amber

H2 Housing Types, Mix and Affordability

The 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. 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.

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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of specific questions related, to housing types mix and affordability, including the approach to family housing; self and custom-built housing; accessible and adaptable homes; older persons housing; specialist and supported housing; purpose Built Student Accommodation; Build to Rent; and affordable housing.

6a. Do you agree with the proposed approach to the provision of family housing; self and custom-built housing; accessible and adaptable homes; older persons housing; specialist and supported housing; purpose Built Student Accommodation; Build to Rent; and affordable housing.	
	No. of respondents: 873
Yes	494
No	139
Not sure/don't know	232
6b. Do you have any further comments or suggestions about the suggested approach to the provision of housing in Portsmouth?	
	No. of respondents: 86

A wide variety of comments were received. A number of people supported high rise as the most obvious way to provide more residences in a city with limited land area, however it was felt that the design of high rise buildings needed to be improved; need to provide more 1 /2 bed units; provision for the elderly; provision for travellers; more lifetime homes; quality retirement homes needed for people to downsize into; vehicle share schemes for flat residents; ensure environmental standards for new homes (zero carbon).

House Builders Federation - The policy as currently worded provides the level of flexibility we would expect to see in a local plan where there are significant constraints on development. Without sufficient flexibility policies on housing mix may prevent some sites from coming forward as the expectation from decision makers is that the prescribed housing mix should be met on all sites. However, as set out in paragraph 34 of the NPPF, the policies in a local plan should not undermine the deliverability of the development proposed in that local plan. Therefore, if, as indicated in the viability assessment, over half of the typologies tested are unviable at the proposed policy costs then the policies should be adjusted rather than rely on negotiation at the application stage. Whilst negotiation will be a

necessary fall-back position, as set out in policy H2, to ensure some sites come forward paragraph 58 of the NPPF makes it clear that this should be the exception not the norm and that decision makers should be able assume that where development meets all policy requirements in a plan then that development is viable.

Family housing:

General support with some reservations about the availability of land of sufficient extent to provide the 57% of new family homes desired.

Portsmouth Labour Group - support the requirement for an appropriate share of family sized homes on new developments and emphasise the need for robust enforcement of this part of the policy, particularly on council and housing association led schemes where this is not currently always the case.

PJ Livesey and NHS Property Services - the draft policy to seek a proportion of family housing on development sites (3+ bed) is supported, as is the flexible nature of the policy which would allow the final housing mix to be negotiated on a site by site basis.

WSP - Flexibility for provision of family housing should be provided when undertaking conversions of existing buildings to residential properties. In these instances, it is often not possible to provide family housing and in such cases the provision of one and two bed flats should be accepted. Request an amendment to the policy for conversions of existing buildings.

Self Build and Custom Housing:

Supported in principle but with some concern from housing industry on deliverability.

House Builders Federation - The significant constraints on development opportunities within Portsmouth and the higher densities that may be required indicate that there must be flexibility in how self-build home plots are delivered and not place unnecessary burdens on development.

Bellway Homes - difficult to achieve in the City Centre and on proposed high density redevelopment sites (such as Tipner East), and the necessary housing density as required by local policy in general as it will be necessary to provide a significant proportion of residential units as flats. There should be an exception to the policy on this basis.

Portsmouth Labour Group - support enabling of self-build and custom-build housing and encourage the local authority to consider allocating resource to looking at Community-led Housing schemes as a way of taking this, and affordable housing development more generally, forward.

Accessible and Adaptable Homes

Draft policy proposes 20% of all new homes are built to part M4(2) and 5% of built to part M4(3).

PJ Livesey and NHS Property Services - support the proposed approach in meeting the needs of the community and note that the proposals for St James's hospital site can support these aspirations.

House Builders Federation With regard to the evidence of need for the application of the higher 20% standard for M4(2), the Needs Assessment states that for current households where needs are affected by illness or disability only 9% are likely to need to move to a more suitable home. To therefore conclude that in future over half of those whose needs are

affected by a disability or illness will need to move to a more adaptable home does not seem to be a robust or consistent assessment. However, agree with the Council's proposals of 20% of new housing to be delivered as part M4(2) (rather than 46%) which would seem a reasonable approach in view of the evidence and the broader concerns with viability in Portsmouth. With regard to M4(3) the Council will need to make the distinction between a wheelchair adaptable homes and wheelchair accessible home under part M4(3), as the PPG states that wheelchair accessible home can only be required through the local plan where the council has nomination rights for that house.

Portsmouth Labour Group - support the accessible and adaptable homes part of the policy and again emphasise the necessity for robust enforcement of this.

Older Persons/ Specialist and Supported accommodation:

McCarthy and Stone - The plan does, not plan positively for older persons accommodation, identified needs for specialist housing are not included as targets and the assessment is from 2019; a more thorough and up to date assessment is needed.

House Builders Federation - local plans should look to allocate specific sites to meet the needs of older people as a commitment to maintaining a supply of land to meet targets, in the most sustainable locations close to key services. Also consider identified needs/ a target should be included in the policy Portsmouth. This would ensure needs are met over the plan period, effective monitoring of this target and encourage positive decision making if there is a deficiency in supply.

Vail Williams - also note that Council has not sought to identify specific quantum of persons or specialist/supported housing that could be required. There should be detailed policy provision for the following, with a requirement to be located close to local facilities, services and easily accessible to sustainable transport:

- Community accommodation for mental health patients and other vulnerable people.
- Accommodation for mental healthcare services.
- Affordable housing for healthcare staff, from both UK and abroad.
- Key worker housing.

Portsmouth Labour Group - support approach relating to elderly, specialist and supported housing as a way to ensure there are housing options appropriate for everyone.

Student Accommodation

Many of the comments on student housing felt there is already sufficient student accommodation in the city and it was considered important such development could be repurposed for a different use if necessary.

Portsmouth Labour Group - propose an additional clause is added to the part of Purpose Built Student Accommodation to read: "New development will only be supported where a clearly identified and evidenced need has been proven."

House Builders Federation - important to ensure that there is a robust assessment as to how many bed spaces in student accommodation it will take to release one home, accommodation if this is to be included in overall supply. Use of the position set out in the Housing Delivery Test Rule Book it is a national average and the ratio is likely to differ between areas. In some Local Planning Authorities, the density of students per housing is likely to be significantly higher and will require far more bed spaces to free up one house. As

such the Council should have robust evidence to support its approach in assessing the level of housing freed by student

Union for Planning - graduates/ young professionals wanting to stay in the area where they have trained or attended university, or move into the area, but do not have the financial ability (or desire) to purchase market housing, but also require additional independence and autonomy which would not be achieved through living in a house share. As such, Co-Living is an ideal product for such groups. Request that support for this tenure is included in the wording of policy H2 (as it is in the preceding paragraphs).

Affordable housing (inc. Build to Rent)

There were both comments supporting more and less affordable housing contribution, both on and offsite for developers, however there was general support for the provision of more generally affordable housing, which is seen as Council built, owned and run stock, rather than other 'affordable' tenure types; more affordable housing of a kind similar to Council housing built in the past; local connections for housing raised. Provision of "Affordable homes should not be as easily circumvented by "Viability Exclusions" because it raises "Hope Value" to landowners and starts the whole avoidance or scaling down of delivery.

Build to Rent ' schemes are a 'double edge sword'; unless more is done to CAP excessive rent charges and service charges and to prevent greedy landlords and housing agencies could end up making this problem a lot worse.

Portsmouth Labour Group concerned that the Build to Rent element of the policy will be used by developers to circumvent provision of social/affordable rented affordable housing and encourage the Local Planning Authority to look at all options for minimising this possibility.

6c. Considering the conclusion of the Viability Assessment of the Local Plan there is a risk that the proposed 30% requirement for affordable housing (which would potentially be viable for less than half of expected developments in Portsmouth), is undeliverable.	
Due to this risk, is there an alternative requirement for affordable housing provision that should be considered?	
	No. of respondents: 106
Yes	37
No	14
Not sure/don't know	54
6d. If answered yes to Q6c., please tell us more about what you think this requirement should be.	
	No. of respondents: 52

Out of 49 respondents to Question 6d, 11 responses specifically mentioned a percentage target, of these 6 though it should be lower than 30% affordable housing with the majority saying the requirement should be 20%. 5 responses said 30% affordable housing or Higher, with the highest suggested being 50%. None suggested it should be less than 20%. Many of the responses felt that there was too much flexibility for developers to not pay at all, and that assessment of viability work submitted needed to be robustly assessed. The need for genuinely affordable homes was in many of the comments, with questions being raised asking if first homes were truly 'affordable'.

6e. Due to the national requirement to provide 25% of new affordable homes as 'First Homes' and the viability challenges in Portsmouth, the proposed tenure split is of 70% affordable rent and 30% low-cost home ownership (incorporating the 25% First Homes requirement) what tenure split do you believe is most appropriate for Portsmouth?	
	No. of respondents: 103
The proposed split of 70% affordable rent and 30% low-cost home ownership is appropriate.	47
Less affordable rent and more low-cost home ownership	38
Less low-cost home ownership and more affordable rent	14
Not sure / other comment	4

Bellway Homes the policy should be altered to reiterate that the First Homes requirement should not apply to planning applications and housing sites which obtained planning permission (or where a right to appeal against non-determination has arisen) prior to 28th December 2021 and/or applications determined before 28 March 2022, provided that there has been significant pre-application engagement.

Portsmouth Labour Group - delivery of affordable rented accommodation for those in greatest housing need should be maximised. In addition it is important that this tenure split is actually enforced. The research on Shared Ownership and Help to Buy has found that most people accessing those schemes are on middle and higher incomes and therefore the benefits to those most in financial need are unclear. In fact these schemes arguably contribute to further inflating house prices, and First Homes seem likely to continue this trend.

National and Regional Property Group - The affordable tenures proposed within policy H2 as part of the 30% on-site affordable housing requirement do not appear to have been tested by the evidence base. First Home tenures have a notably different cashflow profile when compared to traditional affordable housing tenures and will result in higher development finance charges, thus increasing overall development costs and negatively impacting viability. The true impact of First Homes, including a diluted sales market, does not appear to have been openly and transparently tested by the evidence base. Under the provisions of First Homes, the developer will bear 100% of the sales and build risk.

House Builders Federation - the impact of the requirement to provide First Homes as an affordable housing tenure does not appear to have been fully considered in the supporting Viability Assessment. First homes are fundamentally different to a shared ownership unit or affordable home for rent where the home is bought up front by a housing association with the developer in affect acting as a contractor. The risk is lower as there is no need to put the affordable home on the open market, as such the developer accepts a lower level of profit. However, a First Home would be sold by the developer and as such they retain the risk and the other costs, such as marketing, in the same ways as they would for any home sold on the open market. Therefore, the proportion of new homes delivered as First Homes should be treated in the same way as other market homes for sale. The Council's approach would result in 9% of homes on a major development site as affordable home ownership product which is below the level required by national policy. In order to ensure that 10% of homes come forward as low-cost home ownership products the tenure split should be 65:35 rent to home ownership.

Support for 30% affordable housing threshold:

Portsmouth Labour Group strongly support the retention of the requirement of 30% affordable housing on all large developments and encourage the Local Planning Authority and Housing Enabling Officer to continue doing all they can to maximise the delivery of affordable housing across the city. We would support a significantly higher minimum affordable requirement on sites owned by the council.

McCarthy and Stone - With regard to the proposed affordable housing policy, the ability for applicants to submit an open book viability assessment where schemes do not meet the 30% affordable housing requirement is supported. This is necessary in order to ensure that the plan does not undermine the delivery of much needed housing and for individual circumstances to be accounted for.

Support for 20% or an alternative affordable housing threshold:

Abri homes - the 20% affordable housing target recommended by the Viability Study is very low compared with the overall needs, and the Council's proposed raising of this threshold to 30% is welcomed as a sign of its support for delivery. However, this approach does not reflect the NPPF and PPG guidance that plan-making should be the 'last word' in viability testing, presenting realistic policies that will not cumulatively undermine deliverability: *Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.* PPG, Para. 002 Ref. ID 10-002-20190509

House Builders Federation - considering the conclusion of the viability assessment of the Local Plan there is a risk that the proposed 30% requirement for affordable housing (which would potentially be viable for less than half of expected developments in Portsmouth), is undeliverable. This would therefore require frequent case by case viability testing. Due to this risk, they ask whether an alternative requirement for affordable housing provision should be considered. National policy and the Council's evidence would suggest that the affordable housing policy be amended to 20% in line with the recommendations in the viability assessment.

National and Regional Property Group - Policy H2 does not conform with the recommendations made by the evidence base. The evidence base suggests that, based on current Community Infrastructure Levy (CIL) rates, a lower affordable housing target of 20% should be sought for schemes in high and medium value areas within the city. The evidence base concludes that sites in lower-value areas, and schemes of 6+ storeys, should have the ability to test site-specific viability. Consequently, the benchmark threshold of affordable housing within viability testing is 10% higher in emerging policy H2 for sites located within medium and higher value areas, and up to 30% higher for sites in lower value areas when compared to recommendations made by the evidence base.

Bellway Homes - we support the approach in the consultation draft of setting a more challenging target, but our concern remains that the plan will not facilitate the delivery of sufficient affordable housing to meet local need. The viability review shows that sites in many areas of Portsmouth, including the City Centre, will not be viable if they make provision for 30% affordable housing.

Southern Housing Group - The viability review shows that sites in many areas of Portsmouth, including the City Centre, will not be viable if they make provision for 30% affordable housing.

Persimmon Homes - Policy H2 proposes that the provision of affordable housing should be 30%, unless otherwise agreed by the Council. Paragraph 34 of the NPPF states the policies in a local plan should not undermine the deliverability of the development proposed in that local plan. The Draft Plan policies should be adjusted rather than rely on negotiation at the application stage. National policy and the Council's evidence would suggest that the affordable housing policy be amended to 20% in line with the recommendations in the viability assessment.

Further comments on the supporting evidence:

House Builders Federation - are concerned that the viability evidence does not full reflect the costs associated with delivering residential development in Portsmouth. The viability study uses the lower quartile BCIS build cost in relation to development in Portsmouth; the median would better reflect the cost of development moving forward in Portsmouth given the focus of Government on high quality design. Not all policy costs seem to have been included in the viability assessment; e.g. the costs of Council's electric vehicle charging requirements that Policy C3 states will be set out in the Parking and Transport SPD. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks. Under the Government's proposals should such upgrades be higher than £3,600 per EVCP then the delivery of charging points is not considered to be technically feasible. HBF believe the 5% allowance for abnormal costs is insufficient. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019, NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, this option is now significantly restricted by paragraph 58 of the NPPF, and it is necessary for abnormal costs to be factored into whole plan viability assessment; they are often substantial and can have a significant impact on viability. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. Abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable. If abnormal costs are high then it will result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. A significant buffer should be identified within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the plan will come forward without negotiation.

National and Regional property Group- Policy H2 does not conform with the recommendations made by the evidence base. The evidence base suggests that, based on current Community Infrastructure Levy (CIL) rates, a lower affordable housing target of 20% should be sought for schemes in high and medium value areas within the city. The evidence base concludes that sites in lower-value areas, and schemes of 6+ storeys, should have the ability to test site-specific viability. Consequently, the benchmark threshold of affordable housing within viability testing is 10% higher in emerging policy H2 for sites located within medium and higher value areas, and up to 30% higher for sites in lower value areas when compared to recommendations made by the evidence base. It is evident from Table 10.2a, page 142 of the evidence base, that for higher value areas, all 'high density' and 'very high density' sites, including those tested against a higher Benchmark Land Value of £2m per hectare, will not be able to deliver full policy requirements based on the consultant's development assumptions. Furthermore, with reference to the Housing and Economic Land Availability Assessments (HELAA) 2021, high density sites of between 3 - 120 dwellings, totalling approximately 480 dwellings and could come forward within high and medium value

areas across the city over the plan period as well as other typologies listed (Table 10.4, page 146) These sites will be subject to unnecessary time and cost delays associated with site specific viability testing. The modelling within the evidence base also shows that low density sites within medium value areas of between 12 - 50 dwellings will not be viable when full policy requirements are assumed. Only 11 of the 51 sites identified in the HELAA could come forward with 30% onsite affordable housing assuming CIL at £157.26, Section 106 at £5,000 per unit, 20% Part M-2 and 10% Part M-3, Future Homes Standard – Option 1 and Water Measures.

There is no ability to site-specifically test the 20% on-site provision of affordable rented dwellings required for Build to Rent schemes across the city. Numerous site-specific viability cases have established that Build to Rent schemes face genuine viability pressures, with a number of consented Build to Rent schemes delivering reduced levels of onsite affordable housing across the south. Whilst the PPG states that “20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme” the guidance goes on to say that “guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark” (PPG: 60-002-20180913). This exception should to be captured within policy H2 wording.

The Build to Rent development assumptions made within the evidence base, a capitalised blended average value of £2,560 per sq. m, is more akin to the capitalised rental income of wholly two-bedroom flatted schemes, as opposed to the housing mix actually being delivered and sought by PCC. The Draft Portsmouth Local Housing Needs Assessment October 2019 includes approximately 15% smaller, less valuable one-bedroom units.

In practice, Build to Rent schemes within the city are delivering approximately 22% one-bedroom units (19/01919/CS3) and emerging schemes include a percentage of smaller studio apartments in addition to one-bedroom flats. These less valuable tenures have been omitted from the modelling. Consequently, they believe the gross development value of Build to Rent schemes within the evidence base is overinflated.

Policy H2: Housing Types, Mix and Affordability - Council response

- A number of specific points raised that may need to be considered further:
- There seems to be support for well-designed High-Rise development, should the density / design polices look at this in more detail?
 - Can the City Council build more Council housing? Where is our affordable housing going to go?
 - Can the evidence be derived to support an approach that would limit student housing?
 - Is the 30% affordable housing target appropriate given the viability evidence?
 - Is the proposed first homes approach appropriate?
 - Are the assumptions underpinning the build to rent position correct?

Policy Status: Amber

The Council will consider the conflicting views on an appropriate affordable housing requirement and whether there is sufficient evidence to justify the proposed affordable housing position. The viability evidence that the Council has commissioned will need to be revisited to ensure that the preferred approach to affordable housing proportions is acceptable, and to take account of the latest guidance from national government.

The Council will look to update its Housing Needs Assessment to ensure the regulation 19 position is fully supported and in line with national government policy and takes account of the points raised in the consultation responses above. Further specific evidence will be sought where necessary to clarify the proposed positions including viability testing of the First Homes requirement introduced by the Government in April 2021.

H3 Houses in Multiple Occupation

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'.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 wellbeing with a high standard of amenity for existing and future users.

Policy H3 sets the criteria for considering applications for new HMOs including a requirement that less than 10% of residential properties within a 50m radius of the area surrounding the application property are in existing use as a HMO.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H3.

7a: Do you agree with the proposed approach to the provision of the Homes in Multiple Occupation in the city?	
	No. of respondents: 106
Yes	52
No	31
Not sure/don't know	23
7b. Do you have any further comments or suggestions about the suggested approach to the provision of the Homes in Multiple Occupation in the city?	
	No. of respondents: 55

There were varied opinions received in relation for Question 7b., some responses felt that there were already too many HMO's in the City many responses said they were an essential part of the options for housing for people available in the city. There were some questions asked on the rationale for the 50m standard and other rules on HMO proximity. It was felt by some that the Council's approach to HMO's needed to be more positive and that purpose

² 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.

built HMO's combined with other facilities in the same way that student blocks could be beneficial.

Many respondents felt that better regulation of HMO's was needed with space standards, and other amenity standards more rigidly enforced. Overall, it was felt that more control to ensure the standard of living for HMO residents was needed. The impact of HMO's was mentioned with parking being the most commonly mentioned potential issue as well as noise and anti-social behaviour for other residents.

Portsmouth University - PBSA that is appropriately located and well-managed plays an important role in the health and well-being of students and a key component in the wider attraction and offer of the University. However, if such accommodation is positioned in the wrong location and is either unaffordable, of an inappropriate design or quality and/or poorly managed then that adversely affects the health and wellbeing of students. HMOs are an affordable type of housing that is affordable for many students and should be supported, any policy wording that would further restrict the creation of HMO's will likely be detrimental to the availability of this type of affordable housing for students and limit the choice and options available to students for affordable rented accommodation.

Portsmouth Labour Group - propose that a policy presumption against HMOs in certain parts of the city be included in the local plan. It is clear that in particular areas of Portsmouth there is already an existing imbalance resulting from overconcentration of HMOs. This is something that should be included at this stage rather than a suggestion that it be looked at in future.

Policy H3: Houses in Multiple Occupation - Council response

Overall the proposed approach had more support than opposition. Responses highlight areas for clarification and questioned whether where the Council go further on standards for HMO's, either through planning and or its wider role. The Council will investigate the following questions further:

- the Council's stance on purpose built HMO's
- whether further guidance is needed through either planning or licensing to ensure the standard of living for those in HMO's

The overall approach of the draft policy will largely unchanged but subject to some additional information/ clarification as per the above

Policy Status: Green

The Council will revisit the HMO Policy to take on board the points received and make any points of clarification necessary. The Council will look to update its HMO SPD and licensing guidance on a regular basis to take account of the latest position / information on HMO's in the city.

H4 Gypsy, Travellers and Travelling Showpeople

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. 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.

Policy H4 is a criteria based policy that will be required to assess any planning applications received and/or any new accommodation needs that arise during the plan period.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H4.

8a. Do you agree with the proposed approach to Policy H4?	
	No. of respondents: 104
Yes	42
No	26
Not sure/don't know	37
8b. Do you have any further comments or suggestions about the suggested approach to the provision for Gypsies, Travellers and Travelling Showpeople Accomodation?	
	No. of respondents: 43

A large number of comments received in response to Question 8b, relate to the lack of need within the city and suggest the Council updates the evidence on this. The **Environment Agency** has questioned point 3 of the policy suggesting that it should be Flood Zone 3 rather than the current Flood Zone 2. There were some comments relating to why we should provide sites for Gypsy and Travellers.

Policy H4: Gypsy, Travellers and Travelling Showpeople - Council response

As a Council we have a statutory duty to ensure that the Gypsy, Travellers and Travelling Showpeople communities have suitable sites within the City, and is there is an identified need for a site within the city this policy would seek to ensure the site would be suitable.

The Council will review the Portsmouth Gypsy and Traveller Needs Assessment to ensure the current Gypsy, Travellers and Travelling Showpeople with the latest data and assess if the outcome has changed to a material degree. Recent unauthorised encampments within the city may not necessarily mean there is strategic need for a site provision. Criteria 3 will be reworded to reflect the Environment Agency's comments changing Flood Zone 2 to Flood Zone 3.

Minor amendments will be made to draft policy and evidence base will be updated as to reflect the comments received as necessary.

Policy Status: Green

The Council will look to update its current Gypsy and Traveller Needs Assessment to ensure it takes account of the most appropriate assumptions in regard to Gypsy and Traveller Needs provision, and ensure the Council's statutory duties are being met.

H5 Housing Density

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.

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.

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.

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. The policy proposes that the city area is divided into three broad density zones with an appropriate minimum density.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H5.

9a. Do you agree with the proposed approach to Policy H5?	
	No. of respondents: 113
Yes	45
No	45
Not sure/don't know	21
9b. Do you have any further comments or suggestions about the suggested approach to the density of new homes in the city?	
	No. of respondents: 77

Many of the comments received in response to Question 9b raised concerns with the high density being proposed in the draft policy on an island which is already one of the most densely populated areas outside on London. There is also significant objection to the Tipner development being located within the highest density zone. Some respondents also raised concerns of the impact on air quality and traffic in particular within the highest density zones.

Historic England have also objected to the policy suggesting that part of the policy should be rewritten, firstly to acknowledge that there is a wider range of factors than urban design such as impact on the setting of Historic Assets, that could indicate that density should be moderated. Secondly, the policy should make clear that it will be for the local authority to determine when departures from the minimum densities are appropriate, rather than being framed in terms of a justification by the applicant. Historic England's view is that in most cases applicants would argue for higher densities and this should be acknowledged in how the policy is written.

Policy H5: Housing Density - Council response

Increasing the density of residential density in the city will help Portsmouth meet its housing need and may help to ensure that developments are viable. Focusing high density development in more accessible areas should encourage less private car

use and should therefore have positive impacts in terms of air quality and emissions. The policy will be amended to address the concerns of Historic England where appropriate.

Comments received on the appropriateness of the proposed density zones will be considered as part of the update of the Housing and Employment Land Availability Assessment (HELAA) which will in turn inform this policy. Density assumptions for key sites or areas may need to be revisited and decisions regarding housing supply for the plan period may also necessitate changes to this policy

Policy Status: Amber

The Council will consider the proposed policy position against the need for housing which are driven by top-down targets from central government through the Standard Methodology, the density policy will be adjusted in response to that position and the comments received in response to reg 18.

H6 Residential Space Standards

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.

Policy H6 aims to address overcrowding of properties and increase the number of people living in decent sized homes in the city.

10a. Do you agree with the proposed approach to Policy H6?	
	No. of respondents: 105
Yes	68
No	11
Not sure/don't know	26
10b. Do you have any further comments or suggestions about the suggested approach to space standards for new residential developments?	
	No. of respondents: 36

Overall a majority of the comments received in response to Question 10b were supportive of the policy though a small number are sceptical how it will ensure office to residential development complies with these proposed space standards. The **House Builders Federation** has suggested a minor amendment as they feel that the draft policy in its current form is not flexible enough to allow development which fails to meet the space standards but are well designed and needed.

Policy H6: Residential Space Standards - Council response

The key role of this policy is to address overcrowding of properties and increase the number of people living in decent sized homes in the city. The Council has limited control over permitted development rights such as changes of use from office to residential but can consider some amenity considerations the Council will also

continue to work with proactively with applicants to ensure standards are met where possible.

Minor amendments/ clarifications to the policy/ explanatory text will be considered in light of the comments received.

Policy Status: Green

The Council will look to take on board the responses received to regulation 18 and make changes accordingly.

4. Economic Development and Regeneration

E1 Economic Development and Regeneration

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 wellbeing improvements.

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. Policy E1 seeks 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 Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E1.

11a. Do you agree with the proposed approach to Policy E1?	
	No. of respondents: 48
Yes	34
No	11
Not sure/don't know	4
11b. Do you have any further comments or suggestions about the suggested approach to economic growth and regeneration?	
	No. of respondents: 42

Overall the majority were supportive of the approach policy with most of the non-supportive comments relating to the proposed employment allocation at Tipner. There was strong support for a sustainable growth and low environmental impact focus and the need to address air quality issues from Port related activity, including the Gunwharf ferry port.

Comments on the proposed approach included request for details on some areas e.g. on how specifically the city's economic weaknesses (finance and technology sectors or the comparative low skill / low pay economy) would be addressed or how low carbon outcomes would be achieved.

It was requested that is reference added to creative industries sector, the NHS as a major employer (QA and St Mary's), greater provision for young people and potentially

encouraging clustering of 'low carbon' focused businesses. Some concern about commuting congestion of extra 7,000 jobs and the need to ensure the new are jobs for all. There was also a request that the Council offers a suitable site to any businesses forced to relocate due to growth and regeneration proposals.

Regenerating older facilities and unused retail space for greater employment use was suggested, as well as promoting the assets of Portsmouth to attract business.

Southampton City Council supports the protection of all marine employment and maritime industrial land. They have mirrored this approach in Southampton in order to provide a consistent and unified approach across the Solent region

Policy E1: Economic Development and Regeneration - Council response	
There is a fine balance between encouraging economic growth across the city yet also ensuring that the environmental impact is minimised. There are numerous policies within the draft plan which ensures that all development must be sustainable and will be used in conjunction with Policy E1.	
Policy Status: Green	
The council will take into consideration all the comments made in relation to Policy E1 and make any necessary changes to the policy in order to fully conform with national policy.	

E2 Employment Land Provision

This policy of the Draft Local Plan 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.

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. 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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E2.

12a. Do you agree with the proposed approach to Policy E2?	
	No. of respondents: 51
Yes	27
No	10
Not sure/don't know	14
12b. Do you have any further comments or suggestions about the suggested approach of the draft Policy E2?	
	No. of respondents: 37

Overall the respondents to Question 12b were supportive of the approach to Policy E2. The Policy currently identifies 60,000 m of mixed employment uses as part of one of the options

for development at Tipner, some respondents (inc. **Natural England**) oppose large scale employment at this site primarily due to the environmental impact.

There were comments regarding the projected need for office space and that it ought to be recognised that need for office space is likely to decrease with greater working from home in future. **Southampton City Council** are of the view that any office proposals which would lead to an over provision of office space against assessed need or an agreed target for the city for a particular phase of the plan should be subject to a sequential assessment of whether there are any sites in neighbouring authorities, including Southampton city centre.

It was suggested that increasing the density of employment use in existing employment areas, which were thought to be underutilised, should be encouraged inc, unused/ MoD land in Eastney. Other employment site suggestions include identifying Port Solent as an employment area, retaining employment space at Fratton due to the lower employment land provision in the southern part of the city and identifying employment areas in all city neighbourhoods to create true mixed use neighbourhoods. It was also suggested that employment areas/ boundaries are reviewed to consider uses around designated employment areas e.g. Vanguard site near the Port.

The **University of Portsmouth** request acknowledgement of the role it can play in contributing adding value to various industries and to knowledge related sectors.

Portsmouth International Port request greater support from the Local Plan to enable the Port's needed growth and expansion through allocation of land outside the Port for their use, suggesting the land parcels adjacent to the Rudmore Square junction currently occupied by the Lock n Store and Peninsular House office and the 'tear drop' site off the M275 situated adjacent to Port Solent

Other broader suggestions including focusing the advantage of being an island city, particularly through facilities to support watersports and recreation, encouraging investment in the city centre and the M27 corridor and supporting flexible terms and reasonable rents to help support new businesses. There are also some suggestions that the policy should be more proactive in encouraging greener more sustainable employment opportunities within the city (e.g. green innovations areas/ estates) with details on how carbon emissions will be minimised and measured.

The approach to employment land should be integrated with sustainable transport (e.g. 15 min neighbourhoods) and monitoring of how people travel to key employment locations. It was noted that some of the industrial estates aren't well served by public transport e.g. Anchorage Park.

Policy E2: Employment Land Provision- Council response

The Council will be undertaking a full update to the Housing and Economic Land Availability Assessment (HELAA) including a Call for Sites and reassessment of the small site deliverability. The outcomes of this assessment could affect the provision of new employment proposed in Policy E2 and other options may need to be considered. The objections to employment land at Tipner as part of a significant regeneration scheme are noted.

While the Portsmouth International Port is of strategic importance to the local economy, there are constraints on the amount of land available and competing needs for redevelopment opportunities. Land in proximity to the Port will be considered for employment use where is appropriate and deliverable. It is

anticipated that the work supporting the new Port Masterplan will provide evidence of the Port's industrial land need for the plan period.

Amendments will be made to the policy in-line with the comments received, outcome of the HELAA work and subject to further evidence from the Portsmouth International Port's masterplan.

Policy Status: Amber

The council will take into consideration all the comments made in relation to Policy E2 and make any necessary changes to the policy in order to fully conform with national policy.

E3 Culture and Tourism

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

Policy E3 seeks to protect and enhance Portsmouth's existing attractions 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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E3.

13a. Do you agree with the proposed approach to Policy E3?	
	No. of respondents: 47
Yes	34
No	8
Not sure/don't know	5
13b. Do you have any further comments or suggestions about the suggested approach of draft Policy E3?	
	No. of respondents: 32

Overall the comments relating to Policy E3 were positive though some feel that the protection of cultural and tourism facilities should extend beyond the list of sites and areas currently listed within the policy. Suggestions include Wymering Manor, Hilsea Lido, Forts Widley and Purbrook in the north of the City, the seafront, music venues and art galleries, Langstone harbour frontage,

Other comments included the need for more hotels, greater use of vacant buildings and meanwhile uses and including additional focus on the economic benefits of the creative economy/ cluster. It was noted that such enhancements are dependent upon adequate transport infrastructure and there should monitoring of how people get to these venues. The conflict with the need to reduce air pollution and potentially encouraging more vehicle trips to the city needs to be addressed.

Historic England has also suggested additional wording to ensure that proposals in sensitive areas, such as conservation areas, consider their impact.

E3 - Culture and Tourism - Council response

Overall the policy has been well received and some minor amendments may be made to strengthen the policy's overall aims in particular with regards to sensitive areas of the City such as Conservation Areas. The current list of sites seeks to protect the strategic cultural and tourism assets, other community facilities are safeguarded in Policy C1.

The council will take into consideration all the comments made in relation to Policy E3 and make any necessary changes to the policy in order to fully conform with national policy

Policy Status: Green

The council will take into consideration all the comments made in relation to Policy E3 and make any necessary changes to the policy in order to fully conform with national policy.

E4 Supporting Portsmouth's Town Centres

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.

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 main town centre uses and activity in existing town centres.

Under current planning guidance the Local Plan must also consider the need for new 'main town centre uses' (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 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

Policy E4 establishes the Portsmouth defined town centres as the preferred locations for new main town centre uses. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E4.

Question 14a: Should the Council seek to regulate future changes of use for town centre development where possible?	
	No. of respondents: 46
Yes	36
No	5

Not sure/don't know	6
Question 14b: Do you have any further comments or suggestions about the regulation of future changes to use of town centres?	
	No. of respondents: 31

The responses received in relation to Question 14b include: future development needs to be sympathetic to the city's history; impact of Covid-19 and demand for new retail; poor quality environment of City Centre/Commercial Road, and suggestions on future uses such as housing, culture, leisure, F+B, public services, etc; opportunity to create new neighbourhoods and communities; need to support buying local and provide local amenities; need to improve active/sustainable transport links; need for a 'light but firm' approach; need for flexibility to encourage new uses; need for balanced approach; use vacant/empty premises for alternative uses such as community events or markets; offer tax incentives for offices.

Public Health England: support regulating future changes of use for town centres, particularly where this may prevent the negative impact of permitted development rights to change of use to residential with no adherence to space and amenity standards due to their impact on health, wellbeing, and wider social impacts, which is documented elsewhere. Encourage exploring what change of use might mean for food environment in local centres to support healthy choices/ behaviours.

Portsmouth Labour Group important to use planning policy to protect commercial/ employment use and frontages in town centre, at least at ground floor level. As demand for larger commercial/employment spaces in town centres contracts, development to alternative uses including residential at upper floors may then be appropriate, but decent living standards must be ensured.

Question 15a: Do you agree with the approach of the draft Policy E4?	
	No. of respondents: 43
Yes	25
No	12
Not sure/don't know	6
Question 15b: Do you have any further comments or suggestions about the draft Policy E4?	
	No. of respondents: 18

The responses to Question 15b include: Gunwharf Quays is the only 'destination' centre in the city; Commercial Road should be classed as similar to Southsea Town Centre; poor quality of Commercial Road; Milton Market should be added as a centre; consideration

needed to 'low traffic neighbourhood' or '15-minute city' concepts; good transport links required for centres to be accessible, diversified, and successful; benefits of out-of-centre retail - frees up centres for housing; more investment is needed; local shopping should be encouraged; growth estimates should be cautious given the impact of Covid-19; Burrfields Road (Ocean Retail Park) should be added; Lakeside only serves business/employment occupiers.

Historic England: a number of the identified town centres include heritage assets or are located within Conservation Areas; they state that the policy is unsound as it makes no specific provision for edge-of-centre locations.

Portsmouth Climate Change Board: need to develop plans for each centre that support buying local and reduce transportation of goods, as well as linking with active/ sustainable transport corridors.

Premier Marinas Ltd (via agent) comments include: Port Solent should be identified as a District Centre given the proposed significant increase in housing within the Western Corridor and the capacity for delivery at Port Solent. This would enable growth of a supporting leisure/ tourism role and meet needs of future residents/employees. It should be a District Centre given scale and function of Port Solent relative to other District Centres, but at the very least it should be designated as a Local Centre.

E4 - Supporting Portsmouth's Town Centres - Council response

Responses from the consultation showed support for the council to seek to regulate future changes of use for town centre development. Whilst it is out of the scope for planning policy to override provisions made through legislation, the council have the power to impose Article 4 direction(s) as a regulation tool, or utilise other planning tools such as Local (or Neighbourhood) Development Orders to enable certain development within designated areas, in order to promote long-term vitality and viability for the city's centres. With any such use, however, there would need to be sufficient justification and purpose behind it as to whether it is necessary and appropriate to introduce such tools, with consideration also given to whether any of the city's centres should have more flexibility or diversification of uses, especially given the competition for other land uses to meet the development needs of the city as a whole.

The draft policy reflects the principle that town centre uses should have a broader definition and focus than just retail, and makes provision for 'out-of-centre' proposals to assess through a sequential assessment or Retail Impact Assessment the impacts on existing defined centres. This is considered to be in alignment with national policy.

Policy Status: Green

The council will take into consideration all the comments made in relation to Policy E4 and make any necessary changes to the policy in order to fully conform with national policy.

E5 Town Centre Strategies

The draft town centre strategies in the consultation document are intended to set out the overall principles for development. 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.

Question 16a: Do you agree with the proposed approach to Policy E5?	
	No. of respondents: 40
Yes	24
No	7
Not sure/don't know	9
Question 16b: Do you have any further comments or suggestions about the draft Policy E5?	
	No. of respondents: 26

The responses to Question 16b include: Gunwharf Quays and Commercial Road should be separate; agree with reducing size of these areas; not enough 'quality' in these centres; poor quality of Commercial Road - needs improving and investment; small independent businesses need to be encouraged; need inclusion of 'Milton Market'; worsening air quality at Fratton Road due to CAZ; need consideration around management of noise/disruption where mixed-use is proposed; need for quality residential and hotel development; consideration needed for 'low traffic neighbourhoods' and '15-minute city' concepts; need improvements to/provision for walking/cycling/public transport infrastructure; improvements needed to Fratton and North End air quality; provide local centres for local people to encourage regular visits and reduce carbon emissions; Southsea food/café market over-saturated - focus on complementary independent retail and culture; any mixed use/commercial development relating to Cascades needs to respond to St Agatha's Church and also proposed housing.

University of Portsmouth comments include: support the encouragement of creative and cultural life in the city centre to add vibrancy and vitality, and to attract new students; University campus is a key part of the city centre, providing footfall, activity, and vitality, complementing the retail and service functions, and benefitting local businesses/services; recommends the university campus is identified in its own specific boundary.

Portsmouth Climate Change Action Board comments include: in favour of 'fast tracking' change of use as a low carbon way to meet housing need; consideration needed to the use of 'low traffic neighbourhoods' and '15-minute neighbourhoods' to promote active travel to/from centres, including monitoring of people's travel.

Portsmouth Labour Group comments include: generally support policy but unclear on justification for reducing the extent of protected commercial frontages along the Fratton Road/Kingston Road/London Road corridor. Active use by commercial/community play an important role in developing vibrant localities - do not want this put at risk; further residential development on upper floors along this corridor may create further opportunities for commercial/community uses at ground floor.

Public Health England comments include: support drive for public realm improvements and increasing vitality/viability of local centres; can development be required to demonstrate no

adverse impact on the food environment of safe night-time economies through public realm improvements?; use of greening has an integral role in public realm improvements - can local plan opportunities for innovative greening solutions to add amenity value and encourage more active/sustainable lifestyles?; question the differing policy provisions between centres - each will have its own needs but could there be a standard set of principles, with location-specific requirements above this? E.g. improving pedestrian/visitor experience, improving public realm, greening, and air quality as common principles between various centres.

E5 - Town Centre Strategies - Council response

Responses to the consultation show broad support with the proposed approach to the draft policy. The Council welcome the responses and suggestions received through the Regulation 18 consultation and will only make changes to this policy if new evidence necessitate any modifications.

PCC will need to take a closer look at the local context and the local impacts of the Covid-19 pandemic, changes in Use Classes and permitted development, and other factors that may have had an effect on Portsmouth's various town centres' health and vitality, and therefore make any modifications to the proposed strategies where necessary. Through this process, existing town centre health check indicators may be also redefined, and a new methodology put in place for future monitoring of the policy(ies) and reporting in future AMRs.

Policy Status: Amber

The council will take into consideration all the comments made in relation to Policy E5 and make any necessary changes to the policy in order to fully conform with national policy.

5. Community and Infrastructure

C1 Community and Leisure

National planning policy recognises the essential contribution that community facilities make to the health and wellbeing of residents. Community and leisure facilities (including small shops, community halls and sports facilities) are vitally important to the health and wellbeing of local communities and planning policies should therefore plan positively for these places.

Policy C1 seeks to protect and retain these facilities where possible.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C1.

Question 17a: Do you agree with the proposed approach to Policy C1?	
	No. of respondents: 46
Yes	22
No	13
Not sure/don't know	11
Question 17b: Do you have any further comments or suggestions about the draft Policy C1?	
	No. of respondents: 28

Responses received in relation to Question 17b varied with regards to the protection of existing facilities and the need for a vision for the provision of new facilities. Other comments raised concerns regarding the location and poor accessibility of leisure facilities, with the limited access to swimming pools mentioned in several responses.

The **Portsmouth Labour Group** would like to see a focus on securing additional community facilities rather than simply protecting existing ones.

Sport England were concerned that part one of the policy could lead to the loss of sports facilities where demand for another alternative use could be considered more pressing, stating this was inconsistent with paragraph 99 of the NPPF. They also requested 'replacement facilities' to be further defined.

NHS Property Services would like to see clear evidence on what is required to satisfy each criterion of the policy and further stated *"the NPPF is clear in stating that Local Plans should adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 93b). It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estate. These reviews are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties."*

Policy C1: Community and Leisure- Council response

The council will take into consideration all the comments made in relation to Policy C1 and update the policy to ensure it conforms with national guidance.

Evidence of the existing facilities and need for further facilities has been provided within the Portsmouth City Council Indoor Facilities Strategy 2017. This outlines

principles for future provision and recommendations including addressing the projected undersupply of swimming pool provision in the city. The Council intend to update this Strategy in due course.

The Plan as a whole will seek to enhance health, social and cultural well-being, Policy C4 (Infrastructure and Community Benefits) states in assessing the necessary provision or contribution [from development], priority consideration should be given to healthcare, along with six other development types (Transport, Flood Defences, Education, Green infrastructure, Recreational Facilities and Community Safety Facilities).

Policy Status: Green

The council will take into consideration all the comments made in relation to Policy C1 and update the policy to ensure it conforms with national guidance. A glossary will provide further information where necessary. Clarifications will be made to provide further guidance on how the policy criteria could be met.

C2 Open Spaces and Outdoor Recreational

Open space is an important part of the 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 Guildhall Square. 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.

Policy C2 sets out the need for sufficient provision of open space alongside the city's other growth needs including housing and employment space and seeks to protect and enhance these locations to maximise their quality and multifunctionality.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C2.

Question 18a: Do you agree with the proposed approach to Policy C2?	
	No. of respondents: 45
Yes	28
No	7
Not sure/don't know	10
Question 18b: Do you have any further comments or suggestions about the draft Policy C2?	
	No. of respondents: 30

A common response in relation to responses received for Question 18b was the need to protect as much open space as possible, which was raised in six comments. In a further six instances, comments outlined the need for open space to deliver more than simply a green field and provide areas for enhanced biodiversity, with new open spaces, as stated by **Natural England**, needing to be 'multifunctional'. In addition to this, there were comments

submitted highlighting the need for these spaces to be locally accessible, including a comment from the **Woodland Trust**, who also recommended *"adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation."*

There was some level of ambiguity surrounding the phrase 'wider public benefit' with a handful of comments questioning whether this was quantifiable.

Sport England did not support the loss of playing fields where public benefits could be demonstrated, stating it was not consistent with Paragraph 99 of the NPPF. In addition, they wanted to *"make it clearer where existing provision is considered 'surplus to requirements', this is based on a robust assessment of need."*

The **Milton Neighbourhood Forum** further questioned the potential for developers to build over existing open space where public benefits outweigh their loss.

RSPB and **Hampshire & Isle of Wight Wildlife Trust** and **Portsmouth Climate Action Board** all raised comments regarding the role that Tipner plays in delivering open space in a densely populated city and therefore its importance should be recognised. Other comments encouraged the protection of Fort Cumberland and Fraser Range.

The Langstone Campus Playing Fields and Furze Lane are identified in Figure 17³ as protected open space. One comment queried the fact that these sites are also within the council's Brownfield Register and whether Policy C2 could contradict this.

Objections were made to the land at St. James' Hospital being allocated by the **Solent NHS Trust** and **PJ Livesey** and **NHS Property Services**, as open space as it would conflict with any future healthcare development that may be required.

The third, fourth and fifth questions and the responses are outlined below.

Question 18c: Are there any areas of open space that should be added or removed from the policy?	
	No. of respondents: 36
Yes	12
No	13
Not sure/don't know	13

There was a relatively even distribution of responses to Question 18c. Fort Cumberland, Fraser Range and Tipner were all areas highlighted that required protection.

The **Solent NHS Trust** and **PJ Livesey** and **NHS Property Services** wanted to see the open space at St. James' Hospital removed as open space provision. Other comments raised the need for a golf course on the Island and asked for the removal of Moneyfields as this is being developed.

Question 18d: Should major new development deliver new open space?	
	No. of respondents: 43
Yes	36
No	1
Not sure/don't know	5

³ Draft New Local Plan Consultation Document (2021), Page 114, accessible here: [Portsmouth Local Plan 2038](#)

There was a strong response in favour to Question 18d, with many respondents wanting more greenspace wherever possible.

Question 18e: Should major new development deliver new open space?	
	No. of respondents: 36
Yes	16
No	4
Not sure/don't know	16

The policy proposes on developments of 100 or more homes, open space to the ratio of 1.65ha per 1,000 people is delivered. Whilst there was a strong backing in favour of this ratio, the same number of responses also were not sure.

Policy C2: Open Space and Outdoor Recreation- Council response

The overarching aim of Policy C2 is to protect and enhance existing open space within Portsmouth, delivering it where possible. Within the supporting text for the policy, it is states that *"proposed enhancements of existing open space and recreation area should consider opportunities to increase the multifunctionality of these spaces"*, for example through enhancing biodiversity value or installing new and improved recreational facilities.

The policy will be amended to comply with the NPPF and additional guidance or clarification will be provided where necessary.

The government's National Model Design Code guidance notes (published July 2021) indicate that open space and recreation guidance on Accessibility to Natural Greenspace (ANGSt) will shortly be updated and will be focused on distance/accessibility to open space as opposed to the population-based standards which form the current evidence base for open space needs for the plan period. The evidence base for may need to be reconsidered on this basis. The Council is also intending to update its own Recreation/ Sport facility Strategies which may feed into this policy.

Comments seeking to protect open space at Tipner and other nearby areas are noted. The Open Space map will be updated in-line with the progression of the St James' and Langstone Strategic Site Allocation and the Milton Neighbourhood Plan and as part of annual monitoring of planning permissions.

This policy proposes on developments of 100 or more homes, open space to the ratio of 1.65ha per 1,000 people is delivered. Whilst there was a strong backing in favour of this ratio, the same number of responses also were not sure as shown by the results of Question 18c. To further understanding of this policy and ratios, the Council will look to provide visual representations.

Policy Status: Amber

The council will take into consideration all the comments made in relation to Policy C2 and make any necessary changes to the policy in order to fully conform with national policy.

C3 Sustainable Transport

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 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.

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 centred travel network across the city, linking into and connecting local areas.

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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C3.

Question 19a: Do you agree with the proposed approach to Policy C3?	
	No. of respondents: 47
Yes	26
No	11
Not sure/don't know	8
Question 19b: Do you have any further comments or suggestions about the Policy C3?	
	No. of respondents: 50

The responses to Question 19b included: phase out petrol/diesel as quickly as possible to discourage use and achieve clean air; joined up strategy needed for Eastern Corridor; incentives needed to get the worst-polluting cars off the road; encourage more walking and cycling and ensure routes are safe/secure; improve infrastructure for mobility-impaired; free electric/hydrogen powered buses; more fast EV chargers across the city; making the seafront "car-free" unless EV; cycling routes need to be off-road; too much cycling provision already; all public transport, including taxis, should be EV; lack of cycle paths at east of city; "enable" rather than "encourage" the use of public transport; "Exploration" of a bus depot not enough; policy needs to include management of car movements; most dwellings do not have dedicated parking for EV charging; look at bus stop locations to see if in right places; reopen Commercial Road to buses only to save bus journey times; "chain car ferry" between Portsmouth and Hayling Island; suggested alteration improvements to various bus services and bus ticketing; more affordable public transport needed; exemptions needed for small businesses; opposition to Clean Air Zone; increase CAZ to include Fratton Road; reduce car/freight journeys across whole island to enhance health and wellbeing; increase Park and Ride capacity significantly; introduce charges to residents and visitors driving in the city; need to understand impact of Covid-19 pandemic on travel and strike a balance on proposals e.g. Park and Ride; new rail stop at Paulsgrove; establish 15-minute neighbourhoods/low traffic neighbourhoods; expansion of employment result in higher commuter traffic - similar with Tipner housing; consider use of trams.

The Milton Neighbourhood Forum (MNF) supports the aims and objectives of the policy; though note that past Local Plans and Local Transport Plans have been ineffective in promoting active travel and public transport, and reducing reliance on private cars. According to the Department for Transport (DfT) figures, Portsmouth is the 4th most congested city in the UK. The MNF support principle of granting planning permission for development where priority is given to pedestrian and cycle movements with high permeability by foot, cycle, and public transport connecting to local walking and cycling networks and services/facilities. However, state strategic transport and active travel initiatives need to be implemented before further major developments are started.

Southampton City Council (SCC) broadly support the plans and are working with Portsmouth (and other authorities) to deliver the PfSH objectives including the South East Hampshire Rapid Transit. SCC reiterated the need for coherent and reliable connections between Portsmouth and Southampton that offer viable alternatives to car travel to tackle M27 congestion and suggest PCC might consider the Southampton Local Transport Plan 4 through plan making process.

Hampshire County Council (HCC) are supportive of Policy C3 and transport policies for developments to reduce the need to travel and deliver a people centred travel network that prioritises walking, cycling, and public transport. HCC want to strengthen the joint working on public transport issues and - building on the Transforming Cities Fund - both authorities need to continue to develop opportunities to improve transport infrastructure and expand the South East Hampshire Rapid Transit.

Homes England (via agent) comments included noting that the alignment with LTP4 is paramount to ensure that a co-ordinated transport strategy is delivered and suggesting that the policy could recommend early engagement with the authorities, to determine the most appropriate forms of mitigation for congestion relief. In relation to the Transport Assessment prepared by Systra, no allowance [is made] for the other sustainable measures identified by the Local Plan or LTP4 (beyond the Bus Rapid Transit scheme) - none of the impacts from these have been allowed for in the forecast traffic, it is highly likely that these would come forward in the short/medium term or at least by 2036. Homes England also state that any developer contributions sought should be justified in policy in order for plan to be sound, and should meet CIL Regulation tests if sought through development.

Home Builders Federation (HBF) comments included how policy cannot be set outside of the local plan through Supplementary Planning Documents, therefore parking standards must be set out in the local plan, and any changes to these are considered through proper process of consultation and examination; if referencing SPD, then should be clear that development will need to take account of this guidance but not that it must accord with it.

Bellway Homes Ltd (Wessex) (via agent) acknowledged this slightly changed policy and have had regard to sustainable transport in their current proposals and will be providing electric charge points where appropriate and feasible to do so.

PCC Strategic Developments support Policy C3's inclusion of links between Tipner and Horsea Island, allowing buses, cyclists, and pedestrians access between Tipner and Horsea Island, the country park and Port Solent. The proposed bridge link is part of wider package of infrastructure which will support the new community at Tipner West and Horsea Island East - although noted that this would require Option 1 to be delivered at the site (rather than Options 2 or 3).

National Highways (formerly Highways England) key comments are summarised below:

- National Highways (NH) look to Portsmouth City Council to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. NH would be concerned if any material increase in traffic were to occur on the Strategic Road Network (SRN) or at its junctions because of planned growth within the city, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place.
- When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. NH will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.
- NH welcome the requirement for the submission of Transport Assessments to support development proposals. Policy C3 includes the requirement for development to 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.
- As the Local Plan is developed it is important that any essential infrastructure required to deliver proposed allocations within the plan is identified. It would need to be demonstrated that there was a reasonable prospect of delivery of the infrastructure that is relied upon, otherwise there is a risk the Local Plan would not be sound.
- When identifying the preferred strategy for the spatial options, consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth in Portsmouth on the SRN. NH welcome further dialogue on potential growth options. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably practicable. As previously stated, we will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.
- Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.
- To ensure that the Local Plan is deliverable, a transport evidence base should be provided to demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required to deliver the Local Plan development. NH would welcome the opportunity to discuss this with Portsmouth ahead of the next Local Plan consultation.

Portsmouth Cycle Forum comments include:

- Would like to see further detail on how Portsmouth City Council will ensure it is deliverable. Whilst Portsmouth Cycle Forum broadly agrees with the proposed approach to Policy C3, PCF remain cautious about the implementation, deliverability and monitoring of it.
- PCF feel that the following points are missing and should be added to ensure that the policy is sufficiently robust, and deliverable: Focus on “place” as well as a transport network; That the Clean Air Zone is retained in order to improve long term health and support changed travel habits ; Plans for freight consolidation centres - is land being allocated for this purpose?; Is the land for new walking and cycling routes being designated through the Local Plan so that developers know they must not build over it and must ensure that their sites are permeable?; Improving public transport connections is mentioned, but reducing pollution from buses and improving access to buses and rail is not included - should the Bus Service Improvement Plan be referenced at this point?
- New policies over and above the Street Works Manual should be introduced to ensure that people walking and cycling are not disadvantaged during roadworks.
- PCF expects that:
 - Transport impacts are not just “mitigated”, but instead - and in line with LTP4 - there is a net gain for sustainable travel.
 - PCC’s Parking and Transport Assessment SPD is updated so that it is in line with the aims of the LTP4 and Local Plan, and makes it possible to work with developers to deliver improved facilities for walking and cycling. SPD should be updated to a “decide and provide” approach.
 - The policy is amended to specifically state that developers will be expected to use best practice methods to assess walking, cycling, public transport and permeability with suitably experienced transport planners who actually walk and cycle (Local Transport Note 1/20 requires this of all designers).
 - Specific reference is made to the Local Cycling and Walking Infrastructure Plan and future versions of this or similar documents
 - Monitoring measures are strengthened
 - It is made very clear that the mitigation options in the Transport Assessment are not taken forward before being made compliant with design guidance for walking and cycling.

Portsmouth Climate Action Board include:

- Would like the phrase ‘affordable to use’ added to this sentence: ‘The provision of a safe, convenient, efficient and AFFORDABLE TO USE transport network is key in helping to build vibrant local communities, enable regeneration and achieve an environmentally sustainable future’.
- In place of vaguely worded aspirations, we believe that specific, time bound and measurable targets need to be introduced in relation to lowering carbon emissions from road transport and improving the percentage of local journeys using active travel. Creating a joined up network of segregated cycle lanes is a priority. Low traffic neighbourhoods and traffic circulation schemes should be given serious consideration too.
- In relation to this vision statement: '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' we regard the 2038 date as too distant and unambitious in terms of timescale.

- We believe allowing another generation to grow up with poor air quality, dangerous cycling infrastructure and slow / expensive public transport is unconscionable. We would like to see specific interim targets that have measurable outcomes by 2022, 2024, 2026 etc. so that high quality active and shared mobility infrastructure is delivered by 2030 at the latest.

Portsmouth Labour Group comments include: This policy is of key importance in terms of delivering sustainable development, that does not negatively impact on air quality, carbon emissions and connectivity within the city. It could perhaps be strengthened with greater emphasis on the need for green/zero carbon forms of public transport.

Premier Marinas Ltd (via agent) comments include: support the principle of improving 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; this should be delivered as part of a comprehensive package of measures designed to facilitate growth across the existing Port Solent allocation, as well as those now proposed at Horsea and Tipner; note the October 2020 Transport Assessment document, prepared by Systra, states that in relation to the A27 (Southampton Road) / Port Way junction, which is the key junction referenced within the currently adopted Local Plan allocation for Port Solent (PCS2), "the junction remains within capacity in all scenarios". Figure 1 of the document suggests that the development scenarios tested include the 500 dwellings currently allocated at Port Solent; but only appears to accommodate approx. 1,300 dwellings across the Tipner sites; this evidence base document therefore suggests Port Solent may be delivered with no transport interventions, but the Tipner development would be likely to have greater impacts over and above the assessed scenario.

Friends of Old Portsmouth Association comments include:

- Systra Transport Assessment Ref. no. 107890 dated 23 Oct 20. Several inconvenient facts are ignored:
 - It's not traffic congestion that causes air pollution, it's fossil fuel burning traffic that causes air pollution.
 - 'Optimising' road junctions to reduce queuing traffic involves giving priority to vehicles. This means relegating pedestrians to a lower priority so that they have to spend longer waiting in polluted air to cross roads. This discourages walking.
 - Making it easier to drive induces demand as more people then want to drive. Conversely, failing to allocate road space to encourage active travel suppresses demand for walking and cycling.
- It is apparent that the assumption that the city needs and can accommodate the extra road traffic is in stark contradiction to the LTP4 vision and strategic objectives
- Most of our city is on an island that is a physical limit on the number of motor vehicles that can be squeezed into Portsmouth. Inexorable increase in the number of motor vehicles registered in Portsmouth, the number of miles driven and a plan of the island.
- Missing from the Systra report is a declaration of the motor traffic growth assumed in their modelling, and an assessment of where all the vehicles will physically go.

- Systra report seems to disregard the LTP4 vision and strategic objectives. Reading the document, it is evident that despite the title 'Transport Assessment' it is merely a motor transport assessment.
- In the week that COP26 starts, it is depressing to view how the report's authors are fixated on the outdated 'predict and provide' approach to striving to meet the insatiable demand for more road capacity for motor traffic. In 122 pages,
 - Only two mentions of existing cycle lanes (that fail to acknowledge that most cycle lanes in Portsmouth do not comply with DfT standards)
 - Only three mentions of cyclists
 - Only two mentions of air quality (and no reference to the embarrassing fact that Portsmouth continues to have illegally high levels of polluted air)
 - No mention of climate change or climate strategy
 - No mention of the clean air zone (CAZ) and the need to curb motor traffic (even though a CAZ was being considered well before Systra produced their report)
 - No mention of electric vehicles (BEV)
 - No consideration of parking capacity and where all the extra vehicles will be accommodated
 - No mention of rail transport
 - No mention of local ferry services
- The danger is that as Systra have confined their report almost exclusively to making it easier for polluting motor vehicles to drive into and around the city, this will become the baseline assumption and that sustainable transport initiatives will be relegated to lower priority.

Isle of Wight Council comments include:

- IWC fully support the commentary at paragraph 4.3.25. Sustainable travel has multiple benefits in relation to climate change, air quality and amenity and ensuring modes of travel between the island and Portsmouth are as sustainable and accessible as possible should be supported.
- IWC fully support the four strategic objectives of the Portsmouth Transport Strategy (Local Transport Plan – LTP4), particularly objective 3 'Transforming public transport'. Isle of Wight residents rely on public transport connections within Portsmouth for access to a wide range of key services and facilities, including those at QA hospital, and making journey times and connections as manageable as possible would be beneficial to island residents.
- IWC support the content of Policy C3 Transport and would suggest that a further bullet is added relating to the importance of maintaining and enhancing ferry connections to the Isle of Wight. Notable recent improvement schemes at The Hard Interchange (completed) and Ryde Interchange (shortly to commence) are positive steps to ensuring passenger comfort and experience using the ferry connection is enhanced, whilst maintaining these essential routes that many island residents rely on for access to key services and facilities.

Public Health England are supportive of the proposed approach.

C3 - Sustainable Transport - Council response

The underlying broad principles of this policy are derived from the now adopted PCC Local Transport Plan 4, which was prepared through extensive consultation and informed by various recent guidance and strategies relating to transport policy. The LTP4 has also identified specific local projects and workstreams, providing an indicative prioritised delivery plan covering the period 2022/23 to 2024/25 and an indicative plan up to 2038, to implement the various aims and objectives within a Portsmouth context, which this policy also promotes. These aims/objectives are broadly as follows:

- Deliver cleaner air
- Prioritise walking and cycling
- Transform public transport
- Support business and protect our assets

The above have specific schemes/projects (some overlap across objectives) identified relating to, for example, car clubs, on-street EV charging, walking and cycling infrastructure, public transport infrastructure such as integrated ticketing, and traffic management and signalling initiatives.

In terms of parking provision and transport assessment/plan requirements, these are informed by and should align to the provisions made in NPPF Section 9.

Policy Status: Green

As a high-level strategic policy, this is considered to be sound on the basis that it accords with NPPF para 106, in particular criterion b) where it states that planning policies 'should be prepared with the active involvement of local highways authorities... so that strategies and investments for supporting sustainable transport and development patterns are aligned'. With the express link of this policy to the adopted LTP4, this ensures that strategies and associated projects have a joint strategic direction towards successful implementation within the identified plan period.

C4 Infrastructure and Community Benefits

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.

National Planning Policy states that in setting out the Local Plan's overall strategy for the pattern, scale and quality of development, sufficient provision must also be made for infrastructure.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C4.

Question 20a: Do you agree with the proposed approach to Policy C4?

	No. of respondents: 44
Yes	23
No	6
Not sure/don't know	16

Question 20b: Do you have any further comments or suggestions about the suggested approach to Policy C4?	
	No. of respondents: 24

The responses to Question 20b focused mainly on transport infrastructure which included support for cycling and walking improvements including 15 minute neighbourhoods, although there were other responses that felt too much was being spent on cycling. Prioritising spending healthcare and flood defence infrastructure was also mentioned by a number of responders. Several responses questioned the effectiveness of the Community Infrastructure Levy (CIL) to provide the required funding for infrastructure.

Hampshire County Council Minerals and Waste - With specific reference to Section 4.5 of the Draft Local Plan, it is noted that a safeguarded waste site is missing from Figure 19. This site is Tipner Waste Transfer Station, operated by T. J. Waste & Recycling Limited. This site is safeguarded under Policy 26 (Safeguarding – waste infrastructure) of the HMWP, and as such is of particular importance with regard to the housing allocation BL1 – Tipner. Under allocation BL1, should the Tipner Waste Transfer Station be proposed to be removed and redeveloped, contact should be made with the operator and in line with the requirements of Policy 26 replacement equivalent capacity should be provided elsewhere as needed.

Missions/ Vanguard - it is noted that the current adopted 2012 Local Plan safeguards a large area of land for highway improvements, and this has now been removed from the emerging plan. We fully support the removal of this safe guarded land designation which has previously acted as a blight to development coming forward.

Southern Water - In addition, whilst the Council has not indicated that the draft Infrastructure Delivery Plan is currently open to consultation, in light of recent developments in strategic planning for water supply in Hampshire, we would like to provide some additional information which we believe is relevant to the IDP. A strategic new water resource scheme to secure water supply for Hampshire customers during dry weather is currently being proposed by Southern Water's Water for Life: Hampshire programme. The current emerging preferred option is for a water recycling and water transfer proposal to augment water supply from the recently consented Havant Thicket Reservoir. Given that this emerging scheme includes a potential pipeline corridor through the northern part of the Council's administrative area, and to highlight the strategic nature of this necessary infrastructure, we would like to see this reflected in the 'Planning Infrastructure Investments' section of the Draft Infrastructure Delivery Plan. We would be happy to provide further detailed wording to the Council in this respect as required.

Portsmouth International Port - South of Portico Terminal

Other than Tipner, we would like to re-emphasise our proposed land use for the following areas within the PCC area:

Area A: Hughes and Salvidge Scrap Yard Area – Circa 0.6Ha

Area B: North of Morrison Site and Industrial Employment Area -circa 1Ha

Both sites are strategically placed south of the Portico terminal which are ideal for future expansion of the boundary and operational area of the Port. We would like to formally request for PCC to consider the potential utilisation of both the Rudmore Square Area and Tear Drop Site for future port development purposes in the Local Plan. The exact amount of

land that can be allocated from these sites can be further discussed at the next stage of consultation.

NHS Property Services Limited, Registered in England & Wales - The significant cumulative impacts of residential developments on healthcare requirements in the area should be recognised. Given their strategic importance, health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects. NHSPS is therefore pleased to see healthcare included as a priority consideration for funding within Policy C4.

Portsmouth Labour Group - This policy as drafted seems to only be about trying to protect existing community facilities whereas we would like to also see a focus on future community facilities as well.

Bellway Homes - the Policy should reference the fact that some of the infrastructure types listed may be covered by CIL, and that this will also be part of the overall consideration in determining the levels of contributions required.

In addition there were a number of infrastructure interventions proposed by members of the public such as trams. There is a greater need for doctors school places, dentists, hospital appointments and all other such needs that should be way above some of the concerns in the local plan, particularly the proposed additional new homes. Should be addressed way before more housing that will negatively impact people of portsmouth.

C4 Infrastructure and Community Benefit - Council response

The responses focused on infrastructure on a wider scale and did not make mention of specific projects. The focus was largely on transport improvements, health and flooding. The Council will make sure that these areas are clearly covered in the regulation 19 policy.

The specific infrastructure projects highlighted in the comments will be taken on board through the Infrastructure development Plan and site specifics through the Housing and Economic Land Availability Assessment.

Policy Status: Green

There policy does not require any major changes prior to regulation 19, the Council will look to ensure that the main areas of concern for infrastructure provision are clear in the policy.

Minerals and Waste

A comment was received from the Hampshire Minerals and Waste Planning Team which overall was supportive of the section though they identified a safeguarded site (Tipner Waste Transfer Station) omitted from Figure 19. The Council will amend the map to ensure that the omitted site is included.

6. Portsmouth's Environment

G1 Biodiversity

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'.

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.

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.

Question 21a: Do you agree with the proposed approach to Policy G1? If not what changes would you suggest and why?	
	No. of respondents: 42
Yes	23
No	13
Not sure/don't know	6
Question 21b: Do you have any further comments or suggestions about the suggested approach to Policy G1?	
	No. of respondents: 37

The responses to Question 21b included; the need to introduce biodiversity across the city through green walls and roof, interlinked corridors, sustainable drainage and new wetlands; mitigation packages and compensation should not be an option, and it is not enough to say new development should seek to conserve and enhance the natural environment 'wherever possible'; this policy should also challenge the impact on carbon emissions; look to further incentivise biodiversity in gardens, swift and bat bricks are essential and should be made mandatory in planning policy; this policy should be strengthened; the use of the words 'adequately compensated' weakens this policy and this policy needs to be linked to trees and their protection.

The Milton Neighbourhood Forum (MNF) in general welcomes the environmental policies included in the plan, however feel policy G1 might be better expressed to clarify an apparent inconsistency where in relation to development proposals adversely affecting designated sites. The MNF cannot agree with the principle that the "mitigation" of, or "off-setting" of, harm to wildlife habitats is acceptable or appropriate in order to allow an expansion of house-building when our environment has already been degraded by development and depleted of function through stress and pollution.

The RSPB and HIWWT have recommended a number of changes to the text within draft Policy G1 which the Council will review alongside the following:

- As part of the Ecological Network, we would like to see reference to the Nature

Recovery Network and sites identified as part of the upcoming Local Nature Recovery Strategy, which is due to be mandated with the enactment of the Environment Act.

- Ecological Network should explicitly state that it includes all Solent Wader and Brent Goose Strategy sites, Hampshire's Local Ecological Network (Core Sites and Opportunity Sites), Biodiversity Opportunity Areas and Priority Habitat Areas.

Portsmouth Climate Action Board would like policy G1 to also included challenge the impact on carbon emissions for example, some of these habitats store carbon, so need to be protected.

The Labour Party support the biodiversity policy in general but would like to see these strengthened and made more specific for example, the inclusion of requirements for green walls and green areas around new homes and businesses.

Natural England made the following comments in relation to question 21b:

- Portsmouth's Ecological Network - Please note Figure 20 depicts International and National Nature Designations, however the legend or symbology is not clear. It is recommended the map is modified to clearly show the international and national designations in and around Portsmouth, including Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites and Sites of Special Scientific Interest (SSSI).
- Designated sites - The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advise that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Table 5 should also be updated to reflect the hierarchy of designated sites. Designated sites should be protected and, where possible, enhanced.
- Strongly recommends that the Local Plan includes a stand-alone policy to ensure the protection of the network of Solent Wader Brent Goose Strategy sites in the City. The Local Plan Habitats Regulations Assessment will need to appropriately address the impact of development allocations on the network of SWBGS sites.
- Recreational disturbance - welcomes the commitment of Portsmouth City Council in supporting the Solent Recreation Mitigation Strategy and the proposal to ensure conformity of this strategic mitigation solution with Local Plan policy. We recommend that the Local Plan includes a stand-alone policy to counteract the likely significant effects of recreational disturbance, (either alone or in-combination) associated with residential development within a 5.6km zone of influence on the Solent SPAs (Solent & Southampton Water, Portsmouth Harbour Chichester and Langstone Harbours and Solent and Dorset Coast).
- Biodiversity Opportunity Areas and Nature Recovery Networks - Natural England welcomes the recognition of the need to focus 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'. Work is underway within Natural England and with partners on several of the key elements of the Environment Bill, including Nature Recovery

Networks and Local Nature Recovery Strategies. It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife. Local Nature Recovery Strategies (LNRs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. Given that national guidance on LNRs and their relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNR covering the area.

Question 21c: How should new development seek to deliver biodiversity net gain within Portsmouth's urban environment?	
	No. of respondents: 31

The responses to Question 21c included; the need to plant trees within new developments; encourage a range of nest boxes, green walls or roofs and community orchards; requiring the creation, restoration and recovery of habitats, not just conserving what is left; incorporating swift bricks into all new and refurbished buildings; adopting best practice guidance such as NHBC Biodiversity in New Housing Developments and only using locally appropriate species.

Hampshire Swifts response recommends PCC to include a 'Swift-specific' policy in the Local Plan and include the implementation of integral Swift bricks into the design of new developments would go a long way towards delivering suitable biodiversity net gains.

RSPB & HIWWT's response states PCC should spatially identify which sites are strategically significant for nature through the Ecological Network and put in a presumption that any offsite biodiversity net gain should be delivered on these sites. This policy should include clear monitoring indicators to regulate biodiversity net gain within the Local Plan. Their response also encouraged the Council to amend draft Policy G1 and set a target for development to go above and beyond the Government's 10% minimum biodiversity net gain, instead aiming for at least 20% biodiversity net gain.

Portsmouth Climate Action Board recommends using a range of solutions included green walls, roofs, bat boxes, holes or hedgehogs and tree planting.

Natural England welcomes the requirement within Policy G1 for development to achieve a net gain for biodiversity, however recommends that minimum requirement for biodiversity net gain provision is set. Natural England also made the following comments in relation to question 21c which are summaries below:

- Recommend a separate standalone policy for Biodiversity Net Gain is proposed with the Local Plan which sets a minimum requirement for biodiversity net gain provision. The policy should also set out a requirement for the development and adoption of a Supplementary Planning Document (SPD) which can set out further detail relating to mandatory net gain, upon which the Council can build.
- Policy should set out how biodiversity net gain will be delivered, monitored and managed and the priorities for habitat creation or enhancement in

different parts of the plan area. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. We therefore welcome the intention for the Council to prepare a shortlist of suitable biodiversity creation and/or enhancement projects to which off-site contributions could be made to help local development achieve biodiversity net gain.

- Biodiversity Metric 3.0 has now been published and is recommended the policy is updated to refer to this and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Natural England strongly advises that developers are required to agree their calculations with your Council through a suitably designed process or protocol.
- Features such as bird and bat boxes, swift bricks, bee hotels etc should be classed as general biodiversity enhancements that should be included as part of a wider biodiversity enhancement and mitigation plan. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric.
- The Local Plan should include requirements to monitor biodiversity net gain. These requirements should include indicators to demonstrate the amount and type of gain provided through development.
- Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include:
 - Identifying opportunities for new multi-functional green and blue infrastructure.
 - Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient
 - Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
 - Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
 - Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore)
 - Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats.
 - Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.
- As part of the Ecological Network, reference should be made to the Nature Recovery Network and sites identified as part of the upcoming Local Nature Recovery Strategy, which is due to be mandated with the enactment of the Environment Act. The Ecological Network should explicitly state that it includes all Solent Wader and Brent Goose Strategy sites, Hampshire's Local Ecological Network (Core Sites and Opportunity Sites), Biodiversity Opportunity Areas and Priority Habitat Areas.

Question 21d: If biodiversity net gain cannot be delivered on-site, where should projects/ locations for biodiversity creation and/ or enhancement be located within the city?	
	No. of respondents: 28

The responses to Question 21d included; through existing developments; if not onsite, development should not be allowed to go ahead; on school, health and community sites within the city; Farlington Marshes; Horsea Country Park; every development should make a contribution no matter how small; and parts North End.

Homes England's response stated that there should be the provision for commuted sums to be made, subject to the CIL Regulation tests, that direct funding to biodiversity conservation, enhancement and restoration projects identified by the Council in their evidence base.

Portsmouth Climate Action Board recommend that PCV seek to replicate Bristol City Council's tree replacement standard in their Planning Obligations SPD.

RSPB & HIWWT response highlighted how the Ecological Network should be a foundational spatial tool for the Local Plan to strategically decide the allocation and delivery of biodiversity net gain to ensure the maximum benefit for people and nature.

G1 Biodiversity - Council response

The responses to the regulation 18 consultation have further highlighted the importance of the delivering biodiversity within the city.

In preparation for its regulation 19 consultation the City Council will ensure that approach to this policy is in-line with any new is and the provisions of Environment Act 2021. This will take on board comments and suggestions made in response to regulation 18. The Council will also continue to work with the PfSH authorities in delivering requirements of the Environment Act 2021 which includes biodiversity net gain and Local Nature Recovery Strategies.

Policy Status: Green

The Council welcome the responses and suggestions received and will carry out further investigations of the points raised and will refine the policy in light of new evidence.

G2 Green Infrastructure

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.

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 of 'grey' infrastructure (such as roads, sewers and services) The council has ambitions to increase the levels of green infrastructure within the city which is vitally important given the pressures from population growth, climate change and other competing needs.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy G2.

Question 22a: Do you agree with the proposed approach to Policy G2?	
	No. of respondents: 44
Yes	31
No	6
Not sure/don't know	7
Question 22b: For instance, are there any proposed green infrastructure routes that should be added or removed from the policy?	
	No. of respondents: 36
Yes	18
No	4
Not sure/don't know	14
Question 22c: If answered yes to 21b, which green infrastructure routes do you feel should be added or removed from the policy?	
	No. of respondents: 20

There were a total of 20 responses to this question, with varying views. The requirement for as much green infrastructure as possible was raised four times with the inclusion of green infrastructure along roads. Two further comments however opposed the delivery of green infrastructure along roads as this would limit benefit to flying insects and birds and could become rubbish traps.

Other locations raised within the comments included the southern end of Langstone Harbour (Milton Locks to Hayling Ferry), the new country park, areas around Hilsea, Stubbington, Bransbury to Langstone Harbour and additional areas in the south of the City. Other more localised suggestions included Baffins Road, Waverley Road, Victoria Road and Festing Road.

Both the **RSPB and Hampshire & Isle of Wight Trust** and **Portsmouth Climate Action Board** outlined the role that Tipner West played as an area of open space and therefore should be recognised for its importance.

Policy G2 includes the use of an Urban Greening Factor (UGF) tool within identified areas. 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. A completed assessment will need to accompany all development proposed within these areas. The Local Plan 2038 Regulation 18 consultation also sought views on the use of the UGF tool within Policy G2.

Question 22d: Is the proposed Urban Greening Factor (UGF) Tool an appropriate way to ensure and measure net increasing in green infrastructure?	
	No. of respondents: 37
Yes	16
No	3
Not sure/don't know	17

Question 22e: Do you agree with the proposed locations for the UGF tool to be applied to new development?	
	No. of respondents: 32
Yes	8
No	6
Not sure/don't know	18
Question 22f: Do you have any further comments or suggestions about the suggested approach to the green infrastructure in Portsmouth??	
	No. of respondents: 28

In relation to the UGF, eight comments (the largest proportion) were received which did not consider the UGF sufficient to deliver the appropriate level of green infrastructure.

In response to the overall approach of G2, comments supported the protection of trees, although felt more could be done and highlighted the importance of improving the management of existing green infrastructure.

Abri group suggested rewording of the policy as there is no certainty for proposals which have ancient woodland, aged or veteran trees 'nearby'. Woodland trust also supported this policy although suggested strengthening it through a proposed ratio of tree replacement, a specific policy in support of new tree planting and setting a target for tree canopy cover. Woodland trust recommends a 20% canopy cover target for the city with a 30% cover for development sites.

CPRE Hampshire requests Portsmouth continue to work with PfSH to include a Green Belt within their spatial planning work and include this within Policy G2.

The Solent NHS Trust raised further concern for the provision of green infrastructure at St James' Hospital.

RSPB and Hampshire & Isle of Wight Trust and Portsmouth Climate Action Board would like the policy to set high quality principles and buildings with Nature Standards, or an equivalent benchmark be set.

Natural England supported the overall approach of the policy welcoming the recognition of green infrastructure benefits; the proposal to link up green spaces through corridors; the adoption of a UGF tool; the commitment to doubling the number of trees over the next 25 years and the requirement for development on or adjacent to proposed green infrastructure networks to protect and/or contribute to the creation, enhancement and connectivity of the network. When published, PCC will take into consideration Natural England's Green Infrastructure Standards Project.

G2 Green Infrastructure - Council response

The key role of this policy is to resist the net loss of existing green infrastructure and deliver where possible new and improved green infrastructure networks. The Green Infrastructure Background Paper 2021 presents an analysis of all the various components forming Portsmouth's green infrastructure network and sets out the key considerations behind the formulation of the draft Policy G2. Where possible, the wording will be slightly amended to enhance protection to important 'nearby' ancient woodland, aged or veteran trees.

The potential new green corridors that have been shown within figure 21 of the Local Plan have been informed by the recommendations in the 2018 open spaces assessment to try and link up existing green spaces. An Assessment of Tree Cover in Portsmouth (2019) acknowledges the city has a lower canopy cover than other comparative cities and planned development (including Horsea Island) will seek to rectify this. The council will review the proposed green infrastructure location outlined within the responses.

The council has also been working on a Greening Strategy which looks to promote greening within the city via several different streams, including tree planting, in particular. The "Greening Strategy will be led by a team of officers to ensure there is a joined up comprehensive approach to land that is the responsibility of the city," improving management of green infrastructure. Where possible, targets will be introduced into the Local Plan.

The Green infrastructure Background Paper sets out all the background evidence behind the reasoning for the adoption of a UGF tool to be used as part of the Local Plan, concluding that "the requirement of some degree of improvement above minimum is the best approach for a UGF policy to take at present." The use of the UGF will be reviewed on Tipner, although no firm proposal has been sought for the future of this location as of yet.

The Green Infrastructure Background Paper, further outlines government requirements for all plans for green infrastructure be evidence based, although Building with Nature Standards will be considered.

Portsmouth Council will continue to work with PfSH in delivering appropriate green infrastructure solutions. Following discussions between Milton Neighbourhood Forum and NHS property services in relation to St.James' the policy will be updated accordingly.

Policy Status: Amber

The council has taken on board the comments received in relation to Policy D2 and will consider the potential locations for additional green infrastructure that were put forward. The UGF tool was presented after extensive research, however, the use of the Building with Nature Standards or equivalent will be considered. Portsmouth Council will continue to monitor the status of land at St.James' and update the policy as necessary.

G3 Water Quality (Nutrient Neutrality)

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 eutrophication⁴ and adverse impacts on the water quality of designated habitat sites, with some areas classified as being in an 'unfavourable' condition.

There is uncertainty regarding the impact of new housing (and other development resulting in 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 Regulations⁵, this uncertainty must be appropriately addressed in order for the

⁴ Eutrophication is a process where an excessive richness of nutrients causes a dense growth of plant life and algae, depleting the oxygen available in the water body and harming aquatic species.

⁵ Conservation of Habitats and Species Regulations (England and Wales) Regulations 2017 (as amended)

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.

Natural England, the government’s advisor for the natural environment, has issued guidance on achieving ‘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.

The Local Plan 2038 Regulation 18 consultation sought views on the Council's approach to Policy G3 which aims to ensure new development involving or generating new overnight stays is nutrient neutral.

Question 23a: Do you agree with the proposed approach to Policy G3?	
	No. of respondents: 36
Yes	17
No	9
Not sure/don't know	10
Question 23b: Do you have any further comments or suggestions about Policy G3?	
	No. of respondents: 28

The responses to Question 23b included; there needs to be a greater focus upon how relevant organisations (such as water companies) will partner on this; water quality is so important for wildlife and offsetting using a nitrogen budget is a last option; this policy does not go far enough; the water infrastructure must be improved first; and to ensure this policy can be found sound at examination, the measures set out in the Interim Nutrient Neutral Mitigation Strategy or other appropriate mechanisms should be incorporated into this policy to provide reasonable certainty to development.

The Environment Agency response stated that whilst they understand the need for the policy, it is a very narrow policy regarding nutrient neutrality and a more general consideration of water quality should be included either within this policy or elsewhere in the plan. Specifically the Environment Agency feel a direct reference should be made to water quality and the Water Framework Directive with its objectives to prevent deterioration of water quality and gain improvement where possible as this is important in a location such as Portsmouth where the marine environment is a key consideration for the city.

Homes England response states that to ensure consistency with current Natural England guidance ‘Advice on Achieving Nutrient Neutrality for New Development in the Solent Region’ (March 2020), Policy G3 should be modified as follows: *“Proposals (planning applications, permissions in principle, or prior approvals) for applicable development will only be granted permission where it can be demonstrated that the development can be ‘nutrient neutral’ for its lifetime, or it can be proven that new growth will not deteriorate designated sites”*.

The Isle of Wight Council supports the statement at paragraph 5.3.7 relating to the provision of mitigation measures to offset nitrogen output from new development. As set out in their own Position Statement on this issue, the Isle of Wight may be appropriate for ‘off-site’ mitigation to allow development on the mainland to take place. The Isle of Wight Council

is willing to work alongside third parties such as the Hampshire & Isle of Wight Wildlife Trust and PCC to provide a monitoring role for such mitigation sites located on the island.

Natural England welcomes this policy but advises that a nitrogen budget is calculated for the Local Plan that outlines the expected level of increased nitrogen that the Local Plan development will deliver. To accompany the Local Plan nutrient budget, Natural England strongly recommend that the Local Plan includes a formalised nutrient management plan or similar strategy that clearly sets out the mitigation options to be employed, including those following the Interim approach, to demonstrate how nutrient neutrality across the entire Plan period will be achieved. Where informed by a nitrogen budget, development proposals requiring mitigation should be accompanied by an appropriate mitigation scheme, which will need to be secured as part of any permission.

RSPB and **HIWWT** welcomes this policy and are pleased to see the Council will give a strong preference to the mitigation schemes that will deliver wider environmental benefits.

G3 Water Quality (Nutrient Neutrality) - Council response

This policy aims to ensure new development involving or generating new overnight stays are nutrient neutral. The responses to the regulation 18 consultation have further highlighted the importance of water quality for residents and wildlife. The majority of respondents agreed with the Council's approach to this policy including the Isle of Wight Council, RSBP and HIWWT.

The Council is currently updating its 'Interim Nutrient Neutral Mitigation Strategy' and in preparation for its regulation 19 consultation the City Council is revisiting this policy which requires some refining. This will take on board comments and suggestions made in response to regulation 18.

Policy Status: Amber

The Council welcome the responses and suggestions received and will carry out further investigations of the points raised and will refine the policy accordingly. This will also need to be clearly shown through the regulation 19 plan and supporting documents.

G4 Contaminated Land

To prevent unacceptable risks from contamination and land instability, 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.

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.

The Local Plan 2038 Regulation 18 consultation sought views on the approach the Council are taking on Policy G4 which seeks to ensure appropriate measures are undertaken to address long-term safety of the development in respect of land contamination.

Question 24a: Do you agree with the proposed approach to Policy G4?

	No. of respondents: 35
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Yes	26
No	4
Not sure/don't know	5
Question 24b: Do you have any further comments or suggestions about the suggested approach to Policy G4?	
	No. of respondents: 7

The responses to Question 24b included; ensuring adequate assessments are undertaken and that the long-term safety of former contaminated sites are monitored by the Council.

The **Environment Agency** are supportive of this policy, however, for clarity they suggest that the wording is altered to make it clearer that it refers to any land that is potentially contaminated not just that which is formally designated under Part 2A of the Environmental Protection Act 1990. The wording could be amended as follows, “*planning permission will only be granted for development on or near contaminated land or where the presence of contamination is reasonably suspected.....*”

G4 Contaminated Land - Council response

This policy aims to ensure appropriate measures are undertaken to address long-term safety of the development in respect of land contamination. The majority of respondents agreed with the Council's approach to this policy. The very low number of responses to question 24b are noted. The responses to the regulation 18 consultation highlight the importance of the long-term safety of former contaminated sites.

The Environment Agency are supportive of this policy, however, for clarity they suggest that the wording is altered to make it clearer that it refers to any land that is potentially contaminated not just that which is formally designated under Part 2A of the Environmental Protection Act 1990. The Council feel this suggestion seems reasonable and the policy will be amended accordingly.

Policy Status: Green

The Council welcome the responses and suggestions received through the regulation 18 consultation and will make minor changes to this policy.

G5 Flood Risk and Drainage

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 (EA) designated main rivers within Portsmouth: Great Salterns Lake to the east of the island and Farlington Marshes on the mainland.

National planning policy aims to ensure that flood risk is taken into account at all stages in the planning process, applying the sequential and exception 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.

Policy G5 sets out the policy relating to flood protection and prevention within the City. The Local Plan 2038 Regulation 18 consultation sought views on the approach the Council are taking on Policy G5.

Question 25a: Do you agree with the proposed approach to Policy G5?	
	No. of respondents: 36
Yes	22
No	9
Not sure/don't know	5
Question 25b: Do you have any further comments or suggestions about the suggested approach to Policy G5?	
	No. of respondents: 7

Overall the majority of the responses in relation to Question 25b were supportive of the Policy G5, though there were some which wish to see greater emphasis on encouraging natural or green flood prevention measures to support biodiversity and provide green infrastructure within the city.

Southern Water have suggested some amendments to strengthen the policy relating drainage which will ensure that the Local Plan supports the work they have undertaken to improve Portsmouth's sewerage systems resilience to withstand storm events.

G5 Flood Risk and Drainage - Council response
The overarching aim of Policy G5 is to ensure that new development is protected from flood risk and that drainage is sufficient to prevent future problems. The amendments suggested by Southern Water seem reasonable and the policy will be amended accordingly. With regards to more natural flood prevention the council already supports the provision of more green infrastructure within the plan and Policy G5 in its current form does not prevent such a scheme coming forward where it is deemed suitable.
Policy Status: Amber
The council has taken on board the comments received in relation to Policy G5 and make the relevant appropriate changes.

7. Sustainable Design & Heritage

D1 Design

Well-designed environments and development create better places in which to live, work, and visit, and a 'sense of place' for its users. 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.

As set out in draft Policy D1, the council will seek and promote an excellent standard and quality of design for all development in the city. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D1.

Question 26a: Do you agree with the proposed approach to Policy D1?	
	No. of respondents: 31
Yes	26
No	3
Not sure/don't know	1
Question 26b: Do you have any further comments or suggestions about the suggested approach to Policy D1?	
	No. of respondents: 22

Responses received in relation to Question 26b include: needs overriding policy for windows in conservation areas; should mandate EV charge points for all new development; consultation is important for every stage, particularly on accessibility matters; needs to be designed to reduce carbon emissions, net zero, generate clean energy, and enhance biodiversity; very broad policy that tries to cover a lot; adherence to strict environmental principles should underlie every design objective and decision; needs to reflect Policy D2; ensure incorporates 'Healthy Streets' criteria; policy doesn't consider if proposal is appropriate to the location, traffic, services, access, etc; city's conservation areas/assets have not been protected.

The **Guildhall Trust** comments include: support policy D1; the Plan understands 'brand Portsmouth', the nature of the built environment married to its maritime tradition. Clever and sympathetic design will continue to elevate the city, adding to its recent additions, especially in the city centre. Whilst a 'daytime' environment might appear pleasant and non-threatening, the evening landscape in the city centre can be imposing and less friendly. Does the Plan properly consider 'design and heritage' with reference to the night-time economy? Can '24/7' design be properly considered, therefore clever use of lighting which softens spaces and aids mental health and well-being. We support the proposals for policies in this section 'D1: Design', 'D2: Sustainable Design and Construction', D5 'Heritage and Archaeology' and D6: Heritage Enhancement'. However, a sense of 'the city by night' might be worth considering within the various statements and considerations. An attractive city by night could be as powerful to visitors and community as the one they observe by day.

Hampshire Police comments include:

- would ask that Paragraph 6.1.8 is amended to read as follows, or with words conveying the same meaning: “Where appropriate applicants are expected to engage and work with those affected by development, the wider local community and for major development with Hampshire Constabulary, in order for them to respond to and evolve the design of schemes.”
- Paragraph 6.1.11 deals with major developments and we would asked that it is amended to read as below, or with words conveying the same meaning: “Large-scale major developments should be supported by detailed masterplans or development frameworks and, where appropriate, design guides or codes. Such tools and documents are expected to be produced in collaboration and consultation with the community and Hampshire Constabulary.”
- We would ask that, Policy D1, sub paragraph m, is amended to read as below, or with words conveying the same meaning: “All development must reduce the opportunities for crime and disorder by effective use of the Crime Prevention Through Environmental Design (CPTED) principles.”
- Creating a safe environment for the individual and communities necessitates reducing the opportunities for crime and disorder. It is important that the opportunities for reducing crime and disorder are identified and incorporated at the very earliest stages of the design process. We would ask that some wording highlighting the requirement for development to reduce the opportunities for crime and disorder is incorporated into the Portsmouth Local Plan. Mitigating the effects of poor design can never be as effective at preventing crime and disorder as good design.

PCC Coastal, Highways, and Drainage Team recommend referencing surface water design guidance within this policy.

Historic England comments include: not sound - inconsistent with national policy (NPPF 16(d)); Clause 1 uses 'and/or' on two occasions. This implies there is a choice between employing excellent architecture or urban design. The same is true regarding site context and heritage. This is ambiguous and therefore inconsistent with NPPF paragraph 16(d). Clause 2 also uses 'and/or', which causes the same problem. The word 'or' should be deleted in both the first and second sentences of clause 1 and the first sentence of clause 2.

Woodland Trust comments include: support the policy in particular criterion h); integrating trees and green spaces into developments early in the design process minimises costs and maximises the environmental, social, and economic benefits that they can provide. Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).

Portsmouth Climate Change Action Board comments include: would like the criteria 'to achieve excellent design' to reflect Policy D2, e.g. the criteria could insist on zero/low carbon construction materials and techniques such as timber and Passivhaus design methods, or energy efficiency measures such as insulation and low carbon heating such as heat pumps or district energy schemes.

Portsmouth Labour Group indicated support for the policy.

Design coding

The updated National Planning Policy Framework (July 2021) states that local planning authorities should prepare design guides or codes consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes are a set of illustrated design requirements that are visual and numerical where possible to provide specific, detailed parameters for the physical development of a site or area. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances, scale of change in each place and should allow a suitable degree of variety. The code can be applied on several different scales such as city-wide, area types, development sites or on specific plots.

Question 26c: Do you think design quality in Portsmouth would benefit from having a city-wide design guide or code?	
	No. of respondents: 30
Yes	18
No	3
Not sure/don't know/comment	9

Abri Group comments include: the use of design codes should be proportionate to the expected level of development and therefore may not be appropriate on a city-wide scale. Should any design codes be appropriate for Portsmouth, these should be targeted to distinct areas in order to prevent unintended delays to development.

The **Milton Neighbourhood Forum** indicated support.

Home Builders Federation comments include: A city-wide design code would provide clarity for developers as to the expectations of the Council and potentially improve the consistency of decision making. However, it will be important that the Council involves the development industry in the development of any design code to ensure it is both effective and deliverable.

Historic England comments include: a city-wide design guide or code may be beneficial to some extent, but given the size of the city, the range of types of existing and planned development and the varied issues the built environment faces, a city-wide design guide or code risks being too general to be of real use to the promotion of design quality; a more focused approach may achieve more to improve design quality in Portsmouth. Such an approach should take account of existing issues and areas where significant potential for change is likely. The city centre may be such an area; areas that are sensitive to change such as conservation areas should also be prioritised. This would require an audit of the guidance available for all existing conservation areas. Such an audit would identify which conservation areas do not have any associated guidelines; the council should consider comprehensively updating guidelines for all conservation areas so that they reflect current national guidance, with particular regard to the strengthened guidance on design.

Woodland Trust comments include: support having a city-wide design code, including delivering the emerging requirement for tree-lined streets. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats. This will make a positive contribution to requirements for net gain and nature recovery, as well as better reflecting the aspirations of the England Trees Action Plan and National Model Design Code.

Question 26d: Alternatively, what scale do you think any design guides or codes should be applied in Portsmouth?	
	No. of respondents: 12

Responses to Question 26d include: should encourage diversity and innovative approaches; area scale but should be linked; need to consider local area and city's heritage; hard to identify a general style/material that characterises the city; emphasis should be on quality and space, with a reference to more local interpretation expressed through conservation areas; use of street design or public space codes; reference to other design codes such as those produced by English Heritage or Healthy Streets; suggest scale should be at 'village' level; suggest scale should be to particular town centres; 'guide' needs to be relevant and maintained; each area of Portsmouth will need its specifics.

Question 26e: What areas or aspects of Portsmouth's built environment and public spaces do you think could be improved through setting design requirements?	
	No. of respondents: 20

Responses to Question 26e include: unattractive dwellings in conservation areas; mention of Buckland; ensure any new tall buildings are suited to other uses - design needs to be flexible enough to meet alternative tenures; maintain Victorian appearance of many buildings; all development in the city; mention of the seafront; would give Portsmouth its own distinctive style if designed correctly; create something people will be proud to work or live in; celebrate the maritime heritage; mention of the city centre; ensure all new development respect the existing building environment and heritage of the city; requires strong enforcement measures where standards are not met and completely change the streetscape; mention of local, district, and city centres; mention of area in front of Portsmouth and Southsea railway station; street/public space design code needed; mention of development sustainability and carbon impact; mention of Southsea and Old Portsmouth.

Office of the Police and Crime Commissioner for Hampshire (Cllr Luke Stubbs) comments include: There have been consequences from a lack of clear design framework for the public realm to date. E.g. paving at the former Chaucer House site does not match that at any other location. This fragmentation reduces the benefits obtained from repaving works. The Victoria Park scheme will connect to a quality stretch of paving from the Catherine House development. There will at some point be a redevelopment proposal on the site by the station and perhaps a repaving scheme at the station itself. The street furniture and paving should be consistent across all these sites. Southampton have had a much stronger policy on public realm for some time. Their streets and spaces framework specifies in some detail what will be acceptable, both on the public highway and which will generally be accepted within private developments. Portsmouth should have a similar policy.

D1 Design - Council response
National policy on design has now had a shift-change in the emphasis on the role of design in the planning system. NPPF para 128 states that 'the creation of high quality, beautiful, and sustainable buildings and places is fundamental to what the planning and development process should achieve'. Moreover, community

engagement and reflecting local aspirations, especially in the production of policies, design guides, and design codes is considered an essential part of the process. There is also specific reference in the NPPF on preparing design guides and codes to be consistent with the published National Design Guide and National Model Design Code.

Draft Policy D1 promotes the use of design and access statements where required. Although these still have a role in setting out the narrative for the design approach and rationale for a scheme, these should not be solely relied upon to support a development proposal. Other assessment tools and processes are now expressly advocated by national policy - such as processes for design guides and design codes; assessment frameworks like Building for a Healthy Life; workshops with local communities; and assessment processes like Design Review Panels.

Policy Status: Green

It is considered that the draft policy needs minor amendments and further refinement to take into account relevant suggestions from the consultation, closer alignment with National Design Guide principles, and to place stronger emphasis on the role of community engagement, and utilisation of design assessment processes/tools such as design guides, design codes, Building for a Healthy Life, design review panels, etc. - and away from solely relying upon Design and Access Statements to support development proposals.

D2 Sustainable Design and Construction

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 wellbeing) of how buildings are designed and used, as well as the construction process itself.

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.

Policy D2 of the New Local Plan addresses the importance of sustainable design and construction practices to ensure the built environment is resilient to the impact of climate change. This policy sets out several sustainability standards that should be met by certain developments in order to achieve the highest level of sustainability.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D2.

Question 27a: Do you agree with the proposed approach to Policy D2?	
	No. of respondents: 34
Yes	23
No	4
Not sure/don't know	7

Question 27b: Do you have any further comments or suggestions about the suggested approach to Policy D2?

No. of respondents: 20

Of the 20 respondents in relation to Question 27b, five comments supported the inclusion of this policy given the critical importance of delivering sustainable development. **Portsmouth City Council Coastal and Drainage Team** agreed with the methods of minimising water use and the **Woodland Trust** particularly supported the use of green/blue infrastructure designed to cool sites.

Four responses, including from the **Portsmouth Labour Group** felt however that the standards should be raised, for example new residential development meeting a 4-star rating as opposed to a 3 star rating. The Portsmouth Labour Group asked how these measures were decided upon. Three further comments questioned the use of 'weak' and 'vague' language including 'seeks to', 'encourage' and 'consideration'.

Additional comments focussed on the cost implications. **Historic England** were concerned about the cost implications for all conversions and change of use to meet 'Very Good' under the BREEAM Refurbishment and Fit Out standard. **Abri Group** further questioned the concern that BREEAM excellent on major new residential development had not been assessed in the 2020 viability report.

Another comment raised by **Portsmouth Climate Action Board** was to ensure that design/retrofitting to deliver low carbon buildings does not mask an increase in greater pollution emitting activities elsewhere. This could be linked with another comment requesting a holistic approach to be taken and engagement with other sectors.

Further comments raised the need for monitoring of carbon emissions to help builders and developers outline the reductions that there will be.

D2 Sustainable Design and Construction - Council response

This policy has been informed by evidence including the Mitigating Climate change through the local Plan Background Paper (2021) and the Adapting to Climate Change through the Local Plan (2021) Background Paper.

Within the accompanying text to this paragraph, it is outlined that the highest possible standards of sustainable design and construction are expected. The standards that are set out in policy are a 'minimum' that are to be achieved.

The language used within this policy replicates that of national guidance which outlines plans 'should' take a pro-active approach to mitigating climate change and new developments 'should' be planned in a way that 'can help' reduce greenhouse gas emissions. Paragraph 157 of the NPPF further states "in determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable"

The Portsmouth Development Viability Assessment (2020) states "The additional cost of building to BREEAM Very Good standard is negligible as outlined in research" and "The additional costs of BREEAM Excellent standard ranges from just under 1% and 5.5%, depending on the nature of the scheme with offices being a

little under 2%. It is assumed that new non-residential development will be to BREEAM Excellent and this increases the construction costs by 2% or so."

Throughout the production of the plan, a holistic approach is taken to ensure Policies across the plan will mitigate any impact that retrofitting may have on increasing overall carbon emissions in the city.

Policy Status: Green

Overall this policy is considered to be suitable, with only potentially minor amendments needing to be made.

D3 Pollution, Health & Amenity

Alongside many other busy cities around the UK, Portsmouth has been identified as a city that needs to reduce air pollution levels as quickly as possible. In response, the council has prepared a Local Air Quality Plan, working closely with government's Joint Air Quality Unit (JAQU), to achieve compliance with legal limits for nitrogen oxide (NO2) in the shortest possible time.

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 wellbeing needs.

The Local Plan 2038 Regulation 18 consultation sought views on the approach the Council are taking on Policy D3 which seeks to ensure that consideration of all aspects of health and wellbeing are integrated into the design and construction all proposals from the outset.

Question 28a: Do you agree with the proposed approach in Policy D3?	
	No. of respondents: 29
Yes	24
No	3
Not sure/don't know	2
Question 28b: Do you have any further comments or suggestions about the suggested approach to Policy D3?	
	No. of respondents: 21

The responses to Question 28b included; this should only be applicable to developments of two dwellings or more; the wording in this policy is too generic; design has a part to play in improving air quality but the way to address nitrogen dioxide pollution is through traffic regulation, not design; encouraging transport links to discourage further car ownership should be included; policy D3 is the first real mention of air quality which as one of the Local Plans key themes and therefore should be front and centre; the first paragraph of the policy may need further clarification to prevent all applications being disproportionately burdened without clear direction - the PPG expects plan-making to take a strategic approach; translating this to this draft policy should take account of the identified area-specific air quality issues and sources of air pollution; and this policy should relate directly to climate change.

Natural England advises that Policy D3 incorporates a requirement for impacts on the natural environment to be considered as well as human receptors. In particular, Policy D3 should address the traffic impacts associated with new development, particularly where this impacts on Habitats sites and SSSIs. The environmental assessment of the plan (SA and HRA) should consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.

NHS Property Services response stated that is a well-established connection between planning and health; in so far that the planning system has an important role in creating healthy communities. Planning can not only facilitate improvements to health services and infrastructure, thereby enabling health providers meet changing healthcare needs, but also by providing a mechanism to address the wider determinants of health. NHS Property Services therefore supports Policy D3.

Portsmouth Climate Action Board response asked to see air quality in policy D3 to stipulate:

- i) the projected vehicle use of residents occupying any new development.
- ii) the impacts on the existing local community as well as new residents.

D3 Pollution, Health and Amenity - Council response

This policy aims to ensure a high standard of amenity for existing uses and future users / occupiers. The majority of respondents agreed with the Council's approach to this policy with responses to the regulation 18 consultation highlighting the importance improving air quality within the City. Responses also noted the generic wording of the policy, the need to clarify aspects of the policy and relating to transport and climate change.

In preparation for its regulation 19 consultation the City Council will seek to refine and clarify aspects of this policy. This will take on board comments and suggestions made specifically on sites in response to regulation 18.

Policy Status: Green

The Council needs to carry out further investigation of a number of the points raised and may need to make some minor changes to the policy positions to reflect the comments made and the results of that investigation.

D4 Lower Carbon and Carbon Neutral Development

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.

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.

Policy D4 of the New Local Plan raises awareness of the importance for delivering net zero emissions of greenhouse gases. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D4.

Question 29a: Do you agree with the proposed approach to Policy D4?	
	No. of respondents: 26
Yes	17
No	4
Not sure/don't know	5
Question 29b: Do you have any further comments or suggestions about the suggested approach to Policy D4?	
	No. of respondents: 16

There were 16 responses to Question 29b, with the most focus on the wording of the policy and the provision of Carbon Offsetting. The concern for the former of these two was that it was felt the policy was not direct enough, and vague in places with the use of wording such as "demonstrate they have explored"; "Where this is possible" and "where practicable and viable". **Portsmouth Climate Action Board** felt these could risk the policy being rendered ineffectual.

Comments were also submitted that raised concerns for the use of Carbon Offsetting, including a response from **Milton Neighbourhood Forum**. There was concern that the use of offsetting would mean developers would exploit this option as opposed to delivering sustainable development.

Other comments raised the need for further efforts to be concentrated towards reducing carbon emissions further than those set out in building regulations and on improved transport sustainability (including comments from **CPRE Hampshire**) through reducing reliance on car journeys and more electric vehicle charging points. A comment was also raised regarding an update to the 2020 viability report to test the policy expectation to ensure the standards do not affect the delivery of affordable housing.

Natural England comments welcomed the approach towards Policy D4, although recommended "*that Local Plan policy recognises the role of the natural environment to deliver measures to reduce the effects of climate change.*" In addition, they proposed four specific actions to be included within the policy as follows:

- *Set an ambitious climate-specific targets within the Policy for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050;*
- *Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on open priority habitats must be avoided.*
- *Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.*
- *Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.*

Two further questions were asked in relation to policy D4 as outlined below with regards to carbon-offsetting. Half of the respondents to question 29c agreed that residual/unmitigated carbon emissions within major developments should be offset through a contribution to a Carbon Offset fund. When asked whether a fee of £95 per tonne per annum for the required period was appropriate, the majority of respondents were unsure.

Question 29c: Should the Council require major development to offset any residual/ unmitigated carbon emissions through a contribution to a Carbon Offset Fund?	
	No. of respondents: 26
Yes	12
No	4
Not sure/don't know	9
Question 29d: If a contribution is required to the Carbon Offset Fund, do you agree with the suggested rate of £95 per tonne per annum for the required period?	
	No. of respondents: 27
Yes	10
No	7
Not sure/don't know	10

D4 Lower Carbon and Carbon Neutral Development - Council response

This policy has been informed by evidence including the Mitigating Climate change through the local Plan Background Paper (2021) and the Adapting to Climate Change through the Local Plan (2021) Background Paper.

The council will take on board the comments raised with regards to the wording of the policy, however similar wording is used throughout the NPPF including 'the planning system *should support* the transition to a low carbon future', 'new developments *should* be planned for in ways that *can help* reduce greenhouse gas emissions' and 'LPA's should expect new development to *take account of*'.

The evidence behind the adoption of carbon-offsetting has been set out within the Mitigating Climate Change through the Local Plan Background Paper (2021) and states Carbon off-setting should only be explored once all carbon reductions through the above approaches have been undertaken. The rationale behind the cost, based on research into the levels set by other authorities, is that the price needs to be price is set high enough for developments not to be unviable, but not too low that this option would be more attractive than including direct measures for carbon reduction.

In response to the comments regarding improved transport sustainability, policy C3 specifically encourages the reduction in the need to travel and an uptake in the use of walking, cycling and public transport in line with the council's Local Transport Plan 4. This policy further outlines the need for sufficient space and infrastructure to deliver charging for electric vehicles.

While this draft policy represents the Council's aspirations for low carbon development, it should be noted that the ability for Local Plans to set bespoke, higher energy standards for new development may be superseded by changes to

Building Regulations, and this policy may therefore need to be reconsidered in due course.

Other areas of the Local Plan discuss how carbon can be reduced via other methods not relating solely to development. E.g. increasing Green Infrastructure (Policy G2) (Green Infrastructure) has a role reducing carbon emissions through the cooling of urban areas, providing more attractive routes for walking and cycling, filtering and buffering pollutants.

This policy will be subject to viability assessment as the Plan progresses and will indicate whether requiring such standards would impact on affordable housing provision.

Policy Status: Amber

Further assessment of the potential for carbon offsetting requirements will be undertaken to support the policy (including updated viability assessment) and the policy wording will be updated or clarified in response to the comments as necessary.

D5 Heritage and Archaeology

The city’s numerous heritage assets⁶ 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.

Policy D5 applies 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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council’s approach to Policy D5.

Question 30a: Do you agree with the proposed approach to Policy D5?	
	No. of respondents: 25
Yes	15
No	4
Not sure/don’t know	6
Question 30b: Do you have any further comments or suggestions about the suggested approach to Policy D5?	
	No. of respondents: 18

⁶ Heritage Assets include designations such as Conservation Areas, listed buildings, Scheduled Ancient Monuments, and Historic Parks and Gardens

Overall the comments submitted in relation to Question 30b were supportive of the Policy D5. **Historic England** however feels that the draft policy in its current form is inconsistent with national policy (NPPF paragraphs 199-205). This is because they feel the draft policy does not reflect the staged approach that is set out in NPPF Chapter 16 and some components of the NPPF approach are completely absent from Policy D5.

Furthermore, D5 makes no provision for proposals that would result in less than substantial harm to designated heritage assets, or effects on non-designated heritage assets. The concepts set out in NPPF paragraphs 204 & 205 should also be incorporated into the policy for completeness. Policy D5 should be amended to reflect NPPF.

D5 Heritage and Archaeology - Council response

The overarching aim of Policy D5 is to protect the heritage assets and their setting within the City. Comments raised by Historic England have been noted and the Council will engage with Historic England as necessary to ensure that the policy is in compliance with the NPPF.

Policy Status: Green

Minor amendments will be made to the policy wording as necessary.

D6 Heritage Enhancement

Portsmouth has a significant track record, going back many years, of pursuing and implementing opportunities for the creative re-use of heritage assets. 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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D6.

Question 31a: Do you agree with the proposed approach to Policy D6?	
	No. of respondents: 27
Yes	23
No	0
Not sure/don't know	4
Question 31b: Do you have any further comments or suggestions about the suggested approach to Policy D6?	
	No. of respondents: 9

Overall the comments on the approach to Policy D8 were largely positive

Comments included requests for reference to the city's museums, more emphasis on historic streetscapes, outlooks and setting, greater management of the existing Conservation Areas, potential for grants to owners of heritage assets and reference to consequences for damage or demolition of heritage assets.

There were a couple of comments encouraging the Council to regard the historic environment and ensure those assets are protected sufficiently.

D6 Heritage Enhancement - Council response

The overarching aim of Policy D6 is 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. The Council welcomes the support and suggestions for this draft policy.

Policy Status: Green

Overall this policy is considered to be suitable, with only potentially minor amendments to reflect any changes.

8. Strategic Development Sites

S1 Portsmouth City Centre

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.

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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S1.

Question 32a: Do you agree with the proposed identity areas and key opportunities for the regeneration of the city centre?	
	No. of respondents: 52
Yes	37
No	11
Not sure/don't know	4
Question 32b: Do you have any further comments or suggestions about the suggested identity areas and key opportunities for the regeneration of the city centre?	
	No. of respondents: 39

Responses to Question 32b include: Parking-related issues; more cultural and leisure facilities/uses; more health/community facilities; more Green Infrastructure; need for more housing; negative comment about identity area name(s); public transport issues; improved retail; employment uses; negative comment about design/aesthetics of building or public realm; negative impact of city centre on city reputation; negative comment about University; more food and beverage provision; wider scope needed; higher density/scale needed; encourage active modes of travel; negative comment about proposed housing numbers; negative comment about student accommodation; shift away from retail focus.

University of Portsmouth welcomes the proposals to enhance the vibrant nature of the city centre, which is critical for the University. The University also strongly supports the statements made in paragraphs 3.6.5, 3.6.8 and 3.6.11 and would welcome proposals to support these ambitions to address the issues raised; the vision and site specific proposals for the area are broadly supported by the University. Identifying this area does however demonstrate how an opportunity is being potentially missed by not including the wider parts of the city centre campus as a specific strategic development site and/or campus designation. This can be linked to the University's masterplan as a guide to the level of growth that can be achieved. For the reasons already explained, it will also provide a basis to inform and support the consideration of future planning applications.

Persimmon Homes comments include:

- The Policy does not clarify across what period the proposed number of units is expected to be delivered.
- Paragraph 3.31 of the Housing and Economic Land Availability Assessment (HELAA) (July 2021) indicates that the combined capacity of the City Centre sites is 5,183 new homes. This correlates closely with the lower end of the range set out in the Policy S1, but does not reflect the disaggregated supply data set out in Table 2 of Appendix 1 of the HELAA, which suggests that only 4,934 dwellings can be delivered from City Centre Sites across the period 2020/21 – 2041+.
- In light of the Council's own evidence base, the expected capacity of SP1 should be expressed as an 'aspirational' range of between 4,934 to 6,128 dwellings.
- Whilst it is accepted that Local Plans should be aspirational, they must also be deliverable.
- Whilst it could be reasonably argued that the City Centre sites are potentially suitable for housing, the same cannot be said with regards to their availability and viability within the plan period.
- Turning to viability, the Council has produced a Development Viability Assessment (October 2020) that supports the publication of the Draft Plan. Whilst we have not interrogated the assumptions underpinning this model in detail, it is clear that that the City Centre area high density development (as has been proposed in the Plan and the Council's City Centre) is unviable.
- If one looks at the availability of sites in the City Centre, multiple ownership exists. The Council has provided no evidence to indicate that the various landowners are willing to bring forward their land forward for regeneration nor an assessment of legal impediments regarding the sites' delivery.
- Portsmouth City Centre Masterplan Supplementary Planning Document (SPD) was adopted on 7th January 2013 - even with this specific SPD the area has failed to provide a meaningful number of additional dwellings.
- In conclusion, using the Council's own evidence alongside Persimmon's own analysis, it is clear that, for the most part, there is currently little appetite for landowners to explore redevelopment of their property in the City Centre area.
- Based on the above, the Policy S1: - Portsmouth City Centre is not deliverable/developable and should not therefore be counted towards the Council supply set out in Table 2 of Policy H1. This will leave a significant shortfall that will need to be addressed elsewhere in Portsmouth or in the neighbouring areas as part of the duty to cooperate.
- Therefore, Policy S1 – Portsmouth City Centre, fails the Test of Soundness as the policy is not justified as an appropriate strategy when considered against proportionate evidence as illustrated above. It should also be considered as not being effective as there is no evidence supporting prompt deliverability.

Historic England comments include:

- We have a number of concerns about the approach to this policy and the associated City Centre Development Strategy (CCDS). We consider that this policy is currently not sound.
- While we understand the intent to regenerate the city centre and recognise that it is a sustainable location for growth, we are concerned that Policy S1 is very high level, in

terms of setting out development parameters, with most of the detail set out in the CCDS.

- We accept that the local plan cannot contain all the requisite detail, but we are not clear on the council's approach to consulting on and developing the CCDS, nor whether it will indeed be adopted as a supplementary planning document. This is concerning because the CCDS has the potential to usher in significant change in Portsmouth.
- We would prefer to see a set of development sites identified in the local plan itself, rather than the area-based approach currently employed. This would ensure that sites are given due scrutiny through the plan-making process.

Portsmouth Cycle Forum comments include:

- PCF welcomes the broad approach to the redevelopment of the City centre, especially the desire to reduce the requirement for private motor transport within it. However, as with our comments about Sustainable Transport Policy, there is a lack of confidence in the ability of PCC to actually deliver the vision outlined within 'the 15-year implementation horizon'.
- We absolutely agree and approve of the following:
 - The overall pedestrian and cycling network is of mixed quality and discourages walking or cycling across the city centre.
 - Large parts of the city centre are currently car-dominated at the expense of good placemaking and environmental quality...There are clear benefits to reversing this pattern with a fundamental shift to creating places for people.
 - The master plan area should be designed for pedestrians first and public transport second.
- We are however concerned that the main gateway to the north does not acknowledge the Transport Assessment requirements of the junctions currently in place based upon the projected increases in use.
- Vehicles arriving from the M275 will enter place-based streets which are multi-modal. There are currently seven lanes of carriageway at Mile End Road but we do not see any way in which through traffic to either the seafront, Isle of Wight Ferry or Gunwharf Quays will be reduced to the level required to make the 'People Friendly Streets' a reality. We do acknowledge that the removal of public car parking is a disincentive to travel into the city centre. However we are assuming that Cascades car park will remain in at least the medium term for this strategy.
- The existing city centre is particularly poor for direct walking and cycling permeability and connections. It is also important that future routes should be designed for connectivity in both directions. Just because it works in one direction does not necessarily mean that it is as simple when travelling in the opposite direction.
- There should be more awareness about connecting the city centre walking and cycling routes through the international port. Foot and cycle passengers for europe-bound services are likely to arrive by train at either Portsmouth and Southsea (which has the added issue of accessibility from its high level platforms) or Portsmouth Harbour.
- A well designed and signposted route should be highlighted through the city centre.

Portsmouth Labour Group comments include:

- There has so far been wholly inadequate community engagement around the proposals being brought forward for the city centre. We believe strongly that existing residential communities and businesses in the vicinity should be closely involved in the regeneration of the area so that it is ensured that the new development complement and corresponds to what is already there as opposed to being inserted into the area in isolation.
- Given the council will be the landowner of this site it is essential that significant levels of affordable housing, well in excess of the 30% required of a private developer, are delivered.
- We are also concerned about the potential for reduction in employment and enterprise space and would request wherever possible consideration is given to protecting commercial or community use at ground floor level with residential properties built above.

Union4 Planning comments include:

- Redevelopment of the identified city centre area, as set out at section 7, is strongly supported. The area comprises previously developed land in an accessible location and is therefore clearly suitable for a diverse mix of uses and should be the focus of higher density development and the provision of a significant number of new homes.
- Whilst the 'Location for Tall Buildings' designation has been removed since the 2012 iteration of the proposals map, a precedent for tall buildings has been established in this central area with a number of recently completed developments and planning consents, including student accommodation at Catherine House, Stanhope House, and Crown Place, rising to 28 storeys in some cases. As such, it is considered that there is significant scope for sites within the identified centre (zones A-E) to accommodate tall buildings, particularly around Portsmouth and Southsea Station.
- As such, the principle of the Identity Areas as the focus of development and the ambition to provide significant additional residential units and employment floorspace within this central area is supported. It is however considered that the focus should be on accommodating taller (subject to achieving high quality design), residential led development across the Identity Areas, as far as possible, as it is clear that the CCDS document is already fairly dated in terms of building heights, built form and land use, with recent consents coming forward which deviate significantly from the draft masterplan.
- Paragraph 7.1.24 of the emerging Local Plan centres development around public transport provision, particularly the train station and bus network. On this basis, it is considered that the sites immediately to the north of the railway tracks are key to delivering this vision, being in closest proximity to both the train station and major bus route and being suitable for landmark development which would act as a way-finder.
- At present, there is no real 'arrival' point for those arriving at and exiting Portsmouth and Southsea station, with immediate views on arrival, towards the city centre, comprising the Matalan warehouse style building and an open car park, contrary to the 'Big City Arrival' point as sought by the CCDS.
- On the southern side of the station, the Unite Student Housing development on Greetham Street rises to 25 storeys and acts as a key marker for the station and landmark building, stepping up in height towards the western end of the site, nearest

the station. This is considered in the CCDS document as being a ‘Standard Bearer’ of city identity.

- Given the above, the CCDS document misses the opportunity to optimise development in this location, proposing medium rise development to the north of the station and to the north of Station Street. Approval and emerging schemes to the north of Station Street already significantly exceed some of the heights discussed in the CCDS, so to a degree, the evidence base document, adopted in January 2021, is already outdated.
- Whilst there is a clear requirement to respect the listed station and its setting, development to the north of the railway line should look to mirror that already completed to the south, in terms of general bulk, scale and massing, creating a strong arrival point at the heart of the city and a crescendo in building heights around this key transport hub. The indicative masterplan, suggesting heights in the region of 8-10 storeys to the north of the railway line significantly misses this opportunity to landmark the station and provide a high density of accommodation on a highly sustainable site.

Question 33a: Do you agree with the proposed overarching principles for the redevelopment of the city centre?	
	No. of respondents: 43
Yes	32
No	9
Not sure/don't know	2
Question 33b: Do you have any further comments or suggestions about the proposed overarching principles for the redevelopment of the city centre?	
	No. of respondents: 43

Responses to Question 33b include: support local businesses and industries; negative comment about student accommodation; improved retail; improved rail; negative comment about proposed housing numbers; improved road/street design; utilise Site A (Landport Gate) for Port development; conserve/enhance heritage assets; higher density/scale needed; higher design standards needed; population density already too high; encourage active modes of travel; more Green Infrastructure; negative comment about University; comment about lack of detail in Plan; regenerate existing buildings/facilities; develop priority/affordable housing only; parking-related issues; public transport issues; low carbon emissions; better transport access needed; better mobility accessibility needed.

The Guildhall Trust comments include: Overall, the Plan recognizes that there is a serious imbalance of retail, accommodation, and business opportunities across the city. The current provision of retail in the city centre is generally sub-standard and does little to encourage local people and visitors to value it as a 'destination'. We welcome new development in the town centre especially the mix of accommodation alongside an improve retail, leisure, and entertainment offer. As operators of the Guildhall, we feel that improvements and additions to our facilities including new commercial restaurants will aid local regeneration and prove to be a driver for further development in and around Guildhall Square.

Portico Shipping Ltd comments include:

- Introducing higher residential buildings within relatively close proximity (as suggested in para 7.1.12) would, over time, introduce potential conflicts (visual amenity, light, acceptable neighbourly uses) and could impede the longer term future activities of the Port. This risks longer term detrimental impact on the local economy.
- Supporting Document “Economic Employment and Commercial Needs etc” concludes that there is a shortage of industrial and logistics accommodation (para 4.40) and it is surprising that this has not been considered for the areas adjacent to the Port, being a “key hub”, in this Policy.
- The Policy makes little reference to the themes of the “Portsmouth Economic and Regeneration Strategy 2019-2036” (Supporting Document). This study recognises the benefits of the Port and outlines the ambition to “Create a marine and maritime engineering and/or clean growth innovation quarter.” The Policy appears to ignore much of the analysis and conclusions of this study.
- The Port forms an important part of the “Solent Freeport” announced by the UK Government early in 2021. This is a significant initiative, considered further under Employment Policy below, and requires Portsmouth City Council to consider future port growth and needs if it is to benefit. Areas included in Policy S1 would be well suited to this initiative by reason of their proximity to the Port, Portsmouth University, and major highways. It would be a significant oversight, in our view, if the wider Freeport needs were not also considered as part of this strategic development opportunity.

Vanguard Storage Services Ltd (via agent) comments include: Overall and subject to consideration of the above the overall principles are agreeable; While the Council’s need for housing is noted, this also needs to consider the relevant parts of the NPPF and also look more closely at the promotion of mixed uses and solutions and uses which are complementary.

University of Portsmouth comments include:

- When the level of development that is identified in the University’s masterplan in those areas not identified in the current Local Plan is then added to the capacity identified in the CCDS, the net increase in education floorspace that can be achieved in the area will far exceed the 700 sq.m identified in Policy S1. The level of investment and benefits that will ensue from this development will make an important contribution to the regeneration and growth of the City Centre. It is therefore essential that the campus area is identified specifically as part of the City Centre to provide a framework for this growth.
- The identification of the University in Area E criterion v. is welcomed together with how a positive approach will be taken to opportunities for enhancement and estate development. For the reasons already explained, the University’s ambitions and city centre campus is not limited to this area so it should be extended to include the overall campus.
- The University support the vision as set out in the section 4 of the Consultation Document, in particular the encouragement of cycling and walking routes, ensuring the city is safe for both cyclists and pedestrians. The reduction in the overall dominance of the car is also welcomed (see paragraph 4.3.18). The University also

welcomes the approach towards an integrated and sustainable public transport system, removing barriers to walking, cycling and public transport (see paragraph 4.3.37).

Morrisons (WM Morrison Supermarkets Plc) (via agent) comments include:

- Overall, Morrisons supports the ambitions of the Council, the intentions to create a 15 year development vision for Portsmouth City Centre and in particular the significant growth requirements. We would like to raise a number of points to ensure the future of the Morrisons store continues to provide an important facility to local residents.
- The existing Morrisons store has a floor area of approximately 5,000sqm (54,000sqft), which provides services to local residents and the wider population of Portsmouth. As such, Morrisons may seek to deliver a replacement store of a similar scale should the site come forward for redevelopment. This would also include a home delivery function, the demand for which has increased significantly over the past 12 months. The delivery of a store will allow for the continued provision of essential goods to residents of Portsmouth.
- Morrisons have also committed to Net Zero greenhouse gas emissions by 2040 and they recognise the way they build new stores will play a significant role in meeting this target. Morrisons are we're looking at a whole range of measures including including photovoltaic roof panels, heat pumps, electric vehicle charging, rainwater harvesting and better cycle facilities
- We note the Council wish to deliver a shift towards sustainable transport (as per principle viii and draft Policy C3), which Morrisons supports. However, the availability of customer parking in safe and convenient locations is vital to the operation of Morrisons supermarkets. We would stress the importance of adequate levels of parking for the use of customers as this is essential to the operation of Morrisons supermarkets.

Public Health England comments include:

- All being well, the correct use of preceding policies should mean that all strategic development considers health and wellbeing issues as a matter of course.
- Public Health are already engaged in ongoing work on several strategic sites and have previously made representations to consultations for Cosham, St James' and Tipner, but to highlight the key messages:
 - Air quality, reducing vehicle dominance and car use must be a priority for all strategic sites, but particularly those already in higher density areas of the City.
 - There is a clear expectation that Strategic Development site proposals pay close attention to, and clear adherence with, the Health Pollution and Amenity Policy.
 - I note that the strategic site policies all refer to active and sustainable travel infrastructure, but question where the overarching policy provision is to ensure that they're all connected and that wider infrastructure improvements are made beyond site boundaries to enable a high quality, functioning network?

- All strategic sites need to ensure they are providing opportunities for, and not adversely impacting upon, existing communities - this can be addressed through Health Impact Assessment.
- For all strategic sites, Public Health fully supports proposals for off-road active routes (particularly emphasised in Policy S3: Fratton Park and the Pompey Centre). Further policy provisions for clear segregation between cycles/scooters and pedestrians are encouraged wherever possible, as well as the role of greening to be recognised as a way in which to improve the amenity value of these areas (to encourage walking and cycling).

Question 33c: Would you like to see a clear design identity across the city centre (or within each identity area), or more design variation?	
	No. of respondents: 46

21 respondents indicated support for a 'clear design identity across city centre'. Comments include: would tie the areas together; standard design focusing on Portsmouth's naval history with a modern application; as long as it's sympathetic with older or historical buildings.

5 respondents indicated support for a 'clear design identity within each identity area'. Comments include: more specific statement to exactly what will be built and where.

7 respondents indicated support for 'more design variation'.

Respondents provided other comments, including: negative comments on state of Commercial Road/City Centre; need for more retail; positive comment on proposed Fusion scheme on Arundel Street; good to have Portsmouth identity but areas have individual styles; iconic designs for key features - 'low-key'/restrained for rest; too large an area for too prescriptive design identity - innovation and creativity should be encouraged in the centre; coherence would indicated vision and purpose - conformity is boring; approach city centre holistically - make pedestrianised, cycle-friendly with no vehicles apart from public transport/deliveries; utilise 15-minute neighbourhoods concept and high-quality public realm.

Vanguard Storage Services Ltd (via agent) comments include: While the press for design codes, and "beauty" is noted this needs to respond to market demand and the type of development which is come forward. In key locations as noted by the PCCDS schemes should seek to be of high quality and landmarks to the various entry points. The design typology should be city wide and high quality and should not seek to control or stifle innovation.

Question 33d: Do you agree that the average height of development should be six storeys as proposed?	
	No. of respondents: 53
Agree	18
Higher than 6 storeys	15
Lower than 6 storeys	14
Other	6

Other comments received include: as long as not all together as it blocks sky and funnels pollution; a mixture of 6-storeys and above 6-storeys; as long as adequate parking is considered; depends where and what its use is for; tower blocks could provide more open, green space; mid to high rise have safety implications; should be site appropriate.

Vanguard Storage Services Ltd (via agent) comments include: agree that the average height of development should be six storeys. This appears slightly contradictory with the key locations proposals, moreover it will also depend on uses and values. 'The average height of development should be lower than six storeys':- given the significant constraints for what is an island city and the findings of the PCCDS this would seem to be contradictory.

Morrisons (WM Morrison Supermarkets Plc) (via agent) comments include: The average height of development should be higher than six storeys.

Union4 Planning comments include:

- Whilst it is acknowledged that the CCDS images are indicative, they indicate the same form of medium rise block immediately to the north of the railway line, as they indicate across the wider centre and residential areas in the northern zones of the city centre (zones A, B and C). These are clearly very different areas and the form of development should not be replicated across the central area, especially given that each of the 5 areas (A-E) are identified as 'Identity Areas'. Whilst medium rise rectangular blocks are suitable for certain areas, they are not considered suitable for the main central area of the city and key arrival point around the transport hub, where building heights should be optimised.
- In terms of use, it is noted that the indicative masterplan, and likewise the emerging Local Plan, identify the land to the north of the station for commercial development. Whilst a degree of commercial floorspace and active ground floor uses, particularly towards the western end, nearest the station, may well be suitable in this location, this is not an area for speculative office accommodation and certainly not to the scale envisaged by the draft Masterplan. Whilst there may be potential for a quantum of office floorspace in this area, designed in a bespoke manner to accommodate an identified tenant, this would not be viable as a speculative development.
- As such, with regard to point D of policy S1 and question 37, it is suggested that the wider area should be identified as residential led mixed use, to optimise the number of new homes provided in this highly accessible and sustainable location, whilst allowing for the provision of employment floorspace as the market demands. The housing target envisaged under this part of the policy appears slightly unambitious, particularly given the number of units that have already been provided/approved within this zone. Density and height should be optimised in this key location.

Question 34a: Which development option do you think should be further considered as for the future of the Herbert Street / Victory Retail Park Regeneration area?	
	No. of respondents: 51
Option 1 - Residential-led	11
Option 2 - Residential and employment uses	26
Option 3 - Employment uses	12

Other	2
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Portico Shipping Ltd comments include: We endorse Option 3 - the presumption that “land to the west” of Landport Gate includes areas currently in port use and for related activities. The scenarios posed by Options 1 and 2 of this policy are of particular concern as they appear to risk introducing neighbouring activities that are not compatible with the proximity and operational nature of the Port (and, indeed, the adjoining Naval Base). The primary areas affected are Landport Gate and City Centre North, and these responses are broadly aligned to questions 32, 33 and 35 of the Consultation.

Vanguard Storage Services Ltd (via agent) comments include:

- Option 2 - The preceding sections of the letter have set out the physical and land-use constraints of the site. Para 7.1.19 states “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.” One of the key factors that is omitted is consideration of the heritage assets and the implications that this has on the site. This will need to be factored into any development.
- As both the landowner and current operator of the site Vanguard have no record of being contacted as part of the proposed allocation. Nevertheless, they would like to use this opportunity to propose that option ii) would be the most logical and would offer the best way to allocate the site with mixed use developments. Vanguard have every intention of pursuing planning permission to provide a new high-quality well-designed storage facility on the site. It would seem that given that they are integral to the allocation coming forward that their needs and requirements should form part of the overall strategy for its regeneration.
- One of the key parts of the evidence base in relation to this policy is the Portsmouth City Centre Development Strategy (January 2021) (PCCDS). This notes that the site is one of the key points of arrival in the city, a sensible approach to this would be to ensure a mixed use that responds to this, with this in mind the Council should also seek to consider how this would work given the constraints, and whether any of these constraints can be removed or considered, such as the conservation area boundary. The PCCDS also sets out that the site is underdeveloped and “presents a degraded and downbeat environment” (Page 16). It is clear that with the right allocation, and with a willing landowner that the site is capable of being delivered for the benefit of the city with a high-quality mixed-use development.

Morrisons (WM Morrison Supermarkets Plc) (via agent) comments include: Morrisons support either Option 1 or Option 2 as consider that their site has the potential to deliver a significant quantum of housing that would contribute to the City’s ambitious housing delivery targets. However, as per below we would suggest that the plan allows for a phased development to ensure the deliverability of development.

Question 34b: If residential-led (Option 1), do you agree with the proposed scale of development?	
	No. of respondents: 22
Yes	11
No	4

Other	7
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11 respondents indicated agreement with the proposed scale of development. Comments include: concern if traffic going through will cause pollution; public transport links.

4 respondents indicated disagreement with the proposed scale of development. Comments include: area is unsuited for residential development – too close to M275 and dockyard and port; would cause businesses to have to relocate to other less suitable sites; high-rise buildings close to dockyard would pose security and safety concerns.

Other comments include: high-rise buildings increases sense of stress and claustrophobia; not sure road system able to cope – congestion at peak times is bad; wrong place for residential without significant road changes; concern over proximity to poor air quality for future residents; needs to be higher and more ambitious.

Vanguard Storage Services Ltd (via agent) comments include: This really doesn't express scale but quantum, in any event the scale/quantum could be the same irrespective of the proposed option chosen.

Portsmouth Climate Action Board comments include: Our concern is the proximity to poor air quality for anyone living in this proposed area.

Morrisons (WM Morrison Supermarkets Plc) (via agent) comments include: Morrisons agrees with the indicative scale of development, however the policy / allocation should not place a strict limit on the scale of development, should a larger scale development be justified on design, visual amenity and indeed viability grounds

Question 34c: Would the Herbert Street / Victory Retail Park Regeneration area be suitable for a new linear park?	
	No. of respondents: 39
Yes	20
No	8
Don't know/unsure	8
Other	3

20 respondents indicated agreement to Q34c. Comments include: any additional green space is a good thing; essential to have some park/green space in the area; should maximise park land but perhaps strips of pedestrianised green space would be enough to leave space for homes and employment.

8 respondents indicated disagreement to Q34c. Comments include: should be employment use, particularly Portsmouth Port; more suitable as a shopping centre with residential complex on top.

Other comments include: opportunity to green the city is welcome but should not be as a token gesture towards environmental concerns; not unless accessibility was improved; should connect the port to the city centre.

Vanguard Storage Services Ltd (via agent) comments include: This would not be achievable and relies on the sites coming forward collectively and not necessarily by the

existing landowners who may have differing aspirations. While the need for open space for residential uses is paramount this needs to work with the delivery of the proposals as a whole and not act as a barrier to development. This could end up with being a very restrictive requirement which ends up being counter productive and blighting the site for delivery.

Portsmouth Climate Action Board comments include: We believe it is essential to have some park/green space in this area.

Morrisons (WM Morrison Supermarkets Plc) (via agent) comments include: Morrisons supports the principle of a linear park in this location as this would serve future residents, however given the desire to re-provide the Morrisons store on site we would need to consider the design / layout implications of this in more detail going forward.

Question 34d: Do you have any other comments on the approach to the future of the Herbert Street / Victory Retail Park Regeneration area?	
	No. of respondents: 18

Responses to Question 34b include: more Green Infrastructure; safeguard for Port development; highway infrastructure issues; improve links with rest of City Centre; improve air quality; proposals for education/healthcare space is needed for rest of city; retain supermarket; more detail plan required.

Portico Shipping Ltd comments include:

- Ports are, by nature, quasi-industrial, and operate on a 24 hour period throughout the year. The operational aspects of light, noise and traffic are different to standards required for residential and related mixed use sites, and it follows that promoting new development of these uses, as set out in Options 1 and 2, would be materially incompatible and detrimental to the Port.
- The Policy fails to recognise or consider the needs for expansion of uses and activities that support the growth of the Port (for example, warehousing, open storage, supporting engineering and other facilities). The City is, quite rightly, seeking to improve air quality and uses, and for the Port to be able to respond, and introduce new technologies to help meet more stringent targets, suitable adjacent land allocations will be needed, which the Plan should take into account.
- The proposed Landport Gate layout has serious implications relating to existing traffic access to the port and its main access gate (and, of note, Landport Gate actually takes land that is currently owned by Portico).

Portsmouth International Port comments include:

- Other than Tipner, we would like to re-emphasise our proposed land use for the following areas within the PCC area:
 - Area A: Hughes and Salvidge Scrap Yard Area – Circa 0.6Ha
 - Area B: North of Morrison Site and Industrial Employment Area -circa 1Ha
- Both sites are strategically placed south of the Portico terminal which are ideal for future expansion of the boundary and operational area of the Port. We would like to formally request for PCC to consider the potential utilisation of both these sites

indicated for future port development purposes in the Local Plan. The exact amount of land that can be allocated from these sites can be further discussed at the next stage of consultation.

Historic England comments include:

- The CCDS identifies nine new blocks in this area. Six of these are six storeys, with a 20-storey building at the southern end and ten and 15 storey buildings at the northern end.
- Our modelling indicates the 10, 15 and 20 storey buildings, would be visible above the roofline of buildings located in the 5 Mile End Conservation Area. These buildings include the grade I CHARLES DICKENS BIRTHPLACE MUSEUM and a number of grade II listed buildings. The conservation area and the buildings within it are significant for a number of reasons, particularly for interrelated historic and architectural values: the area offers a glimpse of a part of Portsmouth at the time of the birth of one of the city's most famous sons. The juxtaposition of this remnant Old Commercial Road with the A3 beyond and the built environment south along Commercial Road is a stark one. This area manages to remain a haven of relative tranquillity. New buildings visible above the roofline would represent an unwelcome intrusion and would harm the significance of the conservation area and the buildings within it.
- In order to ensure new buildings are not visible above the roofline from within the conservation area, our modelling indicates that the 20 storey (LPG9) building should be reduced to six storeys and the 15 storey (LPG2) building reduced to eight storeys. The 10 storey LPG1 should be reduced to 8-9 storeys. To compensate for the reduced capacity in the aforementioned buildings, LPG3, LPG5 and LPG7 could be increased to 8-9 storeys and LPG 4 and LPG 6 could be increased to eight storeys. If any of the proposed blocks are relocated, building heights would need to be revisited.
- In the past consideration has been given to relocate the A3 west of its current location, along Flathouse Road. The CCDS does not mention this. This would seem to be a missed opportunity. Relocating the A3 along the alignment of Flathouse Road would remove a significant barrier between the new development and the existing residential areas of Landport, which would be all the more apparent should this area be redeveloped to include a significant element of residential. The 'physical severance' is recognised in the CCDS but it is not addressed, except for via better north-south connection. As proposed, the new development would be like a peninsular, with only one entry and exit point, to its south. In order to function well as a place, it should have better connectivity to the east. This could perhaps follow historical streets such as Pitt Street and Herbert Street (currently curtailed by the A3).

Morrisons (WM Morrison Supermarkets Plc) (via agent) comments include:

- Morrisons note that the opportunity area covers land within their ownership, however it also includes 3rd party land to the north. Whilst we appreciate the Council's desire to deliver a comprehensive development across the area, we would suggest that the plan allows for a phased development to ensure the deliverability of development. We would also stress the importance of continuity of trade of the Morrisons store during the delivery of the development itself.

- In respect of the delivery of new housing, we would suggest that the Local Plan and policies in relation to this site adopt a flexible approach in respect of housing mix / tenure. The draft Local Plan confirms the need to deliver a variety of housing throughout the city to provide a choice of high-quality homes and to create inclusive, mixed and sustainable communities. In addition to open market housing, we consider that the site has scope to deliver Build to Rent as well as accommodation for students and the elderly.
- We note the draft Local Plan acknowledges the benefit of bespoke student accommodation which helps free up other residencies currently occupied by students. The draft Local Plan confirms that the provision of purpose-built student accommodation potentially allows for the release of Home in Multiple Occupation (HMOs) back to much-needed family homes. In light of this and given the location of the site we consider that there is scope to provide student accommodation on the current site, potentially as part of a mix of other residential accommodation.
- We consider that Build to Rent housing is a further option for this site. The Local Housing Needs Assessment confirms that this type of housing can meet the needs of a number of demographic and social groups within the community. The draft Local Plan also confirms that 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.”
- Finally, we also consider that the site has the potential to deliver accommodation for the elderly. Again, the Local Housing Needs Assessment identifies a growing demand for specialist elderly accommodation in Portsmouth. Based on our initial review, we consider there is scope to deliver retirement living as part of mixed tenure development, in particular extra care accommodation.

Question 35a: Do you agree with the proposed types of uses and the scale of development for the City Centre North Regeneration area?	
	No. of respondents: 46
Yes	32
No	6
Not sure/don't know	8
Question 35b: Do you have any further comments or suggestions about the proposed types of uses and the scale of development for the City Centre North Regeneration area?	
	No. of respondents: 20

Responses to Question 35b include: new leisure centre; traditional market; more residential; employment space on ex-Sainsburys site; wholly for employment space; more employment opportunities; residential on ex-Tricorn site; support for linear park continuation; luxury residential accommodation; negative comment about proposed housing numbers; release Cascade shopping centre for alternative uses; more Green Infrastructure; greater mix and diversity of uses; more building height; more public spaces; improved retail; relocate Tesco from Crasswell Street to allow for existing store to be redeveloped; parking-related issues.

Historic England comments include:

- This area includes the grade II* St Agatha’s Church. There is a current planning application (and listed building consent application) for St Agatha’s to be extended to both the north and the south. New development should respond positively to the extended church, if consented. The block shown in both the local plan and the CCDS does not respond successfully to St Agatha’s in either its current or extended form. This is because the section of block NLP7 that fronts onto Market Way appears too close to the church and the form of the new development does not seem to respond to the layout nor position of the church.
- St Agatha’s was previously enclosed by a tighter street pattern (prior to the bombing of the area immediately around the church and the subsequent construction of Market Way). Therefore, a new block pattern that also provides enclosure to the church could be acceptable, if sensitively designed.
- Furthermore, it seems a missed opportunity not to use the church to frame the end of the proposed east-west route between NLP7 and NLP12. Ideally, this route should be realigned with St Agatha’s and the church can be viewed from the eastern end of this route (the new square). This would be an example of using the historic environment to help shape new development and thereby improving the design quality of the new place. This would be part of the plan’s positive strategy for the conservation and enhancement of the historic environment.

Question 35c: Would the City Centre North Regeneration be suitable for a new public square?	
	No. of respondents: 36
Yes	23
No	7
Other	6

23 respondents indicated support for a new public square. Comments include: nice place for markets/events/etc where shown; as long as properly policed; if there is enough space; more places for creative uses and bringing communities together.

7 respondents indicated opposition for a new public square. Comments include: would be better placed in the south of City Centre; already have a square – enough squares already.

Other comments include: would prefer Commercial Road into Guildhall Square – should reinvigorate one central location rather than more; needs proactive engagement with local residents; maybe create a ‘Borough Market’ type area; would this be a replacement to Guildhall Square or in addition?

Question 35d: (If yes) Where should this new public space be located?	
	No. of respondents: 23

Comments to Question 35d include: near Commercial Road/Lake Road; not near main roads/traffic; near St Agatha's; Victoria Park; adjacent built-up residential and F+B; adjacent Charlotte Street; in an accessible area; near University; centred upon existing fountain; outside City Centre area.

Question 36a: Do you agree with the proposed types of uses and the scale of development for the Commercial Road / Arundel Street Regeneration area?	
	No. of respondents: 47
Yes	34
No	7
Not sure/don't know	6
Question 36b: Do you have any further comments or suggestions about the proposed types of uses and the scale of development for the Commercial Road / Arundel Street Regeneration area?	
	No. of respondents: 28

Responses to Question 36b include: agree with increased residential density/scale; keep area retail only; better evening economy; better public transport and infrastructure; affordable housing need; improve Cascades shopping centre; new public square; greater building heights; new department store; encourage new businesses; impact on existing businesses; more F+B provision; cater for student population; relocate Tesco elsewhere on Commercial Road; need for more Green Infrastructure; conserve/enhance heritage assets; negative comment about proposed housing numbers; limit future student accommodation development.

Historic England comments include:

- Cascades Shopping Centre has been excluded from the planned redevelopment of the city centre. While we understand that the current owner may not want to redevelop the area at this time, given the scale of proposed new development around Cascades, it would seem a major omission to not even consider how a redeveloped Cascades might be planned. The CCDS involves the creation of new routes and streets. The opportunity for this type of urban design only comes along rarely and therefore a comprehensive approach to the area should be taken, which fully explores how Cascades might be reconceived in future. In this way, the 'Paradise' area will help shape the development that will, at some point, succeed Cascades.
- The CCDS currently identifies blocks PAR13 and PAR17 as new blocks of six storeys. However, these blocks contain a number of good quality buildings, including two grade II listed buildings. Some of the non-designated buildings may also be suitable for inclusion on the local list.
- We would not support the loss of these two listed buildings. We would recommend that PAR13 and PAR17 be reconsidered with a focus on retention with the potential for some upward extension.

Question 36c: Should the Commercial Road area undergo a fundamental shift from retail to a more diverse range of work, social, and leisure uses?	
	No. of respondents: 48
Yes	33
No	10
Not sure/don't know	5

Question 37a: Do you agree with the proposed types of uses and the scale of development for the Portsmouth & Southsea Railway Station Regeneration area?	
	No. of respondents: 47
Yes	36
No	5
Not sure/don't know	6
Question 37b: Do you have any further comments or suggestions about the types of uses and the scale of development for the Portsmouth & Southsea Railway Station Regeneration area?	
	No. of respondents: 15

Responses to Question 37b include: negative comment about design/aesthetics of building or public realm; need to improve active travel infrastructure; new leisure centre; need to consider health/community/education facilities; prioritise housing for local workers; provisions for visitor population and economy; more parking provision; concern over proposed shower facilities; Green Infrastructure; enhance the rail station as a focal point; negative comment about identity area name.

Southern Water comments include:

- Southern Water has undertaken an assessment of existing infrastructure capacity and its ability to meet the forecast demand for each of the development sites set out in the draft Portsmouth Local Plan 2038. That assessment reveals that reinforcement of the local sewerage network would be required to accommodate 670-770 dwellings at Site D Portsmouth & Southsea Railway Station ('Work-station').
- This is not a constraint to development, provided Southern Water can work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.
- Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.
- Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.
- We therefore request the following provision be added to D – Portsmouth & Southsea Railway Station ('Work-station');
 - Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.

Historic England comments include:

- We agree that the entrance to the grade II listed Portsmouth and Southsea Station should be enhanced. However, we are concerned that some of the development proposed to the east of the station, on the Matalan site, would significantly detract from views of the front elevation of the station. This is because new buildings would be visible over the roofline of the station. The Greetham Street development already interferes with views of the front elevation of the station, and the situation should not be allowed to deteriorate further.
- In order to address the above, WKS6, immediately to the rear of the station, should be reduced from eight to four storeys and WKS7 should be reduced from eight to six storeys. The footprint of these two buildings could perhaps be increased, removing the cut-out sections, to compensate for the reduced height.

Question 37c: 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'?	
	No. of respondents: 29

Responses to Question 37c include: more Green Infrastructure (trees, planting, etc); enhance area around station; conserve/enhance historical aesthetics of building; enhance public/active transport access; new culture facility or activities; better visitor information provision; integrate station better with surroundings; better access/drop-off for passengers; enhance station platform and bridge; improve station/rail energy efficiency and use of renewable energy; modify Civic Office building to connect area better with Guildhall; utilise Matalan site for station use; improve links with other city areas.

Question 38a: Do you agree with the proposed types of uses and the scale of development for The Guildhall & Victoria Park Area Regeneration area (including the redevelopment of the law court/police station area to residential)?	
	No. of respondents: 48
Yes	28
No	11
Not sure/don't know	8
Question 38b: If you disagree, what should the future for The Guildhall & Victoria Park Area Regeneration area look like?	
	No. of respondents: 18

Responses to Question 38b include: concern over whether law courts are reprovioned; enhance Green Infrastructure provision; parking-related issues; need to retain police station provision; conserve Victoria Park; release Civic Offices for redevelopment; move Civic Offices to existing law court/police station; enhance Guildhall setting; concern whether Guildhall is retained; conserve heritage assets; more site area for the University; City Centre policy needs to include references to sustainable construction/energy; more mixed-use sites

Question 38c: Do you have any further comments or suggestions about the suggested approach to the density of new homes in the city?

	No. of respondents: 17
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Responses to Question 38c include: adequate parking provision needed for new homes; agree with higher density; concern over aging infrastructure capacity; concern over whether sufficient health/community/education facilities; concern over impact of high density on future residents; enhance Green Infrastructure; enhance play spaces; negative comment related to city reputation; enhance renewable energy provision; enhance public/active transport infrastructure; enhance access to Victoria Park; traffic-related issues; parking-related issues

Historic England comments include:

- We recently commented on a planning application for a 12-storey building on the former Victoria Baths site in Victoria Park (ref 21/01129/FUL). We expressed concern over the effect of a 12-storey building on views of the Guildhall and the wider conservation area. The CCDS would appear to seek to establish the principle of a 12-storey building here, without going through any part of the plan-making or development management process, which highlights a problem with this approach.
- We welcome the reestablishment of King Henry I Street directly through to Anglesea Road. New 10-storey buildings (GAV 1 & GAV2) are unlikely to be visible in views of the Guildhall (unlike the aforementioned 12-storey building), but buildings of this height will nonetheless require careful consideration. For example, 10-storey buildings in this location could harm the setting of the grade II listed Park Building, through appearing dominant to the listed building, due to the difference in height between the Park Building and a 10-storey building. Therefore, we would recommend that these buildings are 7-10 storeys, subject to a heritage impact assessment (7 storeys reflects the height of the existing King Henry Building).
- We welcome the recognition that the Central Library is a key building. While we note that the council’s Local List of Buildings was updated in 2021, the Central Library may merit inclusion on the local list the next time it is reviewed. This should take place before the plan is submitted.
- If the Civic Offices were to be redeveloped, we could support the principle of removing development from the existing northern wing of the Civic Offices as this element cuts across an important pedestrian route. We have some concern about “proposals to add a glassy new side extension” to the Guildhall. We would recommend the council engage Historic England in pre-application advise for any such application.

Question 38d: Do you agree with the proposed transformation of Winston Churchill Avenue - what else should be included or changed about this space?

	No. of respondents: 30
Yes	19
No	2
Other	9

19 respondents indicated agreement with the proposal. Comments include: boulevard-style would enhance the area; important to work sympathetically with nearby older roads and buildings, e.g. Eldon Street; include areas for community growing, arts, culture, and sport; needs modernisation.

2 respondents indicated disagreement with the proposal. No further comments were made.

Other comments include: making it better for pedestrians would be good; walking from Fratton to this area currently not good, this would improve this; is a significant change that needs more detail and explanation; where will the law courts/other public buildings relocate to?; University presence may over dominate this area; housing density should not overpower surrounding area; is a main thoroughfare for traffic – should look better but pedestrianisation inappropriate; making Mercantile House not on a traffic island is a good idea; create ‘walking pace zones’ by adding marks on pavement to measure walking distances.

S1 Portsmouth City Centre - Council response

The City Centre Development Strategy is the key evidence base document for this policy. The responses from the consultation have shown largely broad support for the approach and principles of the policy, and especially the focus for regenerating Portsmouth City Centre. Perhaps an exception to this is the question on average height of development, where there was more-or-less a split in opinions - and therefore this will be further considered as an issue through the CCDS work.

Nevertheless, the NPPF requires that planning policies should reflect changes in the demand for land, be informed by regular reviews of both the land allocated for development and of land availability, and consider whether there is reasonable prospect of the use allocated in the plan coming forward at the point envisaged.

Policy Status: Amber

There is further work required to substantiate the policy in terms of the deliverability and availability of the allocated sites identified in the draft policy. This includes a review of land availability and demand, consideration of any planning applications permissioned or coming forward, and consideration of the phasing of land, uses, and development quantum over the identified plan period.

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, sustainable community in a prominent location just off the M275 creating a new statement ‘gateway’ into the city.

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.

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.

The Local Plan 2038 Regulation 18 consultation sought views on three proposals at Tipner which are analysed below:

39a. What should the approach be to the future of Tipner?

Question 39a. What should the approach be to the future of Tipner?	No. of respondents:	Object to Option 1 email petition
	91	8,995
1. Innovative Sustainable Community (inc.land reclamation)	41	
2. Regeneration of Existing Area	29	
3. Maintain	18	

As outlined in the table above, respondents who directed answered question 39a, via email and the virtual room responses, considered viewed Option 1 as the most favorable approach, followed by Option 2 and finally Option 3. However, PCC received nearly 9,000 petition emails strongly objecting to land reclamation in Portsmouth harbour (option 1). Respondents who consulted via the petition did not support any proposal for land reclamation and only supported options which sought to protect and enhance the site for wildlife. Three respondents believed that none of the options put forward would provide a sustainable future for Tipner.

Alternative suggestions included a more suitable alternative to enhance the value of Tipner as an asset to people and wildlife; limited development including marine industry and downgrading the M275.

A common theme across all the comments received on Option 1 - 3 was support for a coastal access path, continuing the existing route around Tipner Lake, with links to the Horsea Country Park.

Option 1

39b. Option 1: Innovative Sustainable Community (inc. land reclamation): Do you have any comments or suggestions about the outlined principles and requirements for development'?	
	No. of respondents: 82

In total there were 8 responses to this question (excluding petition emails received via email). Responses varied with regards to positive and negative opinions on Option 1.

Positive comments included the opportunity, additional land and employment activity this would generate for the city. The main objection to this proposal are in relation to the impact on wildlife due to the loss of designated habitat (inc. carbon storing mudflats) and open space; there is the view that habitat loss cannot truly be compensated for through net gains and that this would set a precedent for the loss of other such areas.

The **RSPB** and **Hampshire & Isle of Wight Wildlife Trust** object in the 'strongest terms' to option 1 as these proposals would cause the greatest ecologic damage to the area. The mud flats are vital for the biodiversity of the area and land reclamation would create lasting detrimental environmental damage.

Natural England also objected to Option 1 being delivered due to the adverse effects on the integrity of Portsmouth Harbour SPA due to its significant and permeant loss. This would cause negative impacts on hydrodynamics, coastal processes, loss of habitat and impact on water quality. Further comments by Natural England raised concern for wildlife disturbance on Horsea Island if development were to be progressed here. Natural England believe if Option 1 is to be taken forward, it would not meet the NPPF's four tests of soundness.

There are views that either the scheme would be unlikely to meet the legal tests required for it to proceed, attain the funding that would be required for its delivery, or that development/ concept envisioned would not be the one delivered at the application stage, particularly with regard to securing the proportion of affordable housing that the policy would require.

The 'car free streets' aspect attracted mixed views. Comments suggested this would need to be supported by priority public/ active transport; large underground car park for all residents and priority car access for key workers and electric cars. There were also objections to 'anti-car' development and an alternative proposal for low speed and low density streets. In terms of other infrastructure there was support for the inclusion of a bridge to Horsea Island (to include lanes for active travel), in consultation with local residents regarding its usage. It was questioned whether one motorway access link would be sufficient as the main vehicular access.

Mixed views on the nature of development for this location; some feel it is ideal for well designed, high density tower blocks. Other would want to see low and medium rise development more in keeping with the wider Tipner/ Stamshaw area. The site's history/ heritage assets should be key features (and promoted as part of the coastal walk) while it's location should be utilised for tidal energy.

Alternative uses as part of this proposal were suggested: lorry parking provision and other uses associated with the Portsmouth International Port, nature reserve area and a site for camping/ campervans on route to the ferry crossings.

Despite reinforcement of the local sewerage network being required as stated by **Southern Water** for Option 1 and option 2, this is not considered a constraint to development. However planning policies are required to support the delivery of network reinforcements in order for them to be delivered in tandem with development, reducing any detrimental impact if they are not implemented.

Option 2

39c. Option 2: Regeneration of Existing Area: Do you have any comments or suggestions about the outlined principles and requirements for development'?	
	No. of respondents: 56

Option 2 attracted a mix of views: ranging from being not as ambitious or 'future proof' as option 1, a preferable solution for the need for new homes, too expensive or objections on the basis of the impact this would still have on the local environment.

RSPB and Hampshire & Isle of Wight Wildlife Trust comments raised the issue that Option 2 did not seem as ambitious in providing sustainable solutions as within Option 1. There were much fewer sustainability principles embedded into Option 2 when compared to Option 1.

Historic England raised further concerns for the significance of the listed buildings on the site and in the surrounding area including views from Porchester Castle and St Mary's Church. The existing view is predominantly undeveloped which should be retained with any development at Tipner being low-rise and a policy condition securing this. They further commented that the policy was unsound given limited evidence to support an allocation of 800 homes and 25,000sqm of employment space. Evidence should be presented to show how this development will not impact the historic significance of sites.

Natural England raised further concerns for Option 2 including the increased recreational pressure of the SPA, impact on the water quality, construction impacts and infrastructure requirements. The derogation test would need to be met to address any losses of habitat.

Some would support Option 2 but object to some elements of the proposal such as the loss/ relocation of existing development (the Harbour School) or the scale of employment land given the increased levels of working from home. Others would support variations such as an increase in secured affordable housing provision (40%), expansion to the Park and Ride to both sides of the M275, reuse of existing brownfield land and historic assets for commercial and residential uses and recreational/ habitat enhancements. There was support for including the bridge as critical infrastructure regardless of the scale of development proposed.

Option 3

39d. Option 3: Maintain: Do you have any comments or suggestions about the outlined principles and requirements for development'?	
	No. of respondents: 36

There was some preference for this option with many responses suggesting that the area should be maintain and enhanced as a nature reserve, for potential for perimeter public/ cycle access, or for community use that doesn't harm the environment.

RSPB and Hampshire & Isle of Wight Wildlife Trust welcome proposals for Tipner that seek no development beyond the existing footprint and secures the site as a valuable natural and community asset, although believe Option 3 does not achieve this. This is not a sustainable alternative to Option 1 or 2. Natural England also believe Option 3 (proposing up to 700 dwellings at Tipner East) will still have detrimental effects on Portsmouth Harbour SPA.

Others felt this was not a viable alternative option and the current area is an 'eyesore' that should be remediated and developed for new homes. However, there was a reluctance to go as far as Option 1 and 2 proposed, with comments suggesting that the prime target should be to develop areas in the inner city.

A handful of comments raised the option of pushing back against government's housing figures, as being an island city, it is simply not feasible to deliver the numbers of housing that are being proposed.

39c & d ii. Where instead should the other 2,700 / 3,500 homes and 34,000 sq m / 56,000 sq m of employment floorspace required be located?	
	No. of respondents: 90

Responses to part 2 of Questions 39c and 39d were similar and therefore have been grouped together as a separate question and analysed below.

Some responses felt strongly that the Government should be challenged on housing target on for Portsmouth given the environmental constraints densely populated nature of the city and limits on infrastructure capacity, or that the market would not support such a level of private new homes in Portsmouth at an affordable level for residents.

RSPB and Hampshire & Isle of Wight Wildlife Trust did not approve of the questions that was being put forward asking for opinions on where else to develop in Portsmouth and highlight the possibility for the council to make a case for 'exceptional circumstances' and adopt an alternative approach to determining housing need.

Most suggested that new homes should be focused on existing brownfield/ vacant plots in the city, or distributed across the city. The city centre was mentioned as having the best accessibility and suitability for higher densities of development and now has additional redevelopment potential due to the decline of retail. Another main suggestion was that development should be 'off island' to 'the north' of Portsmouth (E.g. Farlington playing fields) or beyond city boundary.

Other suggestions included: relocating the Navy from Whale Island, redeveloping Portsmouth Football Club site, redevelop existing retail parks/ spaces, building more tower

blocks/ upward to increase density and some specific vacant plots: Kwik Save in North End, former Tricorn site, ABC cinema site and the former Pit Street Bath

39e. Are there any other options for development at Tipner that the Council should consider?	
	No. of respondents: 50

Some comments in response to Question 39e were in favour of developing Tipner West given the significant need for housing within the city. These included high rise tower blocks and the creation of a new 'town hub' with associated infrastructure. Predominantly, suggestions that did support development on Tipner wanted to see it in a highly sustainable fashion to provide an innovative sustainable community. If Tipner West were to be developed, the location of development would have to be carefully considered; it would have to be high quality with the inclusion of affordable units.

The **RSPB** and **Hampshire & Isle of Wight Wildlife Trust** are not adverse to truly sustainable development at Tipner West including a sustainable level of affordable homes and marine employment focused within the existing brownfield land that seeks to protect and enhance wildlife and provides much needed greenspace.

Portsmouth Climate Action Board further believe the site should only be developed within the existing brownfield area with the use of low carbon, sustainable materials

Hampshire County Council also supports in principle sustainable development of this brownfield site. Early consultation with Hampshire County Council will however be required along with evidence of low mode-share by car and car free neighborhoods and detailed impacts on the road network.

Further comments proposed to develop on the site for uses alternative to housing (logistics park, port use, marine employment, miniature nuclear site) with additional development on Tipner East. Others also saw the opportunity for the development of leisure, education and recreation facilities whilst protecting and enhancing the environmental assets on the site to create a nature reserve. Further comments supported development on Tipner East and Horsea Island.

VIVID and **Bellway Homes** consider that the draft allocation should be separated allowing Tipner East to be delivered without reference to Tipner West (whilst including links to both where feasible). Bellway stated the policy wording should ensure that development within the allocated area at Tipner is able to be come forward in phases.

With regards to developing in other areas of the city, further comments proposed developing to the north of the city and extending its administrative boundary, developing the inner city and city centre, focussing investment on the rest of the city.

S2 - Tipner - Council Response
Responses received in relation to the three options proposed at Tipner provided an insight into how this policy needs to be developed as part of the next stage of the

Local Plan. Whilst there was some support for Option 1, there was a significant amount of opposition predominantly due to the environmental concerns and the impact on biodiversity. Whilst Option 2 was viewed in a slightly better light, concerns were still raised with regards to sustainability. The trend of sustainability issues continued in responses to Option 3.

Not all respondents were adverse to development, with a positive outlook on delivering sustainable and sensitively located development (on brownfield land) in order to protect and enhance the existing habitats and SPA.

The council will consider the most appropriate level and type of development that could be delivered at Tipner whilst providing high levels of sustainability.

Policy Status: Red

Policy S2 needs to be reviewed and updated to reflect the comments that were put forward during this stage. The Council will consider alternative proposals for the redevelopment of the Tipner area including options without land reclamation. Alternatives will need to be robustly evidenced, deliverable, in accordance with the Habitat Regulations and able contribute to the growth needs of the city. A full review of the Housing and Economic Land Availability Assessment with a 'Call for Sites' will be undertaken to further explore whether there are alternative locations/ options for housing and employment land.

S3 Fratton Park and the Pompey Centre

Fratton Park has been the home of Portsmouth Football Club since 1899 and its activities play an important cultural role in the city's identity. 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.

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.

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 deliver approximately 750 homes.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S3.

Question 40a: Do you agree with the proposed approach to Policy S3?	
	No. of respondents: 71
Yes	54
No	11
Not sure/don't know	6
Question 40b: Do you have any further comments or suggestions about the suggested approach proposed approach to Policy S3?	
	No. of respondents: 37

As the table above shows, the responses received in relation to Question 41a were mostly supportive with circa 76% of respondents agreeing with the proposed approach to Policy S3. Only circa 16% did not agree with the proposed approach and 8% were not sure.

Overall there was a mixed response in relation to Question 40b and the proposals set out in the draft policy. While a number of comments support the proposed development some comments do suggest rather than expanding the stadium at its current location the stadium should be moved elsewhere in the City such as Alexandra Park. The stadium is seen as a significant landmark and vitally important community hub in Portsmouth, with very limited mention of removing the stadium or whether it is needed.

Whilst the proposed development as set out in Policy S3 was supported in most instances, respondents felt that there were certain areas that still needed to be addressed. There were some concerns regarding the capacity of the local infrastructure with the proposed increased development, in particular the road infrastructure. There were concerns for how busy the roads got (especially on match day) and the lack of cycle or walking facilities. In addition, a

handful of comments also raised the need to provide more green infrastructure opportunities within the policy.

Other responses expressed concerns as to why the Council is allowing housing on a site identified as a 'strategic employment site' in the Economic Development and Regeneration chapter.

Pompey Supporters' Trust Board are supportive of the draft policy and have submitted some suggested amendments/corrections which are outlined below:

- *Para 7.3.1 The south stand was built in 1925 and is not part of the original stadium*
- *Para 7.3.3 Shouldn't reference to Rodney Road should read Fratton Way?*
- *Para 7.3.6 Current capacity, subject to H&S work, is c20,000 not 25,000*
- *Para 7.3.15 Reference to fig 28 should be fig 30 (four instances)*
- *Reference to "land west of the Pompey Centre" should read east of ... or west of Fratton Way?*

S3 Fratton Park and the Pompey Centre - Council response

The overarching aim of Policy is to support proposals that 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.

There appears to be some confusion with regards to the area identified as a strategic employment site in the Economic Development and Regeneration chapter and the site identified in the draft policy. The Fratton Park and the Pompey Centre is not located with the area identified in Figure 5.

The council will take on board comments received and amend or correct the policy where necessary.

Policy Status: Amber

Following the comments received, the wording of the policy will be amended to reflect some of the concerns that were raised. Further options for improving infrastructure in and around this area will also be considered when reviewing the policy.

S4 Cosham

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, and is considered to be able to deliver around 740 dwellings and 5,000 sqm of employment floorspace.

National Planning Policy 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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S4.

Question 41a: Do you agree with the proposed approach to Policy S4?	
	No. of respondents: 64
Yes	27
No	34
Not sure/don't know	3
Question 41b: Do you have any further comments or suggestions about the suggested approach proposed approach to Policy S4?	
	No. of respondents: 45

There were a total of 64 responses to question 41a of which the majority (circa 53%) did not agree with the proposed approach to Policy S4. Circa 42% agreed with the approach and only circa 5% were not sure.

The responses to Q41b included: concerns relating to inadequate infrastructure to support proposed housing numbers, such as GPs, schools, sewers/drainage; Cosham needs height, more public schools, improved F&B, more support for long-term tenants, pedestrianised high street; concerns over parking provision and existing capacity, and traffic congestion; proposed density seems very high, concern this will only be achievable through higher buildings that would ruin Cosham character; support for improvements to Spur Road/Northern Road; concerns over flood risk, especially from surface water; need for better quality shopping in Cosham; Bus Rapid Transit scheme needs to be better; concern over additional retail space provision; suggestion of adding trees wherever possible; should consider EV charge points in residential roads with only on-street parking and support for 'transport hub' - perhaps use the former IBM site.

Southern Water comments include:

- Southern Water has undertaken an assessment of existing infrastructure capacity and its ability to meet the forecast demand for each of the development sites set out in the draft Portsmouth Local Plan 2038. That assessment reveals that reinforcement of the local sewerage network would be required to accommodate 740 dwellings at Cosham.

- This is not a constraint to development, provided Southern Water can work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.
- Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.
- Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.
- We therefore request the following provision be added to site specific requirements for Policy S4: Cosham;
 - Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.

Portsmouth Labour Group indicated agreement with the policy.

NHS Property Services comments include:

- It is noted that Site Allocation S4 covers an area which includes Cosham Health Centre. NHSPS own the freehold to Cosham Health Centre.
- Cosham Health Centre currently consists of an operational health centre, comprising of a part two, part 3 storey building with one level of undercroft parking. Whilst the health centre is currently part operational, it is likely that the site will become surplus to NHS requirements as existing services are dispersed to nearby facilities which more adequately meet the needs of patients. After the property becomes vacant, NHSPS will seek to dispose of the health centre for best value.
- Importantly, the decision on whether a property is surplus to NHS requirements is made by the health commissioners and clinicians who use the property.
- Once declared surplus, NHSPS will explore alternative uses for the site, likely a residential redevelopment. The capital receipts and savings generated from the disposal of the property will enable investment in modern services and means of care for the NHS. It is therefore encouraging to see that the council recognise that Cosham Health Centre could be better optimised, offering an opportunity to deliver significant regeneration in partnership with relevant public bodies
- NHSPS support the council's intention to deliver high-quality mixed-use development, comprised of high-density housing within the site allocation. NHSPS also support the opportunity to redevelop existing buildings and land plots to make the most efficient use of land.
- To deliver this, the council will take a 'proactive role in identifying and helping to deliver land that may be suitable for meeting development needs.' To implement this, 'the 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.'

- Whilst NHSPS supports the overall approach to the site allocation, it is imperative that the council support NHSPS in seeking to explore alternative value generating uses for Cosham Health Centre and ultimately achieve best value for patient services in the area.

Public Health England comments include:

- All being well, the correct use of preceding policies should mean that all strategic development considers health and wellbeing issues as a matter of course.
- Public Health are already engaged in ongoing work on several strategic sites and have previously made representations to consultations for Cosham, St James' and Tipner, but to highlight the key messages:
 - Air quality, reducing vehicle dominance and car use must be a priority for all strategic sites, but particularly those already in higher density areas of the City.
 - There is a clear expectation that Strategic Development site proposals pay close attention to, and clear adherence with, the Health Pollution and Amenity Policy.
 - I note that the strategic site policies all refer to active and sustainable travel infrastructure, but question where the overarching policy provision is to ensure that they're all connected and that wider infrastructure improvements are made beyond site boundaries to enable a high quality, functioning network?
 - All strategic sites need to ensure they are providing opportunities for, and not adversely impacting upon, existing communities - this can be addressed through Health Impact Assessment.
 - For all strategic sites, Public Health fully supports proposals for off-road active routes (particularly emphasised in Policy S3: Fratton Park and the Pompey Centre). Further policy provisions for clear segregation between cycles/scooters and pedestrians are encouraged wherever possible, as well as the role of greening to be recognised as a way in which to improve the amenity value of these areas (to encourage walking and cycling).

S4 Cosham - Council response

The responses from the consultation have not shown there is majority support for the policy. The main concerns appear to be whether there are adequate provision of physical and social infrastructure to support the level of proposed development allocated to Cosham.

Notwithstanding, the NPPF requires that planning policies should reflect changes in the demand for land, be informed by regular reviews of both the land allocated for development and of land availability, and consider whether there is reasonable prospect of the use allocated in the plan coming forward at the point envisaged.

Policy Status: Amber

There is further work required to substantiate the policy in terms of the deliverability and availability of the allocated sites identified in the draft policy. This includes a review of land availability and demand, consideration of any planning applications permissioned or coming forward, and consideration of the phasing of land, uses, and development quantum over the identified plan period. There is also further need to identify and assess any infrastructure needs required to support the proposed level of development allocated to Cosham.

S5 St James and Langstone Campus

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. 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.

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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S5.

Question 42a: Do you agree with the proposed approach to Policy S4?	
	No. of respondents: 58
Yes	35
No	14
Not sure/don't know	9
Question 42b: Do you have any further comments or suggestions about the suggested approach proposed approach to Policy S4?	
	No. of respondents: 44

Of the 58 responses to question 42a, the majority (circa 60%) agreed with the approach that had been taken to Policy S4. Circa 24% of respondents disagreed with the approach and circa 16% were not sure or did not know.

There were a mix of comments received in relation to question 42b. Some common responses included the feeling that there was too much development proposed at the site at a proposed density that was too high. Any development would need to be sensitive to the surrounding heritage assets, still allow public access and provide sufficient levels of supporting infrastructure. Other comments including from Homes England supported the allocation of 436 dwellings, but recommended a number of amendments to the policy.

The **University of Portsmouth** support the approach to Policy S5, stating the campus site has capacity to accommodate 310-410 homes on the previously-developed section

Solent NHS Trust object to the allocation of greenspace around the hospital due to the restrictions this places on development of the land. It is not 'public open space' as alluded to and therefore it is essential to retain this land as an opportunity for future healthcare development. **PJ Livesey and NHS Property Services** further state that the policy wording should not identify the specific areas of open space to be retained with the exception of the cricket club.

Milton Neighbourhood Forum feel that the principle of a 'Green City' will be compromised by both St James' and Langstone Campus as strategic development area due to already existing congestion hotspots. The comments raised proposed excluding Langstone Campus as a strategic site.

Of the comments received in relation to Q42b, a common responses highlighted the importance of the green space, in particular the protection and retention of the trees, and open spaces for biodiversity. The RSPB and Hampshire & Isle of Wight Trust were concerned about the proposed housing allocation without any mitigation or off-setting, questioning the soundness of the policy. Natural England raised concerns for the direct and/or indirect effect on the SPA supporting habitat. Concerns were raised regarding the overall levels of development and the impact this could have on vehicular access and potential congestion on an already pressured road network.

Historic England felt the policy to be unsound due to limited relevant and up to date evidence

There was overall support for the ongoing medical uses as part of the site mix, however, some responses questioned the sites suitability for elderly person's accommodations.

The Milton Neighbourhood plan was raised on a number of occasions with both support and concern to it being referenced.

S4 St James and Langstone Campus - Council response

There were a mix of responses in relation to Policy S5. There was some level of support for the proposal, however others raised concerns over the density of the proposed development and the amount of development that was being proposed. Other common areas of concern included the loss of biodiversity, trees and open space and the increased levels of traffic and connection that this could cause on an already pressurised road network. The Council needs to ensure that the policy position on protection of open space is clarified, and further emphasis put on the value of spaces on the sites.

Policy Status: Amber

The Policy will require amendments to emphasise the need to protect biodiversity and green infrastructure. The council will monitor the position held by Milton Neighbourhood Forum on the open space allocation at St James' following meetings with the NHS Property Services and ensure the new Local Plan complies with the decision reached.

S6 Lakeside Business Park

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.

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.

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.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S6.

Question 43a: Do you agree with the proposed approach in Policy S6?	
	No. of respondents: 45
Yes	26
No	19
Question 43b: Do you have any further comments or suggestions about the suggested approach in Policy S6?	
	No. of respondents: 36

The comments received in relation to Question 43b were largely supportive of the employment-led approach to provide at least 50,000sq of office uses (Class E(g)(i-iii) uses). However, several responses were not supportive of the residential element of the Policy S6 with many having concerns on the impact of so many dwellings on the local infrastructure, the knock on effect to biodiversity, the environment and green space, and the lack of public transport to the site.

The **Woodland Trust** has identified a notable tree (Ancient Tree Inventory ID 58610) within this area and have asked that this tree and its root protection area should be safeguarded in any proposals for this site.

Natural England advise that the requirement for consideration of impacts of developing this site on the network of SPA supporting habitat is assessed at the earliest possible stage, to inform the sustainable development of this site, including the requirement for mitigation.

An assessment undertaken by **Southern Water** revealed that reinforcement of the local sewerage network would be required to accommodate 500 dwellings at Lakeside & North Harbour. This however is not considered a constraint to development, provided Southern Water can work with the site promoters to understand the development programme.

S6 - Lakeside Business Park - Council Response

The overarching aim of Policy S6 is to set out the uses and criteria for new development proposals at Lakeside. The council will take on board comments received, especially in relation to the environmental impact on developing the site and how traffic could be reduced.

Policy Status: Green

Overall this policy is considered to be suitable, with only potentially minor amendments.

9. Area Allocations

S7 PCC Estate Renewal

Within the city there are a number of housing estates which are predominantly in Portsmouth City Council's ownership. Due to these estates being largely developed in the post war period, the Local Plan is considering 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.

Portsmouth City Council were awarded funding to test the government's National Model Design Code (NMDC) in March 2021. Working with the Department for Levelling Up, Housing and Communities (DfLUHC) (formerly known as the Ministry of Housing and Local Government (MHCLG)), Portsmouth City Council is seeking to develop a design coding process for estate renewal within the city, using Horatia and Leamington site redevelopment in Somerstown as a case study for the pilot.

The Local Plan 2038 Regulation 18 consultation asked a number of specific questions relating to PCC Estates Renewal areas and the development and testing of a potential Estate Renewal Design Code.

Question 44a: Do you agree with the proposed approach in Policy S7?	
	No. of respondents: 22
Yes	20
No	1
Not sure/don't know	1
Question 44b: Do you have any further comments or suggestions about the suggested approach in Policy S7?	
	No. of respondents: 10

The comments received in relation to Question 44b were largely positive and included; Support to continue to keep the housing estates in Council ownership, Ensuring that housing is built to the highest standard with access to green space and that the views of the existing PCC estate residents are considered, with the suggestion of an estate ballot where plans

involve the redevelopment of existing homes. Statutory consultee, Natural England, commented with reference to the area of Paulsgrove, one of the areas included within this policy, which lies directly adjacent to Portsdown SSSI, which is designated for chalk grassland and invertebrate assemblages. Natural England suggested development proposals in this area should include an assessment of any potential impacts to the SSSI, and where required, be accompanied by appropriate mitigation measures.

Question 44c: What elements of the existing estate areas are important and should be retained?	
	No. of respondents: 9

The comments that were received under Question 44c included; open space, gardens, community hubs and centres and the character of older buildings, if safe to do so.

Question 44d: What elements should be renewed for the future?	
	No. of respondents: 12

The comments that were received under Question 44d included; dated tower blocks, badly connected developments, the insulation of homes, the quality of build, green spaces and encouraging areas for residents to grow their own, community facilities such as doctors surgeries and shops, ensuring that older housing stock is renewed to ensure those living their can do so safely and healthily and reducing the height of buildings when redeveloping, where possible.

S7 - Estate Renewal - Council Response
The very low number of responses to this policy are noted. The majority of respondents agreed with the Council's approach to this policy. The responses to the regulation 18 consultation highlight the importance of housing estates within the Council's ownership, ensuring high quality builds and green and open spaces for residents to access. Natural England suggested development proposals within the Paulsgrove estate should include an assessment of any potential impacts to the SSSI, and where required, be accompanied by appropriate mitigation measures. The Council will investigate this further in preparation for the regulation 19 plan.
Policy Status: Green
The Council welcome the responses and suggestions received and will carry out further investigations of the points raised and will refine the policy accordingly. This will also need to be clearly shown through the regulation 19 plan and supporting documents.

S8 The Seafront

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.

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. New sea defences are also planned, which will not only provide sufficient protection 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.

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 describes development opportunities in further detail.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S8.

Question 45a: Do you agree with the proposed approach in Policy S8?	
	No. of respondents: 52
Yes	38
No	7
Not sure/don't know	6
Question 45b: Do you have any further comments or suggestions about the suggested approach in Policy S8?	
	No. of respondents: 34

The responses to Q45b included: the lack of connectivity between the seafront from northern part of city; introducing free parking for residents; incentivise visitors to use train or Park & Ride; the importance of protecting the open and uncluttered character, and limiting development along seafront; the need for the sea defences; how it is critical to preserve the unique natural habitats; inclusion of more indoor visitor attractions; the need for more beach huts; highlighting the dominance of vehicle traffic which needs to be brought under control - reallocate road to restrict on-street parking in favour of sustainable/active travel and the suggestions of including the Clarence Pier site and area near Hovercraft - which has development potential; tree and wildflower-planting on some areas of Common; extend open top bus route to Gunwharf; idea for 'Pompey Pass' to cover discounted entry into attractions/buses and the idea for seafront to host 'Formula E' races. There was also the mention of pollution of sea by water companies.

RSPB and Hampshire & Isle of Wight Wildlife Trust comments include:

- The proposed approach to The Seafront needs to be undertaken with care. The supporting evidence, including the Masterplan and the HRA of the Seafront Masterplan, highlight the sensitive wildlife sites scattered throughout this area. This

includes Core Areas supporting brent geese and forming a network of SPA functionally linked land as well as the impact to Portsmouth and Chichester and Langstone Harbours SPAs. However we do not agree with the conclusions of the HRA of the Seafront Masterplan due to a lack of supporting evidence, particularly in the case of recreational pressure and loss of functionally linked land, which we feel should be further assessed. Therefore we recommend that the Draft Local Plan HRA screens in the additional impacts pathways of recreational pressure and loss of functionally linked land in respect of Policy S8, as we do not consider these effects can be ruled out at this stage.

- It is important to recognise the ecological sensitivities of these sites and how the objectives of Policy S8 can be achieved whilst not having a negative impact on important sites. We would support the inclusion of the additional text recommended by the Draft Local Plan Appropriate Assessment (para 6.38) in respect of Policy S8, and consider this would improve the soundness of The Seafront policy.

Historic England comments include: We have no specific comments regarding this policy. We commented on the now adopted Seafront Masterplan and we are content that our comments were sufficiently responded to in the Seafront Masterplan.

Woodland Trust comments include: We welcome the policy that development proposals must take into account of the proposed 'green corridor' for the seafront. We note the presence of a veteran tree (Ancient Tree Inventory ID 156232) and a notable tree (Ancient Tree Inventory ID 25700) within this area. We ask that these trees and their root protection areas should be safeguarded in any proposals for this site.

Portsmouth Labour Group indicated support for this policy.

Premier Marinas Ltd (via agent) indicated support for this policy.

Natural England comments include:

- We welcome the clear requirements for the protection and enhancement of the natural environment included in this policy, including reference to the Seafront Masterplan SPD (March 2021) which provides some additional detail on construction and disturbance impacts.
- Thorough consideration of the impacts of development on designated sites and supporting networks including SPA supporting habitat will be required, together with the need for mitigation and/or compensation. However, Natural England recommends construction work (including any noisy activities in excess of 69 dB LAF,max) should avoid the bird overwintering period which we advise covers October to March inclusive.
- The identified Seafront Area includes numerous parcels identified as supporting habitat for the Solent SPAs. To support existing approaches outlined in the Masterplan, and to inform any development coming forward in this area outside of the Masterplan, we advise Policy S8 includes a clear reference to the potential for development in this area to impact SPA supporting habitat. Similarly, any impacts to adjacent Habitats Sites should also be robustly assessed, and appropriate mitigation or compensation strategies developed. Project-level HRA may be required.

S8 The Seafront - Council response

Responses from the consultation indicate support for this policy. Concerns that have been raised overlap with and are addressed by themes from other policy areas, such as Transport, Biodiversity, and Green Infrastructure, which any development proposal should have due regard to as well as the policies of this plan as a whole.

Additionally, 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.

Policy Status: Green

The Council welcome the responses and suggestions received through the Regulation 18 consultation and will only make minor changes to this policy if necessary.

S9 Portsdown Hill

Portsdown Hill is one of the largest areas of open space in Portsmouth and forms the northern boundary of the city and adjoins the Winchester, Fareham and Havant authority areas. 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 and 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.

National Planning Policy states that access to a network of high quality open spaces, and opportunity for sport and physical activity, are vital for health and wellbeing. Policy S9 of the New Local Plan encourages the delivery of proposals on Portsdown Hill that increase and enhance public access to land, biodiversity or active travel, whilst protecting and enhancing the key characteristics including its landscape, ecological and heritage value.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S9.

Question 46a: Do you agree with the proposed approach to Policy S9?	
	No. of respondents: 44
Yes	40
No	4
Not sure/don't know	2
Question 45b: Do you have any further comments or suggestions about the suggested approach in Policy S9?	
	No. of respondents: 15

Responses to Q45b included: support to improve public access to Portsdown Hill, as well as ways to better improve current access, in particular due to the unsafe nature of Portsdown Hill Road. It was believed that there should be better signposting, safer ways to cross the road with necessary safe cycling infrastructure implemented to better allow for both vehicles and cyclists. Further comments commended the efforts to make Portsdown Hill a visitor destination, with further encouragement for more leisure uses.

Fareham Borough Council supported the approach to Portsdown Hill which supports that contained within the submitted Fareham Local Plan.

Winchester City Council's comments promoted conservation and protection of Portsdown Hill for its recreation, landscape, heritage and biodiversity importance, the explanatory text supported the use of Brownfield Land for employment development which is not suitable for its remote nature. Winchester Council suggested *"the policy provides only for recreation-related development and defines in due course the extent of brownfield land on the policies map"*.

S9 Portsdown Hill - Council response

The overarching aim of Policy is to support for proposals on Portsdown Hill that increase and enhance public access, including the expansion of existing open access and creation of footpaths, whilst protecting the important features and characteristics of the area.

Further emphasis will be made within the policy for enhanced and improved safety for visitors, cyclists, pedestrians and road users. Enhancements to recreation, biodiversity or active travel should consider the safety of users and where possible reduce existing risks.

The council will take into account the comment raised by Winchester City Council and review the use of brownfield land for employment use.

Policy Status: Green

Overall, Policy S9 is considered to be suitable with very few amendments required.

S10 Coastal Zone

Portsmouth has a significant length of coastline within its boundaries which brings a range of benefits for the city, including health and wellbeing, tourism and recreation, heritage and marine and maritime related industries. The coastline environment will need management to address predicted sea level rise.

National Planning Policy 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. Therefore, Policy S10 allows for and recognises the expected coastal management changes over the plan period and sets out requirements for any development proposals within the Coastal Zone.

The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S10.

Question 46a: Do you agree with the proposed approach to Policy S10?	
	No. of respondents: 39
Yes	36
No	2
Not sure/don't know	1
Question 46b: Do you have any further comments or suggestions about the suggested approach in Policy S9?	
	No. of respondents: 15

One of the main themes of the comments in response to Q46b is the proposed boundary of the Coastal Zone policy area, with many questioning why the boundary is smaller from the policy in the 2006 Local Plan and no longer includes the boundary of the sports-fields abutting the St James' Hospital eastern boundary. With this in mind, comments asked that the policy boundary be reinstated to replicate the 2006 policy boundary.

Natural England suggest consideration is also given to the North Solent Shoreline Management Plan refresh and its associated sub-categories and the Southern Region Habitat Creation Programme. They also suggest that the following bullet point in the summary table:

“Avoid adverse impacts upon marine and maritime related uses, infrastructure and activities; and” would benefit from the inclusion of the term coastal fringe. As an example: “avoid adverse impacts upon the coastal fringe, marine and maritime related uses, infrastructure and activities; and”.

Policy S10 Coastal Zone - Council response

The Policy allows for and recognises the expected coastal management changes over the plan period and sets out requirements for any development proposals within the Coastal Zone.

The council will take on board the concerns raised in regard to propose boundary of the policy in particular with regards to including the boundary of the sports-fields abutting the St James' Hospital eastern boundary and amend the policy to reflect comments submitted by Natural England.

Policy Status: Green

Following the comments received and Portsmouth Council's response, there are only some minor changes required to be made to Policy S10.

10. Other Comments

To ensure the Draft New Local Plan Consultation was accessible and reached as many people as Portsmouth as possible, we used an online virtual room website, which included a feedback form. This feedback form asked 'Do you have any other comments on the Draft Local Plan proposals?' and is analysed below.

Question 47: 'Do you have any other comments on the Draft Local Plan proposals?'	
	No. of respondents: 28

The majority of comments received in relation to Question 47 were positive and included ensuring Portsmouth retain a bold vision for the future, noting how well the city's sea defences are progressing, the need for infrastructure (including schools and doctors surgeries) must be address through this plan alongside the proposed development, all Portsmouth Football Club ground and stadium enhancements are welcomed, the policies need to be linked to the four main aims and respondees would like to see housing for key workers reference in future versions of the Local Plan.